

U.S. 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT
for the

FILED

OCT - 9 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature]
DEPUTY CLERK

IRADJ-ZAREI
Petitioner

v.

Case No. A [Redacted]
(Supplied by Clerk of Court)

South Texas ICE Processing Center
Respondent
(name of warden or authorized person having custody of petitioner)

SA 25CA 1286 FB

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: IRADJ-ZAREI
(b) Other names you have used: D.J.
2. Place of confinement:
(a) Name of institution: South Texas Processing Center
(b) Address: 566 Veterans Dr
Pearland TX, 77061
(c) Your identification number: A [Redacted]
3. Are you currently being held on orders by:
☒ Federal authorities ☐ State authorities ☐ Other - explain:
ICE
4. Are you currently:
☐ A pretrial detainee (waiting for trial on criminal charges)
☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you:
(b) Docket number of criminal case:
(c) Date of sentencing:
☒ Being held on an immigration charge
☐ Other (explain):

Decision or Action You Are Challenging

5. What are you challenging in this petition:
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

- ☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
☐ Disciplinary proceedings
☐ Other (explain):

6. Provide more information about the decision or action you are challenging:

- (a) Name and location of the agency or court: ICE Processing Center in
~~San Antonio TX~~
 (b) Docket number, case number, or opinion number:
 (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):
illegal detain (I was on supervision for last ten years
I did not broke any rules of supervision and my case with
County that they want against has been dismissed
 (d) Date of the decision or action: JULY, 17, 2025

Your Earlier Challenges of the Decision or Action

7. First appeal

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☒ Yes
 ☒ No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court: immigration court at Pearshall
 (2) Date of filing:
 (3) Docket number, case number, or opinion number:
 (4) Result:
 (5) Date of result:
 (6) Issues raised:

(b) If you answered "No," explain why you did not appeal:

8. Second appeal

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☒ Yes
 ☐ No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court: *D.H.S. 1777 N.E. Loop 410*
(2) Date of filing: *San Antonio, TX, 78217*
(3) Docket number, case number, or opinion number: *Sep. 17, 2025*
(4) Result: *NO RESULT NO A*
(5) Date of result:
(6) Issues raised:

(b) If you answered "No," explain why you did not file a second appeal: _____

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☒ Yes ☐ No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court: *Western District of Texas*
E. 65 U.S. Courthouse 655 E. Cesar Chavez
(2) Date of filing: *San Antonio TX 78206-1198*
(3) Docket number, case number, or opinion number: *[REDACTED]*
(4) Result:
(5) Date of result:
(6) Issues raised:

(b) If you answered "No," explain why you did not file a third appeal: _____

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes ☒ No

If "Yes," answer the following:

- (a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?
☐ Yes ☒ No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

- (1) Name of court: _____
 (2) Case number: _____
 (3) Date of filing: _____
 (4) Result: _____
 (5) Date of result: _____
 (6) Issues raised: _____

- (b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes☐ No

If "Yes," provide:

- (1) Name of court: _____
 (2) Case number: _____
 (3) Date of filing: _____
 (4) Result: _____
 (5) Date of result: _____
 (6) Issues raised: _____

- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

*BECAUSE I WAS ON SUPERVISION FOR
 LAST 10 YEARS I DID NOT BROKE ORDER OF SUPERVISION*

*AT THE LAST VISIT I WAS 10 MINUTES EARLY AND
 IT DETAINED ME FOR NO REASON PLUS THE CASE
 WITH COUNTY WAS DONE (10 YEARS OF PROBATION JUDICATION)
 ON JUNE 14, 2025 AND THEY DETAINED ME ON JULY 17, 2025*

11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

☒ Yes☐ No

If "Yes," provide:

- (a) Date you were taken into immigration custody: *JULY 17, 2025*
 (b) Date of the removal or reinstatement order: *NOVEMBER 05, 2015*
 (c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes☒ No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

- (1) Date of filing:
- (2) Case number:
- (3) Result:
- (4) Date of result:
- (5) Issues raised:

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes

☒ No

If "Yes," provide:

- (1) Name of court:
- (2) Date of filing:
- (3) Case number:
- (4) Result:
- (5) Date of result:
- (6) Issues raised:

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes

☒ No

If "Yes," provide:

- (a) Kind of petition, motion, or application:
- (b) Name of the authority, agency, or court:
- (c) Date of filing:
- (d) Docket number, case number, or opinion number:
- (e) Result:
- (f) Date of result:
- (g) Issues raised:

I Been on iGe Supervision For Last 10 years and
I have Proved To Them That I am not a danger To
Society (After taking rehab classes For 4 Hours a week For
Four years) and I am not a #Light Risk.

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: NOV. 2015 when I went to immigration court because I am Christian and I could be in danger with the Government Judge (Patricia Cobb) put me in protection of law against torture and send me back to San Antonio and the attorney for DHS told the -

- (a) Supporting facts (Be brief. Do not cite cases or law.):
- Judge that they will not appeal the case forever and the next day before they realize me ICE called and they said they going to give me temporary resident card I said "O.K." and they called for second time and said I get my card when I go to S.A. I said "O.K." and they called for 3rd time and said that

(b) Did you present Ground One in all appeals that were available to you?

☐ Yes ☐ No They are going to give my resident card back when my ten years of probation over with County (Bexar) I said

GROUND TWO: I completed my ten years of probation judicial with BEXAR County (on June 14, 2025) and July 17, 2025 I had appointment to pick up my resident card when I went to ICE to get my card back they detained me (they broke their rule)

(a) Supporting facts (Be brief. Do not cite cases or law.):

when ICE detained me they said their order is are to detain every body comes thru the door (regardless of any case)

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes ☐ No

GROUND THREE: ICE had 10 years to deport me when my probation with the County ongoing they waited till my case was dismissed then they detained me. They broke the rules

(a) Supporting facts (Be brief. Do not cite cases or law.):

I been a residence of Texas for 47 years and behind my resident card says the holder of this card is a resident of Texas as long as he or she residing in the state I want this card to know I never left the state Texas.

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes ☒ No

Because they did not tell Judge they are going to keep my resident card at the time.

GROUND FOUR:

Since I use to work with the F.B.I as an informant
DePorting me to any country puts my Life in danger
(a) Supporting facts (Be brief. Do not cite cases or law.):

if you check the List of People Helped F.B.I.
you see my name in that List.

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes

☒ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

I did not present Ground Four never before now
Because its Confidential and don't want To Be a Public
Record.

Request for Relief

15. State exactly what you want the court to do: 1. I am requesting For immediate
release from detention. 2. I am requesting to get
my resident Card Back (I need my resident Card to renew
my driver License) so I can have Valid I.D.

3. if I qualified I like to get 3 month of Lost wage!
at 200 Per day For the Total amount of
\$ 18000.00 For
illegal detention.

Thank You and God Bless
P.S. Since ice is causing me Lose my Trailer and my Tool
and everything else that I accumulate in Last 10 Year
I Like to ask for Pain & Suffering for the Court choosing them

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

Tue, Oct, 7, 2025

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: Oct, 07, 2025

Arash Zaree

Signature of Petitioner

Signature of Attorney or other authorized person, if any

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Instructions

1. **Who Should Use This Form.** You should use this form if
 - you are a federal prisoner and you wish to challenge the way your sentence is being carried out (*for example, you claim that the Bureau of Prisons miscalculated your sentence or failed to properly award good time credits*);
 - you are in federal or state custody because of something other than a judgment of conviction (*for example, you are in pretrial detention or are awaiting extradition*); or
 - you are alleging that you are illegally detained in immigration custody.
2. **Who Should Not Use This Form.** You should not use this form if
 - you are challenging the validity of a federal judgment of conviction and sentence (*these challenges are generally raised in a motion under 28 U.S.C. § 2255*);
 - you are challenging the validity of a state judgment of conviction and sentence (*these challenges are generally raised in a petition under 28 U.S.C. § 2254*); or
 - you are challenging a final order of removal in an immigration case (*these challenges are generally raised in a petition for review directly with a United States Court of Appeals*).
3. **Preparing the Petition.** The petition must be typed or neatly written, and you must sign and date it under penalty of perjury. A false statement may lead to prosecution.
4. **Answer all the questions.** You do not need to cite law. You may submit additional pages if necessary. If you do not fill out the form properly, you will be asked to submit additional or correct information. If you want to submit any legal arguments, you must submit them in a separate memorandum. Be aware that any such memorandum may be subject to page limits set forth in the local rules of the court where you file this petition. If you attach additional pages, number the pages and identify which section of the petition is being continued. All filings must be submitted on paper sized 8½ by 11 inches. **Do not use the back of any page.**
5. **Supporting Documents.** In addition to your petition, you must send to the court a copy of the decisions you are challenging and a copy of any briefs or administrative remedy forms filed in your case.
6. **Required Filing Fee.** You must include the \$5 filing fee required by 28 U.S.C. § 1914(a). If you are unable to pay the filing fee, you must ask the court for permission to proceed in forma pauperis – that is, as a person who cannot pay the filing fee – by submitting the documents that the court requires.
7. **Submitting Documents to the Court.** Mail your petition and _____ copies to the clerk of the United States District Court for the district and division in which you are confined. For a list of districts and divisions, see 28 U.S.C. §§ 81-131. All copies must be identical to the original. Copies may be legibly handwritten.

If you want a file-stamped copy of the petition, you must enclose an additional copy of the petition and ask the court to file-stamp it and return it to you.
8. **Change of Address.** You must immediately notify the court in writing of any change of address. If you do not, the court may dismiss your case.

Office of Enforcement and Removal Operations

U.S. Department of Homeland Security
1777 NE Loop 410
San Antonio, TX 78217

Date of Detention
July 17, 2025



U.S. Immigration
and Customs
Enforcement

Zarei, Iradj
c/o Immigration and Customs Enforcement
San Antonio Field Office



Notice to Alien of File Custody Review

You are detained in the custody of U.S. Immigration and Customs Enforcement (ICE) and you are required to cooperate with ICE in effecting your removal from the United States. If ICE has not removed you from the United States within the removal period as set forth in INA 241(a) (normally 90-days of either: 1) your entering ICE custody with a final order of removal, deportation or exclusion, or 2) the date of any final order you receive while you are in ICE custody), ICE's Deciding Official will review your case for consideration of release on an Order of Supervision. Release, however, is dependent on your demonstrating to the satisfaction of the Attorney General that you will not pose a danger to the community and will not present a flight risk.

Your custody status will be reviewed on or about 09/29/2025. The Deciding Official may consider, but is not limited to considering the following:

1. Criminal convictions and criminal conduct;
2. Other criminal and immigration history;
3. Sentence(s) imposed and time actually served;
4. History of escapes, failures to appear for judicial or other proceedings, and other defaults;
5. Probation history;
6. Disciplinary problems while incarcerated;
7. Evidence of rehabilitative effort or recidivism;
8. Equities in the United States;
9. Cooperation in obtaining your travel document;
10. Any available mental health reports.

You may submit any documentation you wish to be reviewed in support of your release, prior to the date listed above, to the attention of the Officer and address below. English translations must be provided pursuant to 8 CFR 103.2(b)(3). An attorney or other person may submit materials on your behalf. The deciding official will notify you of the decision in your case. Attached to this notice is a list of free or low cost legal representatives who may be able to provide assistance to you in preparing your case.

Nothing Happened!
I Been Searching For answer.
Iradj Zarei

www.ice.gov

10-7-25