

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS

AHMAD ZAYED

Alien No.: 

Petitioner,

v.

TODD M. LYONS, Acting Director,  
Office of Detention & Removal,  
U.S. Immigration and Customs Enforcement;

MARY DE ANDA-YBARRA, El Paso Field Office  
Director, Office of Detention and Removal,  
U.S. Immigration and Customs Enforcement;

KRISTI NOEM, Secretary, Department of  
Homeland Security; and PAMELA BONDI,  
Attorney General,

Respondents.

Case#: 325 CV/00388/LS

Petitioner's Reply to Respondent's Answer

**PETITIONER'S RESPONSE TO RESPONDENT'S ANSWER TO PETITION FOR A WRIT OF HABEUS  
CORPUS**

COMES NOW, the Petitioner, AHMAD ZAYED, and respectfully submits this Reply to the Respondent's Answer, and in support thereof, states as follows:

**I. BACKGROUND**

Petitioner has been detained at the El Paso, Texas Detention Center for over one year. During this prolonged detention, Petitioner has endured unfair and inhumane treatment due to factors beyond their control—namely, Petitioner's **ethnicity, sexual orientation, and limited proficiency in the English language**. Petitioner came to the United States seeking refuge, safety, and the opportunity to live freely under the principles upon which this country was founded.

Instead, Petitioner has faced conditions that feel punitive and discriminatory. The continued detention has caused **severe emotional, mental, and physical distress**, which worsens with each passing day.

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## II. ARGUMENT

### 1. **Prolonged Detention Without Just Cause**

Petitioner's extended confinement—over one year—constitutes an **unlawful deprivation of liberty** inconsistent with the U.S. Constitution and the fundamental principles of justice. The Respondent's ongoing detention of Petitioner, despite the lack of flight risk or danger to the community, violates due process protections.

### 2. **Humanitarian Considerations and Available Relief**

Petitioner has a **brother residing in the State of Illinois** who is both willing and able to provide housing, care, and support. This presents a **viable and humane alternative to continued detention**, consistent with the Department of Homeland Security's authority to release detainees under supervision or on parole pending resolution of their case.

### 3. **Discriminatory and Coercive Treatment**

Petitioner has repeatedly experienced mistreatment and emotional coercion by detention staff, seemingly designed to pressure Petitioner into **signing removal papers** consenting to return to a country where Petitioner fears persecution. Such coercion is inconsistent with the standards of fair treatment and international obligations protecting asylum seekers and other vulnerable persons.

### 4. **Impact on Mental and Physical Health**

Petitioner's health has significantly deteriorated during detention. The conditions described amount to **psychological and physical torment**, which should not be tolerated in any facility within the United States, a nation that stands for freedom, justice, and human dignity.

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## III. REQUEST FOR RELIEF

Petitioner respectfully requests that this Honorable Court:

1. **Acknowledge the unlawful and prolonged nature of Petitioner's detention;**
  2. **Order Petitioner's immediate release** under appropriate supervision, parole, or bond;
  3. **Recognize the availability of a stable living arrangement** with Petitioner's brother in Illinois; and
  4. **Grant any other relief deemed just and proper** under the circumstances.
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## IV. CONCLUSION

Petitioner came to the United States seeking hope, safety, and freedom—the very essence of the American Dream. Instead, Petitioner has endured prolonged and unjustified confinement.

Petitioner implores this Court to recognize the profound toll this experience has taken and to **grant release in the spirit of justice, compassion, and human rights.**

Respectfully submitted,

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AHMAD ZAYED

Petitioner, Pro Se

El Paso Processing Center

El Paso, Texas

Date: 10/10/2025

**Mahmoud Zayed**



**10/15/2025**

**Honorable Judge Leon Schydlower / US District Court for the Western District of Texas**  
525 Magoffin Avenue, Suite 105  
El Paso, TX 79901

**RE: CASE# 325 CV/00388/LS**

**Dear Honorable Judge Leon Schydlower / US District Court for the Western District of Texas:**

I am reaching out to you on behalf of my brother, Ahmad Zayed (A ). I have included a copy of his "Petitioner's Reply to Respondent's Answer" for your reference. You will probably not receive the finalized signed document from my brother in a timely manner, this is why I am including it here for you. This is so that you are aware that he has this coming to you as soon as possible, what with the mailing restrictions within the El Paso Detention Center. It is critical that I forward this on his behalf to ensure that my brother has a fighting chance to fight his case in your honorable to court.

Thank you for your time and understanding,

A handwritten signature in black ink, appearing to read 'Mahmoud Zayed'.

**Mahmoud Zayed**