

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MAMADOU BOCOUM NDOYE

*Petitioner,*

V.

WILLIAM JOYCE, ET AL.,

*Respondents.*

Civil Action No. 25-cv-8856 (VSB)

SUPPLEMENTAL DECLARATION OF  
DEPORTATION OFFICER

MINCHEOL SO

Pursuant to 28 U.S.C. § 1746, I Mincheol So, 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 have served in this capacity since September 2015. 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 that alien’s country of removal to obtain proper travel documents.
2. This supplements the declaration submitted on November 7, 2025, in connection with the Petition for a Writ of Habeas Corpus filed by the Petitioner, Mamadou Bocoum Ndoye (“Ndoye”). I make this supplemental declaration in my official capacity based on my review of Ndoye’s administrative file, consultation with my colleagues, and ICE electronic records.
3. As stated in the declaration on November 7, 2025, ICE arrested Ndoye on October 21, 2025, during a field operation on Canal Street in New York, New York. The Petitioner

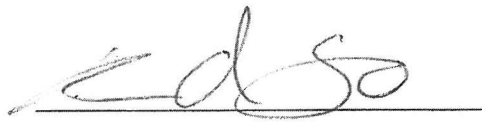
was not the target. When Ndoye was encountered by ICE, he was asked for identification. Upon identifying himself and providing his identification card, ICE officers were able to determine that Ndoye was the subject of an outstanding removal order issued on November 3, 2008.

4. On October 21, 2025, Ndoye was taken into custody and transported to Delaney Hall Detention Facility at 451 Doremus Avenue, Newark, NJ 07105.
5. On October 22, 2025, Ndoye was transferred to Orange County Jail at 110 Wells Farm Road, Goshen, NY 10924 where he remains.
6. On November 11, 2025, Ndoye was sent DHS Form I-217, Information for Travel Document or Passport (“Form I-217”) to the Jail Liaison Unit (“JLU”).
7. On November 13, 2025, Ndoye informed ICE that he did not have any travel documents from Mali in his possession.
8. On November 19, 2025, a completed DHS Form I-217 and passport photos were received. The travel request packet was reviewed and finalized then sent to ICE Headquarters Regional International Operations for review and then submission to the Embassy of the Republic of Mali. The packet is under review and once completed, it will be submitted to the embassy.
9. 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. Once a request is made, the travel document can be issued within seven to ten days depending on the case. A travel document is generally valid for up to ninety days.

10. In Fiscal Year 2025 (October 1, 2024, to September 30, 2025), ICE has facilitated seventy-eight removals to Mali. Since January 2025, the Malian government has accepted Malian citizens who were deported from the United States.

11. The Headquarters Custody Determination Unit of ICE is responsible for making custody decisions for detained aliens with final orders of removal who have not been removed upon the expiration of the removal period or within a reasonable timeframe. This determination is done pursuant to 8 C.F.R. section 241.4.

Executed at New York New York on this 25<sup>th</sup> day of November 2025.

A handwritten signature in black ink, appearing to read 'M So', is written over a horizontal line.

Mincheol So  
Deportation Officer  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security