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10

7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**  
9

10 MERA V BUSKILA EDIRI

Case No.: 25-cv-9305

11 Petitioner,

12 v.

13 KRISTI NOEM SCRETARY OF  
14 HOMELAND SECURITY ; HEAD OF  
15 ERO-ICE LOS ANGELES,  
16 CALIFORNIA; WARDEN  
17 ADELANTO ICE DETENTION  
18 FACILITY CALIFORNIA, ET AL.

19 Respondents.

20 **EMERGENCY PETITION FOR**  
21 **WRIT OF HABEAS CORPUS TO**  
22 **RELEASE INS DETAINEE UNDER**  
23 **28 USC § 2241; DECLARATION OF**  
24 **ARMAND AVAZIAN**

25 **IN CUSTODY:**  
26 **A#203-049-907 (Alien Registration**  
27 **Number)**

28 COMES NOW THE PETITIONER, MERA V BUSKILA EDIRI, by and through  
1 her counsel, Armand Avazian, move for immediate release from Immigration Custom  
2 Enforcement (“ICE”) custody where she is presently being detained. ICE is detaining  
3 the Petitioner in its own facility, as detailed below, and as such, the warden holding her  
4 in custody is the Supervisory ICE officer responsible for the facility, under the direction  
5 of the Field Office Director of the Enforcement and Removal Operations (“ERO”)  
6 division of ICE.

7 Petitioner, Merav Buskila Ederi (“Petitioner”), is a 52 year-old citizen of Israel,  
8 is currently detained at the ICE ERO OFFICE located 300 N. Los Angeles St., Room  
9 B-18, Los Angeles, CA 90012. The Petitioner has been detained since September 29,  
10 2025, when she appeared this morning to ostensibly provide ICE with an update of her  
11  
12

1 current status. See EXHIBIT 1 (ICE Letter). She rightfully believed that she was  
2 appearing as she had many times before to “check in” and review her status with the  
3 ICE officer. The ICE letter indicates that the reason for the appointment was “Case  
4 Review with USCIS – Case updates and address confirmation”, and the email from the  
5 ICE officer indicates he is part of the non-detained unit. See EXHIBIT 2 (Emails  
6 between ICE office and Petitioner’s immigration counsel).

7 Petitioner is an Orthodox Jew who practices biblical traditional Judaism. This  
8 Wednesday, October 1, 2025, at sunset is the start of the Yom Kippur holiday. It is the  
9 holiest day of the year for practicing Jews who fast from sunset October 1, until the  
10 evening of October 2. During this time, members of the Faith are required to pray the  
11 evening of Yom Kippur (October 1), and all day October 2, in the Synagogue, as well  
12 as performing various religious rites and rituals. See EXHIBIT 3 (Rabbi’s Letter).  
13 Because of this, the Petitioner strongly avers that her detention is unlawful as it violates  
14 her constitutional rights to freedom of religion without any basis for the government to  
15 detain her. As noted below, for over 30 years, the government did not take persons  
16 similarly situated as the Petitioner into custody once they were in the process of  
17 adjusting status to permanent residency. See EXHIBIT 4 (Declaration of Petitioner’s  
18 Immigration Attorney, Erika Roman) Furthermore, even if one had been taken into  
19 custody ICE would issue a bond without requiring the individual to seek one from the  
20 Immigration Judge (“IJ”). This petition seeks relief under 28 U.S.C. § 2241, asserting  
21 that Petitioner’s continued detention violates the U.S. Constitution, the Immigration and  
22 Nationality Act (INA), and applicable regulations such as 8 USC § 1226 also known as  
23 section 36 of the Immigration and Nationality Act (INA), which provides for a bond.

24 **JURISDICTION**

25 2. This action arises under the Constitution of the United States, the Immigration  
26 and Nationality Act (“INA”), 8 U.S.C. § 1101 et. seq., as amended by the Illegal  
27 Immigration Reform and Immigrant Responsibility Act of 1996 (“IIRIRA”), Pub. L.  
28 No. 104-208, 110 Stat. 1570. This Court has jurisdiction under 28 U.S.C. 2241, art. I,

1 § 9, cl. 2 of the United States Constitution (“Suspension Clause”) and 28 U.S.C. § 1331,  
2 as Petitioner is presently in custody under color of authority of the United States and  
3 such custody is in violation of the U.S. Constitution, laws, or treaties of the United  
4 States. This Court may grant relief pursuant to 28 U.S.C. § 2241, and the All Writs Act,  
5 28 U.S.C. § 1651.

## VENUE

7       3. Venue lies in the United States District Court for the Central District Of  
8 California, the judicial district in which the Petitioners are being held at 300 N. Los  
9 Angeles St., Room B-18, Los Angeles, CA 90012 in California. 28 U.S.C. § 1391(e).

## STATEMENT OF FACTS

12 Petitioner lawfully entered the United States on a non-immigrant visa and sought  
13 permanent residency based on a previous marriage to a United States citizen. The  
14 petition was denied and Petitioner appealed the denial, and ultimately, filed an action in  
15 United States District Court in Los Angeles, under the Administrative Procedure Act,  
16 (APA). Her complaint was dismissed, and she appealed to the U.S. 9<sup>th</sup> Circuit Court of  
17 Appeals which upheld the district court decision. After the 9<sup>th</sup> Circuit issued its  
18 mandate, the Petitioner appeared on a yearly basis at the Immigration Customs and  
19 Enforcement (ICE) office having jurisdiction over her to update her status and was not  
20 taken into custody. No Notice to Appear (“NTA”) was ever issued to the Petitioner  
21 which initiates a removal proceeding in front of the IJ. Consequently, there is no order  
22 of removal for the Petitioner. Petitioner has no criminal record, has two United States  
23 citizen son and daughter.

24 In the beginning of September of this year, the Petitioner became statutorily  
25 eligible for permanent residency through her U.S. citizen daughter who filed on her  
26 behalf an I-130 petition to classify her as an immediate relative of a U.S. citizen ("IR").  
27 Concurrently with the I-130 petition, the Petitioner filed form I-485 (application to  
28 adjust status to that of a permanent resident). Attached hereto are the receipts of the

1 filing accepted by the United States Citizenship and Immigration Service (USCIS)  
2 evidencing a pending application for permanent residency. See EXHIBIT 5 (USCIS  
3 Receipts). On September 28, 2025, at 8:00 a.m., the petitioner appeared at the ICE  
4 substation in Camarillo, CA pursuant to a letter she received to appear in person “to  
5 update her service record”. Prior to appearing, petitioner’s counsel, sent the ICE officer  
6 in charge of her case, the entire adjustment of status application for permanent residency  
7 based on her United States Citizen (USC) daughter’s petition for her together with the  
8 receipts showing the applications have been received by USCIS and her application is  
9 in process with USCIS.

10 Notwithstanding the fact that for the last 30 years applicants for Adjustment of  
11 Status who have never been in immigration court proceedings, and have never  
12 committed any crimes, and have never failed to appear when requested to do so, and  
13 have a lawful entry, are not taken into custody by ICE, the Petitioner was in fact taken  
14 into custody. This custodial action by ICE taking the petitioner into custody is a  
15 deviation of this practice which has been in existence for over thirty years. Pursuant to  
16 Loper Bright Enterprises v. Raimondo, 603 U.S. 369 (2024) which states “the  
17 longstanding practice of the government informs a court of what the law is”. This  
18 practice of not taking applicants who are presently in adjustment of status proceedings  
19 (AOS) and statutorily eligible for AOS are not taken into custody has been the  
20 Immigration policy for over thirty years.

21 Another factor to consider for the Habeas Petition is that the petitioner sought in  
22 the alternative a bond or parole from ICE under 8 USC § 1226 (Section 236 of the INA)  
23 which statutorily gives the petitioner the right to receive a bond. Despite the lawful  
24 request of a bond from ICE, the officer handling her case refused and stated that she  
25 would need to go in front of an immigration judge after he filed the NTA with the EOIR  
26 Immigration Court. He could not even give a time when this would happen, nor could  
27 he even say which court it would be filed with. See EXHIBIT 2 (Emails between ICE  
28 and Petitioner’s immigration counsel). ICE officers have routinely granted bond in

1 these types of cases with these set of facts and circumstances. Typically in these  
2 matters, a bond of \$1500 would be required. If the court finds it necessary, petitioner  
3 can post such a bond for \$1500, whatever bond this court finds appropriate. Petitioner  
4 is not a flight or security risk. She is on the doorstep of becoming a permanent resident  
5 and has retained counsel to complete the process.

6 Because the holiday of Yom Kippur begins on Wednesday October 1, 2025 at  
7 sundown and it is the holiest day for members of the Jewish faith, of which the Petitioner  
8 is a member, this Petition for Habeas is being filed on an EMERGENCY BASIS. The  
9 petitioner is a fully practicing member of the Jewish faith who would be deprived of her  
10 ability to practice her religion and her freedom of religion if she were to remain in  
11 custody during this time.

12 **PRAYER FOR RELIEF**

13 Petitioner respectfully requests that this Court:

14 1. Assume jurisdiction over this matter;  
15 2. Issue an Order to Show Cause;  
16 3. Declare Petitioner's detention unlawful;  
17 4. Issue a Writ of Habeas Corpus ordering Petitioner's release or a bond hearing;  
18 5. Grant any other relief deemed just and proper.

19  
20 Based upon the foregoing, it is respectfully requested that the Court enter an order  
21 releasing Plaintiff from custody.

22  
23 Dated: September 29, 2025

Respectfully Submitted,



24  
25 ARMAND AVAZIAN  
26 Attorney for Petitioner  
27  
28

1 Armand Avazian, Esq (213845)  
2 Avazian & Avazian  
3 707 Wilshire Blvd., Suite 3800  
4 Los Angeles, CA 90017  
5 Telephone: (213) 624-1793  
Facsimile: (213) 891-2890  
Email: armandavazian@avazianlaw.com

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7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10

11 MERA V BUSKILA EDIRI

12 Petitioner,

13 v.

14 KRISTI NOEM, DHS, et al.,

15 Respondents.

Case No.: 25-cv-9305

16

17 I, ARMAND AVAZIAN, hereby declare and say as follows:

18 1. I am an attorney licensed to practice law in the State of California and admitted to  
19 practice before the Superior Court of California.

20 2. I have personal knowledge of the matters set forth below and, if called upon to do so,  
21 could and would competently testify to the matters set forth herein in a court of law.

22 3. Ms. Ederi was taken into custody this morning on September 29, 2025 and kept at the  
23 Camarillo, CA immigration detention facility until the afternoon when she was transported to  
24 USCIS 300 N.. Los Angeles St., Room B-18, Los Angeles, CA.

25 4. By the time counsel was retained it was not possible to travel to Camarillo to have Ms.  
26 Ederi sign the petition. Additionally, I did not learn of her transfer to Los Angeles until 4:00  
27 p.m. in the afternoon. Room B-18 closes at 4:30 p.m. and would have been impossible for me  
28 get to that facility for Ms. Ederi to sign the petition.

- 1 5. Ms. Ederi is aware that a Habeas Petition is being filed on her behalf and consents to it's
- 2 filing. Ms. Ederi is not available to sign the petition.
- 3 6. I have personally spoken to her immigration attorney Erika Roma who explained her
- 4 immigration history and provided the relevant immigration documents which are
- 5 attached as exhibits to the Petition.
- 6 7. As result of a later filing after hours, no Judge or U.S. Attorney has been assigned. No
- 7 notice can be given to the U.S. Attorney as one has not been assigned and it is after
- 8 business hours.
- 9 8. Petitioner will likely be transferred out of Los Angeles, CA and it is uncertain if she will
- 10 remain in the State of California or transferred to another State. This will create
- 11 substantial physical, emotional and financial hardship for her family who could not
- 12 readily visit or support her.

13  
14 I declare under penalty of perjury under the laws of the State of California that the  
15 foregoing is true and correct and that if called upon to testify with respect thereto I could do so  
16 competently.  
17

18 Executed this 29<sup>th</sup> day of September, 2025, in Los Angeles, California.

19  

20 ARMAND AVAZIAN, ESQ.  
21  
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27  
28

# EXHIBIT 1



**BUISKILA EDERI, Merav**

A-File Number: 

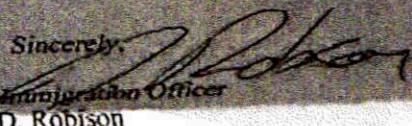
Date: August 23, 2025

Please come to the office shown below at the time and place indicated in connection with an official matter.

OFFICE LOCATION	321 Cortez Circle, Camarillo, CA 93012
DATE AND HOUR	September 16, 2025, at 08:00 am
ASK FOR	Case Officer
REASON FOR APPOINTMENT	Case Review with USCIS – Case updates and address confirmation.
BRING WITH YOU	Proper identification and any identification from your country of origin such as a passport, immigration documents, USCIS applications, etc.

IT IS IMPORTANT THAT YOU KEEP THIS APPOINTMENT AND BRING THIS LETTER WITH YOU.

NOTE: Failure to comply with the conditions of this order may result in the revocation of your release and further enforcement actions.

Sincerely,  
  
D. Robison

# EXHIBIT 2

## Armand Avazian

---

**From:** Erika Roman <erika@elrlawgroup.com> on behalf of Erika Roman  
**Sent:** Monday, September 29, 2025 3:10 PM  
**To:** Armand Avazian  
**Subject:** BUSKILA EDEREI, MERA - A [REDACTED] Request for bond or parole

**From:** Robison, Drake A <Drake.A.Robison@ice.dhs.gov>  
**Sent:** Monday, September 29, 2025 1:49 PM  
**To:** Erika Roman <erika@elrlawgroup.com>  
**Subject:** RE: BUSKILA EDEREI, MERA - A [REDACTED] Request for bond or parole

Hello,

I will send you a copy of the NTA when feasible. Keep in mind, her EOIR and detention facility are unknown at this time, so the date, time, and location are TBD while her case is processing. Her NTA reflects the same and she will be served a new NTA from her detained officer. I do not know where she is going at this point.

At this point I would monitor the <https://locator.ice.gov/>, to see where she is sent to and use that to direct any future correspondence. My facility is a processing facility and your client has departed already. She is no longer in my custody or under my case docket, therefor I cannot accept any correspondence or actions on your clients behalf.

Respectfully,

D. Robison

Sent with BlackBerry Work  
([www.blackberry.com](http://www.blackberry.com))

---

**From:** Erika Roman <erika@elrlawgroup.com>  
**Date:** Monday, Sep 29, 2025 at 1:28 PM  
**To:** Robison, Drake A <[drake.a.robison@ice.dhs.gov](mailto:drake.a.robison@ice.dhs.gov)>  
**Cc:** reception@elrlawgroup <[reception@elrlawgroup.com](mailto:reception@elrlawgroup.com)>, Natali Lopez <[natali@elrlawgroup.com](mailto:natali@elrlawgroup.com)>, Ivone Garcia <[ivone@elrlawgroup.com](mailto:ivone@elrlawgroup.com)>  
**Subject:** BUSKILA EDEREI, MERA - A#203 049 907- Request for bond or parole

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We are in the process of creating a bond parole package for ERO/ICE, and ankle bracelet is acceptable.

As you may know, Ms. Ederi has a pending adjustment before USCIS and has no criminal history and significant family ties.

Please advise where I may send the package to – for consideration.

Thank you.

Regards, Erika Roman-Maury

**Armand Avazian**

---

**From:** Erika Roman <erika@elrlawgroup.com> on behalf of Erika Roman  
**Sent:** Monday, September 29, 2025 2:57 PM  
**To:** armandavazian@avazianlaw.com  
**Subject:** BUSKILA EDEREI, MERA - A [REDACTED] lets discuss  
**Attachments:** [REDACTED] G56.pdf

**From:** Robison, Drake A <[Drake.A.Robison@ice.dhs.gov](mailto:Drake.A.Robison@ice.dhs.gov)>  
**Sent:** Tuesday, September 16, 2025 11:47 AM  
**To:** Erika Roman <[erika@elrlawgroup.com](mailto:erika@elrlawgroup.com)>  
**Subject:** BUSKILA EDEREI, MERA - A [REDACTED]

Good morning, Counsel,

I have received your client's medical paperwork and G28 on your behalf via FedEx. BUSKILA EDEREI, MERA's new report date and time is now set for **Monday, September 29, 2025, at 0800AM hours**. The address and information is on her G56. She is expected to be present for this appointment.

A copy of the corresponding G56 is attached to this email for you and your client's review. A physical copy will also be mailed to your client's address of residence. Thank you.

*D. Robison*  
Non-Detained Unit  
Immigration and Customs Enforcement |  
Los Angeles Field Office | Ventura Sub-office  
Office: 321 Cortez Circle,  
Camarillo, CA 93012

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**Armand Avazian**

---

**From:** Erika Roman <erika@elrlawgroup.com> on behalf of Erika Roman  
**Sent:** Monday, September 29, 2025 2:55 PM  
**To:** armandavazian@avazianlaw.com  
**Subject:** FW: ICE APPT 9/29 BUSKILA EDEREI, MERA  
V - A#   
  
**Importance:** High

**From:** "Robison, Drake A" <[Drake.A.Robison@ice.dhs.gov](mailto:Drake.A.Robison@ice.dhs.gov)>  
**Date:** September 16, 2025 at 12:13:57 PM PDT  
**To:** Erika Roman <[erika@elrlawgroup.com](mailto:erika@elrlawgroup.com)>  
**Cc:** "Kirksey, Darius J" <[darius.j.kirksey@ice.dhs.gov](mailto:darius.j.kirksey@ice.dhs.gov)>  
**Subject:** RE: BUSKILA EDEREI, MERA  
V - A# 

Hello, Counsel,

Your client tested positive on or about 09/11/2025. Per CDC and federal guidance, isolation lasts 5 days, with most agencies using up to 10 days out of caution. By 09/29/2025, more than two weeks will have passed (nearly 18 days), which is more than sufficient time for recovery and safe reporting. She is required to appear on the aforementioned date. Thank you.

Respectfully,

*D. Robison*

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Los Angeles Field Office | Ventura Sub-office  
Office: 321 Cortez Circle,  
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**From:** Erika Roman <[erika@elrlawgroup.com](mailto:erika@elrlawgroup.com)>  
**Sent:** Tuesday, September 16, 2025 12:01 PM  
**To:** Robison, Drake A <[Drake.A.Robison@ice.dhs.gov](mailto:Drake.A.Robison@ice.dhs.gov)>  
**Cc:** reception@elrlawgroup <[reception@elrlawgroup.com](mailto:reception@elrlawgroup.com)>; Natali Lopez <[natali@elrlawgroup.com](mailto:natali@elrlawgroup.com)>  
**Subject:** RE: BUSKILA EDEREI, MERA  
V - A# 

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Good morning,

She is still pretty ill. Not sure if she will be ok to travel by the 29<sup>th</sup>. Apparently per the doctor, she is still contagious.

That being said, in the meantime, I can email you the adjustment paperwork sent to USCIS – her USC daughter has petitioned her for I-130 and I-485, complete adjustment. Also, as you likely know, Merav entered lawfully so she has a legal entry and can have a straightforward adjustment before USCIS.

Thank you.

Will be in touch,

Erika Roman-Maury, Attorney

**From:** Robison, Drake A <[Drake.A.Robison@ice.dhs.gov](mailto:Drake.A.Robison@ice.dhs.gov)>

**Sent:** Tuesday, September 16, 2025 11:47 AM

**To:** Erika Roman <[erika@elrlawgroup.com](mailto:erika@elrlawgroup.com)>

**Subject:** BUSKILA EDEREI, MERA - A 

Good morning, Counsel,

I have received your client's medical paperwork and G28 on your behalf via FedEx. BUSKILA EDEREI, MERA's new report date and time is now set for **Monday, September 29, 2025, at 0800AM hours**. The address and information is on her G56. She is expected to be present for this appointment.

A copy of the corresponding G56 is attached to this email for you and your client's review. A physical copy will also be mailed to your client's address of residence. Thank you.

*D. Robison*

Non-Detained Unit

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**Armand Avazian**

---

**From:** Erika Roman <erika@elrlawgroup.com> on behalf of Erika Roman  
**Sent:** Monday, September 29, 2025 2:55 PM  
**To:** armandavazian@avazianlaw.com  
**Subject:** FW: BUSKILA EDEREI, MERAVER A# 

**From:** Erika Roman  
**Sent:** Tuesday, September 16, 2025 12:01 PM  
**To:** 'Robison, Drake A' <[Drake.A.Robison@ice.dhs.gov](mailto:Drake.A.Robison@ice.dhs.gov)>  
**Cc:** reception@elrlawgroup <[reception@elrlawgroup.com](mailto:reception@elrlawgroup.com)>; Natali Lopez <[natali@elrlawgroup.com](mailto:natali@elrlawgroup.com)>  
**Subject:** RE: BUSKILA EDEREI, MERAVER A# 

Good morning,

She is still pretty ill. Not sure if she will be ok to travel by the 29<sup>th</sup>. Apparently per the doctor, she is still contagious.

That being said, in the meantime, I can email you the adjustment paperwork sent to USCIS – her USC daughter has petitioned her for I-130 and I-485, complete adjustment. Also, as you likely know, Merav entered lawfully so she has a legal entry and can have a straightforward adjustment before USCIS.

Thank you.  
Will be in touch,  
Erika Roman-Maury, Attorney

**From:** Robison, Drake A <[Drake.A.Robison@ice.dhs.gov](mailto:Drake.A.Robison@ice.dhs.gov)>  
**Sent:** Tuesday, September 16, 2025 11:47 AM  
**To:** Erika Roman <[erika@elrlawgroup.com](mailto:erika@elrlawgroup.com)>  
**Subject:** BUSKILA EDEREI, MERAVER A# 

Good morning, Counsel,

I have received your client's medical paperwork and G28 on your behalf via FedEx. BUSKILA EDEREI, MERAVER's new report date and time is now set for Monday, September 29, 2025, at 0800AM hours. The address and information is on her G56. She is expected to be present for this appointment.

A copy of the corresponding G56 is attached to this email for you and your client's review. A physical copy will also be mailed to your client's address of residence. Thank you.

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Office: 321 Cortez Circle,  
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**Armand Avazian**

---

**From:** Erika Roman <erika@elrlawgroup.com> on behalf of Erika Roman  
**Sent:** Monday, September 29, 2025 2:55 PM  
**To:** armandavazian@avazianlaw.com  
**Subject:** FW: Follow up re: BUSKILA EDEREI, MERA - A# 

**From:** Erika Roman <erika@elrlawgroup.com>  
**Sent:** Sunday, September 28, 2025 2:57 PM  
**To:** Robison, Drake A <Drake.A.Robison@ice.dhs.gov>  
**Subject:** Follow up re: BUSKILA EDEREI, MERA - A#   
**Importance:** High

**CAUTION:** This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

Good afternoon,

I completely understand what you are saying and my intention and goal is to always comply with the law and advise my clients to do so as well. If I may advise, I am not retained for matters involving ERO/ICE. I was retained to represent Ms. Ederi before USCIS with regard to the adjustment that her USC daughter filed on behalf of her. **Please see receipts attached to this email.** The adjustment is currently pending before USCIS.

Ms. Ederi has straightforward direct and fast relief as she entered lawfully and can adjust her status to a lawful permanent resident before USCIS. The visa is immediately available.

I was simply going to accompany her as a courtesy and frankly I am not sure why a couple hours makes a difference as a professional courtesy to me when I have a mandatory appearance before Immigration Judge Ruane for alien number 

That being said, I have not been provided with any information as to the purpose of this meeting. Is it to present her with a Notice to appear?

As I stated earlier, I have not had contact with her yet but I will pass any and all information along.

Thank you.

**From:** Robison, Drake A <Drake.A.Robison@ice.dhs.gov>  
**Sent:** Sunday, September 28, 2025 10:28 AM  
**To:** Erika Roman <erika@elrlawgroup.com>  
**Subject:** RE: Second request for information re: attp: BUSKILA EDEREI, MERA - A# 

Hello,

Please note that the reporting requirement is directed to your client, not to counsel. Whether or not you are available on the scheduled date does not change your clients obligation to appear as directed. If your client fails to report, she will be classified as absconding, her case may be classified as fugitive status, and any enforcement efforts may be escalated.

In addition to the G56's that were sent to you to relay to your client, I also sent out corresponding G56's via USPS, to her verified home address. As per normal policies, this has been documented and any failure to comply may impact your clients case and future immigration benefits.

Thank you, and have a great weekend.

Sent with BlackBerry Work  
([www.blackberry.com](http://www.blackberry.com))

**Armand Avazian**

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**From:** Erika Roman <erika@elrlawgroup.com> on behalf of Erika Roman  
**Sent:** Monday, September 29, 2025 2:53 PM  
**To:** armandavazian@avazianlaw.com  
**Subject:** FW: BUSKILA EDEREI, MERA - A [REDACTED] Request for bond or parole  
**Importance:** High

**From:** Erika Roman  
**Sent:** Monday, September 29, 2025 1:29 PM  
**To:** Robison, Drake A <drake.a.robison@ice.dhs.gov>  
**Cc:** reception@elrlawgroup <reception@elrlawgroup.com>; Natali Lopez <natali@elrlawgroup.com>; Ivone Garcia <ivone@elrlawgroup.com>  
**Subject:** BUSKILA EDEREI, MERA - A [REDACTED] Request for bond or parole  
**Importance:** High

We are in the process of creating a bond parole package for ERO/ICE, and ankle bracelet is acceptable.

As you may know, Ms. Ederi has a pending adjustment before USCIS and has no criminal history and significant family ties.

Please advise where I may send the package to – for consideration.

Thank you.

Regards, Erika Roman-Maury

**Armand Avazian**

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**From:** Erika Roman <erika@elrlawgroup.com> on behalf of Erika Roman  
**Sent:** Monday, September 29, 2025 2:53 PM  
**To:** armandavazian@avazianlaw.com  
**Subject:** FW: BUSKILA EDEREI, MERA - A [REDACTED] Request for bond or parole

**From:** Robison, Drake A <[Drake.A.Robison@ice.dhs.gov](mailto:Drake.A.Robison@ice.dhs.gov)>  
**Sent:** Monday, September 29, 2025 1:49 PM  
**To:** Erika Roman <[erika@elrlawgroup.com](mailto:erika@elrlawgroup.com)>  
**Subject:** RE: BUSKILA EDEREI, MERA - A [REDACTED] Request for bond or parole

Hello,

I will send you a copy of the NTA when feasible. Keep in mind, her EOIR and detention facility are unknown at this time, so the date, time, and location are TBD while her case is processing. Her NTA reflects the same and she will be served a new NTA from her detained officer. I do not know where she is going at this point.

At this point I would monitor the <https://locator.ice.gov/>, to see where she is sent to and use that to direct any future correspondence. My facility is a processing facility and your client has departed already. She is no longer in my custody or under my case docket, therefor I cannot accept any correspondence or actions on your clients behalf.

Respectfully,

D. Robison

Sent with BlackBerry Work  
([www.blackberry.com](http://www.blackberry.com))

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**From:** Erika Roman <[erika@elrlawgroup.com](mailto:erika@elrlawgroup.com)>  
**Date:** Monday, Sep 29, 2025 at 1:28 PM  
**To:** Robison, Drake A <[drake.a.robison@ice.dhs.gov](mailto:drake.a.robison@ice.dhs.gov)>  
**Cc:** reception@elrlawgroup <[reception@elrlawgroup.com](mailto:reception@elrlawgroup.com)>, Natali Lopez <[natali@elrlawgroup.com](mailto:natali@elrlawgroup.com)>, Ivone Garcia <[ivone@elrlawgroup.com](mailto:ivone@elrlawgroup.com)>  
**Subject:** BUSKILA EDEREI, MERA - A [REDACTED] Request for bond or parole

**CAUTION:** This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click [here](#) and follow instructions.

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Please advise where I may send the package to – for consideration.

Thank you.

Regards, Erika Roman-Maury

# EXHIBIT 3

DECLARATION OF RABBI MOSHE SHOLUM

I, MOSHE SHOLUM, declare as follows:

1. I am the Head Rabbi for the Sephardic Section of our Synagogue, and I conduct the services for the synagogue and explain and lecture the biblical precepts followed in our services.
2. Merav Buskila Ederi is an active member of my Synagogue (Sephardic section). She is a practitioner of the Orthodox Jewish faith, and is mandated to fast on Yom Kippur, and pray the entire day of the Holiday and perform various religious rituals and rites. We believe that one's soul is brought before the Lord on Yom Kippur and the Holy One may he be Blessed determines the fate of each individual on that day. For this reason, strict religious compliance is adhered to fully.
3. On Wednesday October 1, 2025 at sundown is the holiday of Yom Kippur, the holiest day for members of Jewish faith which mandates fasting from sunset October 1st until evening of October 2nd. Additionally, there are continuous prayer services the evening of October 1<sup>st</sup> as well as continuous prayer services and religious rites from the morning of October 2<sup>nd</sup> until the evening of October 2<sup>nd</sup>, until the "Shofar" (Traditional Ram's Horn) is sounded in the Synagogue.
4. Ms. Ederi would be deprived of her ability to practice her religion and her freedom of religion if she were to remain in custody during this time. It would be impossible for her to properly fast, pray, and engage in the numerous religious rituals and rites mandated by the Bible, as commanded by the Holy One, the Creator of the Universe.
5. Unfortunately, our community has experienced a rise in antisemitism which is affecting our congregants, for the past year. A community-wide prayer session in our services is directed to this unfortunate situation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
MOSHE SHOLUM

Date

9.29.25



# EXHIBIT 4

1 Law Office of Erika Roman-Maury  
2 Erika Roman, CSB 216323  
3 14654 Victory Blvd #110  
4 Van Nuys, California 91411  
5 Telephone: (818) 385-1100  
6 Facsimile: (818) 385-1041  
7 Email: erika@elrlawgroup.com

8  
9  
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA,**

11 **COUNTY OF LOS ANGELES**

12 MERA V BUSKILA EDIRI

13 Case No.: 25-cv-9305

14 Petitioner,

15 V.  
16 **DECLARATION OF ERIKA ROMAN,**  
17 **ESQ.**

18 KRISTI NOEM, DHS, et al.,

19 Respondents.

20 I, Erika Roman, hereby declare and say as follows:

21 1. I am an attorney licensed to practice law in the State of California and admitted to  
22 practice before the Superior Court of California and the U.S Court of Appeals 9<sup>th</sup> Circuit since  
23 2001.

24 2. I have practiced extensively representing immigrants before the Executive Office for  
25 Immigration Review, which constitutes the trial-level immigration courts, the Board of  
26 Immigration Appeals and the Ninth Circuit Court of Appeals.

27 3. I have been invited to speak at seminars on the intersection of immigration law and  
28 criminal law and I sit on the Committee as a Liaison for the American Immigration Lawyer's  
Association for the Executive Office for Immigration Review to evaluate subjects such as the  
criminal defense of immigrants and practicing before the immigration courts in removal, bond

1 and videoconference proceedings. I am a member of the Los Angeles County Bar  
2 Association's Immigration and Nationality Law Section since 2010.

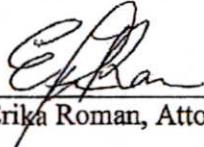
3 4. I have personal knowledge of the matters set forth below and, if called upon to do so,  
4 could and would competently testify to the matters set forth herein in a court of law.

5 5. It has been my been experience that petitioners such as Ms. Ederi have not been subject  
6 to detention. She entered the United States lawfully on a visa, has committed no criminal  
7 violations of the law, has complied with all requests from the Department of Homeland  
8 Security and has been pursuing lawful immigration status, diligently and is near attaining such  
9 relief. Up until recently, individuals such as Ms. Ederi have not been placed on alternatives to  
10 detention, much less an ankle bracelet, but they have merely been asked to check in so that the  
11 the Department can ensure that the lawful avenue for relief is being pursued.

12 6. I reached out to the Department of Homeland Security's deportation officer and  
13 explained to him that a family visa petition is pending and was submitted for her at the  
14 Department's sister agency, United States Citizenship and Immigration Services (USCIS), and  
15 provided him a conformed copy of the visa petition, and all supporting documentation,  
16 including the receipts. I believe that adjudication will be perfunctory, and she is immediately  
17 eligible to receive a visa. Again, individuals in the petitioner's shoes have never been taken  
18 into custody under these circumstances. Once she was taken into custody, I implored the  
19 officer to consider release on bond or parole but was met with silence.  
20

21 I declare under penalty of perjury under the laws of the State of California that the  
22 foregoing is true and correct and that if called upon to testify with respect thereto I could do so  
23 competently.

24 Executed this 29<sup>th</sup> day of September, 2025, in Los Angeles, California.

25  
26   
27 

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Erika Roman, Attorney  
28

# EXHIBIT 5

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

<b>NOTICE TYPE</b> Receipt		<b>NOTICE DATE</b> September 18, 2025	
<b>CASE TYPE</b> I-130, Petition for Alien Relative		<b>USCIS ALIEN NUMBER</b>	
RECEIPT NUMBER 	RECEIVED DATE September 17, 2025	PAGE 1 of 1	DATE OF PETITION  2004
PRIORITY DATE September 17, 2025	PREFERENCE CLASSIFICATION 201 B INA PARENT OF USC	<b>PAYMENT INFORMATION:</b>	
MAI EDERI C/O ERIKA ROMAN-MAURY ELR LAW GROUP 20058 VENTURA BLVD STE 137 WOODLAND HILLS, CA 91364		Application/Petition Fee: \$675.00	Total Amount Received: \$675.00
		Total Balance Due: \$0.00	



**APPLICANT/PETITIONER NAME AND MAILING ADDRESS**

We have received your form and are currently processing the above case for the following beneficiaries:

Name  
BUSKILA EDERI, MERRAV

Date of Birth  


Country of Birth  
ISRAEL

Class (If Applicable)

If this notice contains a priority date, this priority does not reflect earlier retained priority dates. We will notify you separately about any other case you filed.

If we determine you must submit biometrics, we will mail you a biometrics appointment notice with the time and place of your appointment.

If you have questions or need to update your personal information listed above, please visit the USCIS Contact Center webpage at [uscis.gov/contactcenter](http://uscis.gov/contactcenter) to connect with a live USCIS representative in English or Spanish.

**USCIS Office Address:**

USCIS  
National Benefits Center  
P.O. Box 648003  
Lee's Summit, MO 64002

**USCIS Contact Center Number:**

(800)375-5283  
ATTORNEY COPY



Department of Homeland Security  
U.S. Citizenship and Immigration Services

Form I-797C, Notice of Action

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

NOTICE TYPE Receipt	NOTICE DATE September 18, 2025
CASE TYPE I-485, Application to Register Permanent Residence or Adjust Status	USCIS ALIEN NUMBER A [REDACTED]
RECEIVED DATE September 17, 2025	PAGE 1 of 1
PRIORITY DATE September 17, 2025	DATE OF BIRTH [REDACTED]

MERAV BUSKILA EDERI  
C/O ERIKA ROMAN-MAURY ELR LAW GROUP  
20058 VENTURA BLVD STE 137  
WOODLAND HILLS, CA 91364

**PAYMENT INFORMATION:**

Application/Petition Fee: \$1,440.00  
Total Amount Received: \$1,440.00  
Total Balance Due: \$0.00

**NAME AND MAILING ADDRESS**

We have received your form and are currently processing the above case. If this notice contains a priority date, this priority does not reflect earlier retained priority dates. We will notify you separately about any other case you filed.

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**USCIS Contact Center Number:**

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ATTORNEY COPY

