

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

ARTHUR VICTOR NEWMARK,)	
)	
Petitioner,)	
)	
v)	Civil Action No 1:25-cv-929
)	
JEFFREY CRAWFORD, et al.)	
)	
Respondents.)	

**NOMINAL RESPONDENT JEFFREY CRAWFORD’S
RESPONSE TO THE COURT’S ORDER FOR SHOW CAUSE**

COMES NOW Jeffrey Crawford (“Crawford”), a nominal respondent named in this case, by counsel, and responds to the Court’s Order entered June 3, 2025 (ECF No. 3), directing Respondents to, on or before 3:00 p.m. on Friday, June 6, 2025, show cause why Petitioner’s Verified Petition for a Writ of Habeas Corpus (ECF No. 1) should not be granted. In response to the Court’s Order, Crawford represents the following to the Court:

1. Crawford is correctly identified in the Petition as the Director of the Farmville Detention Center, which is owned and operated by Abyon, LLC (“Abyon”). (Pet. at 5 ¶ 18.)
2. 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. 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.

4. Crawford admits that Petitioner is currently detained at the Farmville Detention Center.

5. The Petition contains no material allegations pertaining to Abyon or Crawford

6. 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 4, *supra*.

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

8. To the extent that Crawford is required to take a position with respect to the merits of the Petition, Crawford joins in, adopts, and incorporates by reference any forthcoming response filed by Respondents Russell Hott, Todd Lyons, Erik Siebert, and/or Kristi Noem, 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: June 6, 2025

Respectfully Submitted,

JEFFREY CRAWFORD

/s/ Kasey L. Hoare
Kasey L. Hoare (Va Bar No. 92289)
khoare@spottsfain.com
Spotts Fain, P.C.
411 E. Franklin Street, Suite 600
Richmond, VA 23219
(804) 697-2044
(804) 697-2144 Fax
Counsel for Respondent Jeffrey Crawford