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December 3, 2025

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Hon. Lisa Godbey Wood, U.S. District Judge
Hon. Benjamin W. Cheesbro, U.S. Magistrate Judge
601 Tebeau Street
Waycross, Georgia 31501

RE: Palles-Franco v. Normand et al., No. 5:25-cv-154

Rebecca Hufstader

Dear Judge Godbey Wood and Judge Cheesbro:

Undersigned counsel for petitioner writes to clarify statements in the above-captioned Petition for Writ of Habeas Corpus (Doc. No. 1) about Petitioner Jonny Palles-Franco's criminal history in the United States, based on new information that counsel was unaware of at the time of filing. Prior to filing the habeas petition, Mr. Palles-Franco told his immigration counsel at Legal Services of New Jersey that he had no criminal record in the United States. In a later call subsequent to filing, Mr. Palles-Franco disclosed an arrest from July 2024 for theft of property valued at less than \$200 in Stone Harbor, New Jersey, after which he ultimately pled guilty to a violation of Article 156 (relating to beach conduct) of the Stone Harbor Borough Ordinances and paid a fine. Only after learning of this incident was counsel able to obtain documentation verifying the details, because Mr. Palles-Franco's name was misspelled in the relevant records.

Mr. Palles-Franco explained that he did not previously share the details of the municipal violation because he believed it was not relevant, given that it resulted only in a beach fine. Neither offense is a "crime" under New Jersey law. *See* N.J. Stat. Ann. § 2C:1-4. This municipal adjudication has no bearing on the claims or relief sought in Mr. Palles-Franco's habeas petition. As discussed in the habeas petition, should the court rule that Mr. Palles-Franco is properly detained under 8 U.S.C. § 1226 rather than 8 U.S.C. § 1225(b)(2), an immigration judge would assess the impact of his criminal history on his eligibility for bond. *Pet. at* ¶ 21 & n.1; *see Matter of Joseph*, 22 I&N Dec. 799, 800 (BIA 1999). However, out of an abundance of caution, counsel alerts the Court to correct the record.

The following exhibits are attached to this letter:

1. **Exhibit D** is a true and correct copy of Petitioner's Disposition issued by the Stone Harbor Municipal Court on August 25, 2025 and the Municipal Court Case Search screenshot related to Petitioner's case before the Stone Harbor Municipal Court.
2. **Exhibit E** is a true and correct copy of article 156 of the ordinances for the Borough of Stone Harbor, New Jersey.

CC: Woelke Leithart, U.S. Attorney's Office, by email

Respectfully Submitted,

/s/Rebecca Hufstader

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