UNITED STATES DISTRICT COURT
[EASTERN DISTRICT OF NEW YORK]

Chen Fei Pan,

Petitioner,

v.

KENNETH GENALO, *in his official capacity as New York Field Office Director, Immigration and Customs Enforcement and Removal Operations;* KRISTI NOEM, *in her official capacity as Secretary of the U.S. Department of Homeland Security*; PAMELA BONDI, *in her official capacity as Attorney General of the United States;* RAUL MALDONADO, *in his official capacity as Warden of the Metropolitan Detention Center, Brooklyn;* EXECUTIVE OFFICE FOR IMMIGRATION REVIEW,

Respondents.

Case No. 1:26-cv-622

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. Petitioner, Chen Fei Pan, is in the physical custody of Respondents at the Metropolitan Detention Center, 80 29th Street, Brooklyn, NY 11232. He now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have concluded Petitioner is subject to mandatory detention.

2. Petitioner is charged with, inter alia, having entered the United States without admission or inspection. *See* 8 U.S.C. § 1182(a)(6)(A)(i).

3. Accordingly, Petitioner seeks a writ of habeas corpus ordering immediate release from custody.

JURISDICTION

4. Petitioner is in the physical custody of Respondents. Petitioner is detained at the Metropolitan Detention Center, 80 29th Street, Brooklyn, NY 11232.

5. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause).

6. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All-Writs Act, 28 U.S.C. § 1651.

VENUE

7. Pursuant to Braden v. 30th Judicial Circuit Court of Kentucky, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Southern District, the judicial district in which Petitioner currently is detained.

8. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Eastern District of New York.

REQUIREMENTS OF 28 U.S.C. § 2243

9. The Court must grant the petition for writ of habeas corpus or order Respondents to show cause "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, Respondents must file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

10. Habeas corpus is "perhaps the most important writ known to the constitutional law . . . affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). "The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application." *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

PARTIES

11. Petitioner Chen Fei Pan is a citizen of China who has been detained by ICE since June 30, 2025, following his arrest at 26 Federal Plaza, New York, NY, 10278.

12. Respondent Kenneth Genalo is the New York Field Office Director for Immigration and Customs Enforcement, Enforcement and Removal Operations ("ERO"). In that capacity, Director Genalo exercises authority over immigration enforcement and detention

operations within the jurisdiction of the New York Field Office, including custody decisions relating to the Petitioner. Director Genalo is used in his official capacity.

13. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

14. Respondent Pamela Bondi is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review and the immigration court system it operates is a component agency. She is sued in her official capacity.

15. Respondent Raul Maldonado is the Warden of the Metropolitan Detention Center, Brooklyn, where Petitioner is currently detained. As Warden, Respondent has day-to-day custody over Petitioner and is sued in his official capacity.

16. Respondent Executive Office for Immigration Review (EOIR) is the federal agency responsible for implementing and enforcing the INA in removal proceedings.

LEGAL FRAMEWORK

17. Whenever the government restrains an individual's liberty through detention or incarceration, it assumes an affirmative obligation to ensure conditions that meet basic standards of health and safety. The Supreme Court has made clear that "when the State takes a person into its custody and holds him there against his will, the Constitution imposes upon it a corresponding duty to assume some responsibility for his safety and general well-being." *DeShaney v. Winnebago County Dep't of Soc. Servs.*, 489 U.S. 189, 199–200 (1989). This constitutional duty includes

providing individuals in custody with "food, clothing, shelter, medical care, and reasonable safety." *Id.* at 200.

18. Conditions of confinement that expose detainees to an unreasonable risk of future harm violate constitutional protections even where serious injury has not yet occurred. Under the Eighth Amendment, "reasonable safety" is a basic human need that must be furnished to those in custody. *Helling v. McKinney*, 509 U.S. 25, 33 (1993) (quoting *DeShaney*, 489 U.S. at 200). As the Supreme Court has explained, it would be illogical to deny injunctive relief to detainees who demonstrate the existence of unsafe, life-threatening conditions merely because the harm has not yet fully materialized. *Id.*

19. The Supreme Court has further recognized that exposure to conditions presenting a serious risk of illness—including the risk of contracting communicable disease—may constitute an unsafe and life-threatening condition that undermines reasonable safety. *Id.*

20. These constitutional principles apply with full force in the immigration detention context. Individuals held under civil immigration laws, including those with prior criminal histories, are civil detainees rather than criminal prisoners. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

21. Because immigration detainees are civil detainees, the source of their constitutional protection is the Fifth Amendment's Due Process Clause, which affords protections that are at least as robust as—and in many respects greater than—those provided by the Eighth Amendment. While the Eighth Amendment permits punishment so long as it is not cruel and unusual, the Fifth Amendment prohibits punishment altogether in the civil detention setting. *Bell v. Wolfish*, 441 U.S. 520, 535 n.16 (1979) ("Due process requires that a pretrial detainee not be punished.").

22. Courts have repeatedly acknowledged that civil detainees are entitled to conditions of

confinement that are superior to those imposed on individuals convicted of criminal offenses. See *Alves v. Murphy*, 530 F. Supp. 2d 380, 387 (D. Mass. 2008); *King v. Cty. of Los Angeles*, 885 F.3d 548, 557 (9th Cir. 2018); *Jones v. Blanas*, 393 F.3d 918, 933–34 (9th Cir. 2004).

23. The Due Process Clause protects civil detainees not only from conduct that rises to the level of deliberate indifference, but also from objectively unreasonable governmental action that creates a substantial risk to their health or safety. See *Kingsley v. Hendrickson*, 135 S. Ct. 2466, 2472–73 (2015); *Miranda v. Cty. of Lake*, 900 F.3d 335, 352 (7th Cir. 2018); *Gordon v. Cty. of Orange*, 888 F.3d 1118, 1120, 1122–25 (9th Cir. 2018). The Supreme Court's reasoning in *Kingsley* is not limited to excessive force claims but extends broadly to governmental conduct in the detention context, including the provision—or denial—of medical care. See *Gordon*, 888 F.3d at 1124; *Couchon v. Cousins*, 2018 WL 4189694, at *6 (D. Mass. Aug. 31, 2018) (observing that there is "much to be said" for applying *Kingsley* to conditions-of-confinement claims).

24. Finally, because civil immigration detention is governed by the Fifth Amendment rather than the Eighth Amendment, a condition of confinement violates due process where it imposes harm that meaningfully exceeds the inherent discomforts of detention and is not reasonably related to a legitimate governmental objective, or is excessive in relation to that objective. *Unknown Parties v. Johnson*, No. CV-15-00250-TUC-DCB, 2016 WL 8188563, at *5 (D. Ariz. Nov. 18, 2016), aff'd sub nom. *Doe v. Kelly*, 878 F.3d 710 (9th Cir. 2017) (citing *Bell v. Wolfish*, 441 U.S. 520, 535, 538 (1979)).

25. Therefore the only course of action that can remedy the unlawful conditions is release from the detention centers where risk mitigation is impossible.

FACTS

26. Petitioner has resided in the United States since July 16, 1999, and currently lives at 725 48th St, Brooklyn, NY 11220.

27. On information and belief, on June 30, 2025, Petitioner was arrested by ICE while reporting for a scheduled check-in at 26 Federal Plaza, New York, NY 10278. Currently, Petitioner is detained at the Metropolitan Detention Center, 80 29th Street, Brooklyn, NY 11232.

28. DHS placed Petitioner in removal proceedings before the New York Immigration Court pursuant to 8 U.S.C. § 1229a. ICE has charged Petitioner with, *inter alia*, being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) as someone who entered the United States without inspection.

29. On information and belief, in or about October 2025, Petitioner developed persistent skin rashes and submitted requests for medical attention. Despite his immediate request, Petitioner did not receive medical evaluation for approximately two months. In or about December 2025, when a physician eventually examined Petitioner, he was provided a topical ointment. The prescribed treatment failed to alleviate Petitioner's condition. After Petitioner informed detention staff that the ointment was ineffective and that his symptoms persisted, his requests for further medical care were ignored.

30. On information and belief, in or about December 2025, Petitioner became ill with cold-like symptoms and again requested medical attention. Those requests were ignored, and Petitioner was not seen by medical personnel.

31. Petitioner is employed at a restaurant in New York and maintains a stable source of income and a fixed residence.

50. According to the ICE Detainee Locator System, Petitioner is presently detained at the Metropolitan Detention Center, 80 29th Street, Brooklyn, NY 11232. A true and correct copy of the Locator search result is attached hereto as **Exhibit A**.

32. On information and belief, ICE served Petitioner with a Notice to Appear (NTA). Following his 1999 entry, Petitioner remained physically present in the United States for many years. The record reflects that Petitioner established residence in New York and lived in the United States long after the alleged entry event referenced in the NTA, further underscoring that his current detention is not incident to any ongoing border inspection or admission process. A true and correct copy of the NTA is attached hereto as **Exhibit B**.

33. Petitioner has a pending Form I-589, Application for Asylum and for Withholding of Removal, which was filed prior to his detention and remains awaiting adjudication. Petitioner has a scheduled Merits Hearing on March 13, 2026, at 1:00 p.m., and this pending application demonstrates that Petitioner is actively pursuing lawful relief from removal. A true and correct copy of the pending Form I-589 is attached hereto as **Exhibit C**.

34. On January 29, 2026, at 11:30 a.m., counsel's firm communicated with Petitioner by telephone. During this call, Petitioner reported that he had sought medical attention on two occasions while detained at the detention facility. In or about October 2025, Petitioner developed red rashes on his arms and promptly requested medical care. Despite his request, Petitioner was not seen by a medical provider for approximately two months, at which time he was prescribed a topical ointment. The prescribed treatment did not alleviate his condition. Petitioner thereafter requested additional medical assistance, but his subsequent requests were ignored. Petitioner further stated that he has been diagnosed with bipolar disorder prior to his arrest and detention, which has resulted in social isolation from other detainees. Subsequently, in or about December

2025, Petitioner became ill with cold-like symptoms and again requested medical attention. Those requests were ignored, and Petitioner was not seen by medical personnel. A true and correct copy of the call record documenting the January 29, 2026 communication between Petitioner and an attorney from Counsel's firm, Jaime Shin, is attached hereto as **Exhibit D.**

35. Upon information and belief, Petitioner's father informed counsel that Petitioner has been suffering from a diagnosed psychological disorder, namely bipolar disorder, and has not been provided appropriate mental health treatment while detained at the facility where Petitioner is currently confined. A true and correct copy of Petitioner's father's affidavit is attached hereto as **Exhibit E.**

36. Continued prolonged detention without adequate medical and mental health care poses a serious risk of further deterioration of Petitioner's condition.

CLAIMS FOR RELIEF

COUNT I

Violation of the Fifth Amendment Due Process Clause

37. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

38. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

39. Petitioner has a fundamental interest in liberty and being free from official restraint.

40. Petitioner is a civil detainee held by Respondents pursuant to immigration

authority. Civil immigration detention is non-punitive in nature, and any such detention must bear a reasonable relationship to a legitimate governmental purpose

41. Petitioner has been detained for approximately six months without a meaningful opportunity to secure release, or individualized determination that his continued detention remains reasonable or necessary.

42. As detention becomes prolonged, due process requires heightened procedural and substantive protections to ensure that continued confinement does not become arbitrary or punitive in effect.

43. Respondents' continued detention of Petitioner has become unreasonable and excessive in relation to any legitimate governmental purpose, particularly where Petitioner poses no demonstrated danger and no individualized finding has been made that his prolonged detention is necessary.

44. Petitioner's prolonged detention has been accompanied by a failure to provide adequate medical and mental health care, including delays in treatment, ignored requests for medical assistance, and the deterioration of Petitioner's pre-existing bipolar disorder.

45. The denial of timely and adequate medical and mental health care has exacerbated the punitive nature of Petitioner's confinement, rendering his continued detention inconsistent with due process protections afforded to civil detainees.

46. Petitioner's detention violates the Due Process Clause because ICE re-detained Petitioner at a routine check-in without providing any of the procedural safeguards required when the government seeks to deprive an individual of liberty. The Supreme Court's framework in *Mathews v. Eldridge*, 424 U.S. 319 (1976), governs this analysis. Under *Mathews*, courts balance three considerations: the weight of the private interest at stake, the risk of erroneous

deprivation under existing procedures and the value of additional safeguards, and the government's interest in avoiding additional procedures. Each factor strongly favors Petitioner and demonstrates that the detention is unconstitutional.

47. Even if the statutory question were settled, Petitioner's detention violates the Constitution. The Due Process Clause prohibits the government from depriving a person of physical liberty without procedural safeguards. Detention at a routine check-in, imposed without notice, without an individualized assessment of risk, and without any opportunity to be heard, is fundamentally incompatible with constitutional requirements.

COUNT II
Violation of the Rehabilitation Act

48. Under Section 504 of the Rehabilitation Act, federal agencies must provide reasonable accommodations to individuals with disabilities 29 U.S.C. § 794(a); 6 C.F.R. § 15.30.

49. In light of Petitioner's medical conditions and special vulnerability to his pre-existing mental disorder, Petitioner has disabilities with the meaning of the Act.

50. Given Petitioner's disabilities, his heightened medical and psychological vulnerability, and the failure of the detention facility to provide reasonable accommodation or adequate care, continued detention effectively denies Petitioner the protections guaranteed by the Rehabilitation Act. Under these circumstances, release is the only reasonable accommodation

PRAYER FOR RELIEF

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

a. Assume jurisdiction over this matter;

b. Order that Petitioner shall not be transferred outside the New York while this habeas petition is pending;

c. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;

d. Declare that Petitioner's detention is unlawful;

e. Order Petitioner's immediate release from custody; or, in the alternative, grant such other relief as this Court deems just, proper, and appropriate.

f. Order that, upon release, Respondents shall not impose any electronic monitoring, location-tracking device, GPS ankle bracelet, or any other form of surveillance-based conditions on Petitioner; and

g. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law.

Dated: February 4, 2026

LAW OFFICE OF NG & WASSERMAN PLLC

/s/ Jed S. Wasserman

By: Jed Wasserman
LAW OFFICE OF NG&WASSERMAN PLLC
27 East Broadway, 2nd Floor
New York, NY 10002
Telephone: (212) 925-5616
jedwasserman@ngwasserman.com

EXHIBIT A

Official Website of the Department of Homeland Security

U.S. Immigration and Customs Enforcement

Report Crimes: Email or Call 1-866-DHS-2-ICE

Home | Who We Are | What We Do | Newsroom | Information Library | Contact ICE

< BACK TO RESULTS

Facility Page

Detention Information For:

CHEN FEI PAN
Country of Birth: China, Peoples Republic of
A-Number: 077283006

Current Detention Facility:

BROOKLYN MDC
80 29th Street
Brooklyn, NY 11232
Visitor Information: (718) 840-4200

ERO Office Information

Family members and legal representatives may be able to obtain additional information about this individual's case by contacting this ERO office:

VARRICK, NY, SERVICE PROCESSING CENTER
(DOCKET CONTROL OFFICE)
Phone Number: (212) 863-3401

BACK TO SEARCH >

Related Information

Helpful Info

Status of a Case
About the Detainee Locator
Brochure
ICE ERO Field Offices
ICE Detention Facilities
Privacy Notice

External Links

Bureau of Prisons Inmate Locator

EXHIBIT B

U. S. Department of Justice
Immigration and Naturalization Service

Notice to Appear

In removal proceedings under section 240 of the Immigration and Nationality Act:

File No: A77283 006

In the Matter of:

Respondent: PAN, Chen-Fei, AKA: WANG, Steven currently residing at:

C/O Mr.Hiram Kwan, Esq., 808 N. Spring St., Ste #601, Los Angeles, CA 90012 (213) 680-0122
(Number, street, city, state and ZIP code) (Area code and phone number)

☑ 1. You are an arriving alien.

☐ 2. You are an alien present in the United States who has not been admitted or paroled.

☐ 3. You have been admitted to the United States, but are deportable for the reasons stated below.

The Service alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of the People's Republic of China and a citizen of the People's Republic of China;
3. You arrived at Los Angeles International Airport on July 16, 1999, and applied for admission into the United States;
4. You presented a United States passport in the name of another person, to wit: Wang, Steven, in an attempt to assume the persons identity in order to be admitted into the United States;
5. You did not then possess or present a valid immigrant visa, reentry permit, border crossing identification card, or other valid entry document.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 212 (a)(6)(C)(i) of the Immigration and Nationality Act (Act), as amended, any alien who, by fraud or willfully misrepresenting a material fact, seeks to procure (or has sought to procure or has procured) a visa, other documentation, or entry into the United States or other benefit provided under the Act is inadmissible.

Section 212(a)(7)(A)(i)(I) of the Immigration and Nationality Act (Act), as amended, as an immigrant who, at time of application for admission, is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act.

☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture

Section 235(b)(1) order was vacated pursuant to: ☐ 8 CFR 208.30(f)(2) ☐ 8 CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

EOIR, 606 S. Olive St., 15th Floor, Los Angeles, CA 90014
(Complete Address of Immigration Court, including Room Number, if any)

on to be set (Date) **at** to be set (Time) **to show why you should not be removed from the United States based on the charge(s) set forth above.**

(Signature and Title of Issuing Officer)

Date: 8-1-99

Los Angeles, CA
(City and State)

RECEIVED
DEPARTMENT OF JUSTICE
JUN 29 2001
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
LOS ANGELES, CALIFORNIA

Ex 1
8/15/01

See reverse for important information

Form I-862(Rev. 3-22-99)

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 3.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will provided with this Notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents which you desire to have considered in connection with your case. If any document is in a foreign language, you must bring the original and a certified English translation of the document. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.

At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear and that you are inadmissible or deportable on the charges contained in the Notice to Appear. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge.

You will be advised by the immigration judge before whom you appear, of any relief from removal for which you may appear eligible including the privilege of departing voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

Failure to appear: You are required to provide the INS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the INS.

Request for Prompt Hearing

To expedite a determination in my case, I request an immediate hearing. I waive my right to have a 10-day period prior to appearing before an immigration judge.

_____
(Signature of Respondent)

Before:

_____
(Signature and Title of INS Officer)

Date: _____

Certificate of Service

This Notice To Appear was served on the respondent by me on 08-11-99 (Date), in the following manner and in compliance with section 239(a)(1)(F) of the Act: Interpreter LSA # A2383

☒ in person ☐ by certified mail, return receipt requested ☐ by regular mail

☐ Attached is a credible fear worksheet.
☐ Attached is a list of organizations and attorneys which provide free legal services.

☐ The alien was provided oral notice in the Mandarin language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

滿晨飞
(Signature of Respondent if Personally Served)

Asylum Officer
(Signature and Title of Officer)

Form I-862 (Rev. 3-22-99)

EXHIBIT C

Application for Asylum and for Withholding of Removal

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-589
OMB No. 1615-0067
Expires 09/30/2027

START HERE - Type or print in black ink. See the instructions for information about eligibility and how to complete and file this application. There is no filing fee for this application.

NOTE: [X] Check this box if you also want to apply for withholding of removal under the Convention Against Torture.

Part A.I. Information About You

1. Alien Registration Number(s) (A-Number) *(if any)*	2. U.S. Social Security Number *(if any)*	3. USCIS Online Account Number *(if any)*
A077-283-006	691-194-7069	None

4. Complete Last Name	5. First Name	6. Middle Name
PAN	Chen	Fei

7. What other names have you used *(include maiden name and aliases)?*
WANG Steven

8. Residence in the U.S. *(where you physically reside)*

Street Number and Name	Apt. Number
80 29th St.	N/A

City	State	Zip Code	Telephone Number
Brooklyn	NY	11232	(718)-249-5687

(NOTE: *You must be residing in the United States to submit this form.*)

9. Mailing Address in the U.S. *(if different than the address in Item Number 8)*

In Care Of *(if applicable)*:	Telephone Number
Chen Fei PAN	(718)249-5687
Street Number and Name	Apt. Number
725-48	1A

City	State	Zip Code
Brooklyn	NY	11220

10. Sex [X] Male [ ] Female

11. Marital Status: [X] Single [ ] Married [ ] Divorced [ ] Widowed

12. Date of Birth *(mm/dd/yyyy)*	13. City and Country of Birth
05/05/1980	Changle, Fujian, China

14. Present Nationality *(Citizenship)*	15. Nationality at Birth	16. Race, Ethnic, or Tribal Group	17. Religion
Chinese	Chinese	Asian	Christian

18. *Check the box, a through c, that applies:* a. [ ] I have never been in Immigration Court proceedings.
b. [X] I am now in Immigration Court proceedings. c. [ ] I am **not** now in Immigration Court proceedings, but I have been in the past.

19. *Complete 19 a through c.*
a. When did you last leave your country? *(mm/dd/yyyy)* 1999 b. What is your current I-94 Number, if any? N/A

c. List each entry into the U.S. beginning with your most recent entry. *List date (mm/dd/yyyy), place, and your status for each entry. (Attach additional sheets as needed.)*

Date	Place	Status	Date Status Expires
07/16/1999	LA, California	Inspected/Applied for Admission	N/A
N/A	N/A	N/A	
N/A	N/A	N/A	

20. What country issued your last passport or travel document?	21. Passport Number / Travel Document Number	22. Expiration Date *(mm/dd/yyyy)*
N/A	N/A / N/A	N/A

23. What is your native language *(include dialect, if applicable)?*	24. Are you fluent in English?	25. What other languages do you speak fluently?
Fuzhou	[ ] Yes [X] No	Mandarin

2

Part A.II. Information About Your Spouse and Children

For EOIR use only.	For USCIS use only.	Action: Interview Date: _____ Asylum Officer ID No.: _____	Decision: Approval Date: _____ Denial Date: _____ Referral Date: _____

Your spouse ☒ I am not married. (Skip to **Your Children** below.)

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Date of Birth *(mm/dd/yyyy)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	N/A	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Other names used *(include maiden name and aliases)*
N/A	N/A	N/A	N/A
9. Date of Marriage *(mm/dd/yyyy)*	**10.** Place of Marriage	**11.** City and Country of Birth	
N/A	N/A	N/A	
12. Nationality *(Citizenship)*	**13.** Race, Ethnic, or Tribal Group	**14.** Gender ☐ Male ☐ Female	
N/A	N/A		

15. Is this person in the U.S.?
☐ Yes *(Complete Blocks 16 to 24.)* ☒ No *(Specify location):* N/A

16. Place of last entry into the U.S.	17. Date of last entry into the U.S. *(mm/dd/yyyy)*	18. I-94 Number *(if any)*	19. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A
20. What is your spouse's current status?	**21.** What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	**22.** Is your spouse in Immigration Court proceedings? ☐ Yes ☒ No	**23.** If previously in the U.S., date of previous arrival *(mm/dd/yyyy)*
N/A	N/A		N/A

24. If in the U.S., is your spouse to be included in this application? *(Check the appropriate box.)*
☐ Yes
☒ No

Your Children. List **all** of your children, regardless of age, location, or marital status.

☒ I do not have any children. *(Skip to Part A.III., Information about your background.)*

☐ I have children. Total number of children: 0

(**NOTE:** *Use Form I-589 Supplement A or attach additional sheets of paper and documentation if you have more than four children.)*

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	N/A	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
N/A	N/A	N/A	N/A
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Gender ☐ Male ☐ Female
N/A	N/A	N/A	

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☒ No *(Specify location):* N/A

14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A
18. What is your child's current status?	**19.** What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	**20.** Is your child in Immigration Court proceedings? ☐ Yes ☒ No	
N/A	N/A		

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*
☐ Yes
☒ No

3

Part A.II. Information About Your Spouse and Children (continued)

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	N/A	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
N/A	N/A	N/A	N/A
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
N/A	N/A	N/A	☐ Male ☐ Female

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☒ No *(Specify location):* N/A

14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A

18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings?
N/A	N/A	☐ Yes ☒ No

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*

☐ Yes

☒ No

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	N/A	N/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
N/A	N/A	N/A	N/A
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
N/A	N/A	N/A	☐ Male ☐ Female

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☒ No *(Specify location):* N/A

14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A

18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings?
N/A	N/A	☐ Yes ☒ No

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*

☐ Yes

☒ No

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
N/A	N/A	N/A	N/AN/A
5. Complete Last Name	**6.** First Name	**7.** Middle Name	**8.** Date of Birth *(mm/dd/yyyy)*
N/A	N/A	N/A	N/A
9. City and Country of Birth	**10.** Nationality *(Citizenship)*	**11.** Race, Ethnic, or Tribal Group	**12.** Sex
N/A	N/A	N/A	☐ Male ☐ Female

13. Is this child in the U.S. ? ☐ Yes *(Complete Blocks 14 to 21.)* ☒ No *(Specify location):* N/A

14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
N/A	N/A	N/A	N/A

18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings?
N/A	N/A	☐ Yes ☒ No

21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)*

☐ Yes

☒ No

4

Part A.III. Information About Your Background

1. List your last address where you lived before coming to the United States. If this is not the country where you fear persecution, also list the last address in the country where you fear persecution. *(List Address, City/Town, Department, Province, or State and Country.)*
(NOTE: *Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)*

Number and Street *(Provide if available)*	City/Town	Department, Province, or State	Country	Dates From *(Mo/Yr)*	To *(Mo/Yr)*
Mawei district, vil:50 Hushan, Tingjiang	Fouzhou	Fujian	China	1980	1999
N/A	N/A	N/A	N/A	N/A	N/A

2. Provide the following information about your residences during the past 5 years. List your present address first.
(NOTE: *Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)*

Number and Street	City/Town	Department, Province, or State	Country	Dates From *(Mo/Yr)*	To *(Mo/Yr)*
725-4857	Brooklyn	New York, 11220	United States	2013	Present
Mawei District vil:50 Hushan, Tingjiang	Fuzhou	Fujian	China	1980	1999
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A

3. Provide the following information about your education, beginning with the most recent school that you attended.
(NOTE: *Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)*

Name of School	Type of School	Location *(Address)*	Attended From *(Mo/Yr)*	To *(Mo/Yr)*
Xiang Aiyang Primary School	Middle School	Fuzhou	1985	1993
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A

4. Provide the following information about your employment during the past 5 years. List your present employment first.
(NOTE: *Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)*

Name and Address of Employer	Your Occupation	Dates From *(Mo/Yr)*	To *(Mo/Yr)*
Odd Jobs	Cook	1999	PRESENT
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

5. Provide the following information about your parents and siblings (brothers and sisters). Check the box if the person is deceased.
(NOTE: *Use Form I-589 Supplement B, or additional sheets of paper, if necessary.)*

Full Name	City/Town and Country of Birth	Current Location
Mother ZHAO, Ying Ying	Fuzhou, China	☐ Deceased New York, USA
Father PAN, Zilan	Fuzhou, China	☐ Deceased New York, USA
Sibling PAN, Fa Chen	Fuzhou, China	☐ Deceased Chicago, USA
Sibling		☐ Deceased
Sibling		☐ Deceased
Sibling		☐ Deceased

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Part B. Information About Your Application

(NOTE: Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part B.)

When answering the following questions about your asylum or other protection claim (withholding of removal under 241(b)(3) of the INA or withholding of removal under the Convention Against Torture), you must provide a detailed and specific account of the basis of your claim to asylum or other protection. To the best of your ability, provide specific dates, places, and descriptions about each event or action described. You must attach documents evidencing the general conditions in the country from which you are seeking asylum or other protection and the specific facts on which you are relying to support your claim. If this documentation is unavailable or you are not providing this documentation with your application, explain why in your responses to the following questions.

Refer to Instructions, Part 1: Filing Instructions, Section II, "Basis of Eligibility," Parts A - D, Section V, Completing the Form," Part B, and Section VII, "Additional Evidence That You Should Submit," for more information on completing this section of the form.

1. Why are you applying for asylum or withholding of removal under section 241(b)(3) of the INA, or for withholding of removal under the Convention Against Torture? Check the appropriate box(es) below and then provide detailed answers to questions A and B below:

I am seeking asylum or withholding of removal based on:

- ☐ Race
- ☒ Political opinion
- ☒ Religion
- ☒ Membership in a particular social group
- ☐ Nationality
- ☒ Torture Convention

A. Have you, your family, or close friends or colleagues ever experienced harm or mistreatment or threats in the past by anyone?

☐ No ☒ Yes

If "Yes," explain in detail:
1. What happened;
2. When the harm or mistreatment or threats occurred;
3. Who caused the harm or mistreatment or threats; and
4. Why you believe the harm or mistreatment or threats occurred.

My name is Chenfei Pan. I was born in Fuzhou City, Fujian Province, China on May 5, 1980. In China my girlfriend got pregnant, and violated family planning policy. The local government officials required her to have an abortion. I did not agree and the government officials and I fought each other. For this reason, the Chinese government wanted to capture me. I managed to flee China on July 15, 1999 after hiding myself for two months. When I arrived in America I was stopped and detained at American customs. Having much pressure, after I was released, something was wrong with my brain. I had a mental problem. Influenced by my brother, I started to believe in Christianity. I like how I feel at church.

Please see continuation of statement at the end of the application.

B. Do you fear harm or mistreatment if you return to your home country?

☐ No ☒ Yes

If "Yes," explain in detail:
1. What harm or mistreatment you fear;
2. Who you believe would harm or mistreat you; and
3. Why you believe you would or could be harmed or mistreated.

My name is Chenfei Pan. I was born in Fuzhou City, Fujian Province, China on May 5, 1980. In China my girlfriend got pregnant, and violated family planning policy. The local government officials required her to have an abortion. I did not agree and the government officials and I fought each other. For this reason, the Chinese government wanted to capture me. I managed to flee China on July 15, 1999 after hiding myself for two months. When I arrived in America I was stopped and detained at American customs. Having much pressure, after I was released, something was wrong with my brain. I had a mental problem. Influenced by my brother, I started to believe in Christianity. I like how I feel at church.

Please see continuation of statement at the end of the application. 6

Part B. Information About Your Application (continued)

2. Have you or your family members ever been accused, charged, arrested, detained, interrogated, convicted and sentenced, or imprisoned in any country other than the United States (including for an immigration law violation)?

☒ No ☐ Yes

If "Yes," explain the circumstances and reasons for the action.

3.A. Have you or your family members ever belonged to or been associated with any organizations or groups in your home country, such as, but not limited to, a political party, student group, labor union, religious organization, military or paramilitary group, civil patrol, guerrilla organization, ethnic group, human rights group, or the press or media?

☐ No ☒ Yes

If "Yes," describe for each person the level of participation, any leadership or other positions held, and the length of time you or your family members were involved in each organization or activity.

My name is Chenfei Pan. I was born in Fuzhou City, Fujian Province, China on May 5, 1980. In China my girlfriend got pregnant, and violated family planning policy. The local government officials required her to have an abortion. I did not agree and the government officials and I fought each other. For this reason, the Chinese government wanted to capture me. I managed to flee China on July 15, 1999 after hiding myself for two months. When I arrived in America I was stopped and detained at American customs. Having much pressure, after I was released, something was wrong with my brain. I had a mental problem. Influenced by my brother, I started to believe in Christianity. I like how I feel at church.

Please see continuation of statement at the end of the application.

3.B. Do you or your family members continue to participate in any way in these organizations or groups?

☐ No ☒ Yes

If "Yes," describe for each person your or your family members' current level of participation, any leadership or other positions currently held, and the length of time you or your family members have been involved in each organization or group.

My name is Chenfei Pan. I was born in Fuzhou City, Fujian Province, China on May 5, 1980. In China my girlfriend got pregnant, and violated family planning policy. The local government officials required her to have an abortion. I did not agree and the government officials and I fought each other. For this reason, the Chinese government wanted to capture me. I managed to flee China on July 15, 1999 after hiding myself for two months. When I arrived in America I was stopped and detained at American customs. Having much pressure, after I was released, something was wrong with my brain. I had a mental problem. Influenced by my brother, I started to believe in Christianity. I like how I feel at church.

Please see continuation of statement at the end of the application.

4. Are you afraid of being subjected to torture in your home country or any other country to which you may be returned?

☐ No ☒ Yes

If "Yes," explain why you are afraid and describe the nature of torture you fear, by whom, and why it would be inflicted.

My name is Chenfei Pan. I was born in Fuzhou City, Fujian Province, China on May 5, 1980. In China my girlfriend got pregnant, and violated family planning policy. The local government officials required her to have an abortion. I did not agree and the government officials and I fought each other. For this reason, the Chinese government wanted to capture me. I managed to flee China on July 15, 1999 after hiding myself for two months. When I arrived in America I was stopped and detained at American customs. Having much pressure, after I was released, something was wrong with my brain. I had a mental problem. Influenced by my brother, I started to believe in Christianity. I like how I feel at church.

Please see continuation of statement at the end of the application.

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Part C. Additional Information About Your Application

(**NOTE:** *Use Form I-589 Supplement B, or attach additional sheets of paper as needed to complete your responses to the questions contained in Part C.*)

1. Have you, your spouse, your child(ren), your parents or your siblings ever applied to the U.S. Government for refugee status, asylum, or withholding of removal?

☐ No ☒ Yes

If "Yes," explain the decision and what happened to any status you, your spouse, your child(ren), your parents, or your siblings received as a result of that decision. Indicate whether or not you were included in a parent or spouse's application. If so, include your parent or spouse's A-number in your response. If you have been denied asylum by an immigration judge or the Board of Immigration Appeals, describe any change(s) in conditions in your country or your own personal circumstances since the date of the denial that may affect your eligibility for asylum.

~Brother: PAN, Fa Chen ~Asylum Granted.

2.A. After leaving the country from which you are claiming asylum, did you or your spouse or child(ren) who are now in the United States travel through or reside in any other country before entering the United States?

☒ No ☐ Yes

2.B. Have you, your spouse, your child(ren), or other family members, such as your parents or siblings, ever applied for or received any lawful status in any country other than the one from which you are now claiming asylum?

☒ No ☐ Yes

If "Yes" to either or both questions (2A and/or 2B), provide for each person the following: the name of each country and the length of stay, the person's status while there, the reasons for leaving, whether or not the person is entitled to return for lawful residence purposes, and whether the person applied for refugee status or for asylum while there, and if not, why he or she did not do so.

3. Have you, your spouse or your child(ren) ever ordered, incited, assisted or otherwise participated in causing harm or suffering to any person because of his or her race, religion, nationality, membership in a particular social group or belief in a particular political opinion?

☒ No ☐ Yes

If "Yes," describe in detail each such incident and your own, your spouse's, or your child(ren)'s involvement.

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Part C. Additional Information About Your Application (continued)

4. After you left the country where you were harmed or fear harm, did you return to that country?

☒ No ☐ Yes

If "Yes," describe in detail the circumstances of your visit(s) (for example, the date(s) of the trip(s), the purpose(s) of the trip(s), and the length of time you remained in that country for the visit(s).)

5. Are you filing this application more than 1 year after your last arrival in the United States?

☐ No ☒ Yes

If "Yes," explain why you did not file within the first year after you arrived. You must be prepared to explain at your interview or hearing why you did not file your asylum application within the first year after you arrived. For guidance in answering this question, see Instructions, Part 1: Filing Instructions, Section V. "Completing the Form," Part C.

Due to my medical condition (Depression/Bipolar), I was not aware of the one (1) year deadline. Previously, I was supposed to be in court but never received a notice of the scheduled hearing.

6. Have you or any member of your family included in the application ever committed any crime and/or been arrested, charged, convicted, or sentenced for any crimes in the United States (including for an immigration law violation)?

☐ No ☒ Yes

If "Yes," for each instance, specify in your response: what occurred and the circumstances, dates, length of sentence received, location, the duration of the detention or imprisonment, reason(s) for the detention or conviction, any formal charges that were lodged against you or your relatives included in your application, and the reason(s) for release. Attach documents referring to these incidents, if they are available, or an explanation of why documents are not available.

Arrested on April 29, 2011, in New York, USA. Convicted on May 06, 2011, sent to 11 months Probation, Fines Susp, Pay Costs Restit. of $71.31 to Weiss Mkts ended April 06, 2012.

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Part D. Your Signature

I certify, under penalty of perjury under the laws of the United States of America, that this application and the evidence submitted with it are all true and correct. Title 18, United States Code, Section 1546(a), provides in part: Whoever knowingly makes under oath, or as permitted under penalty of perjury under Section 1746 of Title 28, United States Code, knowingly subscribes as true, any false statement with respect to a material fact in any application, affidavit, or other document required by the immigration laws or regulations prescribed thereunder, or knowingly presents any such application, affidavit, or other document containing any such false statement or which fails to contain any reasonable basis in law or fact - shall be fined in accordance with this title or imprisoned for up to 25 years. I certify that I am physically present in the United States or seeking admission at a Port of Entry when I execute this application. I authorize the release of any information from my immigration record that U.S. Citizenship and Immigration Services (USCIS) needs to determine eligibility for the benefit I am seeking.

WARNING: **Applicants who are in the United States unlawfully are subject to removal if their asylum or withholding claims are not granted by an asylum officer or an immigration judge. Any information provided in completing this application may be used as a basis for the institution of, or as evidence in, removal proceedings even if the application is later withdrawn. Applicants determined to have knowingly made a frivolous application for asylum will be permanently ineligible for any benefits under the Immigration and Nationality Act. You may not avoid a frivolous finding simply because someone advised you to provide false information in your asylum application. If filing with USCIS, unexcused failure to appear for an appointment to provide biometrics (such as fingerprints) and your biographical information within the time allowed may result in an asylum officer dismissing your asylum application or referring it to an immigration judge. Failure without good cause to provide DHS with biometrics or other biographical information while in removal proceedings may result in your application being found abandoned by the immigration judge. See sections 208(d)(5)(A) and 208(d)(6) of the INA and 8 CFR sections 208.10, 1208.10, 208.20, 1003.47(d) and 1208.20.**

Print your complete name.	Write your name in your native alphabet.
Chen Fei Pan	

Did your spouse, parent, or child(ren) assist you in completing this application? ☒ No ☐ Yes *(If "Yes," list the name and relationship.)*

(Name)	*(Relationship)*	*(Name)*	*(Relationship)*

Did someone other than your spouse, parent, or child(ren) prepare this application? ☐ No ☒ Yes *(If "Yes," complete Part E.)*

Asylum applicants may be represented by counsel. Have you been provided with a list of persons who may be available to assist you, at little or no cost, with your asylum claim? ☐ No ☒ Yes

Signature of Applicant *(The person in Part. A.I.)*

➡ [Chen Fei Pan] 8/16/2025

Sign your name so it all appears within the brackets — Date (mm/dd/yyyy)

Part E. Declaration of Person Preparing Form, if Other Than Applicant, Spouse, Parent, or Child

I declare that I have prepared this application at the request of the person named in Part D, that the responses provided are based on all information of which I have knowledge, or which was provided to me by the applicant, and that the completed application was read to the applicant in his or her native language or a language he or she understands for verification before he or she signed the application in my presence. I am aware that the knowing placement of false information on the Form I-589 may also subject me to civil penalties under 8 U.S.C. 1324c and/or criminal penalties under 18 U.S.C. 1546(a).

Signature of Preparer	Print Complete Name of Preparer
	Clavence M Trocio

Daytime Telephone Number	Address of Preparer: Street Number and Name		
(212) 374-9020	111 John Street		
Apt. Number	**City**	**State**	**Zip Code**
1200	New York	New York	10038

To be completed by an attorney or accredited representative (if any).	☐ Select this box if Form G-28 is attached.	Attorney State Bar Number (if applicable)	Attorney or Accredited Representative USCIS Online Account Number (if any)
		2995744	0 3 3 0 9 4 8 1 2 4 8 3

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Part F. To Be Completed at Asylum Interview, if Applicable

NOTE: *You will be asked to complete this part when you appear for examination before an asylum officer of the Department of Homeland Security, U.S. Citizenship and Immigration Services (USCIS).*

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered to were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant

Date *(mm/dd/yyyy)*

Write Your Name in Your Native Alphabet

Signature of Asylum Officer

Part G. To Be Completed at Removal Hearing, if Applicable

NOTE: *You will be asked to complete this Part when you appear before an immigration judge of the U.S. Department of Justice, Executive Office for Immigration Review (EOIR), for a hearing.*

I swear (affirm) that I know the contents of this application that I am signing, including the attached documents and supplements, that they are ☐ all true or ☐ not all true to the best of my knowledge and that correction(s) numbered to were made by me or at my request. Furthermore, I am aware that if I am determined to have knowingly made a frivolous application for asylum I will be permanently ineligible for any benefits under the Immigration and Nationality Act, and that I may not avoid a frivolous finding simply because someone advised me to provide false information in my asylum application.

Signed and sworn to before me by the above named applicant on:

Signature of Applicant

Date *(mm/dd/yyyy)*

Write Your Name in Your Native Alphabet

Signature of Immigration Judge

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Application for Asylum and for Withholding of Removal Supplement A

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-589
OMB No. 1615-0069
Expires 09/30/2027

A-Number *(If available)*	Date
A077-283-006	
Applicant's Name	**Applicant's Signature**
PAN Chen Fei	

List All of Your Children, Regardless of Age or Marital Status

(NOTE: Use this form and attach additional pages and documentation as needed, if you have more than four children)

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth *(mm/dd/yyyy)*
9. City and Country of Birth	10. Nationality *(Citizenship)*	11. Race, Ethnic, or Tribal Group	12. Sex ☐ Male ☐ Female
13. Is this child in the U.S.? ☐ Yes *(Complete Blocks 14 to 21.)* ☐ No *(Specify location):*			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)* ☐ Yes ☐ No			

1. Alien Registration Number (A-Number) *(if any)*	2. Passport/ID Card Number *(if any)*	3. Marital Status *(Married, Single, Divorced, Widowed)*	4. U.S. Social Security Number *(if any)*
5. Complete Last Name	6. First Name	7. Middle Name	8. Date of Birth *(mm/dd/yyyy)*
9. City and Country of Birth	10. Nationality *(Citizenship)*	11. Race, Ethnic, or Tribal Group	12. Sex ☐ Male ☐ Female
13. Is this child in the U.S.? ☐ Yes *(Complete Blocks 14 to 21.)* ☐ No *(Specify location):*			
14. Place of last entry into the U.S.	15. Date of last entry into the U.S. *(mm/dd/yyyy)*	16. I-94 Number *(If any)*	17. Status when last admitted *(Visa type, if any)*
18. What is your child's current status?	19. What is the expiration date of his/her authorized stay, if any? *(mm/dd/yyyy)*	20. Is your child in Immigration Court proceedings? ☐ Yes ☐ No	
21. If in the U.S., is this child to be included in this application? *(Check the appropriate box.)* ☐ Yes ☐ No			

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Application for Asylum and for Withholding of Removal Supplement B

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-589
OMB No. 1615-0069
Expires 09/30/2027

Additional Information About Your Claim to Asylum

A-Number *(if available)*	Date
A077-283-006	
Applicant's Name	Applicant's Signature
PAN, Chen Fei	

NOTE: *Use this as a continuation page for any additional information requested. Copy and complete as needed.*

Part _____

Question _____

I like listening to church fellows sing hymns. I can feel peace in my inner heart. I am afraid to go back to China. I am afraid to be captured and put in jail by the Chinese government if I go back. I am also afraid not to be allowed to freely believe in Christianity to worship the Lord Jesus Christ. I do not know what to do. I have no choice but to apply to American government for political asylum. I sincerely ask American government to protect me and God bless me.

My hometown is in Fujian, China. My girlfriend and I loved each other. Two years after we got to know each other, we lived together. We wanted very much to be with each other all our lives. I hoped I could give her a good life. Before I finished high school, I started to work to make money, to support our family and to be able to live a good life. In February 1999 my girlfriend got pregnant. We were happy. We began to dream of our future life. However, when the family planning committee learned that my girlfriend got pregnant, they came to harass us. They said we did not register, did not have birth permit and were still young. They required my girlfriend to have an abortion. I strongly disagreed. On the morning of May 12, 1999, three officials with the family planning committee came to my home. Without any explanation they forcibly took my girlfriend away. I begged them not to do so, but they did not listen; instead, they pushed me hard. My girlfriend cried for my help. I rushed to the officials who were pulling my girlfriend and fought them. Together, they beat me. I was beaten unconscious. When I came to, my girlfriend had been taken away. I felt so grieved. Why did I have no right of having a child? Why could I not live the life I wanted? Later I blamed myself for not being able to protect my girlfriend and child. What could I do? My girlfriend's crying look made me very sad. That night when I was feeling so sad, unable to eat anything, my girlfriend hurried back suddenly. She told me she escaped from a window when they were not watching her. We were afraid that they would come, so after discussion, my girlfriend and I went to my uncle's home to hide. Later, my mother told me it was lucky of us to run away, for early next morning, the officials came for us. They looked so fierce, saying to my mother that I attacked government officials, committed a serious crime; they must capture me; my girlfriend escaped, defied the government and her crime was also serious. They were sure to catch us and they would not forgive us. If they captured us, they would surely give us a severe punishment. Hearing that, we were scared. My girlfriend and my family members persuaded me to flee. Tears in eyes, my girlfriend also let me go. With the help of friends, I fled China to the United States on July 15, 1999.

On July 16, 1999, arranged by a Chinese agency, I used someone's American passport to enter America. I was caught when I went through American customs in Los Angeles. I was detained in Lancaster Detention Center. After I was bailed out, I was told to be appearing at immigration court. Because I did not get the information when I would go to court, I left California for New York. I felt so stressed that I did not know what to do in the future. I became irritable and restless, nervous and could not help talking, and could not control myself. I began to have mental problem. I often felt as if there was no way out both ahead and behind. I fell in despair. On February 6, 2004 due to my mental disorder, my friend called emergency and I was sent to Bellevue Hospital center in New York and I received treatment until March 4, 2004.

In April 4, 2004 I was transferred to Mental Health Center of Doulder County Inc. I was given a treatment till September 8, 2004. In the following years I sometimes did a job, sometimes just took a rest. Sometimes I did not know what to do.

13

Additional Information About Your Claim to Asylum

A-Number *(if available)*	Date
A077-283-006	
Applicant's Name	**Applicant's Signature**
PAN, Chen Fei	

NOTE: *Use this as a continuation page for any additional information requested. Copy and complete as needed.*

Part _____

Question _____

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14

Application for Asylum and for Withholding of Removal Supplement B

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-589
OMB No. 1615-0069
Expires 09/30/2027

Additional Information About Your Claim to Asylum

A-Number *(if available)*	Date
A077-283-006	
Applicant's Name	Applicant's Signature
PAN, Chen Fei	

NOTE: *Use this as a continuation page for any additional information requested. Copy and complete as needed.*

Part _____

Question _____

PARTICULAR SOCIAL GROUP;
People who are persecuted because of their refusal and failure to comply with a oppressive and unreasonable laws and regulations in connection with the family planning policy and control of the government and also people who do not have the freedom to practice their religion free from government control and interference.

14A

EXHIBIT D

Thursday, January 29, 2026 11:30AM EST

Confirmation # DFAS0070580

Please keep this confirmation number for your records.

Selected Location:

BROOKLYN MDC

BROOKLYN, NY 11232

(212) 863-3401

NYCDetaineeInquiry@ice.dhs.gov

Appointment Information:

Estimated Appointment Duration: **30 Minutes**

Appointment Type: **Standard Remote**

Person Visiting Client: **Jaime Shin**

Type of Visit: **Representational**

Number of Visitors at Appointment: **2**

Virtual Meeting Information: **Please call the number 929-299-8964 or 212-925-5616**

Instructions:
Please make sure to include the phone number for your client call.

Facility Information and Procedures: https://www.ice.gov/detain/detention-facilities/mdc-brooklyn

If you need to cancel or reschedule this appointment, you may do so on in ERO eFile. For additional questions or information, please visit the facility website

Print

EXHIBIT E

State of New York)

) ss.:

County of New York)

AFFIDAVIT

I, Pan, Zilan, under the penalty of perjury, depose and state as follows:

1. My name is Pan, Zilan. I was born on July 28, 1954. I arrived in the United States in July 2014 and am currently a lawful permanent resident. I obtained my lawful permanent resident status through a family-based petition filed by my son. I currently reside at 725 48th St., Brooklyn, New York 11220. I submit this affidavit in support of the bond application of my son, Pan. Chenfei.
2. On June 30, 2025, during a routine check-in at 26 Federal Plaza, New York, NY, my son, Pan Chenfei, was arrested by ICE and has remained in detention since that time. My son entered the United States in 1999 and has resided in the United States for approximately twenty-five years. My son suffers from bipolar disorder. Based on what my son has told me, he has been unable to obtain timely and adequate medical care while in detention, which has caused serious harm to his health. My son has now been unlawfully detained for more than six months.
3. If my son, Pan Chenfei, is released, he will return to reside with me at 725 48th St., Brooklyn, New York 11220. Accordingly, he should not be considered a flight risk.
4. Pan Chenfei has applied for asylum. He will not engage in any conduct that could jeopardize the adjudication of his case before the Immigration Court.
5. If Pan Chenfei is released, I am willing to support him and I commit to ensuring that he appears at all scheduled immigration hearings.

6. Based on the foregoing, I respectfully request that Pan Chenfei be granted bond or released under supervision.

7. I make this declaration voluntarily. The foregoing statements are true and correct to the best of my knowledge and belief.

PAN ZI LAN

Pan, Zilan

Sworn to before me this

3 day of February, 2026

JAIME SHIN
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 02SH0041624
Qualified in New York County
Commission Expires Sept. 16, 2029

Jaime Shin

Notary Public

CERTIFICATE OF TRANSLATION

I, **Frank Fu**, certify that I am competent to translate **from Chinese to English**, and **English to Chinese**. I further certify that the translation of **"Petitioner's Father's Affidavit"** is correct, accurate, and complete to the best of my knowledge and ability.

Date: February 3, 2026

Law Office of Ng & Wasserman, PLLC
27 E. Broadway, 2nd Floor
New York, New York 10002
Tel: (212) 925-5616

Frank Fu

证词

我，潘子兰，愿承担伪证之责，郑重宣誓如下：

1. 我叫潘子兰，我出生于 1954 年 7 月 28 日。我在 2014 年 7 月抵达美国，现在是美国绿卡，我是通过我儿子申请父母拿到的绿卡身份。我目前居住在 725 48th st, Brooklyn, New York, 11220。我提交此宣誓书是为了支持我的儿子潘晨飞的保释申请。
2. 我的儿子潘晨飞在 2025 年 6 月 30 日在 26 Federal Plaza, New York, NY 例行报到时候被 ICE 逮捕并关押至今。我的儿子潘晨飞在 1999 年入境美国，在美国居住了 25 年。我的儿子患有双相情感障碍。据我儿子和我说，他被关在监狱里无法及时获得医疗，这严重的损害了我儿子的健康。我儿子已经被非法羁押超过了 6 个月的时间。
3. 如果我的儿子潘晨飞获得释放，他会回到 725 48th st, Brooklyn, New York, 11220 和我一起居住。因此不应被视为有潜逃风险。
4. 潘晨飞已申请庇护。他不会采取任何可能危及其案件在移民法庭审理的行为。
5. 如果潘晨飞获得释放，我愿意支持他，并承诺确保他参加所有移民听证会。
6. 基于以上情况，我请求给予潘晨飞保释或监督释放。
7. 以上陈述是我自愿作出的，据我所知和所信，内容真实、正确。

潘子兰

潘子兰