

**ORIGINAL**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 13-20772

Plaintiff,

HONORABLE GERSHWIN A. DRAIN

v.

RASMIEH YOUSEF ODEH,

Defendant.

**F I L E D**  
**MAR 12 2015**

CLERK'S OFFICE  
U. S. DISTRICT COURT  
EASTERN MICHIGAN

**DEFENDANT'S STATEMENT IN SUPPORT OF  
JUDICIAL ORDER OF REMOVAL**

Rasmieh Yousef Odeh, defendant in the above-captioned criminal proceeding, here states as follows:

1. My true and correct name is Rasmieh Yousef Odeh. I am also known as Rasmieh Joseph Steve.
2. I received a Notice of Intent to Request Judicial Removal ("Notice"), dated March 10, 2015. I am the person identified in that document. I hereby waive all of my rights, pursuant to Section 238(c)(2)(A) of the Immigration and Nationality Act of 1952, as amended ("INA"), 8 U.S.C. § 1228(c)(2)(A), including but not limited to have the Notice served upon me prior to the commencement of the trial.
3. I received the Factual Allegations in Support of Judicial Removal, as

stated in the Notice of Intent to Request Judicial Removal (“Allegations”), dated March 10, 2015. I hereby waive my right, pursuant to Section 238(c)(2)(B) of the INA, 8 U.S.C. § 1228(c)(2)(B), to have the allegations served 30 days prior to sentencing.

4. My rights in a judicial removal proceeding have been fully explained to me by my attorney, Michael Deutsch. After consultation with counsel and understanding the legal consequences of doing so, I knowingly and voluntarily waive the right to the notice and hearing provided for in Section 238(c)(2) of the INA, 8 U.S.C. § 1228(c)(2), and further waive any and all rights to appeal, reopen, reconsider, or otherwise challenge this order. I understand the rights I would possess in a contested administrative proceeding and I waive these rights, including my right to a hearing before an immigration judge or any other authority under the INA, on the question of my removability from the United States, to examine the evidence against me, to present evidence on my own behalf, and to cross-examine witnesses presented by the United States. I understand these rights and waive further explanation by the Court.

5. I hereby admit that all of the factual allegations set forth in the Notice of Intent to Request Judicial Removal and concede that the allegations are true and correct as written.

6. If my conviction for unlawfully procuring my naturalization as a

United States citizen is affirmed on appeal, I hereby concede that I am removable from the United States pursuant to Section 237(a)(1)(A) of the INA, 8 U.S.C. § 1227(a)(1)(A), as an alien described in Section 212(a)(6)(C)(i) of the INA, 8 U.S.C. § Title 8 §1182(a)(6)(C)(i).

7. I hereby waive any and all rights I may have to any and all forms of relief or protection from removal, deportation, or exclusion under the INA, as amended, and related federal regulations. These rights include, but are not limited to, the ability to apply for the following forms of relief or protection from removal: asylum; withholding of removal under Section 241(b)(3) of the INA, 8 U.S.C. § 1231(b)(3); any protection from removal pursuant to Article 3 of the United Nations Convention Against Torture, including withholding or deferral of removal under 8 C.F.R. §§ 208.16-17 and 1208.16-17, cancellation of removal; adjustment of status; registry; de novo review of a denial or revocation of temporary protected status (current or future); waivers under Sections 212(h) and 212(i) of the INA, 8 U.S.C. §§ 1182(h), 1182(i); visa petitions; consular processing; voluntary departure or any other possible relief or protection from removal available under the Constitution, laws or treaty obligations of the United States. I acknowledge that I have not been persecuted in, and have no present fear of persecution in Jordan, the country of my nativity and citizenship. I further acknowledge that I have not been tortured in, and have no present fear of torture in Jordan, the country

of my nativity and citizenship.

8. I consent to the introduction of this statement as an exhibit in the record of these judicial removal proceedings. I further agree to make the judicial order of removal a public document, waiving my privacy rights, including any privacy rights that might exist under 8 C.F.R. § 208.6. As a result of the above-referenced order, upon the completion of my criminal proceedings, including any sentence of incarceration and any court-imposed supervision, I understand that I shall be removed to Jordan.

9. I agree to assist U.S. Immigration and Customs Enforcement (“ICE”) in the execution of my removal. Specifically, I agree to assist ICE in the procurement of any travel, identity, or any other documents necessary for my removal; to meet with and to cooperate with representatives of any country to which I may by statute be removed if ICE so requests; and to execute any forms, applications, or waivers needed to execute or expedite my removal. I agree to take all steps necessary to maintain a valid and unexpired Jordanian passport. I further understand that my failure or refusal to assist ICE in the execution of my removal may subject me to criminal penalties under Section 243 of the INA, 8 U.S.C. § 1253, and further administrative detention under INA.

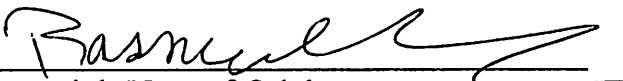
10. I concede that the entry of this judicial order of removal renders me inadmissible to the United States. I agree that I will not enter, attempt to enter, or

transit through the United States without first seeking and obtaining permission to do so from the Secretary of the Department of Homeland Security or other designated representative of the U.S. government.

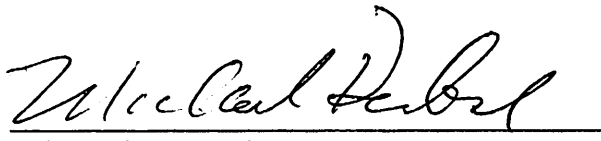
11. Pursuant to Section 238(c)(3)(A)(iii), 8 U.S.C. § 1228(c)(3)(A)(iii), I understand and agree that upon affirmance on appeal of my conviction for unlawfully procuring United States citizenship in violation of 18 U.S.C. § 1425(a), the order of removal shall become final and shall be executed at the end of the prison term in accordance with the terms of the order. If the conviction is reversed on direct appeal, I understand that the order of removal shall be void.

12. I agree to the entry of a judicial order of removal pursuant to Section 238(c)(1) of the INA, 8 U.S.C. § 1228(c)(1). I will accept a written order issued by this Court for my removal from the United States to Jordan, and I waive any and all rights to challenge any provision of this agreement in any U.S. or foreign court or tribunal.

3/12/15  
Date

  
Rasmieh Yousef Odeh  
Defendant

3/12/15  
Date

  
Michael Deutsch  
Attorney for the Defendant

*Homeland Security Investigations  
Office of the Special Agent in Charge*

477 Michigan Avenue, Suite 1850  
Detroit, Michigan 48226



**Homeland  
Security**

**Concurrence of the Department of Homeland Security**

On behalf of the Assistant Secretary of Immigration and Customs Enforcement, I concur in the request by the U.S. Attorney that a judicial order of removal be entered against Rasmieh Yousef Odeh, a/k/a Rasmieh Joseph Steve, Alien Number A044 688 871, pursuant to Title 8, United States Code, Section 1228(c)(5).

Date: March 2, 2015

A handwritten signature in blue ink that reads "Marlon V. Miller".

Marlon V. Miller  
Special Agent in Charge  
Homeland Security Investigations  
Immigration and Customs Enforcement