

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

KILMAR ARMANDO ABREGO GARCIA,
et al.,

Plaintiffs,

v.

KRISTI NOEM, Secretary of the Department of
Homeland Security, *et al.*,

Defendants.

Case No. 8:25-cv-02780 (PX)

NOTICE

Federal Defendants hereby provide notice that they have identified a new country for removal that has agreed to accept Petitioner: the Republic of Liberia. Although Petitioner has identified more than twenty countries that he purports to fear would persecute or torture him if he were removed there, Liberia is not on that list.

Liberia is a thriving democracy and one of the United States's closest partners on the African continent. Since its founding more than two centuries ago by American émigrés, Liberia has maintained strong connections to the United States. Indeed, Liberia named its capital, Monrovia, in honor of a U.S. president; its national language is English, the same as the country in which Petitioner has resided for the last several years; and it modeled its constitution, which has been in place since 1986 and which provides robust protections for human rights, in large part on the U.S. Constitution. Liberia also is committed to the humane treatment of refugees. This commitment is reflected in President Joseph Boakai's February 2025 Executive Order, which aimed to enhance protections for refugees and vulnerable populations in Liberia.¹

¹ President Boakai Issues Executive Order No. 144 to Enhance Support for Refugees and Vulnerable Populations in Liberia - Global News Network Liberia,
<https://gnnliberia.com/president-boakai-issues-executive-order-no-144-to-enhance-support-for-refugees-and-vulnerable-populations-in-liberia/>.

Federal Defendants have received diplomatic assurances regarding the treatment of third-country individuals removed to Liberia from the United States and are making the final necessary arrangements for Petitioner's removal. Defendants expect to provide the requisite formal notice of the new designation of Liberia to Petitioner later today. Once that notice is provided to Petitioner, Defendants will follow the procedures set forth in the policy for third-country removals previously submitted to this Court. Defendants expect to be able to effectuate removal as soon as October 31.

Dated: October 24, 2025

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

/s/ Drew C. Ensign
DREW C. ENSIGN
Deputy Assistant Attorney General
Civil Division, Office of Immigration Litigation

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on October 24, 2025, I caused to be filed the foregoing document via CM/ECF, which caused a copy to be served on all parties.

/s/ Drew C. Ensign
DREW C. ENSIGN