

1 ADAM GORDON
United States Attorney
2 HUNTER V. NORTON
Assistant United States Attorney
3 Washington, D.C. Bar No. 1780736
DANIELLE L. BROWN
4 Special Assistant United States Attorney
Colorado State Bar No. 57814
5 Office of the U.S. Attorney
880 Front Street, Room 6293
6 San Diego, CA 92101-8893
Telephone: 619-546-8693
7 Email: Hunter.Norton2@usdoj.gov
Email: Danielle.Brown2@usdoj.gov
8

9 Attorneys for Respondents

10
11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA

13 MOHAMMAD REZA KARIMI,

14
15 Petitioner,

16 v.

17 MARKWAYNE MULLIN, *Secretary,*
18 *Department of Homeland Security, et al.,*

19 Respondents.
20
21
22

Case No.: 26-cv-02539-BAS-AHG

**RETURN TO PETITION FOR
WRIT OF HABEAS CORPUS**

23 Respondents, by and through counsel, hereby respond to the Petition for Writ of
24 Habeas Corpus. Undersigned counsel is unable to ascertain sufficient facts at this time to
25 establish that Petitioner's supervised release was revoked according to the procedures
26 established by law. Respondents therefore acknowledge that Petitioner is entitled to be
27 released from custody subject to conditions of supervision. *See* 8 U.S.C. § 1231(a)(3); 8
28 C.F.R. § 241.13(h)(1); *Ba v. Lyons*, No. 25-cv-2871-CAB-BJW, 2026 WL 218936, at *1

1 (S.D. Cal. Jan. 27, 2026) (“The habeas statute does not empower courts to manage ICE
2 supervision programs.”) (citing 28 U.S.C. § 2241(c)(3)); *Khachikian v. Casey*, No. 25-
3 cv-3737-GPC-JLB, ECF No. 13 (S.D. Cal. Jan. 13, 2026) (“Ultimately, ICE has
4 discretion to impose conditions on release.”).

5 DATED: April 28, 2026

ADAM GORDON
United States Attorney

7
8 *s/Danielle L. Brown*
DANIELLE L. BROWN
Special Assistant United States Attorney

10 Attorneys for the Respondents
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28