

Case No. 25-cv-62457-JB

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No.: 25-cv-62457-JB

KARIM SOUDBAKHSH,  
Petitioner,

v.

JUAN F. GONZALEZ, Assistant Field Office Director,  
Broward Transitional Center, et al.,  
Respondents.

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AMENDED PETITION FOR WRIT OF HABEAS CORPUS  
UNDER 28 U.S.C. § 2241 (PRO SE)

I, Karim Soudbakhsh, respectfully submit this Amended Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and state as follows:

1. I am currently detained by Immigration and Customs Enforcement (ICE) at the Broward Transitional Center in Pompano Beach, Florida.
2. I have a final order of removal from 1997, but in July 2002 the Board of Immigration Appeals granted me Withholding of Removal to Iran.
3. Because of this order, I cannot be removed to Iran, and DHS has not identified any third country willing to accept me.
4. I have no criminal history and have complied with all supervision requirements for more than 20 years.
5. I have now been detained for more than 180 days, and removal is not reasonably foreseeable.
6. My continued detention violates the Immigration and Nationality Act and the Supreme Court's decision in *Zadvydas v. Davis*, 533 U.S. 678 (2001).

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WHEREFORE, I respectfully request that this Court:

- A. Grant the writ of habeas corpus;
- B. Order my immediate release under reasonable supervision; and
- C. Grant any further relief the Court deems just and proper.

Executed on: 1/9/2026, 2025

  
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KARIM SOUDBAKHS

Petitioner (Pro Se)

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Broward Transitional Center  
3900 North Powerline Road  
Deerfield Beach, FL 33073

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I, Karim Soudbakhsh, certify that on 1/2/2026, 2025, I mailed a copy of the Amended Petition

and Motion to Accept Amended Petition to:

1. U.S. Attorney, Southern District of Florida

99 N.E. 4th Street, Miami, FL 33132

2. Attorney General of the United States

950 Pennsylvania Avenue NW, Washington, DC 20530


3. ICE Field Office Director (Miami)

865 SW 78th Avenue, Suite 101, Plantation, FL 33324

4. Broward Transitional Center Warden

3900 North Powerline Road, Deerfield Beach, FL 33073

Executed on: 1/2/2026, 2025



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KARIM SOUDBAKHSH