UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MIGDALIA JOSEFINA PEREZ QUINTERO,

*Petitioner,*

v.

LaDeon FRANCIS, Field Office Director of Enforcement and Removal Operations, New York Field Office, Immigration and Customs Enforcement; Todd LYONS, Acting Director, Immigration and Customs Enforcement; Kristi NOEM, Secretary, U.S. DEPARTMENT OF HOMELAND SECURITY; Pamela BONDI, U.S. Attorney General; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW,

*Respondents.*

No. 25-CV-10107 (MKV)

DECLARATION OF ASSISTANT FIELD OFFICE DIRECTOR MATTHEW W. REAVES

Pursuant to 28 U.S.C. § 1746, I, Matthew W. Reaves hereby declare under penalty of perjury that the following is true and correct:

1. I am an Assistant Field Office Director ("AFOD") at U.S. Immigration and Customs Enforcement ("ICE") Enforcement and Removal Operations ("ERO") within the U.S. Department of Homeland Security ("DHS"). I have served in this capacity since December 2020. As an AFOD, I manage the cases of aliens who are in immigration proceedings. Once an alien is ordered removed from the United States, I facilitate the alien's removal by coordinating with the government of the alien's country of removal to obtain proper travel documents.

2. I have prepared this declaration in connection with a Petition for a Writ of Habeas Corpus filed by the petitioner, Ms. Perez Quintero. The petitioner has been assigned the following Alien Number: [redacted].

3. The following representations are based on my review of petitioner's administrative file and consultation with my colleagues.

4. The petitioner is a native and citizen of Venezuela.

5. She is currently detained at the Richwood Correctional Center in Richwood, Louisiana, pursuant to the Immigration and Nationality Act ("INA") § 235(b)(2)(A) [8 U.S.C. § 1225(b)(2)(A)].

6. On September 10, 2022, the petitioner, who presented herself as a citizen of Venezuela, unlawfully entered the United States on foot, by crossing the border from Mexico into the United States in the El Paso region of Texas, outside of a port of entry. The petitioner did not possess or present a valid immigrant visa, reentry permit, border crossing identification card, or other valid entry document. Inasmuch as she had sneaked across the border, she was not at that time admitted or paroled, let alone inspected by an immigration officer.

7. At 6:34 a.m. on the same date, September 10, 2022, the petitioner was encountered by U.S. Border Patrol, a component of U.S. Customs and Border Protection (CBP), near the El Paso region of Texas, and was arrested.

8. A day later, on September 11, 2022, she was issued a Form I-94 and paroled into the United States pursuant to INA § 212(d)(5)(A), 8 U.S.C. § 1182(d)(5)(A), also known as humanitarian parole, due to lack of bed space. She did not possess any lawful immigration status at that time.

9. On August 26, 2023, the petitioner filed an application for immigration benefits U.S. Citizenship and Immigration Services ("USCIS"), as well as an application for work authorization.

10. Separately, on March 11, 2024, the petitioner filed a Form I-821, Application for Temporary Protected Status ("TPS") with USCIS, which was approved on March 30, 2024. She also filed for, and was granted, an employment authorization document on the basis of that TPS approval.

11. On February 5, 2025, the Secretary of Homeland Security Kristi Noem determined that Venezuela no longer meets the conditions for its designation for TPS, and announced the termination of the 2023 Venezuela TPS designation under which this petitioner applied. That termination was enjoined by litigation until October 3, 2025, when the Supreme Court allowed the termination to take immediate effect. See National TPS Alliance, et al., v. Kristi Noem et al., No. 3:25-cv-01766 (N.D. Cal. March 31, 2025), and Noem v. Nat'l TPS Alliance, 145 S. Ct. 2728 (2025).

12. On the basis of the Secretary's redesignation, the petitioner's TPS was terminated on November 21, 2025.

13. On December 4, 2025, the petitioner reported for a Field Office Appointment Scheduler check-in with ICE ERO and was arrested pursuant to INA § 235(b) [8 U.S.C. § 1225(b)] as an alien subject to expedited removal.

14. On the same date, December 4, 2025, the petitioner was personally served with a Form I-862 Notice to Appear charging her as inadmissible under INA § 212(a)(6)(A)(i) [8 U.S.C. § 1182(a)(6)(A)(i)] for being present in the United States without admission or parole.

15. She was processed at 26 Federal Plaza at 10:09 a.m.. On December 5, 2025, at 10:30 p.m., she was transferred to Elizabeth, New Jersey. On December 7, 2025, at 7:19 p.m., she was transferred to Richwood Correctional Facility in Richwood, Louisiana.

16. As of the date of this declaration, there are no hearings scheduled in petitioner's matter before Immigration Court.

I hereby declare under the penalty of perjury that the above statements are true and correct.

Executed at Jena, Louisiana
this 8th day of December 2025.

MATTHEW W REAVES Digitally signed by MATTHEW W REAVES Date: 2025.12.08 15:35:46 -06'00'

Matthew W. Reaves
Assistant Field Office Director
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security