

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

FRICO JEAN (A [REDACTED]),

)

Case No. 6:25-cv-00970-JDC-DJA

VERSUS

)

Judge James D. Cain, Jr.

BRYAN PATTERSON, et al

)

Magistrate Judge Ayo

**RESPONDENT'S EMERGENCY MOTION TO HOLD ICE IN CONTEMPT OF COURT**

A. Petitioner FRICO JEAN, by and through his attorneys of record files this Motion for Contempt of Court and Sanctions against Immigration & Customs Enforcement ("ICE").

C. This Honorable Court issued a temporary restraining order on July 16, 2025, restraining ICE from removing Petitioner FRICO JEAN from the state of Louisiana. (Dkt.11)

D. On August 12, 2025, Petitioner FRICO JEAN called his family to inform them that ICE was preparing to deport him. Petitioner's family reached out to counsel. Counsel contacted the Assistant U.S. Attorney who in turn reached out to various parties at ICE. ICE confirmed that they were not taking action to deport Petitioner.

On August 13, 2025, Petitioner FRICO JEAN called his family again. He is now in Haiti. He emailed photos of himself in Haiti. Petitioner FRICO JEAN was deported to Haiti despite this Court's order and contrary to ICE's representations to counsel. In fact, ICE's Detainee Locator stated that Petitioner FRICO JEAN continued to be detained in Louisiana until late August 13, 2025.

This is the second time ICE violated this court's Order of July 15, 2025. ICE previously transferred Petitioner to Kentucky and then Indiana. ICE returned him to Louisiana upon interference of the Assistant U.S. Attorney.

Respectfully Submitted,  
Petitioner Frico Jean

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By: /s/ Elizabeth M. Carmody

ICE is well aware of this Court's Order and continues to violate it. ICE is also actively misrepresenting its actions.

The Supreme Court has long recognized the contempt power of the federal courts as "essential to . . . the enforcement of the judgments, orders, and writs of the courts," and thus inherent in courts' authority. *Ex Parte Robinson*, 86 U.S. 505 (1873). It is appropriate for this Court to exercise its authority to ensure ICE's compliance with its orders, both now and in the future.

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

- A. Hold Immigration & Customs Enforcement in Contempt of Court;
- B. Order Petitioner Frico Jean's immediate return to Louisiana;
- C. Order Petitioner Frico Jean's release from ICE custody, as the agency has repeatedly demonstrated that it cannot be trusted to follow the orders of this Honorable Court;
- D. Order sanctions against Immigration & Customs Enforcement; and
- E. Order such other relief as is equitable and just.

Dated: August 13, 2025

Respectfully Submitted,  
Petitioner Frico Jean  
By: /s/ Erin C. Cobb  
Erin C. Cobb  
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ATTORNEYS FOR FRICO JEAN

/s/ Erin C. Cobb

Erin C. Cobb

Knechtman Burton & Associates, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on August 14, 2025, I electronically filed the foregoing with the clerk of court by using the CM/ECF system, which will send a notice of electronic filing to counsel for Respondents, as counsel for Respondents is an electronic filer with the court. I also provided a courtesy copy of this motion to counsel for Respondents prior to filing it with the CM/ECF system.

/s/ Erin C. Cobb  
Erin C. Cobb  
Kriezelman Burton & Associates, LLC