IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

OROZCO FELIX, *Petitioner*, v. J.L. JAMISON, *et al.*, *Respondents*.	Civil Action No. 26-2491

RESPONDENTS' OPPOSITION TO
PETITION FOR WRIT OF HABEAS CORPUS

I. INTRODUCTION

In light of the facts set out below regarding Petitioner's recent criminal history, even if the Court agrees with Petitioner's statutory interpretation, respondents respectfully request that the Court not order Petitioner to be released but, instead, order a further bond hearing for an immigration judge to evaluate whether he poses a flight risk or danger to the community.

As the Court is undoubtedly aware, immigration detainees in this district have filed hundreds of petitions for writs of habeas corpus challenging the authority of the Secretary of the U.S. Department of Homeland Security ("DHS") to detain them without setting a bond hearing. These cases involve individuals who have been detained pending the completion of their removal proceedings, including consideration of their asylum claims as a defense to removal, and break down into four categories:

- ***Hurtado*[1] cases**: individuals who entered the United States without inspection; after a passage of time, they were encountered by immigration authorities in the interior, placed in standard removal proceedings, and recently were detained under 8 U.S.C. § 1225(b)(2)(A); *see, e.g., Cantu-Cortes v. O'Neill*, No. 25-cv-6338, 2025 WL 3171639, at *1–2 (E.D. Pa. Nov. 13, 2025);
- ***Q. Li*[2] cases**: individuals who entered the United States without inspection, were encountered near the border and detained without a warrant, released into the country, and, after a passage of time, recently detained under 8 U.S.C. § 1225(b)(2)(A); *see, e.g., Cordero v. Rose*, No. 26-cv-534 (E.D. Pa. Jan. 29, 2026);
- **Arriving Alien cases**: individuals who presented at a port of entry without valid entry documents, were paroled into the country under 8 U.S.C. § 1182(d)(5)(A), and, after a passage of time, recently detained under 8 U.S.C. § 1225(b)(2)(A); *see, e.g., Vasquez-Rosario v. Noem*, No. 25-cv-7427, 2026 WL 196505, at *5 (E.D. Pa. Jan. 26, 2026); and,
- **Expedited Removal cases**: individuals who, based on certain conditions related to their time, manner, and place of entry, were placed into expedited removal proceedings, paroled into the country under 8 U.S.C. § 1182(d)(5)(A), and, after a passage of time, recently detained under 8 U.S.C. § 1225(b)(1)(B)(iv); *see, e.g., Seminario Marcos v. Jamison*, No. 26-cv-421 (E.D. Pa. Feb. 6, 2026).

[1] "*Hurtado*" refers to the Board of Immigration Appeals' decision in *Matter of Hurtado*, 29 I & N Dec. 216 (BIA 2025).

[2] "*Q. Li*" refers to the Board of Immigration Appeals' decision in *Matter of Q. Li,* 29 I&N Dec. 66 (BIA 2025).

The first three categories of cases (*Hurtado*, *Q. Li*, and Arriving Alien) all share the same authority for mandatory detention: 8 U.S.C. § 1225(b)(2)(A). While there are certain legal and factual distinctions among these cases, the fundamental point of departure between the government's position and the position advanced by petitioners and adopted in over 250 decisions in this district relates to the correct interpretation of § 1225(b)(2)(A):

> In the cases of an alien who is an **applicant for admission**, if the examining immigration officer determines that an **alien seeking admission** is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained for a proceeding under section 1229a of this title.

8 U.S.C. § 1225(b)(2)(A) (emphasis added).

Although petitioners in these cases are indisputably "applicants for admission," *see* 8 U.S.C. § 1225(a)(1), courts in this district (and many elsewhere) have concluded that § 1225(b)(2)(A) does not apply to applicants for admission who are present in the interior of the country because, these decisions conclude, the petitioners are no longer "seeking admission." Courts have reasoned that "seeking admission" should be given meaning beyond "applicant for admission" to avoid surplusage and have read the term to require active and ongoing efforts to be admitted at or near the border. *See, e.g., Kashranov v. Jamison*, Civ. No. 25-5555, 2025 WL 3188399, *6–7 (E.D. Pa. 2025); *Vasquez-Rosario*, 2026 WL 196505, at *9.

By contrast, the government contends that "applicants for admission" are necessarily "seeking admission" until they have been admitted or until their removal proceedings are complete. And while the government's position has been rejected by the vast majority of district courts to have considered it, two courts of appeals to have squarely considered the argument, the Fifth and Eighth Circuit Courts of Appeals, have agreed with the government. *See Buenrostro-Mendez v. Bondi*, 166 F.4th 494, 502 (5th Cir. 2026) ("The everyday meaning of the statute's terms confirms that being an 'applicant for admission' is not a condition

independent from 'seeking admission.'"); *Avila v. Bondi*, No. 25-3248, 2026 WL 819258, at *3 (8th Cir. Mar. 25, 2026) (concluding that "the structure of § 1225(b)(2)(A) does not indicate that 'seeking admission' is a separate requirement for detention under the statute"); *but see Castañon-Nava v. U.S. Dep't of Homeland Sec.*, 161 F.4th 1048, 1062 (7th Cir. 2025) (concluding upon review of application for stay of a preliminary injunction that the government was not likely to succeed on the merits of its argument for mandatory detention of applicants for admission present in the United States under § 1225(b)(2)(A)).

This is a "*Q. Li*" case where the government has detained Petitioner under 8 U.S.C. § 1225(b)(2)(A). Petitioner, a noncitizen, crossed the border without inspection on or about January 29, 2023. (*See* Ex. A, Form I-213 at p. 3 (immigration history)). Upon entering the United States, Petitioner was arrested by the United States Border Patrol, detained, and placed in removal proceedings. (*Id.*) On March 29, 2023, Petitioner was released on an Order of Recognizance. (*Id.*). Thereafter, on March 3, 2026, Petitioner was arrested by the Pennsylvania State Police in Aston, Pennsylvania and criminally charged with driving under the influence of alcohol, fleeing or attempting to elude officers, and causing an accident involving damage. (Petition at ¶ 6; *see also* Ex. A, at 3 (criminal history); Ex. B, March 3, 2026 Police Report). ICE then immediately lodged a detainer with the George W. Hill Correctional Facility in Delaware County, Pennsylvania, Ex. A, at 3, and also issued an I-200 ICE Warrant of Arrest, to locate and arrest Petitioner. (*Id.*) On approximately April 8, 2026, ICE arrested and detained Petitioner under to 8 U.S.C. § 1225(b)(2)(A). (Petition, at ¶ 7).

Thus, the case turns principally on the threshold question of statutory interpretation discussed above—whether petitioner is an "applicant for admission"

that is "seeking admission" within the meaning of § 1225(b)(2)(A).[3] The government expands on that argument below in the context of Petitioner, who was first encountered near the border after entering without inspection (thereby falling within the scope of the BIA's decision in *Q. Li*), and addresses Petitioner's separate argument alleging a violation of due process.

Even if the Court again agrees with Petitioner's statutory interpretation in this case, however, Respondents respectfully request that the Court order a bond hearing. Doing so would permit an immigration judge to evaluate whether petitioner poses a flight risk or danger to the community in light of the recent criminal history described above.

II. ARGUMENT

The Court should deny the petition because: (1) Petitioner is lawfully detained pursuant to 8 U.S.C. § 1225(b)(2)(a); and (2) Petitioner's detention does not violate constitutional due process.

A. Petitioner is lawfully detained pursuant to 8 U.S.C. § 1225(b)(2).

1. Petitioner is an "applicant for admission" "seeking admission."

An individual who "arrives in the United States," or is "present" in this country but "has not been admitted," is considered an "applicant for admission" under 8 U.S.C. § 1225(a)(1). *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018); *Buenrostro-Mendez*, 166 F.4th at 499. Applicants for admission are covered by either § 1225(b)(1) or § 1225(b)(2). *See Jennings*, 583 U.S. at 287 (section 1225(b)(2) "serves as a catchall provision that applies to *all* applicants for admission not covered by § 1225(b)(1)") (emphasis added).

[3] In many of its prior responses filed in this district, the government has advanced various jurisdictional arguments that it is not advancing here. Of course, the Court may appropriately satisfy itself of its jurisdiction upon consideration of 8 U.S.C. §§ 1225(b)(9), 1252(a)(2)(B)(ii), 1252(g), and the Third Circuit's decision in *Khalil v. President, United States of America*, 164 F.4th 259 (3d Cir. 2026).

An alien remains an applicant for admission, and subject to § 1225(b)(2), so long as he is "not clearly and beyond doubt entitled to be admitted" to the United States. *See* 8 U.S.C. § 1225(b)(2)(A); *see also* 8 U.S.C. § 1225(a) (defining applicant for admission as *either* "[a]n alien present in the United States who has not been admitted *or* who arrives in the United States. . . .") (emphasis added). Congress defined *all* aliens who are present in the United States without being admitted as "applicant[s] for admission," regardless of when they entered. *See* 8 U.S.C. § 1225(a)(1).

When an immigration officer encounters and examines an applicant for admission who seeks to remain in the United States, and that alien (like Petitioner) desires to remain in the United States, the applicant is necessarily "seeking admission" within the meaning of 8 U.S.C. § 1225(b)(2)(A). *See Buenrostro-Mendez*, 166 F.4th at 503 ("[A]n 'applicant for admission' is necessarily someone who is 'seeking admission.'"); *id.* at 502 ("When a person applies for something, they are necessarily seeking it."). Otherwise, the alien must "withdraw the application for admission and depart immediately from the United States." 8 U.S.C. § 1225(a)(4). An alien continues to be "seeking admission" while in immigration removal proceedings to determine whether he can "be admitted to the United States." *See* 8 U.S.C. § 1229a(3).

The government acknowledges that all courts in this district (and many more elsewhere) have reasoned that § 1225(b)(2)(A) requires that an "applicant for admission" be actively "seeking admission" at or near the border to fall within its scope. *See*, *e.g.*, *Kashranov*, 2025 WL 3188399, at *6–7; *Demirel v. Fed. Detention Ctr.*, Civ. No. 25-5488 (E.D. Pa. Nov. 18, 2025).[4] But, as noted, the Fifth Circuit

[4] The government is pursuing appeals in the Third Circuit related to both statutory and constitutional due-process claims. The matters on appeal are *Lopes De Andrade v. Director Philadelphia Field Office Immigration and Customs Enforcement, et al.*, No. 26-1454 (3d Cir.), and *Buele Morocho v. Warden Philadelphia FDC, et al.*, No. (continued)

Court of Appeals has agreed with the government. *See Buenrostro-Mendez*, 166 F.4th at 502 ("The everyday meaning of the statute's terms confirms that being an 'applicant for admission' is not a condition independent from 'seeking admission.'"). The *Buenrostro-Mendez* court concluded, correctly, that an "applicant for admission" is "necessarily someone who is 'seeking admission.'" *Id.* at 503; *but see Castañon-Nava*, 161 F.4th at 1062.

Thus, Petitioner, who is indisputably an "applicant for admission," is also "seeking admission" and covered by § 1225(b)(2)(A).

2. Applicants for admission must be detained under 8 U.S.C. § 1225(b)(2)(A), absent discretionary parole.

Pursuant to 8 U.S.C. § 1225(b)(2)(A), "in the case of an alien who is an applicant for admission, if the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted, the alien **shall be detained** for a proceeding under section 1229a [removal proceedings]." 8 U.S.C. § 1225(b)(2)(A) (emphasis added). The Supreme Court has held that § 1225(b)(2)(A) is a mandatory detention statute and that individuals detained pursuant to that provision are not entitled to bond. *Jennings*, 583 U.S. at 287 ("Both § 1225(b)(1) and § 1255(b)(2) authorize the detention of certain aliens.").

In *Q. Li*, the BIA expanded upon the Supreme Court's holding in *Jennings* and clarified the scope of § 1255(b)(2) for applicants for admission, like Petitioner, who are "arriving" in the United States. 29 I&N Dec. at 68 (citing *Matter of M-D-C-V-*, 28 I&N Dec. 18, 23 (BIA 2020) (defining the term "arriving" to apply to aliens "who [are] apprehended" just inside "the southern border, and not at a point of entry, on the same day [they] crossed into the United States"). For aliens in this category, the BIA affirmed that DHS may either place the alien into expedited

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26-1150 (3d Cir.), which are now consolidated for all purposes. The government's consolidated opening brief was filed on March 20, 2026. The Third Circuit granted the Government's motion to expedite the consolidated appeals and scheduled them for disposition by the Court during the week of May 11, 2026.

removal proceedings under § 1225(b)(1) or full removal proceedings under § 1229a. *Id*. For the latter category—aliens arriving in and seeking admission into the United States who are placed directly into full removal proceedings—the Board held that § 1225(b)(2)(A) mandates detention "until removal proceedings have concluded." *Id*. (citing *Jennings*, 583 U.S. at 299).

Thus, the BIA held that an applicant for admission "who is arrested and detained without a warrant while arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings," is detained under § 1225(b)(2) and is thus ineligible for any subsequent release on bond. *But see Cordero v. Rose*, Civ. No. 26-0534, ECF No. 5 at 5-6 (E.D. Pa. Jan. 29, 2026) (Marston, J.) (disagreeing with the United States' interpretation of *Q. Li* and concluding that the petitioner, who entered the United States more than three years ago, was not an applicant for admission that was actively "seeking admission" within the meaning of § 1225(b)(2)); *Cajas-Duchimaza v. McShane*, Civ. No. 26-0621, ECF No. 6 (E.D. Pa. Feb. 3, 2026) (similar); *Gurievi v. Rose*, Civ. No. 26-0736, ECF No. 6 (E.D. Pa. Feb. 9, 2026).

Petitioner remains an applicant for admission seeking admission, as he has not clearly and beyond doubt established that he is entitled to be admitted to the United States. Consequently, he is subject to mandatory detention under § 1225(b)(2), and ineligible for a bond hearing before an immigration judge.

B. Petitioner's detention does not violate constitutional due process.

Congress broadly crafted "applicants for admission" to include undocumented persons, like Petitioner, who are present within the United States. *See* 8 U.S.C. § 1225(a)(1). In so doing, Congress made a legislative judgment to detain undocumented persons during removal proceedings. 8 U.S.C. § 1225(b)(2)(A); *Jennings*, 583 U.S. at 297 ("Read most naturally, §§ 1225(b)(1) and (b)(2) thus

mandate detention of applicants for admission until certain proceedings have concluded.").

The Supreme Court has repeatedly recognized this profound interest. Petitioner's mandatory detention pursuant to § 1225(b) will only last the duration of his removal proceedings. *Demore v. Kim*, 538 U.S. 510, 512 (2003) ("[B]ecause the statutory provision at issue in this case governs detention of deportable criminal aliens *pending their removal proceedings*, the detention necessarily serves the purpose of preventing the aliens from fleeing prior to or during such proceedings.") (emphasis in original); *see also Jennings*, 583 U.S. at 304. In light of Congress's interest in regulating immigration, including by keeping specified persons in detention pending the removal period, the Supreme Court dispensed of any due process concerns without engaging in the test set forth in *Matthews v. Eldridge*, 424 U.S. 319 (1976). *See generally Demore*, 538 U.S. at 531.

Petitioner's recent detention pending his removal proceedings does not violate the Due Process Clause. *See*, *e.g.*, *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001) (detention less than six months presumed constitutional). Congress made the decision to detain him pending removal, which is a "constitutionally permissible part of that process." *Demore*, 538 U.S. at 531.

The Third Circuit has recognized that there may come a time when mandatory civil detention without a bond hearing becomes unreasonable. *See German Santos v. Warden Pike Cnty. Corr. Facility*, 965 F.3d 203, 211 (3d Cir. 2020) (analyzing detention under § 1226(c)). However, at this time, Petitioner does not challenge the length of his detention under *German Santos*, nor could he, given that he has been detained for approximately one week.

III. CONCLUSION

For the foregoing reasons, Respondents respectfully request that the petition for writ of habeas corpus be denied. In light of the facts set out above regarding

Petitioner's recent criminal history, even if the Court agrees with Petitioner's statutory interpretation, respondents respectfully request that the Court not order Petitioner to be released but, instead, order a further bond hearing for an immigration judge to evaluate whether he poses a flight risk or danger to the community. Respondents request that the Court decide this petition on the papers.

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ Gregory B. David
GREGORY B. DAVID
Assistant United States Attorney
Chief, Civil Division

/s/ Fernando I. Rivera
FERNANDO I. RIVERA
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Philadelphia, PA 19106
fernando.rivera@usdoj.gov

Dated: April 17, 2026

Counsel for Respondents

Exhibit A

U.S. Department of Homeland Security Subject ID : [redacted]

Record of Deportable/Inadmissible Alien

Family Name (CAPS)	First	Middle
OROZCO FELIX, MARIO RAUL		

Sex	Hair	Eyes	Cmplxn
M	BLK	BRO	LGT

Country of Citizenship	Passport Number and Country of Issue	Height	Weight	Occupation
GUATEMALA	[redacted]	65	160	UNR

[redacted]

Scars and Marks:

Date, Place, Time, and Manner of Last Entry	Passenger Boarded at
Unknown Date Unknown Time,	

F.B.I. Number: [redacted]

☒ Single ☐ Divorced ☐ Married ☐ Widower ☐ Separated

Number, Street, City, Province (State) and Country of Permanent Residence:

Method of Location/Apprehension: NCA

Date of Birth	Date of Action	Location Code	At/Near	Date/Hour
[redacted] Age: 20	04/08/2026	PHI/PHI	See I-831	04/08/2026 12:36

City, Province (State) and Country of Birth	AR	Form : (Type and No.) Lifted ☐ Not Lifted ☐	By
GUATEMALA	☒		See Narrative

NIV Issuing Post and NIV Number	Social Security Account Name	Status at Entry	Status When Found

Date Visa Issued	Social Security Number	Length of Time Illegally in U.S.

Immigration Record	Criminal Record
NEGATIVE	See Narrative

Name , Address, and Nationality of Spouse (Maiden Name, if Appropriate)	Number and Nationality of Minor Children
	None

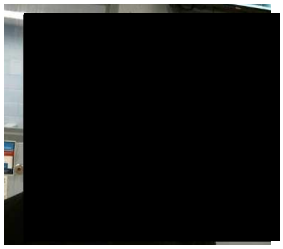
Father's Name, Nationality, and Address, if Known	Mother's Present and Maiden Names, Nationality, and Address, if Known

Monies Due/Property in U.S. Not in Immediate Possession	Fingerprinted? ☐ Yes ☒ No	Systems Checks	Charge Code Words(s)
None Claimed			See Narrative

Name and Address of (Last)(Current) U.S. Employer	Type of Employment	Salary	Employed from/to
	Unemployed or Retired	Hr	

Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)

Left Index fingerprint Right Index fingerprint



FAMILY INFORMATION

Father:Subject has not provided information for Father.
Mother:Subject has not provided information for Mother.
Spouse:Subject is not married.
Child:Subject does not have children or dependents.

SUBJECT HEALTH STATUS

The subject claims good health. ...(CONTINUED ON I-831)

C 05551 HERNANDEZ
Deportation Officer
(Signature and Title of Immigration Officer)

Alien has been advised of communication privileges _____ (Date/Initials)

Distribution:

Received: (Subject and Documents) (Report of Interview)

Officer: C 05551 HERNANDEZ

on: April 8, 2026 (time)

Disposition: Other

Examining Officer: BROWN, D 6876

Alien's Name	File Number	Date
OROZCO FELIX, MARIO RAUL	[redacted] Event No: [redacted]	04/08/2026

CURRENT CRIMINAL CHARGES

04/08/2026 - 8 USC 1182 - ALIEN INADMISSIBILITY UNDER SECTION 212

CURRENT ADMINISTRATIVE CHARGES

04/08/2026 - 212a6Ai - ALIEN PRESENT WITHOUT ADMISSION OR PAROLE - (PWAs)04/08/2026 - 212a7AiI - IMMIGRANT WITHOUT AN IMMIGRANT VISA

ARRESTING AGENTS

C 05551 HERNANDEZJ 13476 BAUDILLECHRISTOPHER SLAYTON

ARRESTED AT/NEAR

[redacted] UNITED STATES

RECORD OF DEPORTABLE/EXCLUDABLE ALIEN:

Immigration and Customs Enforcement (ICE) is currently executing at-large operations, targeting immigration violators in the Philadelphia Area of Responsibility. The operational focus is in direct support of Presidential Executive Orders. Operations are executed while ensuring personnel safety and maintaining tactical control operating in a confined, civilian-heavy environment. The operation integrates personnel from the Department of Homeland Security (DHS), Enforcement and Removal Operations (ERO), Homeland Security Investigations (HSI), Internal Revenue Service (IRS), Drug Enforcement Administration (DEA), the US Marshals Service (USMS), with additional support from 287(g) partners in their assigned jurisdictions. The operation aims to enhance public safety and enforce immigration laws.

ENCOUNTER:

On 04/08/202 [redacted] fugitive enforcement operation at [redacted] where there was credible information [redacted] r referred to as OROZCO-FELIX), would be present. During the operation Officers were identified by ICE badges, vest and insignia. At approximately 10:30hours, Officers went inside the Court house located at address 2901 Dutton Mill Road, Suite 120, Ashton, PA and encountered a male with the same physical characteristics as OROZCO-FELIX. Through previous arrest/immigration photos, Officers positively identified the male as OROZCO-FELIX the target of the operation. A brief field interview was conducted to determine if any unknown humanitarian issues existed that would delay or dissuade ICE from taking OROZCO-FELIX into custody. No compelling issues arose that would prevent the arrest of OROZCO-FELIX being apprehended and were placed in hand restraints, searched, and placed into custody. OROZCO-FELIX was placed into a service vehicle and transported to the Philadelphia Field Office for processing without further incident.

PERSONAL BIOGRAPHY:

Upon arrival at the ERO Philadelphia Field Office , a biographical interview was completed. The following information is a collection of information ascertained from the subject: OROZCO-FELIX makes no claims to US citizenship. OROZCO-FELIX claims that they are a citizen and national of GUATEMALA, by virtue of birth in the same. OROZCO-FELIX claims to be single and to have no children residing in the United States. OROZCO-FELIX claims that they have never served or trained with the United States armed forces. OROZCO-FELIX claims to be in good overall medical condition and not under the care of any healthcare practitioner. OROZCO-FELIX claims to have no fear of returning to GUATEMALA for any political or religious

Signature	Title
C 05551 HERNANDEZ	Deportation Officer

Alien's Name	File Number	Date
OROZCO FELIX, MARIO RAUL	[redacted] Event No: [redacted]	04/08/2026

purposes. OROZCO-FELIX claims that they are not a member of any criminal or terrorist organizations.

IMMIGRATION HISTORY:
OROZCO-FELIX is not a citizen, national, resident or arriving alien in the United States.
OROZCO-FELIX is a citizen and national of GUATEMALA by virtue of birth in GUATEMALA.
On January 29, 2023, the subject was arrested by the United States Border Patrol in the El Paso, Texas.
USBP processed the subject with a Notice To Appear alleging 212(a)(6)(A)(i) of the Immigration and Nationality Act.
On March 29, 2023, the subject was Released on an Order of Recognizance (OREC)
The subject next immigration hearing is scheduled for August 20, 2026.
On March 3, 2026, the subject was criminally charged with DUI, Fleeing or Attempting to Elude Officers and Accident involving Damage.
Driving Under the Influence is a violation of the Laken Riley Act requiring mandatory detention.
On March 4, 2026, ICE lodged a Detainer on OROZCO-FELIX while he was held in Delaware County Prison.
The Delaware County Prison did not honor the ICE Detainer and released the subject without notification.
ERO made the determination to reconsider the subjects custody determination to detained.
On March 12, 2026, ERO Philadelphia Issued and I-200 ICE Warrant of Arrest, to locate and arrest OROZCO-FELIX.

CHARGES/ALLEGATION:
Based on the aforementioned analysis, this officer has concluded that OROZCO-FELIX is in violation of the following section(s) of the Immigration & Nationality Act and as such, should be brought before an Immigration Judge or a Designated Official to answer to these allegations:
212(a)(7)(A)(i)(I) of the Immigration and Nationality Act (Act), as amended, as an immigrant who, at the 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.
212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

CRIMINAL HISTORY
On or about March 3, 2026, OROZCO-FELIX was arrested by Pennsylvania State Police - Media Barracks for the following violations of the Pennsylvania Consolidated Statute;
Title 75 Section 3802A1 Driving Under the Influence
Title 75 Section 3733A Fleeing or Attempting to Elude Officer
Title 75 Section 3743A Accidents Involving Damage Vehicle/Property
DISPOSITION: Currently in Court, subject released on bail Next Court Date Scheduled for 05/20/2026.

MISC [redacted] ERS:
FBI:
FINS
SID:
CEDU
PASSPORT#:

DISPOSITION:
OROZCO-FELIX was advised of his right to counselor notification.

Signature	Title
C 05551 HERNANDEZ	Deportation Officer

U.S. Department of Homeland Security **Continuation Page for Form I-213**

Alien's Name	File Number	Date
OROZCO FELIX, MARIO RAUL	[redacted] Event No: [redacted]	04/08/2026

OROZCO-FELIX was provided with a list of free & low-cost legal services.
OROZCO-FELIX was offered one free phone call.
OROZCO-FELIX was served as a Custody Redetermination
OROZCO-FELIX will be detained without bond.

OTHER IDENTIFYING NUMBERS

ALIEN-[redacted]
State Criminal Number/State Bureau Number [redacted] (UNITED STATES)

Signature	Title
C 05551 HERNANDEZ	Deportation Officer

CERTIFICATE OF SERVICE

I certify that, on this date, I filed the foregoing Response in Opposition to Petition for Writ of Habeas Corpus via the Court's CM/ECF System, thereby making it available for viewing and download for all parties to the case.

Dated: April 17, 2026

/s/ Fernando I. Rivera
FERNANDO I. RIVERA
Assistant United States Attorney