U.S. Department of Justice

United States Attorney
Eastern District of New York

610 Federal Plaza
Central Islip, New York 11722

June 29, 2026

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

Re: *Dagoberto Martinez Torres v. Genalo, et.al.* 26-cv-3890 (Brown, J.)

Dear Judge Brown:

This Office represents Respondents in the above captioned habeas petition filed by Petitioner Dagoberto Martinez Torres ("Petitioner"). Docket Entry ("DE") #1.

This letter is respectfully submitted pursuant to Your Honor's Standing Order dated June 29, 2026. Respondents note that Petitioner has a conviction for identity theft as a misdemeanor in 2006 in the state of Virginia.

However, Respondents are not currently in possession of any information, as required by Your Honor's order, 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, firearms or gang affiliation. *See* Standing Order.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/ Diane C. Leonardo
Diane C. Leonardo
Assistant U.S. Attorney
(631) 715-7854