Jadeja-Cimone Law, PC

March 17, 2026

BY ECF
Honorable Judge Gary R. Brown
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Juan Jordan Chacon v. Bondi, et al.*, 2:26-cv-1550 (Brown, J.)

Dear Judge Brown,

Counsel for Petitioner respectfully writes in response to the Court's Order directing Petitioner to advise whether a bail hearing remains necessary in light of the Government's submission at Docket Entry 5.

Petitioner respectfully submits that a bail determination remains appropriate. While Respondents' letter identifies several factors they believe support continued detention, those allegations underscore the need for an individualized determination regarding whether Petitioner may safely be released on appropriate conditions pending resolution of the habeas petition.

For example, the Government references a prior conviction for driving while intoxicated. However, Petitioner recently completed a drug and alcohol counseling program and received a Certificate of Achievement dated February 5, 2026, which is attached hereto as **Exhibit A**. This recent rehabilitation effort directly addresses the Government's concerns and demonstrates that Petitioner has taken meaningful steps to address the underlying issue and remain compliant with the conditions of his probation.

The Government also notes that Petitioner briefly ran when officers approached him. Petitioner respectfully notes that he was confronted unexpectedly by multiple officers while on his

way to work and was understandably startled. The brief incident described by the Government does not meaningfully reflect a likelihood that Petitioner would fail to appear for proceedings, particularly given his longstanding residence and family ties in this District.

Respondents also reference prior voluntary returns at the border under different names more than twenty years ago. Petitioner respectfully submits that these historical events, which occurred long before his many years of residence in the United States, do not meaningfully reflect his present circumstances or his likelihood of appearing for proceedings today.

Petitioner has resided in the United States for many years and lives in Nassau County with his two United States citizen children. Petitioner is prepared to submit additional documentation regarding his family and community ties should the Court find it helpful or should the Court schedule a bail hearing.

Under these circumstances, Petitioner respectfully requests that the Court schedule a bail hearing pursuant to its Standing Order so that the parties may address the relevant factors and the Court may make an individualized determination regarding release. In the alternative, Petitioner respectfully requests that the Court consider release on recognizance subject to the standard conditions set forth in the Court's Standing Order.

Respectfully submitted,

By: */s/ Sarah M. Coniglio, Esq.*

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cc: All Counsel of Record (by ECF)