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11 UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
13

14  
15 HOSSEIN JOUDI-HAGHIGHI,  
16 Petitioner,  
17 v.  
18 KRISTI NOEM, Secretary, Department  
of Homeland Security, et al.,  
19 Respondents.  
20

No. 5:25-cv-03315-SSS-MAA

**FEDERAL RESPONDENTS'  
OPPOSITION TO PETITIONER'S  
MOTION FOR A PRELIMINARY  
INJUNCTION AND FOR A  
TEMPORARY RESTRAINING ORDER**

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1 **I. INTRODUCTION**

2 Petitioner Hossein Joudi-Haghighi is a former lawful permanent resident who was  
3 convicted multiple times for burglary and other offenses. He was arrested and detained  
4 by Immigration and Customs Enforcement (“ICE”) on June 9, 2025. Petitioner has filed  
5 a “motion for preliminary injunction and for a temporary restraining order” [Dkt. no. 3].

6 The TRO Application fails to comply with the evidentiary and procedural  
7 requirements for a litigant seeking preliminary injunctive relief. Most obviously,  
8 Petitioner did not submit the supporting declaration required for such motions by Local  
9 Civil Rule 65-1 and FRCP 65. Judge Staton very recently explained why putative  
10 ‘verifications’ by proposed counsel who lack personal knowledge of the asserted facts  
11 are improper and do not carry the TRO applicant’s burden to submit admissible  
12 evidence. *See Hung Huu Anh Hoang v. Kristi Noem et al.*, 5:25-cv-03177-JLS-RAO  
13 (Dec. 4, 2025 order denying TRO) [Dkt. no. 10]. On this threshold fundamental  
14 procedural and substantive basis alone, the TRO Application must be denied.  
15 Preliminary injunctive relief cannot be granted without the moving party establishing the  
16 requisite procedural and evidentiary basis. That was not done here.

17 Petitioner asks that the Respondents be ordered to immediately release him.  
18 Petitioner claims this is required because he cannot be timely removed back to Iran.  
19 Petitioner was taken into ICE custody on June 9, 2025. Since that point, ICE, however,  
20 has been actively working to effectuate his removal from the United States. *Id.*  
21 Petitioner asserts that he is being subjected to indefinite detention because ICE has not  
22 yet obtained a travel document from Iran. However, he has failed to establish that “there  
23 is no significant likelihood of removal in the reasonably foreseeable future.” *Zadvydas v.*  
24 *Davis*, 533 U.S. 678, 701 (2001). The Ninth Circuit has explained that the *Zadvydas*  
25 language requires an alien to show that “he is stuck in a ‘removable-but-unremovable  
26 limbo,’ as the petitioners in *Zadvydas* were[;]” that is, the alien must show he “is  
27 unremovable because the destination country will not accept him or his removal is barred  
28

1 by our own laws.” *Prieto-Romero v. Clark*, 534 F.3d 1053, 1063 (9th Cir. 2008).

2 Here, Petitioner was ordered removed to Iran, his home country. ICE is actively  
3 taking steps to remove him and has undertaken efforts to obtain travel documents.  
4 Petitioner argues he cannot be removed to Iran in a timely manner; however, Iranian  
5 nationals are being removed to Iran. *See, e.g.*, [www.bbc.com/news/articles/cgrql7gd10do](http://www.bbc.com/news/articles/cgrql7gd10do)  
6 (Sept. 30, 2025) (describing agreement for making removals to Iran, and the removals  
7 taking place); also [https://www.latimes.com/world-nation/story/2025-12-08/second-](https://www.latimes.com/world-nation/story/2025-12-08/second-flight-of-iranian-deportees-carrying-55-has-left-u-s-iran-says)  
8 [flight-of-iranian-deportees-carrying-55-has-left-u-s-iran-says](https://www.latimes.com/world-nation/story/2025-12-08/second-flight-of-iranian-deportees-carrying-55-has-left-u-s-iran-says) (Dec. 8, 2025) (describing  
9 deportation flight to Iran).

10 In sum, Petitioner has failed to establish entitlement to immediate release  
11 from ICE custody. The TRO Application should be denied.

## 12 **II. STATEMENT OF FACTS**

13 Petitioner is a native and citizen of Iran who was admitted to the United States as a  
14 lawful permanent resident on July 25, 1986. *See Declaration of Jorge Suarez* (“Suarez  
15 Decl.”), ¶ 5.

16 On or about July 14, 1995, Petitioner was convicted of burglary in violation of  
17 California Penal Code (CPC) §460(b) and possession of forged notes under CPC  
18 §484E(4). ¶ 6. While out on bail Petitioner was convicted of second-degree burger in  
19 violation of CPC §460(b); two counts of forgery in violation of CPC §470; and two  
20 counts of grand theft in violation of CPC §487(a). Petitioner was sentenced concurrently  
21 to seven years in prison. ¶ 6. On or about October 29, 2001, Petitioner was convicted of  
22 second-degree burglary under CPC § 460(b) and sentenced to sixteen months in prison. ¶  
23 7. On or about June 10, 2002 Petitioner violated his parole and was sent back to prison to  
24 finish his sentence. ¶ 8.

25 On or about June 4, 2010, Petitioner’s case in the immigration court was denied  
26 and he was ordered removed to Iran. Petitioner waived his right to appeal this decision. ¶  
27 9.

1 On or about November 13, 2012, Petitioner was convicted in violation of CPC  
2 §666(A)/484(A)/488 of theft and sentenced to two hundred seventy (270) days in jail. ¶  
3 10. On or about February 7, 2014, Petitioner was convicted of burglary in violation of  
4 CPC §459/460(b) and § 470B, possession of a driver’s license with intent to defraud. ¶  
5 11. On or about July 1, 2020, Petitioner was convicted of receiving stolen property in  
6 violation of CPC § 496(A) and sentenced to twenty-four (24) days in jail. ¶ 12.

7 Petitioner was taken into ICE custody on June 9, 2025 to be processed for removal  
8 and served with a Notice of Revocation of Release (See Exhibit A). He has been  
9 detained at Adelanto ICE Processing Center since this date. ¶ 13. On or about July 7,  
10 2025, Ice submitted a travel document to its headquarters for review. ¶ 15. On or about  
11 August 11, 2025, the travel document request was submitted to the Iranian authorities  
12 and remains pending. ¶ 16.

13 The United States government has recently worked to effectuate the removal of  
14 aliens to Iran, and has been successful in removing repeated flights of Iranians. *See, e.g.*,  
15 [www.bbc.com/news/articles/cgrql7gd10do](http://www.bbc.com/news/articles/cgrql7gd10do) (Sept. 30, 2025) (describing agreement for  
16 making removals to Iran and the removals taking place). In that regard, the United States  
17 just recently sent another group of removals to Iran. *See* [https://www.latimes.com/world-  
18 nation/story/2025-12-08/second-flight-of-iranian-deportees-carrying-55-has-left-u-s-  
19 iran-says](https://www.latimes.com/world-nation/story/2025-12-08/second-flight-of-iranian-deportees-carrying-55-has-left-u-s-iran-says) (Dec. 8, 2025) (describing deportation flight to Iran).

### 20 **III. ARGUMENT**

#### 21 **A. The TRO Application Fails to Comply with Local Rule 65-1 and Fails** 22 **to Submit Proper Admissible Evidence**

23 Central District of California Local Civil Rule 65-1 provides that a party seeking a  
24 temporary restraining order “must submit ... a declaration setting forth the facts and  
25 certification required by F.R.Civ.P. 65(b)(1)(A) and (B) ....” Here, the Petition [Dkt. no.  
26 1] and the TRO Application [Dkt. no. 3] contain no declaration and certification. Indeed,  
27 they contain no evidence or testimony. A moving party cannot carry its burden—  
28

1 particularly the heavy burden to establish preliminary injunctive relief—in this manner.  
2 For a proposed attorney to state their belief about the veracity of what their proposed  
3 client allegedly told them over the telephone is no substitute, and it is not a proper basis  
4 for filing a TRO application asking a District Court to issue affirmative injunctive relief  
5 against a defendant. For an order issued recently by the Hon. Judge Klausner denying an  
6 *ex parte* TRO application on this basis, *see Victor Manuel De Jesus Alas v. F. Semaia et*  
7 *al.*, 5:25-cv-02916-RGKL-AJR, Dkt. no. 7 (November 5, 2025 order denying *ex parte*  
8 application for temporary restraining order); *see also Hung Huu Anh Hoang v. Kristi*  
9 *Noem et al.*, 5:25-cv-03177-JLS-RAO (Dec. 4, 2025 order denying TRO) [Dkt. no. 10].

10 Accordingly, the TRO Application must be denied (albeit without prejudice) for  
11 this threshold reason alone. Failure to follow this rule is grounds for denying an  
12 application for a temporary restraining order. *See, e.g., Davis v. Gen. Atomics*, No. 8:23-  
13 cv-00132-JWH-JDE, 2023 WL 10407137, at \*1 (C.D. Cal. Jan. 23, 2023), *appeal*  
14 *dismissed*, No. 24-4740, 2024 WL 4732563 (9th Cir. Oct. 25, 2024) (denying without  
15 prejudice *ex parte* application that did not comply with Local Rule 65-1, including by  
16 failing to include the “required declaration”); *Orozco v. Aguila*, No. 2:22-cv-05526-FWS  
17 (AFMx), 2022 WL 16858524, at \*4 (C.D. Cal. Sept. 16, 2022) (“[T]he failure of the  
18 Application and supporting documents to satisfy Rule 65’s and Local Rule 65-1’s notice  
19 requirements, in addition to the presentation of an unsigned declaration to demonstrate  
20 notice . . . suggests sufficient grounds to deny the Application.”); *see also, United States*  
21 *v. Biden*, No. 2:23-CR-00599-MCS-1, 2024 WL 3891843, at \*1 (C.D. Cal. June 10,  
22 2024) (striking TRO application for failure to comply with Local Rule 65-1); *Christian*  
23 *v. Mattel, Inc.*, 286 F.3d 1118, 1129 (9th Cir. 2002) (affirming district court’s  
24 enforcement of local rules and noting, “[t]he district court has considerable latitude in  
25 managing the parties’ motion practice and enforcing local rules that place parameters on  
26 briefing”).

1           **B.     Petitioner Has Not Shown That There Is No Significant Likelihood Of**  
2                           **Removal In The Reasonable Future.**

3           The TRO Application should be denied because it fails to show that there is no  
4 significant likelihood of removal in the reasonably foreseeable future, as required by  
5 *Zadvydas v. Davis*, 533 U.S. 678 (2001). In *Zadvydas*, the Supreme Court held that an  
6 alien is not entitled to habeas relief, after a post-removal detention period of six months,  
7 unless the alien can show that there is “good reason to believe that there is no  
8 significant likelihood of removal in the reasonably foreseeable future.” 533 U.S. at 701;  
9 *see also Bonilla-Montano v. Holder*, 2010 WL 1727803 (C.D. Cal. Mar. 25, 2010) (M.J.  
10 Abrams) (discussing *Zadvydas* and recommending denial of petition for writ of habeas  
11 corpus), *adopted* 2010 WL 1727808 (C.D. Cal. April 26, 2010). The Ninth Circuit has  
12 explained that under *Zadvydas*, an alien must show that “he is stuck in a ‘removable-  
13 but-unremovable limbo.” *Prieto-Romero v. Clark*, 534 F.3d 1053, 1063 (9th Cir. 2008).  
14 This means that the alien must show he “is unremovable because the destination  
15 country will not accept him or his removal is barred by our own laws.” *Id.* If the alien  
16 meets this burden, the United States must respond with sufficient rebuttal evidence. *See*  
17 *Zadvydas*, 533 U.S. at 701.

18           While Petitioner has been detained for almost exactly six months pursuant to a  
19 final order of removal, the six-month presumption established by the Supreme Court in  
20 *Zadvydas* just shifts the evidentiary burden:

21  
22           After this 6–month period, once the alien provides good reason to believe  
23 that there is no significant likelihood of removal in the reasonably  
24 foreseeable future, the Government must respond with evidence sufficient  
25 to rebut that showing. And for detention to remain reasonable, as the period  
26 of prior postremoval confinement grows, what counts as the “reasonably  
27 foreseeable future” conversely would have to shrink. This 6–month  
28 presumption, of course, does not mean that every alien not removed must  
be released after six months. To the contrary, an alien may be held in

1 confinement until it has been determined that there is no significant  
2 likelihood of removal in the reasonably foreseeable future.

3 *Zadvydas*, 533 U.S. at 701. Thus the noncitizen “may be held in  
4 confinement until it has been determined that there is *no significant likelihood of*  
5 *removal in the reasonably foreseeable future.*” *Id.* (italic emphasis added).

6 Here, the government formally requested Petitioner’s travel documents  
7 from Iran on August 11, 2025. *See* Suarez Decl., ¶ 16. Courts properly deny *Zadvydas*  
8 claims under such circumstances. *See Malkandi v. Mukasey*, 2008 WL 916974, at \*1  
9 (W.D. Wash. Apr. 2, 2008) (Martinez, J.) (denying *Zadvydas* petition where petitioner  
10 had been detained more than 14 months post-final order); *Nicia v. ICE Field Off. Dir.*,  
11 2013 WL2319402, at \*3 (W.D. Wash. May 28, 2013) (Martinez, J.) (holding petitioner  
12 “failed to satisfy his burden of showing that there is no significant likelihood of his  
13 removal in the reasonably foreseeable future” where he had been detained more than  
14 seven months post-final order). That Petitioner does not yet have a specific date of  
15 anticipated removal does not make his detention indefinite. *See Diouf v. Mukasey*, 542  
16 F.3d 1222, 1233 (9th Cir. 2008) (where there is no evidence that the country of  
17 removal would refuse to accept the petitioner or that removal is barred by the laws of  
18 the United States, that the detention did not have a certain end date did not demonstrate  
19 that detention was “indefinite”).

20 Petitioner has not shown that the government of Iran will not issue a travel  
21 document for him, or that there are any insurmountable barriers precluding his removal.  
22 More generally, there are no institutional barriers to removing Petitioner to Iran. ICE  
23 has successfully removed aliens to Iran recently. Consequently, Petitioner’s continued  
24 detention is permissible.

25 **C. Petitioner Has Not Made The Requisite Showing To Shift The Burden**  
26 **Of Proof To The United States.**

27 Petitioner argues he should not be detained, despite conceding he has a final  
28

1 removal order. But the INA governs the detention and release of noncitizens during and  
2 following their removal proceedings. *See Johnson v. Guzman Chavez*, 594 U.S. 523, 527  
3 (2021). The INA does not provide for a pre-detention hearing. *See, e.g., 8 U.S.C. § 1231.*  
4 When a noncitizen receives a final removal order, their detention is mandatory for the  
5 following 90 days. 8 U.S.C. § 1231(a)(2). After that time, detention is within ICE’s  
6 discretion under 8 U.S.C. § 1231(a)(6). The government is thus broadly authorized to  
7 exercise its discretion to revoke release under this authority pursuant to 8 CFR §  
8 241.1(l)(1), and 8 CFR § 241.4(l)(2). *See Moran v. U.S. Dep’t of Homeland Sec.*, 2020  
9 WL 6083445, at \*9 (C.D. Cal. Aug. 21, 2020) (dismissing petitioners’ claim that § 241.4(l)  
10 was a violation of their procedural due process rights and noting, “[Petitioners] fail to point  
11 to any constitutional, statutory, or regulatory authority to support their contention that they  
12 have a protected interest in remaining at liberty in the United States while they have  
13 valid removal orders.”).

14           Petitioner fails to establish any deficiency in release revocation procedure. Even if  
15 he had, the appropriate injunctive remedy for any procedural deficiency would not be  
16 automatic release from custody, but rather to remedy the specific procedural deficiency.  
17 *In Ahmad v. Whitaker*, for example, the government revoked the petitioner’s release but  
18 did not provide him an informal interview. *Ahmad v. Whitaker*, 2018 WL 6928540, at \*6  
19 (W.D. Wash. Dec. 4, 2018), *rep. & rec. adopted*, 2019 WL 95571 (W.D. Wash. Jan. 3,  
20 2019). The petitioner argued his release revocation was unlawful. In rejecting his claim,  
21 the court held that although the regulations called for an informal interview, petitioner  
22 could not establish “any actionable injury from this violation of the regulations” because  
23 the government had procured a travel document for the petitioner, and his removable  
24 was reasonably foreseeable. *Id.* Similarly, in *Doe v. Smith*, the U.S. District Court for the  
25 District of Massachusetts held that even if the ICE detainee petitioner had not received a  
26 timely interview following her return to custody, there was “no apparent reason why a  
27

1 violation of the regulation ... should result in release.” *Doe v. Smith*, 2018 WL 4696748,  
2 at \*9 (D. Mass. Oct. 1, 2018). The court elaborated, “[I]t is difficult to see an actionable  
3 injury stemming from such a violation. Doe is not challenging the underlying  
4 justification for the removal order.... Nor is this a situation where a prompt interview  
5 might have led to her immediate release—for example, a case of mistaken identity.” *Id.*

6 The Hon. Judge Blumenfeld recently denied a preliminary injunction motion in a  
7 somewhat similar case alleging a lack of sufficient re-detention process, noting that the  
8 evidentiary burden had not been met, and also that it was unclear that release would be  
9 the appropriate remedy for any violations of revocation procedure. *See Long Ton v.*  
10 *Kristi Noem, et al.*, 5:25-cv-02033-SB-AGR [Dkt. no. 17] (September 3, 2025). The  
11 Hon. Judge Birotte Jr. likewise denied a TRO asserting a re-detention procedure  
12 challenge. *See Jose Angel Morales Sanchez v. Pam Bondi, et al.*, 5:25-cv-02530-AB-  
13 DTB [Dkt. no. 12] (October 3, 2025 order denying TRO). The Court noted that  
14 “[p]etitioner has not produced evidence showing that the SDDO lacked authority to  
15 revoke supervision or that ICE’s procedures were fundamentally flawed. Even more, the  
16 absence of additional details regarding the identity of the SDDO or a formal interview,  
17 while potentially imperfect under the regulations, does not negate the statutory authority  
18 provided by § 1231(a)(2)–(6).”

19 Petitioner has not shown a deficiency in his release revocation, nor that such a  
20 deficiency would warrant ordering his immediate release from detention.

#### 21 **IV. CONCLUSION**

22 The Federal Respondents respectfully request that the Court deny the TRO  
23 application. It is procedurally defective, and the Petitioner has not met his burden to  
24 establish that there is no significant likelihood of removal in the reasonably foreseeable  
25 future.  
26

1 Dated: December 11, 2025

Respectfully submitted,

2 TODD BLANCHE  
3 Deputy Attorney General  
4 BILAL A. ESSAYLI  
5 First Assistant United States Attorney  
6 DAVID M. HARRIS  
7 Assistant United States Attorney  
8 Chief, Civil Division  
9 DANIEL A. BECK  
10 Assistant United States Attorney  
11 Chief, Complex and Defensive Litigation Section

*/s/ Karen E. Smith*

12 Karen E. Smith  
13 Special Assistant United States Attorney

14 Attorneys for Federal Respondents

15  
16 **CERTIFICATE OF COMPLIANCE WITH L.R. 11-6.2**

17 The undersigned, counsel of record for Respondents, certifies that the  
18 memorandum of points and authorities contains 2453 words, which complies with the  
19 word limit of L.R. 11-6.1.

20 Dated: December 11, 2025

*/s/ Karen E. Smith*

21 Karen E. Smith  
22 Special Assistant United States Attorney

**DECLARATION OF JORGE SUAREZ**

I, Jorge Suarez, do hereby declare and state as follows:

1. I am employed as a Deportation Officer (“DO”) by the U.S. Department of Homeland Security (“DHS”), U.S. Immigration and Customs Enforcement (“ICE”), Office of Enforcement and Removal Operations (“ERO”). I am currently assigned to the Adelanto Sub-office in Adelanto, California, under the ERO Los Angeles Field Office.

2. I have been employed by DHS since November 2017. The facts in this declaration are based on my personal and professional knowledge, consultation with other ICE personnel, and review of official documents and records maintained by DHS and other relevant sources obtained during the regular course of business.

3. My responsibilities as DO include the review of detained alien cases. As part of my duties, I reviewed the case of Hossein Joudi-Haghighi (JOUDI-HAGHIGHI).

4. The Petitioner, JOUDI-HAGHIGHI is a native and citizen of Iran.

5. On or about July 25, 1986, JOUDI-HAGHIGHI was admitted to the United States as a lawful permanent resident.

6. On or about July 14, 1995, JOUDI-HAGHIGHI was convicted of burglary in violation of section 460(b) of the California Penal Code (CPC), grand theft of an access card in violation of CPC § 484E (4), possession of forged notes in violation of CPC § 475. JOUDI-HAGHIGHI was also convicted of two counts of second-degree burglary while out on bail/recognizance in violation of CPC § 460(b), two counts of forgery in violation of CPC § 470, and two counts of grand theft in violation of CPC § 487(a). For these offenses, he was sentenced concurrently to 7 years in prison.

7. On or about October 29, 2001, JOUDI-HAGHIGHI was convicted of second-degree burglary in violation of CPC § 460(b) and sentenced to 16 months in prison.

8. On or about June 10, 2002, JOUDI-HAGHIGHI violated his parole and was sent back to prison to finish his term.

1 9. On or about June 4, 2010, an Immigration Judge denied all relief and  
2 ordered JOUDI-HAGHIGHI removed to Iran. JOUDI-HAGHIGHI waived appeal of  
3 this decision, and his removal became final.

4 10. On or about November 13, 2012, JOUDI-HAGHIGHI was convicted of theft  
5 in violation of CPC § 666(A)/484(A)/488 and sentenced to 270 days jail.

6 11. On or about February 7, 2014, JOUDI-HAGHIGHI was convicted of  
7 burglary in violation of CPC § 459/460(b), possession of driver's license to defraud in  
8 violation of CPC § 470B, and appropriating lost property in violation of CPC § 485.

9 12. On or about July 1, 2020, JOUDI-HAGHIGHI was convicted of receiving  
10 stolen property in violation of CPC § 496(A) and sentenced to 24 days in jail.

11 13. JOUDI-HAGHIGHI was taken into ICE custody on or about June 9, 2025 for  
12 removal and is currently detained at the Adelanto ICE Processing Center.

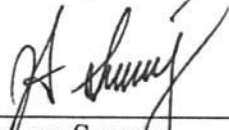
13 14. On June 9, 2025, JOUDI-HAGHIGHI was served with a Notice of  
14 Revocation of Release. Attached hereto as Exhibit A is a true and correct copy of the  
15 Notice of Revocation of Release.

16 15. On or about July 7, 2025, ICE submitted a request for a travel document to  
17 its ERO-HQ division for review.

18 16. On or about August 11, 2025, a travel document request was submitted to  
19 Iranian authorities and remains pending.

20  
21 I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury under the laws of the  
22 United States that the foregoing is true and correct.

23 Executed on December 11, 2025, at Adelanto, California.

24  
25   
26 \_\_\_\_\_  
27 Jorge Suarez  
28 Deportation Officer  
DHS/ICE/ERO  
Los Angeles Field Office  
Adelanto, California

# EXHIBIT A

Office of Enforcement and Removal Operations  
Los Angeles Field Office

U.S. Department of Homeland Security  
34 Civic Center Plaza  
Santa Ana, CA 92701



ENFORCEMENT  
AND CUSTOMS  
U.S. IMMIGRATION

Joudi-Haghighi, Hossein  
c/o Santa Ana Federal Building  
34 Civic Center Plaza  
Santa Ana, CA 92701




### Notice of Revocation of Release

This letter is to inform you that your case has been reviewed, and it has been determined that you will be kept in the custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has been made based on a review of your immigration and criminal history.

Based on the above, and pursuant to 8 CFR 241.4, you are to remain in ICE custody at this time.

You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 USC Section 1253(a).

  
SDDO  
Signature and Title of Authorized Official

6/09/2025  
Date

Notice of Revocation of Release  
Joudi-Haghighi, Hossein A#( [REDACTED]

**PROOF OF SERVICE**

**(1) Personal Service (Officer to complete both (a) and (b) below.)**

(a) I A. ABDELMUTI, DEPORTATION OFFICER,  
Name of ICE Officer Title  
certify that I served Joudi-Haghighi, Hossein with a copy of  
Name of detainee  
this document at SANTA ANA FEDERAL BUILDING on 06/09/2025, at 03:30 PM.  
Institution Date Time

(b) I certify that I served the custodian \_\_\_\_\_,  
Name of Official  
\_\_\_\_\_, at \_\_\_\_\_, on \_\_\_\_\_,  
Title Institution  
\_\_\_\_\_ with a copy of this document.  
Date

**OR**

**(2) Service by certified mail, return receipt. (Attach copy of receipt)**

I \_\_\_\_\_, \_\_\_\_\_, certify  
Name of ICE Officer Title  
that I served \_\_\_\_\_ and the custodian \_\_\_\_\_,  
Name of detainee Name of Official  
with a copy of this document by certified mail at \_\_\_\_\_ on \_\_\_\_\_.  
Institution Date

( ) cc: Attorney of Record or Designated Representative  
(X) cc: A-File