

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

NIZAR TRABELSI,)	
)	
Petitioner-Plaintiff,)	
)	
v.)	Civil Action No. 1:24-cv-01509
)	
JEFFREY CRAWFORD, et al.,)	
)	
Respondents-Defendants.)	

DEFENDANT JEFFREY CRAWFORD’S
ANSWER TO PETITION FOR WRIT OF HABEAS CORPUS &
COMPLAINT FOR INJUNCTIVE RELIEF AND
AFFIRMATIVE DEFENSES THERETO

Respondent-Defendant Jeffrey Crawford (“Crawford” or “Defendant”), by counsel, submits the following as his Answer and Affirmative Defenses to the Petition for Writ of Habeas Corpus & Complaint for Injunctive Relief (“Complaint”) filed by Petitioner-Plaintiff Nizar Trabelsi (“Trabelsi” or “Plaintiff”):

1. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 of the Complaint, and therefore, denies them.
2. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 2 of the Complaint, and therefore, denies them. The allegations in the second sentence of Paragraph 2 refer to a public court record that speaks for itself and Crawford denies any allegations that are inconsistent therewith.
3. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 of the Complaint, and therefore, denies them.
4. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the Complaint, and therefore, denies them. To the extent the

allegations in Paragraph 4 refer to a public court record, that public court record speaks for itself, and Crawford denies any allegations that are inconsistent therewith.

5. The allegations in Paragraph 5 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 5 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 5 that are inconsistent therewith.

6. The allegations in the first sentence of Paragraph 6 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the second and third sentences of Paragraph 6, and therefore, denies them. To the extent Paragraph 6 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 6 that are inconsistent therewith.

7. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 7 of the Complaint, and therefore, denies them. The allegations in the second sentence of Paragraph 7 constitute argument and/or call for a legal conclusion to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

8. The allegations in Paragraph 8 of the Complaint constitute argument to which no response is required. To the extent a response is necessary, Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 of the Complaint, and therefore, denies them. To the extent Paragraph 8 refers to written materials, those

written materials speak for themselves, and Crawford denies any allegations in Paragraph 8 that are inconsistent therewith.

9. The allegations in Paragraph 9 of the Complaint constitute argument to which no response is required. To the extent a response is necessary, Crawford admits that Trabelsi is being held in administrative segregation due to his classification as a “high” custody level detainee. Crawford denies the remaining allegations in Paragraph 9.

10. Crawford denies the allegations in Paragraph 10 of the Complaint as stated. In further response to Paragraph 10 of the Complaint, Crawford states that Trabelsi is being held in administrative segregation due to his classification as a “high” custody level detainee. Consistent with the policy for all detainees classified as “high” custody level, Trabelsi is placed in restraints when outside of his cell, is not permitted to spend time in common areas, is given segregated exercise time, cannot participate in group chapel activities, and does not have access to a television or newspapers for security reasons. In further response to Paragraph 10, Crawford states that Trabelsi is given the opportunity to shower every day and given daily segregated exercise time of two hours a day in an outdoor area that is covered, but Trabelsi often declines recreation time. Crawford further states that Trabelsi has access to a digital law library through a computer without internet access but has declined access to that computer, has access to leisure reading materials, has access to full time chaplains for his religious needs, and has been given a prayer rug. In further response to Paragraph 10, Crawford states that Trabelsi has only requested that an imam visit him on one occasion, on July 3, 2024, but that request was denied by ICE due to security concerns, and the Farmville Detention Center does not have any records indicating that any religious materials have been confiscated from Trabelsi. Crawford further states that Trabelsi’s cell measures eight feet by sixteen feet and has a window in the door that is directly across a hallway from a window

to the outside, allowing Trabelsi to look outdoors if he so chooses. Crawford further states that the overhead lights in Trabelsi's cell are turned off at night and that throughout the night a 15-watt night light is illuminated. In further response to the allegations in Paragraph 10 of the Complaint, Crawford states that per ICE, Trabelsi's phone contact is only with preapproved contacts, who do not include the woman he claims is his religious wife or that woman's children because Trabelsi has previously used contact with those individuals to communicate with known terrorists and to threaten witnesses. Moreover, Trabelsi's phone privileges are limited to a four-hour window from 8 a.m. to 12 p.m. every day because of records showing that Trabelsi misused his phone privileges, including using other detainees' identities to make phone calls he was otherwise prohibited from making. Crawford further states that since July 2023, Trabelsi has made over 2,900 allowed phone calls. Crawford further states that all of Trabelsi's incoming and outgoing mail is transmitted without review to ICE for approval to be sent or received for security reasons, and Farmville Detention Center does as ICE directs. Crawford denies any remaining allegations in Paragraph 10.

11. The allegations in Paragraph 11 of the Complaint constitute argument to which no response is required. To the extent a response is necessary, Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11 of the Complaint, and therefore, denies them.

12. The allegations in Paragraph 12 of the Complaint constitute argument to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

13. The allegations in Paragraph 13 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 13 refers to written materials, those

written materials speak for themselves, and Crawford denies any allegations in Paragraph 13 that are inconsistent therewith.

14. The allegations in Paragraph 14 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 14 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 14 that are inconsistent therewith.

15. The allegations in Paragraph 15 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 15 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 15 that are inconsistent therewith.

16. The allegations in Paragraph 16 constitute argument to which no response is required. To the extent a response is necessary, Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 of the Complaint, and therefore, denies them.

JURISDICTION AND VENUE

17. Subject to his affirmative and other defenses, Crawford does not contest subject matter jurisdiction.

18. Subject to his affirmative and other defenses, Crawford does not contest venue.

19. The allegations in Paragraph 19 of the Complaint call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

PARTIES

20. In response to Paragraph 20 of the Complaint, Crawford admits that Trabelsi is currently detained at the Farmville Detention Center. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 20 and, therefore, denies them.

21. In response to Paragraph 21 of the Complaint, Crawford admits that he is employed by Abyon LLC as the Director of the Farmville Detention Center and that he oversees the administration and management of the Farmville Detention Center in that capacity. Crawford further states that Abyon LLC is a private company and is not a federal, state, or local agency. Rather, Abyon LLC provides services to United States Immigration and Customs Enforcement (“ICE”) under contracts. Crawford admits that he is the immediate custodian of the individuals detained at the facility and understands that he is sued in his official capacity.

22. The allegations in Paragraph 22 of the Complaint are directed to a different defendant, so no response from Crawford is required. To the extent a response is necessary, on information and belief, Crawford admits the allegations in Paragraph 22.

23. The allegations in Paragraph 23 of the Complaint are directed to a different defendant, so no response from Crawford is required. To the extent a response is necessary, on information and belief, Crawford admits the allegations in Paragraph 23.

24. The allegations in Paragraph 24 of the Complaint are directed to a different defendant, so no response from Crawford is required. To the extent a response is necessary, on information and belief, Crawford admits the allegations in Paragraph 24.

STATEMENT OF FACTS

Background

25. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25 of the Complaint, and therefore, denies them.

26. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26 of the Complaint, and therefore, denies them.

27. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27 of the Complaint, including footnote 1, and therefore, denies them.

28. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 28 of the Complaint, and therefore, denies them. The allegations in the second sentence of Paragraph 28 constitute argument to which no response is required. To the extent a response is necessary, Crawford lacks knowledge or information to form a belief as to the truth of the allegations in the second sentence of Paragraph 28, and therefore, denies them.

29. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29 of the Complaint, and therefore, denies them.

30. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30 of the Complaint, and therefore, denies them.

31. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31 of the Complaint, and therefore, denies them. To the extent the allegations in Paragraph 31 refer to a public court record, that public court record speaks for itself, and Crawford denies any allegations that are inconsistent therewith.

Mr. Trabelsi's Extradition from Belgium to the United States

32. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32 of the Complaint, and therefore, denies them.

33. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33 of the Complaint, and therefore, denies them. To the extent Paragraph 33 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 33 that are inconsistent therewith.

34. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34 of the Complaint, and therefore, denies them. To the extent Paragraph 34 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 34 that are inconsistent therewith.

35. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35 of the Complaint, and therefore, denies them. To the extent Paragraph 35 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 35 that are inconsistent therewith.

36. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36 of the Complaint, and therefore, denies them.

37. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37 of the Complaint, and therefore, denies them.

38. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38 of the Complaint, and therefore, denies them.

39. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39 of the Complaint, and therefore, denies them.

40. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40 of the Complaint, and therefore, denies them.

41. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41 of the Complaint, and therefore, denies them. To the extent Paragraph 41 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 41 that are inconsistent therewith.

Mr. Trabelsi's Prolonged Pre-Trial Detention and Belgium's First Request For His Return

42. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42 of the Complaint, and therefore, denies them.

43. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43 of the Complaint, and therefore, denies them. To the extent Paragraph 43 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 43 that are inconsistent therewith.

44. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44 of the Complaint, and therefore, denies them.

45. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45 of the Complaint, and therefore, denies them. To the extent Paragraph 45 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 45 that are inconsistent therewith.

46. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46 of the Complaint, and therefore, denies them. To the extent Paragraph 46 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 46 that are inconsistent therewith.

47. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 47 of the Complaint, and therefore, denies them. To the extent Paragraph 47 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 47 that are inconsistent therewith.

Mr. Trabelsi's Acquittal, Transfer to ICE Custody, and Placement in Removal Proceedings, and Belgium's Second Request for His Return

48. In response to Paragraph 48 of the Complaint, Crawford admits that Trabelsi was transferred to the Farmville Detention Center on July 17, 2023. Crawford lacks information or knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 48 of the Complaint, and therefore, denies them.

49. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49 of the Complaint, and therefore, denies them. To the extent Paragraph 49 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 49 that are inconsistent therewith.

50. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50 of the Complaint, and therefore, denies them. To the extent Paragraph 50 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 50 that are inconsistent therewith.

51. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51 of the Complaint, and therefore, denies them. To the extent Paragraph 51 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 51 that are inconsistent therewith.

52. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52 of the Complaint, including those set forth in footnote 2, and

therefore, denies them. To the extent Paragraph 52, including footnote 2, refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 52 that are inconsistent therewith.

53. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 53 of the Complaint, and therefore, denies them.

54. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54 of the Complaint, and therefore, denies them. To the extent Paragraph 54 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 54 that are inconsistent therewith.

55. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55 of the Complaint, and therefore, denies them.

56. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56 of the Complaint, and therefore, denies them. To the extent Paragraph 56 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 56 that are inconsistent therewith.

Mr. Trabelsi's Solitary Confinement in ICE Custody

57. Crawford admits the allegations in Paragraph 57 of the Complaint. In further response to Paragraph 57, Crawford states that Trabelsi was moved to administrative segregation after Crawford and the staff at the Farmville Detention Center learned of Trabelsi's prior criminal history, his prior history of violence and infractions at other facilities, and his prior history of using outside contact to intimidate detention facility staff and witnesses. Crawford further states that Trabelsi's conduct at the Farmville Detention Center has mirrored his prior conduct at other

facilities, including behavior sought to evade restrictions placed on him, threats to Farmville Detention Center staff, and attempts to manipulate other detainees.

58. Crawford admits the allegations in Paragraph 58 of the Complaint and states that the actions described therein were taken at the direction of ICE. To the extent Paragraph 58 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 58 that are inconsistent therewith.

59. Crawford admits the allegations in Paragraph 59 of the Complaint and states that the actions described therein were taken at the direction of ICE. To the extent Paragraph 59 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 59 that are inconsistent therewith.

60. Crawford admits the allegations in Paragraph 60 of the Complaint and states that the actions described therein were taken at the direction of ICE. To the extent Paragraph 60 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 60 that are inconsistent therewith.

61. In response to the allegations in Paragraph 61 of the Complaint, Crawford states that for the first 35 days that Trabelsi was housed in administrative segregation, the measures surrounding his “high” level custody classification were reviewed by ICE every seven days and were reviewed by ICE every 10 days thereafter. To the extent Paragraph 61 refers to written materials, those materials speak for themselves, and Crawford denies any allegations in Paragraph 61 that are inconsistent therewith.

62. The allegations in Paragraph 62 refer to written materials that speak for themselves and Crawford denies any allegations that are inconsistent therewith.

63. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 63 of the Complaint, and therefore, denies them. The remaining allegations in Paragraph 63 refer to written materials that speak for themselves and Crawford denies any allegations that are inconsistent therewith.

The Highly Restrictive Conditions of Mr. Trabelsi's Solitary Confinement

64. The allegations in Paragraph 64 of the Complaint call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

Physical Confinement

65. Crawford denies the allegations in Paragraph 65 of the Complaint. In further response to Paragraph 65 of the Complaint, Crawford states that Trabelsi is given the opportunity to shower every day and given daily segregated exercise time of two hours a day in an outdoor area that is covered, but Trabelsi often declines recreation time. Crawford further states that Trabelsi's cell measures eight feet by sixteen feet and has a window in the door that is directly across a hallway from a window to the outside, allowing Trabelsi to look outdoors if he so chooses. Crawford further states that the overhead lights in Trabelsi's cell are turned off at night and that throughout the night a 15-watt night light is illuminated.

66. Crawford admits the allegations in Paragraph 66 of the Complaint. In further response to Paragraph 66, Crawford states that Trabelsi is being held in administrative segregation due to his classification as a "high" custody level detainee. Consistent with the policy for all detainees classified as "high" custody level, Trabelsi is placed in restraints when outside of his cell.

67. Crawford denies the allegations in Paragraph 67 of the Complaint as stated. In further response to Paragraph 67 of the Complaint, Crawford states that the air conditioning unit

in the restricted housing unit in which Trabelsi resides was repaired on March 25, 2024, following a complaint that it was warm. That day, it was a high of 54 degrees Fahrenheit. The air conditioning unit was also repaired on two separate occasions in August 2024 when the temperature was in the 80s outside. Otherwise, the air conditioning unit in Trabelsi's housing unit has been functional. Crawford further states that Trabelsi often wears additional layers of clothing that are not required to be worn by detainees.

Isolation

68. Crawford denies the allegations in the first sentence of Paragraph 68 of the Complaint as stated. In response to the second and third sentence of Paragraph 68, Crawford states that Trabelsi's phone contact is only with preapproved contacts, the list of which has been provided to the Farmville Detention Center by ICE, and his phone privileges are limited to a four-hour window from 8 a.m. to 12 p.m. every day because of his misuse of his phone privileges in the past. Crawford further states that all of Trabelsi's requests regarding telephone use and mailings are transmitted to ICE and the Farmville Detention Center does as ICE directs.

69. The allegations in Paragraph 69 of the Complaint refer to written materials that speak for themselves, and Crawford denies any allegations that are inconsistent therewith.

70. The allegations in Paragraph 70 of the Complaint refer to written materials that speak for themselves, and Crawford denies any allegations that are inconsistent therewith.

71. The first two sentences of Paragraph 71 of the Complaint refer to written materials that speak for themselves, and Crawford denies any allegations that are inconsistent therewith. In response to the third sentence of Paragraph 71, Crawford states that Trabelsi's phone contact is only with preapproved contacts, the list of which has been provided to the Farmville Detention Center by ICE. Crawford further states that all of Trabelsi's requests regarding telephone use are

transmitted to ICE and the Farmville Detention Center does as ICE directs. Crawford denies any remaining allegations in Paragraph 71.

72. Crawford admits the allegations in Paragraph 72 of the Complaint. In further response to Paragraph 72, Crawford states that all of Trabelsi's requests regarding telephone use are transmitted to ICE and the Farmville Detention Center does as ICE directs.

73. In response to Paragraph 73 of the Complaint, Crawford admits that Trabelsi is not given access to facility-issued tablet computers as they can be used to make telephone calls. In further response to Paragraph 73, Crawford states that on one occasion, Trabelsi was mistakenly provided access by staff to a facility-issued tablet computer, which he used to contact his alleged wife in Belgium for several hours. Crawford denies the remaining allegations in Paragraph 73 as stated.

74. In response to Paragraph 74 of the Complaint, Crawford states that Trabelsi is allotted two hours of recreation time each day at a different time than other detainees because of his classification as a "high" level custody detainee and that on only very rare occasions is the outdoor recreation space unavailable due to inclement weather as the space is outdoors but covered. In fact, Trabelsi has used his recreation time during inclement weather several times. Moreover, Crawford states that oftentimes, Trabelsi declines his recreation time altogether. In further response to the allegations in Paragraph 74, Crawford states that Trabelsi's cell is located at the end of a row of cells in the restricted housing unit and he is not permitted access to the common area of the restricted housing unit because of his classification as a "high" level custody detainee. Crawford further states that Trabelsi was previously in the first cell of that same row of cells, which was located closest to the officer station and common area of the restricted housing unit, but that he would attempt to communicate with and manipulate other detainees and threaten

the officers at the station and was relocated to the last cell in the row as a result. Crawford denies any remaining allegations in Paragraph 74 of the Complaint.

75. Crawford admits the allegations in Paragraph 75 of the Complaint.

76. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76 of the Complaint concerning his restrictions during his pre-trial detention, and therefore, denies them. To the extent Paragraph 76 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 76 that are inconsistent therewith. In further response to Paragraph 76, Crawford states that Trabelsi's requests regarding telephone use and mailings are transmitted to ICE and the Farmville Detention Center does as ICE directs.

Access to Reading Materials and Other Media

77. In response to the first two sentences of Paragraph 77 of the Complaint, Crawford admits that Trabelsi is not allowed access to newspapers because of his classification as a "high" custody level detainee as newspapers can be used to transmit coded messages between detainees. In further response to the first two sentences of Paragraph 77, Crawford states that Trabelsi has access to leisure reading material in the form of softbound books found on a book cart in the housing unit in which he resides, but he has never requested them. Crawford further states in response to the first two sentences of Paragraph 77 that there are no magazines available to any detainees in the Farmville Detention Facility. Crawford lacks information or knowledge sufficient to form a belief as to the truth of the allegations in the last sentence of Paragraph 77, and therefore, denies them.

78. In response to the first sentence of Paragraph 78 of the Complaint, Crawford states that Trabelsi has access to a digital law library through a computer without internet access but has

declined access to that computer. In response to the second sentence of Paragraph 79 of the Complaint, Crawford states that on information and belief, Trabelsi is fluent in both written and oral French and English, and Trabelsi has communicated with Farmville Detention Center staff in both written and verbal English.

79. In response to Paragraph 79 of the Complaint, Crawford states that all of Trabelsi's incoming and outgoing mail is transmitted without review to ICE for approval to be sent or received for security reasons, and Farmville Detention Center does as ICE directs.

80. In response to the first two sentences of Paragraph 80 of the Complaint, Crawford states that because of his classification of a "high" custody level detainee, he is not provided access to television. Crawford further states that Trabelsi was previously housed in the first cell in the row of cells in the housing unit where he currently resides, which was located closest to the officer station and the common area of the housing unit, but that he would attempt to communicate with and manipulate other detainees and threaten the officers at the station and was relocated to the last cell in the row as a result. Crawford admits the allegations in the third sentence of Paragraph 80. In response to the fourth sentence of Paragraph 80, Crawford states that detainees' access to television depends on their custody level classifications. Crawford denies any remaining allegations in Paragraph 80.

Religious Observance

81. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81 of the Complaint, and therefore, denies them.

82. In response to the first sentence of Paragraph 82 of the Complaint, Crawford states that because of his classification as a "high" level custody detainee, Trabelsi cannot participate in group chapel activities. Crawford lacks knowledge or information sufficient to form a belief as to

the truth of the allegations in the second sentence of Paragraph 82 of the Complaint, and therefore, denies them.

83. In response to Paragraph 83 of the Complaint, Crawford states that Trabelsi has only requested that an imam visit him on one occasion, on July 3, 2024, but that request was denied by ICE due to security concerns.

84. Crawford denies the allegations in the first sentence of Paragraph 84 of the Complaint as stated. In further response to the first sentence of Paragraph 84, Crawford states that Trabelsi has never requested any other religious texts other than the Quran. Crawford lacks information or knowledge sufficient to form a belief as to the truth of the allegations in the second sentence of Paragraph 84 of the Complaint, and therefore, denies them.

Medical Conditions

85. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85 of the Complaint, and therefore, denies them.

86. In response to Paragraph 86 of the Complaint, Crawford denies that Trabelsi has been subjected to “extreme” solitary confinement while at the Farmville Detention Center. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 86 of the Complaint, and therefore, denies them.

87. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87 of the Complaint, and therefore, denies them.

88. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88 of the Complaint, and therefore, denies them.

89. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89 of the Complaint, and therefore, denies them.

90. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90 of the Complaint, and therefore, denies them.

91. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91 of the Complaint, and therefore, denies them.

Administrative Complaints

92. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92 of the Complaint, and therefore, denies them. To the extent Paragraph 92 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 92 that are inconsistent therewith.

93. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93 of the Complaint, and therefore, denies them. To the extent Paragraph 93 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 93 that are inconsistent therewith.

94. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94 of the Complaint, and therefore, denies them.

CLAIMS

COUNT ONE

Violation of the United States-Belgium Extradition Treaty and Diplomatic Notes

95. The allegations in Paragraph 95 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 95 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 95 that are inconsistent therewith.

96. The allegations in Paragraph 96 of the Complaint refer to written materials, which speak for themselves, and Crawford denies any allegations in Paragraph 96 that are inconsistent therewith. To the extent Paragraph 96 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 96 that are inconsistent therewith.

97. The allegations in Paragraph 97 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 97 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 97 that are inconsistent therewith. To the extent Paragraph 97 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 97 that are inconsistent therewith.

98. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 98 of the Complaint, and therefore, denies them. To the extent Paragraph 98 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 98 that are inconsistent therewith.

99. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 99 of the Complaint, and therefore, denies them.

100. The allegations in Paragraph 100 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 100 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 100 that are inconsistent therewith. To the extent Paragraph 100 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 100 that are inconsistent therewith.

COUNT TWO
Violation of the Principle of Specialty Under
Article 15 of the United States-Belgium Extradition Treaty

101. The allegations in Paragraph 101 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 101 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 101 that are inconsistent therewith. To the extent Paragraph 101 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 101 that are inconsistent therewith.

102. The allegations in Paragraph 102 of the Complaint refer to written materials, which speak for themselves, and Crawford denies any allegations in Paragraph 102 that are inconsistent therewith. To the extent Paragraph 102 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 102 that are inconsistent therewith.

103. The allegations in Paragraph 103 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 103 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 103 that are inconsistent therewith. To the extent Paragraph 103 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 103 that are inconsistent therewith.

104. The allegations in Paragraph 104 of the Complaint constitute argument and/or call for a legal conclusion to which no response is required. To the extent a response is necessary, Crawford lacks knowledge or information sufficient to form a belief as to the truth of the

allegations in Paragraph 104, and therefore, denies them. To the extent Paragraph 104 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 104 that are inconsistent therewith. To the extent Paragraph 104 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 104 that are inconsistent therewith.

105. The allegations in Paragraph 105 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 105 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 105 that are inconsistent therewith. To the extent Paragraph 105 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 105 that are inconsistent therewith.

106. The allegations in Paragraph 106 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 106 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 106 that are inconsistent therewith.

107. The allegations in Paragraph 107 of the Complaint constitute argument and/or call for a legal conclusion to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 107 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 107 that are inconsistent therewith. To the extent Paragraph 107 constitutes a statement of law, the law

speaks for itself, and Crawford denies any allegations in Paragraph 107 that are inconsistent therewith.

COUNT THREE
Violation of 5 U.S.C. §§ 706(2)(A)-(D)
Ultra Vires

108. The allegations in Paragraph 108 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 108 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 108 that are inconsistent therewith. To the extent Paragraph 108 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 108 that are inconsistent therewith.

109. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 of the Complaint, and therefore, denies them.

110. The allegations in Paragraph 110 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 110 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 110 that are inconsistent therewith.

111. The allegations in Paragraph 111 of the Complaint constitute argument and/or call for legal conclusions, to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 111 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 111 that are inconsistent therewith. To the extent Paragraph 111 constitutes a statement of law, the law

speaks for itself, and Crawford denies any allegations in Paragraph 111 that are inconsistent therewith.

112. The allegations in Paragraph 112 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

COUNT FOUR
Violation of the Fifth Amendment: Substantive Due Process
Unlawful Detention

113. The allegations in Paragraph 113 of the Complaint constitute argument and/or call for a legal conclusion to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 113 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 113 that are inconsistent therewith.

114. The allegations in Paragraph 114 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 114 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 114 that are inconsistent therewith. To the extent Paragraph 114 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 114 that are inconsistent therewith.

115. The allegations in Paragraph 115 of the Complaint refer to written materials, which speak for themselves, and Crawford denies any allegations in Paragraph 115 that are inconsistent therewith. To the extent Paragraph 115 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 115 that are inconsistent therewith.

116. The allegations in Paragraph 116 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 116 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 116 that are inconsistent therewith. To the extent Paragraph 116 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 116 that are inconsistent therewith.

117. The allegations in Paragraph 117 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 117 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 117 that are inconsistent therewith. To the extent Paragraph 117 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 117 that are inconsistent therewith.

118. The allegations in Paragraph 118 of the Complaint constitute argument and/or call for a legal conclusion to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

119. Crawford lacks knowledge or information sufficient to form a belief as to the truth of the allegations in the first sentence of Paragraph 119 of the Complaint, and therefore, denies them. The allegations in the second sentence of Paragraph 119 of the Complaint constitute argument to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

120. The allegations in Paragraph 120 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

COUNT FOUR
Violation of the Fifth Amendment: Substantive Due Process
Unlawful Conditions of Confinement

121. The allegations in Paragraph 121 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

122. The allegations in Paragraph 122 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations. To the extent Paragraph 122 refers to written materials, those written materials speak for themselves, and Crawford denies any allegations in Paragraph 122 that are inconsistent therewith. To the extent Paragraph 122 constitutes a statement of law, the law speaks for itself, and Crawford denies any allegations in Paragraph 122 that are inconsistent therewith.

123. The allegations in Paragraph 123 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response necessary, Crawford denies those allegations.

124. Crawford admits the allegations in Paragraph 124 of the Complaint.

COUNT FIVE
Violation of the First Amendment: Free Exercise

125. The allegations in Paragraph 125 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

126. The allegations in Paragraph 126 of the Complaint constitute argument and/or call for a legal conclusion to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

127. In response to Paragraph 127 of the Complaint, Crawford states that Trabelsi has only requested that an imam visit him on one occasion, on July 3, 2024, but that request was denied by ICE due to security concerns.

128. Crawford denies the allegations in Paragraph 128 of the Complaint.

129. In response to Paragraph 129 of the Complaint, Crawford states that because of his classification as a “high” level custody detainee, Trabelsi cannot participate in group chapel activities.

130. The allegations in Paragraph 130 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

131. The allegations in Paragraph 131 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

COUNT SIX
Violation of the Religious Freedom Restoration Act
42 U.S.C.A. § 2000bb

132. The allegations in Paragraph 132 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

133. The allegations in Paragraph 133 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

134. The allegations in Paragraph 134 of the Complaint constitute argument and/or call for legal conclusions to which no response is required. To the extent a response is necessary, Crawford denies those allegations.

PRAYER FOR RELIEF

Crawford denies that Trabelsi is entitled to the relief specified in the paragraph following Paragraph 134 of the Complaint or to any other relief, costs, fees, or damages. Crawford denies all allegations of Trabelsi's Complaint not expressly admitted herein and demands strict proof thereof. To the extent that Crawford's Answer contains any headings or subheadings used in the Complaint, such use is for convenience only and shall not constitute an admission of any kind.

AFFIRMATIVE AND OTHER DEFENSES

Having fully answered the Complaint, Crawford states the following affirmative and other defenses to Trabelsi's claims without assuming the burden of proof on any such defense that would otherwise rest with Plaintiff and reserving the right to amend, supplement or add to his responses to Plaintiff's allegations, as well as his affirmative and other defenses, as information is gathered through discovery:

1. Plaintiff's Complaint fails to state a claim against Crawford upon which relief may be granted.

2. Plaintiff is not afforded protections coextensive with those afforded to U.S. Citizens under the Fifth Amendment.

3. Plaintiff is not afforded protections coextensive with those afforded to U.S. Citizens under the First Amendment.

4. Crawford does not constitute a state actor for due process purposes.

5. Although it appears the Plaintiff is not seeking money damages at this time, to the extent he seeks money damages and/or attorneys' fees from Crawford in the future, Crawford is entitled to immunity from liability for the claims asserted in whole or in part to the same extent as the federal government under the derivative immunity doctrine, *Yearsley v. W.A. Ross Construction, Co.*, 309 U.S. 18 (1940).

6. Although it appears the Plaintiff is not seeking money damages at this time, to the extent he seeks money damages and/or attorneys' fees from Crawford in the future, Crawford is entitled to qualified immunity to any claims for damages that may be implied or requested in Plaintiff's Prayer for Relief.

7. Plaintiff is not entitled to equitable relief to the extent that he has acted with "unclean hands" relating to the subject matter of this Complaint.

8. Crawford adopts and incorporates herein any and all defenses and affirmative defenses raised by any of the other Defendants in this action to the extent such defenses and affirmative defenses are applicable and not adverse to Crawford.

9. Crawford reserves the right to amend, supplement, and change his Answer and affirmative defenses to assert any additional, provable defenses and affirmative defenses that may

arise through discovery or upon evidence adduced at trial and to withdraw any defenses and affirmative defenses asserted herein.

WHEREFORE, Defendant Crawford prays that Plaintiff's Complaint be dismissed with prejudice and that Defendant Crawford be granted such other and further relief as the Court deems appropriate.

Dated: November 8, 2024

Respectfully submitted,

/s/ Kasey L. Hoare

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