

1 ADAM GORDON
United States Attorney
2 HUNTER V. NORTON
Assistant U.S. Attorney
3 Washington D.C. Bar No. 1780736
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Telephone: (619) 546-8592
Facsimile: (619) 546-7751
6 Email: Hunter.Norton2@usdoj.gov

7 Attorneys for Respondents

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 IDRISS ZAKARIA ISSA,

11 Petitioner,

12 v.

13 MARKWAYNE MULLIN, Secretary,
14 Department of Homeland Security, *et al.*,

15 Respondents.

Case No.: 26-cv-02117-BJC-DDL

SUPPLPEMENTAL DOCUMENTS

16
17 Respondents provide the following Exhibits in support of Respondents' Return
18 filed at ECF No. 6.

19 DATED: April 30, 2026

Respectfully submitted,

20
21 ADAM GORDON
United States Attorney

22
23 s/ Hunter V. Norton
HUNTER V. NORTON
24 Assistant United States Attorney
25 Attorneys for Respondents
26
27
28

EXHIBIT 1

Office of Enforcement and Removal Operations
U.S. Department of Homeland Security
1564 Gateway Road
Calexico, Ca 92231



U.S. Immigration
and Customs
Enforcement

Zakaria Issa Idriss

~~██████████~~
c/o Immigration and Customs Enforcement
1564 Gateway Road
Calexico, CA 92231

Notice of Failure to Comply Pursuant to 8 CFR 241.4(g)

This letter is to inform you that your custody status has been reviewed, and it has been determined that you will not be released from the custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has been made based on a review of your file and/or your personal interview and consideration of any information you submitted to ICE's reviewing officials. On March 18, 2026, you were advised, via Deportation Officer, of specific requirements to complete and were given 30 days to comply with your obligation to assist in obtaining a travel document. The burden to obtain a travel document for your removal does not solely rest with ICE. Pursuant to Section 241(a)(1)(C) of the Immigration and Nationality Act (INA), you are required to make timely and good faith efforts to obtain travel or other documents necessary for your removal from the United States. If you fail to make these efforts, Section 241(a)(1)(C) allows for the extension of the removal period. As you have failed to fill out and submit the proper travel document application, you have failed to comply with your obligation and are acting to prevent your removal from the United States. The removal period is therefore extended in your case. As you are still within the removal period, you are to remain in ICE custody until you 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. You are also advised that continued 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).

██████████
MIRANDA

Digitally signed by ██████████
MIRANDA
Date: 2026.03.18 14:02:50 -0700

██████████ Miranda, (A)Assistant Field Office Director, San Diego, CA.

_____ Date

Notice of Failure to Comply Pursuant to 8 CFR 241.4(g)
221 395 322 Zakaria Issa, Idriss
Page 2

PROOF OF SERVICE

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

(a) I ██████████ Gonzalez, Deportation Officer,
Name of ICE Officer/Title
certify that I served Zakaria Issa, Idriss with a copy of
Name of detainee
this document at Imperial Regional Detention Facility on March 18, 2026, at 1500.
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
- () cc: A-File

EXHIBIT 2

U.S. Department of Homeland Security

Subject ID: [REDACTED]

Record of Deportable/Inadmissible Alien

Family Name (CAPS) ZAKARIA ISSA, IDRIS		First	Middle	
Country of Citizenship SUDAN	Passport Number and Country of Issue	File Number CASE No. [REDACTED]		
U.S. Address IN DHS CUSTODY				
Date, Place, Time, and Manner of Last Entry 03/09/2025, 0100, 5.25 mile(s) W of TEC, PWA (Afoot)		Passenger Boarded at		
Number, Street, City, Province (State) and Country of Permanent Residence SUDAN, SUDAN				
Date of Birth [REDACTED]	Age: 35	Date of Action 03/09/2025	Location Code SDC/BRF	
City, Province (State) and Country of Birth SUDAN, SUDAN, SUDAN		AR <input checked="" type="checkbox"/> Form : (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>		
NIV Issuing Post and NIV Number		Social Security Account Name		
Date Visa Issued		Social Security Number		
Immigration Record NEGATIVE		Criminal Record None Known		
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)			Number and Nationality of Minor Children	
Father's Name, Nationality, and Address, if Known See Narrative		Mother's Present and Maiden Names, Nationality, and Address, if Known See Narrative		
Monies Due/Property in U.S. Not in Immediate Possession None Claimed	Fingerprinted? <input type="checkbox"/> Yes <input type="checkbox"/> No	Systems Checks See Narrative	Charge Code Words(s) I7A1	
Name and Address of (Last)(Current) U.S. Employer	Type of Employment	Salary	Employed from/to Hr	
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.) FINS #: [REDACTED] I77 #: [REDACTED]				
212(f) PROCLAMATION				
ARREST COORDINATES: ----- Latitude: 32.60802 Longitude: -116.69993				
CONSEQUENCE DELIVERY SYSTEM: ----- Classification: FIRA				
Program: PRO		[REDACTED] REED Date: 2025.03.09 16:23:31 -07:00 0381832881.CBP Border Patrol Agent (Signature and Title of Immigration Officer)		
Alien has been advised of communication privileges		[REDACTED] REED Date: 2025.03.09 16:23:05 -07:00 0381832881.CBP 03/09/2025 (Date/Initials)		
Distribution:		Received: (Subject and Documents) (Report of Interview)		
		Officer: [REDACTED] REED on: March 09, 2025 at 1910 (time) Disposition: Expedited Removal - Per 212 (F) Examining Officer: [REDACTED] (A)Supervisory Border Patrol Agent		

U.S. Department of Homeland Security

Continuation Page for Form I213

Alien's Name ZAKARIA ISSA, IDRIS	File Number [REDACTED] Event No: [REDACTED]	Date 03/09/2025
-------------------------------------	---	--------------------

FATHER NAME AND ADDRESS:

Nationality: [REDACTED]

MOTHER NAME AND ADDRESS:

Nationality: [REDACTED]

RECORDS CHECKED:

- CIS Negative
- ABIS Positive
- EARM Negative
- NCIC Negative
- NGI Positive
- TECS Negative

Other Family/Associates Not in Event:

Father, [REDACTED]
Mother, [REDACTED]

NARRATIVE:

IMMIGRATION HISTORY:
 Number of VRs: See records
 Number of Removals: See records
 Last Removal Date and Place: N/A

CRIMINAL HISTORY:
See records

ENCOUNTER:

Border Patrol Agent (BPA) [REDACTED] Luna encountered Idriss ZAKARIA ISSA [REDACTED], a citizen of Sudan, [REDACTED] on 03/09/2025 at approximately 09:13 AM near DULZURA, CA. The apprehending agent then determined that ZAKARIA ISSA had unlawfully entered the United States of America near TECATE, CA from Mexico at a time and place other than as designated by the Secretary of Homeland Security. ZAKARIA ISSA was apprehended within a group of 2 individuals.




After determining that ZAKARIA ISSA was an alien who illegally entered the United States of

Signature [REDACTED] REED Date: 2025.03.09 16:23:35 -07:00 0381832881.CBP	Title Border Patrol Agent
--	------------------------------

U.S. Department of Homeland Security

Continuation Page for Form

I213

Alien's Name ZAKARIA ISSA, IDRIS	File Number  Event No: 	Date 03/09/2025
<p>America, ZAKARIA ISSA was arrested and transported to the San Diego Central Processing Center (SAN DIEGO, CA) for further processing using the e3/IDENT and Next Generation Identification (NGI) Systems.</p> <p>IMMIGRATION VIOLATION: At the San Diego Central Processing Center, ZAKARIA ISSA stated that they are a citizen and national of Sudan without the necessary legal documents to enter, pass through, or remain in the United States. ZAKARIA ISSA illegally crossed the international boundary on 03/09/2025 at approximately 01:00 AM near TECATE, CA without being inspected by an immigration officer at a designated Port of Entry.</p> <p>CONSULAR NOTIFICATION: ZAKARIA ISSA was notified of their right to communicate with a Consular Officer from their country as per Article 36(1)(b) of the Vienna convention on Consular Relations.</p> <p>DISPOSITION/ADDITIONAL INFORMATION: ZAKARIA ISSA was served with DHS forms I-860 and I-296. ZAKARIA ISSA is being held in Department of Homeland Security custody pending removal proceedings as an Expedited Removal as per Section 235(b)(1) of the INA. ZAKARIA ISSA was apprehended within fourteen days of their last entry into the United States, and within 100 air miles of any United States land border.</p> <p>ZAKARIA ISSA made an unlawful entry into the United States during the suspension of and limitation on entry described in the Presidential Proclamation, Guaranteeing the States Against Invasion under INA 212(f). ZAKARIA ISSA does not qualify for an exception to the Proclamation. ZAKARIA ISSA will be processed for Expedited Removal under the provisions of 8 C.F.R. 235.15. ZAKARIA ISSA was given a list of free legal services.</p> <p>ZAKARIA ISSA will be removed at a time, place and in a manner consistent with removal proceedings for a citizen of their designated country of removal.</p> <p>Based on the information provided ZAKARIA ISSA does not derive or acquire U.S. citizenship.</p> <p>UNITED STATES POINT OF CONTACT INFORMATION: Point of contact name not provided IN DHS CUSTODY Point of contact phone number not provided</p>		
Signature  REED Date: 2025.03.09 16:23:39 -0700 0381832881.CBP	Title Border Patrol Agent	

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name ZAKARIA ISSA, IDRIS	File Number [REDACTED]	Date 03/09/2025
Event No: [REDACTED]		

at approximately 01:00 AM near TECATE, CA without being inspected by an immigration officer at a designated Port of Entry.

CONSULAR NOTIFICATION:

ZAKARIA ISSA was notified of their right to communicate with a Consular Officer from their country as per Article 36(1)(b) of the Vienna convention on Consular Relations.

DISPOSITION/ADDITIONAL INFORMATION:

ZAKARIA ISSA was served with DHS forms I-860 and I-296. ZAKARIA ISSA is being held in Department of Homeland Security custody pending removal proceedings as an Expedited Removal as per Section 235(b)(1) of the INA. ZAKARIA ISSA was apprehended within fourteen days of their last entry into the United States, and within 100 air miles of any United States land border.

ZAKARIA ISSA made an unlawful entry into the United States during the suspension of and limitation on entry described in the Presidential Proclamation, Guaranteeing the States Against Invasion under INA 212(f). ZAKARIA ISSA does not qualify for an exception to the Proclamation. ZAKARIA ISSA will be processed for Expedited Removal under the provisions of 8 C.F.R. 235.15. ZAKARIA ISSA was given a list of free legal services.

ZAKARIA ISSA will be removed at a time, place and in a manner consistent with removal proceedings for a citizen of their designated country of removal.

Based on the information provided ZAKARIA ISSA does not derive or acquire U.S. citizenship.

UNITED STATES POINT OF CONTACT INFORMATION:

Point of contact name not provided


IN DHS CUSTODY

Point of contact phone number not provided

Other Identifying Numbers

ALIEN- [REDACTED]

ADDENDUM: On 04/01/2025, subject claimed fear/torture of returning to their COC.

Signature [REDACTED] REED		Title Border Patrol Agent
------------------------------	---	------------------------------

Handwritten initials

U.S. Department of Homeland Security

MEMORANDUM OF INVESTIGATION

File Number [REDACTED]	Title: IDRISS ZAKARIA ISSA	Control Office SND/OTM
---------------------------	-------------------------------	---------------------------

On March 9, 2025 U.S. Border Patrol (USBP) encountered and arrested Zakaria Issa, Idriss.

Zakaria is being processed pursuant to the Jan 20, 2025, proclamation implementing INA 212(f) and/or 21S(a);

On March 10, 2025, USBP transferred Zakaria to ERO custody at the Otay Mesa Detention Center (OMDC).

Zakaria has manifested a fear of torture if returned to her country of origin.

Zakaria will be referred to USCIS for a Convention Against Torture (CAT) Assessment.

Zakaria is a citizen and national of Sudan.

Zakaria designated country of removal is Sudan.

Zakaria Issa, Idriss made an unlawful entry into the United States during the suspension of and limitation on entry described in the Presidential Proclamation, Guaranteeing the States Against Invasion under INA 212(f).

The alien is being processed pursuant to the Jan 20, 2025, proclamation implementing INA 212(f).

The alien has manifested a fear of torture and is being referred to USCIS for a CAT assessment.

The alien's designated country of removal is Sudan.

Investigator [REDACTED]	<i>Martinez</i>	Date 04/03/2025
----------------------------	-----------------	--------------------