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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

**AT TACOMA**

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CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

**MUHAMMAD CHAUDHRY,**

Petitioner,

v.

**PAMELA BONDI,**

Respondent.



**\*DETAINED\***

Case No. 2:25-cv-02339-DGE-MLP

**PETITIONER'S REPLY AND  
SUPPLEMENTAL EVIDENTIARY  
SUBMISSION IN SUPPORT OF  
EMERGENCY MOTION FOR  
TEMPORARY RESTRAINING  
ORDER AND HABEAS RELIEF**

Petitioner, Muhammad Zahid Chaudhry, respectfully submits this **Reply and Supplemental Evidentiary Submission** in support of his emergency Motion for a Temporary Restraining Order (Dkt. 2) and petition for writ of habeas corpus. This reply is submitted **immediately** upon notice that Respondent filed its opposition on



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Sunday, November 23, 2025—a filing Petitioner cannot access because he is detained and proceeding pro se, and because he cannot be served electronically.

In light of the urgency recognized by this Court and the risk of irreparable harm documented herein, Petitioner submits this reply **without awaiting postal delivery of Respondent's filings**, and addresses the likely substance of Respondent's arguments based on the titles of their attachments and the long-established patterns of litigation in this matter. This submission provides: (1) new expert evidence; (2) new factual developments inside the Northwest Detention Center; and (3) narrowly tailored anticipatory rebuttal addressing issues Respondent is expected to raise in its forthcoming response.

This Court's November 21, 2025 Order acknowledges both the urgency of Petitioner's situation and the Court's authority to rule expeditiously. Petitioner therefore files this reply now—**in the interest of extreme speed**, to ensure the Court has the most complete and current evidentiary record possible even before Petitioner receives Respondent's filings through the mail. The following supplemental evidence is submitted to ensure the record before the Court is




complete, current, and materially relevant to irreparable harm, likelihood of success, and the public interest.

## **I. NEW RELEVANT EVIDENCE REGARDING MEDICAL RISK AND NEUROLOGICAL HARM**

Petitioner submits the declaration of **Micaela Elys Romero**, a researcher in the Neural Systems & Behavior Department at the University of Washington, specializing in the neurobiological impacts of incarceration, social isolation, sensory deprivation, and circadian disruption. Ms. Romero is familiar with Petitioner, his baseline functioning, his community role, and the medically documented deterioration he has experienced since entering detention.

**Her declaration (Exhibit A) sets forth the following:**

1. **Individuals with Traumatic Brain Injury (TBI) experience severe and disproportionate harm in confinement settings, including from chronic bright light exposure, circadian disruption, noise, sleep interruption, sensory deprivation, and unpredictable sensory stimulation cycles.**

- 
2. Mr. Chaudhry's initial six days and five nights in 24/7 bright-light "medical isolation" placed him at high risk for neuroinflammatory cascades, cognitive impairment, intensified migraines, autonomic dysregulation, and visual-processing decline.
  3. For a patient undergoing active treatment for **Thyroid Eye Disease**, interruptions in endocrinology, ophthalmology, immunology, and infusion therapy can cause **permanent and irreversible structural damage**, including blindness.
  4. The Northwest Detention Center is **clinically incapable** of providing the coordinated, specialized care Petitioner requires, and the environment itself worsens the neurological and ophthalmologic conditions it purports to manage.
  5. Each additional day of detention compounds the harm and increases the risk of permanent neurological and visual injury.

This expert analysis directly supports the irreparable-harm prong of the TRO standard and contextualizes the deterioration documented by Petitioner's sworn



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statement and fully consistent with the medical diagnosis provided by Dr. Jason Lewis, Petitioner's treating ophthalmologist at Madigan Army Hospital.

## **II. NEW DEVELOPMENTS INSIDE THE DETENTION FACILITY**

**As of November 22, 2025, ICE staff have abruptly begun approaching Petitioner to “coordinate” medical care. This follows months of foot-dragging and constructive denial of access to his specialists, and only after Petitioner sustained significant harm from isolation conditions - having been kept in 24/7 bright-light solitary confinement for the first week of his detention, “light-sick” under conditions recognized as torture, prohibited in the treatment of animals in captivity, and certain to exacerbate his traumatic brain injury and neuroimmunological conditions - compounded by significant harms imposed by the conditions of detention, including denial of darkness, lack of windows or meaningful yard time, inadequate nutrition, crowding and constant noise, and the profound, neurological stress of arbitrary and capricious authority. *These experiences strike all the worse within a patriotic, disabled U.S. military veteran, who believes in the principles of America with his whole heart.***



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This abrupt shift to "coordinating treatment" does not undermine the showing of irreparable harm. Rather, it underscores:

- **prior neglect**, now being retroactively addressed only because of pending litigation; and
- the persistent inability of NWDC to provide the care Petitioner actually requires.

Petitioner's short, updated Declaration detailing these developments (Exhibit B) is attached.

### **III. ANTICIPATORY REBUTTAL TO EXPECTED GOVERNMENT ARGUMENTS**

Respondent's filing—though not yet accessible to Petitioner—is expected to argue that no emergency exists because Petitioner is now receiving "adequate care" or that care is being "scheduled." The following clarifications are submitted to ensure a complete and accurate record before the Court, notwithstanding Petitioner's inability to review Respondent's filing:

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**1. Sudden "coordination" is not adequate medical care.**

ICE's recent actions - taken suddenly, under litigation pressure, in a transparent attempt to minimize liability - do not correct the neurological and ophthalmologic harm already suffered, and do not *and cannot* provide access to the required endocrinology, ophthalmology, infusion medicine, and audiology specialists. Petitioner requires to closely coordinate every three weeks to administer his treatments.

**2. Delay is itself irreparable harm.**

Even short gaps in treatment for Thyroid Eye Disease and endocrine dysregulation carry a well-established risk of irreversible visual and structural damage. Petitioner has been without his established, carefully calibrated and multi-specialty treatment regimen for *three months*.

**3. Detention conditions themselves are dangerous for TBI patients.**

Ms. Romero's declaration explains that NWDC's environment inherently worsens Petitioner's TBI-related vulnerabilities. Her professional findings make clear that these harms are not hypothetical or speculative—they are *physiologically*



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*predictable* consequences of exposing a TBI patient to chronic bright light, circadian disruption, sleep fragmentation, and sensory imbalance. In other words, the conditions of confinement themselves operate as an accelerant of neurological damage for someone with Petitioner's injuries.

This is in addition to the documented and sworn deterioration of Petitioner's eyesight in the absence of his coordinated treatments for thyroid eye disease, a condition that requires strict medical continuity to prevent permanent structural damage to the optic nerve. Every lapse in treatment accelerates inflammation, tissue degradation, and vision loss, creating a compounding and irreversible injury trajectory that cannot be stabilized inside a detention environment. These mounting harms underscore the medical consensus: continued detention is not merely inadequate—it is actively dangerous to Petitioner's long-term neurological and visual survival.

**4. Petitioner poses no danger and no flight risk.**

Ms. Romero's declaration (and numerous prior exhibits) confirm Petitioner's extraordinary community standing, peaceful character, and decades of perfect compliance.



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Additionally, Petitioner - *a decorated, wheelchair-bound, honorable, patriotic U.S. Military veteran* - has lived openly and transparently in Washington State for more than 25 years, serving on state commissions, nonprofit boards, and veteran-support organizations. His deep community ties, medical vulnerability, and unwavering compliance history render any allegation of flight risk **implausible** in the extreme. His continued detention serves no legitimate governmental interest, while release would simply restore the stable conditions under which he has lived and litigated his case for two decades.

Petitioner is medically and physically incapable of flight, and his family, treatment providers, and entire support system are located solely in Washington State. Any contrary suggestion would be untethered from the factual record.

**5. Public interest strongly favors release.**

Statements from Washington State legislators and community leaders reinforce the high public value of Petitioner's release pending adjudication. These officials— including bipartisan lawmakers, veterans' advocates, faith leaders, and members of the Washington State Legislative Black, Latino, and Disability caucuses— have repeatedly emphasized that Petitioner's continued detention harms not only his



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family but the wider community he has served for decades. Their unified stance reflects an exceptional degree of public alignment: that **releasing a decorated, disabled U.S. veteran to resume critical medical care and reunite with his infant children is consistent with Washington's and America's values, its public-safety priorities, and its longstanding commitment to honoring military service.**

#### **IV. ATTACHED EXHIBITS**

Petitioner submits the following exhibits in support of this Reply and Supplemental Evidentiary Submission:

##### **Exhibit A – Declaration of Micaela Elys Romero**

A detailed scientific declaration from Ms. Romero, a researcher in neural systems and behavior at the University of Washington, describing the severe and predictable neurological and medical harms Petitioner is suffering in detention, the risks of continued confinement, and her personal knowledge of Petitioner's character, integrity, and community leadership.



**Exhibit B – Declaration of Petitioner (Muhammad Zahid Chaudhry)**

A sworn statement describing ICE's abrupt and belated attempts to "coordinate" medical care only after litigation pressure mounted, the harm already sustained from prolonged disruption of his treatment and TBI-exacerbating conditions inside NWDC, and the ongoing risks to his vision, neurological stability, and physical safety.

**Exhibit C – Declaration of Melissa Chaudhry**

A sworn declaration detailing the severe psychological, emotional, medical, and developmental harms suffered by Petitioner's two U.S. citizen infant children, the disruption to their family life, and the hardship imposed on the household by Petitioner's detention.

**V. CLARIFICATION OF PETITIONER'S IMMIGRATION HISTORY**

Because Respondent has filed exhibits consisting of "Immigration Documents," and because Petitioner cannot presently access those filings, Petitioner offers this brief clarification to ensure the Court has accurate foundational context.



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**Petitioner has always entered and remained in the United States lawfully. After fully-documented trips to visit family in the 1990s, his present residence began when he first entered on a valid visa in 2000 and lawfully adjusted status to **Lawful Permanent Resident (LPR)** in 2001. Aside from brief trips abroad - none since 2015 - he has remained continuously present in Washington State for more than 25 years.**

**Petitioner has never violated any law of the United States— criminal, civil, or administrative. He has never received a citation, arrest, charge, or conviction of any kind in the United States. His FBI criminal background checks in the Ninth Circuit's administrative record confirm a lifelong absence of criminal history.**

As Respondent is expected to submit older immigration records, Petitioner clarifies:

- **The "final order of removal" issued in 2008 has been under continuous litigation for 17 years, and its validity, service, jurisdiction, and factual predicates are all squarely before the Ninth Circuit in the consolidated petitions for review.**



- The 2018 Immigration Judge granted Petitioner relief, including waivers of all issues arising before that time. That adjudication — which came after **10 years of testimony, evidentiary review, and credibility findings** — is part of the ongoing federal review.
- Any disputed historical allegations do not bear on the present question: **whether a severely disabled U.S. Army veteran experiencing medical deterioration should be released during the pendency of federal court review.** They do not establish danger, nor do they create flight risk.

For over 25 years, Petitioner has lived transparently, peacefully, and deeply rooted in the civic and social fabric of Washington State. He has served on state and county commissions, local boards, and nonprofit organizations. He has consistently attended every immigration hearing for over two decades. His home, family, children, and medical providers are all here.

Accordingly, even if Respondent's filing includes older administrative documents, **none of them justify continued detention during habeas review**, nor do they outweigh the immediate medical risks detailed above.



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## **VI. REQUEST FOR EXPEDITED RELIEF**

This supplemental submission is narrowly tailored to provide material new evidence relevant to the Court's evaluation of Petitioner's emergency motion.

Petitioner respectfully requests that the Court:

1. **Consider this supplemental evidence** as part of the TRO and habeas record;
2. **Grant the pending Motion for Temporary Restraining Order, ordering Petitioner's immediate release** on recognizance under INA § 236(a) or pursuant to this Court's habeas authority; and
3. If appropriate, **rule immediately**, consistent with the authority noted in the Court's November 21 Order.
4. Grant any other such relief as the Court deems just and proper.

## **VII. RESERVATION OF RIGHTS**

Because Petitioner remains unable to access Respondent's filings or exhibits until postal service delivery reaches him inside the detention center, **Petitioner respectfully reserves the right to file a short supplemental reply** once those



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materials become available. Any such filing would be narrowly tailored and submitted only to correct factual misstatements or address newly-raised arguments.

*Petitioner further notes that, as a detained pro se litigant without electronic service, he cannot view docketed filings on PACER and may only access Respondent's submissions through delayed physical mail. Petitioner therefore requests that the Court take this structural barrier into account when weighing Respondent's assertions and the evidentiary record before it.*

Respectfully submitted,

**/s/ Muhammad Chaudhry**



**\*DETAINED\***

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Tacoma, WA 98421

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**Exhibits**

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**Exhibit A – Declaration of Micaela Elys Romero**

1 **DECLARATION OF MICABELA ELYS ROMERO**

2

3 **IN SUPPORT OF THE RELEASE OF MUHAMMAD ZAHID CHAUDHRY**

4 **I, Micaela Elys Romero, declare under penalty of perjury under the laws of the United States**  
5 **that the following is true and correct to the best of my knowledge:**

6

7 **1. MY BACKGROUND AND CREDENTIALS**

8 **I am a resident of King County, Washington. I currently serve as a Researcher in the Neural**  
9 **Systems & Behavior Department at the University of Washington, where my work focuses**  
10 **specifically on the neurobiological effects of incarceration, social isolation, and sensory**  
11 **deprivation. My research examines how confinement disrupts neural circuits responsible**  
12 **for vision, stress regulation, endocrine function, and circadian-rhythm disruption from**  
13 **lighting conditions in detention. I am deeply familiar with the immediate and long-term**  
14 **medical harm that isolation and interruption of medical care can cause to Mr. Chaudhry.**  
15 **Individuals with Traumatic Brain Injuries, like that which Mr. Chaudhry obtained during his**  
16 **military service, are disproportionately harmed by conditions of confinement, including**  
17 **chronic bright light, noise, sleep disruption, and sensory deprivation/simulation cycles.**

18 **I am also a Covington Human Services Commissioner, the Digital Organizer and Lead**  
19 **Communications staff for Washington Community Action Network, and I work extensively**  
20 **in legislative advocacy and community-based reentry support. In those roles, I regularly**  
21 **support families who are navigating reunification after periods of detention, and I am well-**  
22 **versed in the psychological and developmental trauma that occurs when parents are**

23 separated from their children at any age. I believe that Mr. Chaudhry's children and our  
24 community are better served by reunifying the Chaudhry family as soon as possible to  
25 foster social-emotional health and limit the trauma this experience has caused.

26 In addition to my academic and community work, I maintain a public portfolio of my  
27 research, published work, and community organizing projects at micaelaelys.com, which  
28 documents my ongoing research in neural systems and behavior focused on the impacts of  
29 isolation in detention centers and post-isolation reintegration, my legislative advocacy  
30 around the neurobiological harms of these conditions, and my collaborations with  
31 community organizations across Washington State.

32 This matter particularly touches home due to my military family background, as my  
33 grandfather was a Korean War veteran and a member of the first battalion of Green Berets  
34 to serve in the U.S. Army. He rests alongside three close family members also buried at  
35 Tahoma National Cemetery, less than two miles from my home, where we'll have additional  
36 cousins, uncles, and aunts that are currently serving or retired from the U.S. military, laid to  
37 rest.

38 I was raised with an understanding of the sacrifices veterans make for this country and the  
39 profound moral obligation we owe to them in return. I've also seen, in such proximity to  
40 veterans, how that obligation has not always been honored, as our veterans are  
41 underserved. Mr. Chaudhry understands that, too, and from a place of personal disability,  
42 still made it his passion to serve his veteran community and beyond as the President of  
43 Veterans for Peace, Olympia Chapter.

44

45 **2. MY RELATIONSHIP WITH MUHAMMAD ZAHID CHAUDHRY**

46 I have known Mr. Chaudhry for years as a community leader, mentor, father, and veteran. In  
47 multiple community organizing spaces, he is widely regarded as one of the most reliable,  
48 compassionate, and service-oriented individuals present. Whether on campus at the  
49 University of Washington, in the council chambers of Tacoma, or in legislative hearing  
50 rooms, the community has felt the presence and support of Muhammad Zahid Chaudhry  
51 and his family. Over time, I've come to consider them like family; my son reads to his  
52 children, and I have held them as infants. His son took his first steps in the University of  
53 Washington Life Sciences Building while I presented my research, which I hope will be a  
54 step in releasing his father to his rightful freedom.

55

### 56 3. ONGOING AND WORSENING MEDICAL HARM

57 Mr. Chaudhry is currently experiencing imminent, irreparable, and rapidly worsening harm  
58 while in detention. Before his detention, he was undergoing coordinated treatment for  
59 Thyroid Eye Disease, including specialized endocrinological management, ophthalmology,  
60 immunology, and infusion therapy that must be carefully sequenced every three weeks.  
61 This condition is aggressive, painful, and capable of causing permanent or total blindness if  
62 left untreated or inconsistently treated.

63 Since his detention, all of Mr. Chaudhry's medical care has been interrupted or destabilized,  
64 and his vision has deteriorated dramatically. Based on my scientific training, I can state that  
65 disruptions in continuity of care, especially for conditions involving inflammation, hormone  
66 dysregulation, and ocular tissue vulnerability, can result in permanent structural and  
67 functional loss. Every week of delay compounds this risk.

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68 As someone who studies the neurobiological impact of confinement and medical neglect,  
69 Mr. Chaudhry's current situation is medically untenable and presents an immediate threat  
70 to his ability to retain his vision and long-term neurological function. During his detention,  
71 Mr. Chaudhry has sustained severe circadian rhythm disruption known to cause  
72 neuroinflammatory responses, cognitive impairment, headaches, and visual processing  
73 deficits, among many endocrine function and nervous system disruptions. The Northwest  
74 Detention Center is unable to provide the advanced clinical conditions necessary to treat  
75 Mr. Chaudhry's neurological injuries and conditions, and by failing to do so and  
76 compounding conditions that exacerbate the harms of non-treatment, Mr. Chaudhry is  
77 certainly under ongoing and worsening neurological harm that is likely to be irreversible  
78 should it continue.

79

80 **4. NO DANGER TO THE COMMUNITY**

81 Muhammad Zahid Chaudhry poses no danger whatsoever to the community. In fact, he is  
82 the opposite: he is a source of stability, wisdom, and accountability. I have said since his  
83 detainment that our communities are worse off the longer he is away. He counsels veterans  
84 who are unwell, people who have suffered abuse and trauma. He is a staple for so many  
85 people who rely on his support and kindness. I regularly introduce my mentees, including  
86 young adults navigating complex life transitions as immigrants with the American Dream, to  
87 Mr. Chaudhry so they can learn from his example of community service, civic involvement,  
88 and moral clarity. The last introduction was just weeks before his detainment, when my 16-  
89 year-old Syrian mentee shared with him her love for the country but her experience with  
90 prejudices, and he, in turn, shared how he overcame prejudices post 9/11 and inspired her.

91 She is now one of thirteen on the Legislative Youth Advisory Council, desperately awaiting  
92 his return.

93 He is known across a wide range of organizations, multiple faith communities, and advocacy  
94 networks as someone who de-escalates conflict to side with peace, mentors youth, and  
95 helps newcomers feel safe and welcome. I have never, not once, observed behavior from  
96 him that could be construed as threatening, demeaning, or destructive.

97

98 **5. MUHAMMAD ZAHID CHAUDHRY POSES NO FLIGHT RISK**

99 Muhammad Zahid Chaudhry is absolutely not a flight risk. He has attended every required  
100 hearing for over twenty years. He is a disabled U.S. veteran who uses a wheelchair. His  
101 home, family, children, and medical providers are all here in Washington. He has no  
102 resources, support system, or medical infrastructure elsewhere in the world. Mr.  
103 Chaudhry's entire life, past, present, and future, is in Washington State.

104

105 **6. THE MORAL AND CIVIC IMPERATIVE REGARDING DISABLED VETERANS**

106 Special consideration should be given to disabled U.S. veterans, especially those who served  
107 with honor and remain tied to the land, community, and institutions of this country. We will  
108 continue to provide Mr. Chaudhry with VA benefits because the federal government  
109 recognizes its ongoing responsibility to him. We also know that when Mr. Chaudhry passes,  
110 whether years from now or prematurely because of medical neglect, he will be buried in U.S.  
111 soil alongside his fellow veterans.

112 There is no logic, justice, or compassion in forcing him to die abroad, alone, endangered, and  
113 deprived of care, only to return him to the United States for burial after the consequences of  
114 our inaction have already occurred. His death would occur much sooner overseas due to  
115 inadequate medical care, and such an outcome would be an irreversible harm both to him  
116 and to his family. Mr. Chaudhry is emphatically patriotic, and his belief in American ideals,  
117 liberty, and justice for all, increases the psychological suffering inflicted by his detention.

118

119 **7. REQUEST FOR IMMEDIATE RELEASE OF MUHAMMAD ZAHID CHAUDHRY**

120 Regardless of the ultimate outcome of the larger case, I implore this Court to order Mr.  
121 Chaudhry's immediate release so that he may resume the lifesaving medical care he  
122 requires from injuries he sustained while serving this country and continue supporting his  
123 children, who depend on him emotionally, developmentally, and psychologically. His release  
124 is not only medically necessary but ethically necessary, and it aligns with the values we  
125 claim to hold as a nation committed to honoring veterans and safeguarding human dignity.

126

127 Mr. Chaudhry deserves to live out the remainder of his life here, on U.S. soil, among the  
128 family and community he has poured himself into, and where he will be laid to rest one day,  
129 regardless of this Court's ruling.

130

131 I declare under penalty of perjury that the foregoing is true and correct.

132

133 Executed on: November 23<sup>rd</sup>, 2025



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134 At: Covington, WA

135 *Micaela Romero*

136 Micaela Elys Romero

137 Declarant



## **EXHIBIT B - DECLARATION OF PETITIONER (MUHAMMAD ZAHID CHAUDHRY)**

I, **Muhammad Zahid Chaudhry**, declare under penalty of perjury under the laws of the United States that the following is true and correct to the best of my knowledge:

### **1. Sudden Shift in ICE Behavior After Court Intervention**


Yes. ICE suddenly **STARTED** approaching me on Friday, November 21, 2025 to "coordinate treatment"—**only after** the actions of the Ninth Circuit Court of Appeals and the United States District Court. Not before. Not during the weeks and weeks when I was suffering, filing dozens and dozens of written requests and grievances. **Only after** federal courts got involved.

Even now, ICE still does **not** understand the complexity of the medical treatments I need. They do not understand that **FOUR different medical specialty clinics and hospitals** must perform "pre" and "post" exams and follow-ups **before and after every blindness-preventing transfusion treatment.**

This is not something a detention center can coordinate. This is not something they can replicate.

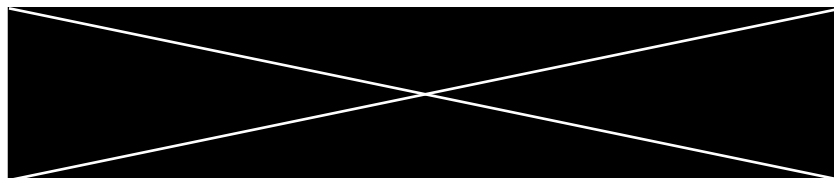
ICE is also **choosing, dictating, and forcing** over a million dollars of these medical treatment costs—treatments I normally receive through my private medical insurance and foundation support—to be dumped onto the American taxpayer. ICE does not have to waste or abuse taxpayer dollars. And yet ICE has chosen to do exactly that.

### **2. ICE Is Twisting the Story of Violence I Endured as an Immigrant Taxi Driver**

 For years, when I drove a taxi to support myself (in Australia in the 1990s), I was **brutally assaulted hundreds and hundreds of times**. At the end of their trips—rather than paying their fare—passengers would drag me out of the taxi and beat me.

They said to me:

- 
- 
- 



Police often came to the scene. They saw my blood, my injuries. They wrote reports. Sometimes they even charged the perpetrators with violent felony assault, fare evasion, theft, and more.

But in court, every single time, the judges—**biased and prejudiced**—found excuses to dismiss the cases. Not once did they hold the attackers accountable. Not once did they convict.

I went to newspapers. I went to media. I tried to raise awareness about what was happening to immigrant taxi drivers. I tried for years.

Now, ICE is taking these incidents—the assaults **I survived**—and **twisting the facts to blame me, the victim**. They are trying to turn my suffering at the hands of racists and criminals into a weapon against me.

This is wrong. This is dishonest. And this is the opposite of justice.

### **3. A Lifetime of Service to This Nation and Community**

Leaders from **both sides**—Republican and Democrat lawmakers, Congressmembers, Senators, and even former INS regional heads—have said I am the "ideal candidate for citizenship."

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For decades, I have given thousands and thousands of volunteer hours, including:

- City firefighter
- First responder
- EMT / paramedic
- Red Cross Youth Leadership Coordinator
- Habitat for Humanity home-building volunteer
- Volunteer for churches and faith communities
- Director of community foundations
- TV host of "Veterans Hour"
- Mentor to veterans, immigrants, and youth
- Community mediator and peace-builder

This is my life's record. This is who I am.

I have lived the values of this country every day. I have served and protected people here with everything I have. I have given **my health, my mobility, and the prime years of my life** to America.

And now this is how I'm rewarded. I'm accustomed to betrayal, I've suffered a lot of it in my life, but this takes this cake. This is devastating. I just want to go home, to my wife's cooking, to our children's love. I just want to be able to see my children's faces as they grow up, my wife's face as she gently ages alongside me. To remain able to watch a sunset together into our old age.



#### **4. Additional Facts Regarding My Deterioration Inside NWDC**

My physical condition is worse every day I remain in detention. The lighting, the noise, the abrupt sleep interruptions, the constant stress, and the lack of coordinated specialty care all make my service-connected TBI and my thyroid eye disease, worse. My vision is badly deteriorating. My migraines are stronger. I am having trouble with balance, memory, and concentration. These are not small things. These are signs of real neurological harm.

The Northwest Detention Center cannot meet my medical needs. It cannot replicate the four-clinic coordination that keeps me from going blind. It cannot provide the controlled environment required for someone with my injuries and disabilities.

I am not asking for luxury care. I am asking for what I need to stay functional - able to contribute to my community, care for my family, and maintain a rudimentary physical level of presence and enjoyment in my life.

#### **5. My Belief in America Despite Everything**

Even after everything that has happened to me—the discrimination, the surveillance, the false accusations, the brutality I endured, and now this detention—I still believe in the ideals of the United States. I believed in them when I took the soldier's oath. I believed in them when I served. I believed in them when I volunteered thousands of hours for my community. And I believe in them now.

My love for this country is not shaken. But my body is. My health is. And my family is.

I want to heal. I want to continue serving. I want to raise my children to be proud Americans, proud of their father, and proud of their country. I want them to inherit a nation that keeps its promises.



**6. Additional Clarification Relevant to the Court**

Nothing about my past or my immigration history makes me a danger or a flight risk. I have lived in Washington State for more than twenty-five years. I have attended every hearing, every appointment, every meeting with honor and discipline. I am 100% disabled. I use a wheelchair. My family, my medical providers, my entire life are all here.

I have never broken a single law of the United States. Not one. I have never been convicted of any crime in this country. I have spent my entire life contributing to this community and trying to make this state and this nation better. Any allegation suggesting otherwise is not true.

I want the Court to know this clearly: **my only goal is to return home to my family, receive the urgent medical care I need, and continue contributing as I always have.**

**7. Conclusion**

If the United States cannot protect *me*—a decorated, disabled U.S. Army veteran, a father of two U.S. citizen children, and a person who has spent decades serving this community—then who can it protect? If a man like me can be targeted, detained, medically endangered, and blamed for the violence committed against him, then what hope is there for others who are more vulnerable?

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

Executed on: November 24, 2025

At: Tacoma, WA

**/s/ Muhammad Zahid Chaudhry**



**\*DETAINED\***



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### **EXHIBIT C - DECLARATION OF MELISSA CHAUDHRY**

I, **Melissa Chaudhry**, declare under penalty of perjury under the laws of the United States that the following is true and correct to the best of my knowledge:

#### **Who I Am**

My name is **Melissa Chaudhry**. I am the wife of Petitioner, Muhammad Zahid Chaudhry. I am a mother of two young U.S. citizen children—our daughter, , age 2½, and our baby son, , who is nearly one year old. I am also a lifelong advocate for justice, a former congressional candidate in Washington State who ran on the principles of liberty and justice for all, and a person who believes deeply in the promise of the United States.

I am also the daughter of a retired Navy commander, and the granddaughter of a Nazi concentration camp survivor who immigrated after the war - as an "illegal alien," arriving without status. My grandfather had a pathway to citizenship open to him when my father was a child. My father has had an exceptional career, rising to pathbreaking levels within the Office of Naval Research, DARPA, NATO, and more - and now I've made history in my run for Congress with a grassroots budget and the shortest possible campaign, going head to head with a sitting Congressman in debates, endorsement interviews, etc - and winning.

I am also a "daughter of the Mayflower." On my mother's side, our family has been on this continent since the 1600s. My existence is proof of the success of the American Dream... for those with white skin. My goal and mission in life is to further the right and just expansion of that dream to *all* people. As I said on the campaign trail, **anyone who comes to America believing in American principles and with the goal of contributing to American society is already an American.** Our job - my job, politically - is to make the reality of the paperwork match that fundamental truth.



### **Who My Husband Is**

My husband, Muhammad Zahid Chaudhry, embodies that fundamental truth. He has lived it every day for more than twenty-five years—through his military service, through the injuries that forever altered his body and mind, and through the tens of thousands of hours he has poured into serving the people of Washington State. His life is proof that loving this country, contributing to it, and believing in its promise does not require having been born here; it requires character, courage, and an unshakeable commitment to the common good—qualities he has demonstrated more consistently and more humbly than many who take our citizenship for granted.

And beyond all of that, Zahid carries America in his bones in a way I have rarely seen. He believes in this country fiercely—not naively, not blindly, but with the earned conviction of someone who has tasted both its promise and its betrayals and still chooses hope. Even after enduring surveillance, suspicion, discrimination, and now detention, he has never stopped loving this nation or fighting for its best self. His patriotism is not theoretical; it is lived—measured not in slogans, but in service, sacrifice, and an unwavering belief that America can and must live up to what it claims to be.

He is the kind of American who makes other Americans braver. He is the kind of neighbor who makes communities stronger. And he is the kind of man whose integrity exposes, by contrast, the pettiness and cruelty of those who would use power to harm the vulnerable. If there is any justice left in our institutions, it must be able to recognize the truth of a life like his.

### **Our Family Since His Detention**

Since the moment ICE seized my husband at his naturalization interview on August 21, 2025, our home has been living through a grief that is too large for the size of our children. It has rearranged the air in our house. It has rewritten the

shape of our days. And it has broken open wounds that a family should never have to carry.

Our daughter, [REDACTED]—whose name means [REDACTED]—is only two and a half. She knows her father was taken. She knows he did nothing wrong. She knows her Baba is a good man—she tells me so every day. She asks whether the judge has decided. She asks whether I've brought him home yet. Her innocence has been forced to hold truths she should have been protected from for many more years.

Our baby son, [REDACTED]—whose name means [REDACTED]—is not yet one. Every morning, he wakes, sees the framed photograph of his father on our wall, and lifts his arms up toward it—wide, joyful, expecting Zahid to be there in the room with him. And when Zahid does not appear, [REDACTED] looks confused, then distressed, and then lost. His first year of life—when bonding with a father is foundational to lifelong stability—has been violently interrupted.

The harms to our children are not abstract; they are not theoretical. They are immediate, daily, and deep. They constitute **irreparable harm** under U.S. law because family separation *is* irreparable harm. And no study, no expert, no policymaker could explain that truth more clearly than the way my children already live it.

Zahid is the anchor of our family—its center of gravity. Without him, there is a constant, aching absence. The empty chair at our family table is a wound we feel every day.

Zahid is the person who:

- fixes our family cars with me, side by side, including the night before his naturalization interview when ICE seized him;
- cooks with me, cleans with me, prays with me, parents with me;

- supports me through the exhaustion of caring for two young children;
- helps maintain our home, our land, and our small orchard;
- provides warmth, comfort, and stability to our children.

His absence has created a profound emotional, logistical, and psychological strain. We are doing everything in our power to hold our lives together, but no amount of strength—no matter how lovingly shared—can replace a father in the lives of his infants, or a husband in the soul of his wife.

## **America - Who Will We Be?**

**Muhammad Zahid Chaudhry is an honorable, decorated, disabled U.S. Army veteran. He is wheelchair-bound from injuries sustained in service to this country. And yet he has dedicated his entire adult life to our community.**

He is a mentor, a helper, a healer, a builder. He is never without something constructive in his hands. He gives generously—with time, with labor, with compassion, and with wisdom. For our entire marriage, he's constantly been contributing to nonprofit boards, civic projects, community empowerment, service to the vulnerable, care for our family, nurturing and protection and empowerment of myself and our children. My run for Congress would have been a laughable prospect, over before it started, without his fiercely loving energy, dedication, sacrifice, and willingness to pour twenty years' of his hard-won moral and social capital behind me.

If **this** man does not deserve his freedom, his healthcare, and his family, then no one does. If **this** man does not deserve safety and dignity after serving this nation, then no one does. If **this** man—after 25 years building and uplifting communities in Washington State—does not deserve the rightful protection of American law, then none of us are safe.

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I ran for Congress last year on a campaign built on the belief that America could live up to its highest ideals. I spoke about our nation's promise: **liberty and justice for all—no asterisks attached.**

Today, I am watching my husband—a man who has given his health, his mobility, and the prime years of his life to this country—imprisoned, underfed, chronically sleep deprived and noise assaulted, in buildings with no windows, with no charges against him, with no power except his mind and mindset, with no time frame for release, and with no way out of a facility that cannot meet his medical needs, while our children wait at home for their father.

This is not the America I believe in.

But I still hold faith that the rule of law, compassion, and justice will prevail. And that we will not pass down to our children a world in which bullies and liars triumph over good, hardworking people who have done everything right.

To corroborate the record.... Zahid is at **immediate risk**. His eye disease is worsening. His traumatic brain injury is being aggravated daily by conditions inside the Northwest Detention Center. He is losing vision. He is in pain. And he is deteriorating in ways that may soon be irreversible.

Your Honor -- We need him home. Not eventually. Not when it's convenient. Not after weeks or months of procedural delay. **We need him home now.**

For his health. For our children. For our family. For the basic moral commitments this country owes to the veterans who have served it. For the future of America.

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

Executed on: November 24, 2025

At: Tacoma, WA

**Melissa Chaudhry**

## Certificate of Service

I certify that on November 24, 2025, I caused a true & correct copy of the foregoing filing to be served on Respondent by Certified U.S. Mail addressed to:

Alana T. Duong  
U.S. Department of Justice  
Office of Immigration Litigation: Carl Dawson  
P.O. Box 878  
See Franklin Station  
Washington, D.C.

Executed on November 24, 2025.

1/s/ M. Chaudhry



1623 E. J St

Tacoma, WA ~~98421~~

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