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**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

Delkash, Omid

Petitioner,

v.

Kristi Noem, Secretary of the
Department of Homeland Security;
Todd M. Lyons, Acting Director of
ICE; Ernesto Santa Cruz, Acting
Director of Los Angeles ICE Field
Office; John/Jane Doe, Warden of ICE
Processing Center

Respondents.

Case No.:

**PETITION FOR WRIT OF HABEAS
CORPUS & REQUEST FOR AN
ORDER TO SHOW CAUSE UNDER
28 U.S.C. § 2243**

Petitioner, Omid Delkash (Mr. Delkash), by and through undersigned
counsels, hereby respectfully submits this Petition for Writ of Habeas Corpus
pursuant to Rule 15(a)(1)(A) of the Federal Rules of Civil Procedure.

INTRODUCTION

1. Petitioner, Mr. Delkash, moves this Court to issue a Writ of Habeas Corpus
to compel the Respondents to appear and show cause why the U.S. Department of

1 Homeland Security (DHS), Immigration and Customs Enforcement (ICE), pursuant
2 to Supreme Court of the United States of America (Supreme Court), Ninth Circuit
3 Court of Appeals (Ninth Circuit) precedent, should not be enjoined from holding
4 Mr. Delkash in immigration detention. Mr. Delkash won his application for
5 withholding of removal over 24 years ago and he was released from detention
6 immediately after winning his case. Upon his release, the Petitioner was not placed
7 on an order of supervision (OSUP) and after his release, he was not required to
8 routinely check-in with immigration. Recently, he was detained by ICE around his
9 work. Mr. Delkash was told that he was being detained because he is “Iranian, so
10 we’re picking you up.” After the Petitioner’s transfer to the ICE subcenter in Santa
11 Ana, California, he was told by an Officer Williams that the noncitizen would be
12 “deported to South Sudan.” After Mr. Delkash told Officer Williams that he was a
13 military veteran and provided proof, the Petitioner was transferred to Los Angeles
14 and then to Adelanto.

15 2. Mr. Delkash was not given any due process as required under the Fifth
16 Amendment to the Constitution or 8 C.F.R. § 241.4(l), 8 C.F.R. § 241.5, and
17 241.13(i). If this court does not intervene, Mr. Delkash may be held in indefinite
18 immigration detention.

19 3. The Petitioner also requests this Court’s intervention to prevent his removal
20 to a third country without notice or an opportunity to challenge his removal. At
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1 least one ICE official threatened to remove him to a third country but it is unclear
2 whether this is an idle threat or whether the government is taking actions to secure
3 a travel document for removal to a third country. Failure to provide him this
4 opportunity violates the Petitioner's right to due process
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6 4. Mr. Delkash is a native and citizen of Iran, he and his family fled Iran and
7 applied for asylum. The Petitioner was granted permanent resident status on or
8 about October 2, 1988. He felt responsible for his parents' breakup, so Mr. Delkash
9 enlisted in the United States Army and served as a combat medic. When he was
10 going through basic training he suffered culture shock. He notes that he was the
11 only "brown-skinned person" in his group. Consequently, he was hazed and called
12 racial epithets like "sand nigger" by his fellow servicemembers. On more than one
13 occasion, he was physically attacked by other enlistees. They would put a lock
14 inside of a sock and beat him at night.
15

16 5. He honorably served in the first Gulf War and was given an honorable
17 discharge at the end of his service. Because of this trauma, Mr. Delkash suffered
18 many convictions and in 1998 was diagnosed with a gambling disorder and
19 prolonged depression. He continued to suffer and eventually was placed in
20 removal proceedings.
21

22 6. Mr. Delkash was determined to be a mandatory detainee and he fought his
23 removal from detention. The parties fought over whether proceedings should be
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1 terminated to allow the Petitioner an opportunity to apply for naturalization
2 because of his military service. The court determined that it would be
3 inappropriate to terminated proceedings and it also found Mr. Delkash ineligible
4 for all discretionary forms of relief from removal. At the conclusion of the removal
5 proceedings, the immigration judge granted the Petitioner's application for
6 withholding of removal on January 19, 2001. Thus, immigration was and
7 continues to be unable to remove Mr. Delkash to Iran.
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10 7. Mr. Delkash was released from custody on that same day the immigration
11 judge granted withholding of removal. He was not placed on an order of
12 supervision and he was allowed to remain free, without contact from ICE for over
13 24 years. Approximately, 10 days ago, Mr. Delkash was detained by ICE at or
14 around his place of work. When he was being detained, he was informed that the
15 reason for his detention was that he is from Iran and ICE was going to send him
16 back. However, when he was interviewed at the Santa Ana Field Office, he was
17 told he was being sent to South Sudan. Unfortunately, there is no way to confirm
18 if that is true because ICE has not started any paperwork for a travel document.
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21 **SUMMARY OF THE ARGUMENT**

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23 8. Mr. Delkash is detained by ICE without notice or an opportunity to
24 challenge his detention. At the time he was detained, he had completed his post-
25 removal period by nearly 24 years and was not on an order of supervision with ICE.
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1 As such, the petitioner risks indefinite detention because he is a citizen of Iran, a
2 traditionally recalcitrant country.

3 9. ICE's failure to follow its regulations relating to noncitizens on an order of
4 supervision violates his right to due process under the Fifth Amendment to the
5 United States Constitution and the protections afforded to him under the
6 Administrative Procedures Act. Because ICE has not proven that Mr. Delkash
7 violated a condition of release and has not established a substantial likelihood that
8 Iran will accept the Petitioner, judicial intervention is needed to prevent indefinite
9 detention.
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12 10. He also seeks immediate release and individualized notice and an
13 opportunity to contest any removal to a third country. First, there is no authority
14 that mandates detention when ICE is attempting to remove a noncitizen to a third
15 country. Even less lawful is detaining a noncitizen without notice when he is not
16 on an order of supervision. Second, the constitution, applicable regulations and
17 common decency require the noncitizen receive an opportunity to contest removal
18 to a third country.
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21 **PARTIES**

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23 11. Petitioner Mr. Delkash is a fifty-four-year-old native and citizen of Iran. He
24 was granted withholding of removal on January 19, 2021. He was immediately
25 released from custody and never placed on an order of supervision.
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1 12. Respondent Kristi Noem sued in her official capacity as the Secretary of the
2 Department of Homeland Security (DHS). She is the executive officer who has
3 been given authority to manage and control the Immigration and Customs
4 Enforcement. As such, she would be the ultimate legal custodian of Mr. Delkash.
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6 13. Respondent Todd M. Lyons is sued in his official capacity as the acting
7 director of U.S. Immigration and Customs Enforcement (ICE).
8

9 14. Respondent Ernesto Santa Cruz, the Los Angeles Field Office Director of
10 ICE is sued in his official capacity. In his official capacity, he is be a legal custodian
11 over Mr. Delkash because he is responsible for providing a detailed worksheet,
12 including a recommendation on continued detention or release, so that the
13 Headquarters Custody Determination Unit can make the final decision on continued
14 detention.
15

16 15. Respondent John/Jane Doe, is the warden of the Adelanto Detention Center.
17 S/he is responsible for Mr. Delkash's detention.
18

19 **JURISDICTION**

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21 16. This Court has jurisdiction under 28 U.S.C. § 2241, Article I § 9, Clause 2
22 of the United States Constitution (Suspension Clause), and 28 U.S.C. § 1331, as
23 Mr. Delkash has been ordered to be re-detained and will be in custody under color
24 of the authority of the United States, and such custody is in violation of the
25 Constitution, laws, regulations, and, or treaties of the United States.
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1 17. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory
2 Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651,
3 to protect Mr. Delkash's rights under the Due Process Clause of the Fifth
4 Amendment to the United States Constitution, and under applicable Federal law.
5

6 **REQUIREMENTS OF 28 U.S.C. § 2243**

7 18. The Court must grant the petition for writ of habeas corpus or issue an
8 order to show cause (OSC) to the respondents "forthwith," unless the petitioner is
9 not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the
10 Court must require respondents to file a return "within *three days* unless for good
11 cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis
12 added).
13

14 19. Courts have long recognized the significance of the habeas statute in
15 protecting individuals from unlawful detention. The Great Writ has been referred
16 to as "perhaps the most important writ known to the constitutional law of England,
17 affording as it does a *swift* and imperative remedy in all cases of illegal restraint or
18 confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).
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21 **VENUE**

22 20. Venue is proper in the Central District of California Court because Mr.
23 Delkash was detained in the ICE detention center, in Adelanto, California, and the
24 records and witnesses pertinent to her claim are likely to be found there. A
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1 substantial part of the events or omissions giving rise to Mr. Delkash's claim
2 occurred in the Central District of California.

3
4 21. Adelanto, California, is also within the geographical jurisdiction of this
5 Court. Several of the Respondents reside and work in their official capacity in this
6 District. 28 U.S.C. 1391(e). Furthermore, it is a convenient forum for both the
7 Respondents and Mr. Delkash. *Branden v. 30th Judicial Circuit Court*, 410 U.S.
8 484, 493–94 (1973).
9

10 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

11 22. “On habeas review under § 2241, exhaustion is a prudential rather than a
12 jurisdictional requirement.” *Singh v. Holder*, 638 F.3d 1196, 1203, n.3 (9th Cir.
13 2011). However, more importantly, in this case, there are no administrative
14 remedies available prior to filing the habeas petition. *See generally Zadvydas*, 533
15 U.S. 678. Mr. Delkash was released and not placed on an order of supervision
16 under 8 C.F.R. § 241.4 and 8 C.F.R. § 241.5. He has not requested release from
17 any court prior to this petition. Thus, there are no other procedural remedies for
18 Mr. Delkash to pursue outside of this petition.
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21 **STATEMENT OF FACTS & PROCEDURAL HISTORY**

22
23 23. Mr. Delkash is a native and citizen of Iran, he and his family fled Iran and
24 applied for asylum. The Petitioner was granted permanent resident status on or
25 about October 2, 1988. He felt responsible for his parents' breakup, so Mr. Delkash
26

1 enlisted in the United States Army and served as a combat medic. When he was
2 going through basic training he suffered culture shock. He notes that he was the
3 only “brown-skinned person” in his group. Consequently, he was hazed and called
4 racial epithets like “sand nigger” by his fellow servicemembers. On more than one
5 occasion, he was physically attacked by other enlistees. They would put a lock
6 inside of a sock and beat him at night.
7

8
9 24. He honorably served in the first Gulf War and was given an honorable
10 discharge at the end of his service. Because of this trauma, Mr. Delkash suffered
11 many convictions and in 1998 was diagnosed with a gambling disorder and
12 prolonged depression. He continued to suffer and eventually was placed in
13 removal proceedings.
14

15 25. Mr. Delkash was determined to be a mandatory detainee and he fought his
16 removal from detention. The parties fought over whether proceedings should be
17 terminated to allow the Petitioner an opportunity to apply for naturalization
18 because of his military service. The court determined that it would be
19 inappropriate to terminated proceedings and it also found Mr. Delkash ineligible
20 for all discretionary forms of relief from removal. At the conclusion of the removal
21 proceedings, the immigration judge granted the Petitioner’s application for
22 withholding of removal on January 19, 2001. Thus, immigration was and
23 continues to be unable to remove Mr. Delkash to Iran.
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1 26. Mr. Delkash was released from custody on that same day the immigration
2 judge granted withholding of removal. He was not placed on an order of
3 supervision and he was allowed to remain free, without contact from ICE for over
4 24 years. Approximately, 10 days ago, Mr. Delkash was detained by ICE at or
5 around his place of work. When he was being detained, he was informed that the
6 reason for his detention was that he is from Iran and ICE was going to send him
7 back. However, when he was interviewed at the Santa Ana Field Office, he was
8 told he was being sent to South Sudan. Unfortunately, there is no way to confirm
9 if that is true because ICE has not started any paperwork for a travel document.
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12 27. This petition followed.
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14 LEGAL ARGUMENT

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16 28. “In our society liberty is the norm, and detention prior to trial or without
17 trial is the carefully limited exception.” *United States v. Salerno*, 481 U.S. 739,
18 755 (1987). Civil detention violates the Due Process Clause except “in certain
19 special and narrow nonpunitive circumstances, where a special justification, such
20 as harm-threatening mental illness, outweighs the individual’s constitutionally
21 protected interest in avoiding physical restraint.” *Zadvydas v. Davis*, 533 U.S. 678,
22 690 (2001) (citations omitted).
23

24 29. 8 U.S.C. § 1231(a)(6) authorizes the detention of noncitizens who have been
25 issued a final order of removal but the noncitizen’s removal is unlikely. While
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1 noncitizens with a final order of removal detained under § 1231 are typically subject
2 to immediate removal, some noncitizens, such as Mr. Delkash, cannot be removed
3 because the person's home country is classified as a recalcitrant country. *See*
4 *generally Chhoeun v. Marin*, 306 F.Supp.3d 1147 (C.D. Ca. 2019).
5

6 30. In this case, the Petitioner was released without an order of supervision after
7 the immigration judge granted withholding of removal on January 19, 2001. Both
8 parties waived appeal; thus, initiating the post-removal period on January 19, 2001.
9 His release was not authorized by an immigration judge, instead it was ICE that
10 initiated the release. Despite being released without an order of supervision, the
11 Petitioner became subject to release conditions under the appropriate regulations.
12 *See* 8 C.F.R. § 241.4(l) *as cited in Noem v. Abrego Garcia*, -- U.S. --, 145 S.Ct. 1017,
13 1019 (2025) (SOTOMAYOR, J. statement on the disposition) *and* § 241.13(i).
14

15 31. The Fifth Amendment recognizes that even noncitizens have a liberty interest
16 in not being arbitrarily redetained. In *Jorge M. F. v. Wilkinson*, 534 F.Supp.3d 1050,
17 1054 (N.D. Cal. April 14, 2021), the district court granted an emergency temporary
18 restraining order (TRO) preventing the government from re-detaining the petitioner
19 without providing sufficient notice and an opportunity for a hearing on the legality
20 of detention. To the extent Mr. Delkash is being detained because he is from Iran,
21 that is clearly unconstitutional. To the extent that he is being detained because he is
22 being removed to a third country, a detention in this context, particularly when no
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1 order of supervision was initiated is not mandatory and is thus, subject to due process
2 protections.

3 32. In this case, the ICE officials violated 8 C.F.R. § 241.4(l) and 241.13(i).
4 Failure to follow these procedures offends the basic notions of Due Process under the
5 Fifth Amendment to the Constitution. *See Mathews v. Eldridge*, 424 U.S. 319
6 (1976). Additionally, ICE officials have violated Mr. Delkash's rights under the
7 Administrative Procedures Act (APA). *See* 5 U.S.C. § 702. The APA is in place to
8 prohibit an agency from taking an unlawful action.
9

10 33. Additionally, the Petitioner fears that he will be subject to removal to a third
11 country without notice or an opportunity to challenge this removal to a country that
12 he has no familiarity. ICE has taken the position that in some cases, it needs to
13 provide *any* notice or opportunity to challenge effectuating removal to a third
14 country. *See* Noem, Kristi, Guidance Regarding Third Country Removals, DHS
15 (Mar. 30, 2025). Removal without individualized notice or an opportunity to be
16 heard clearly violates the Petitioner's regulatory and statutory rights. *See, e.g.,*
17 *Nasrallah v. Barr*, 590 U.S. 573, 580 (2020); FARRA, Pub. L. No. 105-277, Div. G,
18 Title XXII, 112 Stat. 2681 (1998) (codified as Note to 8 U.S.C. § 1231) *and* 8 C.F.R.
19 § 1208.17(b)(2) (requiring IJs to inform an individual granted CAT deferral that they
20 "may be removed at any time to another country *where he or she is not likely to be*
21 *tortured*") (emphasis added).
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FIRST CLAIM FOR RELIEF

Mr. Delkash's order of supervision was revoked in violation of his due process rights because DHS has not provided a valid statutory or regulatory reason for revoking it.

34. Mr. Delkash re-alleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

35. If Respondents are allowed to detain Mr. Delkash without notice or an opportunity to challenge the detention, it will violate his rights guaranteed by the Due Process Clause of the Fifth Amendment of the U.S. Constitution.

36. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty [the Due Process] Clause protects." *Zadvydas*, 533 U.S. at 690. Additionally, the Ninth Circuit agrees that the noncitizen's "private interest at issue here is 'fundamental': freedom from imprisonment is at the 'core of the liberty protected by the Due Process Clause.'" *Hernandez v. Sessions*, 872 F.3d 976, 993 (9th Cir. 2017) (internal citation omitted). Historical precedent is quite strong in recognizing that the Petitioner has a significant private liberty interest.

37. The Petitioner does not dispute that, if certain conditions are present, he is subject to removal to a third country. However, no constitutional, statutory, or regulatory provision *mandates* re-detention after the removal period expired. In this case, the removal period began on January 19, 2001. ICE chose to release the

1 Petitioner from immigration custody and did not place him on an order of
2 supervision. Then, over 24 years later, the Petitioner was arrested by ICE because
3 he is from “Iran.” This rationale is not a notice nor opportunity to challenge
4 detention. Further, and more shockingly, this appears to be blatant ethnic and
5 racial discrimination. Even assuming there is a likelihood Mr. Delkash will be
6 issued a travel document; it is not mandatory that he is detained. This is
7 particularly true when considering that the Petitioner was not placed on OSUP
8 under 8 C.F.R. § 241.5.
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11 38. As of filing this petition, Mr. Delkash ICE has not been provided a reason
12 for his detention and he has not been processed to receive a travel document.
13 Clearly, there is no other constitutional or statutory justification for this detention.
14

15 **SECOND CLAIM FOR RELIEF**

16 **ICE violated the Petitioner’s rights under the APA**

17 39. Mr. Delkash re-alleges and incorporates by reference each and every
18 allegation contained in the preceding paragraphs as if set forth fully herein.
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20 40. The APA was enacted to ensure that a person “suffering [a] legal wrong
21 because of agency action,” or “adversely affected or aggrieved by agency action
22 within the meaning of a relevant statute, is entitled to judicial review.” 5 U.S.C.
23 702. 702 subsections “hold unlawful and set aside agency actions, findings and
24 conclusions” that meet one or more of six standards: (1) Arbitrary, capricious, an
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1 abuse of discretion, or otherwise not in accordance with the law; (2) Contrary to
2 constitutional right, power, privilege or immunity; (3) In excess of statutory
3 jurisdiction, authority, or limitations, or short of statutory right; (4) Without
4 observance of procedures required by law; (5) Unsupported by substantial
5 evidence in a case subject to [5 U.S.C. §§ 556 and 557] or otherwise reviewed on
6 the record of an agency hearing provided by statute or rule; or (6) Unwarranted by
7 the facts to the extent that facts are subject to trial de novo by the reviewing court.
8
9 5 U.S.C. § 702(2)(A)-(F), *and see also Citizens to Preserve Overton Park, Inc. v.*
10 *Volpe*, 401 U.S. 402, 413-14 (1971) (citing 5 U.S.C. § 706(2)(A)-(D)) (“In all cases
11 agency action must be set aside if the action was ‘arbitrary, capricious, an abuse of
12 discretion or otherwise not in accordance with law’ or if the action failed to meet
13 statutory, procedural, or constitutional requirements.”).

16 41. Assuming the regulations apply after ICE released Mr. Delkash without an
17 order of supervision, the government violated the Petitioner’s rights under the APA
18 under subsections A-F because both 8 C.F.R. § 241.4 and 8 C.F.R. § 241.13 require
19 the service to provide some rationale to revoke the order of supervision. That did
20 not happen here. Specifically, under 8 C.F.R. § 241.4(l) ICE must demonstrate
21 some rationale for redetaining the noncitizen such as the person violated a law, was
22 engaged in some derogative conduct, or he violated a condition of release.
23
24 Similarly, 8 C.F.R. § 241.13(i)(2) requires “the Service [to] determine[] that there
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1 is a *significant likelihood* that the alien may be removed in the reasonably
2 foreseeable future.” (emphasis added).

3 42. Again, it is difficult to determine whether, and to what extent to 8 C.F.R. §
4 241.4 and § 241.13 apply to the Petitioner because he was never placed on an order
5 of supervision. However, it would be perverse if the government was rewarded for
6 not placing Mr. Delkash on an order of supervision when he was released from
7 immigration custody by allowing ICE to redetain the Petitioner without notice or
8 an opportunity to challenge the detention. According to 8 C.F.R. § 241.5(a), a
9 noncitizen released under 8 C.F.R. § 241.4 *shall* be placed on an order of
10 supervision. ICE chose not to follow its regulations when it released Mr. Delkash.
11 Its failure to follow its regulations is no excuse for violating Mr. Delkash’s
12 constitutional rights or the regulatory rights he would have received, *had the*
13 *government done its job*. Recently, courts have determined that ICE’s failure to
14 follow its regulatory obligations when revoking an order of supervision is grounds
15 for immediate release. *See Ceesay v. Kurzdorfer*, -- F.Supp.3d--, No. 25-CV-267-
16 LJV, 2025 WL 1284720, at *21 (W.D.N.Y. May 2, 2025). This court should
17 follow *Ceesay* and hold that Mr. Delkash is being held contrary to his
18 Constitutional and regulatory rights under the APA.
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THIRD CLAIM FOR RELIEF

**ICE must provide the Petitioner individualized notice and an opportunity to
express fear of removal to a third country**

43. At this point, ICE has not begun processing a travel document to remove Mr. Delkash to a third country. It should be noted that in *no regulation, statute, or* provision of the constitution is it *mandatory* that Mr. Delkash be detained. More troubling, ICE has taken the position that it does not need to the Petitioner individualized notice or an opportunity to challenge removal to a third country in all cases. *See* Noem, Kristi, Guidance Regarding Third Country Removals, DHS (Mar. 30, 2025). Removal without individualized notice or an opportunity to be heard clearly violates the Petitioner’s regulatory and statutory rights. *See, e.g., Nasrallah v. Barr*, 590 U.S. 573, 580 (2020); FARRA, Pub. L. No. 105-277, Div. G, Title XXII, 112 Stat. 2681 (1998) (codified as Note to 8 U.S.C. § 1231) *and* 8 C.F.R. § 1208.17(b)(2) (requiring IJs to inform an individual granted CAT deferral that they “may be removed at any time to another country *where he or she is not likely to be tortured*”) (emphasis added).

44. Should the government secure a travel document to send the Petitioner to a third country, he must be given individualized notice and an opportunity to challenge removal to a third country that may torture him. The government’s assurances that a noncitizen would not be tortured without an individualized opportunity to challenge removal is unavailing because it is impossible to the

1 government to account for *all possible reasons and/or parties* that might torture an
2 individual. *See, e.g.*, 8 C.F.R. § 1208.16(c) (discussing IJs' individualized
3 assessment of applicants' CAT claims); 8 C.F.R. § 1208.17 (same, as well as
4 individualized notice to individuals with CAT protection). Failure to provide this
5 most basic protection violates Mr. Delkash's rights under the Fifth Amendment.
6

7
8 **REQUEST FOR RELIEF**

9 Mr. Delkash herein respectfully requests that this Court enter the following
10 findings and order the following relief:
11

- 12 1) Assume jurisdiction over this matter;
- 13 2) Prohibit ICE from transferring the Petitioner to another detention center
14 outside the court's jurisdiction until a decision has been rendered;
- 15 3) Issue an Order to Show Cause ordering Respondents to show cause why this
16 Petition should not be granted within three days.
- 17 4) Declare Mr. Delkash's detention by the Respondents to be unconstitutional
18 and in violation of the Immigration and Nationality Act;
19
- 20 5) Order Mr. Delkash's Immigration and Customs Enforcement to release him
21 from custody. If the government chooses to redetain Mr. Delkash, provide
22 advance notice and an opportunity to have a hearing before an IJ or another
23 independent jurist to determine the lawfulness of re-detention prior to taking
24 the Petitioner into custody;
- 25 6) Order Immigration and Customs Enforcement to not remove Mr. Delkash to
26 a third country without an individualized opportunity to assert his fear of
removal to this country.

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2 7) Grant Mr. Delkash attorney's fees pursuant to the Equal Access to Justice
3 Act, 28 U.S.C. § 2412; and

4 8) Grant any other and further relief that this Court may deem fit and proper.
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7 DATED: July 4, 2025
8 Long Beach, CA
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10 Respectfully submitted,
11

12 /s/ Andres Ortiz
13 Andres Ortiz, Esq.
14 Attorney for the Petitioner
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VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Omid Delkash, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 4th day of July, 2025.

/s/ Andres Ortiz
Andres Ortiz, Esq.
Attorney for the Petitioner

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing Petition for Writ of Habeas Corpus in *Omid Delkash v. Noem et. al*, with the Clerk of the Court for the Central District of California by using the appellate CM/ECF July 4, 2025, for filing and transmittal of Notice of Electronic Filing

/s/ Andres Ortiz
Andres Ortiz, Esq.
Attorney for Petitioner