

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ASLANBEK BASKAEV,

Petitioner,

v.

J.L. JAMISON, et al.,

Respondents.

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: Civil Action No. _____
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MOTION FOR TEMPORARY RESTRAINING ORDER

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned will move this Honorable Court, seeking a Temporary Restraining Order (“TRO”) in the form attached hereto and asking that this matter be set down for a hearing to convert those temporary restraints into a Preliminary Injunction pursuant to Fed. R. Civ. P. 65.

This Motion is supported by the accompanying Memorandum of Law in Support of Petitioner’s Motion for Temporary Restraining Order, and the concurrently filed Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241.

WHEREFORE, Petitioner Aslanbek Baskaev respectfully requests that this Court enter an Order:

- (i) Enjoining Respondents from moving or transferring Petitioner outside the Eastern District of Pennsylvania pending further order of this Court;
- (ii) Enjoining Respondents from detaining Petitioner pursuant to 8 U.S.C. § 1225(b)(2);
- (iii) Ordering Petitioner’s immediate release from Respondents’ custody, subject to any appropriate conditions of supervision deemed necessary and lawful; and

(iv) Granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/JONATHAN J. SOBEL, ESQUIRE

Attorney I.D. No. 76428

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

215 735 7535

215 735 7539

Mate89@aol.com

Attorney for Petitioner

Dated: February 19, 2026

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CERTIFICATE OF SERVICE

I, Jonathan J. Sobel, Esquire, attorney for the Petitioner, Aslanbek Baskaev, hereby certify that on this 19th day of February 2026, I served a true and correct copy of the following documents by electronic filing via the Court's CM/ECF system and by United States Postal Service first-class mail, postage prepaid, upon the parties named below:

MOTION FOR TEMPORARY RESTRAINING ORDER

**MEMORANDUM OF LAW IN SUPPORT OF PETITIONER'S
MOTION FOR TEMPORARY RESTRAINING ORDER**

PROPOSED ORDER

Served upon:

J.L. Jamison, Warden

Federal Detention Center, Philadelphia
700 Arch Street
Philadelphia, PA 19106

David O'Neill, Acting Field Office Director

ICE ERO Philadelphia Field Office
1600 Callowhill Street
Philadelphia, PA 19130

Todd Lyons, Acting Director

U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Kristi Noem, Secretary
U.S. Department of Homeland Security
245 Murray Lane
Washington, DC 20528

U.S. Department of Homeland Security
245 Murray Lane
Washington, DC 20528

Pamela Bondi, Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

U.S. Attorney's Office, Eastern District of PA
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106

Via ECF electronic filing and email to:
desiree.wilkins@usdoj.gov
anthony.stjoseph@usdoj.gov
susan.becker@usdoj.gov
gregory.david@usdoj.gov

Respectfully submitted,

/s/JONATHAN J. SOBEL, ESQUIRE

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1500 Walnut Street, Suite 900
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**MEMORANDUM OF LAW IN SUPPORT OF PETITIONER’S
MOTION FOR TEMPORARY RESTRAINING ORDER**

INTRODUCTION

Hundreds of federal district courts across every circuit have rejected the Government’s position that noncitizens residing in the interior of the United States are subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). Despite this overwhelming judicial consensus, the Government continues to apply its unlawful policy, detaining individuals like Petitioner without bond hearings in defiance of the statutory text, binding regulations, and the Constitution. Multiple judges of this Court have ruled squarely against the Government on this precise issue. *See, e.g., Murodov v. Jamison*, No. 2:26-cv-00594 (E.D. Pa. Feb. 13, 2026); *Cabreja Bueno v. O’Neill*, No. 2:26-cv-00304 (E.D. Pa. Feb. 13, 2026); *Mendez Sanchez v. Rose*, No. 2:26-cv-00820 (E.D. Pa. Feb. 13, 2026); *Demirel v. FDC Philadelphia*, No. 2:25-cv-05488 (E.D. Pa. Nov. 18, 2025).

Petitioner Aslanbek Baskaev is a 38-year-old citizen of Russia who has resided in the United States since December 23, 2021. He has a wife and two minor children, ages 12 and 11. He has no criminal record. He has complied with all conditions of his release for over four years, including regular ICE check-ins. On February 18, 2026, when Petitioner dutifully appeared for a

routine check-in at the ICE Philadelphia Field Office, he was seized and detained. He is now held at FDC Philadelphia without a bond hearing, based solely on the Government’s misapplication of § 1225(b)(2)(A) pursuant to *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), and the DHS July 8, 2025 policy directive.

This Court should grant the requested TRO, order Petitioner’s immediate release, and enjoin the Government from continuing to detain Petitioner under § 1225(b)(2).

I. PETITIONER’S DETENTION VIOLATES DUE PROCESS

The Fifth Amendment guarantees that “[n]o person shall . . . be deprived of life, liberty, or property, without due process of law.” U.S. Const. amend. V. This protection extends to all persons in the United States, regardless of immigration status. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). Whether Petitioner’s detention comports with due process is evaluated under the three-factor balancing test of *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976). All three factors weigh decisively in Petitioner’s favor.

a. Petitioner’s Private Interest

The liberty interest at stake is “the most elemental of liberty interests—the interest in being free from physical detention by one’s own government.” *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004). “Commitment for any purpose constitutes a significant deprivation of liberty that requires due process protection.” *Jones v. United States*, 463 U.S. 354, 361 (1983). “Procedural due process rules are meant to protect persons not from the deprivation, but from the mistaken or unjustified deprivation of life, liberty, or property.” *Carey v. Piphus*, 435 U.S. 247, 259 (1978).

Petitioner is separated from his wife and two minor children, ages 12 and 11, who depend on him for financial and emotional support. His detention disrupts his employment—his 2024

federal tax return reflects total income of \$37,765—and his family’s stability. These are precisely the harms that procedural due process is designed to prevent.

b. The Risk of an Erroneous Deprivation

The risk of erroneous deprivation is acute. The entire purpose of an individualized bond hearing under § 1226(a) is to prevent the Government from detaining individuals who pose no flight risk and no danger to the community. Petitioner has been denied any such hearing. Instead, the Government has applied a blanket policy—based on the BIA’s erroneous extension of § 1225(b)(2)(A) in *Yajure Hurtado*—that categorically denies bond to an entire class of individuals without any individualized assessment.

The Government itself previously determined that Petitioner could be safely released into the community. Petitioner was released over four years ago and has complied with all conditions since. The Government may not now retroactively apply § 1225(b)(2)(A) to strip him of bond eligibility without any changed circumstances. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 413 (2024) (courts must ensure agency “acts within” delegated authority).

c. The Government’s Interest

The Government’s recognized interests in immigration detention are preventing absconding and preventing danger to the community. *Zadvydas*, 533 U.S. at 690. Neither interest is served here. Petitioner has no criminal record. He has appeared for every ICE check-in for over four years. He was detained *because* he appeared for a check-in—the very act of compliance the Government demands. The Government has no legitimate interest in detaining a noncitizen who has demonstrated years of compliance, merely because it has adopted an unlawful statutory interpretation that hundreds of courts have rejected.

All three *Mathews* factors weigh heavily in support of Petitioner.

II. THE COURT SHOULD GRANT A TEMPORARY RESTRAINING ORDER

A temporary restraining order is warranted when: (1) the movant is likely to succeed on the merits; (2) the movant will suffer irreparable harm absent relief; (3) the balance of equities tips in the movant’s favor; and (4) the injunction is in the public interest. *Winter v. NRDC*, 555 U.S. 7, 20 (2008). In the Third Circuit, the first two are “gateway factors”: if both are met, the court considers the remaining two, applying a sliding scale. *Reilly v. City of Harrisburg*, 858 F.3d 173, 179 (3d Cir. 2017). All four factors favor Petitioner.

a. Likelihood of Success on the Merits

Petitioner is overwhelmingly likely to succeed on the merits. The legal question presented—whether § 1225(b)(2)(A) applies to noncitizens residing in the interior of the United States—has been answered decisively by hundreds of federal district courts. Only a handful have ruled otherwise.

As the Supreme Court explained in *Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018), § 1225 governs “applicants for admission,” while § 1226 governs “aliens already in the country pending the outcome of removal proceedings.” District courts have consistently defined “seeking admission” as “physically attempting to come into the United States, typically at a border or port of entry.” *Murodov v. Jamison*, No. 2:26-cv-00594 (E.D. Pa. Feb. 13, 2026) (citing *Vasquez-Rosario v. Noem*, No. 25-cv-7427, 2026 WL 196505, at *9 (E.D. Pa. Jan. 26, 2026) (collecting cases)).

Petitioner entered the United States over four years ago. He has been residing in the community, raising his family, and complying with all immigration requirements. He is not “seeking admission” at a port of entry. He is “already in the country.” *Jennings*, 583 U.S. at 289.

Accordingly, his detention is governed by § 1226(a), not § 1225(b)(2)(A), and he is entitled to a bond hearing.

Moreover, the agencies’ own 1997 interim rule confirms that noncitizens who entered without inspection “will be eligible for bond and bond redetermination.” 62 Fed. Reg. 10,323, 10,331. This regulation has never been rescinded or amended. The BIA’s contrary interpretation in *Yajure Hurtado* cannot override the agencies’ own binding regulation.

In addition, the Central District of California certified a nationwide class and granted partial summary judgment in *Maldonado Bautista v. Santacruz Jr.* (C.D. Cal. Nov. 25, 2025), declaring that noncitizens who entered without inspection are detained under § 1226(a), not § 1225(b)(2)(A), and are entitled to bond hearings. Petitioner’s likelihood of success is overwhelming.

b. Irreparable Harm

Unlawful detention is, by its very nature, irreparable. “Loss of liberty is perhaps the best example of irreparable harm.” *Matacua v. Frank*, 308 F. Supp. 3d 1019, 1025 (D. Minn. 2018). In the immigration context, “unlawful detention is sufficient irreparable injury.” *Arias Gudino v. Lowe*, 785 F. Supp. 3d 27, 46–47 (M.D. Pa. 2025). Separation from family members constitutes irreparable injury. *E.O.H.C. v. Barr*, 434 F. Supp. 3d 321, 340 (E.D. Pa. 2020).

Petitioner is unlawfully and unconstitutionally detained. He is separated from his wife and two minor children. His children, ages 12 and 11, are deprived of their father’s care, guidance, and financial support. Each day of unlawful detention inflicts irreparable harm that no monetary remedy can undo. Moreover, administrative remedies are futile: the same agencies that unlawfully detained Petitioner adjudicate any administrative remedies. Only this Court can provide meaningful relief.

c. Balance of Equities and Public Interest

When the Government is the opposing party, the balance-of-harms and public-interest factors merge. *Nken v. Holder*, 556 U.S. 418, 435 (2009). Both favor Petitioner.

The Government has no legitimate interest in enforcing an unconstitutional policy. “[A] state can have no interest in enforcing an unconstitutional law,” and “the public cannot be harmed by the enforcement of unconstitutional laws.” *Siembra Finca Carmen v. Sec’y*, 437 F. Supp. 3d 119, 137 (D.P.R. 2020). The public interest is served by “the protection of constitutional rights.” *Hope v. Warden York Cnty. Prison*, 972 F.3d 310, 332 (3d Cir. 2020). The public is “acutely interested” in seeing the Government follow the law. *Abrego Garcia v. Noem*, 777 F. Supp. 3d 519 (D. Md. 2025).

Respondents have no cognizable interest in detaining Petitioner under a statutory provision that does not apply to him. Granting the TRO imposes no burden on the Government—it merely requires compliance with the law. The equities overwhelmingly favor Petitioner.

CONCLUSION

For the foregoing reasons, Petitioner’s Motion for a Temporary Restraining Order should be granted. This Court should order Petitioner’s immediate release from unlawful detention and enjoin Respondents from detaining Petitioner under 8 U.S.C. § 1225(b)(2).

Respectfully submitted,

/s/JONATHAN J. SOBEL, ESQUIRE

Attorney I.D. No. 76428

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

215 735 7535

215 735 7539

Mate89@aol.com

Attorney for Petitioner

Date: 02/19/2026

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ORDER

AND NOW, this ____ day of _____, 2026, upon consideration of Petitioner's Motion for a Temporary Restraining Order, the accompanying Memorandum of Law, the Petition for Writ of Habeas Corpus filed pursuant to 28 U.S.C. § 2241, and good cause appearing, it is hereby ORDERED as follows:

1. Respondents are ENJOINED from removing or transferring Petitioner Aslanbek Baskaev from the Eastern District of Pennsylvania pending further order of this Court.
2. Respondents are ENJOINED from detaining Petitioner pursuant to 8 U.S.C. § 1225(b)(2).
3. Respondents shall IMMEDIATELY RELEASE Petitioner from custody at the Federal Detention Center, Philadelphia, subject to any appropriate conditions of supervision deemed necessary and lawful.

4. Respondents shall file any opposition to the request for preliminary injunctive relief on or before _____, 2026.

5. This Order shall remain in effect until further Order of the Court.

BY THE COURT:

J.

EXHIBIT A

**BOP Inmate Locator Printout
Confirming Detention at FDC Philadelphia**



Report Crimes: Email or Call 1-866-DHS-2-ICE

[Home](#)[Who We Are](#)[What We Do](#)[Newsroom](#)[Information Library](#)[Contact ICE](#)[< BACK TO RESULTS](#)

Facility Page

Detention Information For:

ASLANBEK BASKAEV**Country of Birth:** Russia**A-Number:**

Current Detention Facility:

Philadelphia Federal Detention Center

700 Arch Street

NA

Philadelphia, PA 19106

Visitor Information: (215) 521-4000[MORE INFORMATION >](#)

ERO Office Information

Family members and legal representatives may be able to obtain additional information about this individual's case by contacting this ERO office:

PHILADELPHIA, PA, DOCKET CONTROL
OFFICE

Phone Number: (215) 656-7164

[BACK TO SEARCH >](#)

Related Information

Helpful Info

Status of a Case

About the Detainee Locator

Brochure

ICE ERO Field Offices

ICE Detention Facilities

search

Privacy Notice

External Links

Bureau of Prisons Inmate
Locator



[DHS.gov](#)[USA.gov](#) [OIG](#) [Open FOIA Metrics](#) [No Site](#) [Site Policies & Plug-Ins](#)
[Gov](#) [Fear Map](#)
[Act](#)

EXHIBIT B

**Notice to Appear
Dated December 24, 2021**

**DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR**

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

Event No: XXXXXXXXXX

Subject ID : XXXXXXXXXX

SIGMA Event: XXXXXXXXXX

File No: XXXXXXXXXX

In the Matter of: **BASKAEV, ASLANBEK**

Respondent: **BASKAEV, Aslanbek**

currently residing at:

(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 Russia and a citizen of Russia;
3. On or about December 23, 2021, you applied for admission into the United States from Mexico at the Otay Mesa Port of Entry;
4. You are an immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document as required by the Immigration and Nationality Act.

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:

See Continuation Page Made a Part Hereof

☐ 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:
970 Broad Street, Room 1200, 12th Floor,
Newark, NJ, US 07102

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

on a date to be set at a time to be set to show why you should not be removed from the United States based on the
(Date) (Time) BAYARDO, CAR29877

charge(s) set forth above.

CBP OFFICER

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

Date: December 24, 2021

SAN YSIDRO, CALIFORNIA

(City and State)

Notice to Respondent

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 1-589, Application for Asylum and for Withholding of Removal. The Form 1-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/I-589. Failure to file the Form 1-589 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)

Date: December 24, 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 December 24, 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 RUSSIAN 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.

X 570
(Signature of Respondent if Personally Served) (Sign in ink)

BAYARDO, CAR29877
CBP OFFICER

(Signature and Title of officer) (Sign in ink)

Privacy Act Statement**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 OHS 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-sorns>. 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 OHS 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 OHS policy, the information you provide may be shared internally within OHS, 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.

U.S. Department of Homeland Security

Continuation Page for Form 1862

Alien's Name BASKAEV, ASLANBEK	File Number SIGMA Eve Event No:	Date December 24, 2021
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) (7) (A) (i) (I) of the Immigration and Nationality Act (Act), as amended, as an immigrant who, at the time of application for admission, is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act.		
Signature  BAYARDO, CAR29877	Title CBP OFFICER	

4 of 4 Pages

EXHIBIT C

**Form I-589 Receipt Notice
Application for Asylum and Withholding of Removal**

EXHIBIT D

Employment Authorization Document

EXHIBIT F

**Federal Income Tax Returns
2023 and 2024**