

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

ALEX VINCENT KROMAH) **CIVIL ACTION NO: 25-cv-00488**
#A [REDACTED]) **SECTION: P**
VERSUS) **JUDGE JOSEPH**
US IMMIGRATION & CUSTOMS) **MAGISTRATE JUDGE AYO**
ENFORCEMENT, ET AL.)

**ANSWER TO PETITION
FOR WRIT OF *HABEAS CORPUS***

NOW INTO COURT comes Alexander C. Van Hook, Acting United States Attorney for the Western District of Louisiana, and Kristen H. Bayard, Assistant United States Attorney, who on behalf of the named Respondent, U.S. Immigration and Customs Enforcement (ICE),¹ in response to the petition for writ of *habeas corpus* filed by the Petitioner, Alex Vincent Kromah, do hereby allege and aver as follows:

ADMITTED FACTS

Those facts set forth within the Memorandum of Law, filed contemporaneously with this Answer, are incorporated and alleged herein by reference.

¹ While undersigned counsel is only authorized to represent ICE in this matter, all allegations in the petition are being addressed by ICE's response, and therefore the petition should be dismissed in its entirety.

FIRST DEFENSE

The jurisdiction of this Court extends solely to Petitioner's pure claim relating to his continued detention by United States Immigration and Customs Enforcement.

SECOND DEFENSE

Petitioner has failed to state a claim upon which relief can be granted. Alternatively, Petitioner has failed to establish that there is no significant likelihood of his removal in the reasonably foreseeable future.

THIRD DEFENSE

Alex Vincent Kromah is a native of Ghana and citizen of Liberia who, on September 20, 2024, was ordered removed from the United States of America to Ghana or, in the alternative, Liberia.² On February 18, 2025, the Government of Liberia issued Petitioner a Travel Document from its Embassy in Washington, DC, which expires February 18, 2026.³ Therefore, ICE believes there is a significant likelihood of removal in the reasonably foreseeable future.⁴

FOURTH DEFENSE

The continued detention of Alex Vincent Kromah pending his removal from the United States of America comports with all statutory and regulatory provisions governing the detention of aliens pending removal of such aliens from the United States of America.

² See Declaration of Christopher Rodriguez submitted as Government Exhibit A, Nos. 3 & 10.

³ Government Exhibit A, No. 15.

⁴ Government Exhibit A, No. 17.

FIFTH DEFENSE

All allegations of fact not otherwise admitted to or conceded within this answer or the attached Memorandum of Law in support of this answer are denied.

WHEREFORE, it is prayed that this answer to petition for a writ of *habeas corpus* filed by Alex Vincent Kromah be deemed sufficient and, after due proceedings are had and for the reasons set forth within the Memorandum of Law filed with this answer, the petition be denied and dismissed with prejudice. It is further prayed that all legal and equitable relief that the named Respondent may otherwise be entitled to issue forthwith.

Respectfully submitted,

ALEXANDER C. VAN HOOK
ACTING UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of July, 2025, a copy of the foregoing Answer to Petition for Writ of *Habeas Corpus* and supporting Memorandum of Law were electronically filed with the Clerk of Court using the CM/ECF system. I also certify that a copy of this Answer to Petition and accompanying Memorandum of Law will be mailed by United States Postal Service to Petitioner at the following address provided by the Court:

Alex Vincent Kromah
A# 
Pine Prairie ICE Processing Center
1133 Hampton Dupre Road
Pine Prairie, LA 70576

s/ Kristen H. Bayard
KRISTEN H. BAYARD (#32499)
Assistant United States Attorney