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8 UNITED STATES DISTRICT COURT
9 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

10 Salah Mohsen Ahmed Mohsen,)

11 Plaintiff,)

12 v.)

13 William DeRevere, Warden, Imperial)
14 Regional Detention Facility;)
15 Kristi NOEM, Director, U.S. Department)
16 of Homeland Security; Todd LYONS,)
17 Acting Director, U.S. Immigration)
18 and Customs Enforcement;)
19 and Patrick DIVVER, Field Office Director)
20 of U.S. Immigration and Customs)
21 Enforcement San Diego Field Office)
22 Defendants.)

Case No: '25CV2138 BEN DEB

) PETITION FOR
) WRIT OF HABEAS CORPUS

PRELIMINARY STATEMENT

1. Plaintiff challenges the unreasonable, unlawful, and unconstitutional actions taken by the Defendants in relation to his seizure and re-detention. The Defendants have acted in a manner which violates the Constitution at a minimum, as well as their own policies and regulations regarding the detention of respondents in removal proceedings.
2. Plaintiff has faced a long and arduous journey in his quest to seek asylum in the United States. Plaintiff presented himself at the U.S.-Mexico border with an asylum application in December, 2019, but was made to wait in Mexico for three years under the metering system, while being extorted, robbed, stabbed, threatened and nearly killed. Desperate, the Plaintiff again presented to CBP, who dragged him out of his car, handcuffed and arrested him, tossed his asylum application back in the car, detained, interrogated, threatened and restricted his access to counsel.
3. Following these actions, Plaintiff sought release from detention through a Petition for Habeas Corpus filed in this Court on March 10, 2022 (3:22-cv-00326-BTM-AGS). The Court issued an Order to Show Cause on March 14, 2022. Instead of responding to the OSC, the Defendants issued a humanitarian parole to Plaintiff and released him from detention so that he could apply for

1 asylum during removal proceedings, prompting a voluntary dismissal without
2 prejudice. (See Exhibits B-D, F).

3
4 4. Despite previously seeking to resolve Plaintiff's initial habeas petition with a
5 grant of humanitarian parole, the Defendants have now rescinded Plaintiff's
6 parole unlawfully and re-detained him, not based on the Plaintiff's personal
7 circumstances or individualized facts, but because of the Defendants'
8 interpretation of President Trump's whims and determinations that, Fifth
9 Amendment notwithstanding, noncitizens are not entitled to due process.
10

11
12
13 5. At no point in the history of this case have the Defendants properly applied the
14 law. The Defendants failed to issue a Notice to Appear to the Plaintiff when he
15 was paroled in under humanitarian parole pursuant to 212(d)(5)(A) on March
16 14, 2022 and subsequently issued an Order of Release on Recognizance; failed
17 to properly adjudicate the asylum application, which USCIS acknowledged
18 receiving on January 24, 2022; and failed to properly process the asylum
19 application under the *Al Otro Lado v. Mayorkas* Preliminary Injunction in 17-
20 cv-02366 (S.D.C.A. 2019) as required for the Remain in Mexico applicants,
21 despite the affirmative request of the Plaintiff for them to do so.
22

23
24
25 6. The Defendants, as a matter of law, know that on the true facts, Plaintiff is not
26 subject to detention, his parole was unlawfully revoked, and Plaintiff was not
27 subject to being detained in the manner it was conducted, as he was not a flight
28

1 risk and did not pose a risk of danger to the community, as required by
2 law. The Plaintiff is eligible with an immediately available visa for adjustment
3 of status in the United States pursuant to his inspection and parole on March
4 14, 2022, and remains eligible to have his asylum application adjudicated
5 under 8 U.S.C. § 1158.
6
7

8 7. The Defendants' actions in this case are and were arbitrary, have no basis in
9 the law, and violated the Plaintiff's clear Fifth Amendment rights.
10

11 8. Defendants' actions have harmed and continue to harm Plaintiff as their
12 unlawful actions have caused family separation from his U.S. wife, who is
13 pregnant with the couple's child, and have left the Plaintiff detained without a
14 lawful basis to do so, and without the protections accorded by due process.
15
16

17 9. Plaintiff now seeks review of the unlawful detention of his person in violation
18 of the INA, regulations, and the Fifth Amendments.
19

20 **CUSTODY**

21 10. Plaintiff is in the physical custody of Defendant Patrick Divver, Field Office
22 Director of the San Diego Office of U.S. Immigration & Customs Enforcement
23 ("ICE"), the Department of Homeland Security ("DHS"), and Defendant
24 William DeRevere, Warden of the Imperial Regional Detention Facility in
25 Calexico, California. At the time of filing this Petition, the Plaintiff is detained
26 at the Imperial Regional Detention Facility in Calexico, California. The
27
28

1 Imperial Regional Detention Facility contracts with DHS to detain aliens such
2 as the Plaintiff, and is under the jurisdiction of the ICE San Diego Field Office.
3
4 Plaintiff is under the direct control of Defendants and their agents.
5

6 **JURISDICTION AND VENUE**

- 7 11. This action arises under the Constitution of the United States, the Immigration
8 and Nationality Act ("INA"), 8 U.S.C. § 1101 et seq. This Court has
9 jurisdiction under 28 U.S.C. § 2241, art. I, § 9, cl. 2 of the United States
10 Constitution ("Suspension Clause") and 28 U.S.C. § 1331, as Petitioner is
11 presently in custody under color of authority of the United States and such
12 custody is in violation of the U.S. Constitution, laws, or treaties of the United
13 States. This Court may grant relief pursuant to 28 U.S.C. § 2241, and the All
14 Writs Act, 28 U.S.C. § 1651.
15
16
17 12. Venue lies in the United States District Court for the District of Arizona, under
18 28 U.S.C. § 1391, on the following grounds: 1) Defendants are officers or
19 employees of the United States or agencies in the United States who are sued in
20 their official capacity for their acts under the color of legal authority (28 U.S.C.
21 §1391(e)(1)); 2) acts or omissions giving rise to this petition occurred in this
22 judicial district (28 U.S.C. § 1391(e)(2)); and 3) Plaintiff is detained in this
23 judicial district (28 U.S.C. §1391(e)(3).
24
25
26

27 **PARTIES**

28

- 1 13. Plaintiff Salah Mohsen Ahmed Mohsen (“Plaintiff”) is a national and citizen of
2 Yemen. Plaintiff is detained by Respondent’s *allegedly* pursuant to 8 U.S.C. §
3 1226(a), which permits DHS to detain aliens, such as Plaintiff, pending the
4 alien’s removal proceedings.
5
- 6 14. Defendant William DeRevere (“Defendant DeRevere”) is the warden of the
7 Imperial Regional Detention Facility in Calexico, California. He is Plaintiff’s
8 immediate custodian and is established in the judicial district of the United
9 States District Court for the Southern District of California. He is sued in his
10 official capacity.
11
- 12 15. Defendant Kristi NOEM (“Defendant Noem”) is the Secretary of the
13 Department of Homeland Security (“DHS”), which is responsible for
14 administering and enforcing the nation’s immigration laws pursuant to 8
15 U.S.C. § 1103(a). In this role, she oversees component agencies such as
16 Immigration and Customs Enforcement (ICE). Defendant Noem is sued in her
17 official capacity.
18
- 19 16. Defendant Todd LYONS (“Defendant Lyons”) is the Acting Director of U.S.
20 Immigration and Customs Enforcement (ICE), an agency of the United States
21 and a division of DHS. ICE’s mission includes the enforcement of criminal and
22 civil laws related to immigration. Among other things, ICE is responsible for
23 the stops, arrests and custody of individuals believed to be in violation of civil
24 immigration law. Defendant Lyons is sued in his official capacity.
25
26
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17. Defendant Patrick DIVVER (“Defendant Divver”) is the Field Office Director for the San Diego Field Office of ICE. In that capacity, Defendant Divver is responsible for the supervision of personnel within ICE’s Enforcement and Removal Operations (ERO) in the geographic area covered by the San Diego Field Office, which includes the Imperial Regional Detention Facility. Defendant Divver is sued in his official capacity.

STATEMENT OF FACTS

18. Plaintiff is a native and citizen of Yemen. (See Exhibit A).

19. Plaintiff has resided in the United States pursuant to a grant of humanitarian parole under INA § 212(d)(5)(A) and an Order of Release on Recognizance since March 14, 2022.

20. Plaintiff is the husband of a U.S. Citizen, Zeena Wisam Abdulbari Almsaid, who is currently pregnant with the couple’s child. (See Exhibit T).

21. Plaintiff is the beneficiary of an I-130 Petition for Alien Relative filed on his behalf on July 31, 2025 by his United States citizen wife. As an immediate relative who has been inspected and paroled into the United States, Plaintiff is eligible for adjustment of status under INA § 245(a).

22. Prior to his admission into the United States on parole, the Plaintiff first presented himself at the U.S.-Mexico border with an asylum application in December, 2019, but was made to wait in Mexico for three years under the metering system,

- 1 23. Plaintiff waited in Mexico for three years pursuant to the metering system,
2 during which time he was subjected to extortion, robbery, threats and nearly
3 being killed.
4
- 5 24. Finally, on February 23, 2022, Plaintiff went to the border with his attorney to
6 again seek to get a Form I-131 parole application adjudicated, given that his
7 metering number was current, he had filed his asylum application, and he was
8 severely injured in Mexico.
9
- 10 25. Rather than adjudicate the request, the Defendants at that time detained the
11 Plaintiff, and refused to release him or adjudicate his application for parole.
12
- 13 26. Plaintiff filed a Petition for Writ of Habeas Corpus in the Southern District of
14 California on March 10, 2022, Case No. 3:22-cv-00326-BTM-AGS, alleging
15 violations of Fifth Amendment due process, refusal of access to counsel, and
16 APA violations.
17
- 18 27. On March 14, 2022, the Court issued an Order to Show Cause to the
19 Defendants. (See Exhibit B).
20
- 21 28. Rather than respond to the Order to Show Cause, on March 14, 2022, the
22 Defendants issued a humanitarian parole to the Plaintiff (See Exhibit C) and
23 then subsequently released him from detention with Order of Release on
24 Recognizance (See Exhibit D).
25
- 26 29. Following his release from detention, the Plaintiff voluntarily dismissed his
27 Petition for Writ of Habeas without prejudice (See Exhibit F).
28

- 1 30. In the meantime, on March 1, 2022, USCIS issued an Acknowledgment of
2 Receipt of the Plaintiff's application for asylum (See Exhibit J), and on
3 December 1, 2022, Plaintiff received his Employment Authorization Document
4 ("EAD")(See Exhibit H).
- 5
6 31. On December 15, 2022, USCIS improperly dismissed the asylum application
7 without adjudication, and the Plaintiff immediately requested reopening
8 pursuant to the *Al Otro Lado v. Mayorkas* preliminary injunction.
9
- 10 32. While the request was pending, Plaintiff continued to work and build a life in
11 the United States while waiting to have his asylum application adjudicated or
12 the Notice to Appear issued, as he had been informed would happen. He
13 married his U.S. citizen wife, and the couple are expecting a child. (See
14 Exhibits R, T). He worked hard and purchased his own business, "It's Juicy
15 Burger," and provided jobs to his community. (See Exhibits RR-WW).
16 Plaintiff engaged in a productive, law-abiding life.
17
- 18 33. The Plaintiff has attended regular check-ins with ICE since March 14, 2022.
19 (See Exhibit E). At no time prior to July 21, 2025 was the Plaintiff issued a
20 Notice to Appear or any other documents relating to removal, aside from his
21 release paperwork and humanitarian parole under 212(d)(5)(A).
22
- 23 34. Plaintiff continued to attend regular ICE check-ins without incident, and
24 despite having been granted humanitarian parole and informed he would be
25 receiving a Notice to Appear, he never did.
26
27
28

1 35. On July 21, 2025 at approximately 10:00am, Plaintiff attended his regularly
2 scheduled ICE check-in.

3
4 36. Rather than being issued a new check-in date, Plaintiff was suddenly detained
5 and issued a Notice to Appear, charging removability under INA §
6 212(a)(6)(A)(i), even though the Plaintiff had been inspected and paroled, and
7 therefore was not removable as charged. The detaining officer informed the
8 Plaintiff that his parole had been revoked.

9
10 37. The detaining officer did not give a reason for the revocation of Plaintiff's
11 humanitarian parole.

12
13 38. INA § 212(d)(5)(A) provides that

14
15 "The Secretary of Homeland Security may except as
16 provided in subparagraph (B) or in section 214(f) [8 USCS
17 § 1184(f)], in his discretion parole into the United States
18 temporarily under such conditions as he may prescribe only
19 on a case-by-case basis for urgent humanitarian reasons or
20 significant public benefit any alien applying for admission
21 to the United States, but such parole of such alien shall not
22 be regarded as an admission of the alien *and when the*
23 *purposes of such parole shall, in the opinion of the*
24 *Secretary of Homeland Security, have been served* the alien
25 shall forthwith return or be returned to the custody from
26 which he was paroled and thereafter his case shall continue
27 to be dealt with in the same manner as that of any other
28 applicant for admission to the United States."

8 U.S.C. § 1182(d)(5)(A)(Emphasis added).

26 39. In other words, after humanitarian parole under INA § 212(d)(5)(A) has been
27 granted, the Secretary may only terminate parole "when the purposes of such
28

1 parole shall, in the opinion of the Secretary of Homeland Security, have been
2 served.”

3
4 40. Although the grant of parole itself is a discretionary authority, it has a
5 mandatory requirement—parole may be terminated or revoked only when in
6 the Secretary’s opinion the parole’s purposes have been met.

7
8 41. The purpose of the Plaintiff’s parole into the United States was to safely
9 continue his asylum application, which has not been completed, because of
10 USCIS’s failure to process his request under the *Al Otro Lado* preliminary
11 injunction.

12
13 42. There are mandatory procedures for terminating parole and the Defendants
14 have failed to comply with the requirements imposed by statute or by
15 regulation for terminating parole.

16
17 43. The Supreme Court has stated that under INA § 212(d)(5)(A), immigration
18 officials must “make individualized determinations” of *grants* of parole. See
19 *Jean v. Nelson*, 472 U.S. 846, 857 (1985)).

20
21 44. “Common sense suggests . . . that parole given only on a case-by-case basis is
22 to be terminated only on such a basis.” *Doe v. Noem*, 2025 WL 1505688, at *1
23 (1st Cir. May 5, 2025).

24
25 45. Under the governing regulations, upon written notice, DHS may terminate
26 parole “upon accomplishment of the purpose for which parole was authorized
27 or when in the opinion of one of the officials listed in paragraph (a) of this
28

1 section, neither humanitarian reasons nor public benefit warrants the continued
2 presence of the alien in the United States.” 8 C.F.R. § 212.5(e)(2)(i).

3
4 46. By failing to follow the requirements of either INA § 212(d)(5)(A) or 8 C.F.R.
5 § 212.5(e)(2)(i) in terminating Plaintiff’s parole, and by failing to provide
6 Plaintiff with written notice of the same, Defendants failed entirely to take
7 obligatory procedural steps.

8
9 47. Immigration detention should not be used as a punishment, and should only be
10 used when, under an individualized determination, a noncitizen is a flight risk
11 because they are unlikely to appear for immigration court or a danger to the
12 community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

13
14 48. Upon information and belief, Plaintiff’s detention was related to the policy of
15 the Defendants’ directive to detain 3,000 individuals a day.

16
17 49. As a predictable outcome of the imposition of such quotas, along with the
18 dismantling of oversight mechanisms, the predictable and unfortunate result is
19 that Defendants have engaged in a policy and practice of detaining noncitizens
20 who have been consistently appearing for check-ins without making an
21 individualized flight risk determination as required by law, and revoking parole
22 without the legally required procedures to do so. See, i.e., 8 U.S.C. § 1357; 8
23 U.S.C. § 1182(d)(5)(A).

24
25
26 50. As of today’s date, Plaintiff has not been released from detention.
27
28

1 51. There was not and continues to be no basis in the law for the detention of the
2 Plaintiff, in violation of his Fourth Amendment rights against unlawful seizure
3 and detention.
4

5 **COUNT ONE**
6 **Violation of 8 U.S.C. § 1182(d)(5)(A); 8 C.F.R. § 212.5(e)(2)(i);**
7 **APA Violations**
8 **(Against All Defendants)**

9 52. Plaintiff incorporates paragraphs 1 through 51 as if fully stated herein.

10 53. Defendants illegally detained Plaintiff by unlawfully revoking his parole
11 without cause and without following any lawful procedure to do so.

12 54. Defendants' practices, interpretations of the law, conduct and failure to act
13 violate the APA as the alleged agency action:
14

15 a. has caused "[a] person suffering legal wrong because of agency
16 action, or adversely affected or aggrieved by agency action within the meaning
17 of a relevant statute, is entitled to judicial review therefore." 5 U.S.C. § 702;
18

19 b. has not afforded "all interested parties an opportunity for: (1) the
20 submission and consideration of facts, arguments..." under U.S.C. 554 §
21 (c)(1);
22

23 c. "unlawfully withheld or unreasonably delayed" proper decisions under
24 5 U.S.C. § 706(1);
25

26 d. is "arbitrary, capricious and an abuse of discretion or otherwise not in
27 accordance with law," under 5 U.S.C. § 702(2)(A); and
28

1 e. was “without observance of procedures required by law,” under 5
2 U.S.C. § 706(2)(D).

3
4 55. 8 U.S.C. § 1182(d)(5)(A) and 8 C.F.R. § 212.5(e)(2)(i) require one of two
5 separate findings be made to terminate parole: upon accomplishment of the
6 purpose for which parole was authorized or when in the opinion of one of the
7 officials listed in paragraph (a) of this section, neither humanitarian reasons nor
8 public benefit warrants the continued presence of the alien in the United States.

9
10 56. Defendants have made no such findings as to the Plaintiff.

11
12 57. Defendant’s action of declaring the Plaintiff’s humanitarian parole revoked
13 without making the required findings, and detaining Plaintiff without the
14 required individualized flight risk analysis is “final agency action” that is “in
15 excess of statutory jurisdiction, authority, or limitations” under 8 U.S.C. §
16 1357; 8 U.S.C. § 1182(d)(5)(A); 5 U.S.C. §§704, 706(2)(C).

17
18 58. Defendants’ actions are ultra vires to the requirements of 8 U.S.C. §
19 1182(d)(5)(A) as well as their own regulations regarding parole procedures
20 under 8 C.F.R. § 212.5(e)(2)(i).

21
22 59. The Defendants have already considered Plaintiff’s facts and circumstances
23 and determined that he was not a flight risk or danger to the community in
24 granting humanitarian parole under 212(d)(5)(A). There have been no changes
25 to the facts that justify revocation of Plaintiff’s parole.
26
27
28

1 60. The Defendants actions were *ultra vires* to the controlling statutes and
2 regulations.

3
4 61. The Defendants therefore have violated the APA by taking action that is “not
5 in accordance with the law” as described in 5 U.S.C. § 702(A)(2) and was
6 “without observance of procedures required by law,” under 5 U.S.C. §
7 706(2)(D).
8

9 62. As long as the Defendants’ unlawful detention is permitted to stand, the
10 Plaintiff will continue to suffer physical, emotional and financial harm.
11

12 **COUNT TWO**
13 **Violation of the Fourth Amendment – Unlawful Detention**
14 **As to All Defendants**

15 63. Plaintiff incorporates paragraphs 1 through 62 as if fully stated herein.

16 64. Longstanding U.S. Supreme Court precedent establishes that “[t]he Fourth
17 Amendment applies to all seizures of the person, including seizures that
18 involve only a brief detention short of traditional arrest,” and those performed
19 by immigration officials. *United States v. Brignoni-Ponce*, 422 U.S. 873, 878
20 (1975).
21

22 65. A seizure occurs under the Fourth Amendment "when there is a governmental
23 termination of freedom of movement through means intentionally applied." *See*
24 *Scott v. Harris*, 550 U.S. 372, 381 (2007).
25

26 66. “[T]he Fourth Amendment requires that the seizure be ‘reasonable.’” *Brignoni-*
27 *Ponce*, 422 U.S. at 878. “[T]he reasonableness of such seizures depends on a
28

1 balance between the public interest and the individual's right to personal
2 security free from arbitrary interference by law officers." *Id.*

3
4 67. Defendants have a policy, pattern and practice of revoking parole and detaining
5 noncitizens without following the legal procedures to do so, and without an
6 individualized determination of flight risk, in a manner that violates the Fourth
7 Amendment rights of Plaintiff.
8

9 68. The Defendants have no mechanism for ensuring compliance with the
10 regulatory limits of agents' and officers' detention authority and do not
11 provided guidance to agents and offices on how to engage in procedures that
12 comport with the requirements of the law and Constitution of the United States.
13

14 69. Defendants have made no finding that Plaintiff is a danger to the community.
15

16 70. Defendants have made no finding that Plaintiff is a flight risk because, in fact,
17 he was arrested and detained while appearing at his ICE check-in.
18

19 71. By detaining Plaintiff without cause, Defendants have violated the controlling
20 statutes and regulations, because there have been no changes to the Plaintiffs
21 facts or circumstances since the agency made its initial determination to parole
22 him into the United States that support detention.
23

24 72. By categorically revoking Petitioner's parole and detaining him without
25 consideration of his individualized facts and circumstances, Defendants'
26 actions violated the Fourth Amendment rights of the Plaintiff to be free from
27 unreasonable and unlawful seizure and detention.
28

73. As a result of the Defendants' violations of Plaintiff's Fourth Amendment rights, Plaintiff has suffered, is suffering, and will continue to suffer physical, emotional and financial harm.

COUNT THREE
Violation of Fifth Amendment – Procedural Due Process
As to All Defendants

74. Plaintiff incorporates paragraphs 1 through 76 as if fully stated herein.

75. Non-citizens who are physically present in the United States are guaranteed the protections of the Due Process Clause of the Fifth Amendment. *See Zadvydas v. Davis*, 533 U.S. 678, 693 (2001)("[T]he Due Process Clause applies to all 'persons' within the United States, including aliens, whether their presence here is lawful, unlawful, temporary or permanent.").

76. The Due Process Clause is intended to prevent government officials "from abusing [their] power." *Cnty. of Sacramento v. Lewis*, 523 U.S. 833, 840 (1998)(citations omitted).

77. Due process requires that government action be rational and non-arbitrary. See *U.S. v. Trimble*, 487 F.3d 752, 757 (9th Cir. 2007).

78. "[T]he touchstone of due process is protection of the individual against arbitrary action of government" and "the exercise of power without any reasonable justification in the service of a legitimate governmental objective." *Id.* at 845-46.

- 1 79. Due process also forbids governmental conduct that “shocks the conscience.”
2 *Rochin v. California*, 342 U.S. 165, 172 (1952). Such conduct is “offensive to
3 human dignity.” *Id.* at 174.
4
- 5 80. The unlawful revocation of parole and detention of Plaintiff violates his right to
6 procedural due process protected by the Fifth Amendment, as he has been
7 detained without lawful authority, infringing on his fundamental right to liberty
8 and his Fourth Amendment rights to freedom from unreasonable seizure.
9
- 10 81. The Defendants had no reasonable cause to detain the Plaintiff, who has not
11 been arrested, has not evaded arrest, has not been charged with any criminal
12 activity, and who has been engaged in the lawfully permitted process for the
13 adjudication of his immigration applications.
14
- 15 82. The continued detention of Plaintiff violates his right to due process, as a
16 continuing violation of his right to freedom from abuse of power, and from
17 unreasonable seizure in violation of the law.
18
- 19 83. As a result of the Defendants’ violations of the Plaintiff’s Fourth and Fifth
20 Amendment rights, Plaintiff has suffered, is suffering, and will continue to
21 suffer physical, emotional and financial harm.
22
23

24 PRAYER FOR RELIEF

25 Wherefore, Plaintiff prays that this Court grant the following relief:

- 26 (1) Issue a Writ of Habeas Corpus requiring Defendants to release Plaintiff from
27 ICE custody immediately;
28

1 (2) Declare that Defendants' detention of Plaintiff is unauthorized by statute and
2 contrary to law and the U.S. Constitution.

3
4 (3) If Plaintiffs prevail, they will seek costs under the Equal Access to Justice Act,
5 as amended, 5 U.S.C. § 504 and 28 U.S.C. § 2412. Accordingly, Plaintiffs
6 respectfully request the Court award reasonable costs and attorneys' fees;
7 including, but not limited to, reasonable costs and attorneys' fees available
8 under the Equal Access to Justice Act; and
9

10 (4) Grant any other such relief as this Court may deem just and proper
11

12 Dated: August 11, 2025

Respectfully submitted,

13 s/ Julie A. Goldberg

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21
22
23
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27
28

EVIDENCE LIST

Plaintiff's Biometric Information

Plaintiff Salah Mohsen Ahmed Mohsen's Birth Certificate with English Translation.....A

Evidence of Unlawful Re-Detention without Due Process

Order of the District Judge for CBP to "Show Cause" in Habeas Corpus Proceedings,
Signed March 14, 2022 for Salah Mohsen Ahmed Mohsen.....B
Humanitarian Parole Under 212(d)(5) – Class of Admission "DT".....C
Order of Release on Recognizance, signed by the Respondent on March 15, 2022.....D
ICE Form I-220A – Demonstration of Presence at All Scheduled ICE Check-Ins.....E
Voluntary Dismissal Order Without Prejudice Following Issuance of Parole.....F

Relevant Immigration History

I-130 Receipt Notice, Dated July 31, 2025.....G
Employment Authorization Card.....H
I-765 Receipt Notice.....I
I-589 Acknowledgment of Receipt.....J
I-589 Biometric Appointment Notice.....K
I-589 Improper Administrative Closure, as the Respondent was a Member of
Class Action Lawsuit.....L
I-290B Motion to Reopen I-589 Based on Wrongful Administrative Closure.....M
Al Otro Lado Class Action Notice of Preliminary Injunction Posted by ICE.....N

Additional Available Immigration Relief

Form I-485, Application to Register Permanent Residence or Adjust Status.....O

Family Ties to the United States

Bona Fide Marriage to a U.S. Citizen

U.S. Citizen Spouse, Zeena Wisam Abdulbari Mohsen's U.S. Passport Biometric Page.....P
U.S. Citizen Spouse, Zeena Wisam Abdulbari Mohsen's Certificate of Naturalization.....Q
Marriage Certificate to U.S. Citizen Spouse, Zeena Wisam Abdulbari Mohsen.....R
Respondent's Divorce Decree with English Translation.....S
Doctor's Notice "Blood Test Confirmed the Pregnancy," Dated July 17, 2025.....T
Joint Lease Agreement.....U
Joint Utility Bills.....V
Joint Credit Card.....W
Joint Vehicle Insurance.....X
Wedding Pictures.....Y
Family Pictures Showing Relationship.....Z

Other Family Ties to the United States

U.S. Passport Biographical Page for Cousin, Musaeed A.A. Mashar.....AA
U.S. Passport Biographical Page for Cousin, Muhttm A.A. Mashar.....BB
U.S. Passport Biographical Page for Cousin, Musa A.A. Masaher.....CC
U.S. Passport Biographical Page for Cousin's Child, Y.M.A.A.M.....DD

U.S. Passport Biographical Page for Cousin's Child, M.A.M.....	EE
U.S. Passport Biographical Page for Cousin's Child, Abdullah M.A. Ahmed.....	FF
U.S. Passport Biographical Page for Cousin's Child, A.M.A.....	GG
U.S. Passport Biographical Page for Cousin's Child, M.M.A.A.....	HH
U.S. Passport Biographical Page for Cousin's Ex-Spouse, Nashiya Said.....	II
Lawful Permanent Residence for Cousin's Child, S.M.A.A.....	JJ
Lawful Permanent Residence for Cousin's Child, S.M.A.A.....	KK
Lawful Permanent Residence for Cousin's Child, A.M.A.A.....	LL
Lawful Permanent Residence for Cousin's Child, H.M.A.A.....	MM
Lawful Permanent Residence for Cousin's Child, J.M.A.A.....	NN
Lawful Permanent Residence of Nephew, Mohsen A.M. Ahmed.....	OO
Lawful Permanent Residence for Cousin's Child, Afrah M.M. Obaid.....	PP
Lawful Permanent Residence for Cousin's Spouse, Muna M.A. Alaqwari.....	QQ

Good Moral Character

Business Ownership and Community Job Creation

Registration of "It's Juicy Burger," Registered on March 18, 2024.....	RR
State of California – Seller's Permit for "It's Juicy Burger".....	SS
City of Fresno Business Tax Certificate.....	TT
Commercial Real Estate Lease.....	UU
Good Moral Character Letter from Commercial Real Estate Landlord, Mr. Fahmi Murshed.....	VV
Good Moral Character Letter from Employee, Ms. Maribel Rayford.....	WW

Compliance with Tax Filing Requirements

2024 U.S. Federal Personal and Business Tax Return.....	XX
2023 U.S. Federal Personal Tax Return.....	YY
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AP News Article: "WFP Halts Food Shipments to Houthi-held Parts of Yemen After Rebels Seize Warehouse"	PPP