


**Regis Fernandez, Esq. (RF-0555)**  
**7 Federal Square**  
**Newark, New Jersey 07102**  
**(973) 297-0002 (tele)**  
**(973) 297-0003 (fax)**  
**Attorney for Petitioner**

**DETAINED-DELANEY HALL**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEW JERSEY**

**KATIA A. PAVON-FONSECA,** )  
 )  
 **A**  )  
 **Petitioner,** )  
 )  
 **v.** )  
 )  
 **PAM BONDI,** )  
 **Attorney General of the** )  
 **United States of America, and,** )  
 )  
 **KRISTI NOEM,** )  
 **Secretary of the Department of** )  
 **Homeland Security, (DHS) and,** )  
 )  
 **TODD LYONS,** )  
 **Acting Director,** )  
 **United States Immigration and** )  
 **Customs Enforcement (ICE), and,** )  
 )  
 **LUIS SOTO,** )  
 **Director,** )  
 **Delaney Hall Detention Facility,** )  
 **Respondents.** )  
 )

**Civil Action No.**

**Hon.**

**VERIFIED HABEAS CORPUS PETITION**

**INTRODUCTION**

1. The Petitioner is a 27-year-old married female native and citizen of Honduras, who has been detained at the Delaney Hall Detention Facility since her arrest by ICE on December 4, 2025 after attending her credible fear interview at the Newark Asylum office and passing that interview.

2. Petitioner hereby petitions the U.S. District Court to declare her arrest and or detention unlawful, stay her removal to outside of the New Jersey jurisdiction, and or either order her release so she may pursue her application for asylum, withholding and Convention against Torture.
3. Petitioner petitions this Court for an order declaring her detention is unlawful and improper without probable cause and that the procedures, including statutory authorization, used to arrest her improper.
4. ICE has detained the Petitioner unlawfully pursuant to Section 235 of the INA because Petitioner is not an “an arriving alien” pursuant to 8 C.F.R. §§1.2, 1001.1(q), 8 U.S.C §1101(a)13(A), but an alien “at-large” in the United States and has been so for the last 3 years. She should have never been arrested in the first place and requests outright release. In the alternative, she is entitled to a determination under §236, of a reasonable bond, release on recognizance set forth in the statute, and an order that this detention under INA 235 is unlawful.

#### **JURISDICTION**

5. This action arises under the United States Constitution and the Immigration and Nationality Act, 8 U.S.C. §§ 1101 et seq.. This Court has habeas corpus jurisdiction pursuant to 28 U.S.C. § 2241 et. seq., and Art. I & 9, Clause 2 of the United States Constitution (Suspension Clause). Petitioner is detained at the Delaney Hall Detention Center, New Jersey under the authority of the United States in violation of the Constitution and laws of the United States.

### **VENUE**

6. Venue lies in this Court because Petitioner is detained at the Delaney Hall Detention Center in Newark, New Jersey.

### **PARTIES**

7. Petitioner is a 27-year-old married female, native and citizen of Honduras who has been detained at the Delaney Hall Detention Facility since on or about December 4<sup>th</sup> 2025. She seeks issuance of a writ of habeas corpus.
8. Respondent Pam Bondi is sued in her official capacity as the Attorney General of the United States. In this capacity she is responsible for administering and enforcing the immigration laws pursuant to 8 U.S.C. § 1103 and is the Petitioner's legal custodian.
9. Respondent Kristi Noem is sued in her official capacity as Secretary of the Department of Homeland Security the agency in charge of administering and enforcing the immigration laws in New Jersey and is the Petitioner's legal custodian.
10. Respondent Todd Lyons is sued in his official capacity as the Acting Director of the United States Immigration and Customs Enforcement (ICE) the department within the Department of Homeland Security and in this capacity, he is responsible for administering and enforcing the immigration laws in New Jersey and is Petitioner's legal custodian.
11. Respondent Luis Soto is sued in his official capacity as the Director of the Delaney Hall Detention Facility and in this capacity, he is the Petitioner's actual physical custodian.

### FACTS

12. Petitioner, a 27-year-old married female, native and citizen of Honduras, having entered the U.S. on May 27, 2022 without inspection, has resided continuously since then in the United States and specifically, Barnegat, NJ.
13. When the Petitioner entered the United States she was detained and paroled into the U.S. under INA 212(d)(5)(A).
14. After having been paroled into the U.S., the Petitioner has reported to ICE as instructed.
15. On or about December 4, 2025, the USCIS summoned the Petitioner to a credible fear interview in connection to her asylum claim based on a particular social group (lesbian). She passed this credible fear interview and was placed in Removal Proceedings through the issuance of a Notice to Appear where she was alleged to have been an alien who has not been admitted into the U.S.
16. On December 4, 2025, at the same time that she passed her credible fear interview, she was also detained by ICE agents and subject to mandatory detention and taken to the Delaney Hall Detention Facility where she remains detained today.
17. Petitioner was summarily detained at her credible fear interview for no apparent reason other than the DHS's new mandatory detention policy for all aliens who were not "inspected or admitted."
18. The Petitioner does not have a final order of removal
19. The Petitioner's removal proceedings are now pending before the Elizabeth Immigration Court.

20. The Petitioner has no warrants or negative criminal history that would change circumstances to warrant his arrest and removal outside of the New Jersey jurisdiction.
21. Petitioner has exhausted all administrative remedies and his detention is premature and unlawful but Respondents nonetheless seek to continue to detain her and remove her from the U.S. under a statute for aliens that are treated as if they were at the border.
22. Petitioner's removal from the United States cannot be effectuated in the reasonably foreseeable future. Absent judicial review of his custody claim, Petitioner will suffer irreparable injury by being deprived of her physical liberty. She seeks the only avenue of judicial review available to her, habeas review. Moreover, the Board of Immigration Appeals has recently upheld the DHS' new mandatory detention scheme in Matter of Yahure Hurtado, 29 I&N Dec. 216 (BIA 2025)(Upholding mandatory detention to all aliens who entered without inspection) and Matter of Q.Li, 29 I&N Dec. 66 (BIA 2025)(Upholding mandatory detention for an alien who is released into the U.S. on parole and re-detained under Section 235(b) years later without cause).

**CLAIM FOR RELIEF**  
**FIRST CLAIM FOR RELIEF**

**Violation of the Due Process Clause of the Fifth Amendment of the United States Constitution (Substantive Due Process); 5 U.S.C. §§ 702, 706**

23. Petitioner restates and realleges all paragraphs as if fully set forth here. Petitioner had been continuously living in the United States for three years when she was unlawfully arrested and unlawfully detained. Accordingly,

Petitioner is being detained in violation of her Constitutional right to Due Process under the Fifth Amendment.

## **SECOND CLAIM FOR RELIEF**

### **DHS Policy Expanding Expedited Removal Beyond 2-Year Statutory Limit is Contrary to Law (APA – 5 U.S.C. § 706(2)(A))**

24. Petitioner restates and realleges all paragraphs as if fully set forth here. The APA provides that courts “shall . . . hold unlawful and set aside agency action” that is “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A); see also 8 U.S.C. § 1252(e)(3)(A) (authorizing actions challenging policies implementing the expedited-removal statute as “in violation of law”).
25. The expedited removal statute, 8 U.S.C. § 1225, is limited in its scope and is generally not meant to replace 8 U.S.C. § 1229a as the “sole and exclusive procedure” for determining whether a noncitizen may be admitted or removed from the United States. *Id.* § 1229a(a)(3). Accordingly, not all noncitizens are amenable to having their cases adjudicated in expedited removal proceedings.
26. One limit on expedited removal relates to a noncitizen’s time in the United States. Expedited removal may be applied to any noncitizen “who has not been admitted or paroled into the United States, and who has not affirmatively shown, to the satisfaction of an immigration officer, that the [noncitizen] has been physically present in the United States continuously for the 2-year period immediately prior to the date of determination of inadmissibility under this subparagraph.” 8 U.S.C. § 1225(b)(1)(A)(iii)(II) (emphasis added).
27. Governing regulations require DHS to take various procedural steps, including recording a sworn statement concerning the underlying facts

with Forms I-867A&B and providing the noncitizen with Form I-860, as part of a determination of inadmissibility under 8 U.S.C. § 1225(b)(1)(A)(iii)(II). See 8 C.F.R. § 235.3(b)(2).

28. In this case, DHS did not make a determination of inadmissibility under the relevant subparagraph.
29. On information and belief, on or about May 20, 2025, DHS issued written Guidance instructing DHS agents to place noncitizens who have been in the country for more than two years.
30. The Guidance is contrary to law, including 8 U.S.C. § 1225(b)(1)(A)(iii)(II) and 8 C.F.R. § 235.3(b)(2).

### **THIRD CLAIM FOR RELIEF**

#### **DHS Policy Expanding Expedited Removal Beyond 2-Year Statutory Limit is Arbitrary and Capricious (APA – 5 U.S.C. § 706(2)(A))**

31. Petitioner restates and realleges all paragraphs as if fully set forth here.
32. The APA provides that courts “shall . . . hold unlawful and set aside agency, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). action” that is “arbitrary, capricious.
33. On information and belief, on or about May 20, 2025, DHS issued written Guidance instructing DHS agents to pursue expedited removal for people who have been present in the United States for more than two years without having received a “determination of inadmissibility” under 8 U.S.C. § 1225(b)(1)(A)(iii)(II).
34. On information and belief, this Guidance is arbitrary and capricious because, among other things, it does not satisfy the agency’s duty to provide a reasoned explanation for its change in policy, *Encino Motorcars, LLC v. Navarro*, 579 U.S. 211, 221 (2016); fails to consider important aspects of the problem, *State Farm*, 463 U.S. at 43; and overlooks significant reliance interests, see *Regents*, 591 U.S. at 1.

### **FOURTH COUNT FOR RELIEF**

**Violation of 8 U.S.C. §§ 1226(a), 1225(b),  
Mandatory Detention For Those Seeking Admission**

35. Petitioner restates and realleges all paragraphs as if fully set forth here.
36. On May 23, 2022, Petitioner initially presented herself for inspection upon entry. CBP arrested and detained her. She was released with her children and allowed them to enter the United States.
37. Because DHS previously exercised its discretion and to release her from detention under 8 U.S.C. § 1226(a)(2)(B), and in its discretion released the Petitioner from detention, the government lacks authority to re-detain her under § 1225(b)'s mandatory provisions. At the time of Petitioner's re-arrest on December 4, 2025, Petitioner had been living in the United States for over three years, had a pending asylum application. Therefore, Petitioner was not subject to detention pursuant to § 1225(b), and any custody must proceed, if at all, under § 1226(a).
38. Petitioner's continuing re-detention is therefore unlawful.

**FIFTH CLAIM FOR RELIEF  
Continued Detention Constitutes A Violation Of Due Process**

39. Petitioner incorporates all factual allegations as though restated here.
40. ICE detained Petitioner without reasonable suspicion and continues to do so in violation of his constitutional rights protected under the Fifth Amendment.
41. The Due Process Clause of the Fifth Amendment forbids the government from depriving any person of liberty without due process of law. U.S. Const. amend. V.
42. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause [of the Fifth Amendment] protects."

43. First, immigration detention must always “bear[] a reasonable relation to the purpose for which the individual was committed.”
44. Whereas here, the government has released the Petitioner on parole to apply for asylum, in which the Petitioner did, Respondent's cannot simple re-arrest and re-detain Petitioner for no reason at all.
45. The Government's authority to arrest a noncitizen and revoke their release is proscribed by the Due Process Clause because it is well-established that individuals released from incarceration have a liberty interest in their freedom. To protect that interest, due process requires notice and a hearing, prior to any re-arrest, at which hearing the individual is afforded the opportunity to advance their arguments as to why they're release should not be revoked.
46. Second, the Due Process Clause requires that any deprivation of Petitioner's liberty be narrowly tailored to serve a compelling government interest. See Reno v. Flores, 507 U.S. 292, 301-02 (1993) (holding that due process “forbids the government to infringe certain ‘fundamental’ liberty interests at all, no matter what process is provided, unless the infringement is narrowly tailored to serve a compelling state interest”).
47. Petitioner's ongoing imprisonment does not satisfy that rigorous standard, as there was no material change since the Petitioner was released from custody, and had a pending asylum case.
48. Third, the Due Process Clause includes protection against unlawful or arbitrary personal restraint or detention.
49. Detaining Petitioner was arbitrary because he had initially been released and has no criminal arrests or convictions.

#### **PRAYER FOR RELIEF**

WHEREFORE, Petitioner prays that this Court:

1. Issue a Writ of Habeas Corpus directed to Respondents requiring them to immediately released the Petitioner and had not rearrest the Petitioner absent a

final order of removal or a meaningful change in her circumstances. In the alternative, the Petitioner should be afforded an individualized bond hearing that comports with due process.

2. Award Petitioner costs and attorney's fees pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412.
3. Grant any other and further relief that this Court may deem necessary and proper.

s/ Regis Fernandez  
Regis Fernandez, Esq. (RF-0555)  
7 Federal Square  
Newark, NJ 07102  
(973) 297-0002 (Tele)  
(973) 297-0003 (Fax)  
Attorney for Petitioner

Dated: December 5, 2025

**VERIFICATION**

I, Katia A. Pavon Fonseca, declare under penalty of perjury in accordance with 28 U.S.C. § 1746 as follows:

1. I am the plaintiff-petitioner in this matter and am personally familiar with the facts of my case;
2. I have read the allegations contained in the foregoing Complaint and to the best of my knowledge, those allegations are true based upon my personal knowledge, information and belief.

Executed on December 5, 2025

s/ Katia A. Pavon-Fonseca  
KATIA A. PAVON-FONSECA

**VERIFICATION BY COUNSEL**

I, Regis Fernandez, declare under penalty of perjury in accordance with 28 U.S.C. § 1746 as follows:

1. I am the attorney for plaintiff-petitioner in this matter and am personally familiar with the facts of his case;
2. I have read the allegations contained in the foregoing Complaint and to the best of my knowledge, those allegations are true based upon my personal knowledge, information and belief.
3. I have also reviewed the documents attached to this habeas petition and confirm that they are true copies of the originals and that all the facts or allegations ascertained therein are true and correct to the best of my knowledge and experience.

Executed on December 5, 2025

s/ Regis Fernandez  
REGIS FERNANDEZ, ESQ.


**LIST OF EXHIBITS**

- A. Petitioner's Parole Document;
- B. Petitioner's Notice to Appear in Removal Proceedings

**A**

DEPARTMENT OF HOMELAND SECURITY  
U.S. Immigration and Customs Enforcement

Date: June 07, 2022

In Reference to: A# 

INTERIM NOTICE AUTHORIZING PAROLE

This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) has decided to parole you from its custody pursuant to its authority under section 212(d)(5)(A) of the Immigration and Nationality Act. This notice is being issued to you in lieu of Form I-94, *Arrival-Departure Record*, see 8 C.F.R. § 235.1(h)(2), and you should maintain a copy of this letter in your possession at all times

Your parole authorization is valid for one year beginning from the date on this notice and will automatically terminate upon your departure or removal from the United States or at the end of the one-year period unless ICE provides you with an extension at its discretion. ICE may also terminate parole on notice prior to the automatic termination date. Parole is entirely within the discretion of ICE and can be terminated at any time and for any reason. Your parole is not valid for work authorization and is not an admission in lawful status.

Parole is conditioned on you complying with the terms and conditions of your release. You must notify ICE and the immigration judge of any address correction or address change. You must report for every scheduled hearing before the immigration court and every appointment as directed by ICE (including for removal from the United States should you become subject to a final removal order). You must not violate any local, State or Federal laws or ordinances. You must comply with any other specified conditions if identified separately.


I certify that I received a copy of this notice.

PAVON-FONSECA, KATIA	x	6/7/2022
Alien Name	Alien Signature	Date

**CERTIFICATE OF SERVICE**

I certify that on today's date, I served the respondent a copy of this parole notice by the following method (as checked):

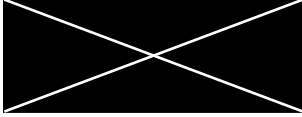
In Person     Other \_\_\_\_\_

DO F. Orozco		6/7/2022
ICE Official Name	ICE Official Signature	Date

Continuation Page for Interim Notice Authorizing Parole

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To: PAVON-FONSECA, KATIA



Date: June 07, 2022

File: A 

Bond: (Parole with Reporting Requirements)

You have been released from service custody pending a final decision in your exclusion/deportation hearing. It is understood that you will be residing at the above address. As stated on the previous page, you are required to notify the Immigration Judge (at the address shown below) of any address correction or address change. When doing so, be sure to include your name and the File Number shown above in your written communication. The attached form, EOIR-33 can be used for this purpose.

Office of the Immigration Judge  
970 Broad Street, Room 1200, 12th Floor  
Newark, NJ, 07102

You must report in person to: Mount Laurel Sub Office (Non-Detained/ATD)

532 Fellowship Road  
Mount Laurel, NJ, 8054  
(856) 787-3499

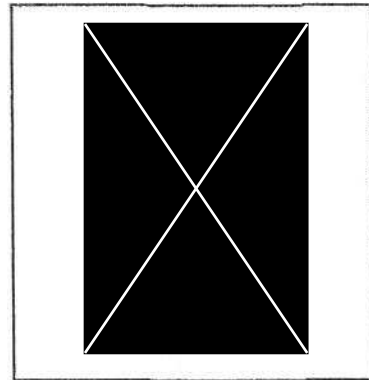
At: \_\_\_\_\_

Thursday, July 7, 2022  
@ 09:00 AM

On: \_\_\_\_\_



PHOTO



RIGHT INDEX

**B**



Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at http://www.ice.gov/contact/ero, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Upon information and belief, the language that the alien understands is SPANISH

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an Immigration judge and request my hearing be scheduled.

Before: \_\_\_\_\_ (Signature of Respondent)
Date: \_\_\_\_\_
\_\_\_\_\_  
(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on 12/04/2025, in the following manner and in compliance with section 239(a)(1) of the Act.

- [X] in person [ ] by certified mail, returned receipt # \_\_\_\_\_ requested [ ] by regular mail
[X] Attached is a credible fear worksheet.
[X] Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the SPANISH language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

hania Pavón
(Signature of Respondent if Personally Served)

Maria Rappleyea LAS
(Signature and Title of officer)

**Authority:**

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

**Purpose:**

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

**Routine Uses:**

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

**Disclosure:**

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.