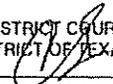


FILED

OCT 20 2025

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
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| <hr/> | |) |
| AHMAD ZAYED |) |) |
| Alien No.:  |) |) |
| |) |) |
| Petitioner, |) |) |
| |) |) |
| v. |) | Case#: <u>325 CV/00388/LS</u> |
| |) |) |
| TODD M. LYONS, Acting Director, |) | Petitioner's Reply to Respondent's Answer |
| 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. |) | |
| <hr/> | |) |

**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.

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.

III. REQUEST FOR RELIEF

Petitioner respectfully requests that this Honorable Court:

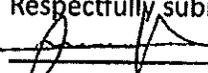
1. **Acknowledge the unlawful and prolonged nature of Petitioner's detention;**
2. **Order Petitioner's immediate release** under appropriate supervision, parole, or bond;
3. **Recognize the availability of a stable living arrangement** with Petitioner's brother in Illinois; and
4. **Grant any other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

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,


AHMAD ZAYED

Petitioner, Pro Se

El Paso Processing Center

El Paso, Texas

Date: 10/10/2025

10-16-2025

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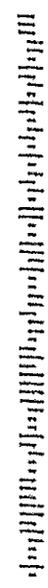
EL PASO, TEXAS 79901

NAME ZAYED - AHMAD RIBHI

A # [REDACTED] UNIT [REDACTED]

ICE PROCESSING CENTER

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