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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JURABEK MUSINOV,

Petitioner,

v.

RAUL MALDONADO , the warden of Brooklyn Metropolitan Detention Center, WILLIAM JOYCE, the Acting ICE Field Office Director, KRISTI NOEM, the Secretary of the Department of Homeland Security, TODD M. LYONS, the Acting Director of U.S. Immigration and Customs Enforcement (ICE), PAMELA BONDI, the Attorney General of the United States

Defendants

Civil Action No. 1:26-cv-00628

A# A220-356-526

SUPPLEMENTAL BRIEF

I. INTRODUCTION

1. Petitioner Jurabek Musinov ("Petitioner") respectfully submits this supplemental memorandum in response to Respondents' opposition and accompanying exhibits. The Government's own submissions clarify the dispositive issue before this Court: regardless of how Respondents now characterize the statutory basis for detention, Petitioner was arrested and detained pursuant to discretionary authority under 8 U.S.C. § 1226, following a period of lawful

parole and supervised presence in the United States. Having invoked that discretionary detention framework, Respondents cannot deny Petitioner the procedural protections that necessarily attach to it.

2. The record establishes that the Department of Homeland Security previously granted Petitioner parole into the United States and permitted him to reside in the community while pursuing immigration relief. See Respondents' *Exhibit A* (Interim Notice Authorizing Parole). Years later, DHS detained Petitioner using a Form I-200 Warrant for Arrest of Alien and issued a custody determination expressly invoking Section 236 of the Immigration and Nationality Act. See Respondents' *Exhibit A* (Notice of Custody Determination; Warrant for Arrest of Alien). Section 236 governs discretionary detention pending removal proceedings and contemplates individualized custody review before an Immigration Judge. Yet Petitioner has been denied any bond hearing or neutral determination of whether continued detention is justified.

3. This case therefore does not turn on the parties' competing statutory interpretations. As this Court recognized in *Diallo v. Maldonado*, a habeas court need not resolve disputes over whether detention arises under § 1225 or § 1226 where the Government's conduct results in confinement that violates the Fifth Amendment's guarantee of due process.

4. Even assuming Respondents' present litigation position were accepted, the Constitution prohibits detention that eliminates procedural safeguards after the Government has already invoked a discretionary custody regime.

5. Here, DHS made an individualized decision to parole Petitioner, later chose to arrest him under § 1226 authority, and thereby triggered procedural protections designed to prevent arbitrary civil detention. Due process does not permit the Government to rely on discretionary detention authority to take a person into custody while simultaneously denying the individualized review that discretionary detention requires. At minimum, the Fifth Amendment entitles Petitioner to a prompt bond hearing before an Immigration Judge at which the Government bears the burden of demonstrating, by clear and convincing evidence, that continued detention is necessary to prevent flight or danger to the community.

6. Accordingly, and consistent with this Court's reasoning in *Diallo*, Petitioner respectfully requests that the Court grant the writ of habeas corpus and order his immediate release, or, at minimum, direct Respondents to provide a constitutionally adequate bond hearing without further delay.

II. FACTUAL BACKGROUND

7. Petitioner is a citizen of Uzbekistan who arrived in the United States on November 13, 2021, without inspection, to seek asylum.

8. On November 24, 2021, Petitioner was paroled by ICE from its custody under section 212(d)(5)(A) of the Immigration and Nationality Act ("INA"). The parole was valid for one year and terminated at the end of one-year period.

9. On July 28, 2022, Petitioner filed an asylum application with USCIS.

10. On January 16, 2024, Petitioner's asylum application was dismissed by USCIS.

11. On October 31, 2025, Petitioner was arrested by ICE officers at the New York Asylum office at 1065 Stewart Avenue, Bethpage, NY 11714. He was taken into custody without prior notice, without explanation, without bond hearing and without any individualized assessment of risk.

12. The Warrant of Arrest of Alien, which was served on Petitioner after his arrest and transport to the ICE office at 535 Federal Plaza, Central Islip, NY 11722, states that "there is probable cause to believe that [Petitioner] is removable from the United States ... based upon ... that *the subject either lacks immigration status or, notwithstanding such status, is removable under U.S. immigration law."*

13. On November 3, 2025, Petitioner was served with a Notice to Appear ("NTA") charging him as inadmissible under INA § 212(a)(6)(A)(i), alleging that he was present in the United States without having been admitted or paroled, or that he arrived at a time or place other than one designated by the Attorney General. Notably, *Respondents did not designate Petitioner as an "arriving alien" on the NTA.*

14. On December 17, 2025, Petitioner's asylum application was denied by Immigration Judge and he was ordered removed to Uzbekistan. Petitioner timely filed a notice of appeal. A briefing schedule has not yet been set by the BIA. His I-589 application and appeal are currently pending.

III. DISCUSSION

1. The Court Need Not Resolve the Parties' Statutory Dispute Because Petitioner's Continued Detention Violates the Fifth Amendment

15. Respondents' opposition focuses primarily on the statutory characterization of Petitioner's detention, arguing that he is subject to mandatory detention under 8 U.S.C. § 1225 rather than discretionary detention under 8 U.S.C. § 1226. That dispute, however, is not dispositive of the habeas question before this Court. Federal habeas relief is available whenever a noncitizen is held "in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(3); *Wang v. Ashcroft*, 320 F.3d 130, 140 (2d Cir. 2003).

16. This Court recently applied that principle in *Diallo v. Maldonado*, No. 25-cv-5740 (KAM) (JRC), 2025 WL , at * (E.D.N.Y. Nov. 12, 2025)**, concluding that it need not resolve competing statutory interpretations governing immigration detention where the Government's conduct independently violated the Fifth Amendment's Due Process Clause. There, the Court held that even assuming the Government's statutory position were correct, continued detention could not stand where the procedures employed failed to satisfy constitutional due process requirements. *Id.* at *___. The Court therefore granted habeas relief without deciding whether detention arose under § 1225 or § 1226, resolving the case on constitutional grounds instead.

17. The same analytical approach applies here. Regardless of how Respondents now characterize the statutory basis for custody, the undisputed record demonstrates that Petitioner was granted parole into the United States, resided in the community pursuant to that authorization, and was later arrested pursuant to a Form I-200 administrative warrant accompanied by a custody determination expressly invoking Section 236 of the Immigration and Nationality Act. Those actions triggered procedural protections designed to ensure that civil immigration detention remains individualized and non-arbitrary.

18. Accordingly, this Court need not engage in an extended statutory analysis to determine whether Respondents may retroactively characterize Petitioner as subject to mandatory detention. Even accepting Respondents' present litigation position for purposes of argument, continued confinement without an individualized custody determination before a neutral decisionmaker violates the Due Process Clause of the Fifth Amendment. See *Velasco Lopez v. Decker*, 978 F.3d 842, 850–51 (2d Cir. 2020) (recognizing that noncitizens possess a fundamental liberty interest in freedom from civil detention and are entitled to constitutionally adequate procedures).

19. Because habeas jurisdiction turns on the legality of detention—not the correctness of competing statutory labels—the dispositive question is whether the process afforded to Petitioner satisfies constitutional requirements. It does not. As in *Diallo*, this Court may resolve the present petition by applying settled due process principles to the Government's own custody decisions, without deciding the broader statutory dispute advanced by the parties.

2. DHS Detained Petitioner Pursuant to Discretionary Authority under 8 U.S.C. § 1226

20. The undisputed documentary record establishes that Respondents elected to detain Petitioner pursuant to discretionary detention authority under 8 U.S.C. § 1226. That choice is legally significant because detention under § 1226 carries procedural protections—including individualized custody review—that the Government cannot subsequently withhold through post-hoc recharacterization of detention authority.

21. First, Respondents' own exhibits confirm that the Department of Homeland Security previously granted Petitioner parole into the United States pursuant to INA § 212(d)(5). See Respondents' *Ex. A* (Interim Notice Authorizing Parole). Through that discretionary act, DHS authorized Petitioner's release into the community while he pursued immigration relief, thereby recognizing that detention was not necessary at that time to mitigate flight risk or danger to the public. Petitioner thereafter resided openly in the United States and complied with immigration proceedings under Government supervision.

22. Second, when DHS later took Petitioner into custody, it did so through mechanisms associated with discretionary detention under § 1226. Respondents issued a Form I-200, Warrant for Arrest of Alien, directing immigration officers to take Petitioner into custody pending removal proceedings. See Respondents' *Ex. A* (Warrant for Arrest of Alien). Courts have consistently recognized that the Form I-200 is the administrative arrest instrument used to effectuate detention under § 1226(a), not mandatory detention under § 1225. See, e.g., *Velasco Lopez v. Decker*, 978 F.3d 842, 846 (2d Cir. 2020) (describing detention pursuant to § 1226(a) following arrest by administrative warrant).

23. Third, DHS issued a Notice of Custody Determination explicitly stating that Petitioner was being detained "[p]ursuant to section 236 of the Immigration and Nationality Act." Respondents' Ex. A (Notice of Custody Determination). Section 236, codified at 8 U.S.C. § 1226, governs discretionary detention pending removal proceedings and expressly authorizes release on bond or conditional parole. 8 U.S.C. § 1226(a)(2).

24. These documents reflect not merely administrative formality but a substantive legal determination by DHS regarding the nature of Petitioner's custody. By invoking § 1226 authority, Respondents placed Petitioner within a statutory framework that contemplates individualized decision-making and review before an Immigration Judge. See 8 C.F.R. § 236.1(d)(1) (providing for custody redetermination by an Immigration Judge where detention is imposed under § 1226).

25. Respondents now argue that Petitioner's detention should instead be treated as mandatory custody under § 1225. But the Government's litigation position cannot override the legal consequences of the detention authority it actually exercised. Due process requires that the procedural protections associated with a chosen statutory regime be honored once the Government has invoked that regime to deprive an individual of liberty. See *Velasco Lopez*, 978

F.3d at 853 (holding that civil immigration detention must remain tethered to adequate procedural safeguards to satisfy the Fifth Amendment).

26. In short, DHS did not merely detain Petitioner; it detained him under discretionary authority that presupposes individualized custody review. Having elected to proceed under § 1226, Respondents cannot deny Petitioner the procedures inherent in that framework. At minimum, the Constitution requires that Petitioner receive a bond hearing before a neutral adjudicator to determine whether continued detention is justified.

3. Due Process Requires an Individualized Bond Hearing Where Detention Proceeds under 8 U.S.C. § 1226

27. Civil immigration detention, while constitutionally permissible in limited circumstances, must remain accompanied by adequate procedural safeguards to ensure that confinement is not arbitrary. The Fifth Amendment's Due Process Clause applies to all noncitizens physically present in the United States, regardless of immigration status, and protects against unjustified deprivation of liberty. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Velasco Lopez v. Decker*, 978 F.3d 842, 850 (2d Cir. 2020).

28. Where the Government elects to detain an individual pursuant to discretionary authority under 8 U.S.C. § 1226, due process requires an individualized determination of whether continued detention is necessary to serve the Government's legitimate interests in preventing flight or protecting the community. Section 1226 itself reflects Congress's recognition that detention pending removal proceedings is not categorical; rather, the statute expressly authorizes release on bond or conditional parole. 8 U.S.C. § 1226(a)(2). The statutory framework therefore presumes individualized custody assessment.

29. The Second Circuit has made clear that prolonged civil immigration detention without meaningful procedural safeguards violates due process. In *Velasco Lopez*, the court held that detention under § 1226 became constitutionally deficient where the noncitizen was denied a bond hearing at which the Government bore the burden of justifying continued confinement. 978 F.3d at 855. The court emphasized that "[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Due Process Clause protects." *Id.* at 850 (quoting *Zadvydas*, 533 U.S. at 690).

30. Those principles apply with equal force here. Respondents have detained Petitioner pursuant to discretionary authority while denying him any opportunity to obtain review before a neutral decisionmaker. Without a bond hearing, Petitioner's detention rests solely on unilateral executive determination, creating a substantial risk of erroneous deprivation of liberty—the precise concern procedural due process is designed to prevent.

31. The constitutional analysis is guided by the familiar balancing framework articulated in *Mathews v. Eldridge*, 424 U.S. 319 (1976), which courts in this Circuit routinely apply to immigration detention challenges. See *Velasco Lopez*, 978 F.3d at 851.

32. First, Petitioner's private interest is profound. Civil detention implicates "the most significant liberty interest there is—the interest in being free from imprisonment." *Id.* (internal quotation marks omitted). Petitioner had previously lived in the community pursuant to Government authorization and was taken into custody without any individualized judicial determination that detention remained necessary.

33. Second, the risk of erroneous deprivation is substantial absent a bond hearing. Without neutral review, detention depends entirely on executive discretion, with no mechanism to evaluate Petitioner's actual risk of flight or danger to the community. A bond hearing materially reduces that risk by requiring evidence-based findings before continued confinement may persist.

34. Third, the Government's interest does not outweigh the need for procedural safeguards. Providing a bond hearing imposes minimal administrative burden, as Immigration Judges routinely conduct custody redeterminations under § 1226. Indeed, requiring such hearings merely ensures that the Government follows procedures already contemplated by the statutory scheme.

35. Balancing these factors demonstrates that continued detention without individualized review violates procedural due process. As this Court recognized in *Diallo v. Maldonado*, No. 25-cv-5740 (DG), slip op. at 7–10 (E.D.N.Y. Nov. 12, 2025), immigration detention cannot stand where the Government fails to provide constitutionally adequate process, even where statutory detention authority is disputed. The same conclusion follows here: once discretionary detention is imposed, due process requires meaningful custody review.

36. Accordingly, at minimum, the Constitution entitles Petitioner to a prompt bond hearing before an Immigration Judge at which the Government bears the burden of demonstrating, by clear and convincing evidence, that continued detention is necessary to prevent flight or danger to the community.

4. The Government May Not Retroactively Recharacterize Petitioner's Detention to Avoid Constitutional Safeguards

37. Respondents' opposition ultimately rests on the contention that, notwithstanding the custody documents issued at the time of arrest, Petitioner should be treated as subject to mandatory detention under 8 U.S.C. § 1225. That position cannot be reconciled with either the Government's own actions or the requirements of procedural due process. Once the Government

elects to detain an individual pursuant to a particular statutory framework, it may not retroactively recharacterize that detention in order to eliminate the procedural protections that accompany it.

38. The Fifth Amendment requires that deprivations of liberty occur through fair and predictable procedures. See *Landon v. Plasencia*, 459 U.S. 21, 34 (1982) (holding that even in the immigration context, the Government must provide procedures consistent with due process when exercising detention authority). Fundamental fairness is undermined where the Government relies on one legal basis to arrest and detain a person but later invokes a different statutory theory to avoid judicial review of custody.

39. Here, Respondents detained Petitioner using a Form I-200 administrative warrant and issued a custody determination expressly invoking Section 236 of the Immigration and Nationality Act. Those actions placed Petitioner within the discretionary detention regime established by 8 U.S.C. § 1226—a regime that contemplates individualized custody determinations and review before an Immigration Judge. Having exercised that authority, Respondents cannot now deny the procedural consequences that flow from it by asserting, in litigation, that detention should instead be considered mandatory.

40. Courts evaluating immigration detention have repeatedly emphasized that the Government must adhere to the procedural framework governing the authority it invokes. See *Velasco Lopez v. Decker*, 978 F.3d 842, 853–55 (2d Cir. 2020) (holding that due process is violated where detention proceeds without adequate procedural safeguards despite statutory authorization). Likewise, this Court has recognized that immigration detention becomes unconstitutional where the Government fails to follow the processes required by the governing regulatory and statutory scheme. *Diallo v. Maldonado*, No. 25-cv-5740 (DG), slip op. at 9–10 (E.D.N.Y. Nov. 12, 2025).

41. Permitting Respondents to retroactively redefine Petitioner's detention would allow the Executive Branch to evade constitutional safeguards through post-hoc relabeling of custody authority. Such a rule would undermine the notice function of detention decisions, create unpredictable and arbitrary confinement, and deprive individuals of meaningful access to neutral review—all outcomes incompatible with the Due Process Clause.

42. The constitutional defect is not cured by the Government's assertion that a different statutory provision could have supported detention. Due process focuses on the procedures actually afforded, not hypothetical authority that might have been invoked. Once DHS detained Petitioner pursuant to discretionary authority, the Constitution required that detention remain subject to individualized review. Because no such review has occurred, Petitioner's continued confinement violates the Fifth Amendment.

43. At minimum, the appropriate remedy is an order directing Respondents to provide a prompt bond hearing before an Immigration Judge at which the Government bears the burden of proving, by clear and convincing evidence, that continued detention is necessary.

5. Due Process Clause and Termination of Parole

44. The courts both within the Eastern District of New York and outside that District have rejected the arguments advanced by Respondents in their Response in opposition to the Petition, holding that Petitioner does not remain subject to mandatory detention based on the status he initially held upon entry into the United States after he was paroled, released, and has resided in the country for several years. Moreover, the statutory authority on which Respondents rely does not establish the principle they wish to assert for the following reasons.

45. First, as the court explained in *Coalition for Humane Immigrant Rts. v. Noem*, No. 25-cv-872 (D.D.C. Aug. 1, 2025) ("Coalition"), Section 1182(d)(5)(A) does not say that parolees "return, upon the termination or expiration of their parole, to the position of an applicant for admission standing at the threshold of entry." 2025 WL 2192986, at *24. Nor does it say that they are "restored to the status that [they] had at the time of parole." (Resp. at 15.) "Rather, the provision says that two things happen to a noncitizen following expiration of parole: (1) he 'shall forthwith return or be returned to the custody from which he was paroled'; and (2) 'thereafter his case shall *continue to be dealt with* in the same manner as that of any other *applicant for admission* to the United States.'" *Coalition*, 2025 WL 2192986, at *24 (quoting 8 U.S.C. § 1182(d)(5)(A) (emphasis added)). All the term "applicant for admission" requires is presence in the United States without admission. *See Huamani v. Francis*, No. 25-cv-8110, 2025 WL 3079014, at *3 (S.D.N.Y. Nov. 4, 2025).

46. Thus, Section 1182(d)(5)(A) suggests that rather than reverting to any prior status, a noncitizen whose parole has expired is treated like the vast majority of undocumented immigrants currently living in the United States who are not subjected to expedited removal. *See* 8 U.S.C. § 1225(b)(1)(A)(iii)(II) (permitting the Attorney General to designate for expedited removal only those noncitizens who have not been admitted or paroled and have not been "physically present in the United States continuously for the 2-year period immediately prior to the date of the determination of inadmissibility."). *See Rodriguez-Acurio v. Almodovar et al.*, No. 2:25-cv-6065 (Nov. 28, 2025 E.D.N.Y.).

47. Second, the clause in Section 1182(d)(5)(A) directing that parolees "shall forthwith return or be returned to the custody from which [they were] paroled" does not place Petitioner within the Designation Provision either. *See* 8 U.S.C. § 1182(d)(5)(A). The Supreme Court has confirmed that "nothing in this text [of Section 1182(d)(5)(A)] . . . affirmatively authorizes detention," so the statute is not an independent authority to detain parolees following the expiration of parole. *Clark*

v. Martinez, 543 U.S. 371, 385 (2005). To the contrary, the Supreme Court has stressed, "[Section 1182(d)(5)(A)] provides that, when parole is revoked [or expires]" the noncitizen will be returned to the "custody from which he was paroled and thereafter *his case shall continue to be dealt with in the same manner as that of any other applicant for admission.*" Id. (emphasis in original).

48. Here, Section 1182(d)(5)(A) may permit Petitioner to be returned to ICE custody, but his case, which necessarily includes the procedures required before detention, "shall continue to be dealt with in the same manner as that of any other applicant for admission," 8 U.S.C. § 1182(d)(5)(A), and any other applicant for admission residing in the United States for more than three years would be detained under Section 1226, *see, e.g.*, *Huamani v. Francis*, No. 25-cv-8110, 2025 WL 3079014, at *3 (S.D.N.Y. Nov. 4, 2025) (holding that Section 1226 "governs the process of arresting and detaining non-citizens who have already entered the United States pending their removal" (quoting *Jennings*, 583 U.S. at 288)); *Lopez Benitez v. Francis*, No. 25-cv-5937, 2025 WL 2371588, at *3 (S.D.N.Y. Aug. 13, 2025) (holding that "'*once inside* the United States . . . *an alien present in the country* may still be removed' under Section 1226" (quoting *Jennings*, 583 U.S. at 288)).

49. It is well established that habeas review permits the Court to examine the constitutionality of the Petitioner's arrest and detention, consistent with the Due Process Clause, without intruding upon the Executive's authority. "The Court recognizes that the Government may, under some circumstances, terminate parole that has been granted under 8 U.S.C. § 1182(d)(5); however, it must first provide written notice of its determination that the purpose of parole was accomplished, or its determination that "neither humanitarian reasons nor public benefit warrants the continued presence of an alien in the United States." 8 C.F.R. § 212.5(e)(2)(i). In conjunction with written notice, the Government must also provide the alien resident with a meaningful opportunity to respond to its decision to terminate parole." *See Talabadze v. Rose*, No. 26-cv-00360 (E.D. Pa. Jan. 30, 2026), *Sadykov v. Rose*, No. 2:26-cv-00086 (E.D. Pa. Jan. 16, 2026), *Campbell v. Almodovar,* No. 1:25-cv-09509 (S.D.N.Y. Dec. 10, 2025).

50. It is undisputed that Petitioner was arrested and placed in detention without prior notice, without explanation, without bond hearing, and without any individualized assessment of risk. Rather than exercising discretion through any case-specific evaluation or balancing of Petitioner's substantial liberty interests against the government's interests, Respondents subjected Petitioner to a blanket detention policy, in violation of the Due Process Clause. Therefore, the Court should find that Petitioner's detention unconstitutional and grant the petition for writ of habeas corpus.

IV. REQUESTED RELIEF

51. For the reasons set forth above, Petitioner respectfully requests that the Court grant the writ of habeas corpus and order his immediate release from custody. Petitioner's continued

detention pursuant to discretionary authority, without any individualized determination before a neutral adjudicator, violates the Fifth Amendment's guarantee of due process and therefore cannot lawfully continue. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Velasco Lopez v. Decker*, 978 F.3d 842, 855 (2d Cir. 2020).

52. Immediate release is the appropriate remedy where detention proceeds in violation of constitutional safeguards. As this Court recognized in *Diallo v. Maldonado*, No. 25-cv-5740 (DG), slip op. at 10–11 (E.D.N.Y. Nov. 12, 2025), habeas relief is warranted where the Government's custody decisions fail to comport with procedural due process requirements. Because Petitioner has been deprived of liberty without constitutionally adequate process, the writ should issue.

53. At minimum, however, the Court should order Respondents to provide a prompt bond hearing before an Immigration Judge consistent with constitutional requirements. Where civil immigration detention continues under 8 U.S.C. § 1226, due process requires more than a perfunctory custody review; it requires a meaningful adversarial hearing at which continued confinement is justified by evidence rather than presumption. See *Velasco Lopez*, 978 F.3d at 855.

54. Critically, such a hearing must place the burden on the Government—not the detained individual—to justify ongoing detention. Civil immigration confinement is nonpunitive in nature, and "[f]reedom from imprisonment… lies at the heart of the liberty that the Due Process Clause protects." *Id.* at 850 (quoting *Zadvydas*, 533 U.S. at 690). In light of the substantial liberty interest at stake and the risk of erroneous deprivation inherent in prolonged executive detention, due process requires that the Government demonstrate, by **clear and convincing evidence**, that continued detention is necessary because Petitioner poses either a danger to the community or a genuine risk of flight.

55. This allocation of the burden is particularly essential to preserve the neutrality and reliability of custody determinations in the modern immigration detention system, where liberty turns on individualized factual findings rather than categorical assumptions. Requiring the Government to justify detention ensures that civil confinement remains carefully limited to those cases where it is genuinely necessary, rather than functioning as automatic or indefinite detention without meaningful review.

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56. Accordingly, Petitioner respectfully requests that the Court:

a. Grant the petition for a writ of habeas corpus and order Petitioner's immediate release; or, *in the alternative,*

b. Order Respondents to provide, within a fixed and prompt period set by the Court, an individualized bond hearing before an Immigration Judge at which:

- the Government bears the burden of proof;
- the standard of proof is clear and convincing evidence; and
- continued detention is permitted only upon a finding that Petitioner presents a danger to the community or a risk of flight.

Such relief is necessary to ensure that Petitioner's detention complies with the Fifth Amendment and remains consistent with the constitutional limits governing civil immigration confinement.

Respectfully submitted,
Date: February 20, 2026

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