

Julio Cesar Arnedo



Karen Polo as Next Friend

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SOUTHERN DISTRICT OF NEW YORK

26 CV 0244

Civil Action No.:

Petition for Writ of Habeas Corpus  
Pursuant to 28 U.S.C. § 2241  
Oral Argument Requested

Julio Cesar Arnedo, and  
Karen Polo as Next Friend.

Petitioners/Plaintiffs,

v.

**LAWRENCE CATLETTI**, in his official capacity as Colonel of Correctional Command Staff for Orange County, New York;

**MARCUS CHARLES**, in his official capacity as acting Executive Associate Director, Enforcement and Removal Operations;

**WILLIAM JOYCE**, in his official capacity as Acting New York Field Office Director for U.S. Immigration and Customs Enforcement;

**KRISTI NOEM**, in her official capacity as Secretary, U.S. Department of Homeland Security;

**TODD LYONS**, in his official capacity as Director, U.S. Immigration and Customs Enforcement; U.S. Department of Homeland Security; and U.S. Immigration and Customs Enforcement

Respondents/Defendants.

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SOUTHERN DISTRICT OF NEW YORK

INTRODUCTION

1. Julio Cesar Arnedo (hereinafter "Petitioner") is a resident of New York who was arrested by Immigration and Customs Enforcement (I.C.E.) on January 1, 2026.
2. Petitioner was arrested on the street, on 77<sup>th</sup> Street and Roosevelt Avenue in Jackson Heights, Queens, on New Year's Day, January 1, 2026 at 1:30 p.m. He was in the driver's seat of car that was parked. A group of men in civilian clothing and hats

Julio Cesar Arnedo

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Karen Polo as Next Friend

covering their heads approached the car. Some of the men wore vests that said Police.

They broke the window of the driver's side window and dragged petitioner out of the car.

They just said, "let's go." The men then showed a photo of another person who did not look like the petition. He was then taken away in one of the 2 cars that were there.

3. Petitioner is a noncitizen who has been detained in immigration custody for six days, even though no neutral decisionmaker, whether a federal judge or an immigration judge, has conducted a hearing to determine whether this incarceration is warranted based on danger or flight risk.
4. Petitioner's unlawful detention without a hearing on danger and flight risk violates the Due Process Clause of the Fifth Amendment.
5. Petitioner's detention has also placed undue burden on his ability to search for or consult with counsel.
6. Additionally, Respondents have not provided Petitioner with the opportunity to ask for a credible fear interview. He has been in the country for over 4 years. Petitioner also has limited access to counsel due to being detained without meaningful interpretation services or phone access, but intends to pursue multiple immigration claims in removal hearings.
7. Petitioner is not a flight risk due to the following reasons:

Petition has complied with all that has been request of him since entering the United States. Upon entering the United States petition was issued an Order of Release on Recognizance Signed by Supervising Detention and Deportation Officer Garcia E3973 (Tab A). He was instructed to report to a deportation office on February 1, 2022 at 26 Federal Plaza at 8 am. He complied and is demonstrated by Officer Kennedy notes on

Julio Cesar Arnedo

PRO SE

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Karen Polo as Next Friend

his Order of Release on Recognizance. (Tab B) He was given court dates to attend on September 13, 2022. He retained an attorney, Michael S. Juarez, who appeared with him. On November 7, 2022, he applied for asylum (Tab C) and was issued a receipt on December 15, 2022. (Tab D) A merits hearing date was never set. Since his incarceration a new date has been set on January 12, 2026, in Goshen New York. He has complied with all that was requested of him.

8. Petitioner merits positive discretion because: Petitioner has no criminal history or history of violence. His is a loving partner to Karen Polo for more than 12 years and they are living together and raising their son K [REDACTED] who is 11 years old. As a family they are a member of their local Christian church, Aliento de Vida, located at [REDACTED]. Their son [REDACTED] and is an active 6th grader who loves to play football. Petitioner is gainfully employed by Guardian Services Industries Inc. doing maintenance and janitorial work in a large building in Long Island City.
9. Petitioner suffers from the following health conditions: He has suffered from a lifelong heart condition and is currently under the regular care of Dr. [REDACTED] who manages his condition.
10. Petitioner's ongoing detention has caused enormous harm by separating him from his 11 year old son family, friends, and his community and risks further harm if not remedied.
11. I.C.E.'s actions violate Petitioner's rights under the Fifth Amendment of the U. S. Constitution, the INA, the Administrative Procedure Act and its own federal regulations.
12. Accordingly, this Court should declare I.C.E.'s actions unlawful, join his transfer outside of this District, and order his immediate release. In the alternative, Petitioner must be transferred to a facility closer to New York City so as not to be deprived of counsel.

Julio Cesar Arnedo

PRO SE



Karen Polo as Next Friend

**PARTIES**

13. Petitioner, *Julio Cesar Arnedo*, is a 33-year-old individual who has lived in the United States since 2021. Petitioner is detained at Orange County Correctional Facility at 110 Wells Farm Road, Goshen, NY 10924. Petitioner is in custody and direct control of Respondents and their agents.
14. Respondent Lawrence Catletti is the Colonel of Correctional Command Staff for the Orange County, New York. He is named in his official capacity as a person in charge of the facility holding the Petitioner. In this capacity the Respondent Catletti is the immediate physical custodian responsible for the detention of the petitioner.
15. Respondent Marcos Charles is the U.S. Immigration and Customs Enforcement (ICE) Enforcement and Removal Operation (ERO) Action Executive Associate Director. As the senior official performing the duties as the Executive Associate Director of ICE's ERO, he is responsible for the administration and enforcement of Petitioner. Respondent regularly and routinely transacts business in the Southern District of New York; is legally responsible for pursuing any effort to detain and arrest the Petitioner.
16. Respondent William P. JOYCE is named in his official capacity as the Acting Field Office Director of the New York Field Office for ICE within the United States Department of Homeland Security. In this capacity, he is responsible for the administration of immigration laws and the execution of detention and removal determinations and is a custodian of petitioners. Respondent Joyce's address is New York ICE Field Office Director, 26 Federal Plaza, New York, New York 10278.
17. Respondent Todd LYONS is the Acting Director of ICE. As the Senior Official

Julio Cesar Arnedo

PRO SE

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Karen Polo as Next Friend

Performing the Duties of the Director of ICE, he is responsible for the administration and enforcement of the immigration laws of the United States; routinely transacts business in the Southern District of New York; is legally responsible for pursuing any effort to remove the Petitioner; and as such is a custodian of the Petitioner. Respondent LYONS's address is Immigration and Customs Enforcement, 500 12th St. SW, Mail Stop 5900, Washington, DC 20536-5900.

18. Respondent Kristi Noem is named in her official capacity as the Secretary of Homeland Security in the United States Department of Homeland Security. In this capacity, she is responsible for the administration of the immigration laws pursuant to Section 103(a) of the INA, 8 U.S.C. § 1103(a) (2007); routinely transacts business in the Southern District of New York; is legally responsible for pursuing any effort to detain and remove the Petitioner; and as such is a custodian of the Petitioner. Respondent Noem's address is U.S. Department of Homeland Security, Office of the General Counsel, 2707 Martin Luther King Jr. Ave. SE, Washington, DC 20528-0485.5.

19. Respondent Pamela Bondi is Attorney General of the United States. In this capacity, she routinely transacts business in the Southern District of New York; is responsible for the administration of the immigration laws pursuant to Section 103(a) of the INA, 8 U.S.C. § 1103(g)(2007); and as such is a custodian of the Petitioner. Respondent Bondi's address is U.S. Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530.

#### **Jurisdiction and Venue**

20. This Court has jurisdiction under the U.S. Constitution. U.S. Const. art. I § 9, cl. 2 ("The privilege of the Writ of Habeas Corpus shall not be suspended, unless when in Cases of

Julio Cesar Arnedo

PRO SE

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Karen Polo as Next Friend

Rebellion or Invasion the public safety may require.”). The Suspension Clause protects the right to the writ of habeas corpus where no adequate or effective alternative remedy exists. *See Boumediene v. Bush*, 553 U.S. 723, 745 (2008).

21. This Court also has subject matter jurisdiction under 28 U.S.C. § 2241 (Habeas Corpus); 28 U.S.C. § 1331 (Federal Question); 28 U.S.C. § 1651 (the All-Writs Act); and 5 U.S.C. § 701 (the Administrative Procedure Act).
22. This Court has additional remedial authority under 28 U.S.C. §§ 2201-02 (the Declaratory Judgment Act), to grant injunctive and declaratory relief.
23. Administrative exhaustion is unnecessary as it would be futile.
24. Venue is proper in the U.S. District Court for the Southern District of New York because Respondents are officers of United States agencies, and at the time of filing, Petitioner is detained at 26 Federal Plaza, within the jurisdiction of the Southern District of New York. A substantial part of the events or omissions giving rise to these claims occurred in New York County, and there is no real property involved in this action. *See* 28 U.S.C. § 1391(e)(1).

#### **RELEVANT FACTS AND PROCEDURAL HISTORY**

25. Petitioner is a long-time resident of New York City who entered the United States in 2021.
26. Petitioner first came to the United States in order to: seek asylum.
27. Prior to his detention, Petitioner was a valued employee at Guardian Services Industries Inc. doing maintenance and janitorial work in a large building in Long Island City.
28. His is a loving partner to Karen Polo for more than 12 years and they are living together and raising their son, K~~XXXXXXXXXX~~, who is 11 years old. As a family they are

Julio Cesar Arnedo

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Karen Polo as Next Friend

PRO SE

a member of their local Christian church, Aliento de Vida, located at [REDACTED]

Their son attends [REDACTED] and is an active 6th grader who loves to play football.


29. Petitioner suffers from the following health conditions: He has suffered from a lifelong heart condition and is currently under the regular care of Dr. [REDACTED] who manages his condition.
30. Petitioner's ongoing detention has caused enormous harm by separating him from life partner and their 11 year old son, his extended family including aunts and cousins, friends, and his community and risks further harm if not remedied.
31. Petitioner has aunt, Miriam Garcia, and cousin, Luis Albert Torres, who are both United States Citizens.
32. Petitioner is pursuing the following claims in removal hearings: Pending application for Asylum, Withholding of Removal and Convention Against Torture.
33. Circumstances of arrest: Petitioner was arrested on the street, on 77<sup>th</sup> Street and Roosevelt Avenue in Jackson Heights, Queens, on New Year's Day, January 1, 2026 at 1:30 p.m. He was in the driver's seat of car that was parked with his partner Karen Polo. A group of men in civilian clothing and hats covering their heads approached. Some of the men were wearing vests that said Police. They broke the window of the driver's side window and dragged him out of the car. They just said, "let's go." The men then showed a photo of another person who did not look like the petition. He was then taken away in one of the 2 cars that were there.
34. Petitioner believes he is currently being held in immigration detention at Orange County Correctional Facility at 110 Wells Farm Road, Goshen, NY 10924 or another New York based holding facility.

Julio Cesar Arnedo

PRO SE



Karen Polo as Next Friend

35. Petitioner has been detained for 6 days.
36. Petitioner has a heart murmur and does not have access to adequate medical attention in Detention.
37. Petitioner is not a flight risk because he does not have a criminal history. He is raising his 11 year old son with his longtime partner, Karen Polo. He is gainfully employed. His son is in 6<sup>th</sup> grade at  and loves to play soccer. They are a parishioner at their local church and he has a pending asylum claim.
38. Petitioner is not a danger to society because he does not have a criminal record nor history of violence. They are a member of their community church and works to support their family with work authorization.
39. Therefore, Petitioner brings this action to seek injunctive, habeas, and declaratory relief ordering Respondents to release him/her. Petitioner's ongoing detention—the purpose of which is presumably remove them from the United States—flow from their unlawful detention on or around January 1, 2026.

### **LEGAL FRAMEWORK**

#### ***I. Petitioner cannot be subject to expedited removal.***

40. Since mid-May 2025, the DHS has been employing a new campaign by which counsel for DHS moves to dismiss cases in Immigration Court in order to immediately pursue expedited removal. Upon dismissal, ICE officers, waiting in Immigration Court buildings, invoke expedited removal to arrest individuals leaving their hearings<sup>1</sup>

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<sup>1</sup> See, e.g., Gwynne Hogan, ICE Agents Arrest at Least Seven Immigrants as Courthouse Blitz Continues, *The City* (May 29, 2025), available at <https://www.thecity.nyc/2025/05/29/ice-arrests-migrants290-broadway-court-trump/>; Luis Ferré-Sadurní and Dana Rubenstein, ICE, Shifting Tactics, Detains High School Student at N.Y.C. Courthouse, *The New York Times* (May 27, 2025), available at

Julio Cesar Arnedo

PRO SE

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Karen Polo as Next Friend


41. It appears that ICE's selection of individuals to detain in Immigration Courts is random, as individuals in various postures in their immigration proceedings have been detained.
42. ICE has also been detaining increased numbers of individuals and families at routine check-ins, even those with a history of regularly attending their check-ins and following the terms of their Orders of Release on Recognizance.
43. Petitioner is not a flight risk and has a vested interest in continuing to pursue his/her immigration claims.
44. Petitioner demonstrates a history of responsibility and law abiding nature through his attendance of the following court hearings and ICE check-ins throughout the period of his immigration application proceedings: Upon entry into the United States, he was Ordered Released on his own Recognizance by ICE. He attended his ICE check in as required on February 1, 2022, as seen his ICE check in sheet. He applied for asylum and attended his court dates.
45. Petitioner cannot be subjected to expedited removal as he is currently in removal proceedings under section 240 of the INA (8 U.S.C. 1229a), seeking asylum, and has lived in the United States for over two years.
46. Pursuant to 28 U.S.C. § 2243, the Court either must grant the instant petition for writ of habeas corpus or issue an order to show cause to Respondents, unless Petitioner is not entitled to relief. If the Court issues an order to show cause, Respondents must file a

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<https://www.nytimes.com/2025/05/27/nyregion/new-york-student-arrested-ice.html>; Ted Hesson and Kristina Cooke, ICE arrests migrants at courthouses, opens door to fast-track deports, Reuters (May 23, 2025), available at <https://www.reuters.com/world/us/ice-arrests-migrants-courthouses-opens-door-fast-track-deportations-2025-05-23/>; Camilo Montoya-Galvez and Nidia Cavazos, ICE ending migrants' court cases in order to arrest and move to deport them, CBS News (May 23, 2025), available at <https://www.cbsnews.com/news/ice-ending-migrants-court-cases-arrest-move-to-deport-them/>; Michael Elsen-Rooney, A Bronx high schooler showed up for a routine immigration court date. ICE was waiting., Chalkbeat (May 26, 2025), available at <https://www.chalkbeat.org/newyork/2025/05/27/bronx-high-school-student-detained-by-immigration-ice-agents/>.

Julio Cesar Arnedo

PRO SE

  
Karen Polo as Next Friend

response “within *three days* unless for good cause additional time, *not exceeding twenty days*, is allowed.” 28 U.S.C. § 2243 (emphasis added).

47. “It is well established that the Fifth Amendment entitles [noncitizens] to due process of law in deportation proceedings.” *Demore v. Kim*, 538 U.S. 510, 523 (2003) (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993)). “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 protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

48. This fundamental due process protection applies to all noncitizens, including both removable and inadmissible noncitizens. *See id.* at 721 (Kennedy, J., dissenting) (“[B]oth removable and inadmissible [noncitizens] are entitled to be free from detention that is arbitrary or capricious.”). It also protects noncitizens who have been ordered removed from the United States and who face continuing detention. *Id.* at 690.

49. The Court’s ruling in *Zadvydas* is rooted in due process’s requirement that there be “adequate procedural protections” to ensure that the government’s asserted justification for a noncitizen’s physical confinement “outweighs the ‘individual’s constitutionally protected interest in avoiding physical restraint.’” *Id.* at 690 (quoting *Kansas v. Hendricks*, 521 U.S.

***A. Defendants’ Pattern of Illegal Conduct Is Officially Sanctioned***

50. Defendants’ unlawful stops, arrests, denial of access to counsel and conditions immigration courts and ICE offices, and Moshannon Valley Processing Center are the predictable result of directives from top officials to agents and officers.

Julio Cesar Arnedo

PRO SE

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Karen Polo as Next Friend

51. In January 2025, the administration gave ICE field offices an arrest quota of 75 arrests a day.<sup>2</sup> As offices attempted to carry out such a mandate, workplace raids increased,<sup>3</sup> ICE check-ins became traps, and courthouse arrests surged.<sup>4</sup> Also, to help meet the quota, the administration granted agencies outside of DHS immigration enforcement powers.<sup>5</sup>
52. Meanwhile, the administration began systematically dismantling internal accountability mechanisms and restraints on immigration agents' and officers' conduct. The administration shut down multiple oversight agencies (retaining only a version of their former selves after the administration was sued).<sup>6</sup> Investigations were closed. Officers no longer had to abide by enforcement priorities.<sup>7</sup> Long-standing guidance restricting enforcement operations in sensitive locations—schools, hospitals, places of worship and public demonstrations—was rescinded.<sup>8</sup>

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<sup>2</sup> Nick Miroff & Maria Sacchetti, Trump Officials Issue Quotas to ICE Officers to Ramp Up Arrests, *The Washington Post* (last updated Jan. 26, 2025), <https://www.washingtonpost.com/immigration/2025/01/26/ice-arrests-raids-trump-quota/>.

<sup>3</sup> Marianne LeVine, et al., ICE is Arresting Migrants in Worksite Raids. Employers are Largely Escaping Charges, *The Washington Post* (June 30, 2025), <https://www.washingtonpost.com/immigration/2025/06/30/ice-raids-arrests-workers-companies/> (noting an April announcement by ICE officials that the agency had arrested more than 1,000 workers during Trump's first 100 days and collecting stories of workplace raids across the country); Mark Moran, ICE Detains More than 530 People in Workplace 'Raids' in U.S. Northeast, *United Press International* (Jan. 23, 2025), [https://www.upi.com/Top\\_News/US/2025/01/23/ice-details-538-ice-workplace-raids/7811737692376/](https://www.upi.com/Top_News/US/2025/01/23/ice-details-538-ice-workplace-raids/7811737692376/).

<sup>4</sup> Julia Ainsley, Trump admin tells immigration judges to dismiss cases in tactic to speed up arrests, *NBC News* (June 11, 2025), <https://www.nbcnews.com/politics/national-security/trump-admin-tells-immigration-judges-dismiss-cases-tactic-speed-arrest-rcna212138>; Luis Ferré-Sadumi, Inside a Courthouse, Chaos and Tears as Trump Accelerates Deportations, *N.Y. Times* (June 12, 2025),

<sup>5</sup> Press Release, DHS, Statement from a DHS Spokesperson on Directive Expanding Immigration Law Enforcement to Some Department of Justice Officials (Jan. 23, 2025), <https://www.dhs.gov/news/2025/01/23/statement-dhs-spokespersondirective-expanding-immigration-law-enforcement>.

<sup>6</sup> Nicolae Viorel Butler, Court Forces DHS to Preserve Immigrant Rights Offices, *Migrant Insider* (May 27, 2025), [https://migrantinsider.com/p/court-forces-dhs-to-preserve-immigrant/?utm\\_source=CLINIC%2BMail&utm\\_campaign=f9e1ec6428-tips-6-2-25&utm\\_medium=email&utm\\_term=0\\_663ab9ab77-284225192](https://migrantinsider.com/p/court-forces-dhs-to-preserve-immigrant/?utm_source=CLINIC%2BMail&utm_campaign=f9e1ec6428-tips-6-2-25&utm_medium=email&utm_term=0_663ab9ab77-284225192)

<sup>7</sup> Press Release, DHS, Statement from a DHS Spokesperson on Directives Expanding Law Enforcement and Ending the Abuse of Humanitarian Parole (Jan. 21, 2025), <https://www.dhs.gov/news/2025/01/21/statement-dhs-spokesperson-directives-expanding-law-enforcement-and-ending-abuse>

<sup>8</sup> Marisa Kabas, ICE agents get green light to make unjustified warrantless arrests, *The Handbasket* (June 12, 2025), <https://www.thehandbasket.co/p/ice-warrantless-arrests-castanon-nava>.

Julio Cesar Arnedo

PRO SE



Karen Polo as Next Friend

53. But these changes were not enough, according to the administration. In late May, Deputy Chief of Staff Stephen Miller summoned 25 ERO Field Office Directors and 25 HSI Special Agents to a meeting to demand that “everybody” be targeted.<sup>9</sup>

54. Under Miller’s directive, agents no longer needed to develop vetted target lists of individuals suspected of being in the United States unlawfully. ICE agents were instructed in an email to “aggressively “push the envelope,” including by pursuing “collaterals”—individuals that by definition would not have warrants.<sup>10</sup>

55. The administration set a new arrest quota of 3,000 arrests per day and reportedly threatened job consequences if officials failed to meet arrest quota.<sup>11</sup>

56. The overriding message to agents and officers carrying out immigration operations on the ground was to prioritize arrest numbers, regardless of the law. Agents and officers were granted sweeping discretion to achieve this goal.

***B. Defendants’ Illegal Conduct Will Continue if Not Enjoined***

57. The federal government has repeatedly made clear its intent to continue its operations and unlawful stops, arrests, and detentions. Defendants have been candid about their determination to continue pursuing these unlawful policies and practices, unless this Court enjoins them from doing so.

58. While immigration enforcement may be carried out lawfully, these statements demonstrate a commitment to continue operations at any cost, including at the expense of

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<sup>9</sup> Stuard Anderson, Stephen Miller’s Order Likely Sparked Immigration Raids and Protests, Forbes, Jun. 9, 2025, <https://www.forbes.com/sites/stuardanderson/2025/06/09/stephen-millers-order-likely-sparked-immigration-arrests-and-protests/>.

<sup>10</sup> José Olivares, US immigration officers ordered to arrest more people even without warrants, The Guardian (June 4, 2025), <https://www.theguardian.com/us-news/2025/jun/04/immigration-officials-increased-detentions-collateral-arrests>.

<sup>11</sup> Elizabeth Findell, et al., supra note 2; Julia Ainsley, et al., A sweeping new ICE operation shows how Trump’s focus on immigration is reshaping federal law enforcement, NBC News (June 4, 2025), <https://www.nbcnews.com/politics/justicedepartment/ice-operation-trump-focus-immigration-reshape-federal-lawenforcement-rcna193494>

Julio Cesar Arnedo

PRO SE

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Karen Polo as Next Friend

individuals' constitutional and legal rights. Plaintiffs have already been harmed, and they face a reasonable likelihood of continuing harm, as a result of Defendants' unlawful policies and practices described herein.

59. Plaintiffs have no plain, adequate, or complete remedy at law to address the wrongs described herein. Injunctive and declaratory relief is necessary to redress their ongoing injuries.

### *II. Suspicion-less Stops Based on Racial Profiling*

58. The constitutional, statutory, and regulatory framework is clear about the practices immigration officers must follow. The Fourth Amendment protects "[t]he right of the people to be secure in their persons . . . against unreasonable searches and seizures." U.S. Const. amend. IV. "Except at the border and its functional equivalents," immigration agents may stop individuals in public only after identifying "specific articulable facts, together with rational inferences from those facts, that reasonably warrant suspicion" of a violation of immigration law. United States v. Brignoni-Ponce, 422 U.S. 873, 884 (1975); Benitez-Mendez v. I.N.S., 752 F.2d 1309, 1311 (9th Cir. 1983), amended, 760 F.2d 907 (9th Cir. 1983); see also 8 C.F.R. § 287.8(b)(2). Reasonable suspicion cannot be based "on broad profiles which cast suspicion on entire categories of people without any individualized suspicion of the particular person to be stopped." United States v. Rodriguez Sanchez, 23 F.3d 1488, 1492 (9th Cir. 1994).

59. The federal agents that detained Petitioner did not abide by that framework.

60. Petitioner was not provided or demonstrated a warrant for his/her arrest while being detained.

Julio Cesar Arnedo

PRO SE



Karen Polo as Next Friend

61. The manner in which the foregoing stop had been conducted bears no hallmarks of reasonable suspicion: there are no indicia that agents had any specific articulable facts sufficient to justify a seizure. Instead, only those who appear to be nonwhite, at a location frequented by immigrants, were seized.

62. It is illegal for Defendants to stop anyone—U.S. citizens or not— without reasonable suspicion. But predictably, in addition to noncitizens, Defendants’ practices have led to numerous U.S. citizens who work, reside, or just happen to be in neighborhoods with large numbers of people of color also getting swept up.

*A. A Show of Force: Intimidation, Violence, and Anonymity*

63. While the government may describe the encounters agents and officers are having with individuals as consensual, they are far from that. A stop, even brief, must be supported by reasonable suspicion if “a reasonable person would [believe] that he was not free to leave.” See United States v. Mendenhall, 446 U.S. 544, 554 (1980).

64. Agents and officers have employed aggressive tactics with alarming regularity, but they have also refused to identify themselves or what agency they are with when asked.<sup>2</sup> Such refusal to identify themselves endangers public safety, frustrates any efforts at accountability, including in this case, and ultimately normalizes lawless and dangerous conduct behind the shield of anonymity.

65. Defendants have a policy and practice of effectuating warrantless arrests without making an individualized flight risk determination.

*B. Arrests Without Identification of Authority or Reason*

66. Regulations also require immigration officers to (1) identify themselves “as an immigration officer who is authorized to execute an arrest”; and (2) “[s]tate that the

Julio Cesar Arnedo

PRO SE

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Karen Polo as Next Friend

person is under arrest and the reason for the arrest,” as soon as it is practical and safe to do so. 8 C.F.R. § 287.8(c)(2)(iii).

67. Defendants have a policy and practice of failing to identify themselves or explain the basis for an arrest. Agents often show up masked, without any visible badges or insignia indicating what agency they are with and have refused to identify themselves when asked. This has extended through the time of arrest, with individuals left in the dark about who they are interacting with or why they are under arrest.

*C. Defendants’ Pattern of Illegal Conduct Is Officially Sanctioned*

68. Defendants’ unlawful stops, arrests, denial of access to counsel and conditions at Moshannon Valley Processing Center are the predictable result of directives from top officials to agents and officers.

69. In January, the administration gave ICE field offices an arrest quota of 75 arrests a day.<sup>12</sup> As offices attempted to carry out such a mandate, workplace raids increased,<sup>13</sup> ICE check-ins became traps, and courthouse arrests surged.<sup>14</sup> Also, to help meet the quota, the administration granted agencies outside of DHS immigration enforcement powers.<sup>15</sup>

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<sup>12</sup> Nick Miroff & Maria Sacchetti, Trump Officials Issue Quotas to ICE Officers to Ramp Up Arrests, The Washington Post (last updated Jan. 26, 2025), <https://www.washingtonpost.com/immigration/2025/01/26/ice-arrests-raids-trump-quota/>.

<sup>13</sup> Marianne LeVine, et al., ICE is Arresting Migrants in Worksite Raids. Employers are Largely Escaping Charges, The Washington Post (June 30, 2025), <https://www.washingtonpost.com/immigration/2025/06/30/ice-raids-arrests-workers-companies/> (noting an April announcement by ICE officials that the agency had arrested more than 1,000 workers during Trump’s first 100 days and collecting stories of workplace raids across the country); Mark Moran, ICE Detains More than 530 People in Workplace ‘Raids’ in U.S. Northeast, United Press International (Jan. 23, 2025), <https://www.upi.com/Top-News/US/2025/01/23/ice-details-538-ice-workplace-raids/7811737692376/>.

<sup>14</sup> Julia Ainsley, Trump admin tells immigration judges to dismiss cases in tactic to speed up arrests, NBC News (June 11, 2025), <https://www.nbcnews.com/politics/national-security/trump-admin-tells-immigration-judges-dismiss-cases-tactic-speed-arrest-rcna212138>; Luis Ferré-Sadurní, Inside a Courthouse, Chaos and Tears as Trump Accelerates Deportations, N.Y. Times (June 12, 2025),

<sup>15</sup> Press Release, DHS, Statement from a DHS Spokesperson on Directive Expanding Immigration Law Enforcement to Some Department of Justice Officials (Jan. 23, 2025), <https://www.dhs.gov/news/2025/01/23/statement-dhs-spokespersondirective-expanding-immigration-law-enforcement>.

Julio Cesar Arnedo

PRO SE

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Karen Polo as Next Friend

70. Meanwhile, the administration began systematically dismantling internal accountability mechanisms and restraints on immigration agents' and officers' conduct. The administration shut down multiple oversight agencies.<sup>16</sup> Investigations were closed. Officers no longer had to abide by previous enforcement priorities.<sup>17</sup> Long-standing guidance restricting enforcement operations in sensitive locations—schools, hospitals, places of worship and public demonstrations—was rescinded.<sup>18</sup>

71. But these changes were not enough, according to the administration. In late May, Deputy Chief of Staff Stephen Miller summoned 25 ERO Field Office Directors and 25 HSI Special Agents to a meeting to demand that “everybody” be targeted.<sup>19</sup>

72. Under Miller’s directive, agents no longer needed to develop vetted target lists of individuals suspected of being in the United States unlawfully. ICE agents were instructed in an email to and aggressively “push the envelope,” including by pursuing “collaterals”—individuals that by definition would not have warrants.<sup>20</sup> As another e-mail put it: “If it involves handcuffs on wrists, it’s probably worth pursuing.”<sup>21</sup>

73. The administration set a new arrest quota of 3,000 arrests per day and reportedly threatened job consequences if officials failed to meet arrest quota.<sup>22</sup>

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<sup>16</sup> Nicolae Viorel Butler, Court Forces DHS to Preserve Immigrant Rights Offices, Migrant Insider (May 27, 2025), [https://migrantinsider.com/p/court-forces-dhs-to-preserve-immigrant?utm\\_source=CLINIC%2BMail&utm\\_campaign=f9e1ee6428-tips-6-2-25&utm\\_medium=email&utm\\_term=0\\_663ab9ab77-284225192](https://migrantinsider.com/p/court-forces-dhs-to-preserve-immigrant?utm_source=CLINIC%2BMail&utm_campaign=f9e1ee6428-tips-6-2-25&utm_medium=email&utm_term=0_663ab9ab77-284225192)

<sup>17</sup> Press Release, DHS, Statement from a DHS Spokesperson on Directives Expanding Law Enforcement and Ending the Abuse of Humanitarian Parole (Jan. 21, 2025), <https://www.dhs.gov/news/2025/01/21/statement-dhs-spokesperson-directives-expanding-law-enforcement-and-ending-abuse>.

<sup>18</sup> Marisa Kabas, ICE agents get green light to make unjustified warrantless arrests, The Handbasket (June 12, 2025), <https://www.thehandbasket.co/p/ice-warrantless-arrests-castanon-nava>.

<sup>19</sup> Stuard Anderson, Stephen Miller’s Order Likely Sparked Immigration Raids and Protests, Forbes, Jun. 9, 2025, <https://www.forbes.com/sites/stuardanderson/2025/06/09/stephen-millers-order-likely-sparked-immigration-arrests-and-protests/>.

<sup>20</sup> José Olivares, US immigration officers ordered to arrest more people even without warrants, The Guardian (June 4, 2025), <https://www.theguardian.com/us-news/2025/jun/04/immigration-officials-increased-detentions-collateral-arrests>.

<sup>21</sup> *Id.*

<sup>22</sup> Elizabeth Findell, et al., *supra* note 2; Julia Ainsley, et al., A sweeping new ICE operation shows how Trump’s focus on immigration is reshaping federal law enforcement, NBC News (June 4, 2025),

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74. The overriding message to agents and officers carrying out immigration operations on the ground was to prioritize arrest numbers, regardless of the law. Agents and officers were granted sweeping discretion to achieve this goal.

***D. Defendants' Illegal Conduct Will Continue if Not Enjoined***

75. The federal government has repeatedly made clear its intent to continue its operations and unlawful stops, arrests, and detentions. Defendants have been candid about their determination to continue pursuing these unlawful policies and practices, unless this Court enjoins them from doing so.

76. While immigration enforcement may be done lawfully, these statements demonstrate a commitment to continue operations at any cost, including at the expense of individuals' constitutional and legal rights. Plaintiffs have already been harmed, and they face a reasonable likelihood of continuing harm, as a result of Defendants' unlawful policies and practices described herein.

77. Plaintiffs have no plain, adequate, or complete remedy at law to address the wrongs described herein. Injunctive and declaratory relief is necessary to redress their ongoing injuries.

**CLAIMS FOR RELIEF**

**COUNT ONE**

**VIOLATION OF THE DUE PROCESS CLAUSE OF THE FIFTH AMENDMENT TO THE UNITED STATES CONSTITUTION PROCEDURAL DUE PROCESS**

78. The allegations in the above paragraphs are realleged and incorporated herein.

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79. Petitioner is being detained without cause and in violation of his/her Constitutional right to Due Process under the Fifth Amendment.
80. The Procedural Due Process Clause of the Fifth Amendment prohibits the government from depriving an individual of a protected interest without notice and an opportunity to be heard. Mathews v. Eldridge, 424 U.S. at 319, 333 (1976).
81. Respondents provided Petitioner with no notice or opportunity to be heard prior to arresting and detaining him/her.
82. Respondents have offered Petitioner no meaningful opportunity to be heard or challenge his/her detention since detaining him/her.
83. Petitioner's detention thereby deprives him/her of Petitioner's rights to Due Process under the Fifth Amendment of the United States Constitution.
84. Petitioner has no adequate remedy at law.

### COUNT TWO

#### **VIOLATION OF THE OF THE FIRST AND FIFTH AMENDMENTS TO THE UNITED STATES CONSTITUTION**

85. Petitioner realleges and incorporates by reference the paragraphs above.
86. U.S. citizens and noncitizens alike are guaranteed the right to due process under the Fifth
87. Amendment to the United States Constitution, which includes the rights to access courts and to participate in state court proceedings as a witness, party or complainant.
88. U.S. citizens and noncitizens alike are guaranteed the right of petition under the First Amendment to the U.S. Constitution, which includes the right to petition the Government for a redress of grievances. This right to petition includes the right to access courts and to participate in court proceedings as a witness, party or complainant.

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89. As a result of Respondents' unlawful arrest and detention of Petitioner, his/her rights were violated, and he has and continues to suffer prejudice.

90. Petitioner has no adequate remedy at law.

**COUNT THREE**

**RELEASE ON BAIL PENDING ADJUDICATION**

91. Petitioner realleges and incorporates by reference the paragraphs above.

92. This Court has the "inherent authority" to grant bail to habeas petitioners like Julio Cesar Arnedo. See Vega v. United States, 514 F. Supp. 2d 767, 770 (W.D. Pa. 2007) (citing Johnston v. Marsh, 227 F.2d 528, 531 (3d Cir.1955)); see also Mapp v. Reno, 241 F.3d 221, 230 (2d Cir. 2001).

93. Bail pending habeas is appropriate when a petitioner raises "substantial constitutional claims upon which he has a high probability of success, and also when extraordinary or exceptional circumstances exist which make the grant of bail necessary to make the habeas remedy effective." Landano v. Rafferty, 970 F.2d 1230, 1239 (3d Cir. 1992).

94. Petitioner meets this standard here. This petition raises constitutional claims on which he has a high probability of success. And Petitioner's immediate release is necessary to make this remedy effective. As long as Petitioner remains detained, his physical and mental health is at continued, serious risk, and his ability to litigate his asylum and immigration claims is jeopardized.

**COUNT FOUR:**

**VIOLATION OF THE INA, REGULATIONS THEREUNDER, AND THE FIFTH AMENDMENT'S DUE PROCESS CLAUSE**

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95. Petitioner realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.
96. Respondents presumed basis for detaining Petitioner is unknown.
97. Under the terms of the INA and the governing regulations, Petitioner's detention is unlawful.

**COUNT # FIVE:**

**VIOLATION OF 8 U.S.C. § 1357(A)(2) WARRANTLESS ARRESTS WITHOUT PROBABLE CAUSE OF FLIGHT RISK**

98. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.
99. 8 U.S.C. § 1357(a)(2) requires that arrests without a warrant be accompanied by "reason to believe" that an individual is "likely to escape before a warrant can be obtained for [their] arrest."
100. Respondents have a policy, pattern, and practice of making arrests without any warrant without making an individualized determination of flight risk. They have no mechanism for ensuring compliance with the statutory limits of agents' and officers' warrantless arrest authority and do not provide guidance to agents and officers on how to make an individualized determination of likelihood of escape. Respondents permit agents and officers to make warrantless arrests carte blanche in violation of law.
101. Respondents' policy, pattern, and/or practice of making warrantless arrests without the required individualized flight risk analysis is "final agency action" that is "in excess of statutory jurisdiction, authority, or limitations" under 8 U.S.C. § 1357(a)(2). 5 U.S.C. §§ 704, 706(2)(C).

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102. Separate from the APA, Respondents' policy, pattern, and practice of making warrantless arrests without the required individualized flight risk analysis is ultra vires.

**COUNT # SIX:**

**VIOLATION OF FOURTH AMENDMENT: UNREASONABLE SEIZURES ON BEHALF OF THE STOP/ARREST PETITIONER AND THE SUSPICIONLESS STOP CLASS AGAINST ALL RESPONDENTS**

103. Petitioner repeat, re-allege, and incorporate by reference each and every allegation in the preceding paragraphs as if fully set forth herein.
104. Except at the border and its functional equivalents, the Fourth Amendment prohibits Respondents from conducting a stop to question a person without reasonable suspicion that a person is a noncitizen unlawfully in the United States.
105. "A person's mere propinquity to others independently suspected of [unlawful] activity does not, without more, give rise to probable cause to search [or seize] that person." Perez Cruz v. Barr, 926 F.3d 1128, 1138 (9th Cir. 2019) (quotation omitted).  
"Reasonable suspicion' is no different." *Id.*
106. Respondents have a policy, pattern, and practice of stopping individuals without regard to reasonable suspicion that they are unlawfully in the United States.
107. As a part of Respondents' policy, pattern, and practice, when conducting stops, Respondents engage in a show of force so overwhelming that a reasonable person would not feel free to leave. As a matter of policy, pattern, and practice, Respondents do not evaluate the need for force or tailor the force they use to the circumstances of individual stops and arrests.

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108. Respondents' policy, pattern, and practice violates the Fourth Amendment to the U.S. Constitution.

**PRAYER FOR RELIEF**

Wherefore, Petitioner respectfully requests this Court to grant the following:

- 1) Assume jurisdiction over this matter;
- 2) Declare that Petitioner's detention violates the Due Process Clause of the Fifth
- 3) Amendment, the Administrative Procedure Act; Section 1225(b)(1)(A) of the
- 4) Immigration and Nationality Act; the First Amendment, and the Rehabilitation Act;
- 5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately.
- 6) Order that Petitioner not be transferred outside the Southern District of New York, except to be released;
- 7) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
- 8) Grant any further relief this Court deems just and proper.

Respectfully submitted,


Karen polo

Petitioner, *Pro Se*

Date: 1/7/26

 Arnedo

PRO SE

  
Karen Polo as Next Friend

**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

I am the Petitioner, Karen Polo, and submit this verification on my own behalf. I hereby swear under penalty of perjury that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 7<sup>th</sup> day of January, 2025.

Name: Karen Polo

Signature: *Karen Polo*

T A B A

U.S. Department of Homeland Security

Order of Release on Recognizance

File No: [REDACTED]
Date: November 29, 2021
Event No: [REDACTED]

Name: JULIO CESAR ARNEADO

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

[X] You must report for any hearing or interview as directed by the Department of Homeland Security or the Executive Office for Immigration Review.

[X] You must surrender for removal from the United States if so ordered.

[X] You must report in (writing) (person) to DEPORTATION OFFICER
26 Federal Plaza, 9th Floor, Suite 9-110 New York, NY 10278 on FEBRUARY 1 2022 at 08:00 AM

If you are allowed to report in writing, the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

[X] You must not change your place of residence without first securing written permission from the immigration officer listed above.

[X] You must not violate any local, State, or Federal laws or ordinances.

[X] You must assist the Department of Homeland Security in obtaining any necessary travel documents.

[ ] Other:

[ ] See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by the Department of Homeland Security.

[Handwritten Signature]

Sup Det & Dep Officer
DHS-ICE

Alien's Acknowledgment of Conditions of Release on Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the SPANISH language) and understand the conditions of my release as set forth in this order. I further understand that if I do not comply with these conditions, the Department of Homeland Security may revoke my release without further notice.

[Signature of Immigration Officer]
DHS-ICE
(Signature of Immigration Officer Serving Order)

[Signature of Alien]
(Signature of Alien)

DEC 03 2021
(Date)

Cancellation of Order

I hereby cancel this order of release because: [ ] The alien failed to comply with the conditions of release.

[ ] The alien was taken into custody for removal.

(Signature of Immigration Officer Canceling Order)

(Date)

DEPARTMENT OF HOMELAND SECURITY  
NOTICE TO APPEAR

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

FINS #: [REDACTED]

File No: [REDACTED]

DOB: [REDACTED]

Event No: [REDACTED]

In the Matter of:

JULIO CESAR ARNEADO

Respondent:

currently residing at:

[REDACTED] NEW YORK, 11368

+1 (917) -500-0887

(Number, street, city, state and ZIP code)

(Area code and phone number)

- You are an arriving alien.
- You are an alien present in the United States who has not been admitted or paroled.
- You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of VENEZUELA and a citizen of VENEZUELA ;
3. You arrived in the United States at or near EAGLE PASS, TX , on or about November 28, 2021 ;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- Section 235(b)(1) order was vacated pursuant to:  8CFR 208.30  8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

26 Federal Plaza 12 Floor Room 1237 New York NY US 10278

(Complete Address of Immigration Court, including Room Number, if any)

on a date to be set at a time to be to show why you should not be removed from the United States based on the

(Date)

(Time)

charge(s) set forth above.

GLENN BLIER

Acting Patrol Agent in Charge

(Signature and Title of Issuing Officer) (Sign in ink)

Date: November 29, 2021

Eagle Pass, Texas

(City and State)

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

**Allen 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](http://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.

**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) (Sign in Ink)

\_\_\_\_\_  
Border Patrol Agent

Date: 11/29/2021

\_\_\_\_\_  
(Signature and Title of Immigration Officer) (Sign in Ink)

**Certificate of Service**

This Notice To Appear was served on the respondent by me on November 29, 2021, in the following manner and in compliance with section 239(a)(1) of the Act.

- In person  by certified mail, returned receipt # \_\_\_\_\_ requested  by regular mail
- Attached is a credible fear worksheet.
- 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.

JOLPO ARNEDO  
(Signature of Respondent if Personally Served) (Sign in Ink)

COURTNEY REID, Border Patrol Agent  
(Signature and Title of officer) (Sign in Ink)

T A B B



T A B C

Uploaded on: 11/7/2022 at 6:11:31 p.m. (Eastern Standard Time) Base City: NYC

**NON-DETAINED**

Grace Sanchez Lemoine, Esq.  
Law Office of Michael S. Juarez, P.C.  
271 North Avenue, Suite 117  
New Rochelle, NY 10801  
914-233-1962

**UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
NEW YORK, NEW YORK**

-----X  
In the Matter of

**In Removal Proceedings**

**ARNEDO, JULIO CESAR**



Respondents.  
-----X

Immigration Judge: TBD


Next Hearing: TBD

**I-589 APPLICATION**

T A B D

T A B E

Official Website of the Department of Homeland Security



**U.S. Immigration and Customs Enforcement**

Report Crimes: Email or Call 1.866.DHS.2.I.C.E.

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### Facility Page

Detention Information For:

**JULIO CESAR ARNEDO**  
Country of Birth: Venezuela  
A-Number: 



Current Detention Facility:

ORANGE COUNTY CORRECTIONAL FACILITY  
110 WELLS FARM ROAD  
GOSHEN, NY 10924  
Visitor Information: (212) 883-3401

[MORE INFORMATION >](#)

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