

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

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|------------------------|---|------------------------------|
| ABDIKHALAQ MOHAMED ALI |) | CIVIL ACTION NO. 25-cv-00419 |
| |) | SEC. P |
| |) | |
| VERSUS |) | JUDGE DOUGHTY |
| |) | |
| JUSTIN WILLIAMS, ET AL |) | MAGISTRATE JUDGE PEREZ- |
| |) | MONTES |

ANSWER AND RETURN TO PETITION
FOR A WRIT OF *HABEAS CORPUS*

Federal Respondents, in their official capacities, in response to the application for a writ of *habeas corpus* filed by the Petitioner, Abdikhalaq Mohamed Ali, do hereby allege and aver as follows:

ADMITTED FACTS

Those facts set forth within the Memorandum of Law, filed contemporaneously with this Answer, are incorporated and alleged herein by reference.

FIRST DEFENSE

The jurisdiction of this Court extends solely to Abdikhalaq Mohamed Ali's pure claim relating to his continued detention by the United States Immigration and Customs Enforcement.

SECOND DEFENSE

Abdikhalaq Mohamed Ali has failed to state a claim upon which relief can be granted. More particularly, Abdikhalaq Mohamed Ali has failed to establish that

there is no significant likelihood of his removal in the reasonably foreseeable future.

THIRD DEFENSE

Abdikhalaq Mohamed Ali is a native and a citizen of Ethiopia ordered removed from the United States of America as inadmissible for failure to possess a valid immigrant visa, border crossing identification card, or reentry permit. 8 U.S.C. § 1182(a)(7)(A)(i)(I). Petitioner remains in ICE custody because he has hampered his removal, effectively tolling the statutory period of removal. Despite Petitioner's efforts to delay his removal, Ethiopia has issued a travel document for Petitioner and his removal is imminent. Thus, the continued detention of Abdikhalaq Mohamed Ali pending his removal from the United States of America comports with all statutory and regulatory provisions governing the detention of aliens pending removal from the United States of America.

FOURTH DEFENSE

All allegations of fact not otherwise admitted to or conceded within this answer or the attached memorandum in support of this answer are denied.

WHEREFORE, it is prayed that this answer and return to the application for the issuance of a writ of *habeas corpus* filed by Abdikhalaq Mohamed Ali be deemed sufficient and, after due proceedings are had and for the reasons set forth within the Memorandum of Law filed with this answer, the petition should be dismissed with prejudice. It is further prayed that all legal and equitable relief that the named Respondents may otherwise be entitled to issue forthwith.

Respectfully submitted,

ALEXANDER C. VAN HOOK
Acting United States Attorney

BY: s/ Karen J. King
KAREN J. KING (#23508)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 11, 2025, a copy of the foregoing *Federal Respondents' Answer and Return to Petition for Habeas Corpus* was filed electronically with the Clerk of Court using the CM/ECF system. I further certify that a copy of same has been forwarded via first class mail, postage prepaid and properly addressed to *pro se* Plaintiff as follows:

Abdikhalag Mohamed Ali

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Winn Correctional Center
560 Gum Springs Rd
Winnfield, LA 71483

s/ Karen J. King
KAREN J. KING (#23508)
Assistant United States Attorney