U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

June 28, 2026

Honorable Nusrat J. Choudhury
United States District Court Judge
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Martinez Adauto v. Maldonado, et al.*, No. 26-cv-3784 (NJC)

Dear Judge Choudhury:

This Office represents Respondents in the above-referenced action, in which Petitioner Fernando Jefferson Martinez Adauto ("Petitioner") filed a Petition for a writ of habeas corpus on June 25, 2026, challenging his detention by Immigration and Customs Enforcement ("ICE"). *See* ECF Dkt. # 1. Respondents respectfully submit this letter in response to the Court's Order dated June 27, 2026 directing that Respondents "provide all factual submissions and legal arguments in response to the Petition by" today.

Respondents respectfully advise the Court that, in addition to factual submissions submitted on Friday, June 26, 2026 at ECF Nos. 8 through 8-8, the legal arguments set forth in Respondents' letter dated June 26, 2026 (ECF No. 8, the "June 26 Letter") and the legal arguments set forth in the briefing from *Wright v. Mullin, et al.*, No. 26-cv-2114 (E.D.N.Y. 2026) (incorporated by reference in the June 26 Letter),[1] Respondents also respectfully submit the attached Federal National Crime Information Center inquiry, which contains information about Petitioner's Grand Larceny in the Fourth Degree charge and additional identifying information about Petitioner. *See attached* Exhibit H. Respondents did not previously submit this document because the Petition acknowledged the Grand Larceny charge; however, Respondents submit it now to provide a complete factual record.

[1] On Friday June 26, 2026, the undersigned had a discussion with Petitioner's counsel where the briefing and posture of the *Wright* case was discussed, and the undersigned confirmed that the briefing was publicly accessible. Therefore, because the Court's Order acknowledges that the *Wright* case briefing can be accessed by Petitioner, and the undersigned confirmed the same on Friday with Petitioner's counsel, Respondents refrain from submitting additional legal arguments which would only duplicate the legal arguments made in *Wright*.

Respondents thank the Court for its consideration of this submission.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

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Cc: Counsel of record by ECF