

Petitioner's Advisory Pursuant to Court's Order

Now comes Petitioner, Seamus Culleton through Counsel and respectfully submits the aforementioned advisory, pursuant to the Court's Order dated December 12, 2025.

Per Petitioner's Clarification Affidavit, he avers that he was never served with a Notice of Intent to Issue a Final Administrative Order ("NOIIFAO") at any time while in ICE custody as alleged by Respondents. The first and only document the Petitioner was served with was the Final Administrative Order of removal which he received on November 14, 2025. Prior to that date, Petitioner maintains that he was never served with any notice of intent, or any other charging documents.

Petitioner avers that upon his arrest ICE officers asked him questions regarding his marital and employment status, to which the Petitioner truthfully responded that he was married to his U.S. citizen spouse, Tiffany Smith, and that he possesses a valid work authorization and has a pending marriage-based green card interview. Petitioner maintains that he had never seen the NOIIFAO, never executed same and refused to execute the sole documents he was served; the Final Administrative Removal Order dated September 10, 2025.

Petitioner's Clarification Affidavit is further corroborated by the government's failure to reference these documents at both the bond hearing and motion to reconsider the grant of bond before the immigration court. Both events happened after the NOIIFAO was purportedly served on him by the government.

WHEREFORE Counsel respectfully requests this Honorable Court to order a rescission of his Order of Administrative Removal, allow him in this case and order Petitioner's release from custody to allow him to attend his scheduled marriage-based green card interview on December

18, 2025. That interview will result in the adjustment of his status to that of a lawful permanent residence of the United States.

Respectfully submitted,

/s/ Ogor Winnie Okoye

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CERTIFICATE OF SERVICE

I, Ogor Winnie Okoye, do hereby certify that this document and the documents below filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF):

- Petitioner's advisory; and
- Petitioner's Clarification Affidavit.

Respectfully submitted,
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