IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PIERRE REGINALD **BOULOS**,

Petitioner,

v.

DIRECTOR, U.S. Department of Homeland Security ("**DHS**") Immigration and Customs Enforcement ("**ICE**") Enforcement and Removal Operations ("**ERO**") **Miami Field Office**; **ACTING DIRECTOR, U.S. DHS ICE**; **SECRETARY, DHS**; **U.S. ATTORNEY GENERAL**; **ACTING DIRECTOR**, U.S. Department of Justice Executive Office for Immigration Review ("**EOIR**"); and **U.S. SECRETARY OF STATE**;

Respondents.
_______________________________________/

CASE NO.

JUDGE:

MAGISTRATE JUDGE

VERIFIED PETITION FOR A WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

COMES NOW the Petitioner, PIERRE REGINALD BOULOS, by and through undersigned counsel, and hereby brings this Petition and sues the Respondents and alleges as follows:

I. INTRODUCTION

1. The Petitioner was born in the United States and he has a colorable claim to being a United States citizen. *See* copies of City of New York Certification of Birth indicating that the Petitioner was born on March 03, 1956, in New York City, New York at Exh. 1.

2. The Petitioner is also a citizen of Haiti. *See* copy of Haiti Passport and Haiti Birth Certificate with Notes and English translation at Exh. 2.

3. The Respondents have accorded the Petitioner lawful permanent resident ("LPR") status in the United States. *See* copy of LPR card at Exh. 3.

4. On or about July 17, 2025, the DHS ICE Homeland Security Investigations ("HSI") apprehended the Petitioner and the Respondents have detained him since this apprehension. *See* ICE, "ICE arrests Haitian engaged in violence and destabilization of Haiti, in support of Department of State" (updated August 06, 2025), available at https://www.ice.gov/news /releases/ice-arrests-haitian-engaged-violence-and-destabilization-haiti-support-department.

5. The Petitioner remains in the Respondents' physical custody at the DHS ICE ERO Krome North Processing Center, an immigration detention center under the Respondents' and their agents' direct control within this district in Miami, Florida. *See id.*

6. The Petitioner respectfully requests *inter alia* that: (1) this Honorable Court issue a Writ of Habeas Corpus; (2) declare that the Respondents have violated the Non-Detention Act, 18 U.S.C. § 4001; (3) declare that the Respondents have violated the Petitioner's First and Fifth Amendment Constitutional rights; (4) declare that the Respondents have violated the APA; (5) grant a preliminary injunction and/or a temporary restraining order preventing the Respondents from relocating the Petitioner to another jurisdiction; (6) order the Respondents to release him from custody; and (7) order other relief as described herein.

7. This action arises under the United States Constitution and the Immigration and Nationality Act ("INA"), 8 U.S.C. §§ 1101 *et seq.*, as the Petitioner challenges his detention as a violation of: the First Amendment of the U.S. Constitution; the Due Process Clause of the Fifth Amendment of the U.S. Constitution; the INA and regulations thereunder; the Non-Detention Act; and the Administrative Procedure Act ("APA").

8. This Honorable Court has jurisdiction over this complaint under the Suspension Clause, U.S. Const., Art. I, § 9, cl. 2, as the Petitioner is in custody under or by color of law of the authority of the United States, and such custody violates the U.S. Constitution, laws, or treaties of the United States.

9. In addition, this Honorable Court has jurisdiction over this complaint under: 28 U.S.C. § 2241 (power to grant Writ of Habeas Corpus); the All Writs Act, 28 U.S.C. § 1651; 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 1346 (United States Defendant); and APA, 5 U.S.C. § 555(b), 5 U.S.C. § 702 (APA waiver of sovereign immunity), 5 U.S.C. § 704 (no other adequate remedy), and 5 U.S.C. § 706 (compel agency action unlawfully withheld or unreasonably delayed).

10. This Honorable Court may grant relief pursuant to 28 U.S.C. § 2241 and the All Writs Act, 28 U.S.C. § 1651.

II. VENUE

11. Venue is proper in this district under 28 U.S.C. § 1391(b), 28 U.S.C. § 1391(e)(1) (United States defendant resides in this district), 28 U.S.C. § 1391(e)(2) (cause of action arose in this district), and 28 U.S.C. § 1391(e)(4) (plaintiff resides in this district and no real property is at issue).

12. The Petitioner is in the Respondents' physical custody within this district at the Krome North Processing Center, an immigration detention center under the direct control of the Respondents and their agents. *See* 28 U.S.C. § 2241(a) (providing for habeas petitions "within [courts'] respective jurisdictions"); *Rumsfeld v. Padilla*, 542 U.S. 426, 443 (2004) ("The plain language of the habeas statute [...] confirms the general rule that for core habeas petitions

challenging physical confinement, jurisdiction lies in only one district: the district of confinement").

III. PARTIES

13. Petitioner PIERRE REGINALD BOULOS is a native of the United States who has a colorable claim to U.S. citizenship and is also a citizen of Haiti who is in the Respondents' physical custody; the Respondents, who have accorded the Petitioner LPR status, have assigned him Alien Registration No. A[redacted].

14. The Petitioner brings a suit against the Respondent DHS ICE ERO Miami Field Office Director. In this official capacity, he is responsible for the ICE Field Office with administrative jurisdiction over the Petitioner and he is a legal custodian of the Petitioner.

15. The Petitioner brings a suit against the Respondent DHS ICE Acting Director. In this official capacity, he is a legal custodian of the Petitioner.

16. The Petitioner brings a suit against the Respondent DHS Secretary. In this official capacity, she is a legal custodian of the Petitioner.

17. The Petitioner brings a suit against the Respondent Attorney General of the U.S. Department of Justice. In this official capacity, she is responsible for the EOIR, the agency that administers the immigration courts, which conducts custody redetermination hearings and removal proceedings. *See* 8 U.S.C. § 1103.

18. The Petitioner brings a suit against the Respondent Acting EOIR Director. In this official capacity, she is responsible for the EOIR, the agency that administers the immigration courts, which conducts custody redetermination hearings and removal proceedings.

19. The Petitioner brings a suit against the Respondent U.S. Secretary of State. In this official capacity, he has provided the other Respondents with a determination that provided the basis for the deportability charge that is a basis for the Petitioner's removal proceedings.

IV. CUSTODY

20. The Petitioner is in the Respondents' physical custody within this district at the Krome North Processing Center, an immigration detention center in Miami, Florida, under the direct control of the Respondents and their agents. *See* 28 U.S.C. § 2241(c) (civil habeas statute applies to individuals who are "in custody").

V. STATEMENT OF THE FACTS

21. The Petitioner was born on March 03, 1956, in the United States. *See* Exh. 1 and Exh. 2 (birth certificates and passport indicating the Petitioner was born in New York City).

22. The DHS Notice to Appear ("NTA") (Form I-862) that the Respondents served upon the Petitioner alleged that the Petitioner is not a citizen or national of the United States and that he renounced U.S. citizenship in 2008; the Respondents did not reference in the NTA nor produce a copy of a Certificate of Loss of U.S. Nationality of the United States (Form DS-4083), and the Petitioner disputes these allegations. *See* copy of NTA dated July 18, 2025, at Exh. 4.

23. In a letter to the Petitioner from the U.S. Department of State Consular Section of the U.S. Embassy in Port-au-Prince dated October 18, 2019, a consular officer explained that the consulate had "the paperwork indicating that you swore the oath of renunciation in 2008, but the Department has been unable to locate an approved Certificate of Loss of U.S. Nationality (CLN) for [the Petitioner]"; accordingly, the Petitioner indicated that the Department cancelled the Petitioner's nonimmigrant visa because he remained a U.S. Citizen according to Department records. *See* copy of Consular Letter at Exh. 5.

24. The Petitioner obtained another nonimmigrant visa, and on or about June 11, 2021, the DHS Customs and Border Protection ("CBP") inspected and admitted the Petitioner to the

United States with authorization to remain until December 16, 2021. *See* copy of Most Recent DHS I-94 at Exh. 6.

25. The NTA further indicated and the Petitioner does not dispute that the Petitioner applied for Temporary Protected Status ("TPS") on September 24, 2021, and the TPS was approved on October 31, 2022; the NTA further noted and the Petitioner does not dispute that the Petitioner re-applied for TPS on February 01, 2023, and the TPS was approved on January 12, 2024. *See* NTA at Exh. 4.

26. The NTA noted and the Petitioner does not dispute that on or about June 20, 2023, the Petitioner filed an Application to Register Permanent Residence or Adjust Status (Form I-485) seeking to adjust to LPR status as the immediate relative of a U.S. citizen. *Id.*

27. The parties agree that on or about March 26, 2024, the DHS U.S. Citizenship and Immigration Services ("USCIS") adjusted the Petitioner's status to that of an LPR as the parent of a U.S. citizen. *See* copy of LPR card indicating adjustment of status in the "IR0" category at Exh. 3.

28. On or about July 17, 2025, the DHS ICE HSI apprehended the Petitioner and the Respondents have detained him since this apprehension. *See* ICE, "ICE arrests Haitian engaged in violence and destabilization of Haiti, in support of Department of State" (updated Aug. 06, 2025).

29. In the NTA, the Respondents alleged that the Petitioner failed to disclose information on his I-485 Application about forming a political party and a referral in July 2021 for prosecution in Haiti for misusing a loan; the Petitioner disputes this allegation. *See* NTA at Exh. 4.

30. In the NTA, the Respondents further alleged that "[t]he Secretary of State has determined that your presence and activities in the United States would have serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest"; the Petitioner disputes this allegation. *See* NTA at Exh. 4.

31. The NTA charged that the Petitioner is deportable pursuant to 8 U.S.C. §§ 1227(a)(4)(C)(i) resulting from the Secretary of State determination and 1227(a)(1)(A) for inadmissibility pursuant to 8 U.S.C. § 1182(a)(6)(C)(i) at the time of his adjustment of status. *See* NTA at Exh. 4.

32. The NTA did not charge the Petitioner with removability pursuant to any criminal removal grounds or terrorist-related grounds that would render him subject to mandatory detention pursuant to 8 U.S.C. § 1226(c). *See* NTA at Exh. 4.

33. The Petitioner, through his counsel, subsequently filed a Bond Redetermination Request with the Miami Krome Immigration Court, and on or about July 31, 2015, the Miami Krome Immigration Court conducted a custody redetermination hearing pursuant to 8 C.F.R. § 1236 and denied the Petitioner's request for a change in custody status after finding he is subject to mandatory detention pursuant to 8 C.F.R. § 1003.19(h)(2)(i)(C). *See* copy of Order of the Immigration Judge at Exh. 7.

34. The Petitioner's counsel indicated that at the hearing the Immigration Judge took no testimony and relied solely upon an undated Memorandum from Secretary of State Marco Rubio. *See* copy of Memorandum for the Secretary of Homeland Security at Exh. 8.

35. The Respondent Secretary of State stated in the letter "that the activities and presence of [the Petitioner] in the United States would have potentially serious adverse foreign policy consequences for the United States" and that the Petitioner "has engaged in a campaign of violence, gang support, and trafficking weapons and drugs that has contributed to Haiti's destabilization"; the Respondent Secretary of State did not support his conclusion with any facts or references to criminal charges or investigations. *Id.*

36. The Respondent Secretary of State also failed to indicate in the Memorandum whether he provided notice of his conclusions to any members of Congress. *Id.*

37. The Petitioner's counsel also indicated that the Respondents failed to provide any attachments that the Respondent Secretary of State's Memorandum listed at Tabs 1 and 2.

38. Despite the Respondent Secretary of State's conclusions, the Petitioner has not been charged with any crimes in the United States or Haiti.

39. The Petitioner reserved the right to file an appeal of the Immigration Judge's Order to the EOIR Board of Immigration Appeals ("BIA"). *See* Order at Exh. 7.

40. At the conclusion of the custody redetermination proceedings, the Immigration Judge conducted a master calendar hearing on or about July 31, 2025. The Petitioner's counsel at the hearing has indicated that the Petitioner, through counsel, denied that he was not a native and citizen of the United States, denied that he created a political party, denied that he failed to disclose that he was referred for prosecution, and denied the removal charges. *See* NTA at Exh. 4 (allegations 1, 13, 14, 15, and removal charges).

41. The EOIR Automated Case Information System indicated on August 21, 2025, that the Petitioner's next hearing is a Master calendar hearing at 10:30 a.m. on August 26, 2025, at the Miami Krome Immigration Court.

42. The Petitioner is filing a Motion for a Preliminary Injunction and/or Temporary Restraining Order concurrent with this Petition.

VI. LEGAL BACKGROUND

A. Habeas Corpus Petition Rights and the Non-Detention Act

43. The right to file a habeas corpus petition pursuant to 28 U.S.C. § 2241 provides "a means of reviewing the legality of Executive detention." *Rasul v. Bush*, 542 U.S. 466, 474 (2004) (quoting *INS v. St. Cyr*, 533 U.S. 289, 301 (2001)).

44. Congress provided that district courts have the power to grant a writ of habeas corpus to a person who is in custody in violation of the Constitution or laws of the United States. *See* 28 U.S.C. § 2241(c)(3).

45. The Supreme Court has noted that habeas corpus review has historically played an important role in immigration cases:

> Before and after the enactment in 1875 of the first statute regulating immigration, 18 Stat. 477, [...] [habeas corpus] jurisdiction was regularly invoked on behalf of noncitizens, particularly in the immigration context. [...] In case after case, courts answered questions of law in habeas corpus proceedings brought by aliens challenging Executive interpretations of the immigration laws.

St. Cyr, 533 U.S. at 305-06.

46. "At its historical core, the writ of habeas corpus has served as a means of reviewing the legality of Executive detention, and it is in that context that its protections have been strongest." *Id.* at 301.

47. Furthermore, the Non-Detention Act provides that "[n]o citizen shall be imprisoned or otherwise detained by the United States except pursuant to an Act of Congress." 18 U.S.C. § 4001(a).

48. The INA does not authorize the detention of U.S. citizens for removal or any other purpose. *See Lyttle v. United States*, 867 F. Supp. 2d 1256, 1281-82 (M.D. Ga. 2012) (noting that it is "clearly established that an ICE officer d[oes] not have the authority to detain or deport U.S. citizens").

49. Thus, ICE detention of U.S. citizens violates the Non-Detention Act. *See Flores-Torres v. Mukasey*, 548 F.3d 708, 710 (9th Cir. 2008) ("There is no dispute that if [petitioner] is a [U.S.] citizen the government has no authority under the INA to detain him, as well as no interest in doing so, and that his detention would be unlawful under the Constitution and under the Non-Detention Act, 18 U.S.C. § 4001").

50. ICE maintains a policy that establishes procedures for investigating potential U.S. citizenship claims by individuals in ICE detention or otherwise subject to immigration enforcement activities. *See* ICE Policy No. 16001.2, "Investigating the Potential U.S. Citizenship of Individuals Encountered by ICE" (Nov. 10, 2015) ("Directive"), available at https://www.ice.gov/sites/default/files/documents/Document/2017/16001.2.pdf and unredacted copy of Directive at Exh. 9; *see also Pasquini v. Morris*, 700 F.2d 658, 663 n.1 (11th Cir. 1983) ("Although the [legacy Immigration and Naturalization Service ("INS") internal operating instruction confers no substantive right on the […] applicant, it does confer the procedural right to be considered for such status upon application").

51. The ICE Citizenship Directive states that "[i]t is ICE policy to carefully and expeditiously investigate and analyze the potential U.S. citizenship of individuals encountered by ICE. ICE officers, agents, and attorneys should handle these matters with the utmost care and highest priority[.]" ICE Citizenship Directive at *1.

52. The Directive further provides that "ICE personnel must assess the potential U.S. citizenship of an individual encountered by ICE if the individual makes or has made a claim to U.S. citizenship, as well as when certain indicia of potential U.S. citizenship, as identified in this Directive, are present in a case even when the individual does not affirmatively make a claim to U.S. citizenship." *Id.*

53. The Directive further explains that "[i]n all situations where an individual's potential U.S. citizenship requires further investigation, [ERO and HSI] personnel must consult with the Office of the Principal Legal Advisor's (OPLA) local Office of the Chief Counsel (OCC), as prescribed in this Directive." *Id.*

54. The Directive notes that "U.S. citizenship need not be shown by a preponderance of the evidence for the agency to find that there is some probative evidence of U.S. citizenship." *Id.* at *3.

55. If ICE determines that "[s]ome probative evidence indicates that the individual may be a U.S. citizen but the evidence is inconclusive," the Directive states that "ICE should not [...] arrest the individual" and "[i]f the individual is already in ICE custody, he or she should be immediately released." *Id.* at *6.

56. The Directive notes that "potential indicia" triggering the need for further investigation includes when "[t]here is some information suggesting that the individual was born in the United States [...]." Exh. 9 (unredacted Directive at *2).

B. <u>Renunciation of U.S. Citizenship</u>

57. The INA governs the process for a person to formally renounce their U.S. nationality before a U.S. diplomatic or consular officer in a foreign state at 8 U.S.C. § 1481(a)(5).

58. The Department of State Foreign Affairs Manual ("FAM") provides consular officers the procedural rules that must be followed when a United States citizen would like to renounce his or her U.S. citizenship. *See* 7 FAM 1260 (section providing detailed guidance for consular officers on renunciation procedures, documentation, necessary forms, recordkeeping requirements, and consular responsibilities to ensure the act is voluntary and informed).

59. Under 7 FAM 1262.4, the consular officer must keep a detailed written record of every interaction with the renunciant and following the renunciation must provide a signed Consular Officer's Opinion to the CA/OCS/ACS.

60. Furthermore, 7 FAM 1264 indicates that the Consular Officer should prepare 2 original signed and seal copies of the entire renunciation package and the Form DS-4083 must contain the official stamp reflecting departmental approval.

61. "Until a CLN is approved and issued, any act of expatriation, whether or not intentional, is simply an act without significance to nationality or status." *Heuer v. U.S. Sec'y of State*, 20 F.3d 424, 427 (11th Cir. 1994).

62. "[U]ntil such approval and issuance by the Department of State occurs, the United States national is recognized as such, regardless of what act of expatriation is involved, even if he wishes to disavow American nationality." *Id.*

C. **First Amendment Constitutional Rights**

63. Under the First Amendment, "Congress shall make no law [...] abridging the freedom of speech [...]." U.S. Const. amend. I.

64. The Supreme Court has noted that the First Amendment's greatest protection is for speech of public concern:

> Speech on matters of public concern is at the heart of the First Amendment's protection. [...]. The First Amendment reflects a profound national commitment to the principle that debate on public issues should be uninhibited, robust, and wide-open. [...] That is because speech concerning public affairs is more than self-expression; it is the essence of self-government. [...]. Accordingly, speech on public issues occupies the highest rung of the hierarchy of First Amendment values, and is entitled to special protection.

Snyder v. Phelps, 562 U.S. 443, 451-52 (2011) (cleaned up).

65. Speech is of public concern "when it can 'be fairly considered as relating to any matter of political, social, or other concern to the community,' or when it 'is a subject of legitimate news interest'; that is, a subject of general interest and of value and concern to the public[.]" *Id.* at 453 (quoting *Connick v. Myers*, 461 U.S. 138, 146 (1983) and *San Diego v. Roe*, 543 U.S. 77, 83-84 (2004)) (internal citations omitted).

66. "As a general matter the First Amendment prohibits government officials from subjecting an individual to retaliatory actions for engaging in protected speech." *Nieves v. Bartlett*, 587 U.S. 391, 398 (2019) (cleaned up).

67. "If an official takes adverse action against someone based on that forbidden motive, and 'non-retaliatory grounds are in fact insufficient to provoke the adverse consequences,' the injured person may generally seek relief by bringing a First Amendment claim." *Id.* (quoting *Harman v. Moore*, 547 U.S. 250, 256 (2006)).

68. The First Amendment free speech right protects both citizens and noncitizens in the United States. *See Bridges v. Wixon*, 326 U.S. 135, 148 (1945) ("Freedom of speech and press is accorded aliens residing in this country").

69. "To state a claim for First Amendment retaliation, a plaintiff must allege that he engaged in protected speech, that the official's conduct adversely affected the protected speech, and that a causal connection exists between the speech and the official's retaliatory conduct." *Echols v. Lawton*, 913 F.3d 1313, 1320 (11th Cir. 2019) (citing *Bailey v. Wheeler*, 843 F.3d 473, 480-81 (11th Cir. 2016)).

70. "[I]t is true that the Supreme Court has recognized specific categories of speech that are not protected including true threats of, or actual, violence, […] the existence of acts that fall outside of the Amendment's core protections does not wipe away safeguards for protected speech – particularly political speech." *Ercelik v. Hyde*, No. 1:25-CV-11007-AK, 2025 WL 1361543, at *11 (D. Mass May 8, 2025) (citing *Counterman v. Colorado*, 600 U.S. 66, 72 (2023).

D. <u>Due Process Constitutional Rights</u>

71. ICE detention of individuals with a substantial claim to U.S. citizenship violates the Due Process Clause. *See Kiadii v. Decker*, 423 F. Supp. 3d 18, 20 (S.D.N.Y. 2018) (detention by ICE of U.S. citizen "is a clear deprivation of constitutional rights").

72. Additionally, "[i]t is a basic principle of due process that an enactment is void for vagueness if its prohibitions are not clearly defined." *Grayned v. City of Rockford*, 408 U.S. 104, 108 (1972).

73. A law is unconstitutionally vague when "it fails to give ordinary people fair notice of the conduct it punishes, or [is] so standardless that it invites arbitrary enforcement." *Johnson v. United States*, 576 U.S. 591, 595 (2015).

74. "When it comes to First-Amendment protected speech, the Supreme Court has repeatedly said that vagueness doctrine is especially demanding." *See Khalil v. Trump*, --- F. Supp. 3d ----, 2025 WL 1514713, at *45 (D.N.J. May 28, 2025) (citations omitted) (finding that Petitioner is likely to succeed on claim that 8 U.S.C. § 1227(a)(4)(C)(i) as applied to him is vague and in violation of Due Process clause).

75. Moreover, the Due Process Clause of the Fifth Amendment provides that "[n]o person [...] [shall be] deprived of life, liberty, or property, without due process of law." U.S. Const. amend. V.

76. "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 [of the Fifth Amendment] protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

77. Immigration detention must always "bear [...] a reasonable relation to the purpose for which the individual was committed." *Demore v. Kim*, 538 U.S. 510, 527 (2003).

78. "[T]he Due Process Clause [of the Fifth Amendment] applies to all 'persons' within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent." *Id.* at 693-94 (citing *Wong Wing v. U.S.*, 163 U.S. 228 (1896)).

79. "Detention during deportation proceedings [i]s a constitutionally valid aspect of the deportation process [...] [and] the Due Process Clause does not require [the government] to employ the least burdensome means to accomplish its goal," but civil detention of noncitizens is not without limits. *Demore*, 538 U.S. at 523, 528.

80. "Specifically, civil detention cannot be punitive." *Ercelik*, 2025 WL 1361543, at *13 (citing to *Fong Yue Ting v. United States*, 149 U.S. 698, 730 (1893)).

81. "Rather than punishment, immigration detention must be motivated by the two valid regulatory goals that the government has previously argued motivate the statute: 'ensuring the appearance of aliens at future immigration proceedings and preventing damage to the community." *Ozturk v. Trump*, No. 25-CV-374, 2025 WL 1145250, at *20 (D. Vt. Apr. 18, 2025) (quoting *Zadvydas*, 533 U.S. at 690); *see also Mahdawi v. Trump*, --- F. Supp. 3d. ----.2025 WL 1243135, at *11 (D. Vt. Apr. 30, 2025) (immigration detention cannot be motivated by desire to punish speech or deter others from speaking).

82. Due process cases recognize a broad liberty interest in deportation and removal proceedings. *See Bridges*, 326 U.S. at 154 (deportation "visits a great hardship on the individual and deprives him or the right to stay and live and work in the land of freedom").

83. To determine whether a civil detention violates a detainee's due process rights, courts apply the three-part test that the Supreme Court set forth in *Mathews v. Elridge*, 424 U.S. 319, 335 (1976).

84. Procedural due process "imposes constraints on government decisions which deprive individuals of 'liberty' or 'property' interests within the meaning of the Due Process Clause of the Fifth or Fourteenth Amendment." *Id.* at 332.

85. Once a petitioner has identified a protected liberty or property interest, the Court must determine whether respondents have provided constitutionally sufficient process. *See id.* at 332-33.

86. In making this determination, the Court balances (1) "the private interest that will be affected by the official action"; (2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural

safeguards"; and (3) "the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Id.* at 335.

E. Detention and Bond

87. Even assuming *arguendo* that the Petitioner is not a U.S. citizen, Congress established a discretionary detention framework within the INA for noncitizens who are "arrested and detained" "[o]n a warrant issued by the Attorney General." 8 U.S.C. § 1226; *see also Jennings v. Rodriguez*, 583 U.S. 281, 288 (2018) ("Section 1226 generally governs the process of arresting and detaining that group of aliens pending their removal").

88. For such noncitizens, the Attorney General (1) "may continue to detain the arrested alien," (2) "may release the alien on [...] bond of at least $1,500," or (3) "may release the alien on [...] conditional parole." 8 U.S.C. §§ 1226(a)(1)-(2).

89. An arresting officer makes an initial custody determination, but a detained noncitizen has the right to request a custody redetermination hearing before an Immigration Judge. *See* 8 C.F.R. §§ 1236.1(c)(8), (d)(1); *see also Jennings*, 583 U.S. at 306 (noting that 8 C.F.R. §§ 236.1(d)(1) and 1236.1(d)(1) "provide that aliens detained under [8 U.S.C.] § 1226(a) receive bond hearings at the outset of detention").

90. "Under 8 U.S.C. § 1226(a) and its implementing regulations, a detainee may request a bond hearing before an [Immigration Judge] at any time before a removal order becomes final." *Rodriguez Diaz v. Garland*, 53 F.4th 1189, 1197 (9th Cir. 2022) (citing to 8 C.F.R. §§ 236.1(d)(1), 1003.19).

91. "The detainee maybe represented by counsel and can submit evidence in support of his claims." *Rodriguez Diaz*, 53 F.4th at 1197 (citing to 8 C.F.R. § 1003.19(b) and *Matter of Fatahi*, 26 I&N Dec. 791, 792 (BIA 2016)).

92. "If the respondent is detained," regulations require applications for Immigration Judge review of bond determinations "to the Immigration Court having jurisdiction over the place of detention." 8 C.F.R. § 1003.19(c)(1).

93. An Immigration Judge may deny bond only if the DHS "either (1) prove[s] by clear and convincing evidence that [the detained noncitizen] poses a danger to the community or (2) prove[s] by a preponderance of the evidence that [the detained noncitizen] poses a flight risk." *Hernandez-Lara v. Lyons*, 10 F.4th 19, 41 (1st Cir. 2021).

94. The sole statutory exception to 8 U.S.C. § 1226(a)'s discretionary detention framework is in the subsection titled "Detention of criminal aliens" at 8 U.S.C. § 1226(c). *But see also* 8 U.S.C. § 1225(b) (separate mandatory detention provision for certain applicants for admission) and 8 U.S.C. § 1231(a) (separate mandatory detention provision during 90-day period after completion of removal proceedings).

95. Section 1226(c) requires mandatory detention of any alien that is inadmissible pursuant to the criminal grounds at 8 U.S.C. § 1182(a)(2) or deportable pursuant to the criminal grounds at 8 U.S.C. §§ 1227(a)(2)(A)(ii), (A)(iii), (B), (C), (D), or (A)(i) on the basis of an offense where the alien has been sentenced to at least one year of imprisonment. 8 U.S.C. §§ 1226(c)(1)(A)-(C).

96. This section also provides for mandatory detention of any alien that is inadmissible pursuant to the immigration violation grounds 8 U.S.C. §§ 1182(a)(6)(A), (6)(C), or (7) and is charged with, arrested for, convicted of, admits having committed, or admits committing acts which constitute the essential elements of any burglary, theft, larceny, shoplifting, or assault of a law enforcement office offense, or any crime that results in death or serious bodily injury to another person. 8 U.S.C. § 1226(c)(1)(E).

97. Lastly, this section provides for mandatory detention of any alien that is inadmissible under the terrorist-related grounds at 8 U.S.C. § 1182(a)(3)(B) or deportable under the terrorist-related grounds at 8 U.S.C. § 1227(a)(4)(B). 8 U.S.C. § 1226(c)(1)(D).

98. Regulations provide, however, that "an immigration judge may not redetermine conditions of custody imposed by the Service with respect to [...] [a]liens described in [8 U.S.C. § 1227(a)(4)]." 8 C.F.R. § 1003.19(h)(2)(i).

99. Although a detained noncitizen may file an appeal of an Immigration Judge decision in custody redetermination proceedings pursuant to 8 C.F.R. § 1003.19(f), the BIA has held that a determination pursuant to 8 U.S.C. § 1227(a)(4) is conclusive. *See Matter of Ruiz-Massieu*, 22 I&N Dec. 833, 842 (BIA 1999); *see also* 28 U.S.C. § 2241 (no statutory exhaustion requirement); *Laing v. Ashcroft*, 370 F.3d 994, 1000 (9th Cir. 2004) (courts may waive prudential exhaustion requirement if "administrative remedies are inadequate or not efficacious, pursuit of administrative remedies would be a futile gesture, irreparable injury would result, or the administrative proceedings would be void."); *see also McClendon v. Jackson Television, Inc.*, 603 F.2d 1174, 1177 (5th Cir 1979)[1] (exhaustion not required "where an agency's exercise of authority is clearly at odds with the specific language of the statute"); *Darby v Cisneros*, 509 U.S. 137 153-54 (1993) (exhaustion not required where a review procedure exists but is not mandated by statute or regulation).

[1] In *Bonner v. Prichard*, 661 F.2d 1206, 1209 (11th Cir. 1981) (en banc), the U.S. Court of Appeals for the Eleventh Circuit adopted as binding precedent decisions of the former U.S. Court of Appeals for the Fifth Circuit handed down prior to Oct. 1, 1981.

F. Deportability Grounds

100. An LPR is a noncitizen who has "been lawfully accorded the privilege of residing permanently in the United States as an immigrant in accordance with the immigration laws[.]" 8 U.S.C. § 1101(a)(20).

101. Deporting an LPR generally requires a removal hearing before an Immigration Judge. *See* 8 U.S.C. § 1229a; 8 C.F.R. § 1240.10(a).

102. The DHS generally bears the burden of establishing deportability in removal proceedings by evidence which is clear, unequivocal, and convincing. *Woodby v. INS*, 385 U.S. 276, 286 (1966); 8 C.F.R. §1240.8(a) (burden of proof in removal proceedings).

103. The DHS always bears the burden of establishing alienage because "it is a jurisdictional matter." *Murphy v. INS*, 54 F.3d 605, 608-09 (9th Cir. 1995) (quotation marks and citation omitted).

104. The INA provides a foreign policy deportability ground for "[a]n alien whose presence or activities in the United States the Secretary of State has reasonable ground to believe would have potentially serious adverse foreign policy consequences for the United States [...]." 8 U.S.C. § 1227(a)(4)(C)(i); *but see also id.*, at § 1227(a)(4)(C)(ii) ("[t]he exceptions described in [8 U.S.C. §§ 1182(a)(3)(C)(ii) and (iii)] shall apply to deportability under [8 U.S.C. § 1227(a)(4)(C)(i)] in the same manner as they apply to inadmissibility under [8 U.S.C. § 1182(a)(3)(C)(i)]").

105. The first exception at 8 U.S.C. § 1182(a)(3)(C)(ii) provides that an official of a foreign government or purported government, or candidate for election to a foreign government during the period immediately preceding election for that office, is exempt from deportability under 8 U.S.C. § 1227(a)(4)(C)(i) "solely because of the alien's past, current, or expected beliefs,

statements, or associations, if such beliefs, statements, or associations would be lawful within the United States."

106. The second exception at 8 U.S.C. § 1182(a)(3)(C)(iii) applies to other aliens based on the "past, current, or expected beliefs, statements, or associations, if such beliefs, statements or associations would be lawful within the United States, unless the Secretary of State personally determines that the alien's admission would compromise a compelling United States foreign policy interest."

107. Determinations on applicability of 8 U.S.C. § 1227(a)(4)(C)(i) "must meet higher standards when they are based on a foreign national's 'otherwise lawful' 'beliefs, statements, or associations'." *See Khalil*, --- F. Supp. 3d ----, 2025 WL 1514713, at *6 (D.N.J. May 28, 2025) (citing to 8 U.S.C. § 1182(a)(3)(C)).

108. "Those higher standards have a procedural aspect and a substantive aspect." *Id.*

109. "As to procedure, the Secretary's determination must be (a) made by him personally and (b) reported to certain congressional leaders." *Id.* (citing to 8 U.S.C. §§ 1182(a)(3)(C)(iii), 1182(a)(C)(iv)).

110. "As to substance, the Secretary must determine that the foreign national's 'presence or activities' in the United States 'would compromise a compelling United States foreign policy interest'." *Id.* (citing to 8 U.S.C. §§ 1227(a)(4)(C)(i),1182(a)(3)(C)(iii).

111. Judge Michael E. Farbiarz recently reviewed whether 8 U.S.C. §1227(a)(4)(C) was unconstitutionally vague in *Khalil*. *See id.*, --- F. Supp. 3d ----, 2025 WL 1514713, at **8-50 (D.N.J. May 28, 2025).

112. Judge Farbiarz noted that "the Petitioner [was] likely to succeed on the merits of his claim that [8 U.S.C. § 1247(a)(4)(C)(i)], as applied to him [...] through the Secretary of State's

[foreign policy] determination, [was] vague in violation of the Due Process Clause of the Constitution." *Khalil*, --- F. Supp. 3d ----, 2025 WL 1514713, at *52 (D.N.J. May 28, 2025).

113. Moreover, Judge Farbiarz pointed out that the only other time a federal court previously reviewed 8 U.S.C. § 1247(a)(4)(C)(i) for vagueness, the court found it as unconstitutionally vague:

> Section 1227 has been meaningfully analyzed by a federal court only once – by Judge [Maryanne Trump Barry], when she sat on this Court. *See Massieu v. Reno*, 915 F. Supp. 681, 699-703 (D.N.J. 1996), *rev'd on other grounds*, 91 F.3d 416 (3d Cir. 1996).
>
> Judge Barry did not impose any interpretation on Section 1227. *See id.* at 703.
>
> Rather, she simply struck it down as unconstitutionally vague --- across the board, on its face. *See id.*

Khalil, --- F. Supp. 3d ----, 2025 WL 1514713, at *9 (D.N.J. May 28, 2025).

114. In her opinion, Judge Barry found the provision unconstitutionally vague because "[i]t simply cannot be disputed, and indeed the government does not, that the statute provides absolutely no notice to aliens as to what is required of them under the statute. *Massieu*, 915 F. Supp. at 699.

115. Judge Barry further found that "the statute also deprives aliens [..] of due process of law by denying them a meaningful opportunity to be heard." *Id.* at 703.

116. Lastly, Judge Barry found that the statute "represents an unconstitutional delegation of legislative power by which Congress eliminated the judiciary's constitutionally required function of review while abdicating its lawmaking responsibilities in favor of standardless executive discretion." *Id.* at 744.

117. Moreover, the INA provides a deportability ground for an "alien who at the time of [...] adjustment of status was within one or more of the classes of aliens inadmissible by the law existing at such time." 8 U.S.C. § 1227(a)(1)(A).

118. The INA provides an inadmissibility ground for "alien[s] who, by fraud or willfully misrepresenting a material fact, seek[s] to procure (or has sought to procure or has procured) a visa, other documentation, or admission into the United States or other benefit under the [INA]." 8 U.S.C. § 1182(a)(6)(C)(i); *see also id.* at § 1182(i) (providing for waiver of misrepresentation inadmissibility ground).

119. A noncitizen commits "fraud" under 8 U.S.C. § 1182(a)(6)(C)(i) when a noncitizen makes a false representation of a material fact with knowledge of its falsity and with the intent to deceive a U.S. government official. *See Matter of G-*, 7 I&N Dec. 161, 164 (BIA 1956).

120. Evidence of willful misrepresentation does not require an intent to deceive. *Matter of Kai Hing Hui*, 15 I&N Dec. 288, 290 (BIA 1975).

121. Moreover, a misrepresentation is material if the noncitizen is inadmissible on the true facts. *Id*, at 289.

122. In another case involving these same deportability grounds, *Khalil v. Trump*, --- F. Supp. 3d ----, 2025 WL 1649197, at **4-5 (D.N.J. June 11, 2025), the Court noted that "lawful permanent residents are virtually never detained pending removal for the sort of alleged omissions in a [LPR] application that the Petitioner is charged with here." *Id.* (referring to declarations from Kerry Doyle, Stacy Tolchin, and Ira J. Kurzban to find "as a matter of fact that it is overwhelmingly likely that the Petitioner would not be detained solely on the [LPR] application charge.").

G. <u>The APA</u>

123. Federal agencies must comply with the APA when crafting and enforcing decisions, regulations, and legislative rules. 5 U.S.C. § 553.

124. Courts have authority to review and invalidate final agency actions that are not in accordance with the law, exceed agency authority, lack substantial evidence, or are arbitrary and capricious. 5 U.S.C. § 706.

125. "A person suffering legal wrong because of agency action […] is entitled to judicial review thereof." 5 U.S.C. § 702.

126. Under the *Accardi* doctrine, agencies must follow their own rules that affect the fundamental rights of individuals, including self-imposed policies and processes that limit otherwise discretionary decisions. *See U.S. ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 266-67 (1954) (holding BIA must follow its own regulations in the exercise of discretion); *Morton v. Ruiz*, 415 U.S. 199, 235 (1974) ("Where the rights of individuals are affected, it is incumbent upon agencies to follow their own procedures").

127. Even an unpublished policy binds the agency if "an examination of the provision's language, its context, and any available extrinsic evidence" supports the conclusion that it is "mandatory rather than merely precatory." *Doe v. Hampton*, 566 F.2d 265, 281 (D.C. Cir. 1977); *see also Morton*, 415 U.S. at 235-36 (applying *Accardi* to violation of internal agency manual).

128. When agencies fail to adhere to their own policies in violation of *Accardi*, the violation is arbitrary, capricious, and contrary to law under the APA. *See Damus v. Nielson*, 313 F. Supp. 3d 317, 337 (D.D.C. 2018) ("It is clear, moreover, that [*Accardi*] claims may arise under the APA").

129. When an agency violates its own policies, it creates an assumption of prejudice. *See Montilla v. INS*, 926 F.2d 162, 167 (2d Cir. 1991) ("[W]e hold that a [noncitizen] claiming the INS has failed to adhere to its own regulations […] is not required to make a showing of prejudice before he is entitled to relief").

130. "Pursuant to the APA, a reviewing court must 'hold unlawful and set aside agency action' when that action is *ultra vires*, or 'in excess of statutory jurisdiction, authority, or limitations, or short of statutory right." *Marland v. Trump*, 498 F. Supp. 3d 624, 634 (E.D. Pa.

2020) (citing 5 U.S.C. §706(2)(C)); *see also Romero v. INS*, 39 F.3d 977, 980 (9th Cir. 1994) (holding that an immigration regulation that is inconsistent with the statutory scheme is invalid).

131. "An agency acts *ultra vires* when it 'go[es] beyond what Congress has permitted it to do.'" *Ayala Chapa v. Bondi*, 132 F.4th 796, 798-99 (5th Cir. 2025) (citing *City of Arlington v. FCC*, 569 U.S. 290, 297-98 (2013)).

132. Other courts have found that another portion of the custody and bond regulation at 8 C.F.R. § 1003.19 is *ultra vires* to the statutory provision for detention at 8 U.S.C. § 1226(a). *See Zavala v. Ridge*, 310 F. Supp. 2d 1071, 1079 (N.D. Cal. 2004) (finding that 8 C.F.R. § 1003.19(i)(2) exceeds statutory authority because it allows "back-ended approach" to permit DHS to impose mandatory detention rather than permit the immigration court to make discretionary decision under 8 U.S.C. § 1226(a)); *see also Mayo Anicaso v. Kramer*, 4:25CV3158, 2025 WL 2374224, at *5 (D. Neb. Aug. 14, 2025) (finding 8 C.F.R. § 1003.19(i)(2) *ultra vires*); *Garcia Jiminez v. Kramer*, 4:25CV3162, 2025 WL 2374223, at *5 (D. Neb. Aug. 14, 2025) (finding 8 C.F.R. § 1003.19(i)(2) *ultra vires*).

VII. CLAIMS FOR RELIEF

COUNT I

RESPONDENTS HAVE VIOLATED THE NON-DETENTION ACT

133. Petitioner BOULOS repeats and re-alleges paragraphs 1 through 132 as though fully set forth herein.

134. The Respondents have unlawfully detained Petitioner BOULOS in violation of the Non-Detention Act, which provides that "[n]o citizen shall be imprisoned or otherwise detained by the United States except pursuant to an Act of Congress." 18 U.S.C. § 4001(a).

135. The Petitioner, who was born in the United States, has a colorable claim to U.S. citizenship and the Respondents have no authority under the INA to detain the Petitioner.

COUNT II

RESPONDENTS HAVE VIOLATED THE PETITIONER'S FIRST AMENDMENT RIGHTS

136. Petitioner BOULOS repeats and re-alleges paragraphs 1 through 132 as though fully set forth herein.

137. The Respondents have unlawfully subjected Petitioner BOULOS to retaliatory actions for engaging in protected speech.

138. The Petitioner has engaged in protected speech, the Respondents' conduct has adversely affected the speech, and a causal connection exists between the speech and the retaliatory conduct. *See, e.g.,* ICE, "ICE arrests Haitian engaged in violence and destabilization of Haiti, in support of Department of State" (updated August 06, 2025) ("The United States will not allow individuals to enjoy the benefits of legal status in our country while they are facilitating the actions of violent organizations or supporting criminal terrorist organizations abroad").

COUNT III

RESPONDENTS HAVE VIOLATED THE PETITIONER'S DUE PROCESS RIGHTS

139. Petitioner BOULOS repeats and re-alleges paragraphs 1 through 132 as though fully set forth herein.

140. The Respondents have failed to provide the Petitioner with due process pursuant to the Fifth Amendment.

141. At the custody redetermination hearing, the immigration judge did not conduct an appropriate hearing to determine whether the Petitioner, who was born in the United States, was a United States citizen. *See* 18 U.S.C. § 4001(a) (Non-Detention Act providing that "[n]o citizen shall be imprisoned or otherwise detained by the United States except pursuant to an Act of Congress").

142. Additionally, the law that the Respondents relied on for justifying the Petitioner's detention, 8 U.S.C. § 1227(a)(4)(C)(i), is unlawfully vague as applied to the Petitioner in the instant matter. *See Khalil*, 2025 WL 1514713, at *56 (finding that Petitioner is likely to succeed on claim that 8 U.S.C. § 1227(a)(4)(C)(i) as applied to him is vague and in violation of Due Process clause).

143. Furthermore, 8 U.S.C. § 1227(a)(4)(C)(i) is unconstitutional as it deprives the Petitioner of an opportunity to be heard. *See Massieu*, 915 F. Supp. at 699.

144. The statute also represents an unconstitutional delegation of legislative power by which Congress eliminated the judiciary's constitutionally required function of review while abdicating its lawmaking responsibilities in favor of standardless executive discretion." *Id.* at 744.

145. Moreover, the Respondents have violated the Petitioner's Fifth Amendment rights by failing to adhere to their own Citizenship Directive policies. *See* Directive.

146. To comport with due process requirements, detention must bear a reasonable relationship to its two regulatory purposes of ensuring the appearance of noncitizens at future hearings and to prevent danger to the community pending the completion of removal. *Zadvydas*, 533 U.S. at 690-91.

147. The Petitioner is neither a flight risk nor a danger to the community.

148. Moreover, the Respondents' detention of Petitioner Boulos is punitive.

149. Here, the Petitioner's interest is substantial, as freedom from physical restraint is an interest that "lies at the heart of the liberty that the [Due Process] Clause protects." *Zadvydas*, 533 U.S. at 690.

150. The Respondents have failed to provide the Petitioner with sufficient due process. *See Mathews*, 424 U.S. at 335.

COUNT IV

APA VIOLATION

151. Petitioner BOULOS repeats and re-alleges paragraphs 1 through 132 as though fully set forth herein.

152. Assuming *arguendo* that 8 U.S.C. § 1227(a)(4)(C)(i) is not unlawfully vague, the Respondent Secretary of State's determination pursuant to 8 U.S.C. § 1227(a)(4)(C)(i) exceeds agency authority, lacks substantial evidence, and is arbitrary and capricious in violation of the APA. *See* 5 U.S.C. § 706.

153. The Respondent Secretary of State has failed to comply with the procedural and substantive aspects that 8 U.S.C. § 1227(a)(4)(C)(i) requires when an alien's past, current, or expected beliefs, statements, or associations would be otherwise lawful in the United States. *See* 8 U.S.C. §§ 1182(a)(3)(C)(ii) and (iii) (exceptions to 8 U.S.C. § 1227(a)(4)(C)(i); *see also Khalil*, 2025 WL 1514713, at *6 *describing procedural and substantive aspects to higher standards).

154. The Respondent Secretary of State failed to establish that the Respondent's presence or activities in the United States would compromise a compelling United States foreign policy interest. *See* 8 U.S.C. §§ 1227(a)(4)(C)(i) and 1182(a)(3)(C)(iii).

155. Furthermore, the Respondent Secretary of State has not established that he reported his determination to certain congressional leaders. *See* 8 U.S.C. §§ 1182(a)(3)(C)(iii) and (iv).

156. Additionally, the Respondents have determined that the Petitioner is subject to mandatory detention by unlawfully relying on a regulation, 8 C.F.R. § 1003.19(h)(2)(i), that is *ultra vires* to the mandatory detention provisions in the INA.

157. Moreover, the Respondents have violated the APA by failing to adhere to their own Citizenship Directive policies. *See* Directive.

VIII. RELIEF REQUESTED

WHEREFORE, Petitioner BOULOS prays that this Honorable Court grant the following relief:

1. Accept jurisdiction over this action.

2. Issue an Order to Show Cause pursuant to 8 U.S.C. § 2243 directing the Respondents to file a return in three days of the Order directing the Respondents to show cause why the Court should not grant a Writ of Habeas Corpus.

3. Issue a Writ of Habeas Corpus requiring the Respondents to produce the Petitioner.

4. Grant temporary and permanent injunctive relief preventing the Respondents from transferring the Petitioner to outside of this district.

5. Declare that the Respondents' detention of the Petitioner violates the First Amendment of the U.S. Constitution.

6. Declare that the Respondents' detention of the Petitioner violates the Due Process Clause of the Fifth Amendment of the U.S. Constitution.

7. Declare that the Respondent Attorney General and EOIR Acting Director have violated the APA.

8. Declare that the Respondent U.S. Secretary of State has violated the APA.

9. Grant temporary and permanent injunctive relief requiring the Respondents/Defendants to release the Petitioner from custody.

10. Award Petitioner BOULOS reasonable costs and attorney fees for bringing this action.

11. Grant such further relief as Petitioner BOULOS may request and/or this Honorable Court deems just and proper under the circumstances.

Respectfully submitted this 22nd day of August, 2025,

By: **/s/ Andrew W. Clopman**
Andrew W. Clopman, Esq.
Florida Bar No. 0087753
aclopman@clopmanlaw.com
Andrew W. Clopman, P.A.
P.O. Box 86
Fort Covington, NY 12937
Telephone: (772) 210-4337
Attorney for Petitioner Pierre Reginald Boulos

/s/ Ana Maria Candela
Ana Maria Candela, Esq.
Florida Bar No. 128856
ana@cejimmigration.com
Candela Eig Jurgens, LLC
2730 SW 3rd Avenue, Suite 501
Miami, FL 33129-2323
Telephone: (305) 722-7005
Attorney for Petitioner Pierre Reginald Boulos

VERIFICATION

Pursuant to 28 U.S.C. § 2242, undersigned counsel certifies under penalty of perjury that I am submitting this verification because I am one of the Petitioner's attorneys and I have discussed the facts within this Petition with the Petitioner's counsel in removal proceedings before Respondents. Pursuant to these discussions, I have reviewed the foregoing petition and that, to the best of my knowledge, the facts therein are true and accurate and the attachments to the petition are true and correct copies of the originals.

Respectfully submitted this 22nd day of August, 2025,

By: **/s/ Andrew W. Clopman**

Andrew W. Clopman, Esq.
Florida Bar No. 0087753
aclopman@clopmanlaw.com
Andrew W. Clopman, P.A.
P.O. Box 86
Fort Covington, NY 12937
Telephone: (772) 210-4337
Attorney for Petitioner Pierre Reginald Boulos