

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JORGE ARMANDO OLAYA)	
RODRIGUEZ,)	
)	
Petitioner,)	
)	
v)	Civil Action No. 1:25cv791
)	
PAMELA BONDI,)	
In her official capacity as Attorney General)	
Of the United States, et al ,)	
)	
Respondents.)	

**NOMINAL RESPONDENT JEFFREY CRAWFORD’S
RESPONSE TO THE AMENDED PETITION FOR WRIT OF HABEAS CORPUS**

COMES NOW Jeffrey Crawford (“Crawford”), a nominal respondent named in this case, by counsel, and responds to the Amended Petition for Writ of Habeas Corpus (“Amended Petition,” ECF No. 13) pursuant to the Court’s Order entered May 9, 2025 (ECF No. 4). In response to the Amended Petition, Crawford represents the following to the Court:

1. Crawford, identified in the Amended Petition as “the Warden of Farmville Detention Facility,” serves as the Director of the Farmville Detention Center. (Am. Pet. at 5 ¶ 32.) Although his title is not “Warden” as alleged, he essentially serves in that role as the Director of the Farmville Detention Center.

2. The Farmville Detention Center is owned and operated by Abyon, LLC (“Abyon”). Abyon is a private company and is not a federal, state, or local agency. Rather, Abyon provides services to the United States Immigration and Customs Enforcement (“ICE”) under a contract.

3. Relevant to the allegations concerning Crawford, the Amended Petition alleges that Respondent “is now detained at the Farmville Detention Center in Farmville, Virginia,” (Am. Pet.

at 4 ¶ 18), and that “Respondent Jeffrey Crawford...is directly responsible for Mr. Olaya’s Custody. He is sued in his official capacity.” (Am Pet. at 5 ¶ 32.) In response to these allegations, Crawford admits that Petitioner is currently detained at the Farmville Detention Center, but Crawford denies that he is responsible for deciding whether Petitioner should be detained in the first instance. Respondents Pamela Bondi, Kristi Noem, Todd M. Lyons, and/or James A. Mullan (“Government Respondents”) have the authority to make that decision.

4. Crawford is a nominal defendant only. While not conceding that he is an indispensable party to *habeas corpus* petitions such as this, Crawford understands that is why he is a named respondent in this case. Crawford will abide by any directive, final order or judgment (pending appeal of the United States government if execution of such final order or judgment is stayed pending appeal) entered by this Court directing him to take action with respect to Petitioner

5. Crawford has no knowledge of any other allegations, arguments, or legal conclusions contained in the Petition aside from the fact that Petitioner is currently detained at the Farmville Detention Center, as stated in Paragraph 18 of the Amended Petition, *supra*.

6. As a nominal respondent, neither Crawford nor his employer, Abyon, takes any position with respect to the merits of the Amended Petition or the basis for the relief Petitioner seeks.

7. To the extent that Crawford is required to take a position with respect to the merits of the Amended Petition, Crawford joins in, adopts, and incorporates by reference any response filed by Government Respondents, as he is permitted to do under Fed. R. Civ. P. 10(c).

WHEREFORE, as a nominal respondent, Jeffrey Crawford respectfully prays that he be relieved from any further obligation to respond to any pleadings or motions filed in this case.

Dated: May 19, 2025

Respectfully Submitted,

JEFFREY CRAWFORD

/s/ John M Erbach

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