

Arabelis Brito  
Solow, Hartnett & Galvan, LLC  
1601 Walnut Street  
Philadelphia, PA  
Tel: (215) 330-5244  
[arabelis@shglawpa.com](mailto:arabelis@shglawpa.com)  
Attorney for the Petitioner

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

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**CRISTHIAN GEOVANNY QUINTERO SANCHEZ**

Petitioner,

Case No.:

v.

MICHAEL ROSE, in his official capacity as ICE Field Office Director; KRISTI NOEM, in her official capacity as Secretary of Homeland Security, and TODD M. LYONS, in his official capacity as Acting Director of Immigration and Customs Enforcement, Jamal Lawrence Jamison, Warden of the Philadelphia Federal Detention Center, and PAMELA BONDI, in her official capacity as Attorney General of the United States,

**VERIFIED WRIT FOR  
HABEAS CORPUS**

Respondents.

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**INTRODUCTION**

1. Petitioner Cristhian Geovanny Quintero Sanchez (hereinafter “Mr. Quintero” or “Petitioner”) is a native and citizen of Ecuador. Mr. Quintero was detained at the border on October 3, 2023, and issued an NTA on October 5, 2023, and has remained in the United States since that time.

2. On August 1, 2024, Mr. Quintero filed a timely Form I-589 Application for Asylum and Withholding of Removal.

3. On Wednesday February 18, 2026, Mr. Quintero was detained at a routine ICE Check-in appointment. Mr. Quintero had been regularly attending his ICE check-ins in good faith. However, Mr. Quintero was detained at his ICE check-in and has been detained at the Federal Detention Center (“FDC”) since.

4. On or about May 15, 2025, the Board of Immigration Appeals (the “Board”) has issued decisions, including *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), which said that anyone who is classified as an “an applicant for admission who is arrested and detained without a warrant while arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings us detained under section 235(b) of the Immigration and Nationality Act (“INA”) , 8 U.S.C. § 1225(b) (2018), and is ineligible for any subsequent release on bond under section 236(a) of the INA, 8 U.S.C. § 1226(a) (2018). Historically, these individuals were subject to the detention rules under 8 U.S.C. § 1226(a), which permitted them to apply for a bond in front of an immigration judge.

5. Mr. Quintero, who would otherwise be eligible to apply for a bond in front of an immigration judge, without this Court’s intervention by this petition, is now not eligible for any bond and must stay detained for the duration of his immigration court proceedings, including any appeal if the Immigration Court denies his application for relief from removal .

6. In addition, DHS violated Mr. Quintero’s due process rights under the Fifth Amendment of the U.S. Constitution by detaining him without conducting an individualized assessment to determine if his detention was warranted. Detention for those detained under 8 U.S.C. § 1226(a) is used to ensure that an individual will show up to court and is not a danger to persons or property. DHS has not demonstrated that Mr. Quintero, who did not require

detention before under either of those categories now poses a flight risk or is a danger to persons or property.

7. For these reasons, Mr. Quintero requests that the Court declare that DHS has violated his due process rights by detaining him under 8 U.S.C. § 1225(b) and declare that he is detained under 8 U.S.C. § 1226(a) and order his immediate release as DHS has violated his due process liberty rights, or, in the alternative, order that he receive a bond hearing with the burden on the government to prove by clear and convincing evidence that he is either a danger persons or property and/or a flight risk and that there is no combination of alternatives to detention that could mitigate those risks.

### **JURISDICTION**

8. This action arises under the Constitution of the United States, the APA, and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 et seq.

9. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

10. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.

### **VENUE**

11. Venue is proper because Petitioner is detained at the Philadelphia Federal Detention Center (“FDC”) in Philipsburg, Pennsylvania, which is within the jurisdiction of this District when this action was originally filed.

12. Venue is proper in this District because Respondents are officers, employees, or agencies of the United States, a substantial part of the events or omissions giving rise to Petitioner's claims occurred in this District, and Petitioner resides in this District. There is no real property involved in this action. 28 U.S.C. § 1391(e).

#### **REQUIREMENTS OF 28 U.S.C. § 2243**

13. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).

14. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

#### **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

15. To the extent required, Petitioner has exhausted his administrative remedies as required by law and his only remedy is by way of this judicial action. In addition, the administrative agency has already predetermined that Petitioner is not eligible for any relief through the agency. *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025). Therefore, any attempt to seek relief through the agency would be futile.

**PARTIES**

16. Petitioner is currently detained by the Department of Homeland Security. He was at the Federal Detention Center when he filed his habeas petition with this Court.

17. Respondent, Michael Rose, is the ICE Field Office Director for the ICE Philadelphia Field Office. He was the Petitioner's immediate custodian at the time this habeas was filed, and, upon information and belief, resides in the Eastern District of Pennsylvania.

18. Respondent Todd Lyons is sued in his official capacity as Acting Director of the United States Immigration and Customs Enforcement. In this capacity, Respondent Lyons oversees all detention of noncitizens held in ICE custody and is a legal custodian of petitioner with the authority to release him.

19. Respondent Kristi Noem is sued in her official capacity as Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, Respondent Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees ICE, the component agency responsible for Petitioner's detention and custody. Respondent Noem is a legal custodian of Petitioner.

20. Respondent, Jamal Lawrence Jamison, Warden of the Federal Detention Center in Philipsburg, Pennsylvania. Respondent is a legal custodian of Petitioner.

21. Respondent Pam Bondi is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review (EOIR), which administers the immigration courts and the Board of Immigration Appeals.

**STATEMENT OF FACTS**

22. Mr. Quintero is a native and citizen of Ecuador.

23. Mr. Quintero was detained at the border on or about October 3, 2023, and issued an NTA on October 5, 2023, and has remained in the United States since that time.

24. Mr. Quintero was detained on Wednesday February 18, 2026, at what he believed to be a routine ICE check-in. ICE detained Petitioner despite attending the check-in, in good faith.

25. Petitioner is currently being held in ICE's custody in the Eastern District of Pennsylvania at the Federal Detention Center or was at the FDC when this habeas petition was required.

26. Upon information and belief, Petitioner does not have a criminal record.

27. Upon information and belief, neither DHS nor its sub-agencies have made any claim that he is a danger to persons or property or a flight risk.

28. Upon information and belief, DHS did not perform an individual assessment prior to or contemporaneously with the decision to detain Petitioner.

**LEGAL BACKGROUND**

**PETITIONER'S DETENTION VIOLATES PETITIONER'S DUE PROCESS RIGHTS UNDER THE FIFTH AMENDMENT OF THE U.S. CONSTITUTION.**

**I. This Court has jurisdiction to hear this matter.**

29. As noted above, "Federal courts have jurisdiction to review habeas petition filed by immigration detainees who assert that they are 'in custody in violation of the Constitution or laws or treaties of the United States.'" *Artiga v. Genalo*, No. 25-CV-5208 (OEM), 2025

U.S. Dist. LEXIS 196847, at \*8 (E.D.N.Y. Oct. 5, 2025) quoting 28 U.S.C. § 2241(c)(3).

Therefore, this Court has jurisdiction to hear this matter.

## **II. Petitioner is not required to exhaust his administrative remedies.**

32. Petitioner is not required to exhaust his administrative remedies by seeking a bond or requesting discretionary parole.

33. While courts generally require exhaustion of administrative remedies before detainees may challenge their detention in court via a petition for a writ of habeas corpus, exhaustion is a prudential matter, not a statutory requirement. *Artiga*, 2025 U.S. Dist. LEXIS 196847, at \*8-9.

34. Further, the Board of Immigration Appeals (BIA) does not have jurisdiction to adjudicate constitutional issues. See *Qatanani v. Att’y Gen. of the US*, 144 F 4<sup>th</sup> 485, 500 (3d Cir. 2025). Therefore, any administrative proceedings would be futile because Petitioner raises a constitutional due process claim. *Qatanani*, 144 F 4<sup>th</sup> at 500.

35. Exhaustion of administrative remedies in certain circumstances, including when “(1) available remedies provide no genuine opportunity for adequate relief; (2) irreparable injury may occur without immediate judicial relief; (3) administrative appeal would be futile; and (4) in certain instances a plaintiff has raised a substantial constitutional question.” *Hechavarria v. Whitaker*, 358 F. Supp. 3d 227, 237 (W.D.N.Y. 2019) citing *Able v. U.S.*, 88 F.3d 1280, 1288 (2d Cir. 1996).

36. Here, two of these exceptions apply. First, any attempt to seek administrative remedy will be futile. In *Matter of Q. Li 29 I&N Dec. 66 (BIA 2025)*, the Board of Immigration Appeals (the “Board”) ruled for the first time that anyone who is classified as an “an applicant for

admission who is arrested and detained without a warrant while arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings as detained under section 235(b) of the Immigration and Nationality Act (“INA”), 8 U.S.C. § 1225(b) (2018), and is ineligible for any subsequent release on bond under section 236(a) of the INA, 8 U.S.C. § 1226(a) (2018). The consequence of this decision is that individuals who were historically eligible to apply for a bond before an immigration judge under 8 U.S.C. 1226(a) are now ineligible for an immigration judge-issued bond. Therefore, any attempt to seek release before an immigration judge would be futile.

37. Second, this petition raises a substantial constitutional question, *i.e.*, whether DHS has violated his due process rights under the U.S. Constitution in detaining him. Therefore, Petitioner should not be required to exhaust his administrative remedies.

### **III. PETITIONER IS DETAINED UNDER 8 U.S.C. § 1226(a).**

38. The next issue is the determination of which section of the Immigration and Nationality Act (“INA”) governs Petitioner’s detention.

39. Petitioner’s detention is governed by 8 U.S.C. § 1226(a).

#### **A. Background of 8 U.S.C. §§ 1225 and 1226.**

40. Two sections of Immigration and Nationality Act govern detention of non-citizens who have not received a final order of removal: 8 U.S.C. § 1225 and 8 U.S.C. § 1226.

41. Section 1225 of the Title 8 of the U.S. Code governs those who are considered “applicants for admission.” 8 U.S.C. § 1225(a)(1). This section states that “[a]n alien present in the United States who has not been admitted or who arrives in the United States. . . shall be deemed for purposes of this chapter an applicant for admission.”

42. Applicants for admission under 8 U.S.C. § 1225 are divided into two subsections: those covered by 8 U.S.C. § 1225(b)(1) and those covered by 8 U.S.C. § 1225(b)(2).

43. Section 1225(b)(1) of Title 8 of the U.S. Code generally applies to those noncitizens “initially determined to be inadmissible due to fraud, misrepresentation, or lack of valid documentation.” This section also applies to other aliens who receive a special designation by the Attorney General of the United States. 8 U.S.C. § 1225(b)(1)(A)(iii). These individuals are subject to what is commonly known as “expedited removal.”

44. Noncitizens who fall under 8 U.S.C. § 1225(b)(1) are subject to immediate removal unless they make a fear-based claim. Upon making that claim, if they pass a credible fear interview, they are put into removal proceedings where their fear-based application is considered. *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018). Noncitizens who either do not make a fear-based claim or do not make a credible fear-based claim are detained until removal. 8 U.S.C. §§ 1225(b)(1)(A)(ii), (B)(iii)(IV). Those who make a fear-based claim are detained while an immigration court considers the non-citizen’s claim. *Jennings*, 583 U.S. at 287 citing 8 U.S.C. § 1225(b)(1)(B)(ii).

45. The next category of individuals fall under 8 U.S.C. § 1225(b)(2). This is a general “catchall provision” that applies to all other applicants.” *J.U. v. Maldonado*, No. 25-CV-04836 (OEM), 2025 U.S. Dist. LEXIS 191630, at \*12 (E.D.N.Y. Sep. 29, 2025) quoting *Jennings*, 583 U.S. at 285. Those detained under this section are commonly known as “arriving aliens.”

46. Section 1225(b)(2)(A) provides that: “in the case of an alien who is an applicant for admission, if the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained” while the non-citizen is in removal proceedings under 8 U.S.C. § 1229a.

47. Detention is mandatory under 8 U.S.C. § 1225. But DHS may grant anyone who falls under 8 U.S.C. § 1225(b) temporary parole on a case-by-case and individualized basis. But when the purposes of the parole have been accomplished and/or the terms of that parole are concluded, the individual is returned to detention. *J.U.*, 2025 U.S. Dist. LEXIS 191630, at \*13-14. Those designated as “arriving aliens” are not eligible to apply for a bond from an immigration judge.

48. Historically, these individuals are noncitizens who go to a border checkpoint crossing and request entry.

49. The next category of individuals fall under 8 U.S.C. § 1226. Noncitizens detained under this section are then classified under one of two subsections here as well: 8 U.S.C. § 1226(a) and 8 U.S.C. § 1226(c).

50. “Section 1226(a) governs a separate non-mandatory detention scheme and provides for the ‘default rule’ for detaining and removing aliens ‘already present in the United States,’” Such as Mr. Quintero at the time of his routine ICE check-in. *J.U.*, 2025 U.S. Dist. LEXIS 191630, at \*14 quoting *Jennings*, 583 U.S. at 303. 51. This section provides that “on a warrant issued by the Attorney General, an alien may be arrested and detained pending a decision on whether the alien is to be removed from the United States.” 8 U.S.C. § 1226(a).

51. “While that decision is pending, the Attorney General may “continue to detain the arrested alien,” “release the alien on bond of at least \$1,500,” or “release the alien on conditional parole.” 8 U.S.C. § 1226(a)(1)-(2).

52. Section 1226(c) contains several “exceptions [to 8 U.S.C. § 1226(a)] for persons ‘who fall[ ] into one of the enumerated categories involving criminal offenses and terrorist

activities.” *J.U.*, 2025 U.S. Dist. LEXIS 191630, at \*14 quoting *Jennings*, 583 U.S. at 303. Detention is mandatory for those who fall under 8 U.S.C. § 1226(c).

53. But even those detained under 8 U.S.C. § 1226(c) can file a petition for a writ of habeas corpus for prolonged detention in violation of the Due Process Clause of the Fifth Amendment of the U.S. Constitution. A federal judge can then order that an immigration judge conduct a bond hearing with the burden on the government to show by clear and convincing evidence that the individual is a danger to persons or property or a flight risk and that no alternatives to detention exist that could mitigate that risk for the detention to continue. *See Black v. Dir. Thomas Decker*, 103 F.4th 133 (2d Cir. 2024); *Cantor v. Freden*, 761 F. Supp. 3d 630, 635- 41 (W.D.N.Y. 2025).

54. A Notice to Appear issued by the DHS can indicate the non-citizen's detention status. The NTA has specific boxes for those who fall under 8 U.S.C. § 1225(b)(1) and (b)(2). Those under 8 U.S.C. § 1225(b)(1) fall under the box that states, “Section 235(b)(1) order was vacated pursuant to: [ ] 8 CFR 208.30 [ ] 8 CFR 235.3(b)(5)(iv).” Those under 8 U.S.C. 1225(b)(2) fall under the box that states, “You are an arriving alien.” Finally, those who fall under 8 U.S.C. § 1226(a) fall under the box entitled “You are an alien present in the United States who has not been admitted or paroled.”

**B. Petitioner is detained pursuant to 8 U.S.C. § 1226(a).**

55. Petitioner is detained pursuant to 8 U.S.C. § 1226(a) for several reasons.

56. Petitioner has been charged as alien present without parole or admission under INA § 240.

57. Petitioner has never committed an aggravated felony that would subject him to mandatory detention, nor is he subject to mandatory detention provisions under the Laken Riley Act.

58. DHS makes no allegation that he ever was under expedited removal under 8 U.S.C. § 1225(b)(1), which is referred to generally as “expedited removal.”

59. In addition, Petitioner cannot be subject to mandatory detention under 8 U.S.C. § 1225(b)(2), he has already been in the United States several years, and is not presently “seeking admission” to the United States. *See Materano v. Arteta*, 2025 U.S. Dist. LEXIS 179608, at \*30- 31 (S.D.N.Y. Sep. 9, 2025) (explaining that the terms “arriving” and “seeking admission” are present-tense words and do not apply to an individuals who have been in the country for several years) citing *Benitez v. Francis*, 2025 U.S. Dist. LEXIS 157214, at \*21-23 (S.D.N.Y. Aug. 8, 2025) (also holding that expanding detention under 1225(b) would greatly expand mandatory detention beyond how DHS has traditionally treated this statute and that enforcing it this way would negate 8 U.S.C § 1226(a)).

60. To the extent that Respondent argues that Petitioner is detained under 8 U.S.C. § 1225(b) as an applicant for admission pursuant to *Matter of Q. Li*, 29 I&N Dec. 216 (BIA 2025), this argument fails.

61. In *Matter of Q. Li 29 I&N Dec. 66 (BIA 2025)*, the Board of Immigration Appeals (the “Board”) ruled for the first time that anyone who is classified as an “an applicant for admission who is arrested and detained without a warrant while arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings us detained under section 235(b) of the Immigration and Nationality Act (“INA”) , 8 U.S.C. § 1225(b) (2018), and is ineligible for any subsequent release on bond under section 236(a) of the INA,

8 U.S.C. § 1226(a) (2018). The consequence of this decision is that individuals who were historically eligible to apply for a bond before an immigration judge under 8 U.S.C. 1226(a) are now ineligible for an immigration judge-issued bond. The consequence of this decision is that individuals who were historically eligible to apply for a bond before an immigration judge under 8 U.S.C. 1226(a) are now ineligible for an immigration judge issued bond. But the Board's reversal of historical practice and newly revised interpretation of the detention statutes are not entitled to any deference. *See Loper Bright Ent. v. Raimondo*, 603 U.S. 369, 412-13 (2024). Numerous courts around the country have rejected the reasoning in *Yajure Hurtado* and held that those who have been in the United States longer than two years are classified under 8 U.S.C. § 1226(a) were, at minimum, entitled to a bond hearing before an immigration judge. *Artiga*, 2025 U.S. Dist. LEXIS 196847, at \*15-24; *Orellana v. Moniz*, Civil Action No. 25- cv-12664-PBS, 2025 U.S. Dist. LEXIS 196282, at \*13-14 (D. Mass. Oct. 3, 2025) (collecting cases).

62. In addition, Petitioner is not lawfully subject to mandatory detention under 8 U.S.C. § 1226(c), including because he has not been convicted of any crime that triggers such detention. *See Demore v. Kim*, 538 U.S. 510, 513-14, 531 (2003) (allowing mandatory detention under § 1226(c) for brief detention of persons convicted of certain crimes and who concede removability).

63. Accordingly, but for the challenged ruling in the BIA's *Q.Li* decision, Petitioner is subject to discretionary detention under 8 U.S.C. § 1226(a) based on Respondents' treatment of Petitioner and the plain text of the statute.

64. As a person detained under 8 U.S.C. § 1226(a), Petitioner must, upon his request, receive a custody redetermination hearing (colloquially called a “bond hearing”) with strong procedural protections. 8 C.F.R. 236.1(d) & 1003.19(a)-(f).

65. If the Court does not release Petitioner outright, on account of the egregious Fifth Amendment violation, Petitioner respectfully requests a bond hearing with the burden on the government to prove by clear and convincing evidence that he is not a danger to the public or property and not a flight risk and to likewise demonstrate by clear and convincing evidence that no alternatives to detention can mitigate the risk of flight or danger. *Cantor v. Freden*, 761 F. Supp. 3d 630, 635-41 (W.D.N.Y. 2025).

#### **IV. Petitioner’s Arrest and Detention Violates the Due Process Clause of the Fifth Amendment of the U.S. Constitution.**

69. The Due Process Clause of the Fifth Amendment of the U.S. Constitution prevents the “Government from depriving any person of ‘life, liberty or property, without due process of law.’” *J.U.*, 2025 U.S. Dist. LEXIS 191630, at \*27. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty [the Due Process Clause] protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

70. It is well-established that the Due Process clause “applies to all 'persons' within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S. at 693.

71. DHS arrested and detained Petitioner without an individualized assessment as to whether he is a flight risk and/or a danger to the community in violation of the Due Process Clause of the Fifth Amendment of the U.S. Constitution. Therefore, he petitions for his immediate release from DHS detention.

**CLAIMS FOR RELIEF**

**COUNT ONE**

**Violation of Fifth Amendment Right to Due Process  
(Unlawful Arrest and Detention)**

72. Petitioner alleges and incorporates all prior paragraphs above.
73. DHS detained Petitioner with no process, no showing of changed circumstances and no opportunity for Petitioner to respond to its decision to detain him.
74. This violates the Due Process Clause of the Fifth Amendment of the U.S. Constitution.
75. Petitioner's arrest and continued detention is therefore unlawful.
76. Therefore, Petitioner requests immediate release from this unlawful, unconstitutional custody.

**COUNT TWO**

**Violation of Fifth Amendment Right to Due Process  
(Failure to Provide Bond Hearing Under 8 U.S.C. § 1226(a))**

78. Petitioner alleges and incorporates all prior paragraphs above.
79. Because Petitioner is a person arrested inside the United States and is subject to detention, if at all, under 8 U.S.C. § 1226(a).
80. The Respondents will not provide Petitioner with a bond hearing as required by law.
81. Petitioner's continued detention is therefore unlawful.
82. Under the Due Process Clause of the Fifth Amendment to the United States Constitution, 8 U.S.C. § 1226(a), and 8 C.F.R. 236.1(d) & 1003.19(a)-(f), if the Court does not order Petitioner's immediate release, he is entitled to receive a bond hearing before an immigration judge with strong procedural protections.
83. Therefore, if the Court does not release Petitioner outright, Petitioner requests a court order that he is entitled to a bond hearing in front of an immigration judge with the

burden on the government to prove by clear and convincing evidence that he is not a danger to the public or property and not a flight risk and to likewise demonstrate by clear and convincing evidence that no alternatives to detention can mitigate the risk of flight or danger or on conditions the Court deems just and proper.

### **PRAYER FOR RELIEF**

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

1. Assume jurisdiction over this matter;
2. Order that Petitioner shall not be transferred outside the Commonwealth of Pennsylvania.
3. Adjudicate this petition pursuant to 28 U.S.C. § 1657 which requires that the Court expedite consideration of any action brought under 28 U.S.C. Chapter 153, which governs habeas petitions.
4. Declare that Petitioner's detention is unlawful.
5. Issue an order requiring Respondents to release Petitioner immediately, or, in the alternative, to provide Petitioner with a bond hearing where the burden is explicitly on the government to prove by clear and convincing evidence that he is not a danger to the public or property and not a flight risk and to likewise demonstrate by clear and convincing evidence that no alternatives to detention can mitigate the risk of flight or danger or on conditions the Court deems just and proper.
6. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
7. Grant any further relief this Court deems just and proper.

Dated: February 19, 2026

Philadelphia, PA

Respectfully submitted,

/s/ Arabelis Brito

Arabelis Brito

PA Bar #: 335889  
Solow, Hartnett & Galvan, LLC  
1601 Walnut St, Suite 1200  
Philadelphia, PA 19102  
Tel: (215) 330-5244  
[arabelis@shglawpa.com](mailto:arabelis@shglawpa.com)

*Attorney for Petitioner*

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

I represent Petitioner, Cristhian Geovanny Quintero Sanchez, and submit this verification on his behalf. I hereby verify 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 19<sup>th</sup>Day of February, 2026.

s/ Arabelis Brito

Arabelis Brito

PA Bar #: 335889

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

Place of Accident, Incident, or Transaction: Philadelphia, PA

RELATED CASE IF ANY: Case Number: Judge:

- 1. Does this case involve property included in an earlier numbered suit? Yes
2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? Yes
3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? Yes
4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? Yes
5. Is this case related to an earlier numbered suit even though none of the above categories apply? Yes

I certify that, to the best of my knowledge and belief, the within case is / is not related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Wage and Hour Class Action/Collective Action
6. Patent
7. Copyright/Trademark
8. Employment
9. Labor-Management Relations
10. Civil Rights
11. Habeas Corpus
12. Securities Cases
13. Social Security Review Cases
14. Qui Tam Cases
15. Cases Seeking Systemic Relief \*see certification below\*
16. All Other Federal Question Cases. (Please specify):

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify):
7. Products Liability
8. All Other Diversity Cases: (Please specify):

I certify that, to the best of my knowledge and belief, that the remedy sought in this case does / does not have implications beyond the parties before the court and does / does not seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of \$150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Cristhian Geovanny Quintero Sanchez

(b) County of Residence of First Listed Plaintiff Philadelphia (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) SHG Immigration, 1601 Walnut St, Suite 1200, Philadelphia, PA 19102

DEFENDANTS

Michael Rose, et. al.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question, 4 Diversity

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF, DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Real Estate, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 USC 2241

Brief description of cause: Writ of Habeas Corpus

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE DOCKET NUMBER

DATE 2/19/2026 SIGNATURE OF ATTORNEY OF RECORD s/ Arabelis Brito

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**  
**CASE MANAGEMENT TRACK DESIGNATION FORM**

v. : CIVIL ACTION  
: :  
: :  
: :  
: :  
: : NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. (✓)
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ( )

<u>2/19/26</u>	<u>Arabelis Brito</u>	<u>Cristhian Geovanny Quintan Sanchez</u>
Date	Attorney-at-law	Attorney for
<u>215-330-5244</u>	<u>267-513-0599</u>	<u>arabelis@shglawpa.com</u>
Telephone	FAX Number	E-Mail Address

(Civ. 660) 10/02

**Civil Justice Expense and Delay Reduction Plan  
Section 1:03 - Assignment to a Management Track**

- (a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.
- (b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management or Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.
- (c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.
- (d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.
- (e) Nothing in this Plan is intended to supersede Local Civil Rules 40.1 and 72.1, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS  
(See §1.02 (e) Management Track Definitions of the  
Civil Justice Expense and Delay Reduction Plan)**

Special Management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such cases as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions or potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.

Arabelis Brito  
Solow, Hartnett & Galvan, LLC  
1601 Walnut Street  
Philadelphia, PA  
Tel: (215) 330-5244  
[arabelis@shglawpa.com](mailto:arabelis@shglawpa.com)  
Attorney for the Petitioner

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

**CRISTHIAN GEOVANNY QUINTERO SANCHEZ**

Petitioner,

Case No.:

v.

MICHAEL ROSE, in his official capacity as  
ICE Field Office Director; KRISTI NOEM, in  
her official capacity as Secretary of Homeland  
Security, and TODD M. LYONS, in his official  
capacity as Acting Director of Immigration and  
Customs Enforcement, Jamal Lawrence Jamison, Warden  
of the Philadelphia Federal Detention Center, and  
PAMELA BONDI, in her official capacity as  
Attorney General of the United States,

**VERIFIED WRIT FOR  
HABEAS CORPUS**

Respondents.

---

**EXHIBITS**

- A. NOTICE TO APPEAR**
- B. ICE DETAINEE LOCATOR INDICATING PETITIONER IS CURRENTLY  
DETAINED AT FEDERAL DETENTION CENTER**

# EXHIBIT A

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] EV [REDACTED]

In the Matter of:  
Respondent: CRISTHIAN GEOVANNY QUINTERO SANCHEZ currently residing at:

[REDACTED ADDRESS]

(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; *AA*
2. You are a native of ECUADOR and a citizen of ECUADOR; *AA*
3. You arrived in the United States at or near LUKEVILLE, AZ, on or about October 3, 2023; *A*
4. You were not then admitted or paroled after inspection by an Immigration Officer. *A*

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:

900 MARKET STREET, SUITE 504 PHILADELPHIA PA 19107

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

on January 16, 2025 at 08:30 AM to show why you should not be removed from the United States based on the charge(s) set forth above.

Acting/Patrol Agent in Charge

DAVID C VANTREPOL JR  
Date: 2023.10.05.08:37 -07:00  
0267924268.CRP

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

Date: October 05, 2023

LUCKSON, ARIZONA

(City and State)

EOIR - 1 CI 3

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 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.

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: \_\_\_\_\_

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

Certificate of Service

This Notice To Appear was served on the respondent by me on October 05, 2023, 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.

\_\_\_\_\_  
(Signature of Respondent if Personally Served) (Sign in ink)

JACOB R. MASHBURN, BORDER
Date: 2023.10.05 03:30:39 -07:00
0358457281 CBP
\_\_\_\_\_  
(Signature and Title of officer) (Sign in ink)

EOIR - 2 CI 3

**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 1380), 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 (CARTER), 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.

2025 RELEASE UNDER E.O. 14176

# EXHIBIT B



Main Menu

## Search Results: 1

**CRISTHIAN GEOVANNY QUINTERO SANCHEZ**

**Country of Birth :** Ecuador

**A-Number:** [REDACTED]

**Status :** In ICE Custody

**State:** PA

**Current Detention Facility:** Philadelphia Federal Detention Center

*\* Click on the Detention Facility name to obtain facility contact information*

[BACK TO SEARCH >](#)

Related Information

- Helpful Info
- Status of a Case
- About the Detainee Locator
- Brochure
- ICE ERO Field Offices
- ICE Detention Facilities
- Privacy Notice

External Links

Privacy - Terms

Bureau of Prisons Inmate  
Locator



[DHS.gov](#)[USA.gov](#)[OIG](#)[OpenFOIA](#)[Metrics](#) [No Site](#) [Site](#)  
[Gov](#) [FearMap](#)[Policies](#)  
[Act](#) [& Plug-](#)  
[Ins](#)



Arabelis Brito  
Solow, Hartnett & Galvan, LLC  
1601 Walnut Street  
Philadelphia, PA  
Tel: (215) 330-5244  
[arabelis@shglawpa.com](mailto:arabelis@shglawpa.com)  
Attorney for the Petitioner

UNITED STATES DISTRICT COURT  
EASTERNDISTRICT OF PENNSYLVANIA

**CRISTHIAN GEOVANNY QUINTERO SANCHEZ**

Petitioner,

Case No.:

v.

MICHAEL ROSE, in his official capacity as  
ICE Field Office Director; KRISTI NOEM, in  
her official capacity as Secretary of Homeland  
Security, and TODD M. LYONS, in his official  
capacity as Acting Director of Immigration and  
Customs Enforcement, Jamal Lawrence Jamison, Warden  
of the Philadelphia Federal Detention Center, and  
PAMELA BONDI, in her official capacity as  
Attorney General of the United States,

**VERIFIED WRIT FOR  
HABEAS CORPUS**

Respondents.

---

**ORDER TO SHOW CAUSE AND PRELIMINARY INJUNCTION**

**AND NOW**, this \_\_\_\_ day of February, 2026, upon consideration of the Verified Petition for a Writ of Habeas Corpus and Motion for Preliminary Injunction filed by Petitioner CRISTHIAN GEOVANNY QUINTERO SANCHEZ and it appearing that the petition raises substantial questions concerning the legality of Petitioner's continued detention under 8 U.S.C. § 1225(b), and that immediate judicial review is necessary under 28 U.S.C. § 2243 and the Due Process Clause of the Fifth Amendment, it is hereby ORDERED as follows:

1. **ORDER TO SHOW CAUSE:** The Respondents shall show cause in writing on or before the \_\_\_\_\_ day of January, 2026 (within three (3) days) from the date of this Order, why the relief requested in the Petition should not be granted.

2. **RESPONSE DEADLINE:** Respondents' return shall be accompanied by a memorandum of law and all relevant portions of Petitioner's immigration and detention records.

3. **PRELIMINARY INJUNCTION / TEMPORARY STAY OF REMOVAL:** Pending resolution of this action or further order of the Court:

a. Respondents are temporarily enjoined from transferring Petitioner out of the jurisdiction of the Commonwealth of Pennsylvania; and

b. Respondents shall not remove Petitioner from the United States while this habeas corpus proceeding remains pending.

4. **PETITIONER'S REPLY:** Petitioner may file a reply memorandum within three (3) days of Respondents' filing of their return.

5. **SERVICE:** Petitioner's counsel shall promptly serve a copy of this Order, together with the Petition for Writ of Habeas Corpus and all supporting exhibits, upon the United States Attorney's Office for the Eastern District of Pennsylvania, by hand, electronic, or overnight service, and shall file proof of service with the Clerk of Court.

SO ORDERED.

---

HONORABLE JUDGE

United States District Judge

Arabelis Brito  
Solow, Hartnett & Galvan, LLC  
1601 Walnut Street  
Philadelphia, PA  
Tel: (215) 330-5244  
[arabelis@shglawpa.com](mailto:arabelis@shglawpa.com)  
Attorney for the Petitioner

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

---

**CRISTHIAN GEOVANNY QUINTERO SANCHEZ**

Petitioner,

Case No.:

v.

MICHAEL ROSE, in his official capacity as ICE Field Office Director; KRISTI NOEM, in her official capacity as Secretary of Homeland Security, and TODD M. LYONS, in his official capacity as Acting Director of Immigration and Customs Enforcement, Jamal Lawrence Jamison, Warden of the Philadelphia Federal Detention Center, and PAMELA BONDI, in her official capacity as Attorney General of the United States,

**VERIFIED WRIT FOR  
HABEAS CORPUS**

Respondents.

---

**PROOF OF SERVICE**

I, Arabelis Brito, hereby certify that in accordance with Federal Rule of Civil Procedure, I caused to be served Petitioner's Petition for writ of Habeas Corpus, civil cover sheet, exhibits, by electronic mail and via Federal Express overnight delivery, on the U.S. Attorney for the Eastern District of Pennsylvania, and on each Respondent in this action as follows:

**1. Respondent, Jamal Lawrence, Warden, (Via US Express Mail)**

Warden, Federal Detention Center (FDC) Philadelphia

700 Arch Street  
Philadelphia, PA 19107

**2. Michael Rose, Acting Field Office Director (Via US Express Mail)**

Immigration and Customs Enforcement  
Philadelphia Field Office  
114 North 8<sup>th</sup> Street  
Philadelphia, PA 19107

**3. Kristi Noem, Secretary of the Department of Homeland Security**

Kristi Noem  
Secretary of the Department of Homeland Security  
2707 Martin Luther King Jr. Ave, SE  
Washington DC, 20528

**4. Pamela J. Bondi, Attorney General of the United States**

Pamela J. Bondi  
Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Ave., N.W. Room 45-45  
Washington DC. 20530

**5. Todd Lyons, Acting Director (Via US Express Mail)**

500 12<sup>th</sup> Street  
Immigration and Customs Enforcement  
Washington, DC 20536

**Dated: February 19, 2026**

**/s/ Arabelis Brito, Esq.**

**Thomas Griffin, Esq.**

**PA Bar #: 335889**

**1601 Walnut St, Suite 1200**

**Philadelphia, PA 19102**

**Tel: (215) 330-5244**

**[arabelis@shglawpa.com](mailto:arabelis@shglawpa.com)**

**Attorney for Petitioner**