

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
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MAMADOU BOCOUM NDOYE,

Petitioner,

25 Civ. 8856 (VSB)

-against-


William JOYCE, in his official capacity as District Director of New York Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of Homeland Security; Pam BONDI, in her official capacity as Attorney General,

DECLARATION OF  
DEPORTATION OFFICER  
JONATHAN QUIZHPI

Respondents.  
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Pursuant to 28 U.S.C. § 1746, I, Jonathan Quizhpi, hereby declare under penalty of perjury that the following is true and correct:

1. I am a Deportation Officer at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I joined ICE on February 14, 2025, and have served in this capacity since July 2025. As a Deportation Officer, I manage the cases of aliens who are in immigration proceedings. Once an alien is ordered removed from the United States, I facilitate the alien’s removal by coordinating with the government of the alien’s country of removal to obtain proper travel documents.

2. I have prepared this declaration in connection with a Petition for a Writ of Habeas Corpus filed by Mamadou Boccoum Ndoeye (“Ndoeye”) on October 25, 2025. Ndoeye has been assigned the following Alien Number:  The following representations are based on my review of Ndoeye’s administrative file, consultation with my colleagues, and ICE electronic records and databases.

3. Petitioner is a native and citizen of Mali who entered the United States at an unknown location and on an unknown date, without being admitted or paroled.

4. On October 16, 2008, Ndoye was convicted in Pennsylvania state court of False Reports to Law Enforcement Authorities in violation of 18 Pa. Stat. § 4906 and Exceeding Maximum Speed Limits by 20 MPH in violation of 75 Pa. Stat. 3362; he was sentenced to time served.

5. On October 17, 2008, ICE personally served Ndoye with a Notice to Appear (“NTA”), charging him under INA section 212(a)(6)(A)(i), 8 U.S.C. § 1182(a)(6)(A)(i), as an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General. That NTA was subsequently served on the Executive Office for Immigration Review, Elizabeth Immigration Court in Elizabeth, New Jersey, thereby commencing removal proceedings against Ndoye.

6. On November 3, 2008, Ndoye was ordered removed from the United States to Mali by an Immigration Judge in York, Pennsylvania. Ndoye waived his right to appeal; therefore, his removal order became final.

7. On November 12, 2008, ICE submitted a request for a travel document from the Embassy of the Republic of Mali.

8. On November 13, 2008, ICE received notification from the Embassy of the Republic of Mali that Ndoye’s case would be investigated, and a travel document would be issued upon completion of their investigation and authorization from the Malian government.

9. On April 29, 2009, the Embassy of the Republic of Mali advised ICE that the request for a travel document was still pending.

10. On May 21, 2009, Ndoye was released from ICE custody on an Order of Supervision because ICE was unable to obtain travel documents from Mali for Ndoye's repatriation due to the country conditions in Mali at the time.

11. On May 28, 2009, Ndoye was convicted in New York state court of Trademark Counterfeiting in the Third Degree in violation of New York Penal Law § 165.71. Ndoye failed to comply with the court's orders and on December 9, 2009, a bench warrant was issued for his arrest.

12. On December 16, 2009, Ndoye was returned on bench a warrant and was sentenced to a conditional discharge and three days community service.

13. On December 21, 2009, upon completion of the criminal proceedings, Ndoye was taken into ICE custody, as he violated the terms of his Order of Supervision.

14. On December 21, 2009, Ndoye was again released on an Order of Supervision because ICE was unable to obtain travel document from Mali for Ndoye due to the country conditions in Mali at the time.

15. After release under his second Order of Supervision, Ndoye continued to have encounters with law enforcement.

16. On April 4, 2013, Ndoye was convicted in New York state court of Assault in the Third Degree in violation of New York Penal Law § 120.00 (1) and was sentenced to ten days imprisonment.

17. On April 5, 2017, Ndoye was convicted in Wyoming state court of Possession of a Controlled Substance – Marijuana in violation of Wyoming State Statute ("W.S.S.") 35-7-1031(c)(i)(A) and Speeding 86 mph in a posted 75 mph zone in violation of W.S.S. 31-5-301.

Ndoye was ordered to be remanded to the custody of the Sheriff of Carbon County for a period of forty-five days with credit for three days served.

18. On December 14, 2022, Ndoye was convicted in Oregon state court of Unauthorized Use of a Vehicle in violation of Oregon Revised Statutes § 164.135 and was sentenced to probation for a term of six months.

19. On October 21, 2025, officers from ICE Enforcement and Removal Operations (“ERO”) encountered Ndoye during a field operation on Canal Street, New York, New York and asked Ndoye for identification. Upon further investigation, Ndoye’s identity as a removable alien was confirmed and, thereafter, he was taken into ICE custody and transported to Elizabeth Contract Detention Facility for processing and to await transfer to a facility pending removal.

20. On October 22, 2025, Ndoye was transported to Orange County Jail (“OCJ”) in Goshen, New York, where he is currently being housed pending his removal pursuant to his final removal order. Pending removal, his detention is governed by INA section 241(a), 8 U.S.C. 1231(a). He has been detained since October 21, 2025.

21. On October 21, 2025, ICE served Ndoye with a Warrant of Removal and a Notice of Revocation of Release informing him that his Order of Supervision was revoked due to his arrests and convictions since being released under an Order of Supervision and he will be taken into ICE custody. On the same day, ICE interviewed Ndoye to obtain information to complete an application for travel documents for repatriation to Mali.

22. ICE is currently working to obtain travel documents from Mali to effectuate Ndoye’s removal.

23. Since January 2025, Mali has accepted citizens who were removed from the United States. Based on my experience, Mali will issue travel documents to its nationals who are in the United States.

24. ICE is unaware of any impediment to effectuating Ndoye's removal to Mali once it obtains travel documents.

I hereby declare under the penalty of perjury that the above statements are true and correct.

Executed at New York, New York  
This 7 day November of 2025.



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Jonathan Quizhpi  
Deportation Officer  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security