

Joshua A. Altman (CA Bar No. 259565)
ALTMAN IMMIGRATION LAW, PC
6755 Mira Mesa Boulevard, Suite 123105
San Diego, CA 92121
Tel: (858) 251-0858
Fax: (858) 221-0175
josh@altman.law

Attorney for Petitioner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

MEHDI ROKHFIROOZ,

Petitioner,

v.

CHRISTOPHER J. LAROSE, Senior
Warden, Otay Mesa Detention Center;
JOSEPH FREDEN, Acting Field Office
Director, U.S. Immigration and
Customs Enforcement;
TODD M. LYONS, Acting Director, U.S.
Immigration and Customs
Enforcement;
KRISTI NOEM, Secretary of United
States Department of Homeland
Security; and
PAM BONDI, Attorney General of the
United States,

Respondents.

Case No.: '25CV2053 RSH VET

**PETITION FOR WRIT OF HABEAS
CORPUS AND ORDER TO SHOW
CAUSE WITHIN THREE DAYS AND
COMPLAINT FOR INJUNCTIVE AND
DECLARATORY RELIEF**

Petitioner Mehdi Rokhfirooz petitions this Court for a writ of habeas corpus under 28 U.S.C. § 2241 to remedy Respondents' detaining him unlawfully, and states as follows:

INTRODUCTION

1. Mehdi Rokhfirooz is a forty-eight-year-old Iranian man detained at Otay Mesa Detention Center in San Diego, California. He submits this habeas petition under 28 U.S.C. § 2241 for a judicial check on Respondents' unlawful revocation of his release on an Order of Supervision and Unsupervised Parole ("OSUP") and detaining him without belief that his removal from the United States is reasonably foreseeable.

2. In June 2004, an immigration judge at the Immigration Court in San Diego, California, granted Rokhfirooz withholding of removal as to Iran, on account of the past persecution he suffered in that country because of his political activities as a member of a student group during his sophomore year at Tehran University.

3. The government released him from custody shortly after the IJ granted protection. And ICE issued him an OSUP on October 17, 2005. And from that time until June 2025, he dutifully reported to Immigration and Customs Enforcement (ICE) under OSUPs that required him to check in with ICE periodically.

4. But in June 2025, twenty-one years after an IJ granted him withholding of removal and ICE released him and nearly twenty years after ICE issued him an OSUP, without any notice—much less the process that was due—ICE officers arbitrarily canceled his OSUP, arrived at his door, and took him into custody. And only then did ICE officers begin to look for a third country to provide travel authorization.

5. ICE's withdrawal of Rokhfirooz's OSUP and subsequent detention was permissible only if ICE could demonstrate that removal could occur "in the reasonably foreseeable future" or if he had violated release conditions—neither of which occurred here. *See Zadvydas v. Davis*, 533 U.S. 678 (2001); 8 C.F.R. § 241.13(h)(4).

1 6. Under the Supreme Court’s holding in *Zadvydas*, ICE may only detain
2 individuals after the removal period if there is a “reasonable foreseeability” of
3 removal within a predictable timeframe. Here, ICE’s own actions in beginning to
4 search for a third country only after taking Petitioner into custody demonstrate
5 the absence of any such reasonable foreseeability.

6 7. Moreover, even assuming that ICE possessed theoretical authority to
7 revoke release, the agency failed to meet mandatory procedural requirements,
8 including the obligation to establish “a significant likelihood that the [non-citizen]
9 may be removed in the reasonably foreseeable future” under 8 C.F.R.
10 § 241.13(i)(2) and to provide him with notice of the specific reasons for
11 revocation as 8 C.F.R. § 241.13(i)(3) requires. ICE’s actions were all the more
12 egregious because they occurred well beyond the ninety-day removal period
13 established by law (*see* 8 U.S.C. § 1231(a)(1)(A)), and only after Rokhfirooz had
14 been living lawfully in the community for two decades following an IJ’s grant of
15 withholding of removal.

16 8. ICE’s arbitrary cancellation of Petitioner’s OSUP and subsequent
17 detention constitute flagrant violations of due process and regulatory law.

18 9. Absent review in this Court, no other neutral adjudicator will examine
19 Rokhfirooz’s plight: Respondents will continue—unchecked—to detain him—
20 potentially indefinitely—unless or until they remove him to an as-yet-
21 undetermined country, despite *Zadvydas*’s and the regulatory requirements. He
22 thus urges this Court to review the lawfulness of his detention; declare that his
23 detention is unlawful; and order either his immediate release or that Respondents
24 provide him a bond hearing complying with the procedural requirements in *Singh*
25 *v. Holder*, 638 F.3d 1196 (9th Cir. 2011).

1 **CUSTODY**

2 10. Rokhfirooz is currently in Respondents' legal and physical custody.
3 They are detaining him at the Otay Mesa Detention Center in San Diego, California.
4 He is under Respondents' and their agents' direct control.

5 **PARTIES**

6 11. Petitioner Rokhfirooz is a citizen of Iran. He fled that country because
7 he suffered past persecution and fears future persecution there. He arrived in the
8 United States in August 2000 to seek asylum. An immigration judge granted him
9 withholding of removal as to Iran in June 2004. And he was at liberty—and
10 complying with all check-in obligations—until Respondents detained him on
11 June 23, 2025.

12 12. Rokhfirooz is currently in Respondents' legal and physical custody at
13 the Otay Mesa Detention Center in San Diego, California. CoreCivic, Inc., a
14 Maryland corporation, operates that facility.

15 13. Respondent Christopher J. LaRose is the Senior Warden at the Otay
16 Mesa Detention Center, where Rokhfirooz is being held. Respondent Larose is
17 Rokhfirooz's immediate custodian. Rokhfirooz sues him in his official capacity.

18 14. Respondent Joseph Freden is the Acting Director of ICE's San Diego
19 Field Office for Enforcement and Removal Operations. That office determines
20 whether Rokhfirooz will be detained in ICE custody or released. Respondent
21 Freden has custodial authority over Rokhfirooz, who names him in his official
22 capacity.

23 15. Respondent Todd M. Lyons is the Acting Director of ICE. ICE is a
24 component of the DHS, 6 U.S.C. § 271, and an "agency" within the meaning of
25 the Administrative Procedure Act, 5 U.S.C. § 701(b)(1). It is the agency
26 responsible for enforcing immigration laws, and it is detaining Rokhfirooz.
27 Respondent Lyons has custodial authority over Rokhfirooz, who names him in his
28 official capacity.

16. Respondent Kristi Noem is the Secretary of the DHS. DHS is the federal agency responsible for enforcing immigration laws and granting immigration benefits. *See* 8 U.S.C. § 1103(a); 8 C.F.R. § 2.1. Respondent Noem has ultimate custodial authority over Rokhfirooz, who names her in her official capacity.


JURISDICTION AND VENUE

19. This Court has jurisdiction under 28 U.S.C. § 1331, § 2241; 5 U.S.C. §§ 701–706 (Administrative Procedure Act, “APA”); and the Suspension Clause, U.S. Const. art. I, § 9, cl. 2, and the Fifth and Eighth Amendments of the United States Constitution. Jurisdiction is not limited by a petitioner’s nationality, immigration status, or any other classification. *See Boumediene v. Bush*, 553 U.S. 723, 747 (2008). The Court may grant relief under the Suspension Clause; the Fifth and Eighth Amendments; 5 U.S.C. § 706 (APA); and 28 U.S.C. §§ 1361 (Mandamus Act), 1651 (All Writs Act), 2001 (Declaratory Judgment Act), and 2241 (habeas corpus).

1 Constitution or laws or treaties of the United States” (28 U.S.C. § 2241(c)(3)),
2 and this authority extends to immigration detention challenges that survived the
3 REAL ID Act’s jurisdictional restrictions. Because Rokhfirooz seeks the traditional
4 habeas remedy of release from allegedly unlawful detention, his petition presents
5 precisely the type of threshold legality-of-detention question that § 2241 was
6 designed to address. *See INS v. St. Cyr*, 533 U.S. 289, 301 (2001); *see also Lopez-*
7 *Marroquin v. Barr*, 955 F.3d 759, 759 (9th Cir. 2020) (citing *Singh*, 638 F.3d at
8 1211-12)). And federal courts are not stripped of jurisdiction under 8 U.S.C.
9 § 1252. *See, e.g., Zadvydas v. Davis*, 533 U.S. 678, 687 (2001). No court has ruled
10 on the legality of Rokhfirooz’s detention.

11 21. Venue is proper in this District under 28 U.S.C. §§ 1391(b)(2) and
12 (e)(1) because a substantial part of the events or omissions giving rise to this
13 claim have happened here, Rokhfirooz is detained here, and his custodian resides
14 here. Venue is also proper under 28 U.S.C. § 2243 because Rokhfirooz’s
15 immediate custodian resides in this District. *See Rumsfeld v. Padilla*, 542 U.S. 426,
16 451-52 (2004) (Kennedy, J., concurring).

17 FACTUAL BACKGROUND

18 22. Rokhfirooz is a native and citizen of Iran, born in Esfahan, Iran, in
19  1977.

20 23. DHS placed Rokhfirooz in removal proceedings in December 2003,
21 after Rokhfirooz’s U.S. citizen wife withdrew the visa petition she filed on his
22 behalf, causing U.S. Citizenship and Immigration Services to deny the adjustment
23 of status application he filed in January 2002.¹

27 ¹ Rokhfirooz and his wife are still married. And Rokhfirooz has a visa
28 petition based on that marriage currently pending before USCIS.

1 24. Rokhfirooz's counsel waived his right to pursue asylum, conceding
2 that Rokhfirooz was time-barred from pursuing that relief, which requires
3 applying within one year of the applicant's last entry unless an exception applies.²

4 25. On June 17, 2004, an IJ at the Immigration Court in San Diego,
5 California, entered a removal order against Rokhfirooz and granted him
6 withholding of removal as to Iran under both the Immigration and Nationality Act
7 and the Convention Against Torture. The IJ's order included a handwritten
8 annotation stating that Rokhfirooz could move to reopen the removal proceedings
9 for the IJ to enter a voluntary departure order if the government were to find a
10 third country for removal.

11 26. On information and belief, ICE release Rokhfirooz shortly after the IJ
12 entered the order withholding his removal to Iran. And on October 17, 2005, ICE
13 issued Rokhfirooz an OSUP.

14 27. In January 2011, San Diego police officers arrested Rokhfirooz in
15 relation to a domestic incident. But they released him without charges or any
16 future court dates. ICE issued a detainer, so when they released Rokhfirooz, San
17 Diego police released him to ICE, which then in turn released him on his existing
18 OSUP, advising him of his release and reporting requirements.

19 28. In December 2012, federal officers arrested Rokhfirooz in connection
20 with a prosecution against his employer. He posted bond on December 20, 2012.
21 And ICE issued him a new OSUP the next day, December 21, 2012. Prosecutors
22 later dropped all charges against Rokhfirooz after his employer explained to
23 authorities that Rokhfirooz and the other manager were not involved.³

25 ² His immigration counsel inexplicably failed to raise Rokhfirooz's one-step
26 adjustment of status process as supporting an exception to the one-year-filing
27 deadline.

28 ³ See *United States v. Bahador*, No. 3:12-cr-05229-JAH-3 (S.D. Cal. filed
Dec. 20, 2012) (proceedings terminated as to defendant Rokhfirooz, June 12,

1 29. After those incidents, and as he had with the OSUP issued on
2 October 17, 2005, Rokhfirooz dutifully checked in with ICE under the OSUP
3 issued on December 21, 2012, until ICE arrested him at his home on June 23,
4 2025.

5 30. On June 23, 2025, ICE officers arrived at Rokhfirooz's residence at
6 and proceeded to arrest him.

7 31. On information and belief, prior to his detention, Petitioner was given
8 no notice of ICE's intention to re-detain him, and he was not provided with any
9 information about why his OSUP was presumably revoked.

10 32. On information and belief, ICE has no particularized evidence that
11 Petitioner can be removed to any third country.

12 33. On information and belief, Petitioner has not received an
13 individualized hearing before a neutral decisionmaker to assess whether his
14 recent re-detention is warranted due to danger or flight risk.

15 34. Upon Rokhfirooz's detention, his counsel apprised ICE of his
16 representation by counsel; his receipt of withholding of removal to Iran based on
17 persecution he suffered in that country; and his fear of removal to third countries
18 based on his actual or imputed political opinions, his ties to the United States
19 (including that he is married to a United States citizen), and the documented
20 practices of those third countries to hold noncitizens in conditions rising to
21 torture.

22 35. On June 24, 2025, his counsel provided Rokhfirooz a Letter of
23 Representation to provide his assigned deportation officer, Deportation Officer
24 Diaz. Ex. C. On June 25, 2025, and again on July 2, 2025, his counsel emailed a
25 fully executed appearance form to ICE's Detained Unit at the detention center,
26 requesting that DO Diaz contact him as soon as possible. Ex. D.

27
28 2014); Kristina Davis, Drug Dealers' Car Dealers Plead Guilty, SAN DIEGO
UNION-TRIBUNE, July 12, 2014.

1 36. When neither the Detained Unit nor DO Diaz responded, on July 3,
2 2025, his counsel then emailed the ICE, Office of the Principal Legal Advisor, San
3 Diego Field Location's Duty Attorney. Ex. E. His counsel explained that
4 Rokhfirooz's assigned officer, DO Diaz, had not yet contacted him—despite emails
5 and voicemail messages—to discuss Mr. Rokhfirooz's detention and ICE's
6 intentions; that another officer, DO Lara, had told him by phone that he saw no
7 reason in the record why ICE detained Rokhfirooz; and that another officer, DO
8 Aguilar, had speculated about the reasons but advised contacting OPLA. He
9 requested that the OPLA Duty Attorney contact him as soon as possible. Again, no
10 one responded.

11 37. Finally, on July 8, 2025, more than two weeks after ICE officers
12 arrested Rokhfirooz at his home, Rokhfirooz's newly assigned deportation officer,
13 DO Christopher L. Bergman, called Rokhfirooz's counsel. He told counsel that
14 Rokhfirooz's removal was not imminent, he had not yet begun work on
15 Rokhfirooz's case, and he would soon begin contacting three countries for travel
16 authorization; and he emailed Rokhfirooz's counsel to provide his contact
17 information. Ex. F. Rokhfirooz's counsel replied with additional information about
18 Rokhfirooz's receipt of withholding of removal and his fear of removal to third
19 countries, explained why ICE lacked authority to detain Rokhfirooz as the
20 removal period had ended long ago and no event had made his removal
21 reasonably foreseeable, and that—to the contrary—Rokhfirooz is the subject of a
22 pending Form I-360, Petition for Amerasian, Widow(er), or Special Immigrant,
23 which he filed with U.S. Citizenship and Immigration Services on July 1, 2025,
24 and when granted, will support his adjustment of status to lawful permanent
25 residence; and he attached the Letter of Representation and a full copy of the
26 Form I-360 filing and proof of delivery. Ex. F.

27 38. In a phone call on July 16, 2025, DO Bergman apprised Rokhfirooz's
28 counsel that he had sent requests to Canada, the United Kingdom, and Ireland on

1 July 12, 2025, had received a negative travel response from Canada, was still
2 awaiting travel responses from the UK and Ireland, and expected to prepare a
3 memorandum on release for headquarters review shortly after receiving those
4 responses or on August 11, 2025 (thirty days after July 12, 2025).

5 39. On July 24, 2025, Rokhfirooz's counsel again spoke with DO Bergman
6 by phone. DO Bergman asked that he email his request for an update, which he
7 did. Ex. F.

8 40. When he received no response, Rokhfirooz's counsel called DO
9 Bergman back on July 28, 2025. DO Bergman stated he had still received no
10 responses from the United Kingdom and Ireland and confirmed that he intended
11 to send a memorandum on August 11, 2025, if he did not receive responses
12 sooner. And he again confirmed that Rokhfirooz's removal was not imminent.

13 41. During their next phone call, on August 4, 2025, DO Bergman again
14 confirmed that his current plan was to send a release memorandum on August 11,
15 2025. On questioning, DO Bergman apprised Rokhfirooz's counsel that he was
16 unaware of any instance in which headquarters had approved a release in this
17 context.

18 EXHAUSTION OF REMEDIES

19 42. Rokhfirooz has exhausted all administrative remedies, and no further
20 ones are available.

21 LEGAL FRAMEWORK

22 43. Section 1231(a) of Title 8 governs the detention of individuals whom
23 immigration courts have ordered removed. The statute commands ICE to detain
24 these individuals for ninety days while it executes the removal order. See 8 U.S.C.
25 § 1231(a)(2). The ninety-day removal period starts the moment the removal
26 order becomes final. Absent an applicable exception, ICE must release the person
27 under supervision if it cannot complete removal within ninety days. See 8 U.S.C.
28 § 1231(a)(3).

1 44. Subsection 1231(a)(6) authorizes ICE to extend detention beyond the
2 ninety-day period, yet it bars indefinite custody. *See Zadvydas*, 533 U.S. at 689
3 (limiting ICE’s authority to a period “reasonably necessary” to carry out removal
4 and prohibiting detention when removal is not “reasonably foreseeable”).

5 45. Regulations allow ICE to release a non-citizen after the ninety-day
6 removal period if the agency determines that the non-citizen “would not pose a
7 danger to the public or a risk of flight, without regard to the likelihood of the
8 [non-citizen’s] removal in the reasonably foreseeable future.” 8 C.F.R.
9 § 241.13(b)(1). ICE typically places these individuals on an OSUP, as it has done
10 with Rokhfirooz for the past twenty years. *See* 8 C.F.R. § 241.4(j); 8 C.F.R.
11 § 241.13(h).

12 46. ICE may withdraw release approval if it can effectuate removal “in the
13 reasonably foreseeable future” or if the non-citizen violates the release conditions.
14 8 C.F.R. § 241.13(h)(4). ICE may revoke release only when “there is a significant
15 likelihood that the [non-citizen] may be removed in the reasonably foreseeable
16 future.” *Id.* § 241.13(i)(2). Upon revocation, ICE must notify the non-citizen of
17 the reasons for the revocation. *Id.* § 241.13(i)(3).

18 **FIRST CAUSE OF ACTION**

19 **Unlawful Revocation of Release**

20 47. Rokhfirooz re-alleges and incorporates by reference, as if fully set
21 forth herein, the allegations in paragraphs 1-46 above.

22 48. Rokhfirooz was previously detained by ICE and released because his
23 removal could not occur. If he complies with the conditions of this OSUP,
24 Respondents have the authority to revoke his release only if there is a significant
25 likelihood that they can remove him in the reasonably foreseeable future. *See* 8
26 C.F.R. § 241.13(i)(2).

27 49. Respondents revoked Rokhfirooz’s release without evidence that he
28 can be removed to a third country. Indeed, at the time of his detention, ICE had

1 not even decided which country it would attempt to remove him to, let alone
2 whether such removal could be done in the reasonably foreseeable future.

3 50. Respondents' actions are arbitrary, capricious, an abuse of discretion,
4 and contrary to law. 5 U.S.C. § 706(a)(2)(A). Rokhfirooz is entitled to immediate
5 release on an OSUP.

6 **SECOND CAUSE OF ACTION**

7 **Violation of Procedures for Revocation of Release**

8 51. Rokhfirooz re-alleges and incorporates by reference, as if fully set
9 forth herein, the allegations in paragraphs 1-46 above.

10 52. The governing regulations require Respondents to notify Rokhfirooz
11 of the reason for his re-detention. 8 C.F.R. § 241.13(i)(3). Respondents have not
12 complied with this obligation, nor have they yet provided him with an initial
13 interview at which he can respond to the purported reasons for revocation. *Cf. id.*
14 As such, Rokhfirooz is entitled to immediate release on OSUP until ICE can
15 provide the minimal process required by the regulations.

16 **THIRD CAUSE OF ACTION**

17 **Unlawful Detention Where Removal is Not Reasonably Foreseeable**

18 53. Rokhfirooz re-alleges and incorporates by reference, as if fully set
19 forth herein, the allegations in paragraphs 1-46 above.

20 54. Post-removal order detention violates 8 U.S.C. § 1231(a)(6) where
21 removal is not significantly likely to occur in the reasonably foreseeable future.
22 *See also Zadvydas v. Davis*, 533 U.S. 678 (2001).

23 55. Detention where removal is not reasonably foreseeable also violates
24 due process.

25 56. The ninety-day removal period ended in 2004. And ICE determined it
26 could not effectuate Rokhfirooz's removal and issued him an OSUP. Given that the
27 United States did not then find—and in the intervening decades has not since
28 found—a third country for removal, Rokhfirooz has made an initial showing

1 under *Zadvydas* that his removal is not significantly likely. *Zadvydas*, 533 U.S. at
2 701. Respondents cannot rebut this showing, as they do not have any
3 individualized evidence to believe that Rokhfirooz's removal is reasonably
4 foreseeable, as demonstrated by DO Bergman's statements confirming that ICE
5 had not yet begun to request travel authorizations for third countries two weeks
6 after ICE officers re-detained Rokhfirooz.

7 57. Rokhfirooz's re-detention under these circumstances violates 8 U.S.C.
8 § 1231 and the Due Process Clause under the United States Constitution.

9 58. Rokhfirooz is entitled to immediate release on an OSUP.

10 **FOURTH CAUSE OF ACTION**

11 **Unlawful Detention Without Individualized Determination of Danger or** 12 **Flight Risk**

13 59. Rokhfirooz re-alleges and incorporates by reference, as if fully set
14 forth herein, the allegations in paragraphs 1-46 above.

15 60. Detention violates 8 U.S.C. § 1231 and the Due Process Clause of the
16 United States Constitution unless it is reasonably related to the government's
17 purpose of preventing flight and protecting the community. *Zadvydas*, 533 U.S. at
18 690-91.

19 61. Before being re-detained, Rokhfirooz lived in the community for
20 twenty-one years, in compliance with the terms of his OSUP. And he has received
21 no process to determine whether his re-detention is warranted.

22 62. Rokhfirooz is entitled to an individualized determination by impartial
23 adjudicators as to whether detention is justified based on danger or flight. *See also*
24 *Singh v. Holder*, 638 F.3d 1196 (9th Cir. 2011).

25 **PRAYER FOR RELIEF**

26 Rokhfirooz asks this Court to grant the following relief:

- 27 1. Assume jurisdiction over this matter;
- 28

1 2. Issue the writ of habeas corpus and order Respondents to show cause,
2 within three days of Rokhfirooz's filing this petition, why the relief he seeks
3 should not be granted; and set a hearing on this matter within five days of
4 Respondents' return on the order to show cause (*see* 28 U.S.C. § 2243);

5 3. Declare that Respondents have violated Rokhfirooz's rights;

6 4. Order Respondents to notify Rokhfirooz of the reasons for the
7 revocation of his release and provide Rokhfirooz with a prompt interview as
8 required by regulation;

9 5. Order Respondents to release Rokhfirooz from detention because they
10 lack any individualized evidence that removal of Rokhfirooz will occur in the
11 reasonably foreseeable future;

12 6. Order Respondents to release Rokhfirooz from detention absent an
13 individualized determination by an impartial adjudicator that his detention is
14 justified based on danger or flight risk, which cannot be sufficiently addressed by
15 alternative conditions of release or supervision;

16 7. Enjoin Respondents from revoking Rokhfirooz's release unless they
17 have individualized evidence that his removal is reasonably foreseeable;

18 8. Enjoin Respondents from revoking Rokhfirooz's release without
19 providing him a determination by an impartial adjudicator that his detention is
20 justified based on danger or flight risk, which cannot be sufficiently addressed by
21 alternative conditions of release or supervision, at which hearing Respondents will
22 bear the burden of proof of demonstrating that Rokhfirooz is a flight risk or a
23 danger to the community;

24 9. Award reasonable attorneys' fees and costs under the Equal Access to
25 Justice Act, 28 U.S.C. § 2412(d), 5 U.S.C. § 504, or any other applicable law; and
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28

1 10. Grant any other relief that the Court may deem just and proper.
2

3 Dated: August 11, 2025

Respectfully submitted,

5 By: /s/ Joshua A. Altman
6 Joshua A. Altman

7 Attorney for Petitioner
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10 **TABLE OF EXHIBITS**

11 **Exhibit A:** Order of the Immigration Judge

12 **Exhibit B:** Order of Supervision Documents

13 **Exhibit C:** Letter of Representation from counsel, dated June 24, 2025

14 **Exhibit D:** Emails from counsel to U.S. Immigration and Customs Enforcement,
15 Enforcement and Removal Operations, OMDL Detained Unit, dated
16 June 25, 2025, and July 2, 2025

17 **Exhibit E:** Email from counsel to U.S. Immigration and Customs Enforcement,
18 Office of the Principal Legal Advisor, San Diego Field Location, Duty
Attorney, dated July 3, 2025

19 **Exhibit F:** Emails from counsel to U.S. Immigration and Customs Enforcement,
20 Enforcement and Removal Operations, Deportation Officer
Christopher L. Bergman, dated July 8, 2025, and July 24, 2025
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1 **VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF**
2 **PURSUANT TO 28 U.S.C. § 2242**

3 I, Joshua A. Altman, do depose and state:

4 I represent Petitioner Rokhfirooz in these habeas corpus proceedings.
5 Rokhfirooz is currently being held in detention at the Otay Mesa Detention
6 Center and is not able to appear in my office to sign this Verification. I have
7 reviewed the record of his detention and discussed this matter with Rokhfirooz.
8 I verify that the information contained in the foregoing petition is true and
9 correct to the best of my knowledge and belief.

10
11 Dated: August 11, 2025

12
13 By: /s/ Joshua A. Altman
14 Joshua A. Altman

15 Attorney for Petitioner
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