

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 SUR-REPLY

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 Exhibits A and B in support of Respondent's Sur-Reply.

| <u>Tab</u> | <u>Exhibit</u> | <u>Page(s)</u> |
|------------|--|----------------|
| A. | Declaration of Quincy R. Hodges, III. | APP. 001-004 |
| B. | Declaration of Ryan J. Lankford | APP. 005-007 |

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 September 5, 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
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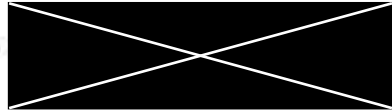
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Case No. 1:25-CV-121-H

DECLARATION OF OFFICER QUINCY R. HODGES, III

In accordance with the provisions of Section 1746 of Title 28, United States Code, I, the undersigned, Quincy R. Hodges, III, Deportation and Detention Officer (“DDO”), do hereby make the following declaration, under penalty of perjury in the above-styled and numbered cause:

1. I, Quincy R. Hodges, III, am presently employed by the United States Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”), Enforcement and Removal Operations (“ERO”).
2. I have been employed by ICE since 2007. I have been a DDO with the Removal Management Division since September 2022. As a DDO, I coordinate ICE activities with foreign delegations. I also serve as the subject matter expert for the immigration country portfolios, and I procure travel documents from consulates and embassies on behalf of the ERO field offices.
3. The following information is based on my personal knowledge and my review of information obtained from other individuals employed by DHS, information obtained

from government databases maintained by DHS, and other documents related to the case of Reza Yaghoubi Yeganeh ("Yaghoubi Yeganeh"), alien file number 

4. I have begun meeting once a week with officials for the Embassy for the Republic of Iran to review travel documents and increase the cooperation between the Iran and the United States.
5. At the meetings with Embassy officials, we review travel requests, set up times for Embassy officials to interview Iranian citizens, and discuss cases where their citizens want to return to Iran. I have discussed Yaghoubi Yeganeh's case with Embassy officials, and I have reviewed DHS documents showing that an interview between Embassy officials and Yaghoubi Yeganeh was completed. I have not met with Embassy officials to discuss Yaghoubi Yeganeh's individual case since the completion of his August 25, 2025, interview. Embassy officials have only discussed individual cases when they need further evidence.
6. Embassy Officials have started accepting copies of birth certificates or passports to establish Iranian citizenship, and they have issued travel documents based on copies when previously they required original documents. For Yaghoubi Yeganeh's case, DHS submitted a copy of his Iranian birth certificate.
7. If Iran denies the issuance of travel documents, their standard protocol is to immediately send a denial letter to the ICE field office. I understand from Dallas Field Officer Ryan Lankford that he has not received a denial letter for Yaghoubi Yeganeh.
8. I contacted the Director at the Iranian Embassy to investigate whether Yaghoubi Yeganeh was told at his August 25, 2025, interview that Iran had denied issuance of the travel documents. The Director told me he did not conduct the interview, but that the Iranian

Consulate had conducted interview. The Director stated he would check with the Consulate, but as of the date of this declaration I have not yet received an update from the Director.

9. Within the last month there have been negotiations for the Republic of Iran to accept a charter flight to facilitate the removal of a large number of Iranian citizens.
10. Since January 1, 2025, ICE has removed approximately seventy-five (75) Iranian citizens to Iran.

Sworn to and subscribed this 5th day of September, 2025.

**QUINCY R
HODGES III**

Digitally signed by QUINCY
R HODGES III
Date: 2025.09.05 11:31:50
-04'00'

Quincy R. Hodges, III
Deportation and Detention Officer
Department of Homeland Security
Immigration and Customs Enforcement

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
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Case No. 1:25-CV-121-H

DECLARATION OF RYAN J. 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, Immigration and Customs Enforcement (“DHS”), in the position of Deportation Officer for Enforcement Removal Operations (“ERO”).
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 XXXXXXXXXX a native and citizen of Iran. My

involvement with YAGHOUBI YEGANEH's case has included monitoring his detention history, seeking to obtain travel documents, and reviewing custody determinations made in his case.

4. I believe YAGHOUBI YEGANEH spoke with Iranian Embassy officials on or about August 25, 2025. I provided the phone number for the Iranian Embassy to officers at the Bluebonnet Detention Center, and those officers confirmed the call was completed.
5. I have not received any communication from Iranian officials that they have denied, or will deny, ERO's request for travel documents in this case. I also checked the return tracking number for the travel documents request, and it showed the Iranian Embassy has not mailed anything to me. I am not aware of any denial of travel documents in this case.
6. If the request for travel documents is denied by the Iranian officials, ERO will likely explore the possibility of third-country removal.

Sworn to and subscribed this 4th day of September, 2025.

**RYAN J
LANKFORD**

Digitally signed by RYAN
J LANKFORD
Date: 2025.09.04
15:30:06 -05'00'

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