U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

May 6, 2026

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

Re: *Jiang v. Genalo, et al.*, 26-cv-2692 (Brown, J.)

Dear Judge Brown:

This Office represents Respondents in the above captioned habeas petition filed by Petitioner Yuhang Jiang ("Petitioner"). Docket Entry ("DE") #1. Petitioner was arrested on April 22, 2026.

This letter is respectfully submitted pursuant to Your Honor's Standing Order dated March 7, 2026. 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 [or] gang affiliation, and the like". *See* DE # 3.

Immigration and Customs Enforcement has advised the undersigned that Petitioner was arrested on April 22, 2026 by Nassau County Police Department for Criminal Possession of a Controlled Substance in the 5th Degree: Intent to Sell, in violation of NY PL 220.06(1). Petitioner's RAP sheet does not yet show that these charges have been filed with a criminal court.

On June 6, 2023, Petitioner was arrested by the Nassau County Police Department for Possession of a Forged Instrument in the 2nd Degree (PL 170.25); Identity Theft in the 2nd Degree (PL 190.79(1); and Petit Larceny (PL 155.25). On August 25, 2023, Petitioner was convicted of Criminal Trespass in the 2nd Degree (PL 130.15). Petitioner was sentenced to a conditional discharge and ordered to complete 50 hours of community service.

Petitioner had a Master Calendar Hearing scheduled today, at which he appeared with counsel. That matter was continued to May 13, 2026.

Based upon Petitioner's criminal history, Respondents respectfully submit that Petitioner should not be released on his own recognizance, as provided in the Court's standing order.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/ Megan J. Freismuth
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