

1 Stacy Tolchin (CA SBN #217431)
2 *Email: Stacy@Tolchinimmigration.com*
3 Law Offices of Stacy Tolchin
4 776 E. Green St., Suite 210
5 Pasadena, CA 91101
6 Telephone: (213) 622-7450
7 Facsimile: (213) 622-7233

8 Counsel for Petitioner

9
10 **UNITED STATES DISTRICT COURT FOR THE**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 Tirhas Zedingle,
13
14 Petitioner,
15
16 v.

17 Kristi Noem, Secretary, Department of
18 Homeland Security; Todd Lyons, in his
19 Official Capacity as Acting Director of U.S.
20 Immigration and Customs Enforcement (Ice);
21 Pam Bondi, Attorney General of the United
22 States; Gregory J. Archambeault, Director,
23 San Diego Field Office, Immigration and
24 Customs Enforcement; Christopher J. Larose,
25 Warden, Otay Mesa Detention Center.

26 Respondents.

No. 3:26-cv-00100-DMS-SBC

DECLARATION OF STACY
TOLCHIN

Immigration Case

1 I, Stacy Tolchin, hereby declare and state the following:

- 2 1. My business address is Law Offices of Stacy Tolchin, 776 E. Green St.
3 Suite 210, Pasadena, CA 91101.
- 4 2. I have personal knowledge of the events described below.
- 5 3. I represent Petitioner before this Court.
- 6 5. Attached as **Exhibit A** is Petitioner's detention status.
- 7 6. Attached as **Exhibit B** is Petitioner's declaration.
- 8 7. Attached as **Exhibit C** is a copy of Petitioner's employment authorization
9 document, showing a code of (c)(18), which is for an order of supervision.
- 10 8. Attached as **Exhibit D** is the order of removal from the immigration judge.
- 11 9. Attached as **Exhibit E** are letters from Petitioner's family members.

12

13 I declare under penalty of perjury of the laws of the United States that the
14 above information is true and correct to the best of my knowledge. Executed this 8th
15 day of January 2026 at Pasadena, CA.

16

17 S/Stacy Tolchin

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19 Law Offices of Stacy Tolchin
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21 Pasadena, CA 91101
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23 Facsimile: (213) 622-7233
24 Email: Stacy@Tolchinimmigration.com
25 Counsel for Petitioner
26
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EXHIBIT A



Report

Main Menu

Search Results: 1

TIRHAS TEKLE ZEDINGLE

Country of Birth : Eritrea

A-Number: [REDACTED]

Status : In ICE Custody

State: CA

Current Detention Facility: OTAY MESA DETENTION CENTER

** Click on the Detention Facility name to obtain facility contact information*

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 - ICE ERO Field Offices
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EXHIBIT B

DECLARATION OF TIRHAS ZEDINGL

I, Tirhas Zedingl, declare as follows:

1. I was born in Eritrea in 1966.
2. I was ordered removed to Ethiopia on March 27, 2002 and was released in 2002 because I could not be removed. I believe that I was held for more than 180 days.
3. I reported regularly every year with DHS on an order of supervision and did not violate terms.
4. I was arrested on October 4, 2025 when I went to report to immigration on the order of supervision.
5. I am not from Ethiopia so I cannot be removed to there because I am from Eritrea.
6. I do not believe that I can be removed to Eritrea because Eritrea is not accepting people.
7. I have three U.S. citizen children, a son, 27 and two daughters, 29 and 28 and a U.S. Citizen husband.
8. I have no family left in Eritrea.
9. I am a diabetic, and was just recently while in the hospital for three days and the end of 2025 because I thought I had a stroke, but was told it was not.
10. My face shifted from whatever happened to me medically.
11. My three children and my husband are very worried about me. My daughter is currently pregnant and she is taking it really hard so I tell her to focus on herself and baby so that there aren't any complications for her.
12. My detention is affecting my 80 year old mother as well, it is affecting them all emotionally to visit me every Saturday. The entire family visits as we are very close. My detention is really tearing us apart.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

1-7-26
Date


TIRHAS TEKLE ZEDINGLE