

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

REZA YAGHOUBI YEGANEH,

Petitioner,

v.

Civil Action No. 1:25-CV-00121-H

WARDEN, BLUEBONNET DETENTION  
FACILITY, et al.

Respondent.

**APPENDIX IN SUPPORT OF RESPONSE IN OPPOSITION**

COME(S) NOW Respondent(s), by and through the United States Attorney for the Northern District of Texas, and pursuant to Local Rule 7.1(i), file this separate, self-contained Appendix, consisting of Exhibit A and Attachments 1-8 in support of Respondent's Response in Opposition.

<u>Tab</u>	<u>Exhibit</u>	<u>Page(s)</u>
A.	Declaration of Ryan Lankford.....	APP. 001-004
1.	Judgment and Sentence in a Criminal Case, <i>The State of Oklahoma v. Reza Yaghoubi Yeganeh</i> , Cause No. CF-2007-6933, District of Oklahoma County (Sep 5, 2008).....	APP. 005-008
2.	U.S. Department of Homeland Security, <i>Notice to Appear (Form I-862)</i> (Oct 9, 2013).....	APP. 009-012
3.	Judgment and Sentence in a Criminal Case, <i>The State of Oklahoma v. Reza Yaghoubi Yeganeh</i> , Cause No. CF-2013-3699, District of Oklahoma County (Apr 2, 2014).....	APP. 013-021

4. U.S. Department of Homeland Security – U.S. Immigration and Customs Enforcement, *Additional Charges of Inadmissibility/Removability (Form I-261)* (Dec 8, 2014).....APP. 022-035
5. U.S. Immigration Court, *Order in the Removal Case of Reza Yaghoubi Yeganeh* (Dec 9, 2014).....APP. 036-038
6. U.S. Department of Justice, Executive Office for Immigration Review, *Order of the Immigration Judge* (Mar 21, 2025) .....APP. 039-041
7. U.S. Department of Justice, Executive Office for Immigration Review, *Order of the Immigration Judge* (Apr 24, 2025).....APP. 042-044
8. U.S. Department of Homeland Security – U.S. Immigration and Customs Enforcement, *Decision to Continue Detention* .....APP. 045-048

Respectfully submitted,

NANCY E. LARSON  
ACTING UNITED STATES ATTORNEY

/s/ Ann E. Cruce-Haag  
ANN E. CRUCE-HAAG  
Assistant United States Attorney  
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Attorneys for Respondent

**CERTIFICATE OF SERVICE**

On August 12, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic

case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Ann E. Cruce-Haag  
ANN E. CRUCE-HAAG  
Assistant United States Attorney

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION**

Reza Yaghoubi Yeganeh

Petitioner,

v.

U.S. Immigration and Customs  
Enforcement.

Respondent.

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Case No. 1:25-cv-00121

DECLARATION OF RYAN LANKFORD

In accordance with the provisions of Section 1746 of Title 28, United States Code,

I, the undersigned, Ryan J. Lankford, do hereby make the following declaration, under penalty of perjury in the above-styled and numbered cause:

1. I, Ryan J. Lankford, am presently employed by the United States Department of Homeland Security (“DHS” or the “Department”), Immigration and Customs Enforcement (“ICE”), in the position of Deportation Officer.
2. My duties as a Deportation Officer include the review of alien files and monitoring the custody status of aliens who have a final order of removal. In carrying out this duty, I am responsible for monitoring the progress of obtaining travel documents necessary for removing aliens to the designated country of removal. As a Deportation Officer, I have access to records maintained in the ordinary course of business by ICE.

3. I am presently the Deportation Officer assigned to the case of Reza Yaghoubi Yeganeh, alien file number  a native and citizen of Iran. My involvement with YEGANEH's case has included monitoring his detention history, seeking to obtain travel documents, and reviewing custody determinations made in his case.
4. On or about October 9, 2013, YEGANEH was placed into immigration court proceedings, and on December 9, 2014, an immigration judge ordered that he be deported to Iran. YEGANEH did not file an appeal of this decision. The case was then sent to Enforcement and Removal Operations ("ERO") for execution of the removal order.
5. On or about March 10, 2015, YEGANEH was released from ICE custody under an order of supervision because ERO was unable to remove him to Iran at that time.
6. On or about March 18, 2025, YEGANEH was taken into ICE custody and served removal paperwork.
7. At the time of his arrest, YEGANEH was informed that he would be detained because he was subject to a final order of removal and there is now a likelihood of removal to Iran. YEGANEH was informed that the reason for his revocation was that ICE believed that he could be removed to Iran. YEGANEH was given the opportunity to respond during this informal interview.
8. On or about March 20, 2025, Petitioner filed a motion to reopen and a stay of removal. On March 21, 2025, an immigration judge granted the stay of removal.

pending the outcome of the motion to reopen. On April 24, 2025, an immigration judge denied the motion to reopen.

9. On June 16, 2025, ERO issued a decision to continue YEGANEH's detention. ERO determined that his criminal history demonstrated he is a danger, and his removal was likely in the reasonably foreseeable future due to ongoing efforts to effect removals to Iran.
10. On July 14, 2025, ERO sent a travel document request to Headquarters Removal International Operations ("HQRIO").
11. On July 15, 2025, HQRIO reviewed and cleared the travel document request packet.
12. On July 22, 2025, ERO mailed a travel document request to the Iranian Interest Section, along with a copy of YEGANEH's Iranian birth certificate.
13. If the request for a travel document is denied by the Iranian Interest Section, HQRIO will likely explore the possibility of third-country removal.

Sworn to and subscribed this 12th day of August, 2025.

**RYAN J  
LANKFORD**

Digitally signed by RYAN  
J LANKFORD  
Date: 2025.08.12  
08:27:40 -05'00'

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Ryan J. Lankford  
Deportation Officer  
Department of Homeland Security  
Immigration and Customs Enforcement

# **ATTACHMENT 2**

U.S. Department of Homeland Security

Notice to Appear

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID : [Redacted] FIN : [Redacted] File No: [Redacted]
DOB: [Redacted] Event: [Redacted]

In the Matter of:

Reza Yeganeh YAGHOUBI

Respondent:

currently residing at:

TULSA COUNTY JAIL 300 N. DENVER AVE , TULSA OKLAHOMA 74103

(918) 596-8900

(Number, street, city and ZIP code)

(Area code and phone number)

- 1. You are an arriving alien.
2. You are an alien present in the United States who has not been admitted or paroled.
3. You have been admitted to the United States, but are removable for the reasons stated below.

12/19/14 RG

The Department of Homeland Security alleges that you:

- 1. You are not a citizen or national of the United States;
2. You are a native of Iran and a citizen of Iran;
3. You claim you entered the United States at or near El Paso, Texas, on or about August 01, 1994, without being inspected, admitted or paroled by an Immigration Officer;
4. Your status was adjusted to that of lawful permanent resident (COA: AS7) on 09/17/2009, under section 208 of the Act;
5. You were, on September 05, 2008, convicted in the District Court of Oklahoma County, State of Oklahoma, for the offense of EMBEZZLEMENT, in violation of 21 O.S. 1451-1463;
6. You were, on September 05, 2008, convicted in the District Court of Oklahoma County, State of Oklahoma, for the offense of OBTAINING PROPERTY UNDER FALSE PRETENSES, in violation of 21 O.S. 1541.2.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

See Continuation Page Made a Part Hereof

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
Section 235(b)(1) order was vacated pursuant to: 8CFR 208.30(f)(2) 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at: 1100 Commerce Street, Room 1060 Dallas TEXAS US 75242

(Complete Address of Immigration Court, including Room Number, if any)

on a date to be set at a time to be set to show why you should not be removed from the United States based on the charge(s) set forth above.

P. A. Branstetter SDDO

(Signature and Title of Issuing Officer)

Date: October 9, 2013

Tulsa, Oklahoma

(City and State)

See reverse for important information

Form I-862 (Rev. 08/01/07)

Exh 1

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 3.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents, which you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.

At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear and that you are inadmissible or removable on the charges contained in the Notice to Appear. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge.

You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of departure voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

Failure to appear: You are required to provide the DHS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to one of the offices listed in 8 CFR 241.16(a). Specific addresses on locations for surrender can be obtained from your local DHS office or over the internet at http://www.ice.gov/about/dro/contact.htm. You must surrender within 30 days from the date the order becomes administratively final, unless you obtain an order from a Federal court, immigration court, or the Board of Immigration Appeals staying execution of the removal order. Immigration regulations at 8 CFR 241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Act.

Request for Prompt Hearing

To expedite a determination in my case, I request an immediate hearing. I waive my right to a 10-day period prior to appearing before an immigration judge.

Before:

(Signature of Respondent)

Date:

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on October 9, 2013, in the following manner and in compliance with section 239(a)(1)(F) of the Act.

[x] in person [ ] by certified mail, returned receipt requested [ ] by regular mail

[ ] Attached is a credible fear worksheet.

[x] Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the English language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

R. Yaghoubia (Signature of Respondent if Personally Served)

A. 7971 BRAMANTE (Signature and Title of officer)

U.S. Department of Homeland Security

Continuation Page for Form 1862

Alien's Name Reza Yeganeh YAGHOUBI	File Number 	Date October 9, 2013
ON THE BASIS OF THE FOREGOING, IT IS CHARGED THAT YOU ARE SUBJECT TO REMOVAL FROM THE UNITED STATES PURSUANT TO THE FOLLOWING PROVISION(S) OF LAW: =====		
Section 237(a)(1)(A) of the Immigration and Nationality Act (Act), as amended, in that at the time of entry or of adjustment of status, you were within one or more of the classes of aliens inadmissible by the law existing at such time, to wit: aliens who have been convicted of, or who admit having committed, or who admit committing acts which constitute the essential elements of a crime involving moral turpitude (other than a purely political offense) or an attempt or conspiracy to commit such a crime under Section 212(a)(2)(A)(i)(I) of the Act.		
Signature  P. 3660 A. BRANSTETTER	Title SDDO	

3 of 3 Pages

# **ATTACHMENT 4**

**U.S. Department of Homeland Security**  
U.S. Immigration and Customs Enforcement

**ADDITIONAL CHARGES OF INADMISSABILITY/REMOVABILITY**

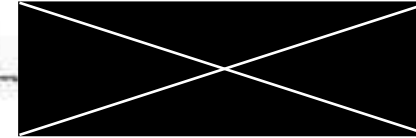
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**In Removal proceedings under Section 240 of the Immigration and Nationality Act.**

**In the Matter of:**

Alien/Respondent: YAGHOUBI, Reza Yeganeh

File No:



**ADD THE FOLLOWING CHARGES to the Notice to Appear (NTA) dated October 9, 2013.**

Section 237(a)(2)(A)(iii) of the Immigration and Nationality Act (Act), as amended, in that, at any time after admission, you have been convicted of an aggravated felony as defined in Section 101(a)(43)(G) of the Act, an offense relating to theft (including the receipt of stolen property) for which the term of imprisonment is at least one year.

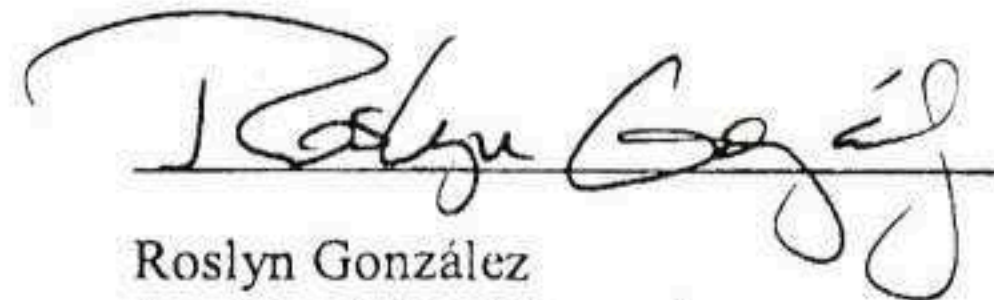
Section 237(a)(2)(A)(i) of the Immigration and Nationality Act, as amended, in that you have been convicted of a crime involving moral turpitude committed within five years after admission for which a sentence of one year or longer may be imposed.

**ADD THE FOLLOWING FACTUAL ALLEGATIONS to the Notice to Appear (NTA) dated October 9, 2013.**

7. You were, on April 2, 2014, convicted in the District Court of Oklahoma County, for the offense of Robbery in the Second Degree, in violation of 21 O.S. 799, and sentenced to 10 years imprisonment for that offense.
8. You were, on April 2, 2014, convicted in the District Court of Oklahoma County, for the offense of False Personation of Law Enforcement Officer, in violation of 21 O.S. 1533, and sentenced to two years imprisonment for that offense.

Date:

12/8/2014

A handwritten signature in black ink, appearing to read 'Roslyn González'.

Roslyn González  
Assistant Chief Counsel

Notice to Respondent

**Warning.** Any statement you make may be used against you in removal proceedings.

**Alien Registration:** This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

**Representation:** If you so choose, you may be represented in this proceeding, at no expense to the government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this Notice.

**Conduct of the hearing:** At the time of your hearing, you should bring with you any affidavits or other documents which you desire to have considered in connection with your case. If any document is in a foreign language, you must bring the original and a certified English translation of the document. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.

At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the charging document and that you are inadmissible or deportable on the charges contained in the charging document. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the (government, to object on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government.

You will be advised by the immigration judge before whom you appear, of any relief from removal for which you may appear eligible including the privilege of departing voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

**Failure to appear:** You are required to provide the INS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the INS.

Certificate of Service

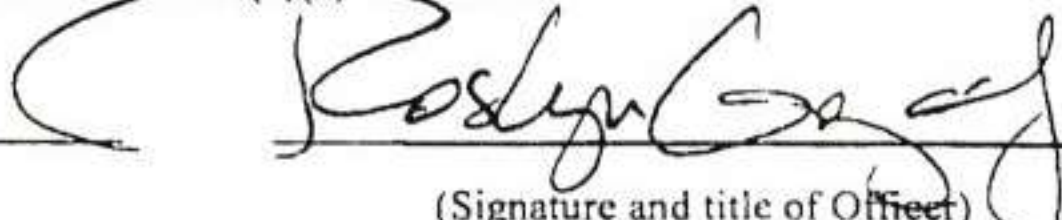
This charging document was served on the respondent by me in the following manner and in compliance with section 239(a)(1)(F) of the Act:

in person  by regular mail  by email on 12/8/14  by fax on \_\_\_\_\_

to: the respondent at the Tulsa County Sheriff's Office

The alien was provided oral notice in the \_\_\_\_\_ language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

\_\_\_\_\_  
(Signature of respondent if personally served)

  
(Signature and title of Officer)

Westlaw.

21 Okl.St. Ann. § 791

Page 1

**C**

Oklahoma Statutes Annotated Currentness

Title 21. Crimes and Punishments

Part III. Crimes Against the Person

Chapter 28. Robbery (Refs & Annos)

→→ § 791. Robbery defined

Robbery is a wrongful taking of personal property in the possession of another, from his person or immediate presence, and against his will, accomplished by means of force or fear.

CREDIT(S)

R.L.1910, § 2364.

Current through Chapter 430 (End) of the Second Session of the 54th Legislature (2014)

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21 Okl.St. Ann. § 792

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**C**

Oklahoma Statutes Annotated Currentness

Title 21. Crimes and Punishments

Part III. Crimes Against the Person

Chapter 28. Robbery (Refs & Annos)

→ → § 792. Force or fear--How employed

To constitute robbery, the force or fear must be employed either to obtain or retain possession of the property, or to prevent or overcome resistance to the taking. If employed merely as a means of escape, it does not constitute robbery.

CREDIT(S)

R.L.1910, § 2365.

Current through Chapter 430 (End) of the Second Session of the 54th Legislature (2014)

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21 Okl.St. Ann. § 799

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**C**

Oklahoma Statutes Annotated Currentness

Title 21. Crimes and Punishments

Part III. Crimes Against the Person

Chapter 28. Robbery (Refs & Annos)

→→ § 799. Robbery in the second degree a felony

Any person guilty of robbery in the second degree shall be guilty of a felony punishable by imprisonment in the State Penitentiary not exceeding ten (10) years.

CREDIT(S)

R.L.1910, § 2372; Laws 1997, c. 133, § 241, eff. July 1, 1999; Laws 1999, 1st Ex.Sess., c. 5, § 145, eff. July 1, 1999.

Current through Chapter 430 (End) of the Second Session of the 54th Legislature (2014)

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21 Okl.St. Ann. § 797

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**C**

Oklahoma Statutes Annotated Currentness

Title 21. Crimes and Punishments

Part III. Crimes Against the Person

Chapter 28. Robbery (Refs & Annos)

→→ § 797. Degrees of robbery

Robbery in the first degree is when, in the course of committing the theft, the defendant:

1. inflicts serious bodily injury upon the person;
2. threatens a person with immediate serious bodily injury;
3. intentionally puts a person in fear of immediate serious bodily injury; or
4. commits or threatens to commit a felony upon the person.

When accomplished in any other manner, it is robbery in the second degree.

CREDIT(S)

R.L.1910, § 2370; Laws 2001, c. 437, § 4, eff. July 1, 2001.

Current through Chapter 430 (End) of the Second Session of the 54th Legislature (2014)

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21 Okl.St. Ann. § 1533

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**C**

Oklahoma Statutes Annotated Currentness

Title 21. Crimes and Punishments

Part VII. Crimes Against Property

Chapter 61. False Pretenses, False Personations, Cheats and Frauds

False Personation (Refs & Annos)

→ → § 1533. Penalties--Definitions--Certain defenses excluded

A. Except as provided in subsection B of this section, every person who falsely personates any public officer, civil or military, any firefighter, any law enforcement officer, any emergency medical technician or other emergency medical care provider, or any private individual having special authority by law to perform any act affecting the rights or interests of another, or who assumes, without authority, any uniform or badge by which such officers or persons are usually distinguished, and in such assumed character does any act whereby another person is injured, defrauded, harassed, vexed or annoyed, upon conviction, is guilty of a misdemeanor punishable by imprisonment in the county jail not exceeding six (6) months, or by a fine not exceeding Two Thousand Dollars (\$2,000.00), or by both such fine and imprisonment.

B. Every person who falsely personates any public officer or any law enforcement officer in connection with or relating to any sham legal process shall, upon conviction, be guilty of a felony, punishable by imprisonment in the custody of the Department of Corrections for not more than two (2) years, or a fine not exceeding Five Thousand Dollars (\$5,000.00), or both such fine and imprisonment.

C. Every person who falsely asserts authority of law not provided for by federal or state law in connection with any sham legal process shall, upon conviction, be guilty of a felony, punishable by imprisonment in the custody of the Department of Corrections for not more than two (2) years, or a fine not exceeding Five Thousand Dollars (\$5,000.00), or both such fine and imprisonment.

D. Every person who, while acting falsely in asserting authority of law, attempts to intimidate or hinder a public official or law enforcement officer in the discharge of official duties by means of threats, harassment, physical abuse, or use of sham legal process shall, upon conviction, be guilty of a felony punishable by imprisonment in the custody of the Department of Corrections for not more than two (2) years, or a fine not exceeding Five Thousand Dollars (\$5,000.00), or both such fine and imprisonment.

E. Any person who, without authority under federal or state law, acts as a supreme court justice, a district court judge, an associate district judge, a special judge, a magistrate, a clerk of the court or deputy, a notary public, a juror or other official holding authority to determine a controversy or adjudicate the rights or interests of others, or signs a document in such capacity, shall, upon conviction, be guilty of a felony punishable by imprisonment in the custody of the Department of Corrections for not more than two (2) years, or a fine not exceeding Five Thousand Dollars (\$5,000.00), or both such fine and imprisonment.

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21 Okl.St. Ann. § 1533

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F. Every person who uses any motor vehicle or motor-driven cycle usually distinguished as a law enforcement vehicle or equips any motor vehicle or motor-driven cycle with any spot lamps, audible sirens, or flashing lights, in violation of Section 12-217, 12-218 or 12-227 of Title 47 of the Oklahoma Statutes, or in any other manner uses any motor vehicle or motor-driven cycle:

1. Which, by markings that conform to or imitate the markings required or authorized in subsection B of Section 151 of Title 47 of the Oklahoma Statutes and used by the Oklahoma Highway Patrol Division of the Department of Public Safety, conveys to any person the impression or appearance that it is a vehicle of the Oklahoma Highway Patrol shall, upon conviction, be guilty of a misdemeanor punishable by imprisonment in the county jail for not more than one (1) year, or by a fine not exceeding Five Hundred Dollars (\$500.00), or both fine and imprisonment; provided, nothing in this paragraph shall be construed to prohibit the use of such a vehicle for exhibitions, club activities, parades, and other functions of public interest and which is not used on the public roads, streets, and highways for regular transportation; or

2. For the purpose of falsely personating a law enforcement officer and who in such assumed character commits any act whereby another person is injured, defrauded, harassed, vexed or annoyed shall, upon conviction, be guilty of a felony punishable by imprisonment in the custody of the Department of Corrections not exceeding ten (10) years, or by a fine not exceeding Ten Thousand Dollars (\$10,000.00), or by both such fine and imprisonment.

G. 1. Any person who displays or causes to be displayed the words "State Police" alone or in conjunction with any other word or words on any motor vehicle, badge, clothing, identification card, or any other object or document with the intent to communicate peace officer or investigating authority shall, upon conviction, be guilty of a misdemeanor punishable by a fine not exceeding One Thousand Dollars (\$1,000.00). This paragraph shall not apply to any officer with statewide investigatory or law enforcement authority.

2. Any person who displays or causes to display such words as provided in this subsection for the purpose of falsely personating a law enforcement officer and as such commits any act whereby another person is injured, defrauded, harassed, vexed or annoyed shall, upon conviction, be guilty of a felony punishable by imprisonment in the custody of the Department of Corrections not exceeding ten (10) years, or by a fine not exceeding Ten Thousand Dollars (\$10,000.00), or by both such fine and imprisonment.

H. As used in this section:

1. "Sham legal process" means the issuance, display, delivery, distribution, reliance on as lawful authority, or other use of an instrument that is not lawfully issued, whether or not the instrument is produced for inspection or actually exists, and purports to do any of the following:

a. to be a summons, subpoena, judgment, arrest warrant, search warrant, or other order of a court recognized by the laws of this state, a law enforcement officer commissioned pursuant to state or federal law or the law of a federally recognized Indian tribe, or a legislative, executive, or administrative agency es-

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established by state or federal law or the law of a federally recognized Indian tribe,

b. to assert jurisdiction or authority over or determine or adjudicate the legal or equitable status, rights, duties, powers, or privileges of any person or property, or

c. to require or authorize the search, seizure, indictment, arrest, trial, or sentencing of any person or property; and

2. "Lawfully issued" means adopted, issued, or rendered in accordance with the applicable statutes, rules, regulations, and ordinances of the United States, a state, or a political subdivision of a state.

I. It shall not be a defense to a prosecution under subsection B, C, D or E of this section that:

1. The recipient of the sham legal process did not accept or believe in the authority falsely asserted in the sham legal process;

2. The person violating subsection B, C, D or E of this section does not believe in the jurisdiction or authority of this state or of the United States government; or

3. The office the person violating subsection B, C, D or E of this section purports to hold does not exist or is not an official office recognized by state or federal law.

#### CREDIT(S)

R.L.1910, § 2691; Laws 1990, c. 320, § 4, emerg. eff. May 30, 1990; Laws 1993, c. 13, § 1, emerg. eff. March 24, 1993; Laws 1997, c. 405, § 1, emerg. eff. June 13, 1997; Laws 1998, 1st Ex.Sess., c. 2, § 8, emerg. eff. June 19, 1998; Laws 1999, c. 24, § 4, eff. July 1, 1999; Laws 1999, 1st Ex.Sess., c. 5, § 261, eff. July 1, 1999; Laws 2003, c. 199, § 2, eff. Nov. 1, 2003; Laws 2003, c. 474, § 2, eff. Nov. 1, 2003; Laws 2012, c. 125, § 1, eff. Nov. 1, 2012.

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21 Okl.St. Ann. § 1451

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**C**

Oklahoma Statutes Annotated Currentness

Title 21. Crimes and Punishments

Part VII. Crimes Against Property

Chapter 59. Embezzlement (Refs & Annos)

→→ § 1451. Embezzlement defined--Penalties

A. Embezzlement is the fraudulent appropriation of property of any person or legal entity, legally obtained, to any use or purpose not intended or authorized by its owner, or the secretion of the property with the fraudulent intent to appropriate it to such use or purpose, under any of the following circumstances:

1. Where the property was obtained by being entrusted to that person for a specific purpose, use, or disposition and shall include, but not be limited to, any funds "held in trust" for any purpose;
2. Where the property was obtained by virtue of a power of attorney being granted for the sale or transfer of the property;
3. Where the property is possessed or controlled for the use of another person;
4. Where the property is to be used for a public or benevolent purpose;
5. Where any person diverts any money appropriated by law from the purpose and object of the appropriation;
6. Where any person fails or refuses to pay over to the state, or appropriate authority, any tax or other monies collected in accordance with state law, and who appropriates the tax or monies to the use of that person, or to the use of any other person not entitled to the tax or monies;
7. Where the property is possessed for the purpose of transportation, without regard to whether packages containing the property have been broken;
8. Where any person removes crops from any leased or rented premises with the intent to deprive the owner or landlord interested in the land of any of the rent due from that land, or who fraudulently appropriates the rent to that person or any other person; or
9. Where the property is possessed or controlled by virtue of a lease or rental agreement, and the property is willfully or intentionally not returned within ten (10) days after the expiration of the agreement.

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Embezzlement does not require a distinct act of taking, but only a fraudulent appropriation, conversion or use of property.

B. Except as provided in subsection C of this section, embezzlement shall be punished as follows:

1. If the value of the property embezzled is less than Five Hundred Dollars (\$500.00), any person convicted shall be punished by a fine not exceeding One Thousand Dollars (\$1,000.00), or by imprisonment in the county jail for a term not more than one (1) year, or by both such fine and imprisonment;

2. If the value of the property embezzled is Five Hundred Dollars (\$500.00), or more but less than One Thousand Dollars (\$1,000.00), any person convicted shall be guilty of a felony and shall be punished by imprisonment in the county jail for not more than one (1) year or by imprisonment in the county jail for one or more nights or weekends pursuant to Section 991a-2 of Title 22 of the Oklahoma Statutes, at the discretion of the court, and shall be subject to a fine not exceeding Five Thousand Dollars (\$5,000.00), and ordered to pay restitution to the victim as provided in Section 991f of Title 22 of the Oklahoma Statutes;

3. If the value of the property embezzled is One Thousand Dollars (\$1,000.00) or more but less than Twenty-five Thousand Dollars (\$25,000.00), any person convicted shall be guilty of a felony and shall be punished by imprisonment in the custody of the Department of Corrections for a term of not more than five (5) years, and a fine of not exceeding Five Thousand Dollars (\$5,000.00), and ordered to pay restitution to the victim as provided in Section 991f of Title 22 of the Oklahoma Statutes; or

4. If the value of the property embezzled is Twenty-five Thousand Dollars (\$25,000.00) or more, any person convicted shall be guilty of a felony and shall be punished by imprisonment in the custody of the Department of Corrections for a term of not more than ten (10) years, and a fine not exceeding Ten Thousand Dollars (\$10,000.00), and ordered to pay restitution to the victim as provided in Section 991f of Title 22 of the Oklahoma Statutes.

For purposes of this subsection, a series of offenses may be aggregated into one offense when they are the result of the formulation of a plan or scheme or the setting up of a mechanism which, when put into operation, results in the taking or diversion of money or property on a recurring basis. When all acts result from a continuing course of conduct, they may be aggregated into one crime. Acts forming an integral part of the first taking which facilitate subsequent takings, or acts taken in preparation of several takings which facilitate subsequent takings, are relevant to determine the party's intent to commit a continuing crime.

C. Any county or state officer, deputy or employee of such officer, who shall divert any money appropriated by law from the purpose and object of the appropriation, shall, upon conviction, be guilty of a felony punishable by imprisonment in the custody of the Department of Corrections for a term not less than one (1) year nor more than ten (10) years, and a fine equal to triple the amount of money so embezzled and ordered to pay restitution to the victim as provided in Section 991f of Title 22 of the Oklahoma Statutes. The fine shall operate as a judgment lien at law on all estate of the party so convicted and sentenced, and shall be enforced by execution or oth-

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er process for the use of the person whose money or other funds or property were embezzled. In all cases the fine, so operating as a judgment lien, shall be released or entered as satisfied only by the person in interest.

D. Any executor, administrator, trustee, beneficiary or other person benefiting from, acting in a fiduciary capacity for, or otherwise administering a probate, intestate, or trust estate, whether the trust is inter vivos or testamentary, upon conviction of embezzlement from the estate shall not receive any portion, share, gift or otherwise benefit from the estate.

CREDIT(S)

R.L.1910, § 2670; Laws 2002, c. 460, § 12, eff. Nov. 1, 2002; Laws 2004, c. 275, § 7, eff. July 1, 2004; Laws 2011, c. 280, § 1, eff. Nov. 1, 2011; Laws 2012, c. 235, § 1, eff. July 1, 2012.

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21 Okl.St. Ann. § 1541.2

Page 1

**C**

Oklahoma Statutes Annotated Currentness

Title 21. Crimes and Punishments

Part VII. Crimes Against Property

Chapter 61. False Pretenses, False Personations, Cheats and Frauds

False Pretenses; Trick or Deception

→→ § 1541.2. Value of Five Hundred Dollars but less than One Thousand Dollars--Value of One Thousand Dollars or more

If the value of the money, property or valuable thing referred to in Section 1541.1 of this title is Five Hundred Dollars (\$500.00) or more but less than One Thousand Dollars (\$1,000.00), any person convicted pursuant to this section shall be guilty of a felony and shall be punished by incarceration in the county jail for not to exceed one (1) year or incarceration in the county jail one or more nights or weekends pursuant to Section 991a-2 of Title 22 of the Oklahoma Statutes, at the option of the court, and shall be subject to a fine of not more than Five Thousand Dollars (\$5,000.00) and ordered to provide restitution to the victim as provided in Section 991a of Title 22 of the Oklahoma Statutes, and if the value is One Thousand Dollars (\$1,000.00) or more, any person convicted hereunder shall be deemed guilty of a felony and shall be punished by imprisonment in the State Penitentiary for a term not more than ten (10) years, or by a fine not to exceed Five Thousand Dollars (\$5,000.00), or by both such fine and imprisonment.

CREDIT(S)

Laws 1967, c. 94, § 2, emerg. eff. April 20, 1967; Laws 1982, c. 277, § 2, operative Oct. 1, 1982; Laws 1993, c. 147, § 4, eff. Sept. 1, 1993; Laws 1997, c. 133, § 369, eff. July 1, 1999; Laws 1999, 1st Ex.Sess., c. 5, § 262, eff. July 1, 1999; Laws 2001, c. 437, § 7, eff. July 1, 2001.

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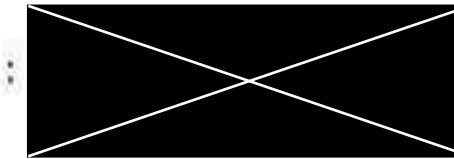
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# **ATTACHMENT 5**

UNITED STATES IMMIGRATION COURT  
1100 COMMERCE ST., SUITE 1060  
DALLAS, TX 75242

IN THE REMOVAL CASE OF  
YAGHOUBI, REZA YEGANEH  
RESPONDENT

CASE NO.:



ORDERS

- This is a memorandum of the Court's Decision and Orders entered on Dec 9, 2014. This memorandum is solely for the convenience of the parties. The oral or written Findings, Decision and Orders is the official opinion in this case.  Both parties waived issuance of a formal oral decision in the case.
- The respondent was ordered REMOVED from the United States to Iran ( ) in absentia.
- Respondent's application for VOLUNTARY DEPARTURE was DENIED and respondent was ordered removed to \_\_\_\_\_, in the alternative to \_\_\_\_\_.
- Respondent's application for VOLUNTARY DEPARTURE was GRANTED until \_\_\_\_\_, upon posting a voluntary departure bond in the amount of \$ \_\_\_\_\_ to DHS within five business days from the date of this Order, with an alternate Order of removal to \_\_\_\_\_ or \_\_\_\_\_. Respondent shall present to DHS within ( ) thirty days ( ) sixty days from the date of this Order, all necessary travel documents for voluntary departure.
- Respondent's application for ASYLUM was ( ) granted ( ) denied ( ) withdrawn with prejudice.  
( ) subject to the ANNUAL CAP under the INA section 207(a)(5).  
( ) Respondent knowingly filed a FRIVOLOUS asylum application.
- Respondent's application for WITHHOLDING of removal under INA section 241(b)(3) was ( ) granted ( ) denied ( ) withdrawn with prejudice.
- Respondent's application for WITHHOLDING of removal under the Torture Convention was ( ) granted ( ) denied ( ) withdrawn with prejudice.
- Respondent's application for DEFERRAL of removal under the Torture Convention was ( ) granted ( ) denied ( ) withdrawn with prejudice.
- Respondent's application for CANCELLATION of removal under section ( ) 203(b) of NACARA, ( ) 240A(a) ( ) 240A(b)(1) ( ) 240A(b)(2) of the INA, was ( ) granted ( ) denied ( ) withdrawn with prejudice. If granted, it was ordered that the DHS issue all appropriate documents necessary to give effect to this Order. Respondent ( ) is ( ) is not subject to the ANNUAL CAP under INA section 240A(e).
- Respondent's application for a WAIVER under the INA section \_\_\_\_\_ was ( ) granted ( ) denied ( ) withdrawn or ( ) other \_\_\_\_\_. ( ) The conditions imposed by INA section 216 on the respondent's permanent resident status were removed.
- Respondent's application for ADJUSTMENT of status under section \_\_\_\_\_ of the ( ) INA ( ) NACARA ( ) \_\_\_\_\_ was ( ) granted ( ) denied ( ) withdrawn with prejudice. If granted, it was ordered that DHS issue all appropriate documents necessary to give effect to this Order.

CASE NUMBER: XXXXXXXXXX RESPONDENT: YAGHOUBI, REZA YEGANEH

- Respondent's status was RESCINDED pursuant to the INA section 246.
- Respondent's motion to WITHDRAW his application for admission was  granted  denied. If the respondent fails to abide by any of the conditions directed by the district director of DHS, then the alternate Order of removal shall become immediately effective without further notice or proceedings: the respondent shall be removed from the United States to \_\_\_\_\_.
- Respondent was ADMITTED as a \_\_\_\_\_ until \_\_\_\_\_ . As a condition of admission, the respondent was ordered to post a \$ \_\_\_\_\_ bond.
- Case was  TERMINATED  with  without prejudice  ADMINISTRATIVELY CLOSED.
- Respondent was orally advised of the LIMITATION on discretionary relief and consequences for failure to depart as ordered.
  - If you fail to voluntarily depart when and as required, you shall be subject to civil money penalty of at least \$1,000, but not more than \$5,000, and be ineligible for a period of 10 years for any further relief under INA sections 240A, 240B, 245, and 248 (INA Section 240B(d)).
  - If you are under a final order of removal, and if you willfully fail or refuse to 1) depart when and as required, 2) make timely application in good faith for any documents necessary for departure, or 3) present yourself for removal at the time and place required, or, if you conspire to or take any action designed to prevent or hamper your departure, you shall be subject to civil money penalty of up to \$500 for each day under such violation. (INA section 274D(a)). If you are removable pursuant to INA 237(a), then you shall further be fined and/or imprisoned for up to 10 years. (INA section 243(a)(1)).
- Other: \_\_\_\_\_

Date: Dec 9, 2014

  
R. WAYNE KIMBALL, Judge

APPEAL:  waived  reserved by  Respondent  DHS  Both

DUE BY:

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY:  MAIL  PERSONAL SERVICE

TO:  DHS  ALIEN  Alien's ATT/REP  ALIEN c/o Custodial Officer

DATE: 12-9-14 BY:  COURT STAFF  JUDGE KUM

Y2

# **ATTACHMENT 6**



UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
AURORA IMMIGRATION COURT

Respondent Name:

YAGHOUBI, REZA YEGANEH

To:

YAGHOUBI, REZA YEGANEH  
300 N. DENVER AVE  
TULSA, OK 74103

A-Number:



Riders:

In Removal Proceedings

Initiated by the Department of Homeland Security

Date:

03/21/2025

**ORDER OF THE IMMIGRATION JUDGE**

Respondent has applied for a stay of removal in connection with a Motion to Reopen or Motion to Reconsider.

Upon consideration of the representations and submissions made by and on behalf of Respondent and the Department of Homeland Security, it is hereby ordered that the application for a stay of removal:

- be granted, to be effective until determination of the motion.  
Good cause demonstrated. Effective until the Motion to Reopen has been adjudicated.
  
- be denied.

ELM

Immigration Judge: MCGRAIL, ELIZABETH 03/21/2025

Appeal: Department of Homeland Security:  waived  reserved  
Respondent:  waived  reserved

Appeal Due:

**Certificate of Service**

This document was served:

Via:  M Mail  P Personal Service  E Electronic Service  U Address Unavailable

To:  Noncitizen  Noncitizen c/o custodial officer  M Noncitizen's atty/rep.  P DHS

Respondent Name : YAGHOUBI, REZA YEGANEH | A-Number : 

Riders:

Date: 03/21/2025 By: JONES, ROCHELLE, Court Staff

# **ATTACHMENT 7**



UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
AURORA IMMIGRATION COURT

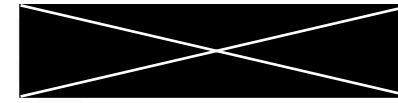
Respondent Name:

YAGHOUBI, REZA YEGANEH

To:

YAGHOUBI, REZA YEGANEH  
300 N. DENVER AVE  
TULSA, OK 74103

A-Number:



Riders:

In Removal Proceedings

Initiated by the Department of Homeland Security

Date:

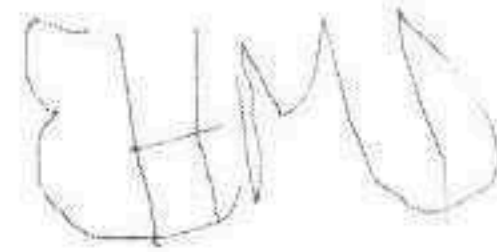
04/24/2025

ORDER OF THE IMMIGRATION JUDGE

Respondent  the Department of Homeland Security has filed a motion to reopen these proceedings. Upon reading and considering the motion, and any opposition from the non-moving party, the motion is  granted  denied for the following reason(s):

- The motion is untimely and fails to meet any exceptions. *See* 8 C.F.R. § 1003.23(b)(1),(4).
- The motion is numerically barred and fails to meet any exceptions. *See* 8 C.F.R. § 1003.23(b)(1),(4).
- The moving party failed to provide evidence demonstrating changed circumstances that is material and that was unavailable or could not have been discovered or presented at the previous proceedings. *See* 8 C.F.R. § 1003.23(b)(4)(i).
- The moving party failed to submit the appropriate application for relief and any accompanying documents. *See* 8 C.F.R. § 1003.23(b)(3).
- The Respondent has been removed or otherwise departed from the United States. *See* 8 C.F.R. § 1003.23(b)(1).
- Other:

Respondent's premise to reopen is based on a Supreme Court decision, *Sessions v. Dimaya*, 584 U.S 148 (2018), which may or may not have impacted Respondent's eligibility for relief. Even accepting Respondent's argument in the most favorable light, he has not demonstrated due diligence in seeking to reopen his case by filing more than six years after the Supreme Court handed down the decision. Also, Respondent ignores the fact that although his conviction for robbery may no longer be an aggravated felony under INA §101(a)(43)(F), it remains an aggravated felony under INA §101(a)(43)(G). Accordingly, he would still be disqualified for the relief he seeks.



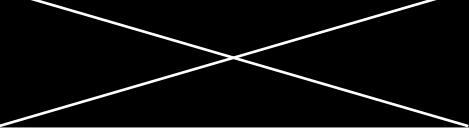
Immigration Judge: MCGRAIL, ELIZABETH 04/24/2025

### Certificate of Service

This document was served:

Via:  Mail |  Personal Service |  Electronic Service |  Address Unavailable

To:  Noncitizen |  Noncitizen c/o custodial officer |  Noncitizen's atty/rep. |  DHS

Respondent Name : YAGHOUBI, REZA YEGANEH | A-Number : 

Riders:

Date: 04/24/2025 By: JONES, ROCHELLE, Court Staff

# **ATTACHMENT 8**

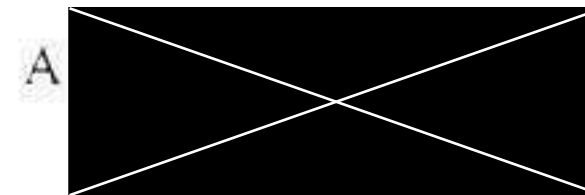
*Enforcement and Removal Operations*

U.S. Department of Homeland Security  
Dallas Field Office  
8101 North Stemmons Freeway  
Dallas, TX 75247



**U.S. Immigration  
and Customs  
Enforcement**

YEGANEH, Reza Yaghoubi  
c/o Immigration and Customs Enforcement  
Dallas Field Office



### **Decision to Continue Detention**

This letter is to inform you that your custody status has been reviewed, and it has been determined that you will not be released from the custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has been made based on a review of your file, consideration of any information you submitted to ICE's reviewing officials, and upon review of the factors for consideration set forth at 8 C.F.R. § 241.4(e), (f), and (g).

As explained below ICE has determined to maintain your custody because:

- You have been deemed a threat to public safety.
- Your removal is expected to be effected within the reasonable foreseeable future.

ICE has made such determination based upon the following:

Your extensive criminal history, ongoing efforts to effect your removal, and a pending Travel Document request with the Iranian Embassy.

Based on the above, you are to remain in ICE custody pending your removal from the United States, as ICE is unable to conclude that the factors set forth at 8 C.F.R. § 241.4(e) have been satisfied. You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 U.S.C. § 1253(a).

If you have not been released or removed from the United States at the expiration of the three-month period after this 90-day review, jurisdiction of the custody decision in your case will be transferred to the ICE Headquarters (ERO Removal Division), Potomac Center North, 500 12<sup>th</sup> Street SW, Washington, DC 20536. The ERO Removal Division will thereafter conduct a custody review and will make a determination regarding whether you will continue to be detained pending removal or may be released.

To assist in the ERO Removal Division custody review, you will be afforded a personal interview. You (and your representative who has filed a *Form G-28, Notice of Entry of Appearance*, if any) will be notified of the date and time of the interview approximately 30 days prior to the scheduled interview date. This interview may

be in person or through a video teleconference. If ERO needs to change the date of the interview, ERO will provide notice to you and your representative, if any.

You may be accompanied during the interview by a person of your choice, subject to security requirements at the detention facility, as long as this person is able to attend the interview at the scheduled time.

You may submit any additional documentation, in English, that you wish to be considered in support of your release at the time of the interview or via mail service up to five business days prior to the scheduled time of your interview to the following address:

ATTN: ICE/ERO  
1209 Sunflower Lane  
Alvarado, TX 76009

Such documentation should contain a cover letter indicating that the material is submitted in support of your Post Order Custody Review personal interview. An attorney or other person may submit materials on your behalf.

You are required to complete the below information:

I do  /do not  want a personal interview.

If you want a personal interview, please check the appropriate box(es) below:

I need an interpreter for your interview.

Language/Dialect: \_\_\_\_\_

I will be assisted at this interview by a representative of my own choosing.

Name: \_\_\_\_\_

If your representative has not filed a *G-28, Notice of Entry of Appearance* on your behalf, you are responsible for notifying any other person you have selected to assist you of the date, time, and location of the interview. The representative must be at least 18 years of age.

You will be sent a separate *Notice to Alien of Interview for Review of Custody Status* approximately 30 days before the interview is scheduled. If you wish to request additional time to prepare for the interview, you must notify your ICE Deportation Officer within five business days of receipt of the notice of your interview. If ERO agrees to postpone the interview at your request, you will be deemed to have waived its completion prior to jurisdiction over your case transferring to the ERO Removal Division.

You will be notified of the decision in your case when the custody review has been concluded by the ERO Removal Division.

TERRY A  
DAVIS

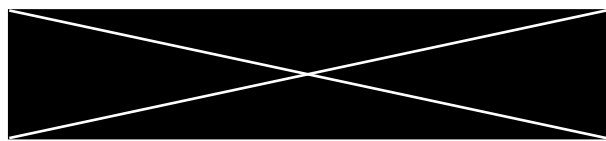
Digitally signed by  
TERRY A DAVIS  
Date: 2025.06.18  
09:00:42 -05'00'

Terry A. Davis

(a) Deputy Field Office Director

\_\_\_\_\_  
Date

Decision to Continue Detention  
YEGANEH, Reza Yaghoubi



Page 2

**PROOF OF SERVICE**

(1) Personal Service (Officer to complete both (a) and (b) below.)

(a) I E. GARZA, Deportation Officer  
Name of ICE Officer Title

certify that I served YEGANEH, Reza Yaghoubi with a copy of  
Name of detainee

this document at Bluebonnet Detention Center on 06/19/2025 at 1015  
Institution Date Time

(b) I certify that I served the custodian E GARZA  
Name of Official  
Deportation Officer at Bluebonnet Detention Center on  
Title Institution  
06/19/2025 with a copy of this document.  
Date

OR

(2) Service by certified mail, return receipt. (Attach copy of receipt)

I \_\_\_\_\_, \_\_\_\_\_, certify  
Name of ICE Officer Title  
that I served \_\_\_\_\_ and the custodian \_\_\_\_\_  
Name of detainee Name of Official  
with a copy of this document by certified mail at \_\_\_\_\_ on \_\_\_\_\_  
Institution Date

Detainee Signature: Refused to sign Date: 06/19/2025

( ) cc: Attorney of Record or Designated Representative  
(X) cc: A-File