


EMERGENCY REQUEST FOR
RELEASE FROM ICE DETENTION

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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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CV25-04337-PHX-KML-ASB

SUBMITTED BY:
 RODION VLADIMIROVICH
 NAZAROV CAH 

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REFERENCE LRCP 5.4
(Rule Number/Section)

YOUR HONOR,

My NAME IS RODION VLADIMIROVICH NAZAROV, A# [REDACTED] I AM CURRENTLY DETAINED by U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE) AT THE SAN LUIS REGIONAL DETENTION CENTER, SAN LUIS, ARIZONA.

I WAS TAKEN INTO ICE CUSTODY ON FEBRUARY 28, 2025, AND I HAVE BEEN DETAINED FOR OVER 150 DAYS. THIS PROLOGED DETENTION EXCEEDS CONSTITUTIONAL LIMITS AND VIOLATES SUPREME COURT PRECEDENT.

1) NO FORESEEABLE POSSIBILITY OF REMOVAL.

I WAS GRANTED WITHOLDING OF REMOVAL. THE UNITED STATES IS LEGALLY PROHIBITED FROM REMOVING ME TO RUSSIA. NO OTHER COUNTRY HAS AGREED TO ACCEPT ME,

3) AND ICE HAS PROVIDED NO EVIDENCE THAT REMOVAL IS POSSIBLE IN THE FORESEEABLE FUTURE.

2) SUPREME COURT REQUIREMENT -
ZADVYDAS V. DAVIS

UNDER ZADVYDAS V. DAVIS,
533 U.S. 678 (2001)

- DETENTION BEYOND 90 DAYS IS PRESUMPTIVELY UNREASONABLE.
- DETENTION APPROACHING 180 DAYS BECOMES UNCONSTITUTIONAL WITHOUT PROOF OF A LIKELY REMOVAL.

3) I DO NOT POSE A DANGER TO THE COMMUNITY.

I HAVE NO HISTORY OF VIOLENCE.
I HAVE STABLE HOUSING AND STRONG FAMILY SUPPORT AVAILABLE IMMEDIATELY UPON RELEASE.

4) HUMANITARIAN CIRCUMSTANCES.

MY HEALTH HAS WORSENERED DURING DETENTION. MY WIFE AND YOUNG CHILD

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4) depend on my presence and support.
CONTINUED DETENTION CAUSES UNNECESSARY SUFFERING WITHOUT ANY LEGITIMATE IMMIGRATION PURPOSE.

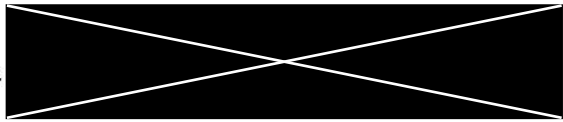
REQUEST TO THE COURT.

I. RESPECTFULLY ASK THE COURT TO:


1. ORDER MY IMMEDIATE RELEASE FROM ICE CUSTODY; OR
2. REQUIRE ICE TO PROVIDE LEGAL JUSTIFICATION FOR MY CONTINUED DETENTION, GIVEN THE ABSENCE OF ANY FORESEEABLE POSSIBILITY OF REMOVAL.

RESPECTFULLY,

RODION VLADIMIROVICH

NAZAROV A # 

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
Seattle, Washington

File No.: A )	Nov. 6, 2006
)	
In the Matter of:)	
Nazarov, Rodion)	IN REMOVAL PROCEEDINGS
)	
Respondent)	Before Immigration Judge
)	Kenneth Josephson

CHARGE: Drug Offender.

APPLICATION: Asylum.

ON BEHALF OF RESPONDENT:
Nicholas Marchi, Esq.

ON BEHALF OF DHS:
Tammy Fitting, Esq.

ORDER OF THE IMMIGRATION JUDGE

This case was fully discussed with counsel on Oct. 30. At that time, I was authorized by them to enter a new oral decision on the basis of existing record and they waived their right to present any further evidence. I stated that I would reserve appeal for both sides and that either side could listen to the oral decision at either the court or by providing us with a blank cassette.

For reasons set out therein, I deny asylum in the exercise of administrative discretion. Respondent continues in his prior status as an individual having been granted withholding of removal as to Russia.

