

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

MAMADU BALDE,

Petitioner,

vs.

CLAIR DOLL, Warden, York County Prison;
JENNIFER RITCHEY, Director of the Philadelphia
Field Office of U.S. Immigration & Customs
Enforcement; THOMAS D. HOMAN, Director
(Acting), United States Immigration & Customs
Enforcement; and ELAINE C. DUKE, Secretary
(Acting), United States Department of Homeland
Security;

Respondents.

No: 1:CV-17-1446

(Kane, J/Carlson, MJ)

**PETITIONER'S REPLY TO RESPONDENTS' RESPONSE TO PETITION
FOR WRIT OF HABEAS CORPUS**

Petitioner respectfully replies to Respondents' August 29 Response to
Petition for Writ of Habeas Corpus (hereafter "Response"), Docket No. 8, as
follows:

REVISED FACTUAL STATEMENT

1. The underlying facts have become clearer in light of the exhibits, Docket
No. 8-1, attached to the Response and additional evidence provided by

the U.S. Attorney's office to Petitioners' counsel in response to Magistrate Judge Carlson's August 31 request that Respondents share probative documents.¹

2. Respondents do not dispute Petitioner's factual allegations through June 23, 2017, when he met with Sierra Leonean officials. *See* Petition for Writ of Habeas Corpus (hereafter "Petition"), Docket No. 1 at ¶¶ 17-40; Response, Docket No. 8 at 2-3; Ex. 1, Docket No. 8-1 at 3-5. In other words, it is undisputed that: (1) Mr. Balde has a final order of removal from 2011; (2) he was detained by ICE for nine-and-one-half months in 2012 while they tried—and failed—to deport him to Sierra Leone; (3) he has been compliant with all required conditions of his release, but was nonetheless re-detained on (or about) June 14, 2017; and (4) he was interviewed by Sierra Leonean consular officials on June 23 and once again denied travel documents. *See* Petition at ¶¶ 25, 31-40.
3. Specifically, Respondents do not dispute that Mr. Balde's deportation officer directed him during a regular check-in on June 7 that he once again should apply to the Sierra Leonean embassy for travel documents, or that—only one week later on June 14th— while Mr. Balde was in the

¹ Petitioner's counsel wishes to acknowledge the cooperation and assistance of the U.S. Attorney's Office, and especially Joanne Hoffman, in supplying relevant documents.

process of applying for travel documents, unidentified supervisory ICE officials changed their minds and directed his deportation officer to detain him. *See* Petition at ¶¶ 36-38.

4. Respondents admit that they did not re-detain Mr. Balde because he violated his release conditions, or that he failed to cooperate in applying for travel documents. ICE's June 15, 2017, "Notice of Revocation of Release" reads as follows:

This letter is to inform you that your case has been reviewed and it has been determined that you will be placed into custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has been made based on a review of your file, personal interview, and changed circumstances in your case. ICE has determined that there is a significant likelihood of removal in the reasonably foreseeable future in your case. *** *It has been determined that due to changed circumstances in policy; there is a significant likelihood that you may be removed in the reasonably foreseeable future.*

See Ex. 7, Docket No. 1-2 at 30 (emphasis added).

5. In citing the foregoing document, Respondents argue that "[d]uring the time between 2012 and the present, changing conditions have resulted in Sierra Leone issuing travel documents for its citizens; thus, on June 16, 2017, *Balde was returned to ICE custody to attend an interview with officials from Sierra Leone.*" Response, Docket No. 8 at 3 (emphasis added).

6. ICE arranged for Mr. Balde and other Sierra Leonean detainees to meet with Sierra Leonean consular officials at the York County Prison on June 23 to apply, once again, for travel documents. Petition, Docket No. 1 at ¶ 40; Response, Docket No. 8 at 3.
7. Thus, it is incontrovertible that as of June 14, after ICE re-detained Mr. Balde, ICE did not have cause to believe that Mr. Balde's deportation was reasonably foreseeable. If they did, they would not have needed to arrange the June 23 meeting with Sierra Leonean consular officials to apply for travel documents. Those documents would already have been issued. After the June 23 meeting and subsequent refusal to issue travel documents, any prospect of future deportation was necessarily diminished.
8. The parties dispute precisely what Mr. Balde told Sierra Leonean officials on June 23, but as discussed below that dispute is legally irrelevant. The dispute about what Mr. Balde told Sierra Leonean consular officials revolves around whether he claimed to be a native of Ivory Coast. In an unverified memorandum bearing no date, an ICE Detention and Deportation Officer, Joe Soto, alleges that Mr. Balde falsely claimed to hail originally from Ivory Coast, not Sierra Leone. Ex. 3, Docket 8-1 at 10. That unverified memo seemingly forms the entire

basis for ICE's decision to continue Mr. Balde's detention, indefinitely.

Id. at 8.

9. Mr. Balde denies that he misled Sierra Leonean officials, and will testify to that fact in court. Mr. Balde has engaged with U.S. immigration agencies, first INS and then ICE, since 1999. He has never claimed anything other than Sierra Leonean heritage. *See* Ex. 1-2, 4, 6-7, Docket No. 1-2. Every application in his name claims Sierra Leonean citizenship, and every document in his file indicates Sierra Leonean alienage. His most recent statement, given under oath to ICE officials after the June 23 interview, once again reiterates that both he and his parents are from Sierra Leone. *See* Ex. 5, Docket 8-1 at 14, 16. Mr. Soto's unverified claim that Mr. Balde somehow controverted decades of applications, meetings, sworn statements and court decisions in that one meeting is nonsensical.
10. Ivory Coast arose in the June 23 interview because the Sierra Leonean officials asked Mr. Balde where he learned to speak French. Mr. Balde responded that he attended school in Ivory Coast for four years. He never— nor has he ever— claimed he was from Ivory Coast, something he re-affirmed in the July 31 statement given under oath. *See* Ex. 5. Docket 8-1 at 17.

11. Assuming, *arguendo*, that Mr. Balde misled Sierra Leonean officials – which he adamantly denies – the truth is that Sierra Leone still has no record of his nationality and the misstatement does not affect the legality of the detention. Mr. Balde has been applying for travel documents since he was first detained in 2012, during which time he has invariably claimed Sierra Leonean heritage. Sierra Leone has refused to issue travel papers because they have no record of his alienage. Even if Mr. Balde had stated he is from another country, Sierra Leone has long considered his applications for travel documents based on Sierra Leonean citizenship, and has refused to accept him back.
12. Respondents nonetheless insist that Mr. Balde’s removal is reasonably foreseeable – both in their Response and during the August 31 telephone conference with the judge -- but the claim is unsustainable. Respondents acknowledge in their Response that, “[u]pon information and belief, Sierra Leone officials are reviewing [Mr. Balde’s] information to determine whether a travel document will issue.” Response, Docket No. 8 at 4. They do not say that issuance of travel documents is imminent; they merely say the Embassy is reviewing the application. Sierra Leonean officials have been “reviewing” Mr. Balde’s information for

over five years and consistently have refused to recognize his citizenship.

In that regard, nothing has changed to warrant Mr. Balde's re-detention.

13. Documents produced by Respondents' counsel illuminate what has transpired since Mr. Balde's meeting with Embassy officials on June 23.² Respondents have had three email exchanges with Sierra Leonean consular officials, contained in three email chains. We discuss them chronologically.

14. A cryptic July 18, 2017, email is sent by Ms. Sillah, from the Sierra Leonean embassy to Joe Soto, who is ICE's "Embassy Liaison." *See* Ex. 9, Docket No. 10-1 at 9. There is no message, but there is an attached file, titled "Sierra Leone for Interviews 2017 SPREED SHEET.xlsx" [sic]. That file, with information pertaining to other detainees redacted, is attached as Ex. 10, Docket No. 10-1 at 10. The spreadsheet was in fact prepared by ICE. *See* Ex. 8, Docket No. 10-1 at 2-6 (reverse chronologically). Sierra Leone merely filled in the column "detainee classification," i.e., which for Mr. Balde reads "non Sierra Leone." *Id.* None of the other information on the sheet, including the comment about Ivory Coast, was supplied by Sierra Leone. *Id.* The Sillah email, taken

² Respondents have attested that all communications between ICE and Sierra Leone from since June have been turned over to Petitioner's counsel. *See* Ex. 8, Docket No. 10-1 at 2.

together with the attached spreadsheet, does no more than reaffirm Sierra Leone's position that they have no record of Mr. Balde's nationality.

15. The second email chain is a series of three messages between ICE agent Soto and consular official Sillah. Ex. 11, Docket No. 10-1 at 12-13 (reverse chronologically). The oldest message, from August 4, is unrelated to Mr. Balde. Ms. Sillah replied to Soto's email on August 17 with a seemingly unrelated message, namely, requesting that the U.S. suspend *all* deportations:

In the light of the mudslide natural disaster that killed over 400 lives and over 600 unaccounted for, I am requesting that you put a hold on all deportations until situation improves in the country. Regards [sic]

Id. at 12. In an undated response, which was sent on or after August 17, Mr. Soto ignores Ms. Sillah's request to suspend all deportations and asks her to reconsider, in light of Mr. Balde's habeas petition, issuing travel papers. *Id.*

16. The third and latest email exchange begins with Mr. Soto's August 28 inquiry to another consular official, Mr. Kawa, asking "[h]as there been any reconsideration in issuing an ETC for BALDE...." Ex. 12, Docket No 10-1 at 16-17 (reverse chronologically). Ms. Sillah advises him to send the request. *Id.* Soto replies that he has asked the field office for

the documentation and filing fee. *Id.* Sillah tells him to expedite it, to which Soto agrees. *Id.*

17. The document referenced in the latest email exchange is simply the standard travel-document-application form; one that Mr. Balde has previously submitted to the Sierra Leone embassy. *See* Ex. 13, Docket No. 10-1 at 22. Respondents wanted Mr. Balde to sign the blank application form. Petitioner’s counsel, in turn, filled out the application form on August 31, pledging cooperation with the removal process, if it was to occur. *See* Ex. 14, Docket No. 10-1 at 24. The \$100 fee referenced by Respondents’ counsel during the August 31 call with the court is simply the non-refundable application fee, as is listed in the form “requirements.” *Id.*

18. In sum, there is no confirmation from Sierra Leonean officials that anything has changed or that they plan to issue travel documents for Mr. Balde. The documents merely confirm that ICE is asking Sierra Leone to reconsider its previous denials.

19. The only new and material information emerging from Respondents’ document production is that on August 17 the Sierra Leonean Embassy asked the U.S. to “put a hold on all deportations” until the country

recovers from the many deaths caused by mud slides. Ex. 11, Docket No. 10-1 at 12.

20. One other relevant development was reported in the news. On or about August 23, 2017, media outlets reported that the Department of Homeland Security had announced that “[t]he Trump administration will impose visa sanctions on four countries that refuse to take back foreign nationals deemed to be in the US illegally,” one of which is Sierra Leone. *See* David Shortell, *US to sanction 4 countries for refusing deportations*, CNN (August 24, 2017), accessible at <http://www.cnn.com/2017/08/23/politics/trump-visa-sanctions-immigration/index.html>. Plainly, Sierra Leone is not accepting everyone the U.S. is attempting to deport.

LEGAL ARGUMENT³

Respondents' re-detention of Mr. Balde is unconstitutional because they have no reasonable belief that he will be removed in the "reasonably foreseeable future." Ex.7, Docket No. 1-2 at 30. Respondents claimed, at the beginning of Mr. Balde's re-detention, that due to "changed circumstances *in policy*," without any further elaboration, there is a "significant likelihood that [he] may be removed in the reasonably foreseeable future." On June 23, 2017, Respondents arranged for

³ Respondents incorrectly claim that Clair Doll, the warden of York County Correctional Facility, is the only proper respondent based on an incomplete reading of *Rumsfeld v. Padilla*, 542 U.S. 426 (2004). Response, Docket 8 at 1 n. 1. "The statutory custodian requirement of 28 U.S.C. § 2241 is sufficiently flexible to permit the naming of respondents who are not immediate physical custodians if practicality, efficiency, and the interests of justice so demand." *Armentero v. INS*, 340 F.3d 1058, 1068 (9th Cir. 2003), *dismissed on other grounds*, 412 F.3d 1088 (9th Cir. 2005) (internal citations omitted). As the Ninth Circuit has explained: "[w]hen immigration detainees are held in state and local institutions—as they frequently are— a writ directed to the warden of the institution would make little legal sense, as the wardens' control over immigration detainees in their institutions results from their limited contractual arrangements with federal authorities." *Id.* The warden "do[es] not have any power to release detainees except if explicitly commanded to do so by federal authorities... [and] in reality has no legal power... to 'bring forth the body' of the detainee." *Id.* Naming the federal respondents is consistent with the Supreme Court's historical understanding of habeas corpus. *See INS v. St. Cyr*, 533 U.S. 289, 301 (2001) ("At its historical core, the writ of habeas corpus served as a means of reviewing the legality of Executive detention..."); *see also Hensley v. Mun Court, San Jose Judicial Dist., Santa Clara Cty.*, 411 U.S. 345, 350 (1973) ("[W]e have consistently rejected interpretations of the habeas corpus statute that would suffocate the writ in stifling formalisms or hobble its effectiveness with the manacles in arcane and scholastic procedural requirements.").

Mr. Balde to interview with officials from Sierra Leone, who again refused to recognize him as a Sierra Leonean citizen. Nearly three months later, Mr. Balde languishes in detention at York County Prison.

Respondents have adduced no specific evidence that Sierra Leone has now, after five years, changed its decision not to accept Mr. Balde. ICE's vague claims of changes in Sierra Leonean policy have failed to effectuate his removal. The argument that Mr. Balde "blocked his own removal" by misleading Sierra Leonean officials with a claim of being from Ivory Coast must be rejected because even if the incongruous and unverified claim by the ICE agent is true, that doesn't change the overriding fact that Sierra Leone has no record of his heritage – thus, Mr. Balde's removal still is not practically attainable. Respondents cannot meet their burden to justify Mr. Balde's detention and he should be released immediately.

Respondents Misapply *Zadvydas* in an Effort to Shift the Burden of Proof

Under *Zadvydas*, a noncitizen challenging post-removal-order detention must provide "good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future." *Zadvydas*, 533 U.S. at 701. To prevent indefinite detention, which violates constitutional due process, the Court set a "presumptively reasonable period of detention" at six months. *Id.* The Court was clear that after six months the equities change: "After this six-month period, once the alien provides good reason to believe that there is no significant likelihood of

removal in the reasonably foreseeable future, *the Government must respond with evidence sufficient to rebut that showing.*” *Id.* (emphasis added).⁴ The Court also cautioned that “for detention to remain reasonable, as the period of prior post-removal confinement grows, what counts as the ‘reasonably foreseeable future’ conversely would have to shrink.” *Id.* In other words, after six months the government needs much more specific evidence of imminent removal. Unless removal is “practically attainable,” the noncitizen must be released; otherwise, continued detention would violate his liberty interest to be free from civil detention. *Id.* at 690, quoting *Jackson v. Indiana*, 406 U.S. 715, 738 (1972).

Since Mr. Balde spent more than six months in ICE detention in 2012 – nine-and-one-half months – and was released because his removal was not reasonably foreseeable, the government, not Mr. Balde, now bears the burden to demonstrate that removal is “practically attainable” in the very near future. *Id.* The

⁴ See also, *Khader v. Holder*, 843 F. Supp. 2d 1202, 1206, (N.D. Ala. 2011) (“Once the alien has made the initial requisite showing, *the burden shifts* to the government to respond with evidence sufficient to rebut the alien’s showing.” (citations omitted) (emphasis added)); *Kacanic v. Elwood*, 2002 U.S. Dist. LEXIS 21848, *10, (E.D. Pa. Nov. 8, 2002) (“*The burden then shifts* to the Government to ‘respond with evidence to rebut that showing.’” (emphasis added)).

government's evidentiary burden is heightened; simply claiming that Sierra Leone is likely to issue travel documents is insufficient.⁵

Respondents' argument that the removal period "re-commenced" when Mr. Balde was imprisoned for a second time, Response, Docket 8 at 5, ignores the letter and spirit of *Zadvydas*. Respondents essentially argue that because there was a gap in Mr. Balde's civil imprisonment, the Court should discount the violation to Mr. Balde's liberty interest. While *Zadvydas* does not explicitly address breaks in detention, the constitutional problem arising out of 8 U.S.C. § 1231(a)(6) was the potential for indefinite deprivation of liberty without protection. *Id.* at 690 ("The serious constitutional problem arising out of a statute that, in these circumstances, permits an indefinite, perhaps permanent, deprivation of human liberty without any [due process] protection is obvious."). It is clear that a series of releases and re-detentions by the Government places an unconstitutional burden on the liberty interests of those re-detained. *See, e.g., Chen v. Holder*, Civ. No. 6:14-2530 (W.D. La. Nov. 20, 2015).

⁵ *See, e.g., Kenneh v. Tompkins*, No. 17-cv-10490-IT (D. Mass. Aug. 9, 2017) (finding that the Government's "assurances of what a foreign government was likely to do was not sufficient to rebut Petitioner's showing"); *Khader*, F. Supp. 2d at 1209 (finding that the Government failed to rebut Petitioner's showing when it "[a]ttempted to secure a travel document... but [could] identify no specific evidence to support the position that his removal is likely in the reasonably foreseeable future").

By evading the reasoning of *Zadvydas*, the government is seeking to re-argue that § 1231(a)(6) “authorizes detention until it approaches constitutional limits” – the same position rejected by the Supreme Court in *Clark v. Martinez*, 543 U.S. 371, 384-85 (2005) (stating “[t]hat is not the legal world we live in... the canon [of constitutional avoidance] functions as a means of choosing” between one of many potential statutory meanings). Thus, under *Zadvydas*, the presumptively reasonable period of detention is 6 months in the aggregate, and after that 6-month period, the Government bears the burden to show that there is a “significant likelihood of removal in the reasonably foreseeable future.” *Zadvydas*, 533 U.S. at 701. (“We do have reason to believe... that Congress previously doubted the constitutionality of detention for more than six months.”). And since Mr. Balde has now spent over a year in post-removal detention, *Zadvydas* counsels that how much time counts as “reasonably foreseeable future” has shrunk considerably. *Id.*

Respondents’ Argument That the *Zadvydas* Time Limit is Tolled Because Mr. Balde Refused to Cooperate Fails as a Matter of Fact.

Respondents only argument in support of their continued detention is that Mr. Balde “provided fraudulent information” to officials from Sierra Leone, specifically that Mr. Balde told the officials that he was from Ivory Coast. Response, Docket 8 at 3-4. Mr. Balde did not, nor has he ever before, claimed to be from the Ivory Coast. In his sworn statement, Mr. Balde stated that he was asked “Where did you learn French?” and he responded that he learned the language

while he was attending school in the Ivory Coast for four years. Ex. 5, Docket 8-1 at 17. Moreover, by Respondents own admission, ICE “reviewed Balde’s file and discussed with Sierra Leone officials that everything in his file substantiates that he is a citizen of Sierra Leone.” Response, Docket 8 at 4 (describing the uncontested and substantial evidence that Mr. Balde is a citizen of Sierra Leone). Respondents have failed to provide *any* evidence that Sierra Leone refuses to issue travel documents because of their interview or because they believe Mr. Balde is from the Ivory Coast. The comment about Ivory Coast on the spreadsheet row discussing Mr. Balde, Ex. 10, Docket 10-1 at 10, was inserted by ICE. See Fact Statement at ¶ 14, *supra*. The only information supplied by Sierra Leone reiterates the fact that Mr. Balde is classified as “non Sierra Leone” – the same status he has held for the past five years. Thus, Respondents’ argument that Mr. Balde attempted to “block his own removal” is both disingenuous and does not meet their burden to rebut Mr. Balde’s showing that that there is no significant likelihood of removal in the reasonably foreseeable future. *Zadvydas*, 533 U.S. at 701.

Respondents Have Not Met Their Burden to Justify Mr. Balde’s Detention

Respondents have not met their burden to show that Mr. Balde’s removal is practically attainable in the reasonably foreseeable future. As discussed in the factual statement, Respondents have simply re-applied for travel documents. The Sierra Leonean government rejected the application in June, and their

communications since then indicate only that they will consider a new application. Under the circumstances, Respondents' claim that Sierra Leone is likely to issue travel documents is insufficient.⁶ Courts have found no reasonable likelihood of removal in cases where the embassy failed or refused to respond,⁷ where the detainee's country of origin refuses to issue a travel document for the detainee,⁸ and where there was no definitive answer from the target country after several months as to whether it would issue travel papers for a detainee.⁹ Sierra Leone has repeatedly declined to issue travel documents over the past five years and at best they have now said they will entertain a new application.

⁶ See, *supra*, n. 5.

⁷ See *Butt v. Holder*, 2009 U.S. Dist. LEXIS 36576, 2009 WL 1035354, *5 (S.D. Ala. March 19, 2009) (holding that the petitioner met his initial burden under *Zadvydas* where he was held in ICE custody for ten and one-half months since his removal order with no indication from the Pakistani Embassy that a travel document would be issued); *Andreasyan v. Gonzales*, 446 F. Supp. 2d 1186, 1190 (W.D. Wash. 2006) (petitioner satisfied initial burden where he was detained for eight months since his order of removal became final and his travel document application was simply "still under review and pending a decision").

⁸ See, e.g., *Rajigah v. Conway*, 268 F. Supp. 2d 159, 166 (E.D.N.Y. 2003); *Shefqet v. Ashcroft*, 2003 U.S. Dist. LEXIS 7075, No. 02-C7737, 2003 WL 1964290, *3 (N.D. Ill. April 28, 2003); *Seretse-Khama v. Ashcroft*, 215 F. Supp. 2d 37, 46-48 (D.D.C. 2002).

⁹ See *Kacanic*, 2002 U.S. Dist. LEXIS 21848, No. 02-8019, 2002 WL 30520362, *10-11.

Respondents' argument that during the "time between 2012, changing conditions have resulted in Sierra Leone issuing travel documents for its citizens," Response, Docket 8 at 3, is also insufficient to carry their burden. Respondents attempt to substantiate that claim by stating that there were 18 removals to Sierra Leone in 2016. Ex. 2, Docket 8-1 at 7. Yet, available statistics show that in 2012, there were *more* removals to Sierra Leone than in 2016. Transactional Records Access Clearinghouse, ICE Deportations by Country of Citizenship FY 2012 – FY 2013, <http://trac.syr.edu/immigration/reports/350/include/table4.html> (last visited Sept. 2, 2017) (showing 21 removals to Sierra Leone in 2012). Respondents' cherry-picking of figures is not compelling, nor do those figures indicate how many Sierra Leonean nationals were subject to final orders of removal, how many the Government actually tried to deport, or what the "changing conditions" are. The issue is not whether Sierra Leone accepts any deportees. Sierra Leone is not like Vietnam, which, as a matter of policy, declines to issue travel documents for Vietnamese who came to this country before July 1995. Sierra Leone has always accepted verifiable citizens. The issue is that, for many, Sierra Leonean citizenship cannot be confirmed because so many records were lost or destroyed in the civil war—Mr. Balde falls into this category. No policy change will resurrect those documents.

Furthermore, the U.S. government's announcement that it is considering sanctions against Sierra Leone for failing to cooperate in deportations belies Respondents' claim of improving relations. Sanctions would be unnecessary if Sierra Leone were admitting everyone the U.S. was trying to deport; obviously, they are not. And Mr. Balde's removal has become even less likely after the August 17 email from the Sierra Leonean Embassy directing a halt to deportations while the country recovers from the deadly mudslides.

Put simply, it is unclear why Mr. Balde is still imprisoned, or why he was originally detained more than 2 months ago. But it is clear that removal is not "practically attainable" at this time, *Zadvydas*, 533 U.S. at 690, and that continued detention is thus unreasonable. Without a prospect of removal, Mr. Balde's detention is punitive and unconstitutional. Moreover, it is not reasonably necessary to detain Mr. Balde to effectuate his removal. Even if the Government is able to secure his removal, which is highly unlikely, Mr. Balde's continued cooperation renders detention unnecessary. *See Zadvydas*, 533 U.S. at 699-700 (if "continued detention is unreasonable and no longer authorized by statute ... the alien's release may and should be conditioned on any of the various forms of supervised release....").

Respectfully submitted,

/s/ Ashley E. Lively
Ashley E. Lively, Esq.
PA ID No. 315400
JBM Legal, LLC
428 Forbes Avenue, Suite 1410
Pittsburgh, PA 15219

/s/ Witold J. Walczak
Witold J. Walczak, Esquire
PA ID. No. 62976
American Civil Liberties Union of
Pennsylvania
247 Fort Pitt Blvd.
Pittsburgh, PA 15222
Telephone: (412) 681-7864
Fax: (412) 681-8707
VWalczak@aclupa.org

Attorneys for Petitioner Mamadu Balde

Date: September 7, 2017

SERVICE via ECF