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RAFAEL OSWALDO QUINTANILLA HERNANDEZ

*Petitioner*,

V.

MARKWAYNE MULLIN *Secretary of the Department of Homeland Security*, TODD M. LYONS, *Acting Director, United States Immigration and Customs Enforcement*, in their official capacity, WILLIAM JOYCE, *Deputy Director of the New York Field Office of U.S. Immigration and Customs Enforcement*, in their official capacity, TODD BLANCHE, *Acting Attorney General of the United States,* RAUL MALDONADO, JR., *Warden of the Metropolitan Detention Center,* in their official capacity

*Respondents*.

**Case File No: 26-3340**

**PETITION FOR WRIT OF HABEAS CORPUS**

## INTRODUCTION

1. Petitioner, Rafael Quintanilla Hernandez ("Petitioner"), [redacted], is a native and citizen of El Salvador who, upon information and belief, has resided in the United States continuously since approximately 2017.

2. On or around May 4, 2026 Petitioner was driving a vehicle lawfully registered to his uncle, who holds lawful immigration status in the United States, when he was stopped by officers in an unmarked vehicle shortly after leaving a public park. Upon information and belief, the officers were agents of the Department of Homeland Security. The officers did not identify their agency

or any lawful authority for the stop, did not state any lawful basis for the stop, and immediately opened the vehicle door and forcibly removed Petitioner. In the course of the seizure, the officers deployed a taser against Petitioner multiple times and slammed his head against the ground.

3. Petitioner was transported to a hospital, where the taser probes were removed from his body. According to Petitioner, hospital staff sought to perform a scan of his head, but the officers did not permit them to do so. Petitioner was then taken to what he believes was a police station, where his fingerprints were taken. It was only through this process that the officers purported to ascertain Petitioner's identity.

4. Petitioner was thereafter served with immigration paperwork at that location. It is unclear precisely what documents Petitioner was served with, and whether Respondents complied with the procedures required by 8 C.F.R. § 241.8 before purporting to reinstate any prior order of removal. Petitioner was subsequently transferred to the Metropolitan Detention Center, where he remains detained.

5. Petitioner's seizure and arrest were effected without reasonable suspicion, without probable cause, and without a judicial warrant, in violation of the Fourth Amendment to the United States Constitution, 8 U.S.C. § 1357(a)(2), and 8 C.F.R. § 287.8. Upon information and belief, the officers made no individualized determination that Petitioner was likely to escape before a warrant could be obtained, as both statute and regulation require.

6. Petitioner's continued detention flows directly from, and is wholly predicated upon, this unlawful arrest. Because Petitioner's detention is the direct product of that unlawful arrest, he is entitled to release.

7. Separately, to the extent Respondents may purport to detain Petitioner on the basis of a reinstated order of removal, Respondents failed to comply with the mandatory procedures set forth at 8 C.F.R. § 241.8, which require that an officer confirm the existence of a prior order, verify the noncitizen's identity, determine that the noncitizen unlawfully reentered, and then serve written notice of the determination and afford the noncitizen the opportunity to make a written or oral statement contesting it. Respondents' failure to follow their own binding regulations renders the resulting agency action, and Petitioner's consequent detention, unlawful.

8. Petitioner seeks a writ of habeas corpus ordering his immediate release from unlawful custody. In the alternative, Petitioner seeks an order directing Respondents to provide a prompt, constitutionally adequate, and individualized custody determination before a neutral decision-maker with authority to order release. For the reasons set forth below, the Court should grant the writ and restore Petitioner's liberty.

## JURISDICTION AND VENUE

9. This Court has jurisdiction pursuant to 28 U.S.C. § 2241 (the general grant of habeas authority to the district courts); Article I, § 9, cl. 2 of the United States Constitution (the "Suspension Clause"); 28 U.S.C. § 1331 (federal question jurisdiction); and 28 U.S.C. §§ 2201 and 2202 (the Declaratory Judgment Act).

10. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.

11. A district court's authority includes jurisdiction to hear habeas challenges to immigration-related detention. *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001).

12. Federal courts also have federal question jurisdiction, through the Administrative Procedure Act, to "hold unlawful and set aside agency action" that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706(2)(A). APA claims are cognizable on habeas. 5 U.S.C. § 703. The APA affords a right of review to a person who is "adversely affected or aggrieved by agency action." 5 U.S.C. § 702.

13. Venue is proper in this district pursuant to 28 U.S.C. § 2241(c)(3) and 28 U.S.C. § 1391(b)(2) and (e)(1). Petitioner was seized and arrested in Nassau County, New York, within the Eastern District of New York, and is currently detained at the Metropolitan Detention Center within this District. In a habeas action challenging present physical confinement, the proper respondent is the warden of the facility where the petitioner is held, and the district of confinement is the proper venue. *Rumsfeld v. Padilla*, 542 U.S. 426, 443 (2004).

**REQUIREMENTS OF 28 U.S.C. § 2243**

14. The Court must grant the petition for a writ of habeas corpus or issue an order to show cause to Respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require Respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

15. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963).

## PARTIES

16. Petitioner is a native and citizen of El Salvador. He was seized and arrested in Nassau County, New York, and is currently detained by U.S. Immigration and Customs Enforcement at the Metropolitan Detention Center in Brooklyn, New York.

17. Respondent Raul Maldonado, Jr. is the Warden of the Metropolitan Detention Center in Brooklyn, New York, where Petitioner is currently detained. He is Petitioner's immediate physical custodian. He is sued in his official capacity.

18. Respondent William Joyce is the Deputy Field Office Director for ICE's New York City Field Office, which maintains responsibility over Nassau and Kings Counties. He is a legal custodian of Petitioner and is sued in his official capacity.

19. Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and Customs Enforcement, the agency that is detaining Petitioner. He is sued in his official capacity.

20. Respondent Markwayne Mullin is the Secretary of the Department of Homeland Security. He oversees DHS, which oversees ICE, and is responsible for administering and enforcing the immigration laws of the United States. He is sued in his official capacity.

21. Respondent Todd Blanche is the Attorney General of the United States. He oversees the immigration court system, which is housed within the Executive Office for Immigration Review ("EOIR") and includes all Immigration Judges and the Board of Immigration Appeals ("BIA"). He is sued in his official capacity.

## STATEMENT OF FACTS

22. Upon information and belief, Petitioner first entered the United States in or about 2015. Petitioner most recently entered the United States in or about 2017 without detection and has

resided in the United States since that time. At the time of filing, it is unclear by what legal mechanism Petitioner departed or was removed from the United States following his initial entry.

23. On or about May 4, 2026, after leaving a public park, Petitioner was driving, with permission, a vehicle lawfully registered to his uncle, who holds lawful immigration status in the United States.

24. While Petitioner was driving, he was stopped by officers in an unmarked vehicle. Upon information and belief, the officers were agents of the Department of Homeland Security, and they did not identify their agency or any lawful authority for the stop.

25. Upon information and belief, the officers possessed no specific, articulable facts giving rise to a reasonable suspicion that Petitioner was engaged in any offense or was a noncitizen unlawfully present in the United States, and had no information regarding Petitioner's identity at the time of the stop.

26. Upon stopping Petitioner, the officers immediately opened the door of the vehicle and forcibly removed and detained Petitioner. In doing so, the officers deployed a taser against Petitioner multiple times and slammed his head against the ground.

27. Petitioner was transported to a hospital, where the taser probes were removed from his body. According to Petitioner, hospital staff sought to conduct a scan of Petitioner's head, but the officers did not permit the hospital to do so.

28. Following his discharge from the hospital, Petitioner was transported to what he believes was a police station. There, Petitioner's fingerprints were taken. Upon information and belief, it was only through this processing that the officers purported to learn Petitioner's identity and the

existence of an alleged prior order of removal. Petitioner was served with immigration paperwork at that location.

29. Upon information and belief, at no point did any officer obtain a warrant authorizing Petitioner's arrest, and at no point did any officer make an individualized determination that Petitioner was likely to escape before a warrant could be obtained.

30. Petitioner was thereafter transferred to the Metropolitan Detention Center, where he remains in Respondents' custody.

## LEGAL FRAMEWORK

### I. The Fourth Amendment and the Statutory and Regulatory Limits on Immigration Stops and Warrantless Arrests

31. Except at the border and its functional equivalents, the Fourth Amendment prohibits officers from conducting a detentive stop to question a person without reasonable suspicion that the person is a noncitizen unlawfully present in the United States, and prohibits officers from making an arrest without probable cause to believe that the person is a noncitizen unlawfully present in the United States. See *United States v. Brignoni-Ponce*, 422 U.S. 873, 880–82 (1975).

32. Reasonable suspicion must be "particularized and objective." *United States v. Arvizu*, 534 U.S. 266, 273 (2002).

33. By regulation, before detaining an individual for questioning, an immigration officer must have "a reasonable suspicion, based on specific articulable facts, that the person being questioned is, or is attempting to be, engaged in an offense against the United States or is an alien illegally in the United States." 8 C.F.R. § 287.8(b)(2).

34. A warrantless arrest requires considerably more than a brief stop for questioning. An immigration officer may arrest a noncitizen without a warrant only if the officer has reason to

believe both that the noncitizen is in the United States in violation of the immigration laws and that the noncitizen "is likely to escape before a warrant can be obtained for his arrest." 8 U.S.C. § 1357(a)(2); accord 8 C.F.R. § 287.8(c)(2)(i)–(ii); see *Arizona v. United States*, 567 U.S. 387, 407–08 (2012). A "reason to believe" is equivalent to "the constitutional requirement of probable cause." See *Tejeda-Mata v. INS*, 626 F.2d 721, 725 (9th Cir. 1980). The regulation thus imposes two distinct requirements before any warrantless arrest: probable cause that the person is unlawfully present, 8 C.F.R. § 287.8(c)(2)(i), and a separate, individualized determination that the person is likely to escape before a warrant can be obtained, 8 C.F.R. § 287.8(c)(2)(ii).

**II. Reinstatement of a Prior Order of Removal Requires Compliance With 8 C.F.R. § 241.8**

35. Reinstatement of removal is a summary removal procedure under 8 U.S.C. § 1231(a)(5) and 8 C.F.R. § 241.8. Before an officer may reinstate a prior order, the officer must determine: (1) whether the noncitizen has been subject to a prior order of removal, which requires the officer to obtain the prior order; (2) the identity of the noncitizen, that is, whether the noncitizen is in fact the person who was previously removed; and (3) whether the noncitizen unlawfully reentered the United States. 8 C.F.R. § 241.8(a).

36. If the officer determines that the noncitizen is subject to reinstatement, the officer "shall provide the alien with written notice of his or her determination" and "shall advise the alien that he or she may make a written or oral statement contesting the determination." 8 C.F.R. § 241.8(b). If the noncitizen wishes to make such a statement, the officer must allow the noncitizen to do so and must consider whether the statement warrants reconsideration of the determination. *Id.*

37. Under *Accardi*, federal agencies are required to follow their own binding regulations, and the failure to do so renders the resulting agency action unlawful. *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 267–68 (1954); *Morton v. Ruiz*, 415 U.S. 199, 235 (1974). This principle applies with full force in immigration proceedings. *Montilla v. INS*, 926 F.2d 162, 166–67 (2d Cir. 1991).

38. An agency is moreover bound by the rationale it offered for its action at the time it acted, and may not defend that action on a basis devised afterward. See *SEC v. Chenery Corp.*, 318 U.S. 80, 94 (1943). Consistent with that principle, once a noncitizen is detained under one statutory provision, the agency may not convert the statutory authority governing the detention to another provision through the post-hoc issuance of a warrant or other document. See *Matter of Q. Li*, 29 I. & N. Dec. 66, 69 n.4 (BIA 2025). This principle is directly implicated where, as here, the asserted basis for detention emerges only after the arrest. Courts in this Circuit have accordingly rejected the Government's attempts to recharacterize the authority for an unlawful arrest after the fact. See *Inestroza Carbajal v. Frazier*, No. 26-CV-2778, 2026 WL 1309265, at *1–*3 (E.D.N.Y. May 12, 2026); *Pastrana-Beltran v. Mullin*, No. 26-CV-2657, 2026 WL 1398609, at *2 (E.D.N.Y. May 19, 2026).

**III. The Due Process Clause Protects Petitioner From Detention Without Lawful Authority and Adequate Process**

39. The Due Process Clause of the Fifth Amendment protects "all 'persons' within the United States, including [noncitizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). "Freedom from imprisonment, from government custody, detention, or other forms of physical restraint, lies at the heart of the liberty" the Clause protects. *Id.* at 690.

40. An individual is entitled to due process before the government arrests and detains him. Where the government detains a person in the face of a complete failure of process, the "typical remedy" for such "unlawful executive detention" is "of course, release." *Munaf v. Geren*, 553 U.S. 674, 693 (2008); see also *Preiser v. Rodriguez*, 411 U.S. 475, 484 (1973) (identifying release from unlawful custody as the traditional function of the writ of habeas corpus); *Ye v. Maldonado*, No. 25-CV-6417, 2025 WL 3521298 (E.D.N.Y. Dec. 8, 2025); *O.F.B. v. Maldonado*, No. 25-CV-6336, 2025 WL 3277677 (E.D.N.Y. Nov. 25, 2025).

41. Detaining a noncitizen without any notice or opportunity to be heard violates procedural due process even where a statute would otherwise supply detention authority, and the remedy for such a violation is release. See *Diallo v. Noem*, No. 25-CV-9909 (S.D.N.Y. Dec. 23, 2025); *Yao v. Almodovar*, 813 F. Supp. 3d 461, 476 (S.D.N.Y. 2025) (a bond hearing "could not retrospectively cure the due process violation, which derived from her unlawful arrest and detention"); *Chipantiza-Sisalema v. Francis*, No. 25-CV-5528, 2025 WL 1927931, at *3–*4 (S.D.N.Y. July 13, 2025); *Cardenas v. Almodovar*, No. 25-CV-9169, 2025 WL 3215573, at *3–*4 (S.D.N.Y. Nov. 18, 2025).

**IV. The Statutory Framework Governing Petitioner's Detention**

42. The INA provides for three principal forms of civil detention. Section 1226(a) governs the detention of noncitizens arrested within the interior of the United States pending a decision on whether they are to be removed, and permits release on bond. 8 U.S.C. § 1226(a). Section 1225(b) governs the detention of applicants for admission with a close nexus to the border. 8 U.S.C. § 1225(b). And Section 1231 governs the detention of noncitizens subject to an

administratively final order of removal, including a reinstated order. 8 U.S.C. § 1231(a); *Johnson v. Guzman Chavez*, 594 U.S. 523, 542–44 (2021).

43. The Second Circuit has recently held that a noncitizen who is present in the United States after entering without inspection, and who was not apprehended at or near the border, is detained under Section 1226(a) and not Section 1225(b)(2)(A). *Barbosa da Cunha v. Freden*, 175 F.4th 61, 73 (2d Cir. 2026) ("Section 1226(a) plainly applies to noncitizens . . . who are present in the United States, but charged as inadmissible for entering the country without inspection and admission."). Section 1226(a) requires the Government to make an individualized custody determination, before or contemporaneous with the arrest, as to whether detention is warranted based on flight risk and danger to the community. 8 C.F.R. § 236.1(c)(8); see *Gopie v. Lyons*, No. 25-CV-05229 (SJB), 2025 WL 3167130, at *2 (E.D.N.Y. Nov. 13, 2025) ("[B]efore or contemporaneous with detaining a noncitizen, there must be a custody determination.").

## CLAIMS FOR RELIEF

### FIRST CLAIM
**Violation of the Fourth Amendment to the United States Constitution**
***(Unlawful Warrantless Arrest)***

44. Petitioner repeats and re-alleges the allegations contained in all preceding paragraphs of this Petition as if fully set forth herein.

45. The Fourth Amendment permitted Respondents to briefly detain Petitioner for questioning only on reasonable suspicion that he was a noncitizen unlawfully present in the United States, and permitted them to arrest him without a warrant only on probable cause that he was unlawfully present and a determination that he was likely to escape before a warrant could be obtained. *Brignoni-Ponce*, 422 U.S. at 880–82; 8 U.S.C. § 1357(a)(2); 8 C.F.R. § 287.8(c)(2).

46. When Respondents forcibly removed Petitioner from his vehicle, deployed a taser against him multiple times, took him into custody, and transported him, they effected a full custodial arrest, not a brief investigative stop. That arrest was warrantless. Upon information and belief, Respondents lacked probable cause to believe that Petitioner was unlawfully present in the United States, did not know Petitioner's identity at the time of the arrest, and made no individualized determination that Petitioner was likely to escape before a warrant could be obtained. The arrest therefore violated the Fourth Amendment and 8 U.S.C. § 1357(a)(2).

47. To the extent the encounter is characterized as a brief investigative stop rather than an immediate arrest, it too was unlawful, because Respondents possessed no specific, articulable facts giving rise to a reasonable suspicion that Petitioner was engaged in any offense or was a noncitizen unlawfully present in the United States.

48. Petitioner's detention is the direct product of this unlawful arrest, and Petitioner is entitled to release. See *Diallo v. Noem*, No. 25-CV-9909 (S.D.N.Y. Dec. 23, 2025); *G.V. v. Genalo*, No. 26-CV-2893 (E.D.N.Y. May 28, 2026); *Yao v. Almodovar*, 813 F. Supp. 3d 461, 476 (S.D.N.Y. 2025).

**SECOND CLAIM**
**Violation of the Administrative Procedure Act, 5 U.S.C. § 706(2)**
**Violation of 8 U.S.C. § 1357(a)(2) and 8 C.F.R. § 287.8(b)(2), (c)(2)**

49. Petitioner repeats and re-alleges the allegations contained in all preceding paragraphs of this Petition as if fully set forth herein.

50. Under the APA, a court shall "hold unlawful and set aside agency action" that is "not in accordance with law," "contrary to constitutional right," "in excess of statutory jurisdiction,

authority, or limitations," or "without observance of procedure required by law." 5 U.S.C. § 706(2)(A)–(D).

51. Respondents' detentive stop of Petitioner, without any reasonable suspicion based on specific articulable facts, violated 8 C.F.R. § 287.8(b)(2). Respondents' warrantless arrest of Petitioner, without probable cause of an immigration violation and without an individualized determination that Petitioner was likely to escape before a warrant could be obtained, violated 8 U.S.C. § 1357(a)(2) and 8 C.F.R. § 287.8(c)(2)(i)–(ii).

**THIRD CLAIM**
**Violation of the *Accardi* Doctrine and the Administrative Procedure Act**
**Failure to Comply With 8 C.F.R. § 241.8**

52. Petitioner repeats and re-alleges the allegations contained in all preceding paragraphs of this Petition as if fully set forth herein.

53. Under the *Accardi* doctrine, Respondents are bound to follow their own binding regulations, and their failure to do so renders the resulting agency action unlawful. *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 267–68 (1954); *Morton v. Ruiz*, 415 U.S. 199, 235 (1974); *Montilla v. INS*, 926 F.2d 162, 166–67 (2d Cir. 1991).

54. To the extent Respondents purport to detain Petitioner on the basis of a reinstated order of removal, 8 C.F.R. § 241.8 required Respondents to confirm the existence of a prior order, verify Petitioner's identity, and determine that Petitioner unlawfully reentered the United States, and then to serve written notice of the determination and afford Petitioner the opportunity to make a written or oral statement contesting it. 8 C.F.R. § 241.8(a)–(b).

55. Upon information and belief, Respondents failed to comply with one or more of these mandatory requirements before purporting to reinstate any prior order and to detain Petitioner on

that basis. Respondents' failure to follow their own binding regulations renders the resulting agency action, and Petitioner's consequent detention, unlawful and in violation of the APA, 5 U.S.C. § 706(2).

56. Respondents may not cure the unlawful arrest of Petitioner by invoking a reinstated order of removal after the fact. Respondents are bound by the basis on which they acted at the time of the arrest, see *SEC v. Chenery Corp.*, 318 U.S. 80, 94 (1943); *Matter of Q. Li*, 29 I. & N. Dec. 66, 69 n.4 (BIA 2025), and a post-hoc justification for the seizure and detention is impermissible, see *Inestroza Carbajal v. Frazier*, No. 26-CV-2778, 2026 WL 1309265, at *1–*3 (E.D.N.Y. May 12, 2026); *Pastrana-Beltran v. Mullin*, No. 26-CV-2657, 2026 WL 1398609, at *2 (E.D.N.Y. May 19, 2026).

**FOURTH CLAIM**
**Violation of the Due Process Clause of the Fifth Amendment to the United States Constitution**
**(*Procedural Due Process*)**

57. Petitioner repeats and re-alleges the allegations contained in all preceding paragraphs of this Petition as if fully set forth herein.

58. The Due Process Clause of the Fifth Amendment protects all "person[s]" from deprivation of liberty "without due process of law," and entitles Petitioner to a meaningful process assessing whether his detention is justified.

59. Petitioner was seized, arrested, and detained without lawful authority, without notice of any lawful basis for his arrest, and without any opportunity to contest his seizure and detention before a neutral decision-maker. This complete absence of process, both before and contemporaneous with the deprivation of Petitioner's liberty, violates the Due Process Clause of the Fifth Amendment.

60. The government's ongoing detention of Petitioner, in the face of this failure of process, entitles him to immediate release. *Munaf v. Geren*, 553 U.S. 674, 693 (2008); see also *Preiser v. Rodriguez*, 411 U.S. 475, 484 (1973). This is so even if a statute would otherwise supply authority for Petitioner's detention, because detention without notice or an opportunity to be heard independently violates procedural due process, and a subsequent custody determination cannot retroactively cure a deprivation of liberty that derived from an unlawful arrest. See *Diallo v. Noem*, No. 25-CV-9909 (S.D.N.Y. Dec. 23, 2025); *Yao v. Almodovar*, 813 F. Supp. 3d 461, 476 (S.D.N.Y. 2025); *Chipantiza-Sisalema v. Francis*, No. 25-CV-5528, 2025 WL 1927931, at *3–*4 (S.D.N.Y. July 13, 2025).

## PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court grant the following relief:

(1) Assume jurisdiction over this matter;

(2) Issue an Order to Show Cause directing Respondents to show cause, within three days, why this Petition should not be granted;

(3) Issue an Order enjoining Respondents from transferring Petitioner outside the jurisdiction of this Court during the pendency of this action, absent further order of the Court;

(4) Declare that Petitioner's stop, warrantless arrest, and continued detention violate the Fourth and Fifth Amendments to the United States Constitution, the Administrative Procedure Act, 5 U.S.C. § 706(2), the *Accardi* doctrine, and binding agency regulations;

(5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner from custody immediately; or, in the alternative, order Respondents to provide Petitioner a prompt, constitutionally adequate, and individualized custody determination before a neutral decision

maker with authority to order release, at which the government bears the burden of justifying continued detention;

(6) Grant any further relief this Court deems just and proper.

Respectfully submitted,

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PALACIOS LAW GROUP
15 Roslyn Road
Mineola, NY 11501
Attorney for Petitioner

Dated: June 3, 2026

**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

I represent Petitioner, Rafael Quintanilla Hernandez, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.