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7 *Pro Bono Counsel for Petitioner*

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

10
11 **ALIREZA KARIMI**

12 Petitioner,

13 v.

14 **JEREMY CASEY et al.,**

15 Respondents.

Case No.: 3:25-cv-03116-JO-BJW

**DECLARATION OF
ALIREZA KARIMI IN
SUPPORT OF PETITION**

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19 **DECLARATION OF ALIREZA KARIMI**

20 I, ALIREZA KARIMI, declare:

21 1. I am detained in the Imperial Regional Detention Facility in
22 Calexico, California. I am over eighteen years of age. I make this
23 declaration of my own personal knowledge and if called as a witness
24 would competently testify to its contents.

25 2. I am twenty-eight years old and a national and citizen of
26 Afghanistan. I entered the United States on July 24, 2024, to seek
27 asylum because I fear harm by the Taliban if I am returned to

1 Afghanistan. My immediate family, including my mother, father, two
2 brothers and sister, have all fled Afghanistan and are currently living
3 safely in Canada.

4 3. I have been in the custody of the United States government
5 ever since I entered the United States.

6 4. Less than a week after entering the United States I was sent
7 to a detention facility in Aurora, Colorado. There, I obtained the
8 assistance of a local *pro bono* attorney to apply for asylum and
9 related relief from removal.

10 5. My final hearing was on March 11, 2025, in Aurora,
11 Colorado. Immigration Judge McGrail determined that I was not
12 eligible for asylum because of I did not enter the United States with a
13 CBP One appointment, but found that I qualified for Withholding of
14 Removal. She thus ordered me removed but withheld my removal as
15 to Afghanistan. Both DHS and I waived appeal of the decision.

16 6. As I remained in detention in Aurora, Colorado, I was
17 informed by an ICE officer that I would not be released from
18 detention because ICE was seeking to remove me to either Panama,
19 Guatemala or Nicaragua.

20 7. On June 3, 2025, I was transferred to the Imperial Regional
21 Detention Facility in Calexico, California.

22 8. On June 6, 2025, I met with my new deportation officer,
23 Officer Ann Ferrari, who gave me forms to sign, including a Notice
24 to Alien of File Custody Review, a Warning for Failure to Depart,
25 and an Instruction Sheet. I signed and received a copy of these
26 documents.

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1 9. Once 90 days had passed from the date of my final order, I
2 did not receive an update about my detention status.

3 10. I continued to meet with Officer Ferrari about once a
4 month and to sign all documents presented to me. I have always
5 cooperated with her requests, including in efforts to find a safe third
6 country, and have never refused to sign any documents.

7 11. On September 4, 2025, Officer Perez of ICE met with and
8 briefly interviewed me. He asked about my identity and where I
9 would live if I am released from detention. He also asked if I have
10 ever been imprisoned or if I have any criminal history, and I replied
11 that I have not and did not. After the interview, he said he would
12 send the interview to "headquarters," which would then issue a
13 decision as to whether I will be released or remain detained.

14 12. The next day, on September 5, 2025, I met with Officer
15 Ferrari and was given more documents to sign. One of these
16 documents was entitled "Decision to Continue Detention." I noticed
17 that the document had been signed on June 2, 2025. When I
18 mentioned this to Officer Ferrari, she admitted that the document was
19 not provided to me in Colorado but that she received an email asking
20 for it to be served on me now.

21 13. A few days later, once 180 days had passed since the date
22 of my final order, I sent a message to ICE through a tablet at the
23 detention center asking about the status of my custody review. I was
24 verbally told that my case is still under review and that ICE was still
25 waiting for a response from "headquarters."

26 14. I signed a retainer agreement in late August 2025 with
27 Casa Cornelia Law Center and on September 9, 2025, my *pro bono*

1 attorney contacted me to tell me that he was entering his appearance
2 in my case.

3 15. A few weeks later my attorney told me that he was having
4 trouble getting my ICE officer to respond to him and that he did not
5 have her email address to contact her directly. Because I had my
6 officer's email address, I provided it to him.

7 16. The next time I spoke with my attorney, he said that he
8 had emailed Officer Ferrari multiple times but had not heard back.

9 17. When I told Officer Ferrari that my attorney was waiting
10 for her response, she told me she is unable to answer my attorney's
11 emails but is forwarding them to DHS counsel so they can
12 correspond with my attorney.

13 18. Around September 25, 2025, ICE Officer Gonzalez
14 visited my detention unit. I asked him about my detention status. He
15 looked into my question and told me that on September 23, 2025,
16 "headquarters" issued a decision stating that I was to remain in
17 custody. When I asked the reason for that decision, he told me he
18 could not access additional information.

19 19. In early October 2025, Officer Ferrari visited me for an
20 interview. She asked many questions, including about my travel
21 history, family, religious beliefs, and if I had status in another
22 country. I answered all her questions and indicated that I have no
23 status in another country. After the interview, she told me she would
24 send the interview to DHS counsel and that I should wait for further
25 information.


26 20. Around October 23, 2025, Officer Ferrari visited me and
27 told me that my detention status was "in limbo." I asked her to
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1 explain what she meant. She said that it meant that I was stuck in
2 detention because I could not be removed to Afghanistan nor released
3 into the United States.

4 21. On October 31, 2025, I had a bond hearing with
5 Immigration Judge Simpson. I submitted a declaration and copies of
6 all documents I have received from ICE following my March 11,
7 2025, final order.

8 22. I testified in English at my hearing. I testified that I have
9 no criminal record; that I have not received any documents from ICE
10 since my final order other than those I submitted in support of my
11 bond hearing; that my ICE officer had recently told me that I was
12 detained "in limbo"; that I do not have an Afghan passport because I
13 lost it during my travel to the United States; that I have cooperated
14 with all of ICE's requests; that ICE approached me in June 2025 to
15 apply for a new passport from Afghanistan, and that I have been
16 cooperating with that process; and that my family is no longer in
17 Afghanistan. The immigration judge denied my bond request because
18 he said he did not have jurisdiction.

19 23. To this date, I have not received any further updates from
20 ICE about my detention.

21 24. I am suffering from stress and depression because I have
22 been in detention for over 15 months even though I have no criminal
23 record and entered the United States only to seek help and safety. An
24 immigration judge found that I will more likely than not suffer
25 persecution in Afghanistan because of my  ethnicity and the
26 well-documented persecution of people of my ethnicity by the
27 Taliban.

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CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record at the following email addresses:

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DATE: November 19, 2025

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