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February 4, 2026

VIA ECF:
Honorable Joshua D. Wolson
Judge, United States District Court
3809 United States Courthouse
601 Market Street
Philadelphia, PA 19106-1744

RE: *Andrii Plakhotniuk v. Rose, et al.*,
E.D. Pa. Civ. No. 26-cv-0473

Dear Judge Wolson:

The Petitioner, Andrii Plakhotniuk, was released on January 28, 2026, as stated by the Government in its letter dated February 3, 2026. However, Immigration and Customs Enforcement ("ICE") has placed the Petitioner under an order of supervision that requires him to report to their Philadelphia office on February 11, 2026 at 10:00 a.m. Requiring him to report so soon after his release his highly unusual. Among other things, ICE is demanding that he bring with him documentation regarding requests made to embassies or consulates for travel documents. Although the Petitioner is in temporary protected status ("TPS") as a citizen of Ukraine, and INA § 244(d)(4) [8 U.S.C. § §1254a] provides that an individual in TPS shall not be detained on the basis of the alien's immigration status, it appears that there is a real possibility that ICE will again detain him and deem him subject to removal despite his status. Moreover, the Petitioner was originally paroled into the United States based on a Uniting for Ukraine parole application that was approved prior to his arrival in the United States.

The Government continues to maintain its position in its Notice to Appear ("NTA"), Exhibit 3 to Petition, that the Petitioner was not admitted or paroled into the United States, and has not recognized that he currently possesses TPS. Based on the foregoing, the Petitioner respectfully requests that this matter be held in abeyance until after February 11, 2026, or pending a clarification of the Government's position regarding its intentions as to the Petitioner, including whether it intends to detain again on February 11, 2025, the purpose of its onerous order of supervision, and whether it stands by the allegations made in its NTA.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Francois-Ihor Mazur
Francois-Ihor Mazur
Attorney for Petitioner

Attachments

cc: Anthony St. Joseph (anthony.stjoseph@usdoj.gov)
Assistant United States Attorney

C-6-22-L.

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE

File No.: [redacted]

Name: PLAKHOTNIUK, ANDRII NMN

Date: Jan 28, 2026

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

- [x] You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.
- [x] You must surrender for removal from the United States if so ordered.
- [x] You must report in (writing) (person) to Duty officer at See I-831 on ~~01/28/2026 10:41~~ 02/11/2026 10:00AM MFL as directed.

If you are allowed to report in writing, the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

- [x] You must not change your place of residence without first securing written permission from the officer listed above.
- [x] You must not violate any local, State or Federal laws or ordinances.
- [x] You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.
- [ ] Other: *Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the U.S. Department of Homeland Security. As part of the ATD program, you will be subject to electronic monitoring and may be subject to a curfew. Failure to comply with the requirements of the ATD program will result in a redetermination of your release conditions or your arrest and detention.*

  If fitted with a U.S. Immigration and Customs Enforcement GPS tracking ankle bracelet, do not tamper with or remove the device. Under federal law, it is a crime to willfully damage or attempt to damage property of the United States. Damaging or attempting to damage the GPS tracking ankle bracelet or any of its associated equipment (including, but not limited to, the charging station, batteries, power cords, etc.) may result in your arrest, detention, and prosecution under 18 U.S.C. § 1361 and/or 18 U.S.C. § 641, each punishable by a fine, up to ten years imprisonment, or both.
- [x] See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by Immigration and Customs Enforcement.

K. Tejeda, SDDO
(Name and Title of ICE Official)

Alien's Acknowledgement of Conditions of Release under an Order of Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the English/Ukrainian language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.

8904 M. Cooke
(Signature of ICE Official Serving Order)

1-28-26
Date

X
(Signature of Alien)

I hereby cancel this order of release because:

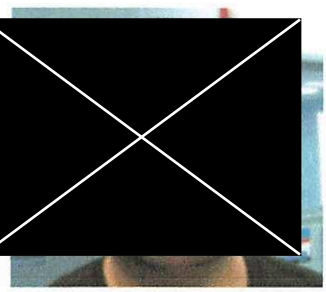
- [ ] The alien failed to comply with the conditions of release.
- [ ] The alien was taken into custody for removal.

(Signature of ICE Official Cancelling Order) Date

COPY

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE
(CONTINUATION PAGE)

Alien Name	Picture	Right Index Print
PLAKHOTNIUK, ANDRII NMN		
File Number [redacted] Date January 28, 2026		
Alien's Signature X		
Alien's Telephone Number (if any) [redacted]		
Alien's Address [redacted]		

PERSONAL REPORT RECORD

Date	Officer	Comment/Changes

Signature	Title
	DO

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE (ADDENDUM)

File No. [redacted]

Name: PLAKHOTNIUK, ANDRII NMN

Date: January 28, 2026

- [x] That you do not associate with known gang members, criminal associates, or be associated with any such activity.
- [ ] That you register in a substance abuse program within 14 days and provide ICE with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a counselor.
- [ ] That you register in a sexual deviancy counseling program within 14 days and provide ICE with written proof of such within 30 days. You must provide ICE with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.
- [ ] That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency(s) and provide ICE with written proof of such within 10 days.
- [x] That you do not commit any crimes while on this Order of Release on Recognizance.
- [ ] That you report to any parole or probation officer as required within 5 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.
- [ ] That you continue to follow any prescribed doctor's orders whether medical or psychological including taking prescribed medication.
- [x] That you provide ICE with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.
- [x] That you provide ICE with written responses from the Embassy or Consulate regarding your request.
- [x] Any violation of the above conditions will result in revocation of your employment authorization document.
- [x] Any violation of these conditions may result in you being taken into ICE custody and you being criminally prosecuted.
- [ ] Other:

null

X _____
(Signature of Alien)

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE
(OUT-PROCESSING CHECKLIST)

Sex Offenders

- ☐ Probation/Parole Officer Notified
- ☐ Registered as sex-offender as required by state statute within 7 days
- ☐ Victim/Witness Coordinator Notified
- ☐ Victim/Witness Notified
- ☐ Written Proof of Counseling

Substance Abusers

- ☐ Probation/Parole Officer Notified
- ☐ Written Proof of Counseling

All Aliens

- ☐ Probation/Parole Officer Notified
- ☒ Obtain address where living and telephone number
- ☒ Enter into IDENT FINS#: [redacted]
- ☐ NCIC Check
- ☐ Travel Document Application
- ☐ Other: null

Completed By	
Deportation Officer:	Date 01/28/2026

Concurrence By	
Supervisory Detention and Deportation Officer:	Date 01/28/2026

U.S. Department of Homeland Security **Continuation Page for Form** I-220A

Alien's Name	File Number	Date
PLAKHOTNIUK, ANDRII NMN	[redacted]	Jan 28, 2026

LOCATION OF ICE OFFICE WHICH YOU REPORT TO
---
114 North 8th ST
Philadelphia, PA 19107

2-11-26- 10.AM.

Signature	Title

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