UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Hugo Adonis Reyes Benitez,

Petitioner,

v.

Markwayne MULLIN, Secretary, U.S. Department of Homeland Security; Todd BLANCHE, U.S. Attorney General; David VENTURELLA, Acting Director, Immigration and Customs Enforcement; Kenneth GENALO, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement

Respondents.

Case No.

PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241

1. Petitioner, **Hugo Adonis Reyes-Benitez**, Alien Number **A#** [redacted], is a native and citizen of El Salvador who has continuously resided in the United States since approximately 2015.

2. Petitioner entered the United States as a minor with his mother and has remained continuously present in this country since that time.

3. Petitioner currently resides in Brentwood, New York, with his mother and maintains extensive family ties within the United States.

4. Petitioner is the beneficiary of an approved Special Immigrant Juvenile Status ("SIJS") petition and possesses a pending Form I-485, Application to Register Permanent Residence or Adjust Status, Receipt Number MSC2590241580.

5. Petitioner's adjustment application is based upon his approved SIJS classification and remains pending before United States Citizenship and Immigration Services ("USCIS").

6. On November 21, 2023, the Immigration Court terminated Petitioner's removal proceedings and ordered DISMISSAL of the case.

7. According to the Executive Office for Immigration Review ("EOIR") Automated Case Information System, there are currently no future immigration court hearings scheduled for Petitioner.

8. Petitioner has no criminal history, no arrests, and no convictions of any kind.

9. Petitioner has consistently complied with all immigration requirements and has appeared for appointments and proceedings as directed by immigration authorities.

10. Petitioner suffers from documented developmental, speech, and learning disabilities that have affected him since childhood.

11. While living in El Salvador, Petitioner experienced significant educational limitations and was unable to access specialized educational services necessary to address his disabilities.

12. Following his arrival in the United States, educational professionals identified developmental and speech-related delays requiring specialized educational intervention and support services.

13. Despite these challenges, Petitioner successfully completed high school in New York.

14. Petitioner subsequently enrolled in educational and developmental support programs through Eastern Suffolk BOCES, where he has continued receiving services designed to assist his development and independence.

15. Petitioner has participated in therapeutic programs and home-based monitoring services intended to address his cognitive and developmental limitations.

16. Due to his disabilities, Petitioner experiences substantial difficulty understanding complex matters, communicating effectively, and independently managing important personal affairs.

17. Petitioner is unable to reliably memorize telephone numbers and depends heavily upon the assistance of family members for daily functioning and decision-making.

18. Petitioner is an active member of his Christian church community and is known among family members, church members, and neighbors as a peaceful, hardworking, and law-abiding individual.

19. Petitioner is employed through delivery service platforms, including DoorDash and Instacart, while continuing to work toward greater independence despite his disabilities.

20. On June 19, 2026, Petitioner appeared as directed by USCIS for a scheduled biometrics appointment related to his pending Form I-485 application.

21. The appointment took place at the USCIS Application Support Center located at 330 Wheeler Road, Hauppauge, New York 11788.

22. Petitioner attended the appointment voluntarily and in compliance with instructions issued by USCIS.

23. Petitioner was accompanied by his aunt, Dilcia del Carmen Benitez de Gonzalez, a lawful permanent resident of the United States.

24. While Petitioner was present at the Application Support Center, an immigration officer approached him and asked him to identify himself.

25. After Petitioner provided his name, officers separated him from his aunt and escorted him away.

26. A short time later, immigration officials informed Petitioner that he was being taken into custody.

27. Petitioner was not participating in any unlawful activity at the time of his detention.

28. Petitioner was not encountered during a criminal investigation, fugitive operation, workplace raid, or public safety enforcement action.

29. Rather, Petitioner was detained while voluntarily appearing for a government-scheduled biometrics appointment connected to his pending adjustment-of-status application.

30. Upon information and belief, no judicial warrant was presented to Petitioner prior to his detention.

31. Petitioner's detention occurred despite his approved SIJS classification, his pending adjustment application, the dismissal of his removal proceedings, and his full compliance with immigration requirements.

32. Following his detention, Petitioner was transferred into ICE custody.

33. ICE's Online Detainee Locator System currently identifies Petitioner but does not disclose a detention facility, instead stating only "Call ICE For Details."

34. Family members have been unable to determine Petitioner's precise location or custodial status.

35. Since his detention on June 19, 2026, Petitioner's family has experienced significant emotional distress and fear due to the inability to communicate with him.

36. Petitioner's developmental disabilities make him particularly vulnerable in detention and substantially impair his ability to advocate for himself, understand legal proceedings, or communicate effectively with family members and legal representatives.

37. Petitioner does not pose a danger to the community.

38. Petitioner presents no meaningful risk of flight.

39. Petitioner has substantial family, community, religious, and educational ties to New York.

40. Petitioner remains in civil immigration detention despite the absence of any criminal history, despite his pending application for lawful permanent residence, and despite the prior dismissal of his removal proceedings.

41. Petitioner currently has no meaningful administrative mechanism through which he may obtain immediate review of the legality of his detention.

42. Accordingly, Petitioner seeks relief through this Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and requests immediate release from custody or such other relief as this Court deems just and proper.

JURISDICTION

43. This action arises under the Constitution and laws of the United States, including the Fifth Amendment to the United States Constitution, the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101 et seq., and the federal habeas corpus statute.

44. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241 because Petitioner is in federal immigration custody and challenges the legality and constitutionality of that detention.

45. This Court also has jurisdiction pursuant to 28 U.S.C. § 1331 because this action arises under the Constitution and laws of the United States.

46. Jurisdiction is further supported by Article I, Section 9, Clause 2 of the United States Constitution, commonly known as the Suspension Clause.

47. This Court possesses authority to issue declaratory and injunctive relief pursuant to 28 U.S.C. §§ 2201 and 2202.

48. This Court further possesses authority under the All Writs Act, 28 U.S.C. § 1651, to issue all orders necessary or appropriate in aid of its jurisdiction.

49. Petitioner is currently detained by the Department of Homeland Security and U.S. Immigration and Customs Enforcement under color of federal authority.

50. Petitioner was detained on June 19, 2026 while appearing for a scheduled USCIS biometrics appointment related to his pending Form I-485 Application to Register Permanent Residence or Adjust Status.

51. At the time of his detention, Petitioner was the beneficiary of an approved Special Immigrant Juvenile Status petition and had a properly filed adjustment application pending before USCIS.

52. Prior to his detention, Petitioner's removal proceedings had been dismissed by an Immigration Judge on November 21, 2023.

53. According to EOIR records, no future removal proceedings were pending against Petitioner at the time of his detention.

54. Petitioner challenges the legal authority under which Respondents are currently detaining him and seeks immediate judicial review of that custody.

55. Petitioner further alleges that his continued detention violates the Due Process Clause of the Fifth Amendment because he has been deprived of liberty without adequate legal process.

56. Petitioner has no criminal history, no record of violence, and no history of failing to appear for immigration proceedings or appointments.

57. Petitioner has complied with all requirements imposed by immigration authorities, including appearing for the USCIS appointment at which he was detained.

58. Because Petitioner remains in custody in violation of the Constitution and laws of the United States, habeas corpus relief under 28 U.S.C. § 2241 is necessary and appropriate.

59. Accordingly, this Petition for Writ of Habeas Corpus is properly before this Court.

VENUE

60. Venue is proper in the Eastern District of New York pursuant to 28 U.S.C. § 1391(e) because Respondents are officers and agencies of the United States acting in their official capacities.

61. Venue is further proper because a substantial part of the events and omissions giving rise to this action occurred within the Eastern District of New York.

62. Petitioner resides at [redacted], within the Eastern District of New York.

63. On June 19, 2026, Petitioner appeared for a scheduled USCIS biometrics appointment at the USCIS Application Support Center located at 330 Wheeler Road, Hauppauge, New York 11788.

64. Hauppauge, New York is located within the Eastern District of New York.

65. Petitioner was detained by immigration authorities while attending that USCIS appointment within the Eastern District of New York.

66. The events directly giving rise to this Petition therefore occurred within this District.

67. Following Petitioner's detention, ICE assumed custody of Petitioner through officers operating within the New York Field Office's area of responsibility.

68. Upon information and belief, the decisions concerning Petitioner's detention were made, approved, or implemented by officials acting within the Eastern District of New York and the New York Field Office of Immigration and Customs Enforcement.

69. Because a substantial portion of the events giving rise to this action occurred within this District, venue is proper under 28 U.S.C. § 1391(e).

70. To the extent Petitioner's immediate custodian is later determined to be located outside the Eastern District of New York, venue nevertheless remains proper because the challenged detention originated within this District and the responsible federal officials are subject to service of process here.

71. Accordingly, venue in the Eastern District of New York is proper.

REQUIREMENTS OF 28 U.S.C. § 2243

72. Pursuant to 28 U.S.C. § 2243, upon the filing of a petition for a writ of habeas corpus, this Court shall forthwith award the writ or issue an order directing Respondents to show cause why the writ should not be granted unless it plainly appears from the face of the petition that Petitioner is not entitled to relief.

73. The statute reflects Congress's determination that challenges to unlawful executive detention require prompt judicial review.

74. Petitioner remains in federal immigration custody without meaningful judicial review of the legality of his detention.

75. Petitioner was detained on June 19, 2026 while complying with a USCIS biometrics appointment connected to his pending application for lawful permanent residence.

76. At the time of his detention, Petitioner possessed approved Special Immigrant Juvenile Status, had a pending Form I-485 application, and had previously obtained dismissal of his removal proceedings before the Immigration Court.

77. Petitioner currently has no meaningful administrative mechanism through which he can promptly challenge the legality of his detention.

78. Petitioner's developmental and cognitive disabilities further impair his ability to protect his legal interests while detained.

79. Habeas corpus therefore provides the only effective vehicle for judicial review of Petitioner's continued detention.

80. Prompt consideration is necessary to prevent ongoing violations of Petitioner's constitutional rights and to protect his liberty interests.

PARTIES

81. Petitioner Hugo Adonis Reyes-Benitez is a native and citizen of El Salvador and is identified by Alien Registration Number A# [redacted].

82. Petitioner resides with his mother at [redacted].

83. Petitioner is currently detained in ICE custody at a location that has not been disclosed to his family despite repeated efforts to obtain information.

84. Respondent Markwayne Mullin is sued in his official capacity as Secretary of the Department of Homeland Security and is responsible for the administration and enforcement of the immigration laws of the United States.

85. Respondent Todd Blanche is sued in his official capacity as Attorney General of the United States and exercises supervisory authority over immigration litigation and federal detention matters.

86. Respondent David Venturella is sued in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement.

87. Respondent Kenneth Genalo is sued in his official capacity as Acting Field Office Director for the New York Field Office of Immigration and Customs Enforcement.

88. Upon identification of Petitioner's place of confinement, the warden, facility administrator, or immediate custodian shall be deemed a proper respondent to this action.

STATEMENT OF FACTS

89. Petitioner entered the United States in approximately 2015 as a minor accompanied by his mother.

90. Since that time, Petitioner has continuously resided in the United States.

91. Petitioner subsequently obtained Special Immigrant Juvenile Status based upon findings made by a state court concerning abuse, neglect, abandonment, or a similar basis under applicable law.

92. Petitioner's Form I-360 was approved, rendering him eligible to apply for adjustment of status.

93. Petitioner thereafter filed Form I-485, Application to Register Permanent Residence or Adjust Status, Receipt Number MSC2590241580.

94. Petitioner's adjustment application remains pending.

95. On November 21, 2023, an Immigration Judge ordered dismissal of Petitioner's removal proceedings.

96. EOIR records reflect that no future hearings are scheduled in Petitioner's case.

97. Petitioner has never been convicted of any crime and has no criminal record.

98. Petitioner has consistently complied with all immigration requirements imposed upon him.

99. Petitioner suffers from developmental, learning, and speech disabilities that have existed since childhood.

100. While living in El Salvador, Petitioner lacked access to specialized educational services.

101. Following his arrival in the United States, educational professionals identified significant developmental and learning challenges.

102. Despite these limitations, Petitioner completed high school.

103. Petitioner subsequently participated in educational and developmental programs through Eastern Suffolk BOCES.

104. Petitioner continues to require support services and family assistance because of his disabilities.

105. Petitioner is unable to reliably memorize telephone numbers and depends heavily upon close family members.

106. Petitioner is an active member of his church community.

107. Petitioner works through delivery service platforms including DoorDash and Instacart.

108. On June 19, 2026, Petitioner appeared as instructed for a USCIS biometrics appointment at the USCIS Application Support Center located at 330 Wheeler Road, Hauppauge, New York.

109. Petitioner attended the appointment voluntarily.

110. Petitioner was accompanied by his aunt, Dilcia del Carmen Benitez de Gonzalez, a lawful permanent resident.

111. During the appointment, an immigration officer approached Petitioner and requested his identity.

112. After Petitioner identified himself, officers separated him from his aunt.

113. Shortly thereafter, Petitioner was informed that he was being taken into custody.

114. Petitioner was detained despite possessing approved SIJS classification, a pending adjustment application, and a dismissed removal case.

115. Since the detention, family members have been unable to communicate with Petitioner.

116. Petitioner's family has experienced severe emotional distress and concern for his wellbeing.

117. Petitioner's developmental disabilities significantly increase his vulnerability while detained and impair his ability to understand and navigate legal proceedings.

LEGAL FRAMEWORK

118. The Fifth Amendment prohibits the federal government from depriving any person of liberty without due process of law.

119. Noncitizens physically present within the United States are protected by the Due Process Clause.

120. Civil immigration detention must bear a reasonable relationship to a legitimate governmental purpose.

121. Detention that is arbitrary, excessive, or lacking adequate procedural safeguards violates the Fifth Amendment.

122. Habeas corpus review under 28 U.S.C. § 2241 remains available to challenge unlawful executive detention.

123. Federal courts possess authority to order release where detention violates constitutional guarantees.

124. Courts additionally possess inherent equitable authority to admit habeas petitioners to bail in extraordinary circumstances where substantial constitutional claims are presented.

CLAIMS FOR RELIEF

COUNT ONE

Violation of the Due Process Clause of the Fifth Amendment — Substantive Due Process

125. Petitioner incorporates by reference all preceding paragraphs as if fully set forth herein.

126. The Fifth Amendment to the United States Constitution provides that no person shall be deprived of liberty without due process of law. U.S. Const. amend. V.

127. The protections of the Fifth Amendment apply to all persons physically present within the United States, including noncitizens.

128. The Due Process Clause prohibits arbitrary governmental action and forbids civil detention that lacks a sufficient governmental justification.

129. Petitioner Hugo Adonis Reyes-Benitez is currently detained by U.S. Immigration and Customs Enforcement despite possessing approved Special Immigrant Juvenile Status and a pending Form I-485 Application to Register Permanent Residence or Adjust Status.

130. Prior to his detention, Petitioner's removal proceedings had been dismissed by an Immigration Judge on November 21, 2023.

131. According to records maintained by the Executive Office for Immigration Review, no future immigration court hearings were pending at the time of Petitioner's detention.

132. Petitioner has no criminal history, no arrests, no convictions, and no record of conduct suggesting that he poses a danger to the community.

133. Petitioner has continuously resided in the United States since approximately 2015 and maintains substantial family, educational, religious, and community ties in New York.

134. Petitioner has consistently complied with all immigration requirements imposed upon him by federal authorities.

135. On June 19, 2026, Petitioner voluntarily appeared at a USCIS biometrics appointment at the Application Support Center located in Hauppauge, New York, in connection with his pending adjustment-of-status application.

136. Petitioner attended that appointment because he was directed to do so by the federal government as part of the lawful adjudication process for his application for permanent residence.

137. Rather than being encountered during a criminal investigation, fugitive operation, or public-safety enforcement action, Petitioner was detained while complying with a government-mandated immigration appointment.

138. Respondents have not made any individualized determination that Petitioner presents a danger to the community.

139. Respondents have not made any individualized determination that Petitioner presents a meaningful risk of flight.

140. Petitioner's detention bears no reasonable relationship to any legitimate governmental objective.

141. Petitioner's detention is especially arbitrary given that he was actively pursuing lawful permanent resident status through a process specifically authorized by Congress and administered by USCIS.

142. Petitioner's detention is further unreasonable because he suffers from documented developmental, learning, and speech disabilities that substantially limit his ability to navigate complex legal proceedings and independently protect his interests.

143. Petitioner's continued confinement has separated him from the family members upon whom he depends for support and assistance.

144. Since his detention, family members have been unable to communicate with him and have been unable to determine his precise location.

145. Under the totality of these circumstances, Petitioner's detention constitutes arbitrary executive action and an impermissible deprivation of liberty.

146. Respondents' actions shock the conscience and exceed the constitutional limits imposed by the Due Process Clause of the Fifth Amendment.

147. Unless restrained by this Court, Respondents will continue to deprive Petitioner of his liberty without adequate constitutional justification.

148. Petitioner has suffered and will continue to suffer immediate and irreparable injury as a result of his unlawful detention.

149. Accordingly, Petitioner respectfully requests that this Court issue a writ of habeas corpus, order his immediate release from ICE custody, and grant such further relief as the Court deems just and proper.

COUNT TWO

Violation of the Due Process Clause of the Fifth Amendment — Procedural Due Process

150. Petitioner incorporates by reference all preceding paragraphs as if fully set forth herein.

151. The Fifth Amendment guarantees procedural due process and prohibits the federal government from depriving any person of liberty without constitutionally adequate procedures and a meaningful opportunity to be heard.

152. Petitioner is currently detained in ICE civil immigration custody despite possessing approved Special Immigrant Juvenile Status, a pending Form I-485 Application to Register Permanent Residence or Adjust Status, and a prior Immigration Court order dismissing his removal proceedings.

153. On June 19, 2026, Petitioner appeared voluntarily at a USCIS biometrics appointment at the Application Support Center located in Hauppauge, New York, in compliance with instructions issued by the federal government concerning his pending adjustment application.

154. Rather than being encountered during a criminal investigation or immigration enforcement operation, Petitioner was detained while complying with a government-directed immigration process.

155. Petitioner has no criminal history, no record of violence, and no history of failing to appear for immigration proceedings or appointments.

156. Petitioner has not been afforded a meaningful opportunity to challenge the legal basis for his detention before a neutral decision-maker with authority to grant effective relief.

157. Upon information and belief, no adequate administrative mechanism currently exists through which Petitioner may obtain prompt review of the legality of his detention.

158. Petitioner suffers from documented developmental, learning, and speech disabilities that substantially impair his ability to understand complex legal proceedings and protect his own interests while detained.

159. Since his detention, family members have been unable to communicate with him and have been unable to ascertain his precise location.

160. The absence of constitutionally adequate procedures to challenge Petitioner's detention violates the Due Process Clause of the Fifth Amendment.

161. Unless enjoined by this Court, Petitioner will continue to suffer irreparable injury.

162. Accordingly, Petitioner respectfully requests that this Court:

a. Order his immediate release from ICE custody; or

b. In the alternative, order Respondents to provide a prompt custody hearing before a neutral decision-maker with authority to order his release.

COUNT THREE

Violation of the First and Fifth Amendments

163. Petitioner incorporates by reference all preceding paragraphs as if fully set forth herein.

164. The First Amendment protects the right to petition the government for redress of grievances and to seek benefits and relief through lawful governmental processes.

165. Petitioner was actively pursuing lawful permanent resident status through a pending Form I-485 application based upon approved Special Immigrant Juvenile Status.

166. Petitioner appeared at a USCIS biometrics appointment because federal law and agency regulations required his attendance as part of the adjudication of that application.

167. Respondents detained Petitioner while he was participating in that government-directed process.

168. Such actions burden and chill participation in lawful immigration procedures by individuals seeking immigration benefits through established legal channels.

169. Petitioner's detention further interferes with his ability to communicate with counsel, family members, and others assisting him in the pursuit of his immigration case.

170. The foregoing actions violate rights protected by the First Amendment and the liberty interests protected by the Fifth Amendment.

171. Unless enjoined by this Court, Petitioner will continue to suffer irreparable harm.

COUNT FOUR

Release on Bail Pending Adjudication

172. Petitioner incorporates by reference all preceding paragraphs as if fully set forth herein.

173. Federal courts possess inherent authority to release habeas petitioners on bail pending adjudication of their claims in extraordinary circumstances.

174. Petitioner presents substantial constitutional claims raising serious questions concerning the legality of his detention.

175. Extraordinary circumstances exist because:

a. Petitioner possesses approved Special Immigrant Juvenile Status;

b. Petitioner maintains a pending Form I-485 application for lawful permanent residence;

c. Petitioner's removal proceedings were dismissed by an Immigration Judge on November 21, 2023;

d. Petitioner has no criminal history;

e. Petitioner was detained while voluntarily attending a USCIS biometrics appointment;

f. Petitioner suffers from developmental and cognitive disabilities that increase his vulnerability while detained;

g. Petitioner's family has been unable to communicate with him since his detention;

h. Petitioner poses no danger to the community and presents no meaningful risk of flight.

176. Continued detention during the pendency of this action will cause irreparable harm and undermine the effectiveness of habeas relief.

177. Accordingly, Petitioner respectfully requests release on bail pending final adjudication of this Petition.

COUNT FIVE

Violation of the Immigration and Nationality Act and the Fifth Amendment — Detention Without Statutory Authority (Ultra Vires Detention)

178. Petitioner incorporates by reference all preceding paragraphs as if fully set forth herein.

179. Federal immigration detention is strictly authorized and limited by statute, including but not limited to 8 U.S.C. §§ 1226 and 1231. Any deprivation of liberty by immigration authorities must be grounded in valid statutory authority and consistent with the Constitution.

180. Government actors may not detain an individual in the absence of lawful authority conferred by Congress, and any detention exceeding statutory limits constitutes ultra vires action in violation of the Immigration and Nationality Act and the Due Process Clause of the Fifth Amendment.

181. Petitioner Hugo Adonis Reyes-Benitez is currently detained by U.S. Immigration and Customs Enforcement despite the absence of any active removal proceedings before the Immigration Court, which were dismissed on November 21, 2023.

182. According to records maintained by the Executive Office for Immigration Review, there are no pending or future immigration court proceedings in Petitioner's case.

183. Petitioner possesses approved Special Immigrant Juvenile Status and a pending Form I-485 Application to Register Permanent Residence or Adjust Status.

184. Petitioner was taken into custody on June 19, 2026 while appearing at a scheduled USCIS biometrics appointment in Hauppauge, New York.

185. Upon information and belief, Petitioner was not served with a new Notice to Appear, reinstatement order, or any other charging document establishing a new basis for immigration detention at the time of his arrest.

186. Petitioner has not been provided with any explanation identifying the statutory basis for his continued civil immigration detention.

187. The continued detention of Petitioner without a clear statutory foundation is arbitrary, unauthorized by law, and exceeds the scope of authority granted to Respondents under the Immigration and Nationality Act.

188. To the extent Respondents purport to detain Petitioner under any provision of 8 U.S.C. § 1226 or § 1231, such detention is unlawful because the statutory predicates for continued detention are not satisfied based on the dismissal of proceedings and the absence of a currently operative removal order.

189. Petitioner's continued confinement therefore constitutes detention without lawful statutory authority and violates the Fifth Amendment's guarantee of due process of law.

190. Unless enjoined by this Court, Petitioner will continue to suffer irreparable harm as a result of unlawful executive detention.

191. Accordingly, Petitioner respectfully requests that this Court issue a writ of habeas corpus, order Petitioner's immediate release from custody, and grant such further relief as the Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Petitioner Hugo Adonis Reyes-Benitez respectfully requests that this Court:

192. Issue a Writ of Habeas Corpus directing Respondents to show cause why Petitioner is being detained and ordering his immediate release from U.S. Immigration and Customs Enforcement custody;

193. In the alternative, order Respondents to provide Petitioner with a prompt and constitutionally adequate custody hearing before a neutral decision-maker with authority to order his release;

194. Enjoin Respondents from transferring Petitioner outside the jurisdiction of this Court during the pendency of this action, and require that Petitioner remain physically present within the Eastern District of New York or Eastern District of New York (as applicable) to preserve this Court's jurisdiction;

195. Order Respondents to immediately disclose Petitioner's current location, custodial status, and all records reflecting the legal basis for his detention;

196. Grant expedited consideration of this Petition pursuant to 28 U.S.C. § 2243 in light of the ongoing deprivation of liberty;

197. Grant such other and further relief as this Court deems just and proper.

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

- I, **John J. Garzon, Esq.,** attorney for Petitioner **Hugo Adonis Reyes-Benitez**, hereby verify under penalty of perjury pursuant to **28 U.S.C. § 1746** that the factual statements contained in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge, information, and belief.

Dated: June 19, 2026

/s/ John J. Garzon

JOHN J. GARZON, ESQ
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CERTIFICATE OF ELECTRONIC FILING

I hereby certify that on June 19, 2026, I electronically filed the foregoing **Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: June 19, 2026

New York, New York

/s/ John J. Garzon

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