

25 CV 60333

ALEXEY SAMOKHIN, DETEINED

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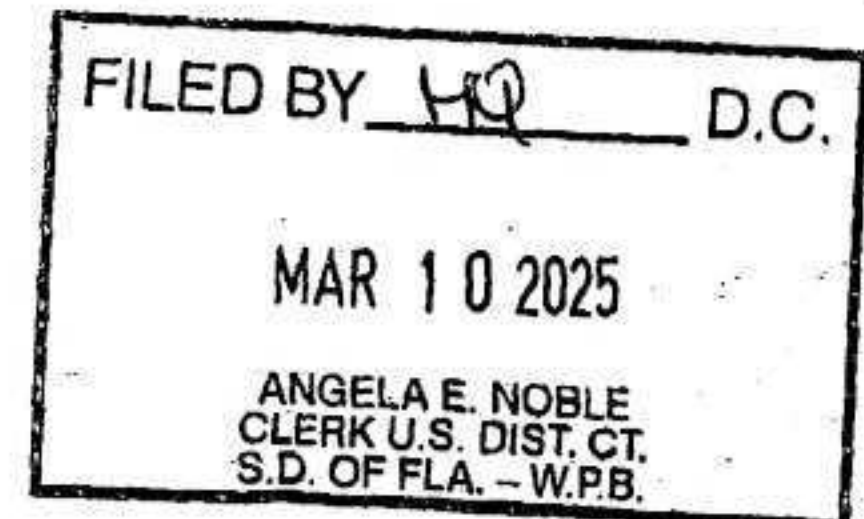
Broward Transitional Center, FL

Case 11-2024-CT-001820-AXXX-01

in the County Court, Twentieth Judicial Circuit, FL

HONOR JUDGE ROB CROWN

PETITION



Honor Court, I have been in custody in Broward Transitional Center since 06/12/2024, for 9 long months. In June 2024, I paid a Lawyer Bruce Prober \$5000 for my defense in Court but I have not had contact with him all this time and I do not know how my trial is going, he does not answer my letters.

Considering the long term of my arrest (more than 9 months), I ask Honor Court to end proceeding on my case and acquit me, I do not admit my guilt.

I ask to Change the option of my notification about my case, I can not receive email, so I ask to always notify me at the postal address: [REDACTED] 33160.

Sincerely, Alexey Samokhin

March 5, 2025

FLORIDA INDIVIDUAL ACKNOWLEDGMENT
F.S. 117.05(1) - Effective January 1, 2020

State of Florida

County of Broward

The foregoing instrument was acknowledged before me by means of

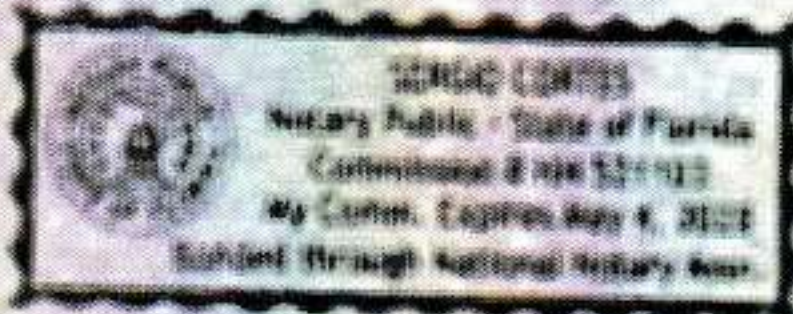
☒ Physical Presence,

— OR —

☐ Online Notarization.

this 05 day of March, 2025 by
Date Month Year

Alexey Smekhin
Name of Person Acknowledging



Sergio Cortes
Signature of Notary Public - State of Florida



Sergio Cortes
Name of Notary Typed, Printed or Stamped

☐ Personally known

☒ Produced Identification

Type of Identification Produced A-230958621

Broward Transitional Center

Place Notary Seal Stamp Above

OPTIONAL

Completing this information can draw attention to the document or
fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document Petition to the Court, Judge Rob Crown

Document Date 3-5-2025 Number of Pages One Page

Signer(s) Other Than Named Above None

STATE OF FLORIDA

vs.

Alexey Samokhin

Case Number 11-2024-CT-001820-AXXX-01
Judge Rob Crown

Notice of Appearance for:
Pre-Trial (Private Attorney)

NOTICE TO APPEAR

The above matter shall be heard at the Collier County Court on following dates:

Court Event Type	Court Event Date	Court Event Time	Court Location
Pre-Trial (Private Attorney)	3/26/2025	9:00 AM	RC Naples

The above named Defendant is ORDERED TO APPEAR at the above time and place before the Judge of the County Court. Court House address: [REDACTED]

The Defendant is required to attend these court event(s) unless the Court specifically approves his/her absence. Failure of the defendant to appear will result in the Bond being forfeited and may result in a warrant being issued.

Defendant not present; notice mailed/emailed.

Date 01/27/2025

Copies sent or emailed to:

Alexey Samokhin
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

This notice is pursuant to Florida Statute 316.193 (8): Upon conviction of Florida Statute 316.193, the court shall suspend or revoke your driver's license. You should make arrangements for transportation at any proceeding in which the court may take such action.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Charles Rice, Administrative Services manager whose office is located at 3315 East Tamiami Trail, Suite 501, Naples, Florida 34112, and whose telephone number is (239) 252-8800, at least 7 days before your scheduled court appearance or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.



Alexey SAMOKHIN
A-231958681
Broward Transitional Center,
3900 N Powerline road,
Pompano Beach, FL,
33073

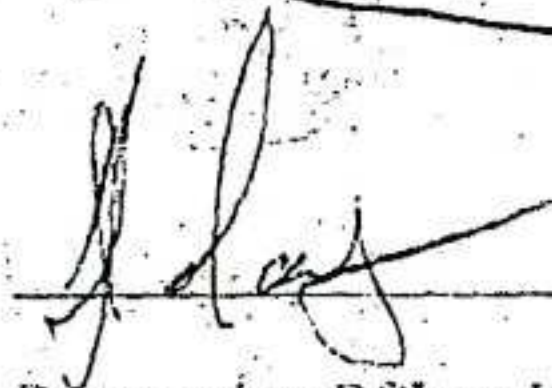
3315 East Tamiami Trail
Suite 501, Naples,
FL, 34112
to Charles Rice
c/o Judge Rob Crowe
11-2024-CT-001820-AXX

8. Petitioner has received custody reviews pursuant to 8 C.F.R. § 241.4. On February 7, 2025, Petitioner was served with the Notice to Alien of File Custody Review.

9. ICE has a valid travel document for Petitioner.

10. Petitioner was previously scheduled for removal to Russia, but due to flight delays, Petitioner missed his connecting flight and was forced to return to BTC. Petitioner is rescheduled to be removed from the United States to Russia within the next 30 days. ICE routinely removes noncitizens via commercial flights to Russia, subject to availability. Inasmuch as there is no issue regarding Petitioner's nationality, I believe there is a significant likelihood of Petitioner's removal in the reasonably foreseeable future.

I declare under penalty of perjury that the foregoing is true and correct.



Deportation Officer John Mansey

Dated: 2/26/2025

DALCE

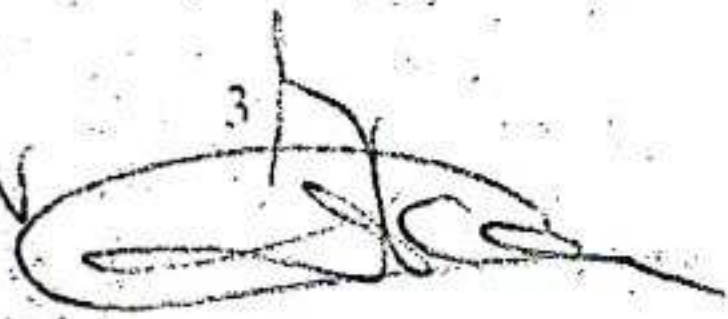
Notice of Protest.

The ICE Officer John Mansey is lying under oath and giving false information to Federal Court Florida.

There was no flight!

I have never been taken out of Broward Transitional Center in 9 months.

Alexey Samoylov



03/05/2025

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 25-60333-CV-MIDDLEBROOKS

ALEXEY SAMOKHIN,

Petitioner,

v.

WARDEN, BROWARD TRANSITION CENTER, et al.,

Respondent(s).

DECLARATION OF DEPORTATION OFFICER JOHN MANSEY

I, John Mansey, hereby declare:

1. I am a Deportation Officer for Enforcement and Removal Operations (ERO), Immigration and Customs Enforcement (ICE), U.S. Department of Homeland Security, (DHS). I am assigned to Detained Case Management at the Broward Transitional Center (BTC) located in Pompano Beach, Florida. I have been employed by ICE since December 20, 2009.

2. Aliens who are in exclusion, deportation, or removal proceedings under the Immigration and Nationality Act are detained at Service Processing Centers or other detention locations under the authority of ICE, as are those who are pending appeal results from the Board of Immigration Appeals (BIA), or those with administrative final orders of removal who are being processed for removal to their native countries.

3. Alexey Samokhin (Petitioner) is currently detained at the BTC located in Pompano Beach, Florida. I am familiar with his case based on my review of his administrative file and the

information detailed in ICE's electronic databases. The purpose of this declaration is to provide information to the Court regarding Petitioner's removal status.

4. Petitioner is a native and citizen of Russia. Petitioner was admitted to the United States at Miami, Florida on or about April 14, 2022, as a B2 visitor for pleasure, with authorized stay in the United States until October 13, 2022.

5. On June 9, 2024, Petitioner was arrested in Naples, Collier County, Florida for Driving Under the Influence of Alcohol in violation of Florida Statutes § 316.193. The case is pending before the County Court for the Twentieth Judicial Circuit, in and for Collier County, Florida.

6. On June 10, 2024, Petitioner was taken into ICE custody, pursuant to Warrant of Arrest. On June 11, 2024, Petitioner was placed into removal proceedings upon service and filing of a Notice to Appear (NTA). The NTA charged Petitioner with removability pursuant to § 237(a)(1)(B) of the Immigration and Nationality Act, as amended, in that after admission as a nonimmigrant under §101(a)(15) of the Act, Petitioner remained in the United States for a time longer than permitted, in violation of the Act or any other law of the United States.

7. On November 1, 2024, the immigration judge denied the Petitioner's application for relief and ordered Petitioner removed to Russia. The court's order reserved Petitioner's right to appeal the order of removal to the Board of Immigration Appeals (BIA), the administrative appellate body having jurisdiction to review the decision. On November 14, 2024, Petitioner, through counsel, filed a motion with the immigration court, requesting the issuance of a final removal order, indicating Petitioner would not be appealing the immigration judge's removal order. On November 14, 2024, the immigration judge re-issued the November 1, 2024, removal order indicating that Petitioner waived appeal.

[illegible][illegible]

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Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains.