

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

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U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

DEC 01 2025

DANIEL J. MCCOY, CLERK

BY: _____



NIKO IASHVILI	}	CIVIL ACTION NO. 25-CV-01150
VERSUS		JUDGE DRELL
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT ET AL		MAGISTRATE JUDGE PERES-MONTES

ANSWER TO RESPONDENTS IN SUPPORT
OF PETITION FOR WRIT OF HABEAS CORPUS

My name is Niko Iashvili and I am a native and a citizen of Georgia. I am currently detained at the River Correctional Center in Ferriday, Louisiana. I respectfully submit this answer in response to the Government's filings. Immigration status and final relief granted on September 16, 2024. The immigration Judge granted me protection under the Convention Against Torture (CAT WITHHOLDING OF REMOVAL). The Department of Homeland Security (DHS) appealed that decision, but the Board of Immigration Appeals (BIA) dismissed the DHS appeal on January 29, 2025. Therefore, my removal order to Georgia has been finally overturned and I am legally protected from removal to Georgia. Despite this fully resolved immigration status, I have remained in ICE custody for more than 10 months, which constitutes prolonged detention that is no longer lawful or necessary.

I am a citizen of Georgia and possess a valid Georgian passport. My passport is valid until April 5, 2034. It is currently with ICE. A copy is attached to this response. Therefore, there is no issue regarding my identity or documentation. ICE already has everything required.

SECOND ANSWER

I am not a Flight Risk or Danger. I have no criminal history whatsoever - neither in my home country of Georgia nor in the United States. I have never been arrested for any offense other than immigration detention. I am not a danger to the community and the Government has presented no evidence suggesting otherwise. Additionally I have a sponsor, Manana Gogua-Trahi, my family friend and a U.S. citizen. She is willing to sponsor me and provide a stable residence, support and supervision. I am submitting her support letter, where her contact information is also included, as well as a copy of her U.S. passport. She is ready at any time to provide any additional information the Court may require regarding her commitment to support my release.

THIRD ANSWER

Evidence showing no significant likelihood of my removal in the reasonably foreseeable future, as required under *Zadvydas v. Davis*.

1. United Kingdom refused to accept me on February 21, 2025, the United Kingdom advised that they would not accept me.

2. Multiple countries have not responded to ICE request on or about May 30, 2025, ICE/ERO submitted requests to the governments of Armenia, Moldova and Azerbaijan for travel authorization. As the respondents themselves acknowledged, none of those countries responded. ICE resubmitted the same requests on July 2, 2025 and there are still no responses from any of those governments. This clearly demonstrates that removal is not realistically possible.

3. The passage of time after my final order. More than 10 months have passed since my final order (BIA decision on January 29, 2025). This is significant length of post-order detention is strong evidence that my removal is not reasonably foreseeable, consistent with *Zadvydas*.

CONCLUSION

The Respondents have failed to establish any significant likelihood that I will be removed in the reasonably foreseeable future. Because my removal is not possible at this time, my continued detention violates the Statute (8 U.S.C § 1231(a)(6)) and violates the constitutional protections recognized in *Zadvydas v. Davis*.

I am therefore entitled to immediate release under reasonable conditions of supervision. I am also submitting copies of the Immigration Judge's decision and the BIA's decision confirming my protection status.

Respectfully submitted,

November 26, 2025

Niko Iashvili

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