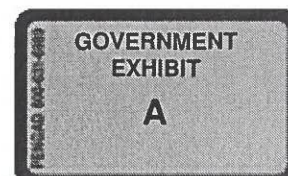


UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

DECLARATION OF ASSISTANT FIELD OFFICE DIRECTOR
ROBERT M. AINLEY

- I, Robert M. Ainley, hereby declare that, to the best of my knowledge, information, and belief, and under the penalty of perjury, the following is true and correct:
1. I am employed by U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), and currently serve as Assistant Field Office Director. I have held this position since June 16, 2024. I have been employed by ICE since 2016.
 2. In my current position, I manage several aspects of the immigration enforcement process, including the identification and arrest, transportation, detention, case management, and removal of noncitizens. In this capacity, I manage ERO personnel and provide oversight over a number of detention facilities within the New Orleans Field Office, including the Winn Correctional Center.
 3. I have prepared this declaration at the request of the U.S. Department of Justice, the United States Attorney's Office, District of Louisiana, in connection with a petition for a writ of habeas corpus filed by (herein referred to as "Petitioner"), who has been assigned the alien registration number Abdikalik Mohamed Ali AXXX-XXX-676. I make this declaration based on my review of DHS electronic databases and documents contained in the alien administrative file (Alien File) pertaining to Petitioner.
 4. Petitioner is a native and citizen of Ethiopia, who was encountered by U.S Customs and Border Protection (CBP at San Ysidro Port of Entry on March 16, 2023. U.S Customs and Border Protection (CBP) processed him as an expedited removal in Section 235(b)(1) of the Immigration Nationality Act (INA). On March 21, 2023, Petitioner was transferred to ICE custody in Adams County Detention Center, Natchez, Mississippi. On March 25, 2023, Petitioner was transferred to River Correctional Center in Ferriday, Louisiana. The Petitioner was transferred to Winn Correctional Center in Winnfield, Louisiana. On March 22, 2023, Petitioner was referred to U.S. Citizenship and Immigration Services (USCIS) after claiming a fear of returning to Ethiopia. On April 17, 2023, USCIS determined Petitioner to have a positive credible fear. On April 17, 2023, DHS issued the Petitioner an NTA, placing him in removal proceedings charging him as removable under INA § 212(a)(7)(A)(i)(I) for failure to possess a valid immigrant visa, border crossing identification card, or reentry permit.
 5. On July 17, 2023, ICE reviewed Petitioner's file and declined to parole him from custody pursuant to INA § 212(d)(5) because he was determined to be a flight risk.

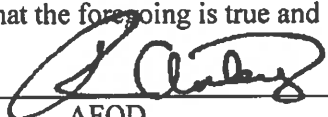


6. On March 2, 2024, Petitioner received a final order of removal to Ethiopia.
7. On March 26, 2024, Petitioner requested to be removed to Somalia because he claimed to be a native and citizen of Somalia. Petitioner completed travel documents for Somalia
8. On April 21, 2024, the travel documents application was completed by Petitioner for Somalia. However, Petitioner refused to complete travel documents application for Ethiopia.
9. On May 28, 2024, ICE conducted a Post Order Custody Review process for Petitioner.
10. On May 31, 2024, Headquarter RIO, determined that Petitioner's Somalia documents were fraudulent and Petitioner had no ties to the country.
11. On June 6, 2024, Petitioner refused to complete the travel documents application. ICE requested travel documents from Ethiopian Consulate. Petitioner refused to comply with Ethiopian Consulate interview on August 9, 2024.
12. On September 5, 2024, Petitioner filed for Temporary Protected Status (TPS) in Somalia with U.S. Citizenship and Immigration Services (USCIS).
13. Removal to Ethiopia was scheduled for November 12, 2024. However, Petitioner could not be removed until TPS was adjudicated.
14. On September 14, 2024, ICE re-reviewed Petitioners' file and again declined to parole her from custody pursuant to INA § 212(d)(5) because he was determined to be a flight risk.
15. On October 18, 2024, a Notice of Intent to deny Temporary Protected Status (TPS) was issued to the Petitioner. The petitioner was given thirty days to appeal USCIS decision.
16. On October 23, 2024, ICE re-reviewed Petitioners' file and again declined to parole him from custody pursuant to INA § 212(d)(5) because he was determined to be a flight risk.
17. On December 8, 2024, ICE re-reviewed Petitioners' file and again declined to parole him from custody pursuant to INA § 212(d)(5) because he was determined to be a flight risk
18. ICE requested travel documents on February 13, 2025. On March 8, 2025, ICE re-reviewed Petitioners' file and again declined to parole him from custody pursuant to INA § 212(d)(5) because he was determined to be a flight risk.
19. Ethiopia issued second travel document on March 21, 2025. Removal to Ethiopia was scheduled for May 12, 2025.
20. On May 12, 2025, while boarding the airplane, Petitioner became combative with ICE officers and refused to comply.

21. Petitioner's removal date has been rescheduled, and it is anticipated that he will be removed from the United States within the next 30 days.

I declare under penalty of perjury that the foregoing is true and correct.

7/11/2025
Executed on this Date


AFOD