

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

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Mamadou Bocuom Ndoye )

Petitioner )

v. )

25-cv-8856 (VSB)

William Joyce, et al, )

Respondent )

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**PETITIONER’S MOTION FOR LEAVE TO FILE AMENDED HABEAS CORPUS**

Petitioner hereby moves this Court for Leave to file attached Amended Habeas Corpus pursuant to Federal Rule of Civil Procedure 15 and LR 7.1. For the reasons set forth in the accompanying Memorandum, petitioner respectfully request that this court grant it leave to file the Amended Habeas Corpus because it will help clarify petitioners arguments and will not cause prejudice to respondent as petitioner ask the court grant them ample time to reply if they so choose. The petitioner, respectfully request that the present amendment be taken in consideration

under Supreme Court precedent which has instructed the federal courts to liberally construe that when receiving a “pro se” submission from an petitioner the court must construe that motion and any supporting submissions liberally and with a measure of tolerance. See *Then v. INS*, 58 F. Supp, 2d 422, 429 (D.N.J. 1999), See *Cruz v. Berto*, 402 U.S. 319, 322(1972), *Conley v. Gibson*, 355 U.S. 41, 45-46(1957).

Respectfully Submitted,

\_\_\_\_\_  
Mamadou Bocuom Ndoye

Pro se

### **CERTIFICATE OF SERVICE**

This certifies that I placed a true and correct copy of this Motion for Leave to file amended complaint by placing said motion in the outgoing mail of the detention facility I am currently house in on \_\_\_\_\_ to the following addresses:

**John E. Gura, Jr**  
**Assistant United States Attorney**  
**86 chambers st, 3<sup>rd</sup> floor**  
**New York, NY 10007**  
**212-637-2712**

**ATTN: Pro SE Intake**  
**Pro Se Intake Unit**  
**United States District Court**  
**500 Pearl St**  
**New York, NY 10007**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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Mamadou Bocuom Ndoye	)	
Petitioner	)	25-cv-8856 (VSB)
v.	)	
William Joyce, et al,	)	First Amended Petition
Respondent	)	

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PETITION FOR WRIT OF HABEAS CORPUS  
PURSUANT TO 28 U.S.C. § 2241

**I. INTRODUCTION**

1. Respondents have unlawfully held petitioner Mamadou Bocuom Ndoye in immigration detention since his arrest, even though the federal government has no significant likelihood of removing him from the United States. Petitioner has been held at the DHS/ICE custody in New York State since his arrest on October 21, 2025.
2. On November 12, 2008, an immigration judge issued a final order of removal, ordering Petitioner removed to Mali.
3. Petitioner was held in ICE detention after the removal order while DHS/ICE attempted to locate a travel document from the government of Mali. On May 21, 2009, ICE

released petitioner on an order of supervision (“OSUP”) and issued him a release notification.

4. The respondent has revoked petitioner’s OSUP and claims to have detained petitioner for the purpose of removing him.
5. Mali did not provide a travel document for Petitioner in 2009 and while DHS claims that since January 2025, Mali has been accepting removals from the US, according to its own filing, DHS has not yet applied for a travel document for petitioner.
6. ICE has not alleged that that Petitioner is a risk of flight or a danger to the community prior to the additional detainment and has not submitted a copy of the Notice of Revocation of Release to show that it was issued in compliance with the regulations. ICE also has not provided Petitioner with the required process to revoke his OSUP
7. Because Petitioner’s recent detention is not tied to any foreseeable removal or to ensure that petitioner does not flee or pose a danger to the community prior to such removal, and because Petitioner has already been detained for longer than 6 months following his final order of removal, petitioner’s current detention violates 8 U.S.C. § 1231(a)(6), See *Zadvydas v. Davis*, 533 U.S. 678 (2001), *Wang v. Ashcroft*, 320 F.3d 130 (2d Cir. 2003). For the same reasons and because DHS violated its own regulations in revoking his OSUP, Petitioner’s detention violated the Due process clause of the Fifth Amendment of the United States Constitution. Accordingly, petitioner is entitled to an order requiring his immediate release and enjoining respondents from re-detaining him unless his removal is reasonably foreseeable and unless they follow the relevant regulations and respect his right to due process.

## II. JURISDICTION & VENUE

8. The Court has jurisdiction under 28 U.S.C. § 2241 and Article I, Section 9, Clause 2 of the U.S. Constitution (“Suspension Clause”), as petitioner is currently in custody under color of authority of the United States in violation of the Constitution, laws, or treaties thereof. To the extent that Respondent alleges that the jurisdiction stripping provision of 8 U.S.C. § 1252 deprives this court of jurisdiction, that argument is unavailing because Petitioner is challenging the revocation of his OSUP and his detention, not his removal. *Zadvydas* held that notwithstanding 8 U.S.C. § 1252(g), “§ 2241 habeas corpus proceedings remain available as a forum for statutory and constitutional challenges to post-removal-period detention.” 533 U.S. at 688. The Supreme Court subsequently held in *Jennings v. Rodriguez*, 583 U.S. 281, 292-93 (2018), that 8 U.S.C. § 1252(b) also does not strip habeas jurisdiction over challenges to detention.
  
9. Venue lies in the U.S. District Court for the Southern District of New York because petitioner is currently detained at Orange County Correctional Facility in Goshen, New York under the authority of respondent at the time of filing. The claims for which petitioner presents his petition 2241 occurred in New York state. 18 U.S.C. § 1391, 2241.

## III. PARTIES

10. Petitioner Mamadou Bocuom Ndoeye is a resident of New York who arrived in the United States without inspection. Petitioner is currently being detained for immigration purposes at the direction of the Department of Homeland Security’s ICE Office.

11. Respondent William Joyce is the Acting Director of the New York field office, U.S. Immigration and Customs Enforcement and is being sued in her official capacity.

#### IV. FACTS

12. Petitioner was born in Mali and is currently and has been living in the United States for decades. He is the father of 7 US Citizen children and is married to a US citizen.
13. On or about November 3, 2008, petitioner was ordered removed by an immigration judge. Mali was designated as the country of removal.
14. Petitioner was detained after his order of removal for 190 days before DHS released petitioner after not being able to acquire a travel document for his removal. He was then again briefly detained by DHS for five days in December 2009.
15. Upon his release petitioner was placed on Order of Supervision (“OSUP”).
16. During the past 16 years DHS/ICE has been unable to obtain a travel document from Mali to proceed with petitioners’ removal.
17. On the date of his arrest petitioner was on Canal Street when ICE/DHS raided the area and began arresting all people that were of foreign descent. The situation was so chaotic that even US Citizens were detained due to the color of their skin or foreign appearance. See Exhibit B.
18. During his arrest ICE did not have any indication from the government of Mali that they would receive a travel document or that one could be acquired or that the country of Mali found him eligible for repatriation.
19. Petitioner after his arrest was notified that his release had been revoked. ICE indicated that they were making all request to the Mali government to effectuate his removal.

However, ICE did not indicate nor has provided any document that the government of Mali has agreed or indicated that petitioner was eligible for repatriation.

20. The declaration of deportation officer Jonathan Quizhpi is attached as Exhibit A showing that no document has been obtained and that they have not received any correspondence from the government of Mali pertaining to petitioner since April 29, 2009.
21. The declaration is clear that they believe a removal would be done after a travel document is acquired but the record reflects that since 2008 the government of Mali has not provided any document that would be used to remove petitioner therefore it is highly unlikely to believe that one would be acquired now.

**V. FIRST CAUSE OF ACTION – UNLAWFUL DETENTION IN VIOLATION OF 8 U.S.C. SECTION 1231(a)**

22. The foregoing allegations are realleged and incorporated herein.
23. Petitioner is currently in the custody of the Respondent under or by color of the authority of the United States, based on his detainment at the current facility he is being held.
24. Petitioner's detention violates 8 U.S.C. § 1231.
25. DHS claims to be detaining Petitioner to effectuate his imminent removal. Yet DHS does not allege that they have even applied for a travel document for him yet. DHS alleges that Mali has begun accepting deportees from the United States since January 2025, but there is no indication that Mali has accepted Petitioner, in particular, for repatriation. Mali has not issued a travel document for Petitioner since 2009, despite repeated requests by DHS, and does not appear to have done so yet. As noted, DHS has yet to apply for a travel document for Petitioner.

26. Under *Zadvydas*, once the initial 180-day period following a final order of removal has passed, the government must have some objective reason (not just a subjective desire) to believe that removal is at all possible before it can deprive someone of their liberty without further review. Respondent claims that Petitioner has only been detained since October 21, 2025. But *Zadvydas* is about how long an individual has been detained following a final order of removal. By Respondent's own representation, Petitioner was detained at the very least from November 12, 2008 until May 21, 2009; from December 16, 2009 until December 21, 2009; and since October 21, 2025: for 216 days and counting. The 90-day removal period set forth in 8 U.S.C. § 1231(a)(1)(A) commenced following the final removal order against Petitioner and expired on February 10, 2009. The 180-day presumptively reasonable period under 8 U.S.C. § 1231(a)(6) as interpreted by *Zadvydas* expired on May 11, 2009, over 16 years ago. Petitioner was detained by DHS for the entirety of that period, and DHS cannot now "restart the clock" by deciding to detain Petitioner now.
27. As the District of New Jersey recently held in *Tadros v. Noem*, No. 25-cv-4108 (EP), 2025 WL 1678501, \*3 (D.N.J. June 13, 2025): "*Tadros* has the better argument under *Zadvydas*. The 90-day removal period under 8 U.S.C. § 1231(a)(1)(B) was triggered [when the grant of relief under the CAT became administratively final]. *Tadros* was released two days later. *Tadros*'s release suggests he was determined not to present a flight risk, and that the Government was unlikely to find a third country to accept him in the reasonably foreseeable future. Further, *Tadros* has demonstrated there is no significant likelihood of his removal in the reasonably foreseeable future because fifteen years have gone by without the Government securing a third country for his removal.

Respondents' sole statement that "ICE has been making efforts to facilitate Petitioner's removal to a country other than Egypt" is insufficient to rebut the presumption established by Tadros." The District of Maryland agreed in *Cordon-Salguero v. Noem*, Civ. No. 1:25-cv-1626-GLR, Dkt. No. 20 (D. Md. June 18, 2025). See also *Alam v. Nielsen*, 312 F. Supp. 574, 581-82 (S.D. Tex. 2018) (rejecting the argument that the Section 1231(a)(1)(A) removal period is restarted when a noncitizen is re-detained for the purposes of removal); *Escalante v. Noem*, No. 9:25-CV-00182- MJT, 2025 WL 2206113, at \*3 (E.D. Tex. Aug. 2, 2025), citing *Nguyen v. Hyde*, No. 25-cv-11470, 2025 WL 1725791 (D. Mass. June 20, 2025).

28. The habeas court "ask[s] whether the detention in question exceeds a period reasonably necessary to secure removal." *Zadvydas*, 533 U.S. at 699. It "should measure reasonableness primarily in terms of the statute's basic purpose, namely, assuring the alien's presence at the moment of removal. Thus, if removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by statute." *Id.* at 699-700. Under *Zadvydas*, once 180 days have elapsed since the start of the removal period, even just one more day of post-removal-period detention could be found unreasonable if not justifiable by the statute's basic purpose of assuring the non-citizen's presence at the moment of removal.

29. Here, Petitioner has been detained beyond the presumptively reasonable period, and DHS has not shown that removal is reasonably foreseeable.

## **VI. SECOND CAUSE OF ACTION – UNLAWFUL DETENTION IN VIOLATION OF U.S. CONSTITUTION, FIFTH ADMENDMENT**

30. The following allegations are realleged and incorporated herein.

31. Petitioner is currently in the custody of the respondent under or by color of the authority of the United States, based on his detention.
32. Petitioner detention violates the U.S. Constitution because DHS violated its own regulations when they detained him.
33. 8 C.F.R. § 241.4 sets forth various procedures for the “[c]ontinued detention of inadmissible, criminal, and other aliens beyond the removal period,” including, as relevant here, procedures for both release and the revocation of release. 8 C.F.R. § 241.4(d), (l). Paragraph (d)(1) permits certain designated officials to “release an alien if the alien demonstrates to the satisfaction of the Attorney General or her designee that his or her release will not pose a danger to the community or to the safety of other persons or to property or a significant risk of flight pending such alien’s removal from the United States.” Id. § 241.4(d)(1). It also requires “[a] copy of any decision ... to release or to detain an alien to be provided to the detained alien.” Id. § 241.4(d). Paragraph (l) concerns revocation of that supervised release. Under paragraph (l)(2), “[t]he Executive Associate Commissioner shall have authority, in the exercise of discretion, to revoke release and return to Service custody” a noncitizen who was previously released. Id. § 241.4(l)(2). Pursuant to paragraph (l)(2), a noncitizen’s release “may be” revoked if, “in the opinion of the revoking official,”:
  - (i) The purposes of release have been served;
  - (ii) The alien violates any condition of release;
  - (iii) It is appropriate to enforce a removal order or to commence removal proceedings against an alien; or
  - (iv) The conduct of the alien, or any other circumstance, indicates that release would no longer be appropriate.

Id. Paragraph (l)(1), entitled “Violation of conditions of release,” provides that “[u]pon revocation, the alien will be notified of the reasons for revocation of his or her release or parole,” as well as “an initial informal interview promptly after his or her return to [ICE] custody to afford the alien an opportunity to respond to the reasons for revocation stated in the notification.” Id. § 241.4(l)(1). Paragraph (l)(3) discusses “[t]iming of review when release is revoked.” Id. § 241.4(l)(3).

34. Respondent here seems to be saying that Petitioner’s OSUP was revoked under subparagraph (l)(2), which allows for discretionary revocation of an OSUP. But District Courts, including the Southern District of NY in *Zhu v. Genalo*, No. 1:25-cv-06523 (JLR), 2025 WL 2452352 (S.D. NY August 26, 2025), have held that redetention under section 241.4 – including subparagraph (l)(2) - requires notice and an informal interview. See also, *Perez-Escobar v. Moniz*, — F. Supp. 3d —, 2025 WL 2084102 (D. Mass. July 24, 2025); *M.S.L. v. Bostock*, No. 25-cv-01204, 2025 WL 2430267, at \*11 (D. Or. Aug. 21, 2025); *Zhen Yi Mei v. Doe*, No. 25-cv-01507, 2025 WL 2258586, at \*10 n.19 (N.D. Ohio Aug. 7, 2025); *Orellana v. Baker*, 2025 U.S. Dist. LEXIS 164986, 2025 WL 2444087 (D. Md. Aug. 25, 2025). Alternatively, if DHS’ position is that his OSUP was revoked under subsection (l)(1), the requirement for additional process is explicit in the next of the regulation. Here, Petitioner was not afforded this process, and thus Respondents violated its own regulations in detaining him. Respondent may allege that Petitioner has no due process interest in DHS following the regulations about a discretionary revocation of his OSUP, because a non-citizen does not enjoy the protections of the Fifth Amendment in the government’s exercise of its discretion. But that would be an error. “Freedom from imprisonment—from government custody,

detention, or other forms of physical restraint—lies at the heart of the liberty [the Due Process] Clause protects.” *Zadvydas*, 533 U.S. at 690.

35. Moreover, 8 C.F.R. § 241.4(1)(2) authorizes only the Executive Associate Commissioner or a District Director to revoke release of an alien. As the Court explained in *Ceesay v. Kurzdorfer*, 781 F.Supp.3d 137 (2025), under the current structure of DHS, the officials with the power to revoke release after making certain findings include field office directors and any other official “delegated the function or authority ... for a particular geographic district, region, or area.” See 8 C.F.R. §§ 1.2, 241.4(1)(2). Petitioner requests that the court examine the Notice of Revocation of Release described in DHS’ declaration to determine who revoked his release and whether it was the appropriate official. If it was not, Petitioner’s release was unlawfully revoked and he should be released for that reason alone.

36. The *Ceesay* Court opined:

“It may be easy to say that we want noncitizens who are in this country illegally removed immediately. It may be popular to say that noncitizens who—at least allegedly—are members of violent gangs should be deported without a hearing. But how do we know that someone is who the arresting officers say he is? How do we know that a correctly identified noncitizen is a violent gang member and not a family man working hard to put food on the table of his wife and kids? How can anyone feel safe from being swept up and put in jail or deported simply based on being targeted by the government? More to the point: how can we pride ourselves on being a nation of laws if we are not willing to extend that most fundamental right to all—if we are not at least willing to ask, before we lock you up, do you have anything to say?”

The answer is simple: due process. Everyone—citizen and noncitizen, the innocent and the guilty—is entitled to that sacred right. Ceasay did not get that here. And for that reason, even if ICE regulations did not give him the right to an informal interview, he still would be released.”

37. The same reasoning should apply here, and Petitioner should be released. A judicial order requiring petitioners to be released from custody could remedy respondent’s unlawful conduct.

#### **VII. PETITIONER’S DETENTION VIOLATES THE APA**

38. Petitioner argues that Respondent’s decision to revoke his OSUP and detain him was arbitrary and capricious and thus violated the Administrative Procedure Act.
39. Finally, Petitioner argues that federal agencies are “‘obliged to abide by the regulations [they] promulgate[],’ including [their] own internal operating procedures.” *Backcountry Against Dumps v. Fed. Aviation Admin.*, 77 F.4th 1260, 1267 (9th Cir. 2023) (quoting *Sameena Inc. v. U.S. Air Force*, 147 F.3d 1148, 1153 (9th Cir. 1998)). “This is especially true ‘[w]here a prescribed procedure is intended to protect the interests of a party before the agency.’” *Id.* (quoting *Sameena Inc.*, 147 F.3d at 1153).
40. Petitioner argues that ICE’s decision to change its initial position and revoke his release lacks the reasoned decision-making necessary to survive arbitrary and capricious review. There is no contemporaneous documentation or evidence explaining the agency’s decision to revoke petitioner OSUP as no contact had been made with the government of Mali prior to his revocation and until this date.

41. Thus, ICE's revocation decision is arbitrary and capricious.

**PRAYER FOR RELIEF**

- A. Order that Respondent immediately release petitioner
- B. Order that Respondents DHS and ICE immediately release petitioner, if he is subsequently transferred from his current detention to any other facility thereafter;
- C. Order that Respondents provide the Court and petitioner with at least two days' notice prior to any removal from New York.
- D. Award Petitioner attorney's fees and costs pursuant to the Equal Access to Justice Act, and on any other basis justified under the law; and
- E. Grant such other relief that is deemed just and proper by the Court.

Respectfully submitted,

\_\_\_\_\_

Mamadou Bocuom Ndoye

Pro Se

Dated: \_\_\_\_\_

# Exhibit A

1. Sworn Declaration of Deportation Officer JONATHAN QUIZHPI

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----X  
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.

-----X

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 Bocoum 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.

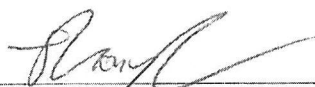
22. ICE is currently working to obtain travel documents from Mali to effectuate Ndoye’s removal.

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