

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

Mohamed Ali Abubaker NASER

Petitioner,

v.

TERRANCE DICKERSON, *in his official capacity
as Warden of Stewart Detention Center, and*
TODD LYONS, *in his official capacity as Acting
Director of Immigration and Customs Enforcement*
and GEORGE STERLING, *Field Office Director*
ICE Atlanta Field Office, and KRISTI NOEM
Secretary of Homeland Security,

Respondents.

Case No. 4:25-cv-248

**PETITION FOR WRIT
OF HABEAS CORPUS
A# 240 987 691**

I. INTRODUCTION

1. Petitioner Mohamed Ali Aboubaker Naser (“Mr. Naser”) is a 50-year-old Libyan national who has resided in Greensboro, North Carolina, for roughly fifteen years. He is married and supports five children, three of whom are U.S. citizens.
2. On July 29, 2025, an Immigration Judge (“IJ”) ordered Mr. Naser released on a \$20,000 bond, finding he poses neither danger to the community nor flight risk. No additional conditions were imposed.

3. The bond was posted on July 30, 2025, yet Immigration and Customs Enforcement (“ICE”) refused to accept the bond and release him, asserting it intended to appeal and that release would be automatically stayed under 8 C.F.R. § 1003.19(i)(2).
4. As of the time of filing, ICE has filed neither a Notice of Appeal nor the certification required to trigger § 1003.19(i)(2). Mr. Naser remains confined at Stewart Detention Center in Lumpkin, Georgia.
5. The automatic-stay regulation exceeds any authority Congress conferred in the Immigration and Nationality Act (“INA”) and violates the Fifth Amendment’s Due Process Clause. Even if ICE were to file an appeal now, detention under § 1003.19(i)(2) would remain unlawful.
6. Mr. Naser therefore seeks a writ of habeas corpus directing his immediate release.

II. VENUE AND JURISDICTION

7. This Court has jurisdiction under 28 U.S.C. § 2241, 28 U.S.C. § 1331, and Article I, § 9, cl. 2 of the Constitution (Suspension Clause).
8. Venue lies in this Division because Mr. Naser is detained in Stewart Detention Center, within the Columbus Division, and Respondent Dickerson is his immediate custodian. See 28 U.S.C. §§ 2241(d), 1391(e).

III. PARTIES

9. Petitioner Mohamed Ali Aboubaker Naser (hereinafter “Mr. Naser”) is a 50-

year-old Libyan national who resides in Greensboro, North Carolina. He is currently detained at the Stewart Detention Center in Lumpkin, Georgia.

10. Respondent Terrance Dickerson is the Warden of Stewart Detention Center. As such, Respondent is responsible for the operation of the Detention Center where Mr. Naser is detained. Because ICE contracts with private prisons such as Stewart to house immigration detainees such as Mr. Naser, Respondent Dickerson has immediate physical custody of the Petitioner.

11. Respondent Todd Lyons is the Acting Director of Immigration and Customs Enforcement (hereinafter "ICE"). As such, Respondent Lyons is responsible for the oversight of ICE operations. Respondent Lyons is being sued in his official capacity.

12. Respondent George Sterling is the Atlanta Field Office Director for Immigration and Customs Enforcement (hereinafter "FOD"). As such, Respondent Sterling is responsible for the oversight of ICE operations at the Stewart Detention Center. Respondent Sterling is being sued in his official capacity.

13. Respondent Kristi Noem is the Secretary of the Department of Homeland Security (hereinafter "DHS"). As Secretary of DHS, Secretary Noem is responsible for the general administration and enforcement of the immigration laws of the United States. Respondent Secretary Noem is being sued in her official capacity.

IV. EXHAUSTION OF REMEDIES

14. No statutory exhaustion requirement applies. Moreover, ICE's refusal to honor the IJ's bond order leaves no administrative avenue to secure release; additional

agency steps would be futile.

15. Mr. Naser has exhausted his administrative remedies to the extent required by law, and his only remedy is by way of this judicial action

V. STATEMENT OF FACTS

16. Petitioner Mohamed Ali Aboubaker Naser entered the United States lawfully as a nonimmigrant, and during a time of authorized stay in the United States, timely-filed an asylum application that remains pending. **(Exhibit A, I-20s).**

17. Mr. Naser's presence in the United States has been entirely lawful. **(Exhibit B, Asylum Receipt Notice).**

18. On Tuesday, July 15, 2025, at approximately 9:00 a.m., three unidentified men in plain clothes and unmarked cars came to Mr. Naser's home demanding to see him. Mr. Naser was not at home. They threatened to return "with reinforcements."

19. Approximately two hours later, the same men returned wearing camouflage and vests marked "POLICE," but they produced no badges, warrants, or other credentials, despite repeated requests from the family. One family member attempted to show proof of lawful status at the front window of the house but was dismissed with a wave of the hand. When Mr. Naser arrived home for lunch, they chased him into the residence, attempting to grab his person, and tried for more than ninety minutes to force entry by means of a foot in the door **(Exhibit C, photograph of scuff marks created by boot)**, at one point threatening his son with pepper spray.

20. On Thursday, July 17, 2025, ICE agents arrested Mr. Naser on his way between jobs. During custodial questioning they conceded that their interest in him related to “questions about Iran,” even though Mr. Naser is Libyan and has no Iranian ties. Agents told counsel he would not be released because of a “zero-release policy”. **(Exhibit D, Record of Deportable/Excludable Alien)**

21. Within a day of the arrest, ICE transferred Mr. Naser hundreds of miles away to the Stewart Detention Center, a private, for-profit prison in Lumpkin, Georgia, where he has remained ever since. **(Exhibit E, Message from Family)**

22. On July 29, 2025, an Immigration Judge (hereinafter “IJ”) sitting by Webex at the Stewart Immigration Court granted Mr. Naser release on a \$20,000 bond, concluding that he posed neither a danger to the community nor a flight risk. **(Exhibit F, IJ Bond Order).**

23. Mr. Naser’s family immediately arranged to post the bond **(Exhibit G, Screen captures of the ICE online bond payment system)**, but on July 30, 2025, ICE filed form EOIR-43 with the Stewart Immigration Court, purporting to invoke 8 C.F.R. § 1003.19(i)(2), triggering an automatic stay of the IJ’s bond order. **(Exhibit H, EOIR-43).**

24. ICE advises that the automatic stay may keep Mr. Naser in custody for up to 90 days while the Board of Immigration Appeals (hereinafter “BIA”) considers the appeal, despite the IJ’s factual and legal findings that he merits release. No such appeal has yet been filed. **(Exhibit I, Online case status showing no Notice of Appeal filed).**

25. As of August 1, 2025, Mr. Naser has been detained for 15 days since his arrest and remains confined at Stewart solely because ICE's unilateral invocation of the automatic-stay regulation overrides the IJ's bond determination.

26. Mr. Naser's continued detention imposes severe hardship on his wife and five children, deprives the family of its sole source of income, and forces them to bear significant costs to maintain contact with him.

VI. LEGAL FRAMEWORK FOR RELIEF SOUGHT

27. Habeas corpus relief extends to a person "in custody under or by color of the authority of the United States" if the person can show she is "in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241 (c)(1), (c)(3); see also *Antonelli v. Warden, U.S.P. Atlanta*, 542 F.3d 1348, 1352 (11th Cir. 2008) (holding a petitioner's claims are proper under 28 U.S.C. section 2241 if they concern the continuation or execution of confinement).

28. "[H]abeas corpus is, at its core, an equitable remedy," *Schlup v. Delo*, 513 U.S. 298, 319 (1995), that "[t]he court shall ... dispose of [] as law and justice require," 28 U.S.C. § 2243. "[T]he court's role was most extensive in cases of pretrial and noncriminal detention." *Boumediene v. Bush*, 553 U.S. 723, 779–80 (2008) (citations omitted). "[W]hen the judicial power to issue habeas corpus properly is invoked the judicial officer must have adequate authority to make a determination in light of the relevant law and facts and to formulate and issue appropriate orders for relief, including, if necessary, an order directing the prisoner's release." *Id.* at 787.

VII. CAUSES OF ACTION

COUNT ONE THE REGULATION IS *ULTRA VIRES*

29. Petitioner incorporates paragraphs 1 through 28 as if fully set out herein.

30. The Immigration and Nationality Act, 8 U.S.C. § 1226(a), authorizes discretionary detention subject to an Immigration Judge's bond decision; it does not authorize Immigration and Customs Enforcement to nullify that judicial decision by administrative fiat.

31. Regulation 8 C.F.R. § 1003.19(i)(2) purports to impose an automatic stay that takes effect the moment ICE files—or merely intends to file—a notice of appeal, without any neutral review or individualized findings.

32. By turning discretionary custody into de facto mandatory detention for detainees not subject to 8 U.S.C. § 1226(c), § 1003.19(i)(2) exceeds the statutory power Congress delegated and violates the separation-of-powers principle.

33. Detention premised solely on this ultra vires regulation is “not in accordance with law,” “in excess of statutory jurisdiction,” and “arbitrary [and] capricious” under 5 U.S.C. § 706(2), entitling Petitioner to immediate release.

COUNT TWO (PROCEDURAL DUE PROCESS)

34. Petitioner incorporates paragraphs 1 through 28 as if fully set out herein.

35. The Fifth Amendment forbids a deprivation of liberty without notice and a meaningful opportunity to be heard before a neutral decision-maker.

36. Subsection 1003.19(i)(2) strips Petitioner of that protection by allowing the prosecuting agency—after losing at the bond hearing—to veto the Immigration Judge’s order with a one-page notice that requires no showing of danger, flight risk, or likelihood of success on appeal.

37. Applying the *Mathews v. Eldridge*, 424 U.S. 319 (1976), test, Petitioner’s liberty interest is paramount; the risk of erroneous deprivation is extreme considering the Immigration Judge’s determination that Petitioner is not subject to mandatory detention under 8 U.S.C. § 1226(c), is not a flight risk, and does not pose a danger to the community. Likewise, the risk of erroneous deprivation of liberty is great due to the lack of a non-independent adjudicator. *Marcello v. Bonds*, 39 U.S. 302, 305-306 (1955). In filing the Form EOIR-43, ICE is acting as both the prosecutor as well as the adjudicator. Lastly, the interest of the government in being able to invoke the challenged regulation is minimal, as there is a substitute administrative provision available. Under 8 C.F.R. §1003.19(i)(1), DHS may request an emergency stay from the BIA on the merits of the Immigration Judge’s decision to release Petitioner on bond.

COUNT THREE (SUBSTANTIVE DUE PROCESS)

38. Petitioner incorporates paragraphs 1 through 28 as if fully set out herein.

39. All persons residing in the United States are protected by the Due Process Clause of the Fifth Amendment.

40. The Due Process Clause of the Fifth Amendment provides that “[n]o person

shall be ... deprived of life, liberty, or property, without due process of law.” U.S. CONT. amend. V. Freedom from bodily restraint is at the core of the liberty protected by the Due Process Clause. This vital liberty interest is at stake when an individual is subject to detention by the federal government.

41. Under the civil-detention framework set out in *Zadvydas v. Davis*, 533 U.S. 678 (2001), and its progeny, the Government may deprive a non-citizen of physical liberty only when the confinement serves a legitimate purpose—such as ensuring appearance or protecting the community—and is reasonably related to, and not excessive in relation to, that purpose.

42. Once the Immigration Judge found Petitioner neither dangerous nor a flight risk and set a bond that his friends immediately posted, the Government’s lawful objectives were satisfied; continued confinement therefore bears no reasonable, non-punitive relationship to any legitimate aim and is unconstitutionally arbitrary under *Zadvydas*.

43. The regulation is also excessive because an alternative provision enables ICE to seek an emergency stay of the immigration judge’s release order on the merits. The “emergency stay” provision at 8 C.F.R. § 1003.19(i)(1) permits ICE to file an emergency request for a stay of release with the BIA, just as in any other proceeding in which the losing party seeks appellate review of an adverse decision and a stay pending appeal.

44. The continued detention of Petitioner pursuant to the “automatic stay” regulation violates his due process rights. *See Mohammed H. v. Trump*, No. 25-

1576 (JWB/DTS), 2025 U.S. Dist. LEXIS 117197, at *15 (D. Minn. June 17, 2025); *Günaydin v. Trump*, No. 25-CV-01151 (JMB/DLM), 2025 U.S. Dist. LEXIS 99237 (D. Minn. May 21, 2025). But for intervention by this Court, Petitioner has no means of release pending ICE's appeal.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

- 1) Assume jurisdiction over this matter;
- 2) Grant Petitioner a writ of habeas corpus directing the Respondents to immediately release him from custody, under reasonable conditions of supervision;
- 3) Order Respondents to refrain from transferring Petitioner out of the jurisdiction of this court during the pendency of these proceedings and while the Petitioner remains in Respondents' custody;
- 4) Order Respondents to file a response within 3 days of the filing of this petition;
- 5) Award attorneys' fees to Petitioner; and
- 6) Grant any other and further relief which this Court deems just and proper.

I affirm, under penalty of perjury, that the foregoing is true and correct.

Respectfully submitted this 31st day of July, 2025.

/s/ Helen L Parsonage
Elliot Morgan Parsonage, PLLC
328 N Spring St.
Winston-Salem, NC 27101

NC Bar # 35492
GA Bar # 435330
Attorney for Petitioner

/s/ Jeremy Layne McKinney
McKinney Immigration Law
910 N. Elm St. (P.O. Box 1800)
Greensboro, NC 27401 (27402)
N.C. Bar # 23318
*(Motion to Appear Pro Hac Vice
Forthcoming)*

CERTIFICATE OF COMPLIANCE

I hereby certify that the document to which this certificate is attached has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1 for documents prepared by computer.

/s/ Helen L Parsonage
Elliot Morgan Parsonage, PLLC
328 N Spring St.
Winston-Salem, NC 27101
NC Bar # 35492
GA Bar # 435330
Attorney for Petitioner

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Mohamed Ali Abubaker Naser

(b) County of Residence of First Listed Plaintiff Stewart
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Helen L. Parsonage, 328 N Spring Street, Winston-Salem, NC 27101

DEFENDANTS

Terrance Dickerson, Todd Lyons, George Sterling, Kristi Noem

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question
(U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance	PERSONAL INJURY	☐ 625 Drug Related Seizure of Property 21 USC 881	☐ 422 Appeal 28 USC 158	☐ 375 False Claims Act
☐ 120 Marine	☐ 310 Airplane	☐ 690 Other	☐ 423 Withdrawal 28 USC 157	☐ 376 Qui Tam (31 USC 3729(a))
☐ 130 Miller Act	☐ 315 Airplane Product Liability		INTELLECTUAL PROPERTY RIGHTS	☐ 400 State Reapportionment
☐ 140 Negotiable Instrument	☐ 320 Assault, Libel & Slander		☐ 820 Copyrights	☐ 410 Antitrust
☐ 150 Recovery of Overpayment & Enforcement of Judgment	☐ 330 Federal Employers' Liability		☐ 830 Patent	☐ 430 Banks and Banking
☐ 151 Medicare Act	☐ 340 Marine		☐ 835 Patent - Abbreviated New Drug Application	☐ 450 Commerce
☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)	☐ 345 Marine Product Liability		☐ 840 Trademark	☐ 460 Deportation
☐ 153 Recovery of Overpayment of Veteran's Benefits	☐ 350 Motor Vehicle	LABOR	☐ 880 Defend Trade Secrets Act of 2016	☐ 470 Racketeer Influenced and Corrupt Organizations
☐ 160 Stockholders' Suits	☐ 355 Motor Vehicle Product Liability	☐ 710 Fair Labor Standards Act	SOCIAL SECURITY	☐ 480 Consumer Credit (15 USC 1681 or 1692)
☐ 190 Other Contract	☐ 360 Other Personal Injury	☐ 720 Labor/Management Relations	☐ 861 HIA (1395ff)	☐ 485 Telephone Consumer Protection Act
☐ 195 Contract Product Liability	☐ 362 Personal Injury - Medical Malpractice	☐ 740 Railway Labor Act	☐ 862 Black Lung (923)	☐ 490 Cable/Sat TV
☐ 196 Franchise		☐ 751 Family and Medical Leave Act	☐ 863 DIWC/DIWW (405(g))	☐ 850 Securities/Commodities/Exchange
		☐ 790 Other Labor Litigation	☐ 864 SSID Title XVI	☐ 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	☐ 791 Employee Retirement Income Security Act	☐ 865 RSI (405(g))	☐ 891 Agricultural Acts
☐ 210 Land Condemnation	☐ 440 Other Civil Rights	IMMIGRATION	FEDERAL TAX SUITS	☐ 893 Environmental Matters
☐ 220 Foreclosure	☐ 441 Voting	☐ 462 Naturalization Application	☐ 870 Taxes (U.S. Plaintiff or Defendant)	☐ 895 Freedom of Information Act
☐ 230 Rent Lease & Ejectment	☐ 442 Employment	☐ 465 Other Immigration Actions	☐ 871 IRS—Third Party 26 USC 7609	☐ 896 Arbitration
☐ 240 Torts to Land	☐ 443 Housing/Accommodations			☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
☐ 245 Tort Product Liability	☐ 445 Amer. w/Disabilities - Employment			☐ 950 Constitutionality of State Statutes
☐ 290 All Other Real Property	☐ 446 Amer. w/Disabilities - Other			
	☐ 448 Education			
	PRISONER PETITIONS			
	☒ 463 Alien Detainee			
	☐ 510 Motions to Vacate Sentence			
	☐ 530 General			
	☐ 535 Death Penalty			
	Other:			
	☐ 540 Mandamus & Other			
	☐ 550 Civil Rights			
	☐ 555 Prison Condition			
	☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. § 2241(c)(1)

Brief description of cause:
Habeas Corpus

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

07/31/2025

SIGNATURE OF ATTORNEY OF RECORD

/s/ Helen Parsonage

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
(b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
(c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. **Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. **Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

EXHIBIT A

U.S. Department of Justice
Immigration and Naturalization Service

Certificate of Eligibility for Nonimmigrant (F-1) Student
Status - For Academic and Language Students (OMB NO. 1653-0038)

Page 1

Please read Instructions on Page 2

This page must be completed and signed in the U.S. by a designated school official.

SEVIS

1. Family Name (surname): Al Taher		Dependent's Family Name (surname): Naser		Dependent's Copy #0007495922
First (given) Name: Arwa Mohamed Alnaas		Dependent's First (given) Name: Mohamed Ali Abubakar		
Middle Name:		Dependent's Middle Name:		
Country of birth: LIBYA	Admission number:	Country of birth: LIBYA	Admission number:	
Country of citizenship: LIBYA	Admission number:	Country of citizenship: LIBYA	Admission number:	

2. School (School district) name: University of North Carolina at Greensboro Univ. North Carolina at Greensboro		For Immigration Official User	
School Official to be notified of student's arrival in U.S. (Name and Title): Michael Elliott Director of International Student & Scholar Services		Visa issuing post	
School address (include zip code): 1000 Spring Garden Street PO Box 26170 Greensboro, NC 27402-6170		Date Visa Issued	
School code (including 3-digit suffix, if any) and approval date: ATL214#10292000 approved on 02/04/2003		Reinstated, extension granted to:	

3. This certificate is issued to the student named above for:
Use by dependents for entering United States.

4. Level of education the student is pursuing or will pursue in the United States:
DOCTORATE

5. The student named above has been accepted for a full course of study at this school, majoring in **Geography**.
The student is expected to report to the school no later than **08/23/2010** and complete studies not later than **05/31/2015**. The normal length of study is **60** months.

6. English proficiency:
This school requires English proficiency.
The student is not yet proficient. English instructions will

7. This school estimates the student's average costs for an academic term of **9** (up to 12) months to be:

a. Tuition and fees	\$	15,814.00
b. Living expenses	\$	8,143.00
c. Expenses of dependents (3)	\$	15,600.00
d. Other (specify): Books, Supplies	\$	1,720.00
Total	\$	41,277.00

8. This school has information showing the following as the student's means of support, estimated for an academic term of **9** months (Use the same number of months given in item 7).

a. Student's personal funds	\$	0.00
b. Funds from this school	\$	0.00
Specify type:		
c. Funds from another source	\$	41,277.00
Specify type: Scholarship from Sabha Univer		
d. On-campus employment	\$	0.00
Total	\$	41,277.00

9. Remarks:

10. School Certification: I certify under penalty of perjury that all information provided above in items 1 through 9 was completed before I signed this form and is true and correct; I executed this form in the United States after review and evaluation in the United States by me or other officials of the school of the student's application, transcripts, or other records of courses taken and proof of financial responsibility, which were received at the school prior to the execution of this form; the school has determined that the above named student's qualifications meet all standards for admission to the school; the student will be required to pursue a full course of study as defined by 8 CFR 214.2(f)(6); I am a designated official of the above named school and am authorized to issue this form.

Michael Elliott Director of International-
al Student & Scholar Servi
Name of School Official Signature of Designated School Official Title Date Issued 07/23/2010 Place Issued (city and state) Greensboro, NC

11. Student Certification: I have read and agreed to comply with the terms and conditions of my admission and those of any extension of stay as specified on page 2. I certify that all information provided on this form refers specifically to me and is true and correct to the best of my knowledge. I certify that I seek to enter or remain in the United States temporarily, and solely for the purpose of pursuing a full course of study at the school named on page 1 of this form. I also authorize the named school to release any information from my records which is needed by the INS pursuant to 8 CFR 214.3(g) to determine my nonimmigrant status.

Arwa Al Taher
Name of Student Signature of Student Date 7/31/2010

Name of parent or guardian Signature of parent or guardian Address (city) (State or Province) (Country) (Date)

Please read Instructions on Page 2

This page must be completed and signed in the U.S. by a designated school official.

SEVIS

1. Family Name (surname): Al Tahar		Dependent's Family Name (surname): Naser	
First (given) Name: Arwa Mohamed Alnaass	Middle Name:	Dependent's First (given) Name:	Dependent's Middle Name:
Country of birth: LIBYA	Date of birth (mo/day/year): [X]	Dependent's Country of birth: LIBYA	DOB (mo/day/year): [X]
Country of citizenship: LIBYA	Admission number:	Dependent's Country of Citizenship: LIBYA	Admission number:

Dependent's Copy
N0007495933

2. School (School district) name: University of North Carolina at Greensboro Univ. North Carolina at Greensboro	
School Official to be notified of student's arrival in U.S. (Name and Title): Michael Elliott Director of International Student & Scholar Services	
School address (include zip code): 1000 Spring Garden Street PO Box 26170 Greensboro, NC 27402-6170	
School code (including 3-digit suffix, if any) and approval date: ATL214F10292000 approved on: 02/04/2003	

For Immigration Official Use	
Visa issuing place: Tripoli	Date Visa Issued: 12 Oct 2010
Reinstated, extension granted for:	

3. This certificate is issued to the student named above for: Use by dependents for entering United States.	
4. Level of education the student is pursuing or will pursue in the United States: DOCTORATE	
5. The student named above has been accepted for a full course of study at this school, majoring in Geography . The student is expected to report to the school no later than 01/03/2011 and complete studies not later than 12/31/2016 . The normal length of study is 72 months.	
6. English proficiency: This school requires English proficiency. The student is not yet proficient. English instructions will	
7. This school estimates the student's average costs for an academic term of 9 (up to 12) months to be:	
a. Tuition and fees	\$ 16,083.00
b. Living expenses	\$ 8,279.00
c. Expenses of dependents (3)	\$ 15,600.00
d. Other (specify): Books, Supplies	\$ 1,720.00
Total	\$ 41,682.00

8. This school has information showing the following as the student's means of support, estimated for an academic term of 9 months (Use the same number of months given in item 7).	
a. Student's personal funds	\$ 0.00
b. Funds from this school	\$ 0.00
Specify type:	
c. Funds from another source	\$ 41,682.00
Specify type: Scholarship from Sabha Univer	
d. On-campus employment	\$ 0.00
Total	\$ 41,682.00

9. Remarks:

10. School Certification: I certify under penalty of perjury that all information provided above in items 1 through 9 was completed before I signed this form and is true and correct; I executed this form in the United States after review and evaluation in the United States by me or other officials of the school of the student's application, transcripts, or other records of courses taken and proof of financial responsibility, which were received at the school prior to the execution of this form; the school has determined that the above named student's qualifications meet all standards for admission to the school; the student will be required to pursue a full course of study as defined by 8 CFR 214.2(f)(6); I am a designated official of the above named school and am authorized to issue this form.

Director of International-
al Student & Scholar Servi

Michael Elliott 12/22/2010 Greensboro, NC
Name of School Official Signature of Designated School Official Title Date Issued Place Issued (city and state)

11. Student Certification: I have read and agreed to comply with the terms and conditions of my admission and those of any extension of stay as specified on page 2. I certify that all information provided on this form refers specifically to me and is true and correct to the best of my knowledge. I certify that I seek to enter or remain in the United States temporarily, and solely for the purpose of pursuing a full course of study at the school named on page 1 of this form. I also authorize the named school to release any information from my records which is needed by the INS pursuant to 8 CFR 214.3(g) to determine my nonimmigrant status.

25/12/2010
Name of Student Signature of Student Date

Name of parent or guardian Signature of parent or guardian Address (city) (State or Province) (Country) (Date)
If student under 18

SEVIS ID: N0007495922

SURNAME/PRIMARY NAME Naser	GIVEN NAME Mohamed Ali Abubaker	CLASS F-2
PREFERRED NAME Mohamed Ali Abubaker Naser	PASSPORT NAME Naser Mohamed Ali Abubaker	
COUNTRY OF BIRTH LIBYA	COUNTRY OF CITIZENSHIP LIBYA	
DATE OF BIRTH 	ADMISSION NUMBER	
RELATIONSHIP TO STUDENT SPOUSE	LEGACY NAME Mohamed Ali Abubaker Naser	DEPENDENT

STUDENT'S INFORMATION

STUDENT'S SURNAME/PRIMARY NAME Al Taher	STUDENT'S GIVEN NAME Arwa Mohamed Alnaass
STUDENT'S COUNTRY OF BIRTH LIBYA	STUDENT'S DATE OF BIRTH
STUDENT'S COUNTRY OF CITIZENSHIP LIBYA	STUDENT'S ADMISSION NUMBER
STUDENT'S SEVIS ID: 	

STUDENT'S SCHOOL INFORMATION

SCHOOL NAME The University of North Carolina at Greensboro The Univ. North Carolina at Greensboro	SCHOOL CODE AND APPROVAL DATE ATL214F10292000 04 FEBRUARY 2003
--	---

STUDENT'S PROGRAM OF STUDY

EDUCATION LEVEL DOCTORATE	MAJOR 1 Geography 45.0701	MAJOR 2 None 00.0000
NORMAL PROGRAM LENGTH 72 Months	PROGRAM ENGLISH PROFICIENCY Required	ENGLISH PROFICIENCY NOTES Student is proficient
PROGRAM START DATE 03 JANUARY 2011	PROGRAM END DATE 31 DECEMBER 2016	

STUDENT'S FINANCIALS

ESTIMATED AVERAGE COSTS FOR: 9 MONTHS		STUDENT'S FUNDING FOR: 9 MONTHS	
Tuition and Fees	\$ 16,083	Personal Funds	\$ 0
Living Expenses	\$ 8,279	Funds From This School	\$
Expenses of Dependents (3)	\$ 15,600	Scholarship from Sebha University Liby	\$ 41,682
Books, Supplies and Medical Insurance	\$ 1,720	On-Campus Employment	\$
TOTAL	\$ 41,682	TOTAL	\$ 41,682

SCHOOL ATTESTATION

I certify under penalty of perjury that all information provided above was entered before I signed this form and is true and correct. I executed this form in the United States after review and evaluation in the United States by me or other officials of the school of the student's application, transcripts, or other records of courses taken and proof of financial responsibility, which were received at the school prior to the execution of this form. The school has determined that the above named student's qualifications meet all standards for admission to the school and the student will be required to pursue a full program of study as defined by 8 CFR 214.2(f)(6). I am a designated school official of the above named school and am authorized to issue this form.

X **DATE ISSUED** 24 August 2015 **PLACE ISSUED** Greensboro, NC
SIGNATURE OF: Norma Velazquez, Int'l Student Adviser

STUDENT ATTESTATION

I have read and agreed to comply with the terms and conditions of my admission and those of any extension of stay. I certify that all information provided on this form refers specifically to me and is true and correct to the best of my knowledge. I certify that I seek to enter or remain in the United States temporarily, and solely for the purpose of pursuing a full program of study at the school named above. I also authorize the named school to release any information from my records needed by DHS pursuant to 8 CFR 214.3(g) to determine my nonimmigrant status. Parent or guardian, and student, must sign if student is under 18.

X **DATE** 10/30/2015
SIGNATURE OF: Arwa Mohamed Alnaass Al Taher
X
NAME OF PARENT OR GUARDIAN **SIGNATURE** **ADDRESS (city/state or province/country)** **DATE**

SEVIS ID:  (F-2)

NAME: **Mohamed Ali Abubaker
Naser**

REMARKS FOR STUDENT

Student is engaged in dissertation research. Purchase of medical insurance selected by the university is mandatory.

STUDENT'S EMPLOYMENT AUTHORIZATION

EMPLOYMENT STATUS	TYPE
EMPLOYMENT START DATE	EMPLOYMENT END DATE
EMPLOYER NAME	EMPLOYER LOCATION
COMMENTS	

CHANGE OF STATUS/CAP-GAP EXTENSION

REQUESTED VISA TYPE	REQUEST/PETITION STATUS	RECEIPT NUMBER	BENEFIT START DATE/REQUEST DATE
---------------------	-------------------------	----------------	---------------------------------

STUDENT'S EVENT HISTORY

EVENT NAME	EVENT DATE
Registration	31 JANUARY 2011

OTHER STUDENT AUTHORIZATIONS

AUTHORIZATION	START DATE	END DATE
---------------	------------	----------

TRAVEL ENDORSEMENT

This page when properly endorsed, may be used for reentry of the dependent after a temporary absence from the United States. Each certification signature is valid for one year.

SCHOOL OFFICIAL	TITLE	SIGNATURE	DATE ISSUED	PLACE ISSUED
		X		
		X		
		X		
		X		

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

I-20, Certificate of Eligibility for Nonimmigrant Student Status
OMB NO. 1653-0038

SEVIS ID: 

SURNAME/PRIMARY NAME Naser	GIVEN NAME Mohamed Ali Abubaker	Class of Admission F-2 DEPENDENT
PREFERRED NAME Mohamed Ali Abubaker Naser	PASSPORT NAME Naser Mohamed Ali Abubaker	
COUNTRY OF BIRTH LIBYA	COUNTRY OF CITIZENSHIP LIBYA	
DATE OF BIRTH 	ADMISSION NUMBER	
RELATIONSHIP TO STUDENT SPOUSE	LEGACY NAME Mohamed Ali Abubaker Naser	

STUDENT'S INFORMATION

STUDENT'S SURNAME/PRIMARY NAME Al Taher	STUDENT'S GIVEN NAME Arwa Mohamed Alnaass
STUDENT'S COUNTRY OF BIRTH LIBYA	STUDENT'S DATE OF BIRTH 
STUDENT'S COUNTRY OF CITIZENSHIP LIBYA	STUDENT'S ADMISSION NUMBER
STUDENT'S SEVIS ID: 	

STUDENT'S SCHOOL INFORMATION

SCHOOL NAME The University of North Carolina at Greensboro The Univ. North Carolina at Greensboro	SCHOOL CODE AND APPROVAL DATE ATL214F10292000 04 FEBRUARY 2003
--	---

STUDENT'S PROGRAM OF STUDY

EDUCATION LEVEL DOCTORATE	MAJOR 1 Geography 4570701	MAJOR 2 None 00.0000
PROGRAM ENGLISH PROFICIENCY Required	ENGLISH PROFICIENCY NOTES Student is proficient	EARLIEST ADMISSION DATE 04 DECEMBER 2010
START OF CLASSES 03 JANUARY 2011	PROGRAM START/END DATE 03 JANUARY 2011 - 12 MAY 2017	

STUDENT'S FINANCIALS

ESTIMATED AVERAGE COSTS FOR: 9 MONTHS		STUDENT'S FUNDING FOR: 9 MONTHS	
Tuition and Fees	\$ 1,017	Personal Funds	\$ 0
Living Expenses	\$ 5,508	Funds From This School	\$
Expenses of Dependents (3)	\$ 12,480	Scholarship from Sebha University Liby	\$ 20,216
Books, Supplies and Medical Insurance	\$ 1,211	On-Campus Employment	\$
TOTAL	\$ 20,216	TOTAL	\$ 20,216

SCHOOL ATTESTATION

I certify under penalty of perjury that all information provided above was entered before I signed this form and is true and correct. I executed this form in the United States after review and evaluation in the United States by me or other officials of the school of the student's application, transcripts, or other records of courses taken and proof of financial responsibility, which were received at the school prior to the execution of this form. The school has determined that the above named student's qualifications meet all standards for admission to the school and the student will be required to pursue a full program of study as defined by 8 CFR 214.2(f)(6). I am a designated school official of the above named school and am authorized to issue this form.

SIGNATURE OF:  Greta Smith, International Services Coordinator	DATE ISSUED 17 May 2017	PLACE ISSUED Greensboro, NC
--	-----------------------------------	---------------------------------------

STUDENT ATTESTATION

I have read and agreed to comply with the terms and conditions of my admission and those of any extension of stay. I certify that all information provided on this form refers specifically to me and is true and correct to the best of my knowledge. I certify that I seek to enter or remain in the United States temporarily, and solely for the purpose of pursuing a full program of study at the school named above. I also authorize the named school to release any information from my records needed by DHS pursuant to 8 CFR 214.3(g) to determine my nonimmigrant status. Parent or guardian, and student, must sign if student is under 18.

SIGNATURE OF:  Arwa Mohamed Alnaass Al Taher	DATE 5/17/17
SIGNATURE	DATE
NAME OF PARENT OR GUARDIAN	ADDRESS (city/state or province/country)

SEVIS ID:  (F-2)

NAME: Mohamed Ali Abubaker
Naser

REMARKS FOR STUDENT

Major is Geography. To seek employment in the field of Geography. Student graduated at the end of the spring semester on May 12, 2017.

STUDENT'S EMPLOYMENT AUTHORIZATIONS

TYPE	FULL/PART-TIME	STATUS	START DATE	END DATE
POST-COMPLETION OPT	FULL TIME	REQUESTED	11 JULY 2017	10 JULY 2018

CHANGE OF STATUS/CAP-GAP EXTENSION

STUDENT'S CURRENT SESSION DATES

CURRENT SESSION START DATE	CURRENT SESSION END DATE
17 JANUARY 2017	10 MAY 2017

TRAVEL ENDORSEMENT

This page, when properly endorsed, may be used for re-entry of the dependent after a temporary absence from the United States. Each endorsement is valid for one year.

Designated School Official	TITLE	SIGNATURE	DATE ISSUED	PLACE ISSUED
		X		
		X		
		X		
		X		

EXHIBIT B

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

Receipt Number 		Case Type I589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL
Received Date 06/06/2022	Priority Date	Applicant A:  NASER, MOHAMED ALI ABUBAKER
Notice Date 11/02/2022	Page 1 of 1	
MOHAMED NASER  GREENSBORO NC 27407		Notice Type: Receipt Notice

*** ACKNOWLEDGEMENT OF RECEIPT ***

Your complete Form I-589 Application for Asylum and Withholding of Removal was received and is pending as of 06/06/2022.

You may remain in the U.S. until your asylum application is decided. If you wish to leave while your application is pending, you must obtain advance parole from USCIS. If you change your address, send written notification of the change within 10 days to the Asylum Office at the below address or using the USCIS Online Change of Address system at <https://egov.uscis.gov/coa/displayCOAForm.do>.

You will receive a notice informing you when you and those listed on your application as a spouse or child dependents must appear at an Application Support Center (ASC) for biometrics collection. You will also receive a notice informing you when you and those listed on your application as a spouse or dependents must appear for an asylum interview. Those notices will contain instructions for what to bring to your ASC appointment and what to bring to your asylum interview.

WARNING: Failure to appear at the ASC for biometrics collection or for your asylum interview may affect your eligibility for employment authorization, and may also result in the dismissal of your asylum application or referral of your asylum application to an immigration judge.

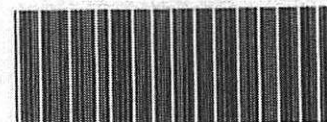
NOTE FOR INDIVIDUALS WHO HAVE MADE VANGALA SETTLEMENT AGREEMENT FILING DATE REQUESTS: If you are receiving this notice after asking USCIS to amend your Form I-589 receipt date under the Vangala Settlement Agreement (i.e., "No Blank Space Rejection Policy"), USCIS has changed your receipt date to the date listed above in our systems. If you are in removal proceedings, USCIS has informed the immigration court and the U.S. Immigration and Customs Enforcement Office of the Principal Legal Advisor (ICE OPLA) field office with jurisdiction over your asylum application of this change.

Applicant(s):
 Alien Number Name
 A  NASER, MOHAMED

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.

Arlington Asylum Office
U.S. CITIZENSHIP & IMMIGRATION SVC
1525 Wilson Boulevard, Suite 300
MS 2500
Arlington VA 20598-2500



USCIS Contact Center: www.uscis.gov/contactcenter

EXHIBIT C



EXHIBIT D



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS



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07/29/2025 06:56 EDT

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Narrative

Title: Record of Deportable/Excludable Alien

Description: [REDACTED]

Date: 07/17/2025

Narrative ID: [REDACTED]

In early 2025, Homeland Security Investigations (HSI) Greensboro received a lead referral from HSI Headquarters. The lead packet concerned suspected Iranian National Mohamed Ali NASER (W/M, DOB: [REDACTED] A [REDACTED]). HSI Greensboro Special Agent (SA) Zachary Neeffe received the lead packet and began working up an intel packet; additionally, SA Neeffe deconflicted this case with the Federal Bureau of Investigation (FBI) Greensboro as well as Immigration & Customs Enforcement (ICE) Enforcement Removal Operations (ERO) Greensboro.

In researching NASER, SA Neeffe learned that there was no investigative overlap with a FBI investigation. Additionally, in researching out NASER's immigration history, it appeared that he came into the United States originally with a F1/F2 student visa as part of the SEVIS program. He subsequently remained in the United States and has since filed for asylum. In discussing these findings with ERO, SA Neeffe confirmed that pending is not the same as having de-facto immigration status; thus, NASER could best be described as an overstay out-of-status.

On July 14, 2025, SA Neeffe, along with Deputy United States Marshals (DUSMs) conducted surveillance on NASER's residence to establish a pattern-of-life. No enforcement actions were conducted on that date. On July 15, 2025, SA Neeffe and DUSMs Peach & Billiter again conducted surveillance on NASER's residence, [REDACTED] Greensboro, NC 27408. On this date, NASER was not observed in the morning hours; however, SA Neeffe and DUSM Peach conducted a "knock-and-talk" at the residence in an attempt to locate NASER around 10:30 AM. NASER's wife and daughter (names not recorded, identities not confirmed) came to the door and were initially cooperative but also standoff-ish. NASER's daughter provided a telephone number for her father and stated he worked as a maintenance man for Wendy's Restaurants. SA Neeffe later attempted to call the number provided by NASER's daughter and the number was out-of-service.

After clearing from the residence, the DUSMs checked additional addresses while SA Neeffe conducted additional database research on NASER. SA Neeffe then located a telephone number for NASER and called him. An individual who identified himself as NASER answered the phone and agreed to meet with SA Neeffe for an inspection of his immigration documents at NASER's

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DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS



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residence. SA Neefe's intention at this point was to check NASER's verbal assertion (by phone) that he had immigration status via an asylum claim. Additionally, SA Neefe wished to question NASER regarding the national security questionnaire sent by headquarters.

NASER arrived at his residence around 12 noon in a work van. Upon arrival at his residence, NASER jumped out of his work van and sprinted to his house despite SA Neefe yelling numerous times at him to stop and talk with him. Upon arrival at the front door of his residence, NASER began pounding on the door and yelling frantically for family members to let him in. As he was at the doorway with it closed, SA Neefe grabbed ahold of NASER's shirt near the back of his collar and also had a hand on the right side of NASER's torso at his beltline. NASER's son (name not recorded, identity not recorded) opened the door and NASER then struggled into his residence with SA Neefe's hands still on his back and near his waist, SA Neefe wedged his boot in between the open door and threshold to prevent it from closing.

At this point, NASER's adult son, daughter, wife, and unknown other family members began pushing the door against SA Neefe as SA Neefe had his hands on NASER in an attempt to effectuate an immigration arrest. NASER was able to wriggle free from SA Neefe's grasp and then turned around and stood facing SA Neefe. NASER verbally identified himself as Mohamed NASER and began yelling loudly at SA Neefe to leave.

For the next approximately 30-45 minutes, SA Neefe attempted to converse with NASER. NASER continued talking over SA Neefe and would not allow SA Neefe to complete a sentence without interrupting. Additionally, NASER's family members also interrupted SA Neefe at multiple times. SA Neefe attempted to explain to NASER about the reason for his interaction with him; however, SA Neefe could not complete this. NASER continued shouting loudly throughout the interaction that SA Neefe and the DUSMs on-scene were "militia" and "very bad men". NASER at one point asked if SA Neefe had children and then yelled something illegible about SA Neefe's children.

Eventually, SA Neefe opted to back out and all law enforcement officers left the residence.

On July 17, 2025, SA Neefe, SA Burton, and DUSMs Peach and Billiter conducted surveillance in the early hours of the morning at the residence. NASER's work van was not present at the residence and for this reason, the law enforcement officers named above broke up and began checking Wendy's Restaurants (due to him likely being at work).

At approximately 8:55 AM, SA Burton located NASER's vehicle at Wendy's Restaurant located at 517 Hickory Ridge Dr., Greensboro, NC 27409. HSI Greensboro Resident Agent in Charge (RAC) Barringer responded to assist SA Burton due to his proximity to SA Burton's location; a few minutes later, RAC Barringer relayed via radio that a subject matching NASER's description (and later identified as NASER) had come out of the restaurant. A short time later, RAC Barringer,

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DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS



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SA Burton, and DUSM Peach were able to take NASER into immigration custody without issue.

NASER was then transported by SA Burton to the ICE / ERO facility in Cary, NC. During the trip, NASER repeatedly called SA Burton "militia" but was otherwise compliant.

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DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS



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07/29/2025 06:55 EDT

Page 1 of 2

Narrative

On July 17, 2025, Homeland Security Investigations (HSI) Greensboro Special Agents (SAs) Zachary Neefe and Matthew Burton were able to locate and place suspect Mohamed Ali Abubaker NASER (W/M, DOB: [REDACTED], A [REDACTED]) under arrest for a civil immigration violation. SA Burton then transported NASER to the Immigration & Customs Enforcement (ICE) Enforcement & Removal Operations (ERO) facility in Cary, North Carolina with SA Neefe following behind in his vehicle.

At 1300 hours, SA Neefe (with SA Burton present for some of this interaction) conducted an interview with NASER in the holding area of ICE ERO. Also present by telephone were Interviewer 1920 through Lionbridge Language Line (providing Arabic language translation) and Immigration Attorney Helen Parsonage. The interview aimed to gather information regarding potential connections to the Iranian government and the impact of the Iran-Israel conflict on NASER and his community. NASER denied any involvement or knowledge related to the conflict, stating that he has no connections to Iran or its government. He expressed that the only impact on him was the manner in which he was taken from his home, calling government agents "very bad men" and "militia".

NASER reported an incident of harassment approximately six months prior, where individuals damaged his property, and he filed a police report. He claimed no knowledge of the local Iranian community's response to the conflict, as he primarily focuses on his work as a technician at Wendy's Restaurants. NASER stated he has no connections to the Iranian government, nor does he know anyone with such connections. He denied any knowledge of Iranian assets or individuals acting on behalf of the Iranian government within the US, Mexico, or Canada. NASER maintained throughout the interview that he is/was a Citizen of Libya and has had no allegiance whatsoever to the Iranian Government.

NASER stated he moved to the US in 2008 as a student, returned to Libya, and came back to the US in 2010. He attended the University of Dayton, Ohio, Guilford Technical Community College (GTCC), and the University of North Carolina at Greensboro, studying English language, telecommunications, and engineering, with his education funded by the Libyan government. He has never been to Iran, held citizenship there, or had any affiliations with the Iranian government. NASER has no military or law enforcement training, except for what he described as

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DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS



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being "trained" by the agents during his encounter with law enforcement. He has never held or fired a weapon and has not worked for any government or political group.

NASER expressed frustration with the US policy and the manner in which he was treated during the encounter at his house, likening the agents' behavior to that of a militia. He reiterated his lack of connections to Iran, its government, or any activities related to the current conflict. The interview concluded with NASER maintaining his stance of having no relevant information or involvement in the matters being investigated.

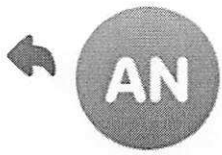
The interview was memorialized in the form of a typed word document that captured NASER's responses to each question as it was read by SA Neefe. The question was then repeated in Arabic by the translator with NASER requested to answer in Arabic so that the translator could then repeat his answer to everyone on the call. NASER had to be stopped several times by the translator, by his attorney, or by SA Neefe due to talking over or otherwise interrupting the Arabic translator. This word document was then converted to a PDF document and was subsequently saved to SA Neefe's agency OneDrive; additionally, the interview responses will be uploaded to ICM DRM for retention purposes along with this Report of Investigation.

Nothing to report further at this time.

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EXHIBIT E

**ali naser**

7/18/25

To: Helen Parsonage >

Re: Draft release

[EXTERNAL] CAUTION: This email originated external to EMP Law. Be wary of links and attachments from unknown sources.

Hey Helen just got a call from my dad and he gave me the following information

he is GA now

146 CCA Rd Lumpkin GA. 31815.

Stewart detention center.

 2293835000

His ID: A



EXHIBIT F



**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
STEWART IMMIGRATION COURT**

Respondent Name:

NASER, MOHAMED ALI ABUBAKER

To:

Parsonage, Helen

P.O. Box 20008

Winston-Salem, NC 27120-0008

A-Number:



Riders:

In Custody Redetermination Proceedings

Date:

07/29/2025

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

☐ Denied, because

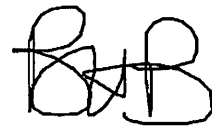
☒ Granted. It is ordered that Respondent be:

☐ released from custody on his own recognizance.

☒ released from custody under bond of \$ 20,000.00

☐ other:

☐ Other:



Immigration Judge: Brown, Bianca 07/29/2025

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

Appeal Due: 08/28/2025

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 | [E] Noncitizen's atty/rep. | [E] DHS

Respondent Name : NASER, MOHAMED ALI ABUBAKER | A-Number : 

Riders:

Date: 07/29/2025 By: Corbin,T, Court Staff

EXHIBIT G

 Recent funds transfers and mobile deposits are displayed below. To view loans and credit card payment activity, please visit [Payment Activity](#).

Online Activity

TRANSACTION DETAILS

ACH BATCH

ACH Name - ICECeBONDSPAYMENTS

\$20,000.00

Tracking ID:



Created Date: 7/29/2025

PAYMENT DETAILS

Created By

Mary Parsonage

Authorized

07/29/2025 5:08 PM

Authorized By

Mary Parsonage

Process Date

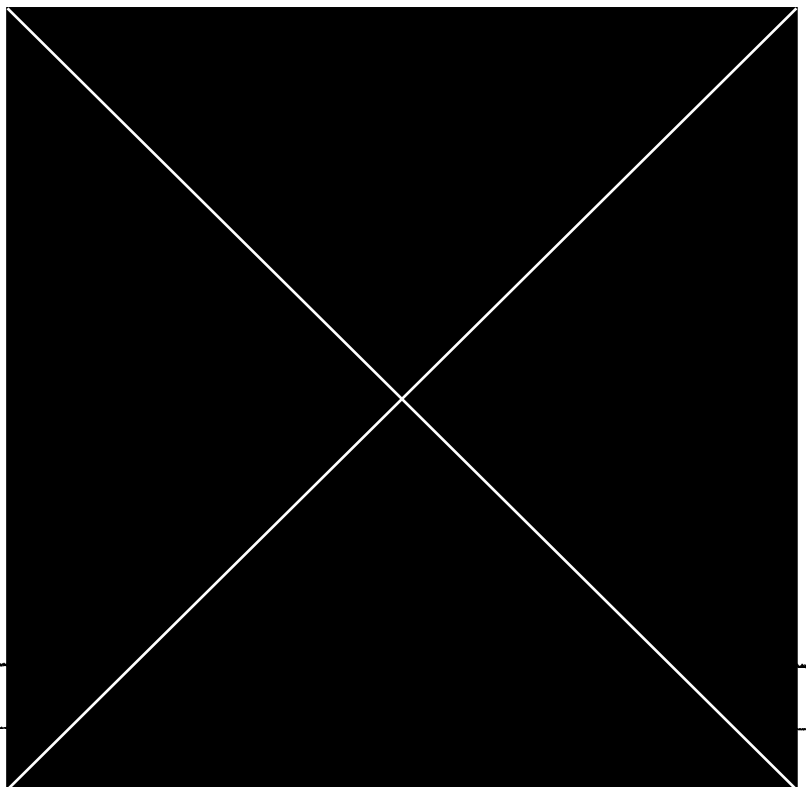
07/29/2025

Effective

07/30/2025

RECIPIENT DETAILS

Name	Account
CeBONDS	XXXXXX513001



Your Progress



You created this bond payment request. (7/29/2025)

Download Identity 



You signed your I-352 bond contract. (7/29/2025)

Download Contract (I-352) 



You uploaded your bond payment receipt. (7/29/2025)

Download Payment 

Action Required:

Your I-352 contract has been denied. See comments from ICE for more detail. If you are given instructions regarding this denial, then click the Sign Contract button below to make any requested corrections and sign a new I-352 contract.



Denial Reason: Other

7/30/2025	Obligor	I am a partner in, and owner of, Elliot Morgan Parsonage PLLC	None
7/30/2025	ICE	Office is trying to trace the funding but the payment receipt not showing the recipient's routing number. Would you upload the transaction receipt that have routing number and accounting number? This would speed up the process.	None
7/30/2025	Obligor	Sent to the account and routing number in the instructions (attached). Our bank xxxx's out all but the last four for security, but you can see they match. Will see if I can locate unredacted - but this should be enough.	Download 
7/30/2025	Obligor	Here is a screenshot showing the numbers without the xxxx's	Download 
7/30/2025	ICE	Alien not bondable due to DHS filing appeal.	None
7/29/2025	ICE	Obligor needs to make travel arrangements.	None
7/29/2025	ICE	Hello, If you can provide the travel info or some info who is picking up the subject. Please let us know. I have sent an email to the STG office to see the office closed.	None
7/29/2025	ICE	Hello, If you can submit the travel ticket info or info who is picking up the subject info. It will be helpful. upload the info by tomorrow.	None
7/29/2025	Obligor	he will be picked up by his sponsor Angela McCormack and her husband Dave. They can pick him up in Columbus at the bus station. They are a 6.5 hour drive away, an approximate time would be great! Thank you.	None
7/30/2025	ICE	Would you clarify the relationship between you and the business account? The funding of this bond process is coming from a business account, and the contract has your name on it not a business account.	None

EXHIBIT H

U.S. Department of Justice
Executive Office for Immigration Review

**Notice of ICE Intent to Appeal Custody
Redetermination**

Date: July 30, 2025

Alien Number: A [REDACTED]

Alien Name: Mohamed Ali Abubaker Naser

1. Immigration and Customs Enforcement (ICE) has:

☒ a. Held the respondent without bond.

☐ b. Set the respondent's bond at \$ _____.

2. The Immigration Judge on July 29, 2025
(Date)

☐ a. Authorized the respondent's release.

☒ b. Redetermined the ICE bond to \$ 20,000.

3. Filing this form on July 30, 2025
(Date) automatically stays the
Immigration Judge's custody redetermination decision. See 8 C.F.R. §1003.19(i)(2).

4. The stay shall lapse if ICE does not file a notice of appeal along with appropriate certification within ten business days of the issuance of the order of the Immigration Judge, or upon ICE's withdrawal of this notice, or as set forth in 8 C.F.R. §1003.6(c)(4) and (5).
See 8 C.F.R. §1003.6(c)(1).

Devin Rees

ICE Counsel

I, Devin Rees, served the Notice of ICE Intent to Appeal Custody Redetermination on
(Name)

Helen Parsonage (P.O. Box 20008, Winston-Salem, NC 27120), on 7/30/2025
(Respondent or Respondent's Representative) (Date)

Devin Rees

Signature

EXHIBIT I

A-Number: XXXXXXXXXX, NASER, MOHAMED ALI
ABUBAKER

Select a case to view details and file documents

Removal Charging Doc. Date: 07/17/2025 **Case Pending**

Bond Charging Doc. Date: 07/17/2025
Bond Request Date: 07/23/2025 **Case Completed**

End of list. Please file a Form EOIR-27 or EOIR-28 using "Appearances" link in the header to view additional cases.

Hearing:
Date:
Bond The Immigration Judge entered a
Decision: new bond amount.

Hearing
Medium: -- NA --

Court Actions

Upload Documents Request a Bond Download eROP File Appeal at BIA

eROP Documents

Document Filters

☒ View All ☐ Filter at the Court ☐ Filter at the BIA

Actions	Document Type	Filed Date ▾	Filed At	Filed By	Document Status
	Other Form	07/30/2025	Court	DHS	Accepted
	Evidence	07/29/2025	Court	DHS	Accepted
	CASE Notice	07/29/2025	Court	OCIJ	Accepted
	Order - Bond Order (Bond)	07/29/2025	Court	OCIJ	List of Documents Accepted