

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

MOEEN MEHRI-JAMILI,
A# 

Plaintiff / Petitioner,

Case No. _____

v.

PAMELA BONDI, United States Attorney General; **HAYDEN O'BYRNE**, U.S. Attorney for Southern District of Florida, **GARRETT J. RIPA**, Acting Executive Associate Field Officer Director for the ICE Miami Office of Enforcement and Removal Operations; **CHARLES PARRA**, Assistant Field Office Director, Miami, Florida; **TODD LYONS**, Acting Director of the United States Immigration and Customs Enforcement; and **KRISTI NOEM**, Secretary of the United States of Department of Homeland Security.

Defendants/ Respondents.

**PETITION FOR WRIT OF HABEAS CORPUS AND EMERGENCY MOTION FOR
IMMEDIATE TEMPORARY RESTRAINING ORDER**

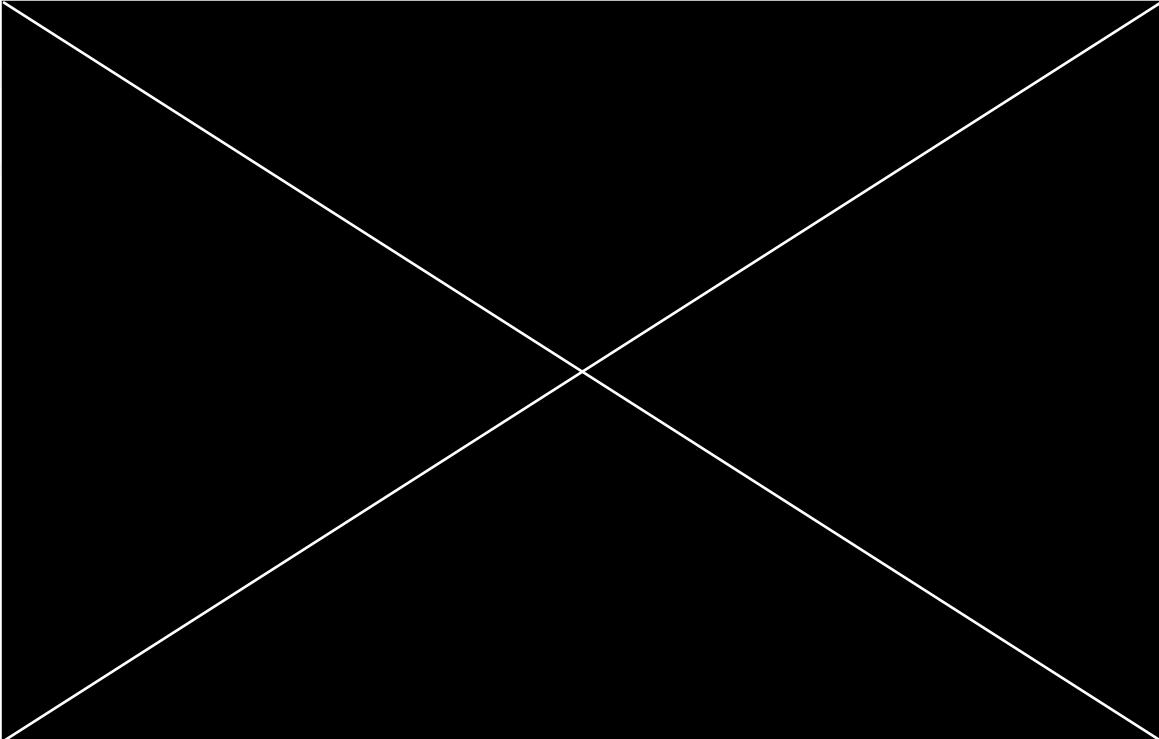
INTRODUCTION

1. Petitioner, Moeen Mehri-Jamili (“Mr. Mehri”), is a national of Iran who has resided in the United States for the past thirty-seven (37) years since his initial arrival on April 5, 1987, as a lawful permanent resident. Mr. Mehri has lived most of his adult life in the United States. He is married to United States Citizen Michelle Meri (“Mrs. Meri”) and has six (6) United States Citizen children and stepchildren that he has raised to be productive members of American society. See

Exhibit A for proof of Mr. Mehri's family's citizenship. Mr. Mehri was baptized under the Christian faith and has practiced his faith as a Christian for over the past twenty (20) years.

2. On February 21, 2008, the Department of Homeland Security ("DHS") issued a Notice to Appear against Mr. Mehri due to a 2008 conviction.

3. On May 29, 2008, the immigration judge ordered Mr. Mehri removed to Iran and granted Mr. Mehri's application for deferral of removal under Article III of the Convention Against Torture ("CAT"). See **Exhibit B**, a copy of the IJ Order. In the immigration Judge's Order, the immigration judge specifically crossed out the words "or in the alternative to." See **Exhibit B**. Specifically, the Immigration Judge failed to include any alternative third countries of removal as required by regulation under 8 C.F.R. § 1240.10(f), making clear that Mr. Mehri could not be removed to any third country.

4.  

5. To date, in the seventeen (17) years following the decision, DHS has failed to identify or propose a viable third country alternative for removal—particularly one where Mr. Mehri would be protected from detection and torture by the Iranian government, its affiliates, al-Qaeda, or the government of the third country. More specifically, no third country alternative has been provided to Mr. Mehri or his counsel prior to his unlawful detention by Immigration and Customs Enforcement (“ICE”), nor was Mr. Mehri provided any assurances he would not be tortured in a third country nor provided an opportunity to present or contradict any such assurances. The likelihood of Mr. Mehri being tortured has only increased, particularly given the recent escalation of violence and the threat of war by the Iranian government, including recent bombings and attacks by and in Iran.

6. Despite having protection under the Convention Against Torture, Mr. Mehri’s Order of Supervision was revoked and he was detained by Immigration Customs and Enforcement (“ICE”) at his home without explanation on June 23, 2025. He is currently being detained at Krome North Service Processing Center. In detaining Mr. Mehri, ICE violated his due process in failing to comply with the statutory requirements required to revoke an Order of Supervision outlined in 8 C.F.R. § 241.4(l)(2).

7. In light of there being no change in circumstances or third country designation that assures Mr. Mehri will not be tortured, there is no significant likelihood of removal in the reasonably foreseeable future, and continued detention violates the fundamental constitutional protections of due process and those protections established in *Zadvydas v. Davis*, 533 U.S. 678 (2001). In *Zadvydas*, the Supreme Court held that the government may not detain individuals indefinitely where removal is not reasonably foreseeable. Given Mr. Mehri’s ongoing CAT

protection and the lack of any identified removal destination, his detention is both arbitrary and unlawful.

CUSTODY

4. Petitioner satisfies the “in custody” requirement for habeas review because he is currently being physically detained by ICE-ERO at the Krome North Service Processing Center.

JURISDICTION

5. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1651 (All Writs Act), 28 U.S.C. § 1331 (federal question) and the U.S. Constitution, art. I, § 9, cl. 2 (Suspension Clause). While the courts of appeals have jurisdiction to review removal orders directly through petitions for review, 8 U.S.C. § 1252(a)(1), (b), the federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear *habeas corpus* claims by aliens challenging “the constitutionality of the entire statutory scheme under the Fifth Amendment.”¹ This case arises under the United States Constitution; the Immigration and Nationality Act (“INA”), 8 U.S.C. §§1101 *et seq.*, and the Due Process Clause of the Fifth Amendment. This Court has remedial authority under its inherent authority and the All Writs Act, 28 U.S.C. §1651.

6. Furthermore, 28 U.S.C. § 2241 authorizes district courts to grant writs of habeas corpus to individuals “in custody in violation of the Constitution or laws or treaties of the United States.” federal district courts have jurisdiction to hear habeas claims by noncitizens challenging

¹ *Jennings v. Rodriguez*, 138 S. Ct. 830, 841 (2018). District courts also have jurisdiction to review “collateral challenges to unconstitutional practices and policies” used by Respondents in reaching their decision. *McNary v. Haitian Refugee Ctr., Inc.*, 498 U.S. 479, 896 (1991).

the lawfulness or constitutionality of their detention; as well as claims by noncitizens seeking to protect their due process rights. *See Jennings v. Rodriguez*, 138 S. Ct. 830, 840-41 (2018); *Demore v. Kim*, 538 U.S. 510, 516-17 (2003); *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001). Petitioner is currently detained by U.S. Immigration and Customs Enforcement (“ICE”) within this judicial district, satisfying the “in custody” requirement at the time of filing. *See Zadvydas v. Davis*, 533 U.S. 678 (2001); *Demore v. Kim*, 538 U.S. 510 (2003).

5. This Court additionally has jurisdiction under Article I, Section 9, Clause 2 of the U.S. Constitution, the Suspension Clause, which guarantees the availability of the writ of habeas corpus except in cases of rebellion or invasion. The claims raised herein are not barred by 8 U.S.C. § 1252, as Petitioner is not challenging the validity of the final order of removal, but rather the legality of detention in the absence of a foreseeable removal and in violation of due process under the Fifth Amendment. *See Clark v. Martinez*, 543 U.S. 371 (2005) (extending *Zadvydas* to inadmissible aliens); *Trump v. J.G.G.*, 145 S. Ct. 1003 (2025) (The constitutionality of immigration detention is in context of a habeas corpus claim) *Bunthoeun Kong v. United States AG*, 62 F.4th 608,614 (3d Cir. 2023) (8 USC § 1252(b)(9)'s phrase is not 'infinitely elastic' and does not encompass claims collateral to the removal order, such as unlawful detention); *E.D.Q.C. v. Warden, Stewart Det. Ctr.*, No. 4:25-cv-50-CDL-AGH, 2025 U.S. Dist. LEXIS 104781 (M.D. Ga. June 3, 2025) (the court does not read § 1252(g) to shield unlawful actions from judicial review).

6. Lastly, the Supreme Court's recent decision in *D.V.D. v. United States Dep't of Homeland Sec.*, does not alter this Court's authority to grant relief to Petitioner. The Supreme Court's decision reinforced the fact that an individual habeas petition is the appropriate avenue for relief instead of universal injunctions. *D.V.D. v. United States Dep't of Homeland Sec.*, No.

24A1153 (U.S. June 23, 2025) (stay granted). The Court has never said that non-citizens facing removal are not entitled to due process, but that individual habeas claims are a proper remedy as opposed to injunctions. *See Trump v. J.G.G.*, 145 S. Ct. 1003 (2025). (It is well established that Fifth Amendment entitles aliens to due process of law), *citing Reno v. Flores*, 507 U.S. 292, 306 (1993); *Mullate v. Central Hanover Bank & Trust Co.*, 339 U.S. 306 (1950) (detainees are entitled to notice and opportunity to be heard “appropriate to the nature of the case”).

VENUE

10. Venue is proper because Petitioners' detention and removal proceedings have all occurred in the Southern District of Florida. 28 U.S.C. § 1391(e)(1)(B). Venue is also proper because Petitioner resides in Miami, Florida, which is in the Southern District of Florida, and Mr. Mehri is detained in ICE custody in the Southern District of Florida. 28 U.S.C. § 1391(e)(1)(C) and 28 U.S.C. §2241(d).

PARTIES

11. Petitioner Moeen Mehri-Jamili is a citizen of Iran who is currently detained indefinitely at the Krome North Service Processing Center. He was granted protection under the Convention Against Torture on May 29, 2008, and was taken into custody indefinitely and without explanation in violation of his due process rights on June 23, 2025.

12. Respondent Pamela Bondi is the Attorney General for the United States Justice Department. Ms. Bondi is the official ultimately responsible with proper enforcement of federal immigration law. She is sued in her official capacity.

13. Respondent Hayden O'Byrne is the U.S. Attorney for Southern District of Florida. He is the chief federal law enforcement officer in the district. He is sued in his official capacity.

14. Respondent Garrett J. Ripa is the Acting Field Office Director for the ICE Miami Office of Enforcement and Removal Operations (“ICE ERO”). In this capacity, he has jurisdiction over Petitioner and is a legal custodian of Petitioner. Mr. Ripa is sued in his official capacity.

15. Respondent Charles Parra is the Assistant Field Office Director. Mr. Parra is responsible for effectuating Petitioners’ removal from the United States and is their immediate custodian. He is sued in his official capacity.

16. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement (“ICE”). In this capacity, he has responsibility for the enforcement of the immigration laws, including detention and removal. As such, he is a legal custodian of Petitioner. Mr. Lyons is sued in his official capacity.

17. Respondent Kristi Noem is the Secretary of the Department of Homeland Security (“DHS”), the arm of the U.S. government responsible for enforcement of immigration laws. ICE is a subdivision of DHS. Ms. Noem is the ultimate legal custodian of Petitioner. Ms. Noem is sued in her official capacity.

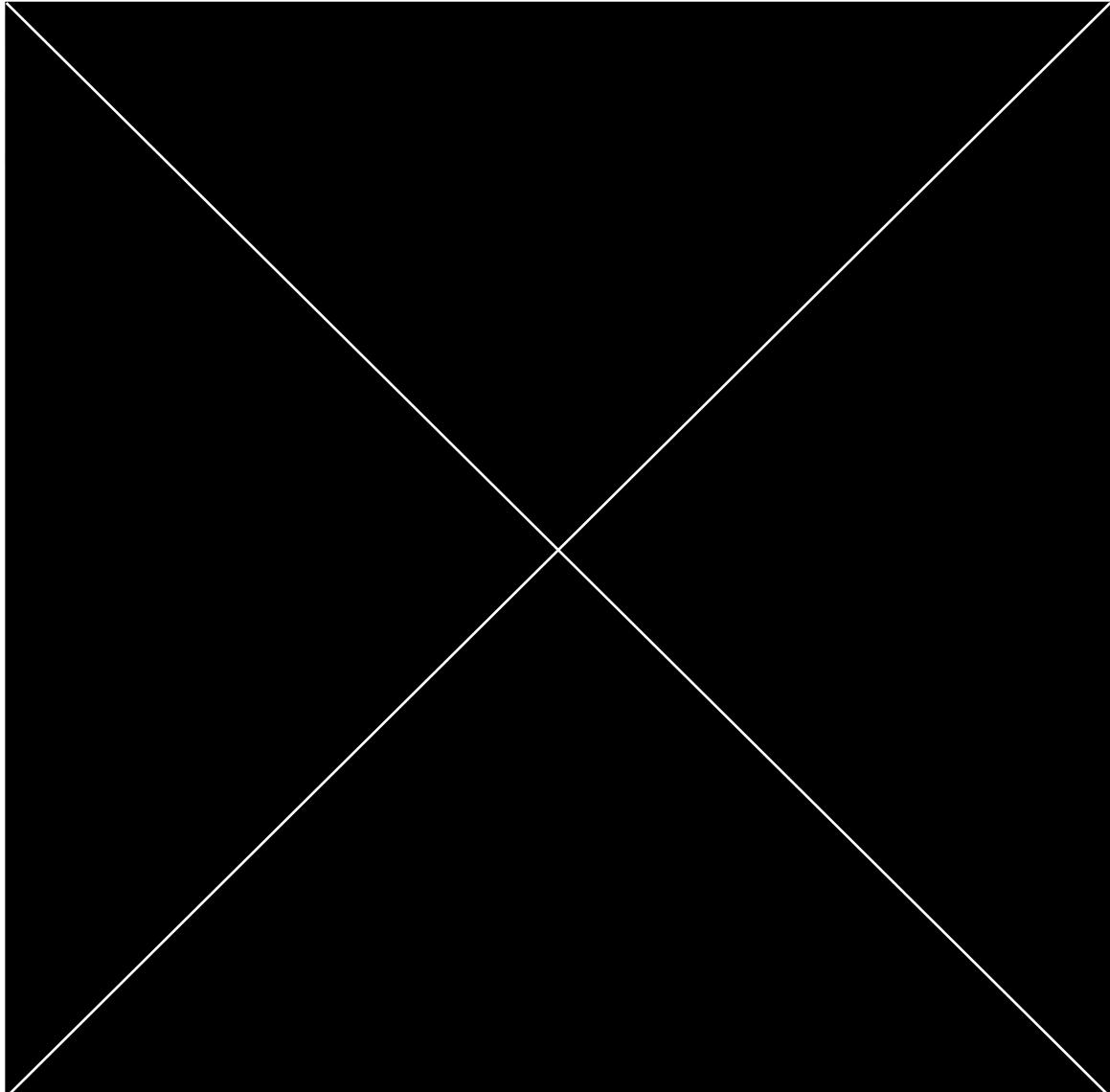
FACTUAL AND PROCEDURAL HISTORY

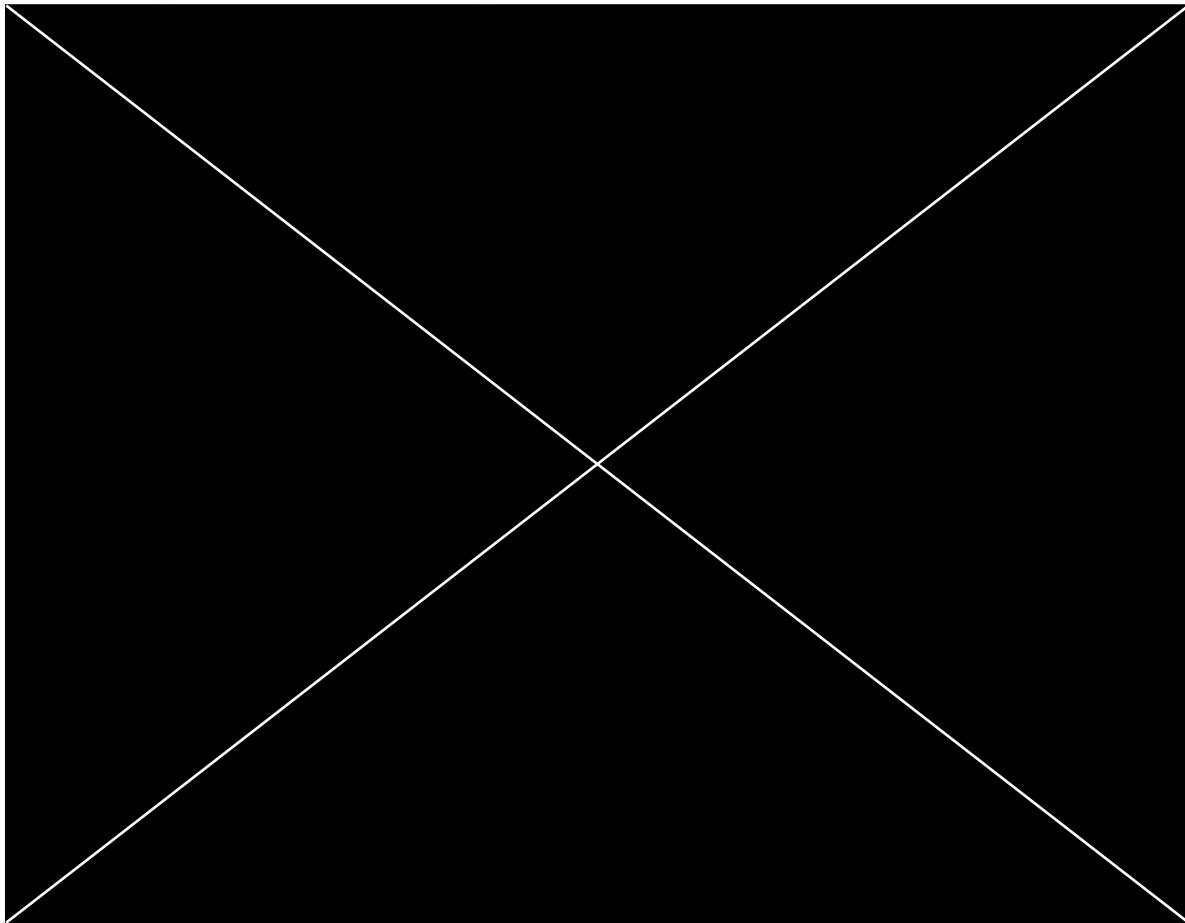
18. Mr. Mehri is a citizen and national of Iran who first entered the United States as a Legal Permanent Resident on April 5, 1987. Mr. Mehri has a United States Citizen Spouse, Michelle Mehri (“Mrs. Mehri”), and six (6) United States Citizen children and stepchildren. See **Exhibit A** for Mr. Mehri’s immigration documentation and proof of his family’s citizenship.

19. In addition to his United States Citizen family members, Mr. Mehri and his Wife took in an abandoned United States Citizen child when he was fifteen years old and raised him to be a productive member of society. See **Exhibit E** for letters from Daniel, the child raised by Mr.

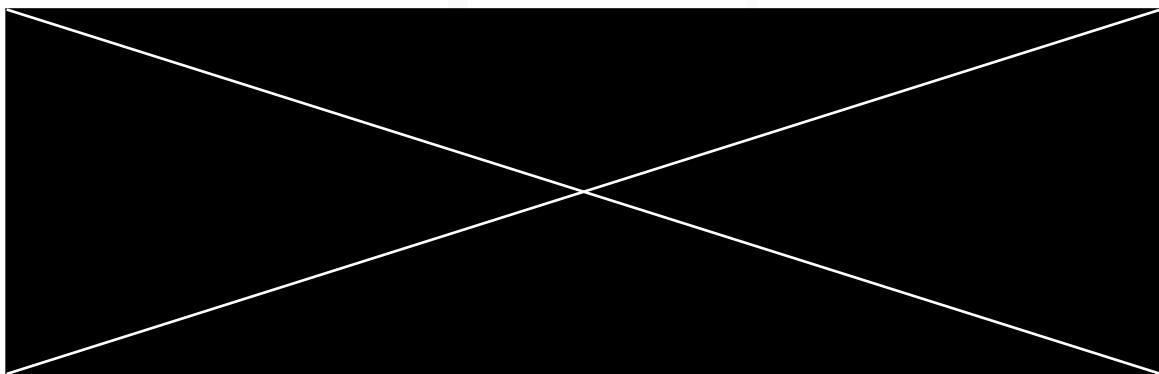
Mehri, and Daniel's Fiancé. Mr. Mehri is an individual of good moral character who positively contributes to his community. See *Id.* for additional letters of support.

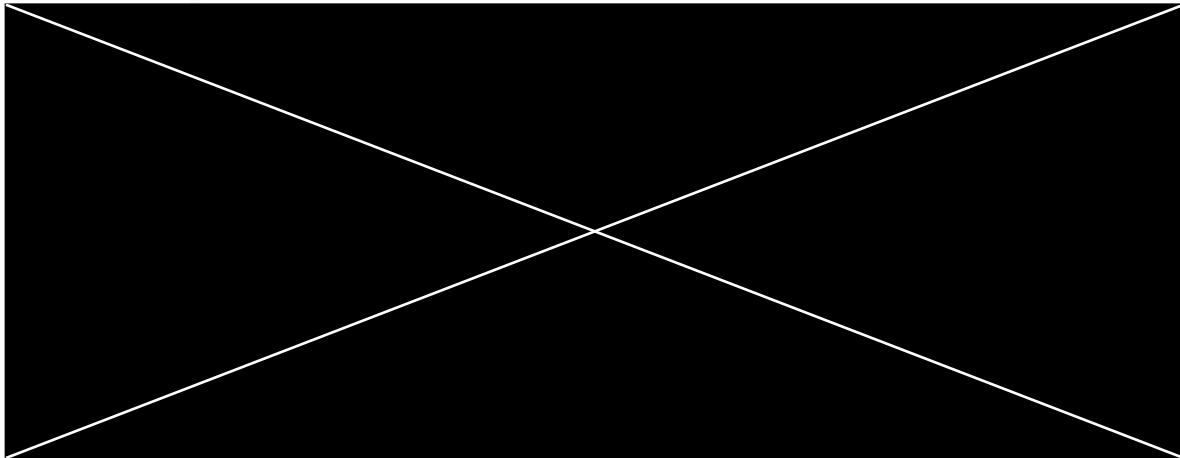
20. When Mr. Mehri was placed in removal proceedings due to a conviction in February 2008, he promptly applied for asylum and withholding of removal, including protection under the Convention Against Torture (CAT), based on the substantial risk he would face if returned to Iran.





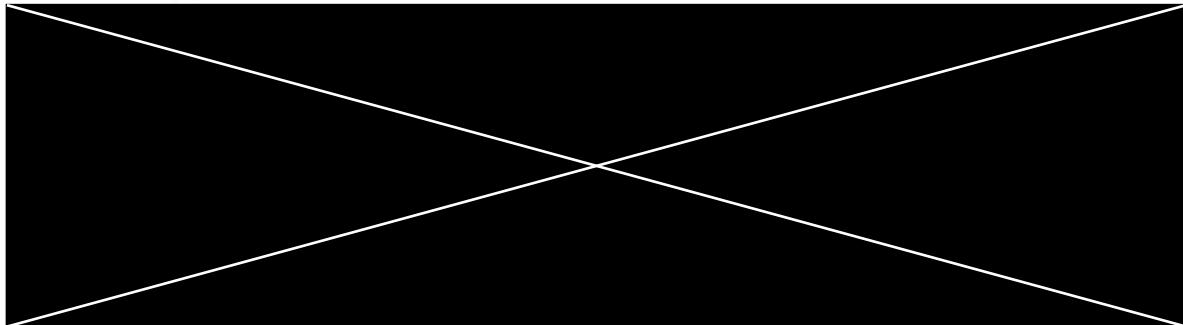
23. The immigration judge presiding over the removal proceedings ordered Mr. Mehri removed to **Iran** and granted deferral of removal under CAT on May 29, 2008. Notably the immigration judge crossed out language in the order stating “or in the alternative to” when indicating the country of removal as Iran and did not list any alternative third countries, 





25. Mr. Mehri was given an Order of Supervision based on his CAT grant. Mr. Mehri most recently completed his Order of Supervision appointment on December 17, 2024, and had another Order of Supervision appointment scheduled for January 15, 2026. Please see **Exhibit F** for the documentation relating to Mr. Mehri's Order of Supervision. Despite his ongoing Order of Supervision, ICE showed up to Mr. Mehri's home, unofficially revoked his Order of Supervision, and unlawfully detained him. The revocation of Mr. Mehri's Order of Supervision was without cause, and he was not provided with an opportunity to review and oppose the arbitrary revocation of his Order of Supervision, against his due process rights.

26. Mr. Mehri is still protected under CAT. The conditions in Iran have not changed so as to undermine the basis of Mr. Mehri's protection under CAT and warrant his detention. In fact, the relationship between the U.S. and Iran, as has been widely reported on international news, has only gotten worse and has even resulted in the U.S. bombing of nuclear plants in Iran, directly relating to the intelligence that Mr. Mehri shared with the United States government. Therefore, there is no foreseeable way that Mr. Mehri could be removed to Iran without removal resulting in torture.



28. Lastly, neither ICE nor DHS has established or provided notice of any third country where he would be free from the risk of torture. [REDACTED]

[REDACTED]
[REDACTED] However, to detain Mr. Mehri indefinitely without any previous identification of a third country, a hearing on that third country, a change in country conditions, or a violation of his Order of Supervision is an arbitrary and unlawful detention that violates Mr. Mehri's constitutional rights.

29. Mr. Mehri is being held at the Krome North Service Processing Center with no significant or lawful likelihood of removal in the reasonably foreseeable future, and continued detention violates his constitutional protections.

30. Mrs. Mehri, Mr. Mehri's United States Citizen Wife, suffers from significant ongoing medical issues related to [REDACTED] which her doctor believes contributes to her ongoing systematic issues. Mrs. Mehri's medical labs reveal the following confirmed and suspected conditions: [REDACTED]

[REDACTED]
[REDACTED] See Exhibit G for Mrs. Mehri's medical documentation. Mr. Mehri is his Wife's main support system and the individual who is primarily responsible for her ongoing medical care.

STATEMENT OF LAW

31. The Due Process Clause of the Fifth Amendment states that “[n]o person shall be ... deprived of life, liberty, or property without due process of law.” U.S. Const. amend. V. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lie at the heart of the liberty that [the Due Process] Clause protects.”² This applies to everyone in this country, including aliens.³

32. To revoke an Order of Supervision, ICE must document the basis for revocation and provide procedural safeguards. As stated in 8 C.F.R. § 241.4(l)(1) “Upon revocation, the alien will be notified of the reasons for revocation of his or her release or parole. The alien will be afforded an initial informal interview promptly after his or her return to Service custody to afford the alien an opportunity to respond and the reasons for revocation stated in the revocation.” DHS has failed to comply with this notification requirement.

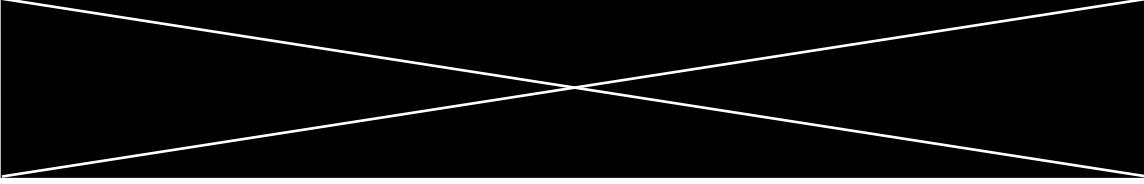
33. Arbitrary or unexplained revocation—especially without identifying a third country for removal—violates both agency regulations and due process protections under the Fifth Amendment. See *Castaneda v. Souza*, 810 F.3d 15, 43 (1st Cir. 2015) (en banc) (recognizing liberty interest in avoiding arbitrary immigration detention); *Diouf v. Napolitano*, 634 F.3d 1081, 1086 (9th Cir. 2011) (recognizing procedural due process rights in prolonged detention under § 241).

² *Zadvydas v. Davis*, 533 U.S. 678, 690, (2001).

³ *Id.* at 693 (“[T]he Due Process clause applies to all ‘persons’ within the United States, including aliens, whether their presence here is lawful [or] unlawful”); *Reno v. Florida*, 507 U.S. 292, 306 (1993) (“the Fifth Amendment entitles aliens to due process of law in deportation proceedings”).

34. Mr. Mehri was suddenly and without explanation detained while on an Order of Supervision. There was no notice to Mr. Mehri nor counsel as to the reasons for revocation of the Order of Supervision. Mr. Mehri was not presented with the ability to confront the reasons for the revocation of his Order of Supervision and remains detained without any explanation.

35. Furthermore, Mr. Mehri is still protected under his grant of Deferral of Removal under CAT. An individual granted Deferral of Removal under the Convention Against Torture (CAT) under 8 C.F.R. § 208.17(a) cannot lawfully be removed to the country to which their removal is deferred. In such cases, the government may not indefinitely detain the individual without identifying an alternative country for removal and establishing that removal is significantly likely in the reasonably foreseeable future.

36. The immigration judge has made a formal determination that Mr. Mehri would more likely than not be subjected to torture if he were removed to Iran, thereby granting him protection under the Convention Against Torture (CAT). This decision was based on a detailed evidentiary record, including credible testimony, corroborating evidence, and extensive documentation of the Iranian government's use of torture against individuals perceived as political dissidents, traitors, or collaborators with foreign governments. 


9. Additionally, pursuant to 8 C.F.R. § 1240.10(f), the immigration judge must identify for the record a country, or countries in the alternative, to which a respondent may be removed if the designated country will not accept them. Here, the immigration judge did not identify *any other* country to which Mr. Mehri could reasonably be removed without being subject

to torture. This is because there is no third country alternative to which Mr. Mehri can be removed without being subject to torture. The silence of the immigration judge in his order is no mistake and should not be taken as error or construed in any other manner. It was an intentional omission, as evidenced by the immigration judge crossing out the words “or in the alternative to” when indicating the country of removal is Iran, as there is not third country alternative. Mr. Mehri will only be safe in the United States.

37. In *Zadvydas*, the Supreme Court held that detention beyond 180 days after a final order of removal is presumptively unreasonable where there is no significant likelihood of removal in the reasonably foreseeable future. *Zadvydas*, 533 U.S. at 701. The Court extended this protection to all noncitizens ordered removed, regardless of inadmissibility. See *Clark v. Martinez*, 543 U.S. 371, 386 (2005).

38. Here, Petitioner’s deferral of removal to Iran remains in effect, and the immigration judge did not designate a third country for removal. No alternative country has been identified by the government because no acceptable, alternative country can be identified. DHS has failed to reopen Mr. Mehri’s CAT proceedings and has failed to obtain a new order of removal with a proper third country designated. ICE and DHS have failed to provide Mr. Mehri or his counsel with any advance notice of a third country of removal and has failed to provide Mr. Mehri and his counsel with the requisite due process to ensure he is not tortured in any third country that he is potentially removed to. This is a stark violation of Mr. Mehri’s constitutional protections under the Fifth Amendment and Mr. Mehri’s rights to due process. Mr. Mehri is entitled to notice and the opportunity to be heard as to his CAT claim as it relates to any alternative country of removal.⁴

⁴ The Supreme Court’s recent decision in Dep’t of Homeland Sec. v. D.V.D., 602 U.S. (2025) (granting stay) does not preclude individual petitions for habeas, it merely precludes the universal injunction on the matter.

39. Moreover, it has been more than 180 days since Mr. Mehri was ordered removed and thus, his continued detention violates the constitutional limits established in Zadvydas.

40. Due process under the Fifth Amendment requires reasonable notice and an opportunity to be heard. Before Mr. Mehri can be removed to any third country, such a hearing must occur. The right to be heard before being condemned to suffer grievous loss of any kind is a principle basic to society. *Mathews v. Eldridge*, 424 U.S. 319 (1976). Mr. Mehri has been in the United States for over thirty-seven (37) years. Any removal from the United States would result in Mr. Mehri's torture and/or death as was already determined by an immigration judge. To now detain Mr. Mehri and attempt to deport him to an unknown and unidentified third country where it has not been determined that Mr. Mehri will be safe is arbitrary, unlawful, and a violation of Mr. Mehri's constitutional and human rights.

IRREPARABLE INJURY

41. Petitioner is currently suffering, and will continue to suffer, irreparable injury as a result of his prolonged, arbitrary, and unjustified detention. His continued confinement, despite being a recipient of protection under the Convention Against Torture and in the absence of any lawful basis for removal, constitutes a gross violation of his due process rights under the Fifth Amendment. The psychological, emotional, and physical toll of indefinite detention without clarity or justification cannot be overstated. Each day that Mr. Mehri remains in custody deepens the trauma and results in further irreparable harm—harm that cannot be remedied by monetary compensation or retrospective relief. The deprivation of liberty in the absence of due process strikes at the core of constitutional protections, and the injury he is suffering is immediate, ongoing, and incapable of being undone.

42. In addition to the harm inflicted directly upon Mr. Mehri, his unlawful detention is causing significant and irreparable harm to his U.S. citizen family members, particularly his spouse and six (6) children. Mr. Mehri has been the emotional and financial cornerstone of his household, and his absence has disrupted the stability and well-being of his entire family. Mr. Mehri is the only source of financial support for his United States Citizen son, Ali Mehri, while he is in school. Ali Mehri is a student at the Metropolitan State University of Denver. Without the financial support that Mr. Mehri provides to his son every month, he will struggle to maintain himself and be able to continue his studies.

43. Mr. Mehri's continued detention places not only him, but his U.S. Citizen family in jeopardy. Mr. Mehri's United States Citizen Spouse is suffering immense hardship as a result of his continued detention. She has lost her sole source of support—the only person who cares for her and assists her with managing her debilitating medical conditions and attending medical appointments

EXHAUSTION OF ADMINISTRATIVE REMEDIES

44. Petitioner is being held in detention in violation of the law. He is entitled to immediate release. He has exhausted all available administrative remedies and there are no further administrative remedies available to him.

EMERGENCY MOTION FOR IMMEDIATE TEMPORARY RESTRAINING ORDER

10. Under Federal Rule of Civil Procedure 65, a court may issue a Temporary Restraining Order ("TRO") preventing Respondents from removing or transferring the Petitioner outside of the jurisdiction pending resolution of the Petition for Writ of Habeas Corpus where the movant demonstrates (1) a likelihood of success on the merits; (2) a likelihood of irreparable injury in the absence of preliminary relief; (3) that the balance of equities tips in the movant's favor; and

(4) that an injunction serves the public interest. *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008); *Fed. R. Civ. P.* 65(b)(1).

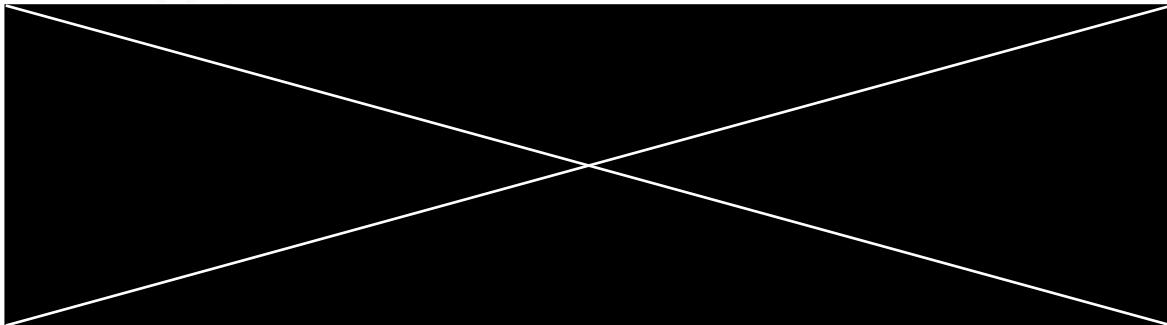
11. Mr. Mehri has demonstrated a substantial likelihood of success on the merits of his habeas petition, as he is unlawfully detained without adequate notice or opportunity to challenge removal, in violation of his constitutional rights to due process and effective assistance of counsel.

12. Without a TRO, Mr. Mehri faces imminent removal from the jurisdiction, which would effectively moot his habeas petition and deny him the opportunity to seek judicial review. Such removal constitutes irreparable harm. See *Winter*, 555 U.S. at 22 (recognizing irreparable injury as “the single most important prerequisite for the issuance of a preliminary injunction”).

13. Furthermore, Mr. Mehri has a constitutional and statutory right to counsel his choice. 8 U.S.C § 1362; *Baires v INS*, 856 F2d 89,91n.2 (9th Cir. 1988) (“We have consistently emphasized the critical role of counsel in deportation proceedings [and] have characterized the alien’s right to counsel of choice as ‘fundamental’ and have warned INS not to treat it casually.”) Mr. Mehri has a longstanding history with the Undersigned, who is uniquely positioned to represent him effectively due to this extensive relationship. Transferring Mr. Mehri outside of this jurisdiction would infringe upon his constitutional rights to effective assistance of counsel and due process.

14. The balance of equities clearly favors Petitioner. The minor inconvenience to Respondents of maintaining custody pending adjudication is outweighed by the harm Petitioner would suffer if removed from the jurisdiction without due process.

15. The public interest is served by upholding constitutional protections, ensuring due process, and maintaining judicial review of executive detention and removal decisions. See *Munaf*, 553 U.S. at 693. [REDACTED]



REQUEST FOR RELIEF

WHEREFORE, Petitioners respectfully request that this Court grant the following relief:

- a. Order the Petitioner be released from custody immediately;
- b. Grant the Petitioner's temporary restraining order preventing him from being removed from the jurisdiction;
- c. Order the government to provide Petitioner with notice and a hearing where he can confront and oppose removal to any alternative third country that agrees to accept him, if one is identified;
- d. Grant an award of attorneys' fees and costs;
- e. Grant such other relief as this Court deems just and appropriate.

Dated: July 3, 2025

Respectfully submitted,

/s/ Linda Osberg-Braun
Fla. Bar No. 827282
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Miami, FL 33161



CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of July, 2025, I served a true and correct copy of the foregoing Petition for Writ of Habeas Corpus and all supporting documents by electronic filing and by mail upon the following individuals:

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