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

Victor Hugo ARNAO BRAVO

Petitioner, Case No._____

: Before the Honorable _____=

JL JAMISON, in his official capacity as warden of Federal Detention Center in Philadelphia; ~~BRIAN MCSHANE, in his official capacity as Acting Philadelphia Field Office Director, United States Immigration and Customs~~ Enforcement; TODD LYONS, in his Official capacity as Acting Director of Immigration and Customs Enforcement; MARKWAYNE MULLIN, in his official capacity as: Secretary of the Department of Homeland Security; THE U.S. DEPARTMENT OF HOMELAND SECURITY;TODD BLANCHE,: Acting Attorney General of the United States

Respondents.:

PETITION FOR WRIT OF HABEAS CORPUS

Victor Hugo ARNAO BRAVO, submits this petition for a Writ of Habeas Corpus pursuant to 28 U.S.C. 2241 and the Suspension Clause (Article l , Section 9, Clause 2)

of the United States Constitution. Petitioner requests that this Court release him from detention by the Immigration and Customs Enforcement

("ICE") or, alternatively, conduct or order a bond hearing in which the Respondents bear the burden of justifying Petitioner's continued detention. Petitioner also requests that the Court set aside recent policies implemented by Respondents that are contrary to the statutory right of non-citizens like Petitioner to seek release and bail through an exercise of the Respondents' discretion.

Mr. Arnao Bravo is a native of Peru and has been physically present in the United States since he was paroled into the United States on November 23, 2022. Attached as Exhibit A is a copy of that parole document.

On or about April 17, 2026, Mr. Arnao Bravo was on his way to work when he was approached by agents of the Immigration and Naturalization Service, and ultimately apprehended and detained by those same agents. He was taken initially to the office at 114 North 8th Street in Philadelphia, Pennsylvania. He was thereafter transferred to the Federal Detention Center, where he is currently located.. Attached as Exhibit B is proof of his current physical presence at the FDC. Mr. Arnao Bravo has no outstanding criminal warrants or convictions, and it is believed that he was taken into custody pursuant to a directive from headquarters setting a specific quota for apprehension. . Respondents arbitrarily detained, Mr. Arnao Bravo despite the requirement under 8 U.S.C. 1226(a) and its implementing regulations that immigration

officials make an individualized custody determination. Moreover, Respondents have adopted policies enshrined in administrative decisions by the Board of Immigration Appeals ("BIA") that subject non-citizens like Mr. Leiva Pinto to mandatory detention in violation of Section 1226(a).

Mr. Arnao Bravo is presently detained at Federal Detention Center in Philadelphia Pennsylvania.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241 (habeas corpus); 28 U.S.C. 1651 (All Writs Act); 28 U.S.C. 1331 (federal question); 5 U.S.C. 702 (Administrative Procedures Act); U.S. Const. amend. V (Due Process Clause); and U.S. Const. art. I, 9, cl. 2 (Suspension Clause).

2. Venue is proper in the Eastern District of Pennsylvania pursuant to 28 U.S.C. 1391(b) and 28 U.S.C. 2241(d), because at the time of filing his Petition for Writ of Habeas Corpus (Doc. 1), Mr. Arnao Bravo is imprisoned at the Federal Detention Center ("FDC") in Philadelphia, Pennsylvania.

PARTIES

3. Petitioner Victor Arnao Bravo is a native of Peru who has been present in the United States for approximately three and a half (3 ½) years and is the

beneficiary of a pending application for asylum. Attached as Exhibit C is proof of the pending asylum application. As noted supra, he is detained at the Federal Detention Center in Philadelphia, PA.

4. Respondent JL Jamison is named in his official capacity as the Warden of Federal Detention Facility in Philadelphia, PA, which detains individuals suspected of civil immigration violations. Respondent Jamison is the immediate physical custodian responsible for the detention of Petitioner.

5. Respondent Brian McShane is the Acting Philadelphia Field Office Director for Immigration and Customs Enforcement's ("ICE") Enforcement and Removal Operations. In this capacity he is responsible for the custody of all noncitizens detained by ICE at FDC, Philadelphia, where the Petitioner is currently detained, and has the authority to order the release Arnao Bravo or transfer him to a different facility. He is one of Mr. Arnao Bravo's immediate custodians and is sued in his official capacity.

6. Respondent Todd Lyons is the Acting Director of ICE. In this capacity he is responsible for enforcing immigration laws, and as such is a legal custodian of Mr. Arnao Bravo. He is sued in his official capacity.

7. Respondent Markwayne Mullin is Secretary of Homeland Security. In this capacity she runs the Department of Homeland Security, and is charged

pursuant to 8 U.S.C. 1 103(a)(l) with administering and enforcing immigration laws. He is the ultimate legal custodian of Mr. Arnao Bravo, and is sued in his official capacity.

8. The Department of Homeland Security ("DHS") is the agency of the federal government responsible for enforcing the immigration laws. DHS is also Mr. Arnao Bravo's legal custodian.

9. Respondent Todd Blanche is the Acting Attorney General of the United States and the head of the U.S. Department of Justice, which encompasses the Board of Immigration Appeals ("BIA") and immigration courts, known collectively as the Executive Office of Immigration Review ("EOIR"). Mr. Blanche shares responsibility for the implementation and enforcement of immigration laws along with Respondent Noem. Mr. Blanche is a legal custodian of Mr. Arnao Bravo. He is sued in his official capacity.

LEGAL FRAMEWORK

10. For non-citizens attempting to the enter the United States, the INA provides under 8 U.S.C. 1225(b)(2)(A) that "in the case of [a non-citizen] 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." "A noncitizen detained under Section 1225(b)(2) may be released

only if he is paroled 'for urgent humanitarian reasons or significant public benefit' pursuant to 8 U.S.C. 1182(d)(5)(A)." Gomes v. Hyde, 25 Civ. 11571, 2025 WL 1868288, at *2 (D. Mass. July 7, 2025) (quoting Jennings v. Rodriguez, 583 U.S. 281, 300 (2018)).

11. In contrast, the Supreme Court has found that "U.S. immigration law authorizes the Government to detain certain [non-citizens] already in the country pending the outcome of removal proceedings under 1226(a) and (c)."

Jennings, 583 U.S. at 288-89.

12. Section 236 of the INA provides in relevant part as follows:

> (a) Arrest Detention and Release. On a warrant issued by the Attorney General, an alien may be arrested and detained pending a decision on whether the alien is to be removed from the United States. Except as provided in subsection (c) and pending such decision, the Attorney General—
>
> (l) may continue to detain the arrested alien; and
>
> (2) may release the alien on—
>
> (A) bond of at least $1 ,500 with security approved by, and containing conditions prescribed by, the Attorney General; or (B) conditional parole ...

13. The Supreme Court has interpreted similar "may" language in other provisions of the INA to require "some level of individualized determination." I.N.S. v. Nat'l Ctr. For Immigrants ' Rights, 502 U.S. 183, 194 (1991). The regulation implementing Respondents' authority to arrest non-citizens present in the United States reads:

> "Any officer authorized to issue a warrant ofarrest may, in the officer's discretion, release an alien not described in [8 U.S.C. § 1236(c)(l)] of the Act, under the conditions at section [8 U.S.C. § 1236(a)(2) and (3)]; provided that the alien must demonstrate to the satisfaction ofthe officer that such release would not pose a danger to property or persons, and that the alien is likely to appearfor any future proceeding.„
>
> 8 U.S.C.1236.1

14. Noncitizens may request a review of an initial custody determination before an Immigration Judge ("IJ"). 8 C.F.R. 1236. I (d)(l); 8 C.F.R. § 1002.19(a). At this hearing an IJ may make the decision "upon any information that is available to the [Immigration Judge] or that is presented to him or her by the [non-citizen] or the [government]." 8 C.F.R. 1003.19(d)•, see also Matter of Guerra, 24 1&N Dec. 37, 39 (BIA 2006). Non-citizens may appeal a negative decision in a custody review before an IJ to the Board of Immigration Appeals. 8 C.F.R. 1236. I(d)(3)(i). The current statutory scheme was created through the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 ("IIRIRA").

15. For the first time in nearly three decades, Respondents have taken the position through a series of precedential decisions by the Board of Immigration Appeals that non-citizens residing in the interior of the United States are not entitled to a custody redetermination (a "bond hearing") before an Immigration Judge.

16. First, in Matter of Q. Li, 29 Dec. 66 (BIA 2025), the BIA held that a non-citizen who had been apprehended at the border and subsequently released into the United States is subject to mandatory detention without a possibility of bail upon re-detention, pursuant to 8 U.S.C. 1225(b), even if that re-detention occurs years after their initial release from custody. The BIA reasoned that "an applicant for admission who is arrested and detained without a warrant while in the process of arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings is detained under section [1225(b)] [J, and is ineligible for any subsequent release on bond under section [1226(a)]." Q. Li, 29 Dec. at 74.

17. Then in Matter of Yajure Hurtado, 29 1&N Dec. 216 (BIA 2025), the BIA stated that all non-citizens who are present in the United States without admission are subject to mandatory detention under Section 1225(b), regardless of how long they have been residing in the U.S. and absent any prior interaction with immigration authorities.

FACTS AND PROCEDURAL HISTORY

1 8. Mr. Arnao Bravo is a native of Peru;

19. On November 23, 2022, Mr. Arnao Bravo entered the United States via the US Border and was paroled into the United States;

20. Prior to April 17, 2026, Mr. Arnao Bravo had never had any contact with agents of the Department of Homeland Security other than his initial entry and parole, although he was scheduled for a check-in in August of this year;

21. Mr. Arnao Bravo settled into the Philadelphia area, where he has been living at the following address: [redacted]. He has been gainfully employed, and has employment authorization, proof of which is attached as Exhibit D;

22. As noted supra, Mr. Arnao Bravo is also the beneficiary of a pending asylum application, proof of which has already been submitted with this filing;

23. As noted supra, on or about April 17, 2026, Mr. Arnao Bravo was on his way to work when he was apprehended and detained by agents of the Immigration and Customs Enforcement, and taken initially to the office at 114 North 8th Street in Philadelphia, Pennsylvania. He was thereafter transferred to the Federal Detention Center, where he is currently located..

CLAIM FOR RELIEF

COUNT ONE VIOLATION

OF DUE PROCESS, U.S.

CONST. AMEND. V

24. Petitioner repeats and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

25. The Fifth Amendment's Due Process Clause prevents the Government from depriving any person of "life, liberty, or property, without due process of law." U.S. Const. amend. V.

26. The Due Process Clause extends to noncitizens residing in the United States, whether they have lawful status or not. See Mathews v. Diaz, 426 U.S. 67, 77 (1976); Zadvydas v. Davis, 533 U.S. 678, 693 (2001). Specifically, "[i]t is well established that the Fifth Amendment entitles [non-citizens] to due process of law in deportation proceedings. Reno v. Flores, 507 U.S. 292, 306 (1993); see also Abdulai v. Ashcroft, 239 F.3d 542, 549 (3d Cir. 2001) ("[Non-citizens] facing removal are entitled to due process"); Calderon-Rosas v. Atty ' Gen., 957 F.3d 378, 386 (3d Cir. 2020) ("In sum, petitioners seeking discretionary relief are entitled to fundamentally fair removal proceedings, which constitutes a protected interest supporting a due process claim.").

27. Evaluating the adequacy of the process provided to a non-citizen requires a balancing of factors. "First, the private interest that will be affected by the official action; second, the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and finally, the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." Mathews v. Eldridge, 424 U.S. 319, 335 (1976).

28. First, Mr. Arnao Bravo faces "the most significant liberty interest there is—the interest in being free from imprisonment." Velasco Lopez v. Decker, 978 F.3d 842, 851 (2d Cir. 2020) (citing Hamdi v. Rumsfeld, 542 U.S. 507, 529 (2004)). Second, Respondents have erroneously deprived Mr. Arnao Bravo of his liberty without any individualized assessment of his circumstances. Third, Respondents did not make any individualized finding that Mr. Arnao Bravo was a danger or flight risk, so there does not appear to be a significant government interest in detaining him, particularly since he was paroled into the United States, has a pending application for relief and has been gainfully employed since his last admission'

29. An application of these factors requires that Mr. Arnao Bravo should have been provided with additional process before being detained.

//

COUNT TWO

VIOLATION OF THE IMMIGRATION AND NATIONALITY ACT, 8 U.S.C. 12260)

31. Petitioner repeats and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

32. The mandatory detention provision at 8 U.S.C. 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to grounds of inadmissibility. As, relevant here, it does not apply to those who have been residing in the United States at liberty after being briefly detained at or near the border. Such noncitizens, if detained, are done so under 1226(a), and are generally eligible release on bond.

33. Respondents' authority to detain Mr. Arnao Bravo is derived from 8 U.S.C. 1226(a) as Mr. Arnao Bravo is already present in the United States.

34. Respondents have detained Mr. Arnao Bravo without making an individualized determination regarding whether he posed a danger or flight risk as required by 8 U.S.C. 1226(a) and its regulations.

35. Moreover, Respondents' current policies as set forth in the BIA's decisions in Matter of Q. Li and Matter of Yajure Hurtado unlawfully prevent Mr. Arnao Bravo from obtaining a custody redetermination in front of an Immigration Judge as is his right by statute.

COUNT THREE

VIOLATION OF THE BOND REGULATIONS, 8 C.F.R. 236.1, 1236.1 and 1003.19

36. Petitioner repeats and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

37. In 1997, after Congress amended the INA through IIRIRA, EOIR the then-Immigration and Naturalization Service issued an interim rule to interpret and apply IIRIRA. Specifically, under the heading of "Apprehension, Custody, and Detention of [Non-citizens]," the agencies explained that "[d]espite being applicants for admission, [noncitizens] who are present without having been admitted or paroled (formerly referred to as [noncitizens] who entered without inspection) will be eligible for bond and bond redetermination. " 62 Fed. Reg. at 10323 (emphasis added). Thus, the agencies made clear that non-citizens present in the United States would be eligible for consideration for bond and bond hearings before IJs under 8 U.S.C. 1226 and its implementing regulations.

38. Yet, Respondents have adopted a policy and practice of applying § 1225(b)(2) to non-citizens like Mr. Arnao Bravo who are present in the United States without being admitted or paroled, or who have been apprehended, then paroled and released from custody.

39. The application of 1225(b)(2) to Mr. Arnao Bravo unlawfully mandates his continued detention in violation of 8 C.F.R. 236. l, 1236.1, and 1003.19.

COUNT FOUR

VIOLATION OF THE ADMINISTRATIVE PROCEDURE ACT ("APA"), 5 U.S.C. 701, et. seq.

40. Petitioner repeats and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

41. Mr. Arnao Bravo is aggrieved by agency action under the Administrative Procedure Act, 5 U.S.C. 701 et. seq. Specifically, Respondents have acted arbitrarily in detaining Mr. Arnao Bravo without conducting an individualized determination into his circumstances. In other words, Respondents have not presented any indication that Mr. Arnao Bravo's circumstances have changed such that he is now a danger or flight risk in a way that he was not when he entered the country in 2023, and was granted release on parole;.

42. Additionally, Respondents' recent policies announced through administrative decisions issued by the BIA unlawfully withhold the right to a bond

hearing under 8 U.S.C. 1226(a) to Mr. Arnao Bravo, and make any exhaustion of his remedies moot.

43. These policies are arbitrary, capricious, and not in accordance with the text of the INA.

PRAYER FOR RELIEF

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

Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner from custody immediately on his own recognizance or under parole, bond or reasonable conditions of supervision, on the ground that his continued detention by the Department of Homeland Security violates his Due Process rights;

Set aside Respondents' unlawful detention policy contained Matter of Q. Li and Matter of Yajure Hurtado under the APA, 5 U.S.C. 706(2), as contrary to law, arbitrary and capricious, and contrary to constitutional right;

Issue a writ requiring an immediate, constitutionally adequate hearing before an Immigration Judge, at which: (i) DHS bears the burden to demonstrate, by clear and convincing evidence, that Petitioner's continued detention is necessary, and (ii) the immigration judge considers Petitioner's ability to pay a bond.

While this petition is pending, order Petitioner's immediate release pursuant to the Court's inherent authority to release habeas corpus petitioners on bail;

Enter a judgment declaring that Respondents' detention of Petitioner is unauthorized by statute and contrary to law and the U.S. Constitution;

Award Petitioner reasonable costs and attorneys' fees;

Grant any further relief that this Court may deem fit and proper.

Dated: April 20, 2026

Respectfully submitted,



Christine M. Flowers, Esquire
(PA Bar 51181)
Joseph M. Rollo and Asociates PC
2527 South Broad Street
Philadelphia PA 19148
(215)271-5550
team@rollolawoffice.com
ATTORNEY FOR PETITIONER

28 U.S.C. § 2242 VERIFICATION STATEMENT

I am submitting this verification on behalf of the Petitioner because I am the Petitioner's attorney. I have discussed with the Petitioner the events described in this Petition and Complaint. On the basis of those discussions, I hereby verify that the statements made in this Petition and Complaint are true and correct to the best of my knowledge.

DATED: 4-20-2026

Christine M. Flowers, Esquire

LIST OF EXHIBITS

Ex. A. Parole Document of Petitioner dated November 23, 2022

Ex. B Detainee Locator Proof of Physical Presence at the FDC

Ex. C Proof of a Pending Asylum Application

Exh. D. Proof of Approved Employment Authorization

EXHIBIT A

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

PD G-56

File Number: [redacted] DOB: [redacted]

Name: VICTOR HUGO ARNAO-BRAVO Date: 11/23/2022

Home Address: [redacted]

Please present this notice to your local ICE office upon request

OFFICE LOCATION	ICE Field Offices are listed on the attached document entitled "*ICE Field Offices*." Please call 1-888-351-4024 if you need assistance in locating or reporting to your local ICE office.
DEADLINE	You must report your local ICE office within 60 days of release.
REQUEST	ICE Deportation Officer for continued processing and consideration for enrollment in ATD.
REASON FOR APPOINTMENT	You have been released in the discretion of U.S. Customs and Border Protection in the United States and are now required to contact your local ICE Field Office to complete processing. Contacting ICE will ensure that DHS has your address and contact information up to date. Once you contact ICE for the first time, ICE will evaluate how you can meet the continuing filing requirements which may include in-person reporting. Failure to contact the local ICE office may lead to you being taken into custody or placed on additional forms of supervision or monitoring.
BRING WITH YOU	Identification document (birth certificate, government-issued identity documents such as a driver's license or cédula) and all immigration documents.

FAILURE TO CONTACT THE LOCAL ICE OFFICE AS INSTRUCTED MAY RESULT IN YOUR ARREST AND/OR A LOSS OF THE RIGHT TO ANY POSSIBLE RELIEF. THANK YOU FOR YOUR COOPERATION.

DEPARTMENTO DE SEGURIDAD INTERNA
Servicio de Inmigración y Control de Aduanas de los Estados Unidos

Numero del Expediente: [redacted] Fecha de Nacimiento: [redacted]

PD G-56

Nombre: VICTOR HUGO ARNAO-BRAVO Fecha: 11/23/2022

Domicilio: [redacted]

Favor de presentarse con este aviso en la oficina local de ICE cuando sea solicitado

UBICACIÓN DE LA OFICINA	Las oficinas locales de ICE están enumeradas en el documento adjunto titulado "Oficinas Locales de ICE". Favor de llamar al 1-888-351-4024 si usted necesita asistencia en localizar o reportarse a su oficina local de ICE.
FECHA LÍMITE	Debe presentarse en su oficina local de ICE en los 60 días siguientes de su puesta en libertad.
SOLICITUD	Preséntese ante un Oficial de Deportación de ICE para que continúe su tramitación y consideración para su inscripción en un Programa Alternativo a la detención (ATD, por sus siglas en inglés).
MOTIVO DE LA CITA	Usted ha sido puesto en libertad a discreción del Servicio de Aduanas y Protección Fronteriza de los Estados Unidos y ahora debe ponerse en contacto con su oficina local para completar la tramitación. Reportarse con ICE asegurará de que el Departamento de Seguridad Interna (DHS, por sus siglas en inglés) tiene su domicilio e información de contacto actualizados. Una vez que se presente con ICE por primera vez, será evaluado para cumplir con los requisitos de presentación continua que pueden incluir la presentación en persona. El no reportarse a la oficina local de ICE puede resultar en su detención o se le coloque en formas adicionales de supervisión o monitoreo.
TRAIGA CON USTED	Documentos de identificación (acta de nacimiento, documentos de identidad emitidos por el gobierno, tales como licencia de conducir o cédula) y todos los documentos de inmigración.

Plazo de un Año de la Solicitud de Asilo: Si usted cree que puede reunir los requisitos para el asilo, debe presentar el Formulario I-589, la Solicitud de Asilo y de Retención de Expulsión. El Formulario I-589, instrucciones, y la información sobre dónde presentar el Formulario se pueden encontrar en www.uscis.gov/i-589. Si no presenta el Formulario I-589 en el plazo de un año desde su llegada, no podrá solicitar asilo de acuerdo con el artículo 208(a)(2)(B) de la Ley de Inmigración y Nacionalidad.

SI NO SE PRESENTA COMO SE LE HA INDICADO, PUEDE SER DETENIDO Y/O PERDER EL DERECHO A CUALQUIER POSIBLE RECURSO. GRACIAS POR SU COOPERACIÓN.

FINS #: [redacted] Subject ID: [redacted] Event No: [redacted]

1. FAMILY NAME (Capital Letters) First Name Middle Name	2. Age	3. Country of Citizenship
ARNAO-BRAVO, VICTOR HUGO	42	PERU

4. Alias	5. Date Apprehended	6. Office
	November 17, 2022	ELC/CAX

7. Birth Date	8. Birth Place	
[redacted]	LIMA, PERU, PERU	
9. Sex ☒ Male ☐ Female	10. OSC/WA Served ☐ Yes ☒ No (Explain)	
11. File Number [redacted]	12. Bond $ Date Posted	
13. CINS ☐ Yes ☐ No	14 Medical Alert ☐ No ☐ Yes (Explain)	

[redacted]
14 A.

15. TRANSFER DATE	FROM	TO
A		
B		
C		

16. ADMITTED BY:	19. RELEASED TO: ☐ V/R ☐ Deport	22. Rt. Index Print – In	23. Rt. Index Print - Out
17. SEARCHED IN BY:	20. RELEASED BY:		
18. DATE ADMITTED:	21. DATE RELEASED:		
24. Remarks: See I-831			

FORM I-385 (08/01/07) ALIEN BOOKING RECORD
UNITED STATES DEPARTMENT OF HOMELAND SECURITY

[redacted]

CONTROL Name (Last, First, Middle) ARNAO-BRAVO, VICTOR HUGO						
Birthdate [redacted]	Age 42	Marital Status ☒ Single ☐ Separated	☐ Widowed ☐ Married ☐ Divorced	File Number [redacted]		
Sex M	Hair BLK	Eyes BRO	Complexion MED	Height 66	Weight 185	Scars or Marks None Indicated
U.S. Address/Mail (Number) (Street) (City) (State) (ZIP CODE) [redacted]						
Alien's Telephone # [redacted]			Date of Action 11/23/2022		Location Code CAX	
City, Province (State) and Country of Birth LIMA, PERU, PERU				Country of Citizenship PERU		
Date, Place, Time, and Manner of Last Entry/Attempted Entry 11/17/2022, 1351, 32 mile(s) E of CAL, PWA (AFOOT)				Status at Entry PWA Mexico		
Foreign Address/Residence (Number, Street, City, Province (State), Country) LIMA, PERU PERU						
Method of Location/Apprehension PB UNKNOWN		(At/Near) CALEXICO, CA		Date & Hour 11/17/2022 1358		

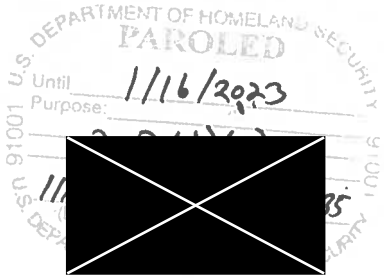


EXHIBIT B

Official Website of the Department of Homeland Security

Report

Main Menu

Search Results: 1

VICTOR HUGO ARNAO-BRAVO

Country of Birth : Peru

A-Number: [redacted]

Status : In ICE Custody

State: PA

Current Detention Facility: Philadelphia Federal Detention Center

** Click on the Detention Facility name to obtain facility contact information*

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

CERTIFICATION OF SERVICE

I, Christine M. Flowers, Esquire, hereby certify that this pleading was served via the electronic filing service on all parties via CM/ECF System on April 20, 2026

April 20, 2026

CHRISTINE M. FLOWERS, ESQUIRE

JOSEPH M ROLLO AND ASSOCIATES, PC

10/2024

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

Place of Accident, Incident, or Transaction: PHILADELPHIA PA

RELATED CASE IF ANY: Case Number: N/A Judge: N/A

1. Does this case involve property included in an earlier numbered suit? Yes ☐
2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? Yes ☐
3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? Yes ☐
4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? Yes ☐
5. Is this case related to an earlier numbered suit even though none of the above categories apply? If yes, attach an explanation. Yes ☐

I certify that, to the best of my knowledge and belief, the within case ☐ **is** / ☑ **is not** related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☐ 10. Civil Rights
- ☑ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief ***see certification below***
- ☐ 16. All Other Federal Question Cases. *(Please specify)*: _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (*Please specify*): _____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: *(Please specify)* _____

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ **does** / ☐ **does not** have implications beyond the parties before the court and ☐ **does** / ☐ **does not** seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

☑ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of $150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☐ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.