

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

EYIDI AMBILA,

Petitioner,

v.

KEVIN JOYCE, in his official capacity as Sheriff  
of Cumberland County; PATRICIA HYDE, in her  
official capacity as Acting Director of Boston Field  
Office, U.S. Immigration and Customs  
Enforcement; KRISTI NOEM, in her official  
capacity as Secretary of the U.S. Department of  
Homeland Security; and PAMELA BONDI, in her  
official capacity as Attorney General of the United  
States,

Respondents.

Case No. \_\_\_\_\_

**ORAL ARGUMENT  
REQUESTED**

**REQUEST FOR IMMEDIATE  
RELIEF**

**PETITION FOR WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241**

**INTRODUCTION**

1. Petitioner, Eyidi Ambila, is a 44-year-old man who has lived in the United States since he was 7 years old. Petitioner's entire family lives in the United States, and he has spent his career working and paying taxes in this country. Petitioner is also stateless: his country of origin, the Democratic Republic of the Congo (DRC), has no record of petitioner's birth and has denied requests to issue Petitioner a passport and other official documents. The United States is the only home Petitioner has known, and Petitioner has ties to his community and a support structure established to support him upon release.

2. Petitioner hereby petitions this Court for a writ of habeas corpus to remedy Petitioner's unlawful detention by Respondents. Petitioner has been in U.S. Immigration and Customs Enforcement (ICE) detention since September 23, 2024, totaling 8 months. Petitioner's prolonged detention became unconstitutional after the period reasonably necessary for removal (presumptively six months) elapsed on March 23, 2025. Petitioner has long had an administratively final order of removal (since February 12, 2007) and removal is not reasonably foreseeable because for 18 years the Department of Homeland Security (DHS) has attempted and failed to obtain the travel documents necessary for Petitioner's removal. To vindicate Petitioner's constitutional and statutory rights and to put an end to his continued arbitrary detention, this Court should grant the instant petition for a writ of habeas corpus.
3. Petitioner's detention violates due process because he is being held in indefinite detention and there is no reasonable likelihood of removal in the foreseeable future. Petitioner's removal is not reasonably foreseeable because he is stateless: Petitioner's country of origin is the DRC, but the Congolese government has stated in writing that it does not have records of Petitioner's birth or origin in the country. Because the DRC does not recognize Petitioner as a citizen, the country has denied DHS's attempts to obtain a passport or other official documents for Petitioner. Absent an order from this Court, Petitioner will likely remain detained for many more months, if not years.
4. Petitioner asks this Court to find that his prolonged incarceration is unreasonable and to order his immediate release.

### **JURISDICTION**

5. Petitioner is detained in civil immigration custody at Cumberland County Jail in Portland, Maine. He has been detained in U.S. Immigration and Customs Enforcement (ICE) custody since September 23, 2024.
6. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*
7. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).
8. This Court may grant relief under 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

#### **VENUE**

9. Venue is proper because Petitioner is detained at Cumberland County Jail in Portland, Maine, which is within the jurisdiction of this District.
10. Venue is proper in the District of Maine pursuant to 28 U.S.C. § 1391(e), because Respondents are officers, employees, or agencies of the United States and Respondent Sheriff Kevin Joyce resides in this District, and a substantial part of the events giving rise to Petitioner's claims occurred in this District.

#### **PARTIES**

11. Petitioner is a resident alien. Petitioner is currently detained in U.S. Immigration and Customs Enforcement (ICE) custody at Cumberland County Jail (CCJ). Petitioner has been held in ICE custody at CCJ since September 23, 2024, and he is in the custody, and under the direct control, of Respondents and their agents.

12. Respondent Kevin Joyce is sued in his official capacity as the Cumberland County Sheriff who is in control of the Cumberland County Jail. Respondent Joyce has immediate physical custody of Petitioner pursuant to the facility's contract with the U.S. Marshals Service to detain federal prisoners and detainees, including detained noncitizens under the authority of ICE. Respondent Joyce is the legal custodian of Petitioner.
13. Respondent Patricia Hyde is sued in her official capacity as the Acting Director of the Boston Field Office of U.S. Immigration and Customs Enforcement. Respondent Hyde is a legal custodian of Petitioner and has authority to release him.
14. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, Respondent Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees ICE, the component agency responsible for Petitioner's custody. Respondent Noem is a legal custodian of Petitioner.
15. Respondent Pamela Bondi is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice. In that capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review, which administers the immigration courts and the Board of Immigration Appeals. Respondent Bondi is a legal custodian of Petitioner.

### **STATEMENT OF FACTS**

16. Petitioner is a 44-year-old citizen of Democratic Republic of the Congo (DRC) who has lived in the United States since he was 7 years old. Petitioner's entire family lives in the United States, including his father (U.S. citizen), stepmother (U.S. citizen), sister (legal permanent resident), four half-siblings (U.S. citizens), and three children (U.S. citizens).

Petitioner is the primary provider for his two minor children, and he has maintained consistent employment at various manufacturing and construction jobs and pays his taxes. The United States is the only home Petitioner has known. Moreover, based on his father's history of political activities and persecution, and the ongoing political persecution of ethnic minorities including Petitioner's tribe, Petitioner fears he would be subjected to persecution should he be removed to the DRC.

17. Petitioner was born in Kinshasa, DRC (then Zaire).
18. Petitioner arrived in the United States in 1989 when he was 7 years old with his father and sister, and Petitioner has remained in the country ever since.
19. Petitioner and his family fled political persecution in the DRC. Petitioner's father was involved in political activities in opposition to the ruling party that put the family in danger and, ultimately, forced the family to flee.
20. Petitioner and his family sought and were granted asylum upon arrival in the United States. Petitioner received a green card when he was 7 years old, and a social security number.
21. On or around December 2005, Petitioner was detained in U.S. Immigration and Customs Enforcement (ICE) custody following a felony conviction.
22. On October 5, 2006, Petitioner was ordered removed to the DRC.
23. On February 12, 2007, Petitioner was subject to an administratively final order of removal when the Board of Immigration Appeals denied Petitioner's *pro se* appeal of his order of removal.
24. On March 23, 2007, Petitioner, while detained in ICE custody at Suffolk County House of Corrections, filed *pro se* a petition for a writ of habeas corpus under 28 U.S.C. § 2241,

seeking emergency relief to stay his removal. Because Sec. 106(c) of the REAL ID Act of 2005 stripped United States district courts of jurisdiction to review challenges to removal orders, the petition was dismissed on April 4, 2007.

25. On May 24, 2007, Petitioner, while still detained in ICE custody at the Suffolk County House of Correction, filed *pro se* a petition for a writ of habeas corpus under 28 U.S.C. § 2241 to challenge his indefinite post-removal detention. The case was terminated as moot on August 27, 2007 because Petitioner was released from Department of Homeland Security (DHS) custody.
26. On or about August 7, 2007, Petitioner was released from DHS custody under an Order of Supervision.
27. Petitioner lived in the community under an Order of Supervision from 2007 to 2024, during which he regularly reported to ICE. Under the Order of Supervision, Petitioner complied with regular reporting requirements, including reporting to ICE each month for the initial six months after his release from detention and then reporting at six-month intervals for the remaining years. During this routine reporting, Petitioner kept the government apprised of his residential address, work, and other information requested. Petitioner also complied with all of the government's requests to apply for travel documents from the DRC, including producing evidence of his travel to the DRC embassy in Washington, D.C. and his applications for a passport and other official documents. Petitioner also routinely demonstrated his compliance with the Order of Supervision to maintain his employment authorization document through U.S. Citizenship and Immigration Services.

28. On May 20, 2024 Petitioner was arrested and placed in state custody, and on September 23, 2025 he was convicted of misdemeanor reckless conduct (class D) and misdemeanor domestic violence assault (class D) as part of a plea agreement at the Cumberland County Superior Court in Portland, Maine.
29. On September 23, 2024, Petitioner completed his criminal sentence and was transferred into ICE custody at Cumberland County Jail.
30. On September 24, 2024, Respondent Patricia Hyde, in her official capacity as the Acting Director of the Boston Field Office of ICE, informed Petitioner of his revocation of release. Respondent stated that Petitioner would be held in ICE custody and that there was a significant likelihood of removal in the reasonably foreseeable future.
31. On November 8, 2024, Petitioner received notice about his 90-day custody review. ICE notified Petitioner that his custody status would be reviewed on or about December 12, 2024 for consideration of release on an Order of Supervision. According to the notice, Petitioner should have been provided a decision in his custody status review on or about December 22, 2024. Petitioner has never received a decision in his 90-day custody review.
32. On January 23, 2025, Petitioner received notice for a telephonic interview as part of ICE's review of his custody status, and on February 26, 2025 Petitioner attended the telephonic interview. Petitioner has still never received a decision in his 90-day custody review.
33. Petitioner did not receive any communication or information from ICE regarding his 180-day custody review.

34. From February 26, 2025 to present, Petitioner has received no further communication or information from ICE regarding his removal or release from custody.

**DHS has repeatedly failed to obtain travel and other official documents to remove Petitioner**

35. Petitioner has cooperated fully with all of ICE's efforts to remove him. Specifically,

Petitioner has made repeated, failed attempts to obtain a Congolese passport and travel documents necessary for his removal. See Exhibits A, B, C.

36. On March 2, 2007, DHS requested travel documents from the Congolese government to effectuate Petitioner's removal. DHS never obtained these travel documents.

37. On November 19, 2018, Petitioner submitted a written passport application form to the Ministry of Foreign Affairs, Democratic Republic of the Congo. See Exhibit A.

38. On November 24, 2018, Petitioner received notice from the Ministry of Foreign Affairs, Democratic Republic of the Congo denying his application for a passport because the country had no record of Petitioner's birth or presence in the DRC. See Exhibit B.

Petitioner previously submitted this denial letter to ICE.

39. On June 2, 2020, Petitioner again submitted a written passport application form to the Ministry of Foreign Affairs, Democratic Republic of the Congo. See Exhibit C.

40. In September 2024, soon after he was transferred into ICE custody, Petitioner completed documents used by ICE to request travel documents for an alien ordered removed but who does not possess valid travel documents.

41. From 2007 to present, DHS has never obtained travel documents for Petitioner.

Throughout these 18 years, DHS and Petitioner have made multiple, failed attempts to procure a passport and other travel documents for Petitioner from the DRC.



42. As a result of ICE's failure to obtain travel and other official documents for removal, ICE has been unable to remove Petitioner from the United States.

43. ICE is unlikely to remove Petitioner in the reasonably foreseeable future.

### **Experience in Detention**

44. While in ICE custody for the past 8 months, Petitioner has been unable to maintain paid employment or provide for his family, including his two minor children. Without Petitioner's income, his family has struggled financially.

45. Petitioner's detention in ICE custody has caused significant hardship for his family.

Before he was held in ICE custody, Petitioner was actively involved in the lives of his two minor children, supporting them in their academic and athletic pursuits. While in ICE custody, Petitioner has maintained his bond with his children through regular phone calls; however, Petitioner's absence from the family has caused both children psychological harm.

46. If released, Petitioner will be supported by family and friends in the United States. In particular, Petitioner has secured living accommodations with a friend from his church congregation in South Portland. Moreover, Petitioner has maintained professional relationships and has lined up several structural engineering projects to resume work upon release.

### **LEGAL FRAMEWORK**

47. Pursuant to 28 U.S.C. § 2243, the Court either must grant the instant petition for writ of habeas corpus or issue Respondents an order to show cause, unless Petitioner is not entitled to relief. If the Court issues an order to show cause, Respondents must file a

response “within *three days* unless for good cause additional time, *not exceeding twenty days*, is allowed.” 28 U.S.C. § 2243 (emphasis added). After Respondents file a response, the Court must schedule a hearing, “not more than five days after the return unless for good cause additional time is allowed.” 28 U.S.C. § 2243. Respondent must “produce at the hearing the body of the person detained,” unless the petition and response “present only issues of law.” 28 U.S.C. § 2243. “The [C]ourt shall summarily hear and determine the facts, and dispose of the matter as law and justice require.” 28 U.S.C. § 2243.

48. “It is well established that the Fifth Amendment entitles [noncitizens] to due process of law in deportation proceedings.” *Demore v. Kim*, 538 U.S. 510, 523 (2003) (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993)). “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

49. The Due Process Clause applies to all persons in the United States, “whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S. at 693. Thus, fundamental due process protection applies to all noncitizens, including both removable and inadmissible noncitizens. *See id.* at 721 (Kennedy, J., dissenting) (“[B]oth removable and inadmissible [noncitizens] are entitled to be free from detention that is arbitrary or capricious.”). It also protects noncitizens who have been ordered removed from the United States and who face continuing detention. *Id.* at 690.

50. Furthermore, 8 U.S.C. § 1231(a)(1)-(2) authorizes detention of noncitizens during “the removal period,” which is defined as the 90-day period beginning on “the latest” of: (1) “[t]he date the order of removal becomes administratively final”; (2) “[i]f the removal

order is judicially reviewed and if a court orders a stay of the removal of the [noncitizen], the date of the court's final order"; or (3) "[i]f the [noncitizen] is detained or confined (except under an immigration process), the date the [noncitizen] is released from detention or confinement."

51. Although 8 U.S.C. § 1231(a)(6) permits detention "beyond the removal period" of noncitizens who have been ordered removed and are deemed to be a risk of flight or danger, the Supreme Court has recognized limits to such continued detention. In *Zadvydas*, the Supreme Court held that "the statute, read in light of the Constitution's demands, limits [a noncitizen's] post-removal-period detention to a period reasonably necessary to bring about that [noncitizen's] removal from the United States." 533 U.S. at 689. "[O]nce removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute." *Id.* at 699.

52. In determining the reasonableness of detention, the Supreme Court recognized that, if a person has been detained for longer than six months following the initiation of their removal period, their detention is presumptively unreasonable unless deportation is reasonably foreseeable; otherwise, it violates that noncitizen's due process right to liberty. *Zadvydas*, 533 U.S. at 701. In this circumstance, if the noncitizen "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.*

53. The Supreme Court's ruling in *Zadvydas* is rooted in the due process requirement that there be "adequate procedural protections" to ensure that the government's asserted justification for a noncitizen's physical confinement "outweighs the 'individual's

constitutionally protected interest in avoiding physical restraint.” *Id.* at 690 (quoting *Kansas v. Hendricks*, 521 U.S. 346, 356 (1997)). In the immigration context, the Supreme Court only recognizes two purposes for civil detention: preventing flight and mitigating the risks of danger to the community. *Zadvydas*, 533 U.S. at 690; *Demore*, 538 U.S. at 528. The government may not detain a noncitizen based on any other justification.

54. The first justification of preventing flight, however, is “by definition . . . weak or nonexistent where removal seems a remote possibility. *Zadvydas*, 533 U.S. at 690. Thus, where removal is not reasonably foreseeable and the flight prevention justification for detention accordingly is “no longer practically attainable, detention no longer ‘bears [a] reasonable relation to the purpose for which the individual [was] committed.’” *Id.* (quoting *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). As for the second justification of protecting the community, “preventive detention based on dangerousness” is permitted “only when limited to specially dangerous individuals and subject to strong procedural protections.” *Zadvydas*, 533 U.S. at 690-91.

55. Thus, under *Zadvydas*, “if removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by statute.” *Id.* at 699-700. If removal is reasonably foreseeable, “the habeas court should consider the risk of the [noncitizen’s] committing further crimes as a factor potentially justifying the confinement within that reasonable removal period.” *Id.* at 700.

56. At a minimum, detention is unconstitutional and not authorized by statute when it exceeds six months and deportation is not reasonably foreseeable. *See Zadvydas*, 533 U.S. at 701 (stating that “Congress previously doubted the constitutionality of detention for more than six months” and, therefore, requiring the opportunity for release when

deportation is not reasonably foreseeable and detention exceeds six months); *see also Clark v. Martinez*, 543 U.S. 371, 386 (2005).

## **CLAIMS FOR RELIEF**

### **COUNT ONE**

#### **Violation of Fifth Amendment Right to Due Process**

57. Petitioner re-alleges and incorporates by reference the paragraphs above as though fully set forth herein.
58. The Due Process Clause of the Fifth Amendment forbids the government from depriving any “person” of liberty “without due process of law.” U.S. Const. amend. V.
59. Petitioner’s removal order became administratively final on February 12, 2007.
60. Petitioner has been detained by Respondents for over 8 months. During all of these 8 months Petitioner has had an administratively final order of removal.
61. Petitioner entered U.S. Immigration and Customs Enforcement (ICE) custody on September 23, 2024 and the 6-month removal period elapsed on March 23, 2025.
62. Petitioner’s prolonged detention is not likely to end in the reasonably foreseeable future. Since 2007, the Department of Homeland Security (DHS) has failed to obtain travel documents to remove Petitioner. During these 18 years, Petitioner has cooperated with all removal efforts but his country of origin, Democratic Republic of the Congo, has concluded that Petitioner is not a citizen and denied all attempts to obtain a passport or other official documents. Thus, Petitioner is stateless. Where, as here, removal is not reasonably foreseeable, detention cannot be reasonably related to the purpose of

effectuating removal and thus violates due process. *See Zadvydas*, 533 U.S. at 690, 699-700.

63. For these reasons, Petitioner's ongoing prolonged detention violates the Due Process Clause of the Fifth Amendment.

## **COUNT TWO**

### **Violation of 8 U.S.C. § 1231(a)**

64. Petitioner re-alleges and incorporates by reference the paragraphs above as though fully set forth herein.

65. The Immigration and Nationality Act at 8 U.S.C. § 1231(a) authorizes detention "beyond the removal period" only for the purpose of effectuating removal. 8 U.S.C. § 1231(a)(6); *see also Zadvydas*, 533 U.S. at 699 ("[O]nce removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute."). Because Petitioner's removal is not reasonably foreseeable, his detention does not effectuate the purpose of the statute and is accordingly not authorized by § 1231(a).

### **PRAYER FOR RELIEF**

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Declare that Respondents' ongoing prolonged detention of Petitioner violates the Due Process Clause of the Fifth Amendment and 8 U.S.C. § 1231(a);
- (3) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately;
- (4) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and

(5) Grant any further relief this Court deems just and proper.

Dated: May 22, 2025

/s/Heather L. Zimmerman

Heather L. Zimmerman  
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OF MAINE FOUNDATION  
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Portland, ME 04112  
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/s/Anahita D. Sotoohi

Anahita D. Sotoohi  
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Respectfully submitted,

/s/Carol J. Garvan

Carol J. Garvan  
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/s/Zachary Heiden

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COUNSEL FOR PETITIONER

**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

We represent Petitioner, Eyidi Ambila, and submit this verification on his behalf. We hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241 are true and correct to the best of our knowledge.

Dated this 22nd day of May 2025.

# EXHIBIT A



[Coat of arms] Democratic Republic of the Congo  
Minister of Foreign Affairs and International Cooperation  
AMBA DRC / WASHINGTON TL 100

### **APPLICATION FORM FOR A SUBSTITUTE FOR PASSPORT**

EMBASSY OF THE DEMOCRATIC REPUBLIC OF CONGO  
1100 Connecticut Ave NW, Suite 725  
Washington, DC 20036

#### **A. PLEASE ATTACH TO THIS FORM**

1. Photocopy of residence permit or proof of a long-stay visa

Last name: AMBILA	
Name: EYIDI	
Middle name:	
Place of birth: KINSHASA	Date of birth: <input type="text"/> <input type="text"/> <input type="text"/> dd / mm / yyyy
Sex: M	Marital status: Married (Married, Single, Widowed, Divorced)
Profession: TECHNICIAN	
Full residential address: <input type="text"/> [illegible]	
Phone number: <input type="text"/>	Email address: [Illegible]
Facial features: ROUND FACE	Eye color: BROWN
Height: 1.75 m	Distinguishing marks: N/A
Father's full name:	
Mother's full name: MUTOMBO [illegible]	
Ethnic group: LULUA	Place of origin: [Illegible]/MSAMPI
Territory: DIBAYA	Sector: DIBATAYI
District: DIBATAYI	Province: [Illegible]
Nationality of origin: CONGOLESE	Current Nationality: N/A
* Submission of documents for favorable processing at the time of application	
	APPLICANT'S SIGNATURE (Do not sign outside the box)  [Signature]
Here I certify that the information provided is accurate	
Date of Application: 11/19/2018	APPLICANT'S SIGNATURE UPON RECEIPT OF THE SUBSTITUTE PASSPORT
NB. RESERVED FOR ADMINISTRATION	
VOTER OR IDENTIFICATION CARD NUMBER	

[Illegible]



République Démocratique du Congo  
Ministère des Affaires Étrangères et Coopération Internationale  
AMBA RDC / WASHINGTON TL100

FORMULAIRE DE DEMANDE DE TENANT LIEU DE PASSEPORT

A JOINDRE AU PRÉSENT FORMULAIRE

AMBASSADE DE LA REPUBLIQUE  
DEMOCRATIQUE DU CONGO  
1100 Connecticut Ave. N.W. Suite 725  
Washington, D.C. 20036

☐ 1. Photocopie de la carte de résidence ou preuve d'un lieu de résidence

Nom: EMBI LA

Postnom: EMBI

Prénom: —

Lieu de naissance: KINSHASA Date de naissance: [REDACTED]

Sexe: M Etat Civil: MARIÉ

(Marié(s), Célibataire, Veuf(ve), Divorcé(e))

Profession: TECHNICIEN

Adresse complète de résidence: [REDACTED]

Numéro de téléphone: [REDACTED] Adresse électronique: [REDACTED]

Visage: ROND Couleur des yeux: BRUN

Taille: 1,75 m Signe particulier: N/A

Noms du père: —

Noms de la mère: MUTANDA MBALANG (MBOGUE)

Groupe ethnique: KUVA Localité d'origine: TSHIKANGA/VISAMBI

Territoire: DIBAIA Secteur: DIBATAY

District: DIBATAY Province: KASAI-ORIENTAL

Nationalité d'origine: CONGOLAISE Nationalité actuelle: N/A

\*Pièces à présenter lors de la demande pour avis favorable

☒ Je certifie que ces renseignements sont exacts

Date de la demande: 11/19/2013

NB: CADRE RÉSERVÉ À L'ADMINISTRATION  
N° DE LA CARTE D'ÉLECTEUR OU  
D'IDENTIFICATION

SIGNATURE DU REQUÉRANT (Ne pas sortir du cadre)

SIGNATURE DU REQUÉRANT À LA RÉCEPTION  
DU TENANT LIEU DE PASSEPORT

**Certification of Translation**

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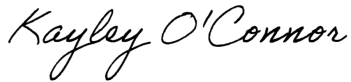
**DATE: 5/7/2025**

I, Kayley O'Connor, Language Link Project Manager, certify on behalf of Language Link, a professional Language Service Provider, that the following document(s):

- DRC-MINISTER OF FOREIGN AFFAIRS STATEMENT- PASSPORT REQUEST- French.pdf
- Eyidi Ambila DRC Embassy signed Form [IMG\_20181127].jpg

was/were completed by a professional linguistic team in the following language pairs:

- French(European)>English

A handwritten signature in black ink that reads "Kayley O'Connor".

---

(Project Manager Signature)

**5/7/2025**

---

(Date)

# EXHIBIT B

Democratic Republic of the Congo  
MINISTER OF FOREIGN AFFAIRS AND  
INTERNATIONAL COOPERATION  
[Coat of arms]

MINISTER OF FOREIGN AFFAIRS STATEMENT ON CURRENT PASSPORT  
REQUEST IN THE DEMOCRATIC REPUBLIC OF THE CONGO

Dear Mr. Ambila Eyidi,

KINSHASA—We regret to notify you of the denial of your recent passport application. This decision was made after an identification investigation using the information you supplied to our embassy in Washington, D.C., USA. There is no indication in our records of your birth certificate or place of origin in the Democratic Republic of the Congo (DRC). Due to the absence of documentation and proof of identity, we are unable to process any application for a passport or other travel documents at the DRC Embassy in the United States.

*KINSHASA—Democratic Republic of the Congo (DRC)*  
*Minister of Foreign Affairs and International Cooperation*  
*Office of the Minister of Foreign Affairs and International Cooperation*  
*Kinshasa Gombe*  
*Léonard She Okitundu*  
*Issued in Kinshasa on November 24, 2018*  
*[Flag] **Democratic Republic of the Congo***

République Démocratique du Congo  
MINISTÈRE DES AFFAIRES ÉTRANGÈRES ET DE  
LA COOPÉRATION INTERNATIONALE



MINISTER OF FOREIGN AFFAIRS STATEMENT ON CURRENT PASSPORT  
REQUEST IN THE DEMOCRATIC REPUBLIC OF THE CONGO

Cher Monsieur Ambila Eyidi

KINSHASA— En réponse à votre demande récente de passport, nous avons le regret de vous annoncer qu'après l'investigation sur votre identité selon l'information fournie à notre ambassade à Washington D. C aux Etats Unis d'Amerique, votre demande de passport a été rejetée'. Nos dossiers n'indiquaient aucune trace de votre origine ou de votre certificat de naissance en République Démocratique du Congo (RDC). Par manque de traces et de preuve d'identité', Nous vous déclinons ainsi toute pétition de passport ou autres titres de voyage à l'ambassade de la RDC aux USA.

*KINSHASA—République démocratique du Congo (RDC)  
Ministre des affaires étrangères et de la coopération internationale  
Cabinet du Ministre des affaires étrangères et de la coopération internationale  
Kinshasa Gombe'  
Léonard She Okitundu  
Fait à Kinshasa le 24 Novembre 2018*



**The Democratic Republic of the Congo**



**Certification of Translation**

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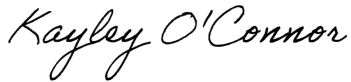
**DATE: 5/7/2025**

I, Kayley O'Connor, Language Link Project Manager, certify on behalf of Language Link, a professional Language Service Provider, that the following document(s):

- DRC-MINISTER OF FOREIGN AFFAIRS STATEMENT- PASSPORT REQUEST- French.pdf
- Eyidi Ambila DRC Embassy signed Form [IMG\_20181127].jpg

was/were completed by a professional linguistic team in the following language pairs:

- French(European)>English

A handwritten signature in black ink that reads "Kayley O'Connor".

---

(Project Manager Signature)

**5/7/2025**

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(Date)

# EXHIBIT C



Request No.

L0135501

DEMOCRATIC REPUBLIC OF THE CONGO  
Ministry of Foreign Affairs  
PASSPORT REQUEST FORM

☐ ORDINARY ☐ SERVICE ☐ DIPLOMATIC

## TO BE ATTACHED TO THIS FORM

(in 2 parts: the original + photocopy)

- ☐ 1. Declaration in lieu of nationality certificate\*  
☐ 2. Criminal Record Extract\*  
☐ 3. Photocopy of ID Card\*

## SPECIFIC CASE

- Parental authorization (for minors)  
 - Favorable opinion from specialized services  
 ordinary passport

Surname: AMBILAPost-surname: EYIDI

Given name: \_\_\_\_\_

Place of birth: KINSHASADate of birth:                     Sex: MALEMarital status: MARRIED

(Married, Single, Widow(er), Divorced)

Profession: SUPERVISORFull residential address:                     Eye color: BROWNHeight: 5 ft. 9 in.

Distinguishing feature: \_\_\_\_\_

Father's surname: AMBILAFather's post-surname: MULUMEFather's given name: VICTORMother's surname: MUTOMBOMother's post-surname: MBALAYE

Mother's given name: \_\_\_\_\_

Ethnic group: LULUAPlace of origin: KAYAYA NSAMPITerritory: DIBAYASector: DIBATAYIProvince: KASAI CENTRAL (FORMERLY KASAI OCCIDENTAL)Nationality of origin: ZAIRIANCurrent nationality: ZAIRIAN / CONGOLESE

\*Documents to be presented when requesting a favorable opinion

I certify that this information is truthful and accurate.

Request date: June 2, 2020

NOTE: BOX RESERVED FOR ADMINISTRATION  
 VOTER OR IDENTIFICATION CARD NO.

SIGNATURE OF THE APPLICANT (Do not go  
 outside the box)

RECEIPT NOTE

Name: \_\_\_\_\_

REPUBLICUE DEMOCRATIQUE DU CONGO



# FORMULAIRE DE DEMANDE DE PASSEPORT

☐ **DIPLOMATIQUE**

Nom :

**Certification of Translation**

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**DATE: 5/7/2025**

I, James D. Kipp, Language Link Project Manager, certify on behalf of Language Link, a professional Language Service Provider, that the following document(s):

- Ambila Eyidi passport application.docx

was completed by a professional linguistic team in the following language pairs:

- French>English



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(Project Manager Signature)

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**Wednesday, May 7, 2025**

(Date)