

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

FILED JUN 25 08:08
MGA-CL

Samuel Frimmbong Adusah)
Petitioner)

Case No. 4:25-cv-129-CDL
AGH
28 U.S.C. § 2241

v.

Pam Bondi, et al.
Respondents.)

Brief In Opposition to the Motion
to DISMISS

On April 30th 2025, Petitioner was Transferred from Stewart Detention Center to field Office "F.B.O.P." Deportation officer Giovanni And Two other Deportation officer advised Petitioner that Petitioner got a flight Which is Leaving to Ghana. at 11 AM.

On the same day, petitioner asked the Deportation officer if they had petition Traveling Documents, if so. Petitioner need to see. Then the deportation officer Showed Petitioner a travel document with the wrong Date of Birt on there. The Information on the travel document was

Frimpon which is petitioner Middle name Spelled wrong, then petitioner date of Birth On there was [REDACTED] which is also Wrong. Petitioner then advised the deportation officer about the information on the travel Document was not the petitioner right Information is [REDACTED] which is Right date of birth and My Middle Name is Spelled frimmbong. The deportation officer Giovanni and the other two officer told petitioner they don't care about the information on petitioner travel Document and that is not on ICE it's on Petitioner Ghanaian Consulate. Petitioner asked ~~its~~ to speak to his Ghanaian Consulate and ICE Deportation officer said NO. Then they took petitioner to the Airport to Deport petitioner to Ghana. At the airport petitioner watched the "ICE" deportation officer go into the Air plane for about 5 to 10 Mins then Came back down and had a white Document in their hand. The ICE officer then told petitioner that it's fixed. So petitioner advised the ICE officer "Deportation officer" that they Can't change NO Information on petitioner traveling Document, The only person who can

(2)

Change it is petitioner Ghanaian Consulate. The officer then asked the petitioner if they were to get everything corrected would petitioner then leave. Petitioner has always complied since 2010, so petitioner advised that he would leave from there they took petitioner back to the field office, then to the Federal Bureau of Prisons F.B.O.P.

Petitioner was at F.B.O.P. without petitioner mental health care, petitioner been diagnosed with severe disorder, PTSD Disorder, Anxiety disorder, Depressive disorder and has struggled with suicidal ideations and attempts throughout his adult life. Petitioner previously been diagnosed with Schizophrenia and other mood disorder. All of this disorders really stem from a traumatic life. Petitioner showing severe symptoms of mental illness with hallucination, delusions, hearing voices. Petitioner trauma and also searching for any way to mediate the trauma petitioner had gone through and trying to find belonging. Petitioner experiencing trauma when in prison. Petitioner was stab about 15 times by two inmates which cause him to have PTSD having disturbing memories and Night Mares

(3)

feeling and acting like the trauma
 is happening again (Flashback) Becoming
 very upset when reminded of the trauma
 for years. Petitioner could barely sleep
 and when petitioner did had visions
 of his two friend death and father
 and what happen to him in prison.
 During all this time, petitioner had
 Multiple suicide attempts in prison and
 Also believing now here was safe
 and detention staff were out to get
 petitioner and prison staff as well.
 Petitioner also was believing his food
 was poisoned and some one was tryin
 to kill petitioner. Petitioner fear to
 eat the food prison or detention provided
~~XXXXXX~~ petitioner ultimately turned to
 Opiates to numb himself to try to turn
 off the trauma and pain in his ~~mind~~
 Petitioner had a friend in prison, pettion
 friend was Murder in front of petitioner
~~XXXX~~ Because gang member try to rob
 him for his Commissary. Petitioner
 is taken Medication for petitioner's
 Mental Health and is helping ~~XXXX~~ petiti
 ner a whole Lot. petitioner believe that
 petitioner wouldn't have access to
 Medication that petitioner is getting
 here in U.S. Ghana don't give free
 - (4)

Medication, petitioner leaving us to Ghana with no money going down there. petitioner can't buy medication. When you mental health, Ghana Label you as a Mad Man and they Beat you with a stick and throw stone at you. if petitioner deported to Ghana it will be very hard for petitioner and maybe Kill. Ghana will know petitioner have criminal record and they will take petitioner into custody with the Local authorities down there. petitioner

Can't receive Medication Management, Meet with a Psychiatrist and Continue with the regiment. Petitioner was confined at the federal institution for two weeks. with no medical help, therapies denied, psychologist's request denied, I was subjected into inhumane living conditions with my extensive medical issues.

Petitioner spoke to ICE officials about petitioner's medical mental health problem.

They ICE officials advised petitioner that they could not do anything to help petitioner. so petitioner put in 6 medical Request and the staff never helped or facilitated any type of support for medical problems. Petitioner then reached out to the ICE OFFICE PROFESSIONAL RESPONSIBILITY.

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TEAM and they advised they would reach out to someone. In a couple of days petitioner was on the way back to Stewart Detention Center. On 05/16/25 On 05/17/2025 petitioner was at Stewart Detention Center but petition mail was returned back to the court. On May 20, 2025 see exhibit (1). ICE deportation officer Jeffrey Knowles came to serve petitioner with four document and asked petitioner to sign. Petitioner did NOT sign because the information on there was false. see exhibit (2) One of the document was Notice of failure to comply. On that document, it states ~~petitioner~~ ~~was~~ ~~refused~~ On April 3rd, 2024, petitioner Refused to conduct an interview with Ghanaian Consulate. On April 3rd, 2024, petitioner was in prison at Ware State prison and never talked to ICE or deportation officer. petitioner notice of failure to comply was written and dated on May 13, 2025, A day after Respondent filed Motion. To dismiss petitioner application for Habeas Relief, also asked the ICE officer for a copy

(6)

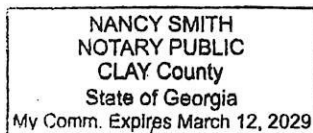
of the petitioner traveling documents
 And they ICE Refused to give it to
 petitioner, saying it was sent to
 Stewart Detention Center. At a later
 time, Petitioner also spoke to the
 Ghanaian Consulate and she advised
 me that she put the information on
 petitioner passport on petitioner travel
 document But petitioner advised her
 that she did not. Instead she put
 06/06/1980 which was wrong. Information
 The information on the petitioner
 passport is  Showing the
 information does not match. Then
 she went on saying, DOJ and ICE
 officers PRESSURED her into sending
 whatever information she had or ICE
 SEND. She advised petitioner that
 she has done all that she can.
 Petitioner Really stem from traumatic life
 starting from petitioner childhood growing
 up in Ghana as a young man. Petitioner
 entire family life becomes centered
 around petitioner father issues when petition
 er watch a group of men put a gun in
 petitioner father's head and ask him to
 give up information and asked petitioner
 to live the room while this happen to
 his father. ~~petitioner~~ petitioner stated

Skipping School because of what happen to petitioner father. Petitioner run for his life ~~for~~ because the group of Man will have taken him and Kill him. Ghana Police will not do anything about what happen to Petitioner's family. Petitioner told a good friend of petitioner father about what has happen and he help petitioner get a Student Visa to come to U.S. to Live. Petitioner fear to return back to Ghana.

CERTIFICATE OF SERVICE

This is to certify that I have on this date served opposing counsel, in the within and foregoing matter with a copy of the Respondent's Brief to the following address: U.S. Department of Justice
United States Attorney office
Middle District of Georgia
P.O. Box 2568
Columbus, GA 31902-2568

This the 2nd day of June, 2025.



Nancy Smith

6/6/25

Respectfully Submitted
Samuel Frimmborg Adusah
Samuel Frimmborg Adusah

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