

I, Mohamed Lamine Kouyate, have been representing myself in this Habeas Corpus petition pro se, even though I do have legal representation.

My first point of emphasis in this matter, is that Respondent states that even though I have been detained six months over my removal period (Nov 27, 2024 - May 26, 2025), it is fine because I have failed to comply with removal efforts.

That is not the case. I have complied in every way possible for ICE to do the necessary to have me removed in due time, but it was never done. I gave all the necessary information to get me out on time. They state that if I had complied, I would have been removed since November 27, 2023, but that is a false statement simply because I had a right to an appeal after the BIA had dismissed my case. After lodging in my appeal, ICE/ERO tried to put me on a commercial flight but I had a stay of removal pending and law clearly states once a stay of removal is pending it is considered valid until a Judge from the Court of Appeals denies the motion. In my case, on November 25, 2023, once I got to the Atlanta field office, the officer in charge of me received an email from my attorney proving to him that I indeed did have

a valid stay of removal, and that the attempt to remove at this time was not legal. As a result to that, I was sent back to Stewart Detention Center in Lumpkin GA, only to be transferred a week later to Dallas, in order to be put on this time, an ICE flight. So clearly ICE/ERO did not respect my stay of removal which was pending. Once in Dallas, the stay of removal had become official, as the judge had granted the motion. Once again I was sent back to Stewart Detention Center.

For that matter, it is safe to say that I did not fail to comply to my removal and that I was still legally fighting my case despite the attempts to remove me before the judge could officially grant my stay. In conclusion, I was not the cause of my own detention.

My next point of argument is that in the Respondent's brief, they state that a travel document received is valid until January 30th, 2026. What they fail to mention is that my office stated he had a travel document issued from April 15, 2025 to October 15, 2025, which means as we speak that travel document is presently valid. On or about June 9th I was told by my ICE officer (J. Knowles) that a flight was booked for the 27 of June and a

supervisor, (Stephens) at Stewart detention Center had also informed me that two agents were to accompany me to Guinea and that ICE/ERO was waiting for them to get clearance in order to fly with me, and that if they didn't get the necessary clearance I wouldn't be able to go just yet. I am assuming the agents never got clearance to enter Guinea. On June 18th I was now moved to Arizona, Florence detention, where I was newly told that I wasn't going commercial but chartered. Again I assume no clearance was given to enter Guinea, but you have my travel document. It is hard to believe that my country government issues a travel document but does not give clearance.

On June 27, 2025 I was not put on a commercial flight, but on July 2, 2025 I was sent to the airport in Arizona with multiple africans going to different parts of Africa, including four other individuals from Guinea. When it was time to board the flight me and the other four were put aside and were told that our country is not giving clearance to land in Guinea, yet the Respondent state they obtained our travel documents legally. That is now hard to believe. None the less ICE/ERO agents told us that they would try again. They did just that on the 7th of July, and were still unable to deport us again, so we were all sent back to our detention

centers. Again, I was sent back to Stewart Detention Center. I was recently sent back to Atlanta office for a flight on August 22, 2025. Once in Atlanta, the officer informs me that I have a flight heading to Ethiopia but that is not my country and I can never go to a place I don't speak the language or have family to reach out to. I was also assured if going commercial I would be with ICE/ERO agents so they could hand me to the authority in my country with the right paperwork. They had no one to escort me, and as I mentioned before how can two travel documents be issued to a single person. The first travel document is valid from April 15th to October 15th 2025. So how can another travel document be issued from July 30th to January 30th 2026? A new travel document can only be issued if a previous has expired, that is why I stated that these documents are fraudulent because Guinea is still under military junta. My attorney has also looked into this matter and my embassy stated that no document was issued to my name by them because they are not in measure to do so with the current situation in Guinea, hence why no clearance. I cannot show you the previous document because my officer (Knowles) would not let me get a copy telling me he only had a copy and not the original.

Yet he gave me the document number (1292) and the new travel document issued carries the same document number. If a travel document is renewed or reissued it can never carry the same number. In this matter, ICE/ERO is only attempting to remove however they can because they know that my detention has been illegal for a while. So as long as I leave it doesn't make a difference what issues I encounter in other countries with these false documents, because I am removed from US territory, but the procedure is not legal. I was ordered removed to Guinea or not Ethiopia. In conclusion, there is no way I can have two valid travel documents at the same time. It is only forged to keep me in detention as long as possible, knowing that I can't be removed the legal way due to my country status or they would have gotten clearance for the ICE/ERO agents or for ICE/ERO planes to land and both were refused. ICE had six months to remove me after my final order (Nov 27, 2024 - May 26, 2025) but didn't make any arrangements until later in July on the 2nd to be exact. I have shown that I agreed to leave, just was never able to. It has now been three months over the six months period. My embassy is as well willing to give my attorney a written statement if need be.

In my next point the Respondent states that I was given a 180 day post-order custody review on July 29th, yet my officer (Knowles) has not shown up to speak to me since I have been back to Stewart Detention. I spoke to a different officer who informed me himself that my travel document was still valid and that I would be removed soon before expiration, yet a new travel document was issued the next day.

Respondent mentions that Guinea is open for international and that ICE/ERO has been removing people but they fail to mention that the people removed are all passport holders, hence why I mostly have put on chartered flights.

Respondents uses my criminal history to justify my detention but legally that has no effect or should have no effect at this point because the time frame is way past the legal given time. I can also show that all my charges have been dropped but I am in detention and my criminal lawyers can mail all that the court needs for proof as well as from my embassy, that they never issued two travel documents that are both valid at the same time.

In conclusion, I ask this court and Judge Amelia G. Helmick to verify all given information and to give me additional time to send all the proof that my cases are closed and that my government never issued out two travel documents. I also never failed to comply, when I was under legal right to remain in the country since my stay was final. In fact I only submitted a habeas request only a month after the six months deadline. As we speak today on the 09/04/202 I am being relocated again in attempt to hinder me from replying the Respondent's brief. This is really what has been going on for the past four months. I have all necessary documentation, just not on my person as I have been detained and my lawyers are sometimes busy in court I need extra time to reach out and have them directly and immediately send you all the necessary proof.

Pursuant to Title 28, U.S. Code Section 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, this day of September, 4, 2025.

Mohamed Kouyate

A#

