IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IBRAHIM DIA	:	
	:	
Petitioner,	:	
	:	
v.	:	Civil Action No. 2:26-cv-1669 (Henry)
	:	
JAMAL L. JAMISON, ET AL.,	:	
	:	
Respondents.	:	

RESPONSE IN OPPOSITION TO PETITION
FOR WRIT OF HABEAS CORPUS

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Dated: March 19, 2026

I. INTRODUCTION

Petitioner seeks a writ of habeas corpus, challenging the lawfulness of his detention pending removal under the Immigration and Nationality Act (INA), 8 U.S.C. § 1231, after Immigration and Customs Enforcement (ICE) revoked his Order of Supervision. **This petition is distinguishable from the numerous petitions recently considered by this Court in the wake of the Board of Immigration Appeals' (BIA) decision in *Matter of Hurtado*, 29 I&N Dec. 216 (BIA 2025), which is not implicated here**. *See e.g., Cantu-Cortes v. O'Neill, et al.*, No. 25-cv-6338, 2025 WL 3171639, at *1-2 (E.D. Pa. Nov. 13, 2025) (Kenney, J.); *Anirudh v. McShane, et al.*, No. 25-cv-6458 (E.D. Pa. Dec. 8, 2025) (Bartle, J.); *Juarez Velazquez v. O'Neill, et al.*, No. 25-cv-6191 (E.D. Pa. Dec. 3, 2025) (Henry, J.). The cases cited above address immigration detention of individuals who do not have final orders of removal.

In this case, however, Petitioner is an alien with a final order of removal that ICE intends to effectuate in the reasonably foreseeable future. The statutory provision governing Petitioner's detention is 8 U.S.C. § 1231 not 8 U.S.C. § 1225(b)(2)(A). As discussed below, because Petitioner's detention comports with the INA, the regulations, the Fifth Amendment to the U.S. Constitution, and the Administrative Procedures Act, the Court should deny the petition for writ of habeas corpus.

II. DETENTION FRAMEWORK UNDER THE INA AND REGULATIONS

In general, when an alien in detention is ordered removed, the INA provides the United States with ninety days to execute the removal. 8 U.S.C. § 1231(a)(1)(A). This "removal period" begins to run on the latest of three dates:

(i) The date the order of removal becomes administratively final.
(ii) If the removal order is judicially reviewed and if a court orders a stay of the removal of the alien, the date of the court's final order.
(iii) If the alien is detained or confined (except under an immigration process), the date the alien is released from detention or confinement.

Id. § 1231(a)(1)(B). During the removal period, the Attorney General is required to detain certain criminal aliens. *See id.* § 1231(a)(2)(A). Moreover, the detention of certain aliens, including inadmissible aliens like Petitioner, may be continued beyond the initial ninety days, or the alien may be released. *Id.* § 1231(a)(6); 8 C.F.R. §§ 241.4(a), (d)(1). After ninety days have lapsed, ICE, in its discretion, may release an alien if he shows, to the satisfaction of ICE, that he "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[.]" 8 C.F.R. § 241.4(d)(1).

An alien's custody determination is made by either a district director, *see id.* § 241.4(h), or the Executive Associate Commissioner (EAC) of ICE, *see id.* § 241.4(h). *See also id.* § 241.4(h)(5) (providing delegation authority to directors). If a district director is conducting the custody determination, he must "provide written notice to the [alien] approximately 30 days in advance of the pending records review so that the alien may submit information in writing in support of his or her release." *Id.* § 241.4(h)(2). The "custody review will consist of a review of the alien's records and any written information submitted in English to the district director by or on behalf of the alien." *Id.* § 241.4(h)(1). The director "*may*[,] in his or her discretion[,] schedule a personal or telephonic interview with the alien as part of this custody determination." *Id.* (emphasis added). Once the director makes his decision, he must notify the alien of such decision. *Id.* § 241.4(h)(4).

If an alien is released, he is subject to supervision by the Secretary of Homeland Security. *See* 8 U.S.C. § 1231(a)(3); 8 C.F.R. § 241.5 (specifying conditions of release). An alien's supervised release may be revoked by either the EAC or a district director when, "in the district director's opinion, revocation is in the public interest and circumstances do not reasonably permit referral of the case to the [EAC]." 8 C.F.R. § 241.5(l)(2). In either scenario, the EAC or district director may revoke a release for one of four reasons:

> (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.

An alien subject to ICE's discretionary release revocation will be afforded an "initial informal interview" promptly after return to custody, during which time the alien will be afforded an "opportunity to respond to the reasons for revocation." *Id.* §

241.4(l)(1). ICE will later review an alien's record and schedule a more fulsome, formal interview, "which will ordinarily be expected to occur within approximately three months after release is revoked." *Id.* § 241.4(l)(3). "That custody review will include a final evaluation of any contested facts relevant to the revocation and a determination whether the facts as determined warrant revocation and further denial of release." *Id.*

In making a custody determination, ICE shall consider the ability to obtain a travel document, *i.e.,* a passport, for the alien. 8 C.F.R. § 241.4(g)(3). If, in ICE's judgment, travel documents can be obtained or are forthcoming, "the alien will not be released unless immediate removal is not practicable or in the public interest." *Id.*

III. FACTUAL AND PROCEDURAL HISTORY

Petitioner, a native and citizen of Mali, was admitted to the United States on or about February 18, 2000, on a B-2 nonimmigrant visitor visa. ECF 1 ¶ 13; *see also* Ex. A – Form I-213, Record of Deportable/Inadmissible Alien (dated Mar. 12, 2026). The terms of that nonimmigrant visa permitted Petitioner to remain in the United States for a temporary period not to exceed March 17, 2000 and further prohibited him from working during this period. *See* Ex. A. Nonetheless, Petitioner engaged in unauthorized employment in violation of the terms of his nonimmigrant visa. *Id.* Accordingly, the legacy Immigration and Naturalization Service (INS) placed Petitioner into deportation proceedings under section 237(a)(1)(C)(i) of the INA on or about March 8, 2000. *Id.*

On April 10, 2000, an immigration judge granted Petitioner's request for voluntary departure, with a requirement to depart the United States by May 17, 2000. *Id.* Petitioner did not depart the United States by May 17, 2000, in violation of the order, thus converting the immigration judge's voluntary departure order to a deportation order. *Id.* On May 18, 2000, INS issued a separate Order of Deportation. *See* Ex. E – Form I-213, Record of Deportable/Inadmissible Alien (dated Oct. 1, 2011). Petitioner has remained in the United States since this time with an administratively final order of removal. ECF 1 ¶ 13.

On October 1, 2011, Petitioner was arrested by the Philadelphia Police Department for the offenses of Criminal Solicitation and Prostitution; he was convicted of these charges and sentenced to six months' probation on March 22, 2012. *See* Ex. A. As a result of this criminal activity, ICE detained Petitioner for purposes of effectuating his order of removal. *See id.* At the time of his detention, however, Petitioner claimed he did not have a passport in his possession because "it was being held by a friend . . . at his house." Ex. E. Therefore, ICE could not effectuate Petitioner's removal to Mali at that time and, upon information and belief, released him from custody sometime in 2012. ICE thereafter issued an Order of Supervision on January 31, 2014 setting forth the terms and conditions of Petitioner's earlier release from custody pending issuance of a travel document, *i.e.,* a passport, to facilitate Petitioner's removal to Mali. Ex. A; *see also* Ex. B – Form I-220B, Order of Supervision (dated Jan. 31, 2014)[1].

Since his 2012 release, Petitioner interacted with the criminal justice system multiple times. On January 23, 2014, Petitioner was arrested by the Upper Providence Township Police Department for Theft by Unlawful Taking, Receiving Stolen Property, and False Identification to Law Enforcement; he was convicted of Theft by Unlawful Taking and sentenced to six months' imprisonment on April 28, 2014. Ex. A. Moreover, on February 19, 2014, Petitioner was arrested by the Philadelphia Police Department for the offense of Tampering with Identification and Unsworn Falsification to Authority; he was convicted of both charges and sentenced to two years' probation. *Id.*

On March 12, 2026, Petitioner reported to the ICE, Enforcement and Removal Operations (ERO) Field Office for an appointment mandated by his Order of Supervision. *Id.* At this appointment, ICE served Petitioner with a Notice of Revocation of his release based on a significant likelihood of his removal in the reasonably foreseeable future. *See* Ex. C – Notice of Revocation of Release and Revocation Worksheet (dated Mar. 12, 2026). ICE thereafter issued a Warrant of Removal/Deportation based on his outstanding final order of removal. *See* Ex. D –

[1] Due to time constraints in responding to this Petition, the ICE Form I-220B, Order of Supervision submitted at Exhibit B is from an electronic system and consists of the first page of that Form only. Respondents have requested a copy of the original, complete Form from Petitioner's Administrative File. Respondents have also requested to review Petitioner's Administrative File to clarify the reason for the apparent discrepancy between the date Petitioner signed the Form and the date the Form was issued.

Form I-205, Warrant of Removal/Deportation (dated March 12, 2026). At the time of his arrest, ICE obtained a copy of Petitioner's Malian passport for purposes of effectuating his expeditious removal to Mali. Ex. A.

Despite his final order of removal, Petitioner now challenges ICE's conduct in revoking his release and detaining him to facilitate that removal. ECF 1. However, as demonstrated below, ICE's conduct complied with the INA, applicable regulations at 8 C.F.R. § 241.4, the Fifth Amendment to the U.S. Constitution, and the Administrative Procedures Act. Therefore, the Court should deny the petition for a writ of habeas corpus.

IV. LEGAL STANDARD

A writ of habeas corpus is an "extraordinary remedy." *Shinn v. Ramirez*, 596 U.S. 366, 377 (2022). The petitioner bears the burden of showing his confinement is unlawful. *Hawk v. Olson*, 326 U.S. 271, 279 (1945); *accord Cullen v. Pinholster*, 563 U.S. 170, 181 (2011) (habeas petitioner "carries the burden of proof"); *see also* 28 U.S.C. § 2241.

Judicial review of immigration matters, including of detention issues, is limited. *INS v. Aguirre-Aguirre*, 526 U.S. 415, 425 (1999); *Reno v. Am.-Arab Anti-Discrimination Comm.* (*AADC*), 525 U.S. 471, 489–92 (1999); *Miller v. Albright*, 523 U.S. 420, 434 n.11 (1998); *Fiallo v. Bell*, 430 U.S. 787, 792 (1977); *Reno v. Flores*, 507 U.S. 292, 305 (1993); *Hampton v. Mow Sun Wong*, 426 U.S. 88, 101 n.21 (1976) ("[T]he power over aliens is of a political character and therefore subject only to narrow judicial review."). The Supreme Court has "underscore[d] the limited scope of inquiry into immigration legislation," and "has repeatedly emphasized that over no conceivable subject is the legislative power of Congress more complete than it is over the admission of aliens." *Fiallo*, 430 U.S. at 792 (internal quotation omitted); *Mathews v. Diaz*, 426 U.S. 67, 79–82 (1976); *Galvan v. Press*, 347 U.S. 522, 531 (1954).

The plenary power of Congress and the Executive Branch over immigration necessarily encompasses immigration detention, because the authority to detain is elemental to the authority to deport and because public safety is at stake. *See Shaughnessy v. United States*, 345 U.S. 206, 210 (1953) ("Courts have long recognized the power to expel or exclude aliens as a fundamental sovereign attribute exercised by the Government's political departments largely immune from judicial control."); *Carlson v. Landon*, 342 U.S. 524, 538 (1952) ("Detention is necessarily a part of this deportation procedure."); *Demore v. Kim*, 538 U.S. 510, 531 (2003) ("Detention during removal proceedings is a constitutionally permissible part of that process."); *Jennings v. Rodriguez*, 583 U.S. 281, 286 (2018) ("Congress has authorized immigration officials to detain some classes of aliens during the course of certain immigration proceedings. Detention during those proceedings gives immigration officials time to determine an alien's status without running the risk of the alien's either absconding or engaging in criminal activity before a final decision can be made.").

Petitioner must make a strong showing to demonstrate that his continued detention violates the Constitution or laws of the United States. *See United States* *v. Five Gambling Devices*, 346 U.S. 441, 449 (1953) ("This Court does and should accord a strong presumption of constitutionality to Acts of Congress. This is not a mere polite gesture. It is a deference due to deliberate judgment by constitutional majorities of the two Houses of Congress that an Act is within their delegated power or is necessary and proper to execution of that power").

V. ARGUMENT

The Court should deny the petition because: (1) Petitioner's detention is lawful under 8 U.S.C. § 1231 and the U.S. Supreme Court's holding in *Zadvydas v. Davis*, 533 U.S. 678 (2001); (2) revocation of Petitioner's order of supervision complied with the regulations at 8 C.F.R. § 241.4; and (3) Petitioner's detention comports with the Fifth Amendment's Due Process Clause.

A. Petitioner's detention is lawful under 8 U.S.C. § 1231 and *Zadvydas*

As discussed above, an alien with a final order of removal is subject to the detention and removal standards set forth at 8 U.S.C. § 1231. This statute directs that an alien ordered removed be removed within ninety days of his order becoming final and that he remain detained during that timeframe. 8 U.S.C. § 1231(a)(1)(A), (a)(2)(A). However, if the government is unable to remove an individual during that statutory period, the INA empowers ICE to release him on an order of supervision. 8 U.S.C. § 1231(a)(3).

When removal is not effectuated within the 90-day statutory period, the government may continue to detain an alien—or to detain him again in the future for the purpose of executing the order—and there is no statutory limit on how long that post-removal detention period may last. *Johnson v. Arteaga-Martinez*, 596, U.S. 573, 579 (2022). The U.S. Supreme Court has nevertheless interpreted the post-removal period to allow extended detention for "a period reasonably necessary to bring about that alien's removal from the United States." *Zadvydas*, 533 U.S. at 689. Pursuant to *Zadvydas*, detention for up to six months after the removal order becomes final is "presumptively reasonable." *Id.* at 701. However, the lapse of the presumptive period does not mandate release, as the Supreme Court reasoned that "an alien may be held in confinement until it has been determined that there is no significant likelihood of removal in the reasonably foreseeable future." *Id.*

Here, the immigration judge's order became administratively final on May 18, 2000, after Petitioner failed to depart the United States as required under his grant of voluntary departure.[2] *See* Ex. A. ICE later detained Petitioner for the purposes of effectuating that final order of removal but released him from custody under an Order of Supervision on January 31, 2014. Ex. B. ICE has since determined that it is appropriate to revoke Petitioner's Order of Supervision and detain him for purposes of enforcing his removal order now that Petitioner has a Malian passport and, thus, the means to effectuate his removal from the United State. *See* Exs. A, D. As of the date of this writing, Petitioner has been detained for

[2] The Immigration Judge's April 10, 2000 order granting voluntary departure is the operative date of Petitioner's removal order as reflected on the Form I-220B, Order of Supervision provided at Exhibit B. The May 18, 2000 date listed on the revocation paperwork provided at Exhibit C is the date the voluntary departure order converted to a removal order after Petitioner failed to depart the United States. It is also the date INS issued a separate Order of deportation. *See* Ex. E.

seven days, well-within the "presumptively reasonable" six-month period articulated in *Zadvydas*. Thus, Petitioner's detention is plainly lawful.

However, even if Petitioner had been detained for more than six months, he has not met his burden in demonstrating that there is not a significant likelihood of removal in the foreseeable future. *Zadvydas* makes clear that, after the six-month period of detention, the alien must then provide "good reason to believe that there is no significant likelihood of removal in the foreseeable future," after which time the burden shifts to the government to "furnish evidence sufficient to rebut that showing." *Zadvydas*, 533 U.S. at 680. Petitioner argues that his removal is not reasonably foreseeable but points to no facts within his own case to support this argument. ECF 1 ¶ 29, 76.

Moreover, evidence of record indicates that Petitioner's removal is in fact reasonably foreseeable. Petitioner has a valid Malian passport, in compliance with the conditions of his Order of Supervision, which constitutes the first step in ICE facilitating his removal to Mali. *See* Exs. A; C (providing a condition of Petitioner's release that he assist ICE "in obtaining any necessary travel documents"). Moreover, the Removal and Management Division of ICE Headquarters advised ICE/ERO that a significant likelihood of removal exists in the reasonably foreseeable future for all Malian nationals, like Petitioner, who possess an identity document. Ex. C. Thus, all signs point to ICE preparing to remove Petitioner in the reasonably foreseeable future, and any speculation to the contrary is not ripe for review by this Court only seven days into Petitioner's detention. *See Texas v. United States*, 523 U.S. 296, 300 (1998) ("A claim is not ripe for adjudication if it rests upon 'contingent future events that may not occur as anticipated, or indeed may not occur at all.'"). Accordingly, Petitioner's detention of seven days is lawful under the INA and *Zadvydas*.

B. ICE's revocation of Petitioner's release complies with 8 C.F.R. § 241.4

The revocation of release is also lawful under the regulations at 8 C.F.R. § 241.4, which governs custody determinations for aliens like Petitioner who are inadmissible under 8 U.S.C. § 1182. As discussed above, 8 C.F.R. § 241.4(l) permits ICE to revoke an alien's release under an order of supervision and return the alien to custody in four circumstances: (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; (iv) or the conduct of the alien demonstrates that release is no longer appropriate. 8 C.F.R. § 241.4(l)(2)(i)-(iv). This determination may be made by either the EAC in her discretion or the district director when, "in the district director's opinion, revocation is in the public interest and circumstances do not reasonably permit referral of the case to the [EAC]." *Id.* § 241.4(l)(2).

i. The reasons for revocation are proper under 8 C.F.R. § 241.4

Here, ICE revoked Petitioner's release to enforce his removal order as permitted under 8 C.F.R. § 241.4(l)(2)(iii). The Notice of Revocation, which was served on Petitioner on March 12, 2026 advised Petitioner that ICE revoked his release pursuant to 8 C.F.R. § 241.4(l) because "it is appropriate to enforce the removal order entered against [him] as ICE has the means and ability to effectuate [his] removal. Ex. C. The Notice of Revocation goes on to advise that ICE is seeking a travel document to effect his expeditious removal to Mali. *Id.* Indeed, ICE is now in possession of Petitioner's Malian passport, which will allow them to initiate the process of removing Petitioner to Mali. *See* Exs. A, C. To that end, ICE also issued a Warrant of Removal/Deportation, further evidencing its intent to carry out the removal in the foreseeable future. Ex. D.

Petitioner's Order of Supervision paperwork, which was read and explained to him in the English language, which he signed, and of which he received a copy, further placed Petitioner on notice of his possible removal. *See* Ex. B. The Order of Supervision conditioned Petitioner's release on him assisting ICE "in obtaining any necessary travel documents," and further advised Petitioner that he must appear "in person at the time and place specified, upon each and every request of the agency, for identification *and for deportation or removal.*" *Id.* (emphasis added). Thus, at the time Petitioner signed and received the Order of Supervision, he was on notice of his obligations to assist ICE in obtaining a travel document for the purposes of effectuating his removal, which may occur at a future check-in appointment.

Petitioner nonetheless argues that ICE acted unlawfully in revoking his release because "no change in circumstances warranted the order's revocation." ECF 1 ¶ 43. However, a change in circumstances is not required to revoke release under 8 C.F.R. § 241.4(l)(2). To the contrary, 8 C.F.R. § 241.4(l)(2) permits revocation in four narrow circumstances, including, as here, where it is appropriate to enforce a removal order. *See* 8 C.F.R. § 241.4(l)(2)(i)-(iv). Moreover, even if a change in circumstances was required, the advice from ICE's Removal Management Division regarding the likelihood of Petitioner's removal, coupled with ICE receiving a copy of Petitioner's Malian passport, constitutes a change in circumstances justifying Petitioner's return to custody and release revocation. Therefore, the Court should find that ICE properly revoked Petitioner's release for reasons enumerated in 8 C.F.R. § 241.4(l)(1)-(2).

ii. A Field Office Director has authority to revoke Petitioner's release under 8 C.F.R. § 241.4(l)

The Court should find that a Field Office Director has authority under 8 C.F.R. § 241.4(l)(2) to revoke an Order of Supervision. While the language of 8 C.F.R. § 241.4(l)(2) uses the term "district director," this is the equivalent of a Field Office Director today following the 2003 reorganization of the INS into the Department of Homeland Security. *See* 8 C.F.R. § 1.2 (defining "district director" after March 2003 to mean, among other roles, "field office director."). Prior to reaching the Field Office Director for final decision, however, Petitioner's case was reviewed by a Deportation Officer, a Supervisory Deportation Officer, an Assistant Field Office Director, and a Deputy Field Office Director, all of whom concurred with the decision to revoke Petitioner's release. *See* Ex. C. Subsequent to Petitioner's arrest on December 7, 2025, ICE also contacted the Removal Management Division of ICE Headquarters, which advised ICE/ERO that there exists a significant likelihood of removal in the reasonably foreseeable future given Petitioner is Malian and possesses a Malian passport. *Id.* Thus, the proper authority revoked Petitioner's release following a meaningful review process.

Further, the Field Office Director is permitted to revoke release when *in his opinion*, revocation is in the public interest and referral to the EAC is not reasonable. Here, Petitioner's prior criminal history and immigration violations are documented in detail on the revocation paperwork prepared and signed by the Deportation Officer and his supervisors. *See id*. This paperwork also documents ICE's referral of Petitioner's case to the Removal Management Division of ICE Headquarters for concurrence regarding the possibility of removal in Petitioner's case. *See id.* ICE thereafter issued an administrative warrant for Petitioner's removal, returned Petitioner to custody, and revoked his Order of Supervision. Exs. D-E.

This evidence thus demonstrates that (i) the FOD made a discretionary determination that revocation was in the public interest due to Petitioner's criminal and immigration history; and (ii) that referral to the EAC was not reasonable in light of ICE Headquarters' concurrence regarding the likelihood of his removal in the first instance. *See e.g., Demore v. Kim*, 538 U.S. 510, 518 (analyzing the mandatory detention provisions of INA § 1226(c) and finding that United States has a significant interest in ensuring the removal of criminal aliens); *Ventura v. Att'y Gen.,* 2026 WL 579389, at *2 (3d Cir. Feb. 27, 2026) (denying petitioner's motion for stay of removal, reasoning that the "public interest in the prompt removal of aliens facing final orders of removal cannot be understated”). Therefore, the Court should find that the proper authority revoked release following a proper discretionary assessment.

iii. ICE afforded Petitioner the notice and informal interview required under 8 C.F.R. § 241.4(l)

Petitioner further challenges his revocation because he contends that he was not afforded an informal interview during which he could respond to the reasons for revocation. ECF 1 ¶¶ 32, 49. 8 C.F.R. § 241.4(l)(1) provides that, upon revocation of release, the alien “will be notified of the reasons for revocation of his or her release,” as well as afforded “an informal interview promptly after his or her return to Service custody to afford the alien an opportunity to respond to the reasons for revocation stated in the notice.” After this informal interview, Petitioner will be afforded another, more fulsome opportunity to contest his release, which will include a records review, an interview, and a “final evaluation” of facts relevant to revocation of release. *See id.* § 241.4(1)(3).

Here, Petitioner was advised of the reasons for revocation as required under 8 C.F.R. § 241.4(l)(2) through service of the Notice of Revocation of Release on March 12, 2026. *See* Ex. C. That Notice further advised Petitioner of his right to an informal interview on March 16, 2026, “at which [he] will be given an opportunity to respond to the reasons for this revocation” and “submit any evidence or information [he] wish[es] to be reviewed in support of [his] release.”

Id. That interview occurred as scheduled on March 16, 2026.[3] Petitioner will be afforded another, more fulsome interview to consider his continued detention in no more than three months. 8 C.F.R. § 241.4(l)(3). Thus, ICE properly advised Petitioner of the reasons for revocation, placed him on notice of an upcoming informal interview, and provided him that informal interview within four days of his redetention, thereby providing him adequate opportunity to gather any evidence and information in support of his release. *Cf Mauricio Martinez v. Jamison,* No. 26-cv-00718 (E.D. Pa March 12, 2026) (Kenney, J.) (finding issues with revocation process where there was no evidence that petitioner was afforded the informal interview required under 8 C.F.R. § 241.4(l); *Diaw v. Jamison*, No. 26-cv-00761 (E.D. Pa March 11, 2026) (Murphy, J.) (same).

Thus, contrary to Petitioner's assertions, the record demonstrates that ICE provided Petitioner with notice and a meaningful opportunity to respond to the revocation—precisely what is required by the regulations. Accordingly, ICE has complied with 8 C.F.R § 241.4 and, in turn, did not violate the APA or the *Accardi* doctrine when it revoked Petitioner's order of supervision.

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[3] Respondents intend to submit ICE Form 71-090, entitled "Alien Informal Interview Upon Revocation of Order of Supervision Under 8 C.F.R. § 241.4(l); 8 C.F.R. § 241.13(i)" to corroborate that the informal interview occurred on March 16, 2026. Because this is an internal, deliberative document of ICE, Respondents and Petitioner are discussing filing a Stipulated Protective Order related to this document and the information contained therein.

C. Petitioner's detention comports with constitutional due process

The Supreme Court has already decided what constitutional due process is required under post-order removal cases to avoid violating the rights of an alien like Petitioner. As the Fourth Circuit Court of Appeals explained: "*Zadvydas* largely, if not entirely, forecloses due process challenges to § 1231 detention apart from the framework it established." *Castaneda v. Perry*, 95 F.4th 750, 760 (4th Cir. 2024). In other words, "the *Zadvydas* standard *is* due process: a § 1231 detainee who fails the *Zadvydas* test fails to prove a due process violation." *Id.* (emphasis in the original). The Supreme Court thus determined that the process it articulated for contesting post-removal detention is sufficient to avoid the "serious constitutional concerns" that "indefinite detention" would raise. *Zadvydas*, 533 U.S. at 682. The Third Circuit has recognized, however, that there may come a time when detention in post-order removal cases becomes unreasonable such that a bond hearing is required. *See German Santos v. Warden Pike Cnty. Corr. Facility*, 965 F.3d 203, 211 (3d Cir. 2020) (analyzing detention under § 1226(c) and § 1231(a)).

Here, for many of the same reasons discussed *supra*, Petitioner has not met his burden to establish that the revocation of his release and subsequent detention violates constitutional due process under the Supreme Court's standard in *Zadvydas*. Prior to release from custody, Petitioner signed and acknowledged the conditions of his release, including the need to assist ICE in obtaining a travel document and the possibility of detention and removal in the future. *See* Ex. B. After Petitioner obtained a travel document, ICE detained him and provided timely notice of its reasons for revoking his release, as well as the opportunity to contest this through an informal interview. *See id.* Petitioner will be afforded another, more formal interview in no more than three months. As of the date of this writing, Petitioner has been detained for only seven days, well short of the presumptively reasonable six-month period set forth in *Zadvydas*, and ICE's conduct to date has complied with the INA and accompanying regulations. Therefore, the Court should find that Petitioner's detention comports with constitutional due process.

VI. CONCLUSION

For the foregoing reasons, Respondents respectfully request that the petition for writ of habeas corpus be denied.

Respectfully submitted,

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Dated: March 19, 2026

Counsel for Respondents

CERTIFICATE OF SERVICE

I certify that on this date, I filed the foregoing Response in Opposition to Petition for Writ of Habeas Corpus via the Court's CM/ECF System, thereby making it available for viewing and download for all parties to the case.

Dated: March 19, 2026

/s/ Daniella D. Lees
DANIELLA D. LEES
Special Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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Petitioner,	:	
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JAMAL L. JAMISON, ET AL.,	:	
	:	
Respondents.	:	

Exhibit List

Exhibit A: Form I-213, Record of Deportable/Inadmissible Alien (dated Mar. 12, 2026).

Exhibit B: Form I-220B, Order of Supervision (dated Jan. 31, 2014).

Exhibit C: Notice of Revocation of Release and Revocation Worksheet (dated Mar. 12, 2026).

Exhibit D: Form I-205, Warrant of Removal/Deportation (dated Mar, 12, 2026).

Exhibit E: Form I-213, Record of Deportable/Inadmissible Alien (dated Oct. 1, 2011).

U.S. Department of Homeland Security Subject ID : [redacted]

Record of Deportable/Inadmissible Alien

Family Name (CAPS) / First / Middle	Sex	Hair	Eyes	Cmplxn
DIA, IBRAHIM	M	BLK	BRO	DRK

Country of Citizenship	Passport Number and Country of Issue	File Number	Height	Weight	Occupation
MALI		PHI[redacted]	70	170	laborer

U.S. Address: 555 GEO DR PHILIPSBURG, PENNSYLVANIA, 16866, UNITED STATES

Scars and Marks:

Date, Place, Time, and Manner of Last Entry: 02/18/2000 Unknown Time, JFK, B2-Visitor For Pleasure

Passenger Boarded at:

F.B.I. Number: [redacted]

Single / Divorced / Married / Widower / Separated

Number, Street, City, Province (State) and Country of Permanent Residence:

Method of Location/Apprehension: NCA

Date of Birth	Date of Action	Location Code	At/Near	Date/Hour
[redacted] Age: 57	03/12/2026	PHI/PHI	See I-831	03/12/2026 12:29

City, Province (State) and Country of Birth: MALI

AR ☒ Form : (Type and No.) Lifted ☐ Not Lifted ☐

By: THOMAS ROMAINE

NIV Issuing Post and NIV Number:

Social Security Account Name:

Status at Entry:

Status When Found:

Date Visa Issued:

Social Security Number:

Length of Time Illegally in U.S.:

Immigration Record: NEGATIVE

Criminal Record: See Narrative

Name , Address, and Nationality of Spouse (Maiden Name, if Appropriate):

Number and Nationality of Minor Children: None

Father's Name, Nationality, and Address, if Known: DIA, MAMADOU NATIONALITY: MALI

Mother's Present and Maiden Names, Nationality, and Address, if Known: DIAKITE, ADAM NATIONALITY: MALI

Monies Due/Property in U.S. Not in Immediate Possession: None Claimed

Fingerprinted? Yes No

Systems Checks:

Charge Code Words(s): See Narrative

Name and Address of (Last)(Current) U.S. Employer:

Type of Employment: Unemployed or Retired

Salary: Hr

Employed from/to:

Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)

[redacted]

Left Index fingerprint   Right Index fingerprint

FAMILY INFORMATION

Father:DIA, MAMADOU is a citizen of MALI.
Mother:DIAKITE, ADAM is a citizen of MALI.
Spouse:Subject is not married.
Child:Subject does not have children or dependents.

OTHER ALIASES KNOWN BY:

SEYDOU, SOUMANO ...(CONTINUED ON I-831)

THOMAS ROMAINE
Deportation Officer

Alien has been advised of communication privileges ____________ (Date/Initials) (Signature and Title of Immigration Officer)

Distribution:

Received: (Subject and Documents) (Report of Interview)

Officer: THOMAS ROMAINE

on: March 12, 2026 (time)

Disposition: Other

Examining Officer: DEMURGUIONDO, ASD8132

Form I-213 (Rev. 08/01/07)

U.S. Department of Homeland Security — Continuation Page for Form I-213

Alien's Name	File Number	Date
DIA, IBRAHIM	[redacted] Event No: PHI[redacted]	03/12/2026

SUBJECT HEALTH STATUS

Diabetes type 2, Hypertension, Dyslipidemia

CURRENT ADMINISTRATIVE CHARGES

03/12/2026 - 237a1Ci - NONIMMIGRANT WITH UNAUTHORIZED EMPLOYMENT

ARRESTED AT/NEAR

[redacted] UNITED STATES

RECORD OF DEPORTABLE/EXCLUDABLE ALIEN:

Ibrihim DIA is subject to President Donald Trump's Executive Order, titled "Protecting the American People Against Invasion," signed on January 20, 2025.

Encounter:
On March 12th, 2026, DIA, Ibrahim [redacted] a native and citizen of Mali reported to the Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) Philadelphia Field Office for his scheduled check-in appointment. The Philadelphia Non-Detained Unit confirmed DIA 's identity, alienage, and removability and served him with a Warrant of Arrest form I-205 and Notice of Revocation of Release letter.

Alienage & Removability:
DIA is a citizen of Mali and a national of Mali by virtue of birth, who entered the United States illegally without being admitted or paroled by an immigration officer. Numerous checks using databases with the Department of Homeland Security (DHS) and the Department of Justice (DOJ) show no pending appeals, applications, petitions or waivers.

On November 15th, 2004, DIA submitted form I-687 Application for Status that was ultimately denied.

Family/ Derivative Citizenship:
DIA has not asserted any claim to United States citizenship, nor do any records indicate that he has obtained or derived such citizenship.

Immigration History:
On February 18th, 2000, INS admitted DIA into the United States at or near New York City, as a Non-immigrant as a B-2 visitor with authorization to remain in the United States until March 17, 2000.
On March 8th, 2000, INS encountered DIA engaging in unauthorized employment. INS took the subject into custody and transported him to the Philadelphia District Office for processing. INS served DIA with an I-862 notice to appear charging him under section 237a1Ci (Nonimmigrant with Unauthorized Employment) of the INA. INS transferred him to the Berks County Jail.
On April 10th, 2000, and Immigration Judge granted DIA Voluntary Departure, and he was ordered to depart no later than May 17th, 2000. DIA bonded out of INS custody the same day.
On May 18th, 2000, DIA failed to depart the United States and his Order of Removal became final.
On October 3rd, 2011, INS encountered DIA at the Philadelphia Detention Unit. INS transferred DIA to York County Jail.
On February 22nd, 2012, INS released DIA from custody on an Order of Supervision pending issuance of travel documents.

Signature	Title
THOMAS ROMAINE	Deportation Officer

U.S. Department of Homeland Security **Continuation Page for Form** I-213

Alien's Name	File Number	Date
DIA, IBRAHIM	[redacted] Event No: PHI[redacted]	03/12/2026

On January 31st, 2014, DIA was booked into the Philadelphia District Office and released that day on an Order of Supervision pending issuance of travel document.
Criminal History:
On October 1st, 2011, the Philadelphia Police Department (PPD) arrested DIA and charged him with Prostitution and Related Offense. On March 22, 2012, the Philadelphia Court convicted DIA and sentenced him to 6 months' probation.
On January 23rd, 2014, the Upper Providence Township Police Department arrested DIA and charged him with Theft by Unlawful Taking. On April 28th, 2014, the Upper Providence Township court convicted DIA and sentenced him to 6 months prison.
On February 19th, 2014, the PPD arrested DIA and Charged him with Tampering with Identification and Unsworn Falsification to Authority. On April 29th, 2015, the Philadelphia Court convicted DIA and sentenced him to 2 years' probation.
Health & Humanitarian:
DIA denied any significant humanitarian concerns.
DIA made a 5-minute phone call to his wife [redacted]
DIA declined his right to speak with the Mali Consulate. Consular notifications are not mandatory.
DIA has not claimed fear of removal to Mali.
DIA claims to have Diabetes type 2, Hypertension, and Dyslipidemia. He claims to take Metformin and Losartan.

DIA claims to be Married.
DIA claims to have four children under the care of his wife.
DIA stated that he did not serve in the United States Military.

Foreign Identity and Travel Documents:
At the time of arrest, ERO was able to obtain a copy of DIA 's foreign identity/travel document.
Mali Passport [redacted]

Disposition:
ICE served him with a Warrant of Arrest Form I-205 and an Order of Supervision Revocation Letter. All forms were explained to him in English. Subject's I-205 and Order of Supervision Revocation Letter were uploaded to the EARM documents tab.

OTHER IDENTIFYING NUMBERS

ALIEN-[redacted]6
State Criminal Number/State Bureau Number-[redacted] (UNITED STATES)
Other Biometric-[redacted]
..COMMENT: FINS
U.S. Social Security Number-[redacted]

Signature	Title
THOMAS ROMAINE	Deportation Officer

1023014177930 1906228 205028 12 0752422 021323 13:36 021023 ADS_ELIS-805887

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF SUPERVISION

File No: [redacted]

Date: 1/31/14

Name: DIA, Ibrahim

On 4/10/2000 (Date of Final Order), you were ordered:

☐ Excluded or deported pursuant to proceedings commenced prior to April 1, 1997.

☒ Removed pursuant to proceedings commenced on or after April 1, 1997.

Because the agency has not effected your deportation or removal during the period prescribed by law, it is ordered that you be placed under supervision and permitted to be at large under the following conditions:

☒ That you appear in person at the time and place specified, upon each and every request of the agency, for identification and for deportation or removal.

☒ That upon request of the agency, you appear for medical or psychiatric examination at the expense of the United States Government.

☒ That you provide information under oath about your nationality, circumstances, habits, associations and activities and such other information as the agency considers appropriate.

☒ That you do not travel outside PA (Specify geographic limits, if any) for more than 48 hours without first having notified this agency office of the dates and places, and obtaining approval from this agency office of such proposed travel.

☒ That you furnish written notice to this agency office of any change of residence or employment 48 hours prior to such change.

☒ That you report in person on ______ (Day/Date/Time) to this agency office at:
1600 Callowhill Street, Philadelphia, PA 19130 215-656-7164
(Reporting Address)

☒ That you assist U.S. Immigration and Customs Enforcement in obtaining any necessary travel documents.

☐ Other: ______

☒ See attached sheet containing other specified conditions (Continue on separate sheet if required)

Thomas Decker
(Signature of ICE Official)

Thomas Decker (Field Office Director)
(Print Name and Title of ICE Official)

Alien's Acknowledgement of Conditions of Release under an Order of Supervision

I hereby acknowledge that I have (read) (had interpreted and explained to me in the English language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.

(Signature of ICE Official Serving Order)

X Ibrahim Dia
(Signature of Alien)

11/15/2012
Date

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

NOTICE OF REVOCATION OF RELEASE

Alien Name: Ibrahim DIA A- File # [redacted]

Your release on the order of supervision (OSUP) issued to you on or about 01/31/2014 (Date OSUP Issued (MM/DD/YYYY)) is hereby revoked. You will remain detained in U.S. Immigration and Customs Enforcement (ICE) custody at this time.

☒ Your release has been revoked pursuant to 8 C.F.R. § 241.4(l), for the following reason(s):

- ☐ The purposes of release have been served.
- ☐ You violated a condition of your release. Specifically, you:
  (Information about how condition of release violated)
- ☒ It is appropriate to enforce the removal order entered against you as ICE has the ability and means to effectuate your removal.
  - ☐ ICE has obtained a travel document and scheduled your removal to take place no later than: ________ Date (MM/DD/YYYY)
  - ☒ ICE is seeking a travel document to effect your expeditious removal to Mali (Country of Removal)
  - ☐ On 05/18/2000 (Date (MM/DD/YYYY)), you were ordered removed to Mali (Country), but you were granted withholding of removal to Not Applicable (Country). Your case is under review for removal to an alternate country.
- ☐ Your conduct, or other circumstance, indicates that release is no longer appropriate. Specifically, you:
  (Information about why release no longer appropriate)

OR

☐ Your release has been revoked pursuant to 8 C.F.R. § 241.13(i), for the following reason(s):

- ☐ You violated a condition of your release. Specifically, you:
  (Information about how condition of release violated)
- ☐ Circumstances have changed such that there is a significant likelihood of removal in the reasonably foreseeable future.
  - ☐ ICE has obtained a travel document and scheduled your removal to take place no later than: ________ Date (MM/DD/YYYY)

☐ ICE is seeking a travel document to effect your expeditious removal to ____________
Country of Removal

☐ On ____________ , you were ordered removed to ____________ , but you
Date (MM/DD/YYYY) Country

were granted withholding of removal to ____________ . Your case is under review
Country

for removal to an alternate country.

Notice of Informal Interview

On 03/16/2026 , you will be afforded an informal interview at which you will be given an opportunity to
Date (MM/DD/YYYY)

respond to the reasons for this revocation. You may submit any evidence or information you wish to be reviewed in support of your release.

Penalties for Failure to Comply with Order of Removal

You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 U.S.C. § 1253(a) and civil penalties under 8 U.S.C. § 1324d.

John Rife
Signature of Authorized Official

03/12/2026
Date (MM/DD/YYYY)

John Rife
Name of Authorized Official

Acting Field Office Director
Title of Authorized Official

(Note: 8 C.F.R. § 241.4 revocation must be EAD or FOD where there is a public interest to do so and referral to EAD not reasonable; 241.13 may be by RMD)

PROOF OF SERVICE

(1) Personal Service

(a) I THOMAS ROMAINE , D.O. ,
Name of ICE Officer Title

certify that I served DIA, IBRAHIM with a copy of this document at
Name of detainee

PHILADELPHIA on 03/12/2026, at 1600 .
Institution Date (MM/DD/YYYY) Time

REFUSE TO SIGN 3/12/26
Detainee Signature Date (MM/DD/YYYY)

☐ cc: Attorney of Record or Designated Representative

☐ cc: A-File

OSUP Revocation Worksheet

Alien Name: DIA, Ibrahim **A-number:** [redacted]

Reason for revocation: OSUP Violator ☐ **SLRRFF** ☑

Is this a Headquarters release? Yes ☐ No ☑

If Headquarters release, was approval of OSUP revocation received? Yes ☐ No ☐ N/A ☑

- **List OSUP violations and/or events that led to SLRRFF:**
  Per ICE Removal and Management Division SLRRFF is established for all citizens of Mali with an identity document. Copy of subject's Mali Passport is in file.

- **Brief case summary and officer's recommendation:**
  Ibrahim DIA is a citizen of Mali and a national of Mali by virtue of birth.
  On February 18th, 2000, INS admitted DIA into the United States at or near New York City, as a Non-immigrant as a B-2 visitor with authorization to remain in the United States until March 17, 2000.
  On March 8th, 2000, INS encountered DIA engaging in unauthorized employment. INS took the subject into custody and transported him to the Philadelphia District Office for processing. INS served DIA with an I-862, notice to appear charging him under section 237a1Ci (Nonimmigrant with Unauthorized Employment) of the INA. INS transferred him to the Berks County Jail.
  On April 10th, 2000, and Immigration Judge granted DIA Voluntary Departure, and he was ordered to depart no later than May 17th, 2000. DIA bonded out of INS custody the same day.
  On May 18th, 2000, DIA failed to depart the United States and his Order of Removal became final.
  On November 15th, 2004, DIA submitted form I-687 Application for Status that was ultimately denied.
  On October 1st, 2011, the Philadelphia Police Department (PPD) arrested DIA and charged him with Prostitution and Related Offense. On March 22, 2012, the Philadelphia Court convicted DIA and sentenced him to 6 months' probation.
  On October 3rd, 2011, INS encountered DIA at the Philadelphia Detention Unit. INS transferred DIA to the York County Jail.
  On February 22nd, 2012, INS released DIA from custody on an Order of Supervision pending issuance of travel documents.
  On January 31st, 2014, DIA was booked into the Philadelphia District Office and released that day on an Order of Supervision pending issuance of travel document.
  On January 23rd, 2014, the Upper Providence Township Police Department arrested DIA and charged him with Theft by Unlawful Taking. On April 28th, 2014, the Upper Providence Township court convicted DIA and sentenced him to 6 months prison.
  On February 19th, 2014, the PPD arrested DIA and Charged him with Tampering with Identification and Unsworn Falsification to Authority. On April 29th, 2015, the Philadelphia Court convicted DIA and sentenced him to 2 years probation.

Preparing Officer

Thomas Romaine	THOMAS E ROMAINE Digitally signed by THOMAS E ROMAINE Date: 2026.03.12 14:34:07 -04'00'	03/12/1990
(Name)	(Signature)	(Date)

Alien Name: DIA, Ibrahim [redacted]

Supervisory Officer's Recommendation: Concur ☑ Do Not Concur ☐

SDDO's Notes: The subject is a criminal final order with no applicatons, appeals, peitions or waivers pending. RMD stated that SLRRFF exists for citizens with identity documents. I recommend taking him into custody

Alano deMurguiondo	ASD 8132 Digitally signed by ASD 8132 Date: 2026.03.12 14:37:25 -04'00'	03/12/2026
(Name)	(Signature)	(Date)

Assistant Field Office Director's Recommendation: Concur ☑ Do Not Concur ☐

AFOD's Notes: Subject has diabetes but has medication. Subject's children are with their mother. Criminal convicitions and SLRRFF exists.

Joseph Roache	JOSEPH J ROACHE Digitally signed by JOSEPH J ROACHE Date: 2026.03.12 14:50:17 -04'00'	03/12/2026
(Name)	(Signature)	(Date)

Deputy Field Office Director's Decision: Concur ☑ Do Not Concur ☐

DFOD's Notes: Subject is a Final Order with convictions. SLRRFF exists as subject has identity documents. Subject's diabetic with medication. Children are with their mother. Subject should be taken into custody.

Elizabeth Cox	ELIZABETH L COX Digitally signed by ELIZABETH L COX Date: 2026.03.12 15:05:35 -04'00'	03/12/2026
(Name)	(Signature)	(Date)

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

WARRANT OF REMOVAL/DEPORTATION

Subject ID: [redacted]
File No: [redacted]
Event No: PH[redacted]
Date: March 12, 2026

To any immigration officer of the United States Department of Homeland Security:

IBRAHIM DIA AKA: SEYDOU, SOUMANO
(Full name of alien)

who entered the United States at New York City, New York (Place of entry) on February 18, 2000 (Date of entry)

is subject to removal/deportation from the United States, based upon a final order by:

- [x] an immigration judge in exclusion, deportation, or removal proceedings
- [ ] a designated official
- [ ] the Board of Immigration Appeals
- [ ] a United States District or Magistrate Court Judge

and pursuant to the following provisions of the Immigration and Nationality Act:
237a1Ci;

I, the undersigned officer of the United States, by virtue of the power and authority vested in the Secretary of Homeland Security under the laws of the United States and by his or her direction, command you to take into custody and remove from the United States the above-named alien, pursuant to law, at the expense of:

(Signature of immigration officer)

PSD 8132 SPDO
(Title of immigration officer)

March 12, 2026, Philadelphia, PA
(Date and office location)

Alien No: [redacted]

To be completed by immigration officer executing the warrant: Name of alien being removed:

IBRAHIM DIA

Port, date, and manner of removal:

Photograph of alien removed

Right index fingerprint of alien removed

(Signature of alien being fingerprinted)

(Signature and title of immigration officer taking print)

Departure witnessed by:

(Signature and title of immigration officer)

If actual departure is not witnessed, fully identify source or means of verification of departure:

If self-removal (self-deportation), pursuant to 8 CFR 241.7, check here. ☐

Departure Verified by:

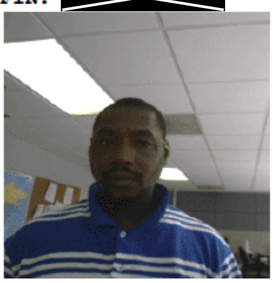
(Signature and title of immigration officer)

U.S. Department of Homeland Security   Subject ID : [redacted]   **Record of Deportable/Inadmissible Alien**

Family Name (CAPS) First Middle DIA, IBRAHIM		Sex M	Hair BLK
Eyes BRO	Cmplxn DRK		
Country of Citizenship MALI	Passport Number and Country of Issue	File Number PHI[redacted]	Height 70
Weight 170	Occupation		
U.S. Address		Scars and Marks See Narrative	
Date, Place, Time, and Manner of Last Entry 05/30/1992 Unknown Time, UNK, b2	Passenger Boarded at	F.B.I. Number [redacted]	☒ Single ☐ Divorced ☐ Married ☐ Widower ☐ Separated
Number, Street, City, Province (State) and Country of Permanent Residence		Method of Location/Apprehension CLC	
Date of Birth [redacted] Age: 43	Date of Action 10/01/2011	Location Code PHI/PHI	At/Near , , , ,
Date/Hour 10/01/2011 00:00			
City, Province (State) and Country of Birth MALI	AR ☒	Form : (Type and No.) Lifted ☐ Not Lifted ☐	By C 7961 MEDINA
NIV Issuing Post and NIV Number	Social Security Account Name	Status at Entry	Status When Found
Date Visa Issued	Social Security Number	Length of Time Illegally in U.S.	
Immigration Record POSITIVE - See Narrative	Criminal Record See Narrative		
Name , Address, and Nationality of Spouse (Maiden Name, if Appropriate)		Number and Nationality of Minor Children None	
Father's Name, Nationality, and Address, if Known DIA, MAMADOU NATIONALITY: MALI	Mother's Present and Maiden Names, Nationality, and Address, if Known DIAKITE, ADAM NATIONALITY: MALI		
Monies Due/Property in U.S. Not in Immediate Possession None Claimed	Fingerprinted? ☒ Yes ☐ No	Systems Checks See Narrative	Charge Code Words(s) See Narrative
Name and Address of (Last)(Current) U.S. Employer	Type of Employment	Salary Hr	Employed from/to

Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)

FIN: [redacted]   Left Index fingerprint   Right Index fingerprint



FAMILY INFORMATION

Father:DIA, MAMADOU is a citizen of MALI.
Mother:DIAKITE, ADAM is a citizen of MALI.
Spouse:Subject is not married.
Child:Subject does not have children or dependents.

OTHER ALIASES KNOWN BY:

SEYDOU, SOUMANO ...(CONTINUED ON I-831)

C 7961 MEDINA
Deportation Officer
(Signature and Title of Immigration Officer)

Alien has been advised of communication privileges ____________ (Date/Initials)

Distribution:

Received: (Subject and Documents) (Report of Interview)

Officer: C 7961 MEDINA

on: October 1, 2011 (time)

Disposition: Bag and Baggage

Examining Officer: NEWNOM, E 0492

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name	File Number	Date
DIA, IBRAHIM	[redacted] Event No: PHI[redacted]	10/01/2011

SCARS MARKS AND TATTOOS

None Indicated - None IndicatedNone Visible - None Visible

IMMIGRATION RECORD

History was expected but not provided

SUBJECT HEALTH STATUS

Subject Claims Good health

CURRENT CRIMINAL CHARGES

10/03/2011 - 8 USC 1227 - DEPORTABLE ALIEN

RECORDS CHECKED

IAFIS checked on 10/01/2011 with Positive result.NCIC checked on 10/01/2011 with Positive result.

RECORD OF DEPORTABLE/EXCLUDABLE ALIEN:

Dia, Ibrahim [redacted] hereafter referred to as the subject was encountered by Immigration Enforcement Agent Kane at the Philadelphia Detention Center October 1, 2010. IEA Kane became aware of the subjects arrest after receiving a Secure Communities referral from the Philadelphia Police Dept. The subject was arrested by the Philadelphia Police Dept. for Criminal Solicitation and Prostitution. The subject was interviewed and a record of sworn statement was completed.

The subject makes no claims to being a United States Citizen. The subject claims to be a native of Mali and a citizen of Mali by virtue of birth.
Record check indicate subject last entered the United States at or near New York City, NY on or about February 18 2000, as an Non-immigrant as a B-2 visitor with authorization to remain in the United States until March 17, 2000. Subject claims he entered sometime in February 2000 on a tourist visa.

A biometric and biographic search of ICE indices using the subjects fingerprints and identifiers yielded one prior encounters by the Philadelphia INS on 3/8/2000; subject was served WA/NTA. Subject was then ordered removed by the IJ on 04/10/2000.

The subject was on 4/10/00 granted Voluntary Departure until May 17, 2000. On May 18th 2000 an order of Deportation was issue by a district Director.

A search in CLAIMS yields no pending petition for the subject based on her given name or Alien Number.

The subject has not served in the United States military.

The subject claims to be single and have no children.

The subject claims to be in good medical condition.

The subject claims to have fear of persecution or torture should he be removed from the United States because he stated he owes money to the person who sent him to this country.

Signature	Title
C 7961 MEDINA	Deportation Officer

U.S. Department of Homeland Security **Continuation Page for Form** I-213

Alien's Name	File Number	Date
DIA, IBRAHIM	[redacted] Event No: PHI[redacted]	10/01/2011

MISC INFO:
Subject claims his passport is being held by a friend [redacted] at his house. Sometime after being ordered deported, subject claims he assumed the identity and name of his friend, [redacted] (DOB [redacted] subject claims his friend departed to the Ivory Coast around the time he was ordered Deported.
An Immigration Detainer was lodged with the Philadelphia Detention Center on 10/01/2011

CRIMINAL HISTORY:
Subject was arrested on 10/1/11 by the Philadelphia PD for the following:

CHARGE 1- Criminal Solicitation
CHARGE 2- Prostitution & Related Offenses

DISPOSITION: Guilty and sentenced to 6 months of probation for both charges on 03/22/2012.

This subject was arrested in Delaware County, PA on 01/23/2014 for the following violations:

CHARGE 1- Theft By Unlawful taking
CHARGE 2- Receiving stolen Property
CHARGE 3- False Ident To Law Enforcement

DISPOSITIONS: Pending

MISC Numbers
FBI: [redacted]
SID PA[redacted]

OTHER IDENTIFYING NUMBERS

ALIEN-[redacted]
State Criminal Number/State Bureau Number-[redacted]
Other Biometric-[redacted]
..COMMENT: FINS
U.S. Social Security Number-[redacted]

Signature	Title
C 7961 MEDINA	Deportation Officer