UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IRANIAN AMERICAN LEGAL DEFENSE FUND, *Plaintiff*, v. MARCO RUBIO, in his official capacity as Secretary of State, et al., *Defendants*.	Civil Action No. 26-2375-ACR

PLAINTIFF'S PRE-HEARING SUBMISSIONS

The Court has set a hearing for October 15, 2026, to (1) hear testimony on Plaintiff's motion for a stay under 5 U.S.C. § 705 and for a preliminary injunction, *see* ECF No. 9; (2) consider Plaintiff's emergency motion for expedited discovery, *see* ECF No. 31; and (3) conduct a pre-motion conference on Defendants' anticipated motion to dismiss, *see* ECF No. 37. Plaintiff Iranian American Legal Defense Fund (IALDF) provides the following information and attached materials in anticipation of the evidentiary hearing. For the other matters, Plaintiff relies on the documents that were previously filed.

BACKGROUND

IALDF brought this action under the Administrative Procedure Act (APA) seeking vacatur of Defendants' policy of providing the Iranian government information about Iranian asylum seekers that is protected by 8 C.F.R. §§ 208.6 and 236.1(e), *see* Compl., ECF No. 1, and moved for a stay and for a preliminary injunction, *see* ECF No. 9. Initially, IALDF based its allegation that Defendants have such a policy on (1) declarations from Iranian asylum seekers whose confidential information had been shared with the Iranian government, *see* Rahnama Decl. B,

ECF Nos. 9-4, 9-5; (2) a declaration from Cyrus Mehri describing conversations in which a Senior Official from the Iranian Interest Section told him that, since a meeting at the State Department in March 2025, the United States has been providing the Iranian government with detained Iranians' immigration files, including confidential asylum information, *see* Mehri Decl., ECF No. 9-6; and (3) two New York Times articles that quote an Iranian official who had information about the asylum status of Iranian deportees, *see* Farnaz Fassihi & Hamed Aleaziz, *U.S. Deports Planeload of Iranians After Deal With Tehran, Officials Say*, N.Y. Times, ECF No. 9-15; Farnaz Fassihi, *U.S. Deports Second Planeload of Iranians, Officials Say*, N.Y. Times, ECF No. 9-16.

Defendants denied that the policy exists based solely on a single ICE official's declaration that DHS does not have an agreement with the government of Iran to provide it with protected information. *See* Adams Decl., ECF No. 23-2, ¶ 14. The Adams declaration says nothing about whether the State Department has such an agreement, and it is silent as to whether any Defendant has a policy of providing such information to the Iranian government.

On August 5, 2026, the Court held a hearing on IALDF's motion and concluded that it needed more information as to whether the challenged policy exists before it could rule on the motion for preliminary relief. *See* Hrg. Tr., ECF No. 29, at 42:4–6. Specifically, the Court asked for information regarding:

(1) whether the United States government and the Iranian Interests Section have continued to communicate regarding removals since the beginning of Operation Epic Fury in February 2026, *id.* at 4:5–5:8, 6:4–7, 47:24–48:15;

(2) whether Iranians are being removed to third countries, *id.* at 5:19–23, 48:1–2;

(3) whether the quantity of impairment to IALDF's ability to serve its clients is sufficient to establish organizational standing, *id.* at 16:5–22, 21:15–18;

(4) what Mr. Adams did to investigate the claims and come up with the assertions in his declaration, *id.* at 29:5–24, including whether he spoke to the DHS agents who provided files to the Iranian Interests Section to find out what was transmitted, *id.* at 30:18–22, whether he assessed the information transferred between DHS and the Iranian Interests Section, *id.* at 30:35–31:3; and who he spoke to regarding the detention center visits by Iranian officials, *id.* at 31:12–15;

(5) whether there was a meeting in March of 2025 between DHS or the State Department and the Iranian Interests Section about removals and who participated in it, *id.* at 45:20–23, 46:15–19; and

(6) whether the sharing of confidential information was sufficiently widespread that it amounted to a policy, *id.* at 40:9–41:11.

The Court ordered that Mr. Adams appear live to testify at the hearing, *id.* at 49:10–11, encouraged Plaintiff to seek the appearance and testimony of the Senior Official of the Iranian Interests Section referred to in the First Mehri Declaration, *id.* at 46:24–47:5, and stated that Plaintiff could submit additional evidence in support of its motion, *id.* at 48:23–24.

EVIDENCE SUBMITTED

Plaintiff submits the following additional evidence.

I. Declarations of Iranian asylum seekers whose confidential information was shared with the Iranian government.

IALDF previously submitted three forms of evidence documenting the sharing of confidential asylum information with the Iranian government: (1) declarations from Iranian asylum seekers; (2) a declaration from Cyrus Mehri detailing his conversations with a Senior Iranian Official; and (3) two New York Times articles quoting Iranian officials who possessed this information. *See supra* at 1–2.

IALDF now submits supplemental declarations from six of these asylum seekers. These supplemental declarations provide additional clarity about what information was shared with Iranian officials and how these individuals know that the information had been shared. These declarations include:

- **Supplemental Declaration of S.O.** (Ex. 1). S.O.'s previous declaration, ECF No. 9-4 at 15–20 (Ex. 2.B), described that an Iranian official "had specific, detailed knowledge about our immigration cases." *Id.* at 19. S.O.'s supplemental declaration clarifies that the Iranian official specifically knew details of detainees' asylum cases. When an Iranian official met with a group of Iranian detainees, he had a list of names and told detainees: "I know you have applied for asylum." Ex. 1, ¶ 5. He also told the detainees that only one individual had not gone through the immigration court and named that person. *Id.* Further, the declaration describes an ICE official allowing the Iranian official to read information from the ICE system on his phone. *Id.*
- **Supplemental Declaration of E.R.** (Ex. 2). E.R.'s previous declaration, ECF No. 9-5 at 1–8 (Ex. 2.F), described being forced to speak with an Iranian official who "knew about [E.R.'s] asylum claim and where [E.R.] was in [the] asylum process." *Id.* at 5. E.R.'s supplemental declaration adds that the Iranian official stated: "I know that your fear interview has been rejected, and ICE has asked us to issue a travel document for you." Ex 2, ¶ 4.
- **Supplemental Declaration of A.M.** (Ex. 3). A.M.'s previous declaration, ECF No. 9-5 at 9–14 (Ex. 2.G), described that ICE forced thirteen or fourteen Iranian detainees to meet with an Iranian official, who "knew where we are in our asylum process." *Id.* at 12. A.M.'s supplemental declaration elaborates that the Iranian official told the detainees that "based

on the list given to us, I know who has their asylum claim denied and whose asylum claim is still pending." Ex. 3, ¶ 5.

- **Supplemental Declaration of N.Y.** (Ex. 4). N.Y.'s previous declaration, ECF No. 9-5 at 15–20 (Ex. 2.H), described a meeting where an Iranian official told detainees that "he knows about our cases." *Id.* at 18. N.Y.'s supplemental declaration adds detail about this meeting. The Iranian official told detainees "that based on the list given to us, I know that your asylum cases are denied," and then "he even read a few names as examples." Ex. 4, ¶ 5.
- **Supplemental Declaration of N.A.** (Ex. 5). N.A.'s previous declaration, ECF No. 9-5 at 21–26 (Ex. 2.J), described a meeting between Iranian detainees and an Iranian official, during which an ICE officer shared with the Iranian official information about the husband of one of the detainees and his status as an asylum seeker. *Id.* at 24. N.A.'s supplemental declaration explains that the Iranian official had a list of names and the husband was not on the list; nevertheless, the ICE officer "checked on his computer and replied to [the Iranian official] with details of [the asylum seeker husband's] case on the spot." Ex. 5, ¶ 4; *see id.* ¶ 5.
- **Supplemental Declaration of C.Y.** (Ex. 6). C.Y.'s previous declaration, ECF No. 9-5 at 34–38 (Ex. 2.L), described a forced phone call with an Iranian official who "knew my name, my A number, and all the details of my asylum case, including the basis of my asylum claim, where I was in my asylum process, and even … the entire transcript of my fear interview." *Id.* ¶ 6. C.Y.'s supplemental declaration reiterates this information and adds that the Iranian official said that she had "seen your final decision from your asylum case hearing." Ex. 6, ¶ 5. It explains that an Iranian official said "she had my whole case

file in her hands, and that this was all sent to them by ICE." *Id.* And she had information that was available only in the file. *Id.*

II. Declaration revealing the identity of the Senior Official and efforts to seek his appearance and testimony.

IALDF previously submitted the Declaration of Cyrus Mehri, ECF No. 9-6, which described, among other things, his direct communications with a Senior Official of Iran's Interest Section in Washington, D.C., whom that declaration referred to only as the "Senior Official." *See id.* ¶¶ 17–66. At the August 5 preliminary injunction hearing, the Court questioned whether it can rely on an anonymous Iranian official speaking through a third party, Hrg. Tr. at 48:21–22, and encouraged IALDF to seek the official's appearance and testimony, *id.* at 46:24–25. IALDF now submits a second declaration from Mr. Mehri that addresses both topics. Ex. 7.

First, the declaration identifies the Senior Official by name and explains his role within the Iranian Interests Section. *See id.* ¶¶ 3–5. Second, the declaration reports two phone calls between Mr. Mehri and the Senior Official, including the Senior Official's refusal to testify at the evidentiary hearing based on his diplomatic status. *See id.* ¶¶ 6–18.

As IALDF explained in support of its motion for a stay and a preliminary injunction, the Court may consider hearsay evidence in connection with Plaintiff's motion for preliminary relief. *See* Pl. Reply, ECF No. 24, at 4–5 (citing *Talbott v. United States*, 775 F. Supp. 3d 283, 300 (D.D.C. 2025); *SPLC v. DHS*, No. 18-cv-760, 2020 WL 3265533, at *3 n.2 (D.D.C. June 17, 2020); *Karem v. Trump*, 404 F. Supp. 3d 203, 207–09 (D.D.C. 2019)). Further, Mr. Mehri's account of the statements made by the Senior Official may be considered under the residual exception to the hearsay rule. *See* Fed. R. Evid. 807. The Senior Official has diplomatic immunity and is not subject to judicial process. *See*, *e.g.*, *In re Grand Jury Procs., Doe No. 700*, 817 F.2d 1108, 1111 (4th Cir. 1987) (holding that under the Vienna Convention on Diplomatic Relations,

foreign officials with diplomatic status are immune from civil process and are not obliged to give evidence as a witness). Thus, Mr. Mehri's account of the Senior Official's statements is more probative than any other evidence IALDF can obtain through reasonable efforts. Mr. Mehri will be available to testify at the evidentiary hearing on October 15, 2026.

III. Declaration detailing the quantity of impairment to IALDF's ability to serve its clients.

In an earlier declaration, IALDF's Interim Executive Director, Ali Rahnama, explained how Defendants' information-sharing policy concretely impacts IALDF and required the organization to make substantial operational changes. *See* Rahnama Decl., ECF No. 9-3, ¶¶ 18–28. In light of Defendants' information-sharing policy, IALDF has been forced to spend substantial time on additional tasks, including advising clients who fear their information has been shared, speaking with detainees and relatives whose information has been shared, and conducting disclosure-risk screening and safety planning. *Id.* ¶ 23. Each client interview now takes approximately 20% longer, and this additional work takes approximately five to ten hours per week. *Id.* ¶ 24.

At the August 5 preliminary injunction hearing, the Court asked IALDF to provide a baseline to contextualize this additional work. Hrg. Tr. at 21:15–18. IALDF now submits a supplemental declaration from Mr. Rahnama providing that information.

Mr. Rahnama's supplemental declaration explains that IALDF is composed of a small team with a small budget. *See* Ex. 8. Through September 2026, it had only two full-time attorneys, two non-attorney staff members, and one attorney who volunteers on a limited pro bono basis. *Id.* ¶¶ 2, 4. Additionally, IALDF consults a team of external advisors, four attorneys serving on its Case Review and Strategy Committee who help guide IALDF's strategy but do not perform any of IALDF's day-to-day legal work. *Id.* ¶ 3. Mr. Rahnama's supplemental declaration underscores

that the burden imposed by the challenged policy is a measurable and significant burden on IALDF's small team. *See id.* ¶¶ 5–7.

Indeed, Mr. Rahnama's declarations illustrate that IALDF suffers a materially identical injury to those that have previously given rise to organizational standing: IALDF "will 'be unable to represent the same number of clients that it does currently,' will need to 'spend more resources on each individual case,' and will be 'force[d] ... to divert scarce resources away from other important programs.'" *O.A. v. Trump*, 404 F. Supp. 3d 109, 143 (D.D.C. 2019). Mr. Rahnama will be available to testify at the evidentiary hearing on October 15, 2026.

IV. Documents indicating that the Iranian government has a role in selecting those to be removed.

In his first declaration, Mr. Mehri indicated that individuals from the Iranian Interests Section and ICE met monthly to review detainee files, and that the Senior Official selected specific individuals for deportation. First Mehri Decl., ECF No. 9-6, ¶¶ 23, 30–31. IALDF has also cited public reporting indicating that Iranian officials worked together with U.S. officials to choose which Iranians were deported. *See* Notice of Factual Developments, ECF No. 36, ¶ 8 n.1.

IALDF now submits additional documents obtained under the Freedom of Information Act that confirm that the Iranian Interests Section was involved in selecting which Iranian individuals would be removed. Ex. 9. These documents include emails among officials at ICE and DHS discussing deportation flights to Iran. For example, three days before the September 29, 2025, deportation flight, one ICE official wrote that "[t]he Iran Embassy … requested that [three individuals] be added to the flight." *Id.* at 8. Similarly, in August 2025, one ICE official states: "Per the request from the Iran Embassy I added a few cases" to a deportation flight. *Id.* at 7.

More broadly, these documents also evidence regular meetings and communications between the Iranian Interests Section and the United States Government concerning removals. *See id.* at 1, 4–6.

V. Declarations regarding planned mass deportation flights to Iran in July 2026 and continued communication between Iranian officials and detainees.

At the August 5 hearing, the Court asked whether there were ongoing removals of Iranian asylum seekers. Hrg. Tr., ECF No. 29 at 7:21–24. Plaintiff informed the Court that there was a flight scheduled to remove Iranians to Iran in March 2026, but it was canceled due to the war, and that at least one Iranian asylum seeker was removed to the Central African Republic in June 2026. *Id.* at 49:25–50:9. Plaintiff subsequently informed the Court that (1) the United States had removed Iranian asylum seekers to the Central African Republic; and (2) a subsequent deportation flight to Iran had been scheduled for July 2026, and that it was canceled only after hostilities resumed. Notice of Factual Developments, ECF No. 36, ¶¶ 4–6 10.

IALDF now submits additional information about the flight that was planned for July 2026, including from asylum seekers who were scheduled to be on that flight or who had relatives who were scheduled to be on that flight. *See* Decl. of D.K. (Ex. 10) at 1–2; Decl. of F.B. (Ex. 11), ¶¶ 9–10; Decl. of G.W. (Ex. 12), ¶¶ 4–5; Decl. of J.H. (Ex. 13), ¶¶ 13–15.

Further, these declarations underscore that ICE continued to force communications between the Iranian Interests Section and Iranian detainees after February 2026, showing continuing collaboration.

Dated: October 8, 2026

Respectfully submitted,

/s/ Michael T. Kirkpatrick

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SUPPLEMENTAL DECLARATION OF [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Commissions, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted] (A# [redacted]), hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge, except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information and I believe it to be true.

My Earlier Declaration

1. On December 2, 2025, at Eloy Detention Center, I signed a declaration describing my background, my fear of return to Iran, and the disclosure of information to the government of the Islamic Republic of Iran (the "regime"). I understand that my declaration was submitted to the United States District Court for the District of Columbia in Iranian American Legal Defense Fund v. Rubio, No. 26-cv-2375, as Exhibit 2.B. I have reviewed my earlier declaration again. It remains true and correct. I make this supplemental declaration to provide additional detail about the visit that a representative of the regime's Interests Section made to my detention center, what information about our cases he had, and the confidential information in my immigration case.

2. The conversations I describe in this declaration took place in Farsi (Persian), my native language, except where I say otherwise. Quotations are my best recollection of what was said, translated into English.

My Asylum Case and the Confidential Information in It

3. As I described in my earlier declaration, my claims are based on my political protest activity since age 18 — including during the Mahsa Amini protests, my three-day detention in September 2023 over my protests and my studio's Instagram page, my solitary confinement in the "Pelak-e-100" facility in Shiraz, and the regime's pursuit of me afterward. In my immigration case I disclosed detailed information about my identity, my family, my activities, and the reasons I fear the regime. On August 15, 2025, the immigration judge denied my asylum claim pursuant to the CLP rule while finding my evidence and testimony

credible and persuasive, and approved withholding of removal; my motion to reconsider and my bond request were denied. Information about the fact that I sought asylum, what I said in support of it, my interviews, and the status of my case is exactly the information I understood the United States would keep from the regime. Disclosure of this information has put not only me but my family and acquaintances in serious danger.

The Iranian Official's Visit to the Detention Center

4. On or about **November 2025,** without explanation, facility administrators instructed several Iranian detainees, including me, to gather in the visitation area. The official introduced himself as [redacted], the Director of the Interests Section of the Islamic Republic of Iran in Washington, D.C. Besides me, present at the meeting were detainees [redacted], another older Iranian detainee on wheelchair, and a tall white ICE officer which at the meeting had received a gift of full box of "gaz" (an Iranian sweet) from Mr. [redacted].

5. The official, [redacted], had a list of names in his hand, that he looked through it and told us, that I know you have applied for asylum and that I understand that many come here because of the hardships in Iran, but you can go back and nothing would happen to you unless you have a case in Iran. Reading through the list, it seems, he said, among you only one has not yet gone to the immigration court, he actually name the person. At one point, [redacted], one of the detainees, explained that she was worried about her husband and that they have been separated for months. Mr. [redacted] asked the white ICE officer present to check for the husband's name in ICE system, and the ICE officer started looking for his info on his phone right there. The ICE Officer was sharing his screen with and showing to Mr. [redacted] his phone screen as he was searching for information and letting him read through it. Then, Mr. [redacted] turned around to [redacted] and told her that unfortunately her husband is on the list of the flight set for December 7, 2025.

6. When one of the detainees told him to leave us alone, he replied that "nothing will happen to you." When he was asked about hijab enforcement, he commented sarcastically, implying that political protest can cause persecution even in the United States. He told us that I know people who have been in detention for years implying that we will be stuck in detention forever to scare us. To also persuade us to go back, he told us the regime is different now and encouraged us to return to Iran, minimizing the dangers facing us if returned. When detainees corrected him — distinguishing between Iran and the Islamic Republic — he ignored the

distinction. This is less than two months before the Iranian regime massacred tens of thousands of Iranians in January 2026.

7. During the meeting he handed me his business card. In front of him, I wrote the words "blood washer" on the card and showed it to him. I kept the card, and it is attached to my earlier declaration. The card bears his name, his title, and shows the Iranian Interest Sections' information.

8. I have never given the Interests Section of the Islamic Republic of Iran, or any other arm or representative of the regime, permission to receive information about me, my immigration case, or my asylum claim. No one from the United States government ever asked for my consent to share information about me or my case with the regime or its representatives, and I never consented.

9. Seeing a regime official inside a U.S. detention facility, looking like a kind of person I had to run away from for my life, holding our names and detailed knowledge of our asylum cases, shared by a government I have taken refuge to, was terrifying. He looked exactly like the regime intelligence operatives I encountered in Iran, and other asylum seeker detainees reacted the same way, in fear and shock. Many of us fled Iran to escape repression, political persecution, or religious harassment. Now that the regime has been given information about me — including that I sought protection in the United States —I face a new cause for the regime to interrogate, torture, imprisonment, and possibly execute me if I am ever returned, and my family in Iran is also exposed to reprisal.

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

Executed on the 28 day of September, 2026,

at City of Austin, State of Texas.

[redacted]

[redacted]

Supplemental Declaration of E.R.

SUPPLEMENTAL DECLARATION OF [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Commissions, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted] hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge, except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information and I believe it to be true.

My Earlier Declaration

1. On June 18, 2026, at San Luis Detention Facility, I signed a declaration describing my background, my fear of return to Iran, and the disclosure of information to the government of the Islamic Republic of Iran (the "regime"). I understand that my declaration was submitted to the United States District Court for the District of Columbia in Iranian American Legal Defense Fund v. Rubio, No. 26-cv-2375, as Exhibit 2.F. I have reviewed my earlier declaration again. It remains true and correct. I make this supplemental declaration to provide additional detail about the telephone call with a representative of the regime's Interests Section that ICE required me to take, exactly what she knew about my asylum case, and the later transfer to Otay Mesa for another meeting with regime representatives.

2. The conversations I describe in this declaration took place in Farsi (Persian), my native language, except where I say otherwise. Quotations are my best recollection of what was said, translated into English.

My Asylum Case and the Confidential Information in It

3. As I described in my earlier declaration, I am a Christian convert from Islam, baptized in 2017 in Türkiye. I evangelized in Iran; at the end of summer 2024 I was stopped by Iranian police, my phone was searched, revealing my pictures in church and my identity as a Christian, and I was beaten as an "infidel" before I escaped; and after I left Iran on January 2, 2025, my home was raided, officers told my father I am a "dirty Christian," and my father — who has threatened my life for my faith — realized I converted. I am an applicant for asylum, withholding of removal, and protection under the Convention Against Torture, and my case

remains pending before the Immigration Court. In connection with my immigration case I disclosed detailed information about my identity, my family, my friends, my political opinion, my religion, and the reasons I fear the regime, in reliance on the confidentiality protections of U.S. and international law and the U.S. government's assurances that this information would not be shared with the Iranian regime. After I arrived in the U.S. and before my fear interview [redacted] in two separate meetings with ICE and FBI about my background, they told me that my information will not be shared with the regime or anyone else, and they will remain safely with US [redacted]

The Telephone Call ICE Required Me to Take from the Interests Section

4. In October 2025, while I was in detention at San Luis Detention Facility, ~~I was taken by ICE to a phone booth and forced to speak with a representative of the Iranian regime from the Iranian Interests Section.~~ ICE officer [redacted] took me to intake and to a room and handed me his iPhone and told me it is translate talk to them, and I talked to a woman on the other side, she introduced herself to be from the Iranian Interest section, and ~~The representative was a woman~~ that "I know that your [redacted] fear interview has been rejected, and ICE has asked us to issue a travel document for you." [redacted]

5. ~~The representative knew about my asylum claim and that I had an asylum process. She told me that my asylum case had been denied and that I should go back to Iran.~~ I told her that [redacted]. You know that I am a Christian convert and that I have a judicial case against me in Iran that ~~her~~ your regime is pursuing against me. She told me that she does not care and that I should go back — and that if I do not voluntarily go back, "the U.S. will send me to Africa." I had never spoken with the Interests Section before this call, and I never gave it any information about myself or my case. [redacted]. She added that "No where else would be safe for you." [redacted]

The Transfer to Otay Mesa for Another Meeting with Regime Representatives

6. About three weeks after this call, ICE rounded up all the Iranians in my detention facility — if I remember right, six men and three women — and transferred us to the Otay Mesa Detention Facility. When we got there, they told us we were meeting with a representative of the Iranian regime. I strongly refused and did not go to the meeting. I was transferred back to the San Luis Detention Facility, where I have been detained.

7. I have never given the Interests Section of the Islamic Republic of Iran, or any other arm of the regime, permission to receive information about me, my immigration case, or my asylum claim. No one from the United States government ever asked for my consent to share information about me or my case with the regime or its representatives, and I never consented.

8. Now that the regime knows my identity, my location in U.S. detention, my asylum claim, and its status, I face a new and independent lethal risk that did not exist in the same way before the disclosure: I have been identified to the very government I ran away from — and to a father who has threatened my life — as a Christian convert who sought protection from the United States. The ~~representative~~ Iranian's threat that I would be sent "to Africa" if I did not return voluntarily to Iran, [redacted] also makes me afraid that I will be removed to a third country where the regime can reach me. This was before any Iranian was sent to Africa. Now that many other Iranian asylum seekers have been sent to Africa, this threat is very real and that the Iranian Interest Section and the regime had and has direct knowledge of ICE plans.

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

Executed on the 02 day of September, 2026,

at Detention Facility of otay mesa City of otay mesa, State of CA.

[redacted]

[redacted] 3

Supplemental Declaration of A.M.

SUPPLEMENTAL [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Commissions, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted] hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge, except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information and I believe it to be true.

My Earlier Declaration

1. On June 19, 2026, at Eloy Detention Center, I signed a declaration describing my background, my fear of return to Iran, and the disclosure of information to the government of the Islamic Republic of Iran (the "regime"). I understand that my declaration was submitted to the United States District Court for the District of Columbia in Iranian American Legal Defense Fund v. Rubio, No. 26-cv-2375, as Exhibit 2.G. I have reviewed my earlier declaration again It remains true and correct. I make this supplemental declaration to provide additional detail about the meeting with the Director of the regime's Interests Section that ICE required me to attend, and exactly what he had and said about our asylum cases.

2. The conversations I describe in this declaration took place in Farsi (Persian), my native language, except where I say otherwise. Quotations are my best recollection of what was said, translated into English.

My Asylum Case and the Confidential Information in It

3. As I described in my earlier declaration, I am a Christian convert from Islam, baptized in 2011, and was part of an underground church. Due to my belief, I was captured and sentenced to 80 lashes in 2023, which was temporarily suspended; I was fired from my job under regime pressure; in fall of 2024 my apartment was raided and my notes, Bibles, and electronics were confiscated; and I ran away from Iran about a week before my court date, on December 19, 2024. My case (asylum, withholding, and protection under the Convention Against Torture) remains pending on appeal before the BIA. In connection with my immigration case, I disclosed detailed information about my identity, my family, my political opinion, my religion

— including my church and the people in it — and the reasons I fear the regime, in reliance on the confidentiality protections of U.S. and international law and the U.S. government's assurances. Indeed, one of the reasons we ended up in the U.S. was the belief that the U.S. Law would prevent our information to get back to the regime.

The Meeting ICE Required Me to Attend with the Director of the Interests Section

4. In or about November 2025, I was called by ICE, along with other Iranian detainees, to go to the North Visiting section, and forced to meet with the Director of the Iranian Interests Section, [redacted]. We were about seven men and six or seven women detainees in the meeting. From Corecivic staff, I recollect Ms. olivas present, and an ICE officer, blue eyes, white, probably around 60 years old. In the meeting, the following detainees were also present: [redacted]

5. [redacted] was trying to convince us to go back to Iran. He had a list of our names, and he knew where we are in our asylum process. He said we should be OK to go back unless there is a judicial proceeding against us. In response to why you are insisting on our return, he, [redacted] told us that "based on the list given to us, I know who has their asylum claim denied and whose asylum case is still pending." He continued, "But I promise you that under this administration none of you would be released or they will send you to Africa."

6. When I saw him, I was disgusted with the U.S. government for forcing us to meet the agents of the regime, and I told my pod manager so. My Pod Manager is J. Domiata. when we were forced to come to North Visit to meet with him, we were provided no information on whether we could refuse meeting him.

7. I have never given the Interests Section of the Islamic Republic of Iran, or any other arm of the regime, permission to receive information about me, my immigration case, or my asylum claim. No one from the United States government ever asked for my consent to share information about me or my case with the regime or its representatives, and I never consented.

8. Now that information about my asylum claim and detention records has been given to the Iranian regime, I face a new and independent lethal risk that did not exist in the same way before: I have been identified, by the U.S. government, to the very government I ran away

from — a government that has already sentenced me to 80 lashes for my faith, with worse waiting [redacted] for me if returned.

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

Executed on the 01 day of September, 2026,

at Detention Facility of Eloy Detention Center City of Eloy, State of Ar.

[redacted]

[redacted]

Supplemental Declaration of N.Y.

SUPPLEMENTAL [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Commissions, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted] hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge, except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information and I believe it to be true.

My Earlier Declaration

1. On June 19, 2026, at Eloy Detention Center, I signed a declaration describing my background, my fear of return to Iran, and the disclosure of information to the government of the Islamic Republic of Iran (the "regime"). I understand that my declaration was submitted to the United States District Court for the District of Columbia in Iranian American Legal Defense Fund v. Rubio, No. 26-cv-2375, as Exhibit 2.H. I have reviewed my earlier declaration again. It remains true and correct. I make this supplemental declaration to provide additional detail about the meeting with the Director of the regime's Interests Section that ICE required me to attend, and what he said about our cases.

2. The conversations I describe in this declaration took place in Farsi (Persian), my native language, except where I say otherwise. Quotations are my best recollection of what was said, translated into English.

My Asylum Case and the Confidential Information in It

3. As I described in my earlier declaration, I am a Christian convert from Islam. I was expelled from my university, where I was pursuing my master's degree in architectural technology, for my religious activities and belief. When my house was raided by the regime police, they found Bibles in my house. My wife and I were very active for women's rights. My case (asylum, withholding, and protection under the Convention Against Torture) remains pending on appeal before the BIA.

[redacted] (1)

In connection with my immigration case, I disclosed detailed information about my identity, my family, my political opinion, my religion, and the reasons I fear the regime, in reliance on the U.S. government's duty to follow its laws and international law and its assurances that this information would not be shared with the Iranian regime.

The Meeting ICE Required Me to Attend with the Director of the Interests Section

4. In or about November 2025, I, along with other Iranian detainees, was forced into a general meeting by ICE to meet the Director of the Iranian Interests Section in Washington, [redacted]. This happened without any advance notice to me. He came to the general meeting area of our detention center to convince us to go back to Iran. I remember the following also present at the meeting: [redacted]

5. He said he knows about our cases, and that the U.S. "will keep you in a dungeon or send you to Africa." ~~He said unless you have an open case in Iran you should be fine.~~ He told us that based on the list given to US, I know that your asylum cases are denied, at which time he even read a few names as examples. he added that he is supposed to go around the U.S. to many more ~~facilities~~ detention facilities.

6. I have never given the Interests Section of the Islamic Republic of Iran, or any other arm of the regime, permission to receive information about me, my immigration case, or my asylum claim. No one from the United States government ever asked for my consent to share information about me or my case with the regime or its representatives, and I never consented. I Also remember officer of ICE present to be a tall white person and CoreCivic staff to be Ms. olivas.

7. Now that information about my asylum claim and detention records has been disclosed by ICE to the Iranian regime, I face a new and independent lethal risk and danger that did not exist in the same way before the disclosure: I have been identified to the very government I ran away from for my life. This disclosure has materially increased the chances that I will be detained, interrogated, tortured, or killed if I am ever returned to Iran, and it has exposed my acquaintances and family who remain in Iran to reprisal. The Director's threat that the U.S. would keep us "in a dungeon" or send us "to Africa" also makes me afraid of being removed to a third country where the regime can reach me.

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

Executed on the 01 day of September 2026,

at Detention Facility of Eloy Detention City of Eloy, State of Ar.

[redacted]

[redacted]

Supplemental Declaration of N.A.

SUPPLEMENTAL DECLARATION OF [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Commissions, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted] hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge, except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information and I believe it to be true.

My Earlier Declaration

1. On June 20, 2026, at Eloy Detention Facility, I signed a declaration describing my background, my fear of return to Iran, and the disclosure of information to the government of the Islamic Republic of Iran (the "regime"). I understand that my declaration was submitted to the United States District Court for the District of Columbia in Iranian American Legal Defense Fund v. Rubio, No. 26-cv-2375, as Exhibit 2.J. I have reviewed my earlier declaration again. It remains true and correct. I make this supplemental declaration to provide additional detail about the meeting with [redacted], the Director of the regime's Interests Section, that ICE required me to attend — including the moment when an ICE officer, at [redacted] request, looked up on his computer and shared information about a detainee's husband's asylum case on the spot.

My Asylum Case and the Confidential Information in It

2. As I described in my earlier declaration, I am a Christian convert from Islam, baptized in Iran before starting my bachelor's degree in psychology. After I resisted and reported an attempted rape by a university dean, I was detained, pressured to drop my case, and tortured; my house was raided during the legal battle and a Bible was found in my room, which was added to the charges against me; and since leaving Iran I have been tried in absentia for apostasy and sentenced to prison. In connection with my asylum case, I disclosed detailed information about my identity, my family, my political opinion, my religion, and the reasons I fear the regime, in reliance on the confidentiality protections of U.S. and international laws and norms and my reliance on the U.S. Government's assurances that this information would not be shared with the Iranian regime.

The Meeting ICE Required Me to Attend with [redacted]

3. In or about November 2025, I was called by ICE to go to North Visit. I was forced, along with other Iranian detainees, to meet with the Director of the Iranian Interests Section, [redacted] He was there to convince us to go back to Iran. I remember the following other detainees present: [redacted] the ICE officer present was a tall white man.

4. [redacted] had a list of all of our names. He even called on two of the detainees who had not shown up. He was holding a list of our names, and when asked by [redacted] about her husband's status, who was an asylum seeker kept in Georgia, [redacted] asked her name and checked the list and then asked her husband's name and saw that his name is not on the list. [redacted] asked the ICE officer to check the husband's status, who is an asylum seeker, and the officer checked on his computer and replied to him with details of his case on the spot.

5. There was an ICE officer with [redacted] During the meeting, one of the female Iranian asylum seeker detainees asked about her husband, who was detained in a different facility. [redacted] asked the ICE officer to get information about him and where he is in his case as an asylum seeker. The ICE officer shared that information with [redacted] on the spot looking through his computer.

6. I have never given the Interests Section of the Islamic Republic of Iran, or any other arm of the regime, permission to receive information about me, my immigration case, or my asylum claim. No one from the United States government ever asked for my consent to share information about me or my case with the regime or its representatives, and I never consented.

7. Watching a United States officer hand a regime official information about an Iranian asylum seeker, in front of us, made me understand that the regime can learn anything about us — including that we sought protection from it and what we said to get it. Now that information about my asylum claim and detention records has been disclosed by ICE to the murderous regime in Iran, I face a new and independent risk of torture or persecution: I have been identified to the very government whose courts have already convicted me of apostasy. This disclosure has materially increased the likelihood that I will be detained, interrogated, tortured,

or killed if I am ever returned to Iran, and it has exposed my acquaintances and family who remain in Iran to reprisal.

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

Executed on the first day of September, 2026,

at Detention Facility of Eloy detention center City of Eloy, State of AZ

[redacted]

[redacted]

Supplemental Declaration of C.Y.

SUPPLEMENTAL DECLARATION OF [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Commissions, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted], hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge, except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information and I believe it to be true.

My Earlier Declaration

1. On July 14, 2026, at El Valle Detention Facility, I signed a declaration describing my background, my fear of return to Iran, and the disclosure of information to the government of the Islamic Republic of Iran (the "regime"). I understand that my declaration was submitted to the United States District Court for the District of Columbia in Iranian American Legal Defense Fund v. Rubio, No. 26-cv-2375, as Exhibit 2.L. I have reviewed my earlier declaration again. It remains true and correct. I make this supplemental declaration to provide additional detail about the telephone call from the regime's Interests Section that ICE required me to take, and exactly which details of my asylum case the representative recited to me.

2. The conversations I describe in this declaration took place in Farsi (Persian), my native language, except where I say otherwise. Quotations are my best recollection of what was said, translated into English.

My Asylum Case and the Confidential Information in It

3. As I described in my earlier declaration, I participated in political protests in Tehran against the Islamic regime in 2018; I was detained on the street on June 2, 2018, held for seven days, and released on bail on June 9, 2018; on July 17, 2018, I was summoned to face charges of acting against national security, assembly and collusion, and propaganda against the state; and I escaped Iran on August 1, 2018. I also participated in the Woman, Life, Freedom protests in Vienna, Austria in 2022. Since I fled, agents of the Islamic Republic have continued to

regularly visit my family to ask about my whereabouts. My case (asylum, withholding of removal, and protection under the Convention Against Torture) remains pending on appeal before the BIA. In connection with my immigration case, I disclosed detailed information about my identity, my family, my political opinion, my religion, and the reasons I fear the regime — including in my fear interview — in reliance on the confidentiality protections of U.S. and international laws and norms, and the U.S. Government's assurances that this information would not be shared with the Iranian Regime.

The Telephone Call ICE Required Me to Take from the Interests Section

4. In or around December 2025, my pod officer told me that I had an incoming call. I was brought to the phones in the visitation area. I asked the officer stationed by the phones who was on the other line, and the officer told me that it was the Iranian consulate. I told this officer that I did not want to speak on the phone, as I had no interest in speaking to the Iranian consulate or any Islamic Regime representative. In response, the officer told me I had no choice, and that I would not be allowed to return to my pod until I answered the call. Realizing I had no choice, I was forced to speak on the phone to the Iranian consulate.

5. A female representative of the Iranian Regime from the Iranian Interests Section was on the line. She knew my name, my A-number, and all the details of my asylum case, including the basis of my asylum claim and where I was in my asylum process. She told me that she had the entire transcript of my fear interview. She told me that, as we spoke, she had my whole case file in her hands, and that this was all sent to them by ICE. I told the representative that I did not want to talk to them, and I hung up. The name of the female representative from the Iranian Interests Section was [redacted] During the phone call, [redacted] knew of and called me by both of my names: the incorrect one on my U.S. records, and my correct name. I had been using the incorrect name in Europe when I lived there. [redacted] also told me she knows all the countries I lived in previously, and all the countries I traveled through to reach the U.S. Also, I never gave the Iranian regime my incorrect name, but that was the name on my asylum U.S. paperwork.

[redacted] heard she knows that the basis of my asylum claim is political activity against the regime. She said "I know you're against the regime. I have seen your final decision from your asylum case hearing. I know your asylum case is real." The call took about 5-6 minutes in total. The same day, I told my lawyer and friends about the call.

6. I have never given the Interests Section of the Islamic Republic of Iran, or any other arm of the regime, permission to receive information about me, my immigration case, or my asylum claim. No one from the United States government ever asked for my consent to share information about me or my case with the regime or its representatives, and I never consented.

7. Now that information about my asylum claim and detention records has been disclosed by ICE to the Iranian Regime, I face a new and independent lethal risk and danger that did not exist in the same way before the disclosure: I have been identified to the very government I ran away from for my life — a government that already summoned me on national-security charges and whose agents still visit my family to ask where I am. The disclosure has materially increased the likelihood that I will be detained, interrogated, tortured, or killed if I am ever returned to Iran, and it has exposed my family, friends, and acquaintances who remain in Iran to reprisal.

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

Executed on the 23 day of September, 2026.

at Detention Facility of El Valle City of Raymondville, State of Texas

[redacted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IRANIAN AMERICAN LEGAL DEFENSE FUND,

Plaintiff,

v.

MARCO RUBIO, in his official capacity as Secretary of State, *et al.*,

Defendants.

Civil Action No. 26-2375-ACR

FILED UNDER SEAL
REDACTED VERSION FILED ON PUBLIC DOCKET

SECOND DECLARATION OF CYRUS MEHRI
(FILED UNDER SEAL)

I, Cyrus Mehri, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct. If called as a witness, I could and would testify as follows.

Background and Purpose

1. I am an attorney and a member in good standing of the bars of Washington, D.C., and Connecticut, a founding partner of Mehri & Skalet, PLLC, and a member of the Board of Directors of the Iranian American Legal Defense Fund ("IALDF"), the Plaintiff in this action. I previously submitted a declaration in this action, *see* Declaration of Cyrus Mehri, ECF No. 9-6, filed July 15, 2026 (the "First Mehri Decl."), which described, among other things, my direct communications with the Senior Official of the Islamic Republic of Iran's Interests Section in Washington, D.C., whom that declaration referred to only as the "Senior Official." I incorporate that declaration by reference. I have direct, personal knowledge of the facts set forth below.

2. I submit this second declaration under seal, concurrently with Plaintiff's Motion for Leave to File Under Seal. I am also submitting a redacted publicly filed version of the declaration. In this declaration, I identify by name, title, and role the "Senior Official" referenced throughout my prior declaration — the Senior Official of the Islamic Republic of Iran whose visits to, and contacts with, detained Iranian asylum seekers in U.S. Immigration and Customs Enforcement ("ICE") custody are described in my prior declaration, in the

Declaration of Ali Rahnama ("Rahnama Decl. A"), in the Second Declaration of Ali Rahnama ("Rahnama Decl. B"), and in Exhibits 2.A through 2.L thereto. I also report on more recent communications with the Senior Official and provide additional context.

Identity of the Senior Official

3. The "Senior Official" referenced in my prior declaration is [redacted]. Mr. [redacted] of the Interests Section of the Islamic Republic of Iran in Washington, D.C. (the "Iranian Interests Section"), and in that capacity is [redacted]

4. Because the United States and the Islamic Republic of Iran have not maintained diplomatic relations since 1980, the Iranian Interests Section operates under the auspices of the Embassy of Pakistan in Washington, D.C. It is my understanding that [redacted]. Because the Interests Section is the Islamic Republic's only official presence in the United States, [redacted][1]

5. [redacted] to the Iranian American community. As a [redacted] the diaspora's positive contributions to American society. He has an [redacted]

[1] *See* [redacted]

[redacted] in the Iranian American community.

July 13 Telephone Call with Mr. [redacted]

6. On July 13, 2026, I received an unexpected and unsolicited telephone call from Mr. [redacted]. The call occurred less than a week after IALDF filed this case on July 7, 2026, after press outlets had reported on the filing, and after the Interim Executive Director of IALDF, Ali Rahnama ("Mr. Rahnama"), had appeared on MS NOW to discuss the case.

7. I told Mr. [redacted] that I was about to join a weekly call with my law firm colleagues and I would call him afterwards.

8. I called him back around 10:45 a.m. and we spoke for about 20 minutes. I asked him if one of my law partners could join the call. He said "no, I want to talk to you alone." I agreed. He said: "Cyrus, I am seeing all of these press reports which mention my monthly meetings with ICE." He suggested that I could only have gotten such information from him, and said that he thought our earlier conversation "would be confidential" and was "only for clarification purposes." I reminded him that I had specifically told him when we met in person in March that our conversations were not confidential, which he acknowledged.

9. He then told me that he was upset about Mr. Rahnama's interview on MS NOW where Mr. Rahnama highlighted the Islamic Regime's woeful human rights record. I defended Mr. Rahnama and said that "everything Ali said was true." Then, referencing our previous meeting at my office, Mr. [redacted] stated that if he knew "that Ali was going to be there, [he] wouldn't have come."

10. I explained that "our lawsuit is against the Trump Administration for violating U.S. laws." I indicated that he could be called as a witness in the U.S. court system and asked "if so, what would you do?" Relying on his diplomatic status, he said, "I would stay out of it." He made it clear to me that he would not voluntarily participate in a U.S. legal process, and he would stand on his diplomatic status.

September 25 Telephone Call with Mr. [redacted]

11. At the August 5 hearing in this case, the Court suggested that it would like to hear directly from the Senior Official, if possible, and indicated that he could testify under seal to protect his identity. *See* Hr'g Tr., ECF No. 29, at 46:24–47:22. The Court has scheduled the evidentiary hearing for October 15, 2026.

12. On September 25, 2026, at approximately 1:20 p.m., I called Mr. [redacted] to try to arrange for his appearance at the evidentiary hearing. He immediately picked up. I asked him if it was a good time to talk. He explained he was [redacted], but I happened to reach him during a down time.

13. He asked if I was alone. I said, "yes, I am alone at my office." He sounded hurt and upset. He indicated he felt betrayed that what he told me ended up in the Court proceedings. He then explained how upset he was with Mr. Rahnama, alluding to Mr. Rahnama's comments in his interview on MS NOW described above. He stated he was concerned that Mr. Rahnama may have recorded our meeting at my office in March.

14. I told him I was calling to "recap and update" him. I reminded him that when he called me on July 13, I had told him to anticipate that he could be asked to testify in this case. I told him that we filed court papers recounting my prior conversation with him, but "because you were being so forthright with me, I felt strongly that out of fairness, that I did not identify you by name and that instead the papers refer to you as 'a Senior Official'."

15. I further explained that we had a hearing on August 5 and we have an upcoming one on October 15. I told him that the Court "would like to hear from you directly. And the judge will agree to a process that will protect your identity by keeping your name under seal." I added that "I am not giving you legal advice or suggesting what you should do but that I am duty bound to convey the Court's wishes." I indicated that I hoped he would "consider testifying." He responded in clear and emphatic terms and in a respectful tone: "Due to my position, that is something that I cannot do." I read back the quote twice and asked him if he wanted me to share that exact quote with the Court, and he said yes. I asked him to tell me if he changed his mind about testifying.

16. Then he said he wanted me to know "when I go into ICE facilities, I go there to help people who want to meet with me." I responded: "You can say that all you want, but that's not what we are hearing from detainees." I explained that "Iranian detainees are saying that they are forced to meet you against their will, that people are put on mass deportation flights against their will, and their confidential information that should not be shared with you is being shared with you." I added that "we are following the evidence." He was quiet and had no response.

17. He then continued along the lines that he is here to help the Iranian American community. I told him that I understood that he [redacted]. But, I added, "we are never going to agree on this issue," referring to the fate of the Iranian asylum seekers.

18. He seemed to appreciate that I acknowledged that he has been [redacted]. I concluded by reading the quote for a third time that he wanted to be shared with the Court: "Due to my position, that is something that I cannot do." He again confirmed that I could share that exact quote with the Court. I ended the call by again asking him to consider the Court's request and let me know if he changes his mind.

19. I have not heard from him since. If he contacts me or indicates his willingness to testify, I will promptly inform counsel so that the Court can be advised.

Conclusion

20. I respectfully submit this declaration under seal.

21. I am available to testify at the October 15, 2026, evidentiary hearing, and to be cross-examined, regarding the matters set forth in this declaration and in the First Mehri Decl.

22. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 7, 2026, in Washington, D.C.

Cyrus Mehri

Mehri & Skalet, PLLC

Member, Board of Directors, Iranian American Legal Defense Fund

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IRANIAN AMERICAN LEGAL DEFENSE FUND, *Plaintiff*, v. MARCO RUBIO, in his official capacity as Secretary of State, et al., *Defendants*.	Civil Action No. 26-2375-ACR

SUPPLEMENTAL DECLARATION OF ALI RAHNAMA

I, Ali Rahnama, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct. I have personal knowledge of the facts set forth below, based on my role at IALDF and my review of IALDF's personnel, payroll, and time records. If called as a witness, I could and would testify as follows.

1. This declaration is to supplement the first Declaration of Ali Rahnama, ECF No. 9-3, filed on July 15, 2026. During the hearing on August 5, 2026, the Court inquired as to the baseline number of staff and attorney hours at IALDF. *See* Hr'g Tr., ECF No. 29, at 16:19–22, 21:5–18. This supplemental declaration provides that information.

2. Until September 28, 2026, IALDF's internal legal team consisted of two full-time attorneys and one volunteer attorney:

   a. I, Ali Rahnama, as IALDF's Interim Executive Director and a member of its Board of Directors. During this period, at least 50% of my weekly time was spent on administrative rather than legal work;

   b. Bardia Arasteh, a full-time legal fellow employed by IALDF since March 13, 2026; and

   c. Cyrus Mehri, a member of IALDF's Board of Directors who volunteers with the organization. Mr. Mehri works full-time at his law firm, Mehri & Skalet, PLLC;

his legal work for IALDF is limited and pro bono, and his hours are not included in the attorney-hour figures below.

3. Since September 28, 2026, IALDF's internal legal team has consisted of three full-time attorneys and one volunteer attorney:

   a. Yasmine Chubin, who joined IALDF on September 28, 2026, as its first permanent Executive Director;

   b. I, Ali Rahnama; since stepping down as Interim Executive Director on September 28, 2026, I have continued to work for IALDF full-time as a legal and management consultant for a short transitional period, and I remain a member of IALDF's Board of Directors;

   c. Bardia Arasteh, a legal fellow; and

   d. Cyrus Mehri, in the volunteer capacity described in paragraph 2(c).

4. Four external attorneys also serve on IALDF's Case Review and Strategy Committee (CRC). The CRC typically meets once per month, for about an hour, and advises on IALDF's impact litigation and legal strategy. Between such meetings, IALDF staff periodically consult with CRC members for advice. Although the CRC provides strategy advice, it is not involved in IALDF's day-to-day legal work, including with respect to this case.

5. IALDF also has two full-time non-attorney employees. At the time of execution of the first Declaration of Ali Rahnama, IALDF had three summer interns, one high school and two university students, who have since concluded their summer internships. As of the date of this declaration, IALDF has hired one new part-time communications intern.

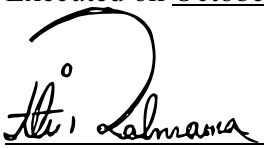
6. Prior to September 28, 2026, IALDF's two attorneys worked a combined total of approximately 80 hours per week on all IALDF legal and non-legal matters and tasks. Additionally, the two non-attorney full-time employees occasionally supported the attorneys with paralegal and research work. During the same period, IALDF's non-attorney staff worked cumulatively about 100 hours per week on all IALDF matters and tasks.

7. Across IALDF's small legal-services team, I estimate that disclosure-risk screening, safety planning, legal research about the information-sharing policy to advise clients, and related emergency communications have resulted in an increased demand on staff and attorney hours of about 15 hours per week — approximately 10 attorney hours and 5 non-attorney staff hours. As a result of the additional screening and counseling the challenged policy requires, each client intake and detention interview now takes approximately 20% longer than it did before. Also, in many cases, this issue adds additional days of visiting detainees as establishing the necessary trust has become a serious hurdle.

8. IALDF is a new and small non-profit organization with an annual budget of under $400,000.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 8, 2026, in Washington, D.C.



Ali Rahnama
Iranian American Legal Defense Fund

U.S. Embassy Branch Office Tel Aviv
+972 3 796 (Office) / +1 (b)(6),(b)(7)(C),(b)(7)(F) (Cell)
(b)(6),(b)(7)(C),(b)(7)(F) *@ice.dhs.gov*

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Wednesday, September 3, 2025 9:07 AM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: Follow-Up on Iran Charter Flight and Next Steps

(b)(6),(b)(7)(C),(b)(7)(F)

Thank you for the manifest. The latest numbers on the WRD show 390 DFO cases. U (b)(5) (b)(5) t? It sounds like you've developed a good working relationship with the Iranian desk in DC, (b)(5) (b)(5)

(b)(5) Like I mentioned in my last, we need to provide a complete ask on the first cut of the manifest. (b)(5) (b)(5) I'll hold for now to see what else we can add. I have until Thursday to get the manifest to our partners in Doha.

Aside from the Iranian manifest. (b)(5) (b)(5)

Best,

(b)(6),(b)(7)(C),(b)(7)(F)
ERO Attaché
Immigration and Customs Enforcement
Department of Homeland Security
U.S. Embassy Branch Office Tel Aviv
+972 3 796 (Office) / +1 (b)(6),(b)(7)(C),(b)(7)(F) (Cell)
(b)(6),(b)(7)(C),(b)(7)(F) *@ice.dhs.gov*

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Wednesday, September 3, 2025 1:35 AM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: Follow-Up on Iran Charter Flight and Next Steps

Good afternoon,

Attached is what I have for the proposed Iran flight.

The 212f cases should be cleared by then, highlighted.

I marked in red the ones that don't have a copy of their passport in (b)(7)(E)

Not all have a PP on person, the ones that don't I will be pushing for TD issuance as the Director states it should be easy to get verified for issuance.

He also would like to go onsite to a location or two to conduct interviews on a few of my choice. I can coordinate a location or two and make sure he talks to the correct individuals.

There are two GITMO cases, one ready to go the is 212f.

(b)(6),(b)(7)(C),(b)(7)(F)
DDO - Middle East/East Africa
Removal Management Division
Enforcement and Removal Operations
(b)(6),(b)(7)(C),(b)(7)(F) (mobile)

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Monday, September 1, 2025 2:44 AM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: Follow-Up on Iran Charter Flight and Next Steps

Good morning,

Circling back on the concept of (b)(5)
A (b)(5)

Last week I met with Qatari MOI and this morning I had a call with Qatar Airways (QR), both meetings were regarding the QR chartered Iranian removal mission we had planned for last week that fell apart. MOI now assures us that they have Iranian approval for the concept and QR is again ready to assist by approving a chartered aircraft for a plane-to-plane transfer in Doha.

Before we push ahead with the new attempt (b)(5)
(b)(5)
(b)(5)
(b)(5)

I need to have a final manifest NLT COB Washington, on Thursday, September 3. Upon receipt, I will share with Qatari MOI, who will work with the Iranian Embassy in Doha for their approval, and QR. Once the manifest goes out, there can be no additions as it will be used by the Iranian Embassy in Doha, Qatari MOI, and Qatar Airways for the final coordination and approval for the flight. Again, we cannot add any additional aliens after we disseminate the manifest, but we can pull aliens off without any concerns.

Please let me know how RMD/RIO wants to proceed.

Best,

(b)(6),(b)(7)(C),(b)(7)(F)
ERO Attaché
Immigration and Customs Enforcement
Department of Homeland Security
U.S. Embassy Branch Office Tel Aviv
+972 3 796 [redacted] (Office) / (b)(6),(b)(7)(C),(b)(7)(F) (Cell)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Sunday, August 31, 2025 3:58 PM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: @ice.dhs.gov>
Subject: RE: Follow-Up on Iran Charter Flight and Next Steps

(b)(5)

I can add all passport holders and ones pending travel documents.

They tend to only issue to the ones wanting to go back so that is not very many. If you can assist on that from there it would be very appreciated.

(b)(6),(b)(7)(C),(b)(7)(F)
Middle East/East Africa
Removal Management Division
Immigration and Customs Enforcement
Enforcement and Removal Operations
500 12th Street SW
Washington, DC 20536
318-401 (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Date: Sunday, Aug 31, 2025 at 2:10 AM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: Follow-Up on Iran Charter Flight and Next Steps

(b)(6),(b)(7)(C),(b)(7)(F)

Thanks for the readout on your meeting. It looks like there is some finger pointing going on, because the Qataris, MOI and MFA, are saying the Iranians did not approve in time. That said, also at play is slow inter-ministerial coordination between the Qatari ministries. They want to assist, but in their desire to do so, likely oversold how quickly they could get it done.

I had a meeting with MOI last week and they are on board agai (b)(5)
(b)(5)

(b)(5)

Let me know your thoughts.

Best,
(b)(6),(b)(7)(C),(b)(7)(F)
ERO Attaché

Immigration and Customs Enforcement
Department of Homeland Security
U.S. Embassy Branch Office Tel Aviv
+972 3 796 [redacted] (Office) / +[redacted] (Cell)
(b)(6),(b)(7)(C),(b)(7)(F) *@ice.dhs.gov*

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Friday, August 29, 2025 10:14 PM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: Follow-Up on Iran Charter Flight and Next Steps

I wanted to provide an update regarding my conversation today with the Director at the Iran Embassy.

The Director raised questions about why the charter flight did not proceed as planned. He mentioned that both he and the Ambassador in Doha were aware of the flight, as we had discussed it last week. After I clarified the situation again, he noted that approval was not sought from the appropriate individuals—specifically, the Ambassador. He emphasized that we can schedule another charter flight at any time, provided we request approval through the proper channels.

Iran has requested that I amend the previous manifest and expedite the removal process. (b)(5) (b)(5) I welcome your thoughts or recommendations on this timeline.

Additionally, the Director expressed willingness to travel to Louisiana to meet with relevant parties, issue travel documents, and verify citizenship for individuals slated for removal.

Please let me know if there are any concerns or additional steps we should take to facilitate this process effectively.

Best regards,
(b)(6),(b)(7)(C),(b)(7)(F)
Deputy Division Officer – Middle East/East Africa
Removal Management Division
Enforcement and Removal Operations
(b)(6),(b)(7)(C),(b)(7)(F) (mobile)

Department of Homeland Security
U.S. Embassy Branch Office Tel Aviv
+972 3 796 (b)(6),(b)(7)(C),(b)(7)(F) ***(Cell)***
(b)(6),(b)(7)(C),(b)(7)(F) *@ice.dhs.gov*

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Monday, September 15, 2025 11:46 PM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: Follow-Up on Iran Charter Flight and Next Steps

Thanks for the offer, you are more than welcome to join this week's meeting.

1. **Embassy Meeting:**
   I will be attending the Embassy again on Thursday or Friday for our weekly meeting. During my last meeting with the Iranian delegation, we discussed potential dates for the facility visit. With the President of Iran visiting the United States starting tomorrow and remaining until the 25th, they have suggested scheduling the visit for September 26th and 27th.

   (b)(5)

   (b)(5) To facilitate their review, I have provided a list of approximately 250 individuals, including passport numbers, to allow for verification in advance. This list also separates individuals with valid passports, most of whom Iran has already verified.

2. **Facility Coordination:**
   I have spoken with Acting FOD [redacted] regarding the visit, and there are no issues from his perspective. I will follow up with the Facility AFODs to ensure there are no conflicting events scheduled during the proposed timeframe.

(b)(6),(b)(7)(C),(b)(7)(F)
DDO - Middle East/East Africa
Removal Management Division
Enforcement and Removal Operations
318-401 [redacted] (mobile)

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Monday, September 15, 2025 10:35 AM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; [redacted]
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: Follow-Up on Iran Charter Flight and Next Steps

[redacted], if needed, I can go with you to the embassy and convey to them the need and that I will be in Doha landed for this transfer and ask them to make this as successful as possible - not sure if that is helpful or not but I'm willing to try.

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>

From: (b)(6),(b)(7)(C),(b)(7)(F)
Sent: 5/21/2025 12:31:32 PM
To: (b)(6),(b)(7)(C),(b)(7)(F)
Subject: 05/20/2025 Read Out Iran DOS Meeting
Attachments: FTC IRAN.xlsx

Good morning,

AAR [redacted] and Myself met with DOS Iran Desk POC's.

We presented the recent FTC's (10 cases) and that this number will increase as most are coming from the same office. Additionally, that's enough cases for a small frame and the cases are ready to depart.

(b)(5),(b)(6),(b)(7)(C),(b)(7)(F)

Respectfully,

(b)(6),(b)(7)(C),(b)(7)(F)
DDO, Middle East and East Africa
HQ Removal Management Division
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
500 12th St SW, Mail Stop 5204
Room 8131
Washington, DC 20536
410) 97[redacted](C)

Countries of Responsibility:
Afghanistan, Algeria, Cape Verde,
Georgia, Iran, Lebanon,
Papau New Guinea,
Somalia, Syria, Tajikistan,
Turkmenistan, Uzbekistan

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(b)(6),(b)(7)(C),(b)(7)(F)
Acting Unit Chief, Air Charter Operations
Removal Division, ICE Air Operations
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
Cell: 267-530
6335 S. Downwind Circle, Suite 104, Mesa, AZ 85212

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From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Wednesday, August 20, 2025 2:33 PM
To (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: SHRC (b)(7)(E) | Egypt-Qatar-India | Itinerary Review

Good afternoon,

Per the request from the Iran Embassy I added a few cases. T8 locked.

(b)(6),(b)(7)(C),(b)(7)(F)
DDO - Middle East/East Africa
Removal Management Division
Enforcement and Removal Operations
318-40 (mobile)

From (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Monday, August 18, 2025 2:35 PM
To (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: SHRC (b)(7)(E) | Egypt-Qatar-India | Itinerary Review

Updated manifest

(b)(6),(b)(7)(C),(b)(7)(F)
DDO - Middle East/East Africa
Removal Management Division
Enforcement and Removal Operations
318-40 (mobile)

We will need SHRC packets for all 3 cases and they will need to transferred from their respective detention facilities to ASF.

Thank you.

(b)(6),(b)(7)(C),(b)(7)(F)
SDDO – Movement Operations – Commercial Air
Philadelphia Field Office – York, PA Sub-Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
(215) 828 [redacted] Mobile)

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Friday, September 26, 2025 12:36 PM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: FW: Assistance with Iranian Manifest Cases for LRIF Mission (b)(7)(E)

Good afternoon SDDO (b)(6),(b)(7)(C),(b)(7)(F)

FYSA, please refer to the email below. Thank you

(b)(6),(b)(7)(C),(b)(7)(F)
Supervisory Detention and Deportation Officer
San Francisco Field Office
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
TDY - ERO New Orleans / Adams County Detention Center
630 Sansome Street
San Francisco, CA 94111

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From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Friday, September 26, 2025 12:33 PM
To: DOC (b)(7)(E) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: Assistance with Iranian Manifest Cases for LRIF Mission (b)(7)(E)

Good afternoon,

The Iran Embassy just issued passports or travel documents for the three listed below. They requested they be added to the flight leaving out on the 29th. All 3 are housed in facilities within the NOL Field Office. DDO (b)(6),(b)(7)(C),(b)(7)(F) will bring the originals with her to the flight.

(b)(6),(b)(7)(C)

Subject ID : (b)(6),(b)(7)(C)
WINN CORRECTIONAL CENTER

(b)(6),(b)(7)(C)

Subject ID : (b)(6),(b)(7)(C)
ADAMS COUNTY DET CENTER

(b)(6),(b)(7)(C)

Subject ID (b)(7)(E)
ADAMS COUNTY DET CENTER

(b)(6),(b)(7)(C),(b)(7)(F)
DDO - Middle East/East Africa
Removal Management Division
Enforcement and Removal Operations
318-40 [redacted] (mobile)

From: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Sent: Wednesday, September 24, 2025 5:08 PM
To: DOCC (b)(7)(E) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: RE: Assistance with Iranian Manifest Cases for LRIF Mission (b)(7)(E)

(b)(6),(b)(7)(C),(b)(7)(F)
DDO - Middle East/East Africa
Removal Management Division
Enforcement and Removal Operations
318-40 [redacted] (mobile)

From: DOCC (b)(7)(E) @ice.dhs.gov>
Sent: Wednesday, September 24, 2025 2:47 PM
To: (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Cc: DOCC (b)(7)(E) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov> (b)(6),(b)(7)(C),(b)(7)(F)
(b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>; (b)(6),(b)(7)(C),(b)(7)(F) @ice.dhs.gov>
Subject: Assistance with Iranian Manifest Cases for LRIF Mission (b)(7)(E)

Greetings DDO (b)(6),(b)(7)(C),(b)(7)(F)

Thank you for providing the manifests. The DOCC has allocated the Egyptian and Iranian aliens listed in the attachments to the removal mission LRIF Mission # (b)(7)(E) (Qatar, Egypt, and Jordan).

Could you kindly assist by providing the removal offices for the cases on the Iranian manifest? This information will allow us to notify the respective offices that their cases have been allocated for the upcoming mission and ensure the individuals are positioned at the staging location ahead of the mission's launch date.

Thank you for your time and support.

Declaration of D.K.

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted], hereby declare under penalty of perjury, pursuant to 28 U.S.C. 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information, and I believe it to be true.

On or about July 7, 2026 I was called by the detention officer to have a visit by I.C.E officer for my monthly paperwork which relates to my removal process by the title of "warning of failure of departure (I think I-229)"

Due to my concern of sending me back to Iran I asked the I.C.E officer who filled my paperwork to check my last update on my status by the I.C.E portal.

There were more than 6 I.C.E officer in the place I was called. Officer C. Zapata checked my personal profile and showd me he found the last update shows I am on a "SHRC" flight to Iran for "late July" without any exact date or any other

details. And all of the other officers were surprised because of removing Iranian citizens to their home country under war conditions.

Before being called by I.C.E, I was made aware by other Iranian detainees in El Valle Detention facility about this flight because of one of the denied habeas corpus file of Iranian who was in removal: and the reason of denying the case was a filing by DHS which stated that there is a flight to Iran to remove the Iranian citizens

After being informed by I.C.E I tried to contact the consulate of Iran to make sure about the flight and find a way to survive based on the internal condition of country and war status.

They ~~confirmed~~ Confirmed the flight is real and mentioned they working on sending throw Egypt or Qatar (as I remember).

But they recommended me to find and away and try to stay and don't go back to Iran.

Executed on September 24, 2026

at Detention Facility of El Valle, Raymondville, Texas

Signature: [redacted]

Declaration of F.B.

DECLARATION OF [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Commissions, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted]), hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge, except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information and I believe it to be true.

Background

1. I am a citizen of Iran. I entered the United States in November 2024 through a scheduled CBP One appointment and have been detained by U.S. Immigration and Customs Enforcement ("ICE") since then. I am currently detained at the El Valle Detention Facility in Raymondville, Texas.

2. The conversations I describe in this declaration took place in Farsi (Persian), my native language, except where I say otherwise. Quotations are my best recollection of what was said, translated into English.

3. I have been convicted in absentia by an Iranian Revolutionary Court of political offenses and sentenced to Prison [redacted]. A certified copy of that judgment is part of my immigration case record. My father, [redacted], is a high ranking official in the government of the Islamic Republic of Iran. My mother, [redacted] is an asylee and was released from immigration detention.

My Asylum Case and the Confidential Information in It

4. I am an applicant for asylum, withholding of removal, and protection under the Convention Against Torture. In connection with my asylum case I disclosed detailed information to the United States government about my identity, my family — including my father's position and my mother's case — my political opinions, my conviction and sentence in Iran, and the reasons I fear the regime, in reliance on the confidentiality protections of U.S. law and the U.S. government's assurances that this information would not be shared with the Iranian regime or its agents.

[redacted]

Contacts from the Iranian Interests Section

5. During my detention I have been contacted by the Interests Section of the Islamic Republic of Iran in Washington, D.C. (the "Interests Section") on more than one occasion, [redacted]. I never asked for any of these contacts. these contacts are initiated by [redacted] officers asking me to go to a kiosk at "back asylum" to speak with ICE that has phones. I came waiting for the call and when I answered, there was a woman who introduced herself as [redacted] from Iranian Interest section in washington.

The Telephone Call ICE Arranged with [redacted]

[redacted]

7. During the call, [redacted] told me, in Farsi, "ICE gave us your case." She also told me that they knew my mother had been released from immigration detention and that I was now alone in detention. She told me that they want me return to Iran. I had never given the Interests Section any information about myself, my mother, or my case.

8. [redacted] also told me that they had prepared a new passport for me. I already held a valid Iranian passport. I never applied for a new Iranian passport, never signed any application, never provided a photograph, and never authorized anyone to apply on my behalf. ~~[redacted]~~

ICE Tells Me I Am on the List for the End-of-July Flight to Iran

9. On or about June 2026 ICE [redacted] told me that there is a chartered flight to Iran, [redacted] that I was on a list of deportees and that I would be deported on a flight to Iran at the end of July 2026.

I told my mother about this in a telephone call ~~[redacted]~~ afterwards. ~~[redacted]~~ Later, [redacted] my mother told me that someone from [redacted] office had called her to say my passport had already been issued and that I would soon be deported.

10. The flight to Iran at the end of July 2026 did not take place. About the end of July ICE officers told me the flight has been cancelled. [redacted]

[redacted]

The Message About [redacted] (July 13, 2026)

11. On or about July 13, 2026, I received a message relayed to me indirectly. A person who was deported from the United States to Iran on the January 2026 removal flight contacted other Iranian detainees at El Valle asked them to pass a message to me. [redacted] Through those detainees, I was given the name, telephone number, and address of a person identified as [redacted] and was asked to contact him. I understand that [redacted] works at the Interests Section. I did not contact [redacted]

The Interests Section Arranges Pakistani Visas (August 26, 2026)

12. On or about August 26, 2026, [redacted], an Iranian detainee held in my pod at El Valle, told me that a representative of the Interests Section had told him in a telephone call that same day that Iran had asked Pakistan to issue visas for him, for me, and for a few other Iranian detainees so that we could be moved to Pakistan and from Pakistan to Iran. He told me that [redacted]

I believe what he told me to be true. I called my mother the same day and told her what [redacted] had told me. My mother later told me that she called the Interests Section herself and that a woman who identified herself as [redacted] confirmed to her that they had asked the Pakistani embassy for a visa for me and a few others, and that the visa would probably be issued within about two weeks.

13. [redacted] I have never requested a visa from Pakistan [redacted], and I have never consented to being sent to Pakistan [redacted] No one from the U.S. government has ever asked me about getting or applying for a visa for Pakistan. [redacted]

Consent

14. I have never contacted the Interests Section of the Islamic Republic of Iran, and I never asked for any of the contacts described above. I have never given the Interests Section, or any other arm of the regime, permission to receive information about me, my detention, my immigration case, my asylum claim, or my family. No one from the United States government ever asked for my consent to share information about me or my case with the regime or its representatives, and I never consented.

[redacted]

My Fear

15. I did not consent to any of these contacts, and I do not want to be returned to Iran, directly or through Pakistan or any other country. Based on the contacts described above, the preparation of a passport I never requested, ICE placing me on a removal flight, and the arrangement of Pakistani visas, I believe that my removal may be imminent and that the regime and ICE are working together to return me. If I am returned to Iran, I face the sentence already imposed on me. My father, beat me so severely while I was in Iran that both of my wrists were broken Because the regime now knows where I am, that I sought protection from it, and that my mother is no longer detained with me, I believe that if I am returned I will be imprisoned, tortured, and possibly killed.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, under the laws of the United States of America, and for all relevant international bodies and courts of competent jurisdiction, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on: september 29, 2026

Location: El Valle Detention center

Signature: [redacted]

[redacted]

Declaration of G.W.

DECLARATION OF [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, Commissions, Committees, and Other Relevant Bodies or Courts of Competent Jurisdiction

I, [redacted]), hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information, and belief. The facts stated below are based on my own personal knowledge, except where I indicate that a statement is made on information I received from another person; where I do, I identify the source of the information and I believe it to be true.

Background

1. I was born on [redacted] in Iran. On November 19, 2013, I began studying Computer Science [redacted] University, Naein branch. In March 2023, I met a woman at the gym who introduced me to Christianity. I began attending weekly house churches with her, and by March 2024 I considered myself a Christian. I was baptised in Nov. 2024. [redacted]

2. On October 29, 2024, while leaving from home for work, three plainclothes IRGC officers — two men and one woman — stopped me outside my home. They blindfolded me, took me to an unknown location, and beat and psychologically tortured me. On October 30, 2024, I was taken to the Evin Revolutionary Court. My brother and his friend posted a one-billion-toman bail for my release. Terrified and in pain, I decided to flee Iran.

My Asylum Case and the Confidential Information in It

3. I entered the United States [redacted] and have been detained since. I am currently detained at the El Valle Detention Facility in Raymondville, Texas. I am applicant for asylum, withholding of removal, and protection under the Convention Against Torture in. My claim is based on my conversion to Christianity and my participation in house churches in Iran, and on my detention and beating by IRGC officers and my appearance before the Evin Revolutionary Court described above. In connection with my asylum case I disclosed to the United States government detailed information about my identity, my family, my religious conversion, the people with whom I worshipped, my detention and the case against me in Iran, and the reasons I fear the regime, in reliance on the confidentiality protections of U.S. law and the U.S. government's assurances that this information would not be shared with the Iranian regime or its agents.

[redacted] 1

ICE Tells Me I Am on the List for the July 2026 Charter Flight to Iran

4. On or about [redacted] early July 2026, about a dozen ICE officers entered my dorm at El Valle and called me by my [redacted] Name. An older male ICE officer read from his mobile device that I was on the list of deportees for a charter flight to Iran at the end of the month, and he showed me on his device what I believe was the name of the flight. Alongside me, another detainee [redacted] was called by her ICE officer and told the same, that she would be on a flight to Iran at the end of the month, July 2026. [redacted]

5. [redacted] Later that month, at the end of July, I recieved a message on my messaging system from ICE that [redacted] you will not be on this flight anymore, we are trying to put you on another flight soon. [redacted]

What [redacted] was Told

6. Earlier that same day, [redacted], an Iranian man detained at El Valle, told me that he had received a call from a woman named [redacted] at the Iranian "consulate," which I understand to be the Interests Section of the Islamic Republic of Iran in Washington, D.C. (the "Interests Section"). He told me that she said there was a charter flight to Iran at the end of July and that he was on the list that ICE had given to the Interests Section. I believe what he told me to be true.

[redacted]

[redacted]

Consent

9. [redacted]. I have never given the Interests Section, or any other arm of the regime, permission to receive information about me, my detention, my immigration case, or my asylum claim. No one from the United States government ever asked for my consent to share information about me or my case with the regime or its representatives, and I never consented.

My Fear

10. I fled Iran because IRGC officers detained, blindfolded, beat, and psychologically tortured me and brought me before the Evin Revolutionary Court for my Christian faith. [redacted] Learning that ICE had given the regime's office a list of Iranian detainees with my name on it, [redacted] terrified me.

If I am returned to Iran, I believe I will be arrested on arrival for the pending case against me and for leaving Islam, and that my brother, who posted my bail, and the people I worshipped with will face reprisal. I am terrified that my family is indanger for this illegal information sharing.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, under the laws of the United States of America, and for all relevant international bodies and courts of competent jurisdiction, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on: September 29, 2026

Location: El Valle Detention Facility

Signature: [redacted]

Declaration of J.H.

DECLARATION OF [redacted]

For Submission to U.S. Courts, Immigration Authorities, International Human Rights Tribunals, committees, commissions, or relevant bodies, and other courts, tribunals, or committees, in other jurisdictions:

I, [redacted] pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. My name is [redacted]). I am over the age of eighteen and competent to make this declaration. Except where I state that a fact is based on information I received from another person, the facts below are based on my personal knowledge. Where I describe information I received from others, I identify the source of that information, and I believe it to be true. If called as a witness, I could and would testify to these facts.

2. I make this declaration to describe what has happened to my family and the danger my son, [redacted], faces if he is returned to Iran. As I describe below, the government of the Islamic Republic of Iran (the "regime") issued my son a passport that he never requested. A caller from the regime's office in Washington, D.C. telephoned me, unsolicited, to tell me that my son would soon be deported — before ICE had told my son anything. A deportation flight to Iran was then scheduled for the end of July 2026 and was canceled only because hostilities resumed. And the regime's office has now confirmed to me that it has arranged for Pakistan to issue visas so that my son and other Iranian detainees can be moved to Iran through Pakistan.

MY BACKGROUND

3. I am an asylee from Iran. I currently reside in Las Vegas, Nevada. My alien registration number is [redacted]

[redacted]

4. I am the mother of [redacted] is currently detained by U.S. Immigration and Customs Enforcement ("ICE") at the El Valle Detention Facility in Raymondville, Texas.

5. [redacted] father is my former husband, [redacted] We divorced approximately twenty years ago. He is a high-level official of the Islamic Republic of Iran.

6. I have long been an active and outspoken opponent of the regime, and I participated in protests against it in Iran.

MY ARREST, TORTURE, AND DEATH SENTENCE IN IRAN

7. I was arrested in Iran during the so called Aban 1398 protests of October and November 2019.

8. While detained, I was tortured extensively — so extensively that I lost the ability to bear children. Because of my former husband's influence within the regime, my treatment was especially severe. During my detention in Iran, I even heard my former husband's own voice [redacted] inside the room in which I was being tortured, although I was blindfolded. [redacted]

9. I have been sentenced in Iran to death by hanging, on charges of acting against the national security of the regime, spreading propaganda against the regime and working with foreign media, and slandering regime officials and the Supreme Leader.

THE REGIME'S SENTENCE AGAINST [redacted] AND HIS FATHER'S VIOLENCE

10. While [redacted] was still in Iran, his father beat him severely, breaking and shattering his wrists.

11. After [redacted] fled Iran, an Iranian court convicted him of working against the regime and sentenced him to seven years of imprisonment and ninety-nine lashes.

[redacted]

THE REGIME CALLS ME ABOUT MY SON'S DEPORTATION — BEFORE ICE TELLS HIM

12. In or about early June 2026, I received a telephone call from the office of [redacted], the Director of the Iranian Interest Section in Washington on a number I did not recognize. I had never contacted that number, and I had never given my telephone number to the Interests Section of the Islamic Republic of Iran in Washington, D.C. (the "Interests Section").

13. The caller told me: "We have already issued [a] passport for [redacted] and will soon get him deported." At the time of this call, ICE had not yet told [redacted] that he would be deported at the end of July 2026. The regime told me before the United States told my son. I understood the call as another attempt by the regime to intimidate [redacted] and me, and I believe it was encouraged by my former husband.

ICE PUTS [redacted] ON A LIST TO BE DEPORTED TO IRAN AT THE END OF JULY 2026

14. Later in June 2026, [redacted] told me in a telephone call from detention that ICE had told him that he is on a list of deportees and that he was to be deported on a flight to Iran at the end of July 2026.

15. That flight to Iran was canceled when hostilities — including the bombing of Iran — resumed at the end of July 2026.

[redacted] FATHER MOVES TO BRING HIM BACK TO IRAN

16. In June 2026, around the same time that ICE told [redacted] he would be deported, [redacted] went to the home of my mother — [redacted] maternal grandmother — in Iran. My mother told me about the visit. He told my mother that he was going to bring [redacted] back, and told my mother that "you will see what I will do to him — the worst you can imagine."

[redacted]

17. My family has already submitted a declaration in [redacted] immigration case describing many similar incidents in which [redacted] father threatened my family, [redacted] and me — saying that he would soon get [redacted] back, that he had pushed for [redacted] passport to be issued expeditiously, and that he would leave [redacted] mother grieving for her son.

THE REGIME ARRANGES PAKISTANI VISAS TO MOVE IRANIAN DETAINEES TO IRAN THROUGH PAKISTAN

18. On or about August 26, 2026, [redacted] called me from detention and told me the following: [redacted] an Iranian detainee held in [redacted] pod at El Valle, had told [redacted] that a representative of the Iranian Interests Section had told [redacted] in a telephone call that same day, that Iran had asked Pakistan to issue visas for [redacted] for [redacted] and for a few other Iranian detainees, so that they could be moved to Pakistan and from Pakistan to Iran — a chain refoulement.

19. After [redacted] call, out of concern and fear, I telephoned the Interests Section myself to see if I could get more information and to ask whether what [redacted] had heard was true. A woman who identified herself as [redacted] answered my call and confirmed that it was. She told me that the Iranian regime "has asked the Pakistani embassy for a visa for [redacted] and a few other[s]," and that the visa would probably be issued within two weeks. She also told me that [redacted] would be moved to Pakistan and sent on to Iran from there.

20. No one asked for [redacted] consent to any of this, and [redacted] has never consented to being sent to Pakistan or returned to Iran. I emphasized to [redacted] that [redacted] has not requested any visa from Pakistan.

MY FEAR FOR MY SON'S LIFE

21. I know what the regime does to those it has condemned, because it did some of it to me — and it has condemned me to death. And I know what [redacted] father is capable of: he beat my son until his wrists were broken and shattered; his influence is the reason my own torture was so severe; and he has promised to do to [redacted] "the worst you can imagine" and to leave me grieving for my son. [redacted] already stands convicted, with seven years of imprisonment and ninety-nine lashes waiting for him in Iran. If [redacted] is returned to Iran — on a direct flight or through Pakistan — I believe he will be severely tortured or killed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 08/30/2026
Location: Lasvegas. Nevada

Signature: [redacted]

[redacted]