

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS**

BORIS PHILIP KASSAP,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 25-3277-JWL
	)	
CRYSTAL CARTER, Warden,	)	
Leavenworth Federal Correctional Institution,	)	
BRADLEY MCNAIR, Deportation Officer	)	
TODD LYONS, Acting Director, ICE	)	
KRISTI NOEM, Secretary, Department of	)	
Homeland Security,	)	
PAM BONDI, Attorney General	)	
	)	
Respondents.	)	
	)	

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**RESPONSE TO § 2241 HABEAS PETITION AND ORDER TO SHOW CAUSE**

This matter is before the Court on the petition of Boris Kassap (“Petitioner”) for a writ of habeas corpus under 28 U.S.C. § 2241. Petitioner, a noncitizen, alleges that he is being unlawfully detained at Leavenworth Federal Correctional Institution, pending removal from the United States. He seeks release from detention on the basis that his detention violates 8 U.S.C. § 1231(a), the Fifth Amendment, and constitutional and human rights concerns. In compliance with the Court’s Order to Show Cause, Doc. 3, Kristi Noem,<sup>1</sup> Secretary, U.S. Department of Homeland Security; Bradley McNair, ICE Deportation Officer; Todd Lyons, Acting ICE Director; Pam Bondi, Attorney General; and Crystal Carter, Warden, FCI Leavenworth (collectively “Respondents”) respectfully submit this response. The § 2241 habeas petition should be denied. Petitioner has been uncooperative with ICE activities, thereby tolling his time of detention. Moreover, he cannot provide a showing there is no significant likelihood of removal in the reasonably foreseeable

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<sup>1</sup> Petitioner originally named Alejandro Mayorkas as Secretary of the Department of Homeland Security. The correct defendant in this official capacity is Kristi Noem.

future. Petitioner's case involves a complicated set of facts and ICE has been working diligently to remove him to an appropriate country.

#### STATEMENT OF FACTS

The following facts are based on the declaration of Bradley McNary, a Deportation Officer for ICE Enforcement and Removal Operations ("ERO") of the United States Department of Homeland Security ("DHS"). Exhibit 1, McNary Decl. ¶¶ 1-3. Petitioner is a native and citizen of Union of Soviet Socialist Republics ("USSR"). *Id.* ¶ 5. On or about March 29, 1990, Petitioner was admitted to the United States at Tucson, Arizona, on an R-2 visa. *Id.* ¶ 6. On or about June 18, 1996, the Petitioner adjusted status to that of a Lawful Permanent Resident ("LPR"). *Id.* ¶ 7. On June 19, 2017, the Petitioner was convicted in the Nueces County Court in Nueces, Texas for the offense of possession of a controlled substance (less than 28 grams), in violation of Texas Health and Safety Code (HS) § 481.117(a). Petitioner was sentenced to three days. *Id.* ¶ 8. The Petitioner's criminal history also includes: (a) arrested on August 8, 1998 in Corpus Christi, Texas for driving while intoxicated; sentenced to 90 days confinement; (b) arrested on November 6, 2002 in Portland, Texas for driving while intoxicated 2nd; case dismissed; (c) arrested on June 28, 2013 in Corpus Christi, Texas for possession of a controlled substance (1-4 grams); case rejected; (d) arrested on September 1, 2021 in Corpus Christi, Texas for possession of a controlled substance (1-4 grams); case dismissed; (e) arrested on March 27, 2023 in Corpus Christi, Texas for forgery; case pending; (f) arrested on April 27, 2023 in Corpus Christi, Texas for criminal trespass; case rejected. *Id.* ¶ 9.

On or about May 10, 2024, ICE lodged a detainer on Petitioner. *Id.* ¶ 10. On or about May 10, 2024, Petitioner was taken into ICE custody and detained at the Costal Bend Detention Facility in Robstown, Texas. He was also issued a Notice to Appear ("NTA," Form I-862), thereby placing

him in removal proceedings before an Immigration Judge. *Id.* ¶ 11. The NTA alleged, in part, that Petitioner is a native and citizen of the USSR and removable from the United States under Section 237(a)(2)(B)(i) of the Immigration and Nationality Act (“INA”), for being convicted of violating any law or regulation relating to a controlled substance. *Id.* ¶ 12. On or about May 11, 2024, Petitioner was transferred to the Port Isabel detention facility in Los Fresnos, Texas. *Id.* ¶ 13. On June 27, 2024, Petitioner appeared in custody before the Immigration Judge for his initial master calendar hearing. The Immigration Judge continued Petitioner’s case until July 11, 2024, giving Petitioner time to file applications for relief. *Id.* ¶ 14. On July 6, 2024, Petitioner was transferred to the Houston Contract Detention Facility in Houston, Texas. On July 11, 2024, he was transferred to the Port Isabel detention facility in Los Fresnos, Texas. *Id.* ¶ 15. On July 18, 2024, Petitioner appeared in custody before the Immigration Judge for his second master calendar hearing. The Immigration Judge sustained the charge of removability. Petitioner refused to designate a country of removal; the Immigration Judge designated Russia. The Immigration Judge continued Petitioner’s case to July 25, 2024, giving Petitioner more time to file applications for relief. *Id.* ¶ 16. On July 25, 2024, Petitioner appeared in custody before the Immigration Judge for his third master calendar hearing. The Immigration Judge continued Petitioner’s case to August 1, 2024, giving the Petitioner one last continuance to file applications for relief. *Id.* ¶ 17. On August 1, 2024, Petitioner appeared in custody before the Immigration Judge for his fourth master calendar hearing. Petitioner submitted his application for relief and the Immigration Judge continued Petitioner’s case to September 13, 2024, to consider the merits of Petitioner’s application for relief. *Id.* ¶ 18. The Immigration Judge held a hearing on September 13, 2024, to consider Petitioner’s application for relief. At the conclusion of the hearing, Petitioner was ordered removed from the United States to Russia. Appellate rights were reserved, and any appeal of the

Immigration Judge's decision was due to the Board of Immigration Appeals ("BIA") within 30 calendar days. No appeal was taken of the Immigration Judge's decision by either party, making the order final upon the lapse of the appeal period. *Id.* ¶ 19.

Pursuant to 8 U.S.C. § 1231(a)(1)(A), an alien who has been ordered removed, shall be removed from the United States within 90 days. At or near 90 days post removal order, if an alien has not been removed, ERO conducts a File Custody Review, also known as a Post-Order Custody Review ("POCR"), to determine the necessity of continued custody. When conducting a 90-day POCR, some factors that are considered are the following: a detained individual's flight risk, any danger the individual may pose to his or her community, threat to national security, and whether there is significant likelihood of removal in the reasonably foreseeable future ("SLRRFF"). Based on this information, a recommendation will be made to management as to whether the individual should remain in custody. Those managers, including the Supervisory Deportation and Detention Officer, Assistant Field Office Director, Deputy Field Office Director and the Field Office Director, will either concur in the assessment to continue detention or request release of the alien. *Id.* ¶ 20.

In cases where an alien has been detained pursuant to a final order for 180 days, a Transfer Checklist will be completed with information related to follow-up actions taken to obtain a travel document after the initial 90-day POCR and every 90 days thereafter. The Transfer Checklist contains information, such as the alien's biographical information, whether there is a judicial stay in effect, whether there is a habeas petition pending at the time of review, whether the particular case is a national security case, whether the alien has medical or psychological issues, and whether and how often an Embassy person has been contacted for the status of a travel document. This checklist is then transferred to the ICE/ERO Headquarters POCR Unit, which makes the ultimate

decision on the individual's continued detention beyond the 180 days, or every 90 days thereafter, based on the SLRRFF. *Id.* ¶ 21.

If an alien refuses to make timely application for travel documents or conspires or acts to conspire to prevent his removal, the alien's removal period is to be extended. A Notice of Failure to Comply is to be served on the alien advising him of the reason for the extension of the removal period and the actions needed to restart the removal period. The alien shall be considered for criminal prosecution pursuant to 8 U.S.C. 1253(a). Until the alien has come into compliance, the case will remain under field jurisdiction, and the field will complete an informal review every 30 days to determine if the alien has come into compliance with the requirement. If the alien is continued in detention after the new review, the field will retain jurisdiction for 90 days after the decision before referring the case to ICE/ERO Headquarters. *Id.* ¶ 22.

On or about November 15, 2024, ERO Port Isabel sent Petitioner a Travel Document form to complete. *Id.* ¶ 23. On November 22, 2024, Petitioner was transferred to the Kay County, Oklahoma detention center in Newkirk, Oklahoma. *Id.* ¶ 24. On or about November 25, 2024, ERO Kansas City contacted ICE/ERO Headquarters to inquire whether there is SLRRFF to Russia. On or about November 27, 2024, ICE/ERO Headquarters informed ERO Kansas City that there is SLRRFF to Russia and ERO Kansas City noted that travel documents were needed. *Id.* ¶ 25. On December 4, 2024, Petitioner refused to complete any travel document paperwork for Russia and maintained that he is a citizen of the USSR. Petitioner stated that he would like to be removed to Canada. ERO Kansas City placed Petitioner on Failure to Comply status. *Id.* ¶ 26. On or about December 5, 2024, ERO Wichita sent a Form I-217, Information for Travel Document or Passport, to ERO Kansas City. *Id.* ¶ 27. On or about December 12, 2024, Petitioner again informed ERO Kansas City that he would not assist in any capacity to obtain travel documents for Russia and

requested to be removed to either Canada or the Dominican Republic. *Id.* ¶ 28. On or about December 16, 2024, ERO Wichita sent travel document paperwork and Form I-229(a), Warning for Failure to Depart, to ERO Kansas City. *Id.* ¶ 29. On or about December 18, 2024, ERO Kansas City sent Form I-241, Acceptance of Alien, to Canada and the Dominican Republic. On December 19, 2024, the Dominican Republic refused to accept the Petitioner. On December 23, 2024, Canada refused to accept the Petitioner. *Id.* ¶ 30.

On or about January 13, 2025, ICE/ERO Headquarters reviewed Petitioner's applications for relief and determined that Petitioner may be a native and citizen of Moldova based on the Petitioner's statement that he was born and resided in the territory of Moldova. ICE/ERO Headquarters recommended ERO Kansas City submit a quality Travel Document Request ("TDR") to the Moldovan consulate for an official response. *Id.* ¶ 31. On or about January 14, 2025, ERO Kansas City sent Form I-217, Information for Travel Document or Passport, to ERO Wichita for Petitioner to complete. *Id.* ¶ 32. On or about January 15, 2025, Petitioner again refused to fill out Form I-217, Information for Travel Document or Passport. ERO Kansas City served Petitioner with Notice of Failure to Comply. *Id.* ¶ 33. On or about January 17, 2025, ERO Kansas City requested Petitioner's passport photo and signature on travel documents. *Id.* ¶ 34. On or about January 21, 2025, Petitioner sent an incomplete Form I-217, Information for Travel Document or Passport, to ERO Kansas City. *Id.* ¶ 35. On or about January 23, 2025, ERO Kansas City received Petitioner's passport photo and sent a TDR packet to ICE/ERO Headquarters for review. *Id.* ¶ 36. On or about January 27, 2025, ERO Wichita sent travel document paperwork and Form I-229(a), Warning for Failure to Depart, to ERO Kansas City. *Id.* ¶ 37. On or about January 31, 2025, ERO Kansas City sent a TDR to the Moldovan consulate. *Id.* ¶ 38.

On or about February 4, 2025, ERO Kansas City sent Form I-229(a), Warning for Failure to Depart, to ERO Wichita for Petitioner's signature. This was the third attempt to obtain Petitioner's signature. *Id.* ¶ 39. On or about February 6, 2025, ERO Kansas City provided additional information regarding the Petitioner's identity and birth to the Moldovan consulate. *Id.* ¶ 40. On or about February 10, 2025, ERO Kansas City contacted the Moldovan consulate inquiring about an interview between the consulate and Petitioner. *Id.* ¶ 41. On or about February 10, 2025, ERO Kansas City served Petitioner with Notice of Failure to Comply, signed by AFOD Christopher Chamberlain, and Form I-229(a), Warning for Failure to Depart. On or about February 11, 2025, Petitioner refused to sign these documents and ERO Kansas City contacted ICE/ERO Headquarters to request assistance in completing the TDR. *Id.* ¶ 42. On or about February 12, 2025, ERO Kansas City contacted the U.S. Attorney's Office in the Western District of Oklahoma regarding possible prosecution under 8 U.S.C. 1253(a) for Petitioner's failure to comply. On or about February 14, 2025, ERO Kansas City spoke with Petitioner regarding possible prosecution for failure to comply. Thereafter, Petitioner agreed to complete a TDR for Russia. *Id.* ¶ 43. On or about February 19, 2025, ERO Kansas City spoke with Petitioner regarding the TDR for Russia. The Petitioner refused to fill out the TDR and asked to speak to his attorney. ERO Kansas City attempted to contact Petitioner's attorney, but he was unavailable. *Id.* ¶ 44. On or about February 20, 2025, ERO Wichita returned Form I-229(a), Warning for Failure to Depart, to ERO Kansas City. *Id.* ¶ 45.

On March 3, 2025, Petitioner was transferred to the United States Penitentiary in Leavenworth, Kansas. *Id.* ¶ 46. On or about March 27, 2025, ERO Kansas City contacted the Moldovan consulate for an update regarding the pending TDR. *Id.* ¶ 47. On or about March 27, 2025, ERO Kansas City contacted the U.S. Attorney's Office in the District of Kansas regarding

possible prosecution under 8 U.S.C. 1253(a) for Petitioner's failure to comply. On or about March 29, 2025, the U.S. Attorney's Office in the District of Kansas accepted the case for prosecution. *Id.* ¶ 48. On or about April 22, 2025, ERO Kansas City contacted the Moldovan consulate for an update regarding the pending TDR. *Id.* ¶ 49. On or about May 5, 2025, the Moldovan consulate informed ERO Kansas City that they will not consider accepting the Petitioner until he applies for Moldovan citizenship. As it remains, the Petitioner has not applied for Moldovan citizenship. *Id.* ¶ 50. On or about May 12, 2025, AFOD Chamberlain signed a Notice of Failure to Comply. On May 14, 2025, ERO Kansas City served this form and a Form I-229(a) on the Petitioner. This same day, the Petitioner signed Form I-229(a). *Id.* ¶ 51. On or about May 16, 2025, ERO Kansas City sent the TDR for Russia to the Petitioner to complete. *Id.* ¶ 52. On or about May 22, 2025, ERO Kansas City completed the TDR for Russia and on or about June 11, 2025, sent it to ICE/ERO Headquarters for review. *Id.* ¶ 53.

On or about June 13, 2025, ERO Kansas City completed a 90-day POCR and determined it would continue to detain Petitioner. *Id.* ¶ 54. On or about June 17, 2025, ICE/ERO Headquarters reviewed the TDR for Russia and contacted ERO Kansas City regarding the status of prosecution by the U.S. Attorney's Office in the District of Kansas. *Id.* ¶ 55. On or about June 19, 2025, ERO Kansas City withdrew its prosecution under 8 U.S.C. § 1253(a) of Petitioner for his failure to comply because he completed the TDR for Russia. *Id.* ¶ 56. On or about June 29, 2025, ICE/ERO Headquarters reviewed the TDR for Russia and requested ERO Kansas City conduct a case review to determine nexus to another country. *Id.* ¶ 57. On or about June 30, 2025, ICE/ERO Headquarters returned the TDR for Russian to ERO Kansas City. The TDR remains pending at this time. *Id.* ¶ 58.

On or about July 24, 2025, ERO Kansas City served the Petitioner with Notice of Interview for Review of Custody Status. On or about August 27, 2025, ERO Kansas City conducted an 180-day POCR interview and sent the memo to ICE/ERO Headquarters for review. The review remains pending at this time. *Id.* ¶ 59. On or about August 27, 2025, ERO Kansas City sent Petitioner’s TDR for Moldova to ICE/ERO Headquarters. *Id.* ¶ 60. On or about November 4, 2025, ERO Kansas City contacted ICE/ERO Headquarters for an update on this request. ICE/ERO Headquarters informed ERO Kansas City that Petitioner is stateless and that the U.S. Department of State has not provided a third country of removal for Moldovan citizens. *Id.* ¶ 61. On or about December 24, 2025, ERO Kansas City contacted ICE/ERO Headquarters regarding the status of Petitioner’s TDR for Moldova. *Id.* ¶ 62. ICE will continue its efforts to identify alternative countries to which Petitioner can be removed. *Id.* ¶ 64.

Petitioner filed a habeas petition before this Court on December 30, 2025. (Doc. 1)

### ARGUMENT

“The federal district courts have habeas corpus jurisdiction to consider the statutory and constitutional grounds for immigration detention that are unrelated to a final order of removal.” *Zhiriakov v. Barr*, No. 20-3141-JWL, 2020 WL 3960442, \*6 (D. Kan. July 13, 2020). To obtain habeas corpus relief, a petitioner must demonstrate that “[h]e is in custody in violation of the Constitution or laws or treaties of the United States[.]” 28 U.S.C. § 2241(c)(3).

#### **I. Petitioner’s Noncooperation Tolls the Removal Period.**

As recently as February 19, 2025 Petitioner failed to cooperate with ICE efforts to remove him by refusing to sign travel documents to Russia. Petitioner’s noncooperation tolls the time frame related to reasonableness. The law provides that “[t]he removal period shall be extended beyond a period of 90 days and the alien may remain in detention during such extended period” if

the alien “conspires or acts to prevent the alien’s removal subject to an order of removal.” 8 U.S.C. § 1231(a)(1)(C); *see also Madej v. Garland*, No. 22-3303-JWL, 2023 WL 1396195, at \*2 (D. Kan. Jan. 31, 2023) (invoking § 1231(a)(1)(C) where the petitioner “repeatedly refused to sign documents and complete applications” to obtain a passport).

**II. All Counts fail because Petitioner has not shown removal is unlikely, or alternatively, Respondents can rebut any such showing.**

Petitioner is detained pursuant to the INA. Under the INA, an alien shall be removed if the alien is present in the United States in violation of the INA. 8 U.S.C. § 1227(a)(1)(B). Here, Petitioner was charged as inadmissible to the United States pursuant to sections 237(a)(2)(B)(i) of the Immigration and Nationality Act (“INA”), for being convicted of violating any law or regulation relating to a controlled substance. On July 18, 2025, an Immigration Judge sustained the charge of removability and designated Russia as the country of removal. On September 13, 2024, the Immigration Judge considered Petitioner’s application for relief and again ordered Petitioner removed to Russia. Since no appeal was filed with the BIA, the Immigration Judge’s order is a final administrative order pursuant to 8 C.F.R. § 1241.1.

Upon the entry of a final removal order, “the Attorney General ‘shall detain the alien’ during the 90-day removal period established under 8 U.S.C. § 1231(a)(2).” *Zhiriakov*, 2020 WL 3960442, at \*8 (citations omitted). “Generally, the government is required to remove the alien held in its custody within the 90-day removal period.” *Garcia Uranga v. Barr*, No. 20-3162-JWL, 2020 WL 4334999, \*4 (D. Kan. July 27, 2020) (citing 8 U.S.C. § 1231(a)(1)(A)-(B)). Nevertheless, “[i]f removal cannot be carried out within the removal period, inadmissible aliens may be detained beyond the removal period under certain circumstances.” *Id.* (citing 8 U.S.C. § 1231(a)(6)).

Specifically, “the detention of an alien subject to a final order of removal for up to six months is presumptively reasonable in view of the time required to accomplish removal.”

*Zhiriakov*, 2020 WL 3960442, at \*8 (citing *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001)). “Beyond that period, if the alien shows that there is ‘no significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing.’” *Garcia Uranga*, 2020 WL 4334999, at \*4 (quoting *Zadvydas*, 533 U.S. at 701). “The six-month presumption” thus “does not mean that every alien must be released after that time, but rather an alien may be detained ‘until it has been determined that there is no significant likelihood of removal in the reasonably foreseeable future.’” *Zhiriakov*, 2020 WL 3960442, at \*8 (quoting *Zadvydas*, 533 U.S. at 701).

Here, Petitioner’s claims should be denied. He has not demonstrated “good reason to believe” that there is no significant likelihood of removal in the reasonably foreseeable future. The Petition cites no facts to support his position that removal will not occur in the reasonably near future. In effect, Petitioner is arguing that removal to Russia or a third country is unlikely because it hasn’t happened yet. That is not enough. *See Masih v. Lowe*, No. 4:24-CV-01209, 2024 WL 4374972, at \*3 & n.32 (M.D. Pa. Oct. 2, 2024) (“[T]he fundamental basis of [petitioner’s] argument appears to be that his removal is unlikely simply because it has not occurred to this point[.]”) (citation modified). Stated differently, “[s]peculation and conjecture are not sufficient to carry this burden, nor is a lack of visible progress” in Petitioner’s removal “sufficient, in and of itself, to show that no significant likelihood of removal exists in the reasonably foreseeable future.” *Tawfik v. Garland*, No. H-24-2823, 2024 WL 4534747, at \*3 (S.D. Tex. Oct. 21, 2024) (citation modified). “Because ICE is still actively pursuing” Petitioner’s removal “and his detention furthers Congress’s goal of ensuring his presence for removal,” Petitioner “is, therefore, not entitled to release under *Zadvydas*.” *Bains v. Garland*, No. 2:23-cv-00369-RJB-BAT, 2023 WL 3824104, at \*4 (W.D. Wash. May 16, 2023).

Petitioner has not provided competent evidence to show that removal to Russia, Moldova or any other country is unlikely. *See, e.g., Soudom v. Warden*, No. 25-3063-JWL, 2025 WL 1594822, at \*2 (D. Kan. May 23, 2025) (denying relief where the petitioner did not carry his initial burden, in part because “[t]he letter on which petitioner relies does not foreclose the possibility of his removal”); *Ogole v. Garland*, No. 24-3198-JWL, 2025 WL 548452, at \*2 (D. Kan. Feb. 19, 2025) (denying relief where the petitioner did not carry his initial burden by asserting “his country has a ‘freeze on deportation,’” as this argument was “made without supporting evidence” and belied by other facts in the record). All Counts should be denied on this basis alone.

Respondents acknowledge that the Court previously has been presented with the foregoing legal authorities in cases where habeas petitions were granted. *E.g., Diaz-Cruz v. Noem*, No. 25-cv-3162 (D. Kan. Oct. 2, 2025), ECF 7 at 1-6; *Vargas v. Noem*, No. 25-3155-JWL, 2025 WL 2770679, at \*2-3 (D. Kan. Sept. 29, 2025); *Anduaga-Colin v. Bondi, et al.*, No. 25-3151-JWL, 2025 WL 2926546, at \*2-3 (D. Kan. Oct. 15, 2025); *Ibarra Moreno v. Bondi*, No. 25-3168-JWL, 2025 WL 2926547, at \*2-3 (D. Kan. Oct. 15, 2025); *Mango v. CARTER et al.*, No. 25-3183-JWL, 2025 WL 2841209, at \*2-3 (D. Kan. Oct. 7, 2025) *Zhuzhiashvili v. Carter*, No. 25-3189-JWL, 2025 WL 2837716, at \*2-3 (D. Kan. Oct. 7, 2025). Even so, Respondent believes each Petition must be evaluated individually based on its own unique facts and circumstances.

In any event, even if Petitioner had made an initial showing that removal is unlikely, Respondents have now rebutted it. ICE has worked diligently to remove Petitioner. When he refused to cooperate with removal efforts to Russia, ICE endeavored to remove him to his preferred countries, Canada and the Dominican Republic. More recently, ICE has also explored removal to Moldova which remains pending. Removal to Russia also remains pending. ICE is continuing its

efforts to effectuate removal. All of this defeats any assertion there is no significant likelihood of removal.

### CONCLUSION

For the foregoing reasons, the Court should enter judgment against Petitioner on his § 2241 habeas petition.

Respectfully submitted,

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Counsel for Respondents

### CERTIFICATE OF SERVICE

I certify that on January 23, 2026, the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which will provide notice to all registered parties. I further certify that a copy was sent by first class mail to:

Boris Kassap  
FCI Leavenworth  
  
PO Box 1000  
Leavenworth, KS 66048

s/ Christopher Allman  
Christopher Allman