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***Pro se* Memorandum of Facts and Law**

# UNITED STATES DISTRICT COURT

**For the**
**Southern District of Florida**
**400 North Miami avenue, Miami Florida, 33128-7716**

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**In Matter Of:**
**MBUTHA ELVIS MULI**
[redacted]
***Pro se petitioner***

**Vs.**

**CASE No. 1:25-cv-23593-EA**

**Immigration Customs and Enforcement**
***Respondent***

## MEMORANDUM OF FACTS AND LAW

**COMES NOW,** Mbutha Elvis Muli who files this memorandum of facts and law to show cause, why his petition should be granted, and states as follows;

## 1. INTRODUCTION

A detainer is not a warrant of any kind.

Pursuant to 8 C.F.R. 287.7, a detainer is a form by which the U.S. Department of Homeland Security (DHS) requests, in relevant part, that a federal, state, or local law enforcement agency temporarily detain an alien in that agency's custody for a period not to exceed 48 hours, excluding Saturdays, Sundays, and holidays in order to permit assumption of custody by DHS. 287.7(d)

8 U.S.C.S. 1357(d) authorizes the issuance of detainers to federal, state, or local law enforcement agencies for individuals suspected of being aliens and who are arrested for violating any law relating to a controlled substance offense.

1. 8 C.F.R. 287.7 did not compel state or local law enforcement agencies (LEAs) to detain suspected aliens subject to removal pending release to immigration officials, but rather, 287.7 merely authorized the issuance of detainers as requests to local LEAs, and thus, the county was free to disregard the Immigration and Customs Enforcement detainer and could not use as a defense that its own policy did not cause the deprivation of the alien's constitutional rights;

2. Reading 287.7 to mean that a federal detainer filed with a state or local law enforcement agency was a command to detain an individual on behalf of the federal government would violate the anti-commandeering doctrine of the Tenth Amendment. ***(See Galarza v. Szalczyk, 745 F.3d 634 (3d Cir. 2014) )***

**NOTE:**

The words "shall maintain custody," in the context of 8 C.F.R. 287.7 as a whole, appear next to the use of the word "request" throughout the regulation. Given that the title of 287.7(d) is "Temporary detention at Department request" and that 287.7(a) generally defines a detainer as a request, it is hard to read the use of the word "shall" in the timing section to change the nature of the entire regulation.

All courts of appeals to have commented on the character of Immigration and Customs Enforcement detainers refer to them as requests or as part of an informal procedure. All federal agencies and departments having an interest in Immigration and Customs Enforcement detainers have consistently described such detainers as 'requests'.

Immigration and Customs Enforcement (and its precursor Immigration and Naturalization Service) have consistently construed detainers as requests rather than mandatory orders. The position of federal immigration agencies has remained constant: detainers are not mandatory.

No U.S. Court of Appeals has ever described Immigration and Customs Enforcement detainers as anything but 'requests' and no provisions of the Immigration and Nationality Act, 8 U.S.C.S. 1101 et seq., authorize federal officials to command local or state officials to detain suspected aliens subject to removal.

Congress's only specific mention of detainers appears in 287 of the Immigration and Nationality Act, 8 U.S.C.S. 1357(d). The Act ***does not authorize*** federal officials to command state or local officials to detain suspected aliens subject to removal. Moreover, 1357(d) is a request for notice of a prisoner's release, not a command (or even a request) to law enforcement agencies to detain suspects on behalf of the federal government.

Under the Tenth Amendment, immigration officials may not order state and local officials to imprison suspected aliens subject to removal at the request of the federal government. Essentially, the federal government cannot command the government agencies of the states to imprison persons of interest to federal officials.

All powers not explicitly conferred to the federal government are reserved to the states, a maxim reflected in the text of the Tenth Amendment. It follows that any law that commandeers the legislative processes and agencies of the States by directly compelling them to enact and enforce a federal regulatory program is beyond the inherent limitations on federal power within our dual system. In other words, a conclusion that a detainer issued by a federal agency is an order that state and local agencies are compelled to follow, is inconsistent with the anti-commandeering principle of the Tenth Amendment.

Reading 8 C.F.R. 287.7 to mean that a federal detainer filed with a state or local law enforcement agency is a command to detain an individual on behalf of the federal government would violate the anti-commandeering doctrine of the Tenth Amendment. Immigration officials may not compel state and local agencies to expend funds and resources to effectuate a federal regulatory scheme.

8 C.F.R. 287.7 does not compel state or local law enforcement agencies to detain suspected aliens subject to removal pending release to immigration officials. Section 287.7 merely authorizes the issuance of detainers as requests to local law enforcement agencies. Given this, a county is free to disregard an Immigration and Customs Enforcement detainer, and it therefore cannot use as a defense that its own policy did not cause the deprivation of an alien's constitutional rights.

## 2. BACKGROUND

Mbutha Elvis Muli is not a citizen or national of the United States. Mbutha Elvis Muli is a native of KENYA and a citizen of KENYA;

Mbutha Elvis Muli was admitted to the United States at Washington, DC on or about February 15, 2010 as an immigrant Lawful Permanent Resident, Visa class DV1 (Diversity Immigrant);

Mbutha Elvis Muli was on May 8th, 2019 convicted in the Circuit Court of the Ninth Judicial Circuit, in and For Orange County, Florida for the offense of Tampering With a Witness to Hinder Communication to a Law Enforcement Officer in violation of Florida .

On the basis of the foregoing Mbutha Elvis Muli was subjected to removal from United States pursuant to the following provisions of law:

Section 237 (a) (2) (A) (iii) of the Immigration and Nationality Act (Act), as amended in that at any time after admission, you have been convicted of an aggravated felony as defined in section 101 (a) (43) (S) of the Act, a law relating to obstruction of justice, perjury or subornation of perjury, or bribery of a witness, for which the term of imprisonment is at least one year.

Mbutha Elvis Muli, on or about the February 24th, 2025 was arrested for a simple trespass. On February 25th, 2025 Mbutha Elvis Muli was sentenced to Time Served. Instead of being released, the Orange County Corrections Department held him following a detainer that was lodged against him by the Department of Homeland Security's (DHS) agency Immigration Customs and Enforcement (ICE).

Mbutha Elvis Muli, at no point did he ever personally receive any formal paperwork to affirm a detainer by the Immigration Customs and Enforcement (ICE).

After more than 48 Hours in the Orange County Corrections Department, on or about February 28th, 2025, Mbutha Elvis Muli was released to Immigration Customs and Enforcement (ICE) who assumed his custody.

Since March, 3rd, 2025 Mbutha has remained in the custody of Immigration Customs and Enforcement (ICE), at the Krome Miami North SPC Detention Center in Miami Florida

## 3. APPLICABLE LAW

Arrest and detention are a deprivation of freedom. When an individual in a state or local correctional facility continues to be held against his or her will despite having served a sentence, its important, if not vital, if the United States rule of law id to mean anything, that a court determine whether continued detention is lawful.

### a. The Fourth Amendment Right:

The Fourth Amendment Right of the United States Constitution protects against{2025 U.S. Dist. LEXIS 28} unreasonable searches and seizures:

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized. U.S. Const. amend. IV.

"The Fourth Amendment prohibits unreasonable seizures; it is not a general prohibition of all conduct that may be deemed unreasonable, unjustified or outrageous." *Medeiros v. O'Connell*, 150 F.3d 164, 167 (2d Cir. 1998). The "first step in any Fourth Amendment

claim (or, as in this case, any section 1983 claim predicated on the Fourth Amendment) is to determine whether there has been a constitutionally cognizable seizure." *Id.*

Once it has been determined that a seizure occurred, a court must then determine whether that seizure was reasonable. *Caldarola v. Cnty. of Westchester*, 343 F.3d 570, 574 (2d Cir. 2003). "Generally, a seizure amounting to an arrest 'is not reasonable unless it is accomplished pursuant to a judicial warrant issued upon probable cause.'" *Jones v. Cnty. of Suffolk*, 936 F.3d 108, 114 (2d Cir. 2019) (quoting *Skinner v. Ry. Labor Execs.' Ass'n*, 489 U.S. 602, 619, 109 S. Ct. 1402, 103 L. Ed. 2d 639, (1989).

**b. Fourteenth Amendment Right**:

The constitutional guarantees of procedural and substantive due process are found in the Fourteenth Amendment of the United States Constitution. U.S. Const. amend. XIV. "Procedural due process imposes constraints on governmental decisions which deprive individuals of 'liberty' or 'property' interests within{2025 U.S. Dist. LEXIS 29} the meaning of the Due Process Clause of the Fifth or Fourteenth Amendment." *Mathews v. Eldridge*, 424 U.S. 319, 332, 96 S. Ct. 893, 47 L. Ed. 2d 18 (1976). "Freedom from imprisonment-from government custody, detention, or other forms of physical restraint-lies at the heart of the liberty that Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S. Ct. 2491, 150 L. Ed. 2d 653 (2001).

As to substantive due process, "[w]hen a right is 'fundamental,' governmental regulation must be narrowly tailored to serve a compelling state interest. Rights are fundamental in the substantive due process framework when they are implicit in the concept of ordered liberty, or deeply rooted in this Nation's history and tradition." *Molinari v. Bloomberg*, 596 F. Supp. 2d 546, 567 (E.D.N.Y.) (Sifton, J.), *aff'd*, 564 F.3d 587 (2d Cir. 2009).

## 4. PROBABLE CAUSE

The Florida state's law and federal law mirror each other regarding what constitutes arrest. A showing of official authority such that a reasonable person would have believed he was not free to leave indicates that an arrest has occurred under the fourth amendment of the United States constitution. A suspect is in custody when a reasonable person innocent of any crime would not have believed he or she was free to leave the presence of the law enforcement. With respect to immigration detainers, the federal courts have held that a continued detention on the basis after the inmate is entitled to release constitutes a new arrest.

Under the fourth amendment a person cannot be taken or held in custody without probable cause. As he Supreme Court held in *Arizona vs. United States*, "detaining individuals solely to verify their immigration status would raise *serious* (Emphasis added) constitutional concerns. After *Arizona,* Several courts found local law enforcement entities liable for fourth amendment violations when a non citizen was held on an immigration detainer that provided no probable cause for detention.

*In C.F.C v Miami Dade Cnty., 349 F supp. 3d 1236*, The Plaintiffs alleged plausible facts that the county violated their fourth amendment right when it arrested them based on their ICE detainer and without probable cause that either of them had committed a crime. They plausibly alleged that the county violated their Fourth Amendment Right as it was not authorized by the Federal Law to arrest them for civil immigration violation and therefore they were arrested without probable cause of a crime and the county lacked authority under color of state law to arrest them for civil immigration and that Fla. Stat § 901.08 wan not relevant to analysis of plaintiffs claims.

**5. <u>STATE-FEDERAL COOPERATION</u>**

The full extent of federal permission for state-federal cooperation in immigration enforcement, does not embraces detention of a person based solely on either a removal order or an ICE detainer. Such extension exceeds the limited circumstances in which state officers may enforce federal immigration law and thus violates the system congress created. Seizure solely conducted on the basis of known suspected civil immigration violates the Fourth Amendment when conducted under color of state law.

Even in cases where ICE supplies a probable cause to believe a non citizen is deportable for civil immigration violation, such probable cause, without more does not justify the seizure of a person under color of state law. In general, civil matters do not justify arrests or custodial seizures amounting to arrest. In the case of seizures for civil for civil immigration viola the state has no legitimate interest in effecting the seizure itself.

*In the matters of Galarza*, the court held that requiring state and local jurisdiction to comply with immigration detainers would violate the Tenth Amendment Anti-commandeering principle.

The issuance of an immigration detainer results to continued and often prolonged detention by state and local officials an act for which the congress has provided n express statutory authority except for controlled substances.

The seizure of individuals for known or suspected immigration violation can violate the fourth amendment when conducted under the color of state law because it's not ac crime for a person to remain in the United States. Only when acting under color of federal authority- that is as directed, supervised, trained, certified and authorized by the federal

government, may state officers effect constitutionally a reasonable seizure for civil immigration. Violation does not constitute a reasonable suspicion or probable cause of a criminal infraction, and therefore cannot justify a Fourth Amendment seizure.

**6. <u>People ex rel. Wells v Demarco</u>**

On November 14, 2018, during the pendency of this litigation, the Second Department issued a decision in *People ex rel. Wells v. DeMarco*, in which they considered the issue of "whether New York law permits New York state and local law enforcement officers to effectuate civil immigration arrests." 168 A.D.3d 31, 34, 88 N.Y.S.3d 518 (N.Y. App. Div. 2d Dep't 2018).

The *Wells* case centers on Susai Francis, a citizen of India who entered the United States on a work visa in 1996 which allowed him to remain in the country for six months. *Id.* Francis did not leave the United States after the term of his visa expired, but rather stayed in Long Island for over two decades with his family. *Id.* On June 14, 2017, Francis was arrested on two misdemeanor counts and was held in Nassau County Correctional Center. *Id.* Upon his arrest by local law enforcement, ICE provided a detainer and arrest warrant to the Nassau County Policy Department, requesting "the Police Department notify ICE as soon as practicable before{2025 U.S. Dist. LEXIS 16} Francis was released from custody, on at least 48 hours' notice, if possible." *Id.* at 35. On December 4, 2017, after being transferred to the custody of Suffolk County for proceedings in his case, Francis pled guilty to one count of disorderly conduct in Suffolk County District Court and was sentenced to time served. *Id.* However, Francis was not released and was instead remanded from the Nassau County Correctional Center to the Suffolk County Correctional Facility in Riverhead (the "Riverhead facility"). *Id.* Francis's paperwork was "'re-written' from being an 'adult male misdemeanor' case to be being an 'adult male warrant' case based on the ICE warrant, and Francis was regarded by the Sheriff as being in the custody of ICE. Francis was placed in a jail cell rented by ICE." *Id.* at 36. This action, the *Wells* court found, was consistent with policy issued by the SCSO on December 2, 2016, "under which inmates subject to either an ICE detainer accompanied by a United States Department of Homeland Security (hereinafter DHS) Warrant for Arrest of Alien, and/or DHS Warrant of Removal/Deportation, are to be held for up to 48 hours after the time they would otherwise have been released, with{2025 U.S. Dist. LEXIS 17} ICE to be notified immediately." *Id.* at 35.

While Francis was at the Riverhead facility, Jordan Wells, an attorney with the New York Civil Liberties Union Foundation, filed a habeas petition on Francis's behalf, challenging the constitutionality of Francis's confinement and detention pursuant to the ICE warrant and detainer. *Id.* at 36.

Two days after being remanded to the Riverhead facility, ICE agents retrieved Francis and transferred him to a long-term ICE detention facility. *Id.* As of January 5,

2018, Francis was in ICE custody at the Bergen County Jail in Hackensack, New Jersey, pending removal proceedings in Immigration Court. *Id.*

The *Wells* court focused primarily on the question of whether detention pursuant to an ICE detainer and warrant constitutes an arrest, and, if so, whether New York State law enforcement officials have authority to make such arrests. *Id.* at 39-40. The *Wells* court first discussed the issue of the arrest:

New York state and federal law mirror each other regarding what constitutes an arrest (*see Florida v Royer*, 460 US 491, 502, 103 S. Ct. 1319, 75 L. Ed. 2d 229 [1983] [a showing of official authority such that "a reasonable person would have believed that he was not free to leave" indicates that an arrest has occurred under the Fourth Amendment of the United State Constitution (internal quotation{2025 U.S. Dist. LEXIS 18} marks omitted)]; *People v Yukl*, 25 NY2d 585, 589, 256 N.E.2d 172, 307 N.Y.S.2d 857 [1969] [a suspect is in custody when a reasonable person innocent of any crime would not have believed he or she was free to leave the presence of the police]). With respect to immigration detainers, the federal courts have held that a continued detention on that basis after an inmate is entitled to release constitutes a new arrest (*see Morales v Chadbourne*, 793 F.3d 208, 217 [1st Cir 2015] [since an individual was "kept in custody for a new purpose after she was entitled to release, she was subjected to a new seizure for Fourth Amendment purposes-one that must be supported by a new probable cause justification"]; *Moreno v Napolitano*, 213 F Supp 3d 999, 1005 [ND Ill 2016] [federal government conceded that detention of an individual pursuant to an ICE detainer constitutes an arrest]).*Id.* Because Francis was entitled to release after being sentenced to time served on his state charges but was nonetheless held following that date pursuant to an ICE warrant and detainer, the *Wells* court found "he was subjected to a new arrest and seizure under both New York law and the Fourth Amendment of the United States Constitution." *Id.* at 40.

Having determined that there was a subsequent arrest pursuant to the ICE detainer, and after noting that the arrest warrant pursuant to which Francis was held was civil, as opposed to criminal, in nature, the Court then turned{2025 U.S. Dist. LEXIS 19} to the question of whether local law enforcement had authority to effectuate those arrests. *Id.* at 40-41.

The court first looked to New York Statutory Law for authority for these arrests but found the civil warrants at issue did not fall under one of the "three types of warrants" recognized for bringing a defendant before a court. *Id.* at 42 (citing CPL 120.10; CPL 210.10; CPL 530.70). While the court recognized there are some additional situations in which a local law enforcement officer can make an arrest, all of those situations involve a judicial or quasi-judicial determination. *Id.* Further, the *Wells* court found these officers, while empowered to make warrantless arrests in some circumstances, are not authorized to effectuate warrantless arrests for civil violations. *Id.* at 43. Therefore, the *Wells* court concluded the officers had no authority under New York Statutory law to effectuate these arrests. *Id.* at 44.

The court also rejected the SCSO and DOJ's argument that "even if New York state and local law enforcement officers are not statutorily authorized to execute federal immigration arrest warrants, such arrests are nevertheless permissible under the broad state police powers recognized at common law, there being no New York{2025 U.S. Dist. LEXIS 20} statute that prohibits such arrests." *Id.* The court found that, "while it may be acknowledged that New York possesses broad reserved police powers, it does not follow that the existence of such powers supports civil immigration arrests by state and local law enforcement." *Id.* at 45.

The *Wells* court also declined to find that the fellow officer rule provided authority for these arrests. *Id.* at 47. The fellow officer rule allows a local law enforcement officer to "make a lawful arrest even without personal knowledge sufficient to establish probable cause, so long as the officer is acting upon the direction of an officer in possession of information sufficient to constitute probable cause for the arrest." *Id.* (quoting *People v Ketcham*, 93 NY2d 416, 419, 712 N.E.2d 1238, 690 N.Y.S.2d 874 (1999) (internal quotation marks omitted). The *Wells* court explained: "even if it is assumed that an ICE officer has probable cause to arrest for an immigration violation, the fellow officer, in this case the Sheriff's officers, must still make a 'lawful' arrest. If there is no authority to arrest for a civil matter, such arrest cannot be considered 'lawful.' To adopt the position advocated by the Sheriff here would permit state and local law enforcement to assume the authority of an ICE{2025 U.S. Dist. LEXIS 21} officer, though not granted by state law, based upon nothing more than a request from ICE." *Id.*

Finally, the *Wells* court turned to the question of whether state and local law enforcement officers are authorized by federal law to make civil immigration arrest. *Id.* "Assuming, without deciding," the *Wells* court wrote, "that the Congress may constitutionally convey authority to state and local officials to effectuate arrests which state law does not authorize, we conclude that the Congress has not done so with regard to the circumstances presented by this case." *Id.* at 48.

In reaching this conclusion, the court first looked to Rule 4 of the Federal Rules of Criminal Procedure, which governs the execution of federal arrest warrants. *Id.* The court found "[w]hile there is no question that New York law enforcement officers may execute federal court arrest warrants issued for the purpose of bringing to court individuals accused of the commission of federal immigration crimes, the ICE warrant at issue here was not issued in the context of a criminal action and was not signed by, or on behalf of, a court and was not returnable in a court. Thus, the Federal Rules of Criminal Procedure do not empower New York state and local law enforcement officers to{2025 U.S. Dist. LEXIS 22} execute ICE administrative arrest warrants." *Id.*

The court then turned to the question of whether the SCSO was authorized under the INA to make these arrests. The court found the SCSO "does not have a 287 (g) agreement with DHS. Rather, the Sheriff has long had an agreement with the United States Marshals Service pursuant to which federal detainees may be housed at the Riverhead facility." *Id.*

After determining that there was no formal agreement pursuant to Section 287(g), the *Wells* court then addressed whether this conduct was authorized under subsection 287(g)(10), which allows "'any officer or employee of a State or political subdivision of a State' [to] 'cooperate with the [Secretary] in the identification, apprehension, detention, or removal of aliens not lawfully present in the United States' without any formal agreement." *Id.* at 50 (quoting 8 USC 1357(g)(10)(B)). The *Wells* court found there was no informal agreement justifying these arrests:

In those instances where the Congress has chosen to permit local officers to enforce federal immigration laws absent a formal 287 (g) agreement, it has explicitly allowed that power only in narrowly drawn circumstances. Given that Tenth Amendment concerns may prevent the Congress from mandating that local entities enforce{2025 U.S. Dist. LEXIS 23} immigration law (*see City of El Cenizo, Texas v Texas*, 890 F.3d at 180-181), and the resulting circumspection with which the Congress has approached the issue of state and local involvement in matters of federal immigration policy, we cannot accede to the view that the Congress, through its provision for voluntary informal cooperation, thereby authorized state and local law enforcement officers to undertake actions not allowed them by state law.*Id.* at 52.

In conclusion, the court explained the "narrow issue in this case is whether New York law permits New York state and local law enforcement officers to effectuate civil immigration arrests, and not whether federal civil immigration officers have the authority to effectuate such arrests." *Id.* at 53. The Court maintained it was not "decid[ing] any issues under federal law deputizing state and local law enforcement officers to act as federal immigration officers." *Id.* "Determining only the narrow issue before us, we conclude that the Sheriff's policy, issued on December 2, 2016, directing the retention of prisoners, who would otherwise be released, pursuant to ICE detainers and administrative warrants is unlawful, and that **Francis's detention by the Sheriff** on December 11, 2017, which detention commenced {2025 U.S. Dist. LEXIS 24} **after the termination of Francis's court proceeding that day, was thus unlawful**." *Id.*

Notably, the *Wells* court said it did not reach the question of whether there was a Fourth Amendment violation: "In view of our determination on a narrow issue of New York law, we need not consider the petitioner's contention that Francis's Fourth Amendment rights were violated." *Id.* at 54 n. 9.

## 7. THE FLORIDA STATE LAW

Fla. const. art. 1& 12 governing searches and seizures is analyzed constituent with the corresponding provisions of the U.S. constitution Amendment IV. Section 12, provides that this right shall be construed in conformity with the Fourth Amendment to the U.S. constitution as interpreted by the Supreme Court.

Fla. Const. art 1& 9 states that, no person shall be deprived of life liberty or property without due process of law. Courts appear to interpret that provision of the Florida constitution consistent with the Fifth Amendment to the U. S. constitution. The due process language used in the Fla. Constitution is virtually identical.

Fla. Statute §950.03 is not an independent source of authority under which local government can lawfully arrest an individual solely on the basis of a U.S. ICE detainer.

## 9. DELIBERATE INDEFERRENCE

Due to the issuance of a detainer without probable cause, the Orange County Corrections Department (OCCD) acting under color of state law was forced to adhere to its practice and policy without probable cause that Mbutha Elvis Muli had committed a criminal offense thus violating Mbutha Elvis Muli's Fourth Amendment Right of the United States constitution, which hence led to the unconstitutional false imprisonment and detainment, spending unwarranted time in the county jail whereas Mbutha Elvis Muli was supposed to be free.

## 8. FRUIT OF THE POISONOUS TREE DOCTRINE

The fruit of the poisonous tree doctrine applies only when the defendant has a standing regarding the Fourth Amendment Right violation which constitutes the poisonous tree. *(See United Sates V Salvucci, 448 US 83, 85, 100 s. ct. 254)*

## CONCLUSION

Mbutha Elvis Muli asserts that his Fourth Amendment and Fourteenth constitutional rights were violated when he was held without probable cause due to the issuance of a detainer by Immigration Customs and Enforcement (ICE). His freedom was curtailed by the issuance of a detainer by Immigration Customs and Enforcement (ICE). Mbutha Elvis Muli detention after the termination of his court proceedings was thus unlawful. In lieu of the foregoing Mbutha Elvis Muli's continues to suffer irreparable harm and his continued detention is unconstitutional.

## CERTIFICATE OF SERVICE

I Mbutha Elvis Muli certify that a true and correct copy have been sent via I.C.E Krome North SPC Detention Center Service Mail to the Assistant United States Attorney Michele S. Vigilance on October 31st, 2025. Court ID No. A5502091 99 N.E. 4th Street, Suite 400 Miami, FL 33132

Respectfully Submitted,

Signed: _____

Mr. Mbutha Elvis Muli

***Pro Se* Petitioner**

#[redacted]

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**TO: UNITED STATES DISTRICT COURT**
**SOUTHERN DISTRICT OF FLORIDA**
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