U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

March 16, 2026

Honorable Gary R. Brown
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Juan Jordan Chacon v. Bondi, et al.*, 26-cv-1550 (Brown, J.)

Dear Judge Brown:

This Office represents Respondents in the above captioned habeas petition filed by Petitioner Juan Jordan Chacon ("Petitioner"). Docket Entry ("DE") #1. Petitioner was arrested on March 14, 2026.

This letter is respectfully submitted pursuant to Your Honor's Standing Order dated February 19, 2026. DE 3. Respondents note that Petitioner entered the United States at an unknown time and place and currently does not appear to have any pending applications for relief.

Further, Respondents provide the following information as required by Your Honor's order to provide the Court with information of a "particularized reason to believe that Petitioner presents a danger to the community, a flight risk" or any information that Petitioner should be detained due to his involvement with "illegal narcotics, violence, criminal history, firearms, gang affiliation and the like." *See* DE 3.

Immigration and Customs Enforcement ("ICE") has advised the undersigned that, on March 14, 2026, during Petitioner's arrest, which was carried out by officers wearing highly visible markings that indicated "POLICE", "ERO", and "ICE", Petitioner fled on foot as the officers approached him and identified themselves. Petitioner was detained after he tripped and fell during a brief foot pursuit.

ICE further advises that Petitioner was arrested on July 7, 2024 by the Nassau County Police Department for driving while intoxicated, first offense. On August 25, 2025, Petitioner was convicted of a misdemeanor upon a plea of guilty for driving while intoxicated. Petitioner was released on probation, Supervision Case Number CR-013543-24NA, with a maximum expiration date of February 17, 2029.

Finally, ICE advises that it appears that on at least three occasions Petitioner had been apprehended at the border and voluntarily returned to Mexico. On each of these three occasions, he was returned under a different name: Jose Cristian Flores-Palomeque, voluntarily returned

October 6, 2005; Arturo Sanchez-Hernandez, voluntarily returned October 9, 2005; and Jose Flores-Palomeque, voluntarily returned October 14, 2005.

Based upon Petitioner's attempt to flee while being arrested with respect to his detention here, his criminal history, and his use of multiple aliases in connection with his prior detentions and voluntary returns from the United States, Respondents respectfully submit that Petitioner should not be released on his own recognizance, as provided in the Court's standing order, and that Petitioner should instead remain in detention until the Court rules on the Petition. In the alternative, should the Court decide to release Petitioner from detention, Respondents respectfully submit that the imposition of a bond with a surety is appropriate under these circumstances.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/ *Thomas R. Price*
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