

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

HAFIZ AHMED,

Petitioner,

v.

Civil Action No. 26-1545

BRIAN MCSHANE, Acting Field Office
Director of Enforcement and Removal
Operations, Philadelphia Field Office
United States Immigration and Customs
Enforcement, *et al.*,

Respondents.

**RESPONSE IN OPPOSITION TO PETITION
FOR WRIT OF HABEAS CORPUS**

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Dated: March 12, 2026

I. INTRODUCTION

Petitioner seeks a writ of habeas corpus, challenging the authority of the Secretary of the U.S. Department of Homeland Security (DHS) to detain him under the Immigration and Nationality Act (INA), 8 U.S.C. § 1225(b)(2). This petition is distinguishable from the numerous petitions recently considered by this Court in the wake of the Board of Immigration Appeals' (BIA) decisions in *Matter of Hurtado*, 29 I & N Dec. 216 (BIA 2025), and *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025). *See e.g.*, *Cordero v. Rose*, No. 26-cv-534 (E.D. Pa. Jan. 29, 2026); *Cantu-Cortes v. O'Neill, et al.*, No. 25-cv-6338, 2025 WL 3171639, at *1-2 (E.D. Pa. Nov. 13, 2025). This Court—and every judge in this district that has considered the issue—has declined to endorse the government's statutory interpretation and application of *Hurtado* and *Q. Li*.

The cases cited above and by Petitioner involved **aliens detained under 8 U.S.C. § 1225(b)(2)(A)** because they are removable and present in the United States without inspection and admission or parole. But Petitioner is subject to mandatory detention under **8 U.S.C. § 1225(b)(1) [not 1225(b)(2)(A)]** because he was initially processed for **expedited removal** when he attempted to enter the United States without authorization. That Petitioner is no longer in expedited removal under § 1225 and is now in standard removal proceedings under § 1229a does not change the statutory basis for detention.¹ Petitioner is returned to his “detention status” when his parole ends.

¹ Multiple district courts in this jurisdiction (including this Court) have rejected this argument. *See e.g. Talabadze v. Rose, et al.*, No. 26-cv-360 (E.D. Pa Jan. 30, 2026) (Perez, J.); *Seminario-Marcos v. Jamison, et al.*, No. 26-cv-421 (E.D. Pa Feb. 6, 2026) (Kearney, J.); *Vazquez-Diaz v. Rose, et al*, No. 26-cv-342 (E.D. Pa Feb. 10, 2026) (Gallagher, J.); *Vargas- Quajada v. Jamison, et al*, 26-cv-914 (E.D. Pa. Feb. 17, 2026) (McHugh, J.); *Nawab Ali v. Jamison, et al.*, No. 26-cv-729 (E.D. Pa. Feb. 19, 2026) (Quinones-Alejandro, J.); *Zavala Ulloa v. Jamison, et al*, No. 26-cv-823 (E.D. Pa. Feb. 20, 2026) (Marston, J.); *Green v. Jamison, et al.*, No. 26-0773 (E.D. Pa. Feb. 26 2026) (Scott, J.).

DHS processed Petitioner for expedited removal pursuant to 8 U.S.C. § 1225(b)(1) after he entered the United States without inspection on August 3, 2024. ECF 1, Petition ¶ 1; Ex. 1 (2024 Form I-213). However, after Petitioner claimed a fear of return to his home country, DHS placed him into standard removal proceedings under 8 U.S.C. § 1229a and paroled him into the United States pursuant to 8 U.S.C. § 1182(d)(5) to facilitate this process. *See* Ex. 2 (2026 Form I-213) (stating that on August 10, 2024, an asylum officer found that the petitioner had credible fear of return to his home country, and that on August 29, 2024, petitioner was served with a notice to appear in removal proceedings). Ultimately, however, Petitioner’s credible-fear claim was rejected, *see* Ex. 3 (Notice to Appear (citing 8C.F.R. § 208.30)) and he returned to his detention status at the time of his parole—*i.e.*, mandatory detention under § 1225(b)(1)—during the remainder of his removal proceedings under § 1229a. Thus, Petitioner’s detention comports with the INA, the bond regulations, and the Constitution, and the Court should accordingly deny the petition for a writ of habeas corpus.

II. DETENTION FRAMEWORK UNDER THE INA

The INA provides a statutory scheme for the civil detention of aliens pending a decision during removal proceedings, as well as once a final order of removal has been entered. *See generally* 8 U.S.C. §§ 1225, 1226, 1231. The time and circumstances of entry, as well as the stage of the removal process, determines where an alien falls within this scheme and whether detention of the alien is discretionary or mandatory.

a. Applicants for Admission and Expedited Removal

An applicant for admission to the United States is defined as “[a]n alien present in the United States who has not been admitted or who arrives in the United States [] whether or not at a designated port of arrival. . . .” 8 U.S.C. § 1225(a)(1). As explained by

the Supreme Court, “an alien who tries to enter the country illegally is treated as an ‘applicant for admission,’ and an alien who is detained shortly after unlawful entry cannot be said to have ‘effected an entry’ into the United States.” *Dep’t of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 140 (2020). Put differently, an “alien who arrives at a ‘port of entry,’ *i.e.* a place where the alien may lawfully enter, must apply for admission. An alien [] who is caught trying to enter at some other spot is treated the same way.” *Id.* at 108. Such applicants for admission, “even those paroled elsewhere in the country for years pending removal—are ‘treated’ for due process purposes ‘as if stopped at the border.’” *Id.* at 139 (quoting *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 215 (1953)). Pursuant to 8 U.S.C. § 1225, immigration officials have discretion to place aliens arriving in the United States in either expedited removal proceedings under § 1225(b)(1) or full removal proceedings under 8 U.S.C. § 1229a. Under either approach, § 1225 authorizes detention of such individuals “throughout the completion of applicable proceedings and not just until the moment those proceedings begin.” *Jennings v. Rodriguez*, 583 U.S. 281, 302 (2018).

In 1996, Congress amended § 1225(b) to add “expedited removal” procedures for certain applicants for admission. Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104208, Tit. III, § 302(a), 110 Stat. 3009-579 (1996); *see also Thuraissigiam*, 591 U.S. at 109–11 (describing the expedited removal process). Section 1225(b)(1) now provides that an applicant for admission is subject to expedited removal if the applicant is: (i) inadmissible because he or she lacks valid documents or is inadmissible due to fraud; (ii) has not “been physically present in the United States continuously for the 2-year period immediately prior to the date of determination of inadmissibility”; or (iii) is among those whom the Secretary of DHS

has designated for expedited removal. For these individuals, once an immigration officer determines that they are inadmissible, the officer must “order the alien removed from the United States without further hearing.” 8 U.S.C. § 1225(b)(1)(A)(i); *Thuraissigiam*, 591 U.S. at 109.

b. Credible-Fear Determinations

If, however, the alien expresses a fear of persecution or torture in their home country, an asylum officer must determine whether the alien has a credible fear. *See* 8 U.S.C. §§ 1225(b)(1)(A)(ii) & (B); 8 C.F.R. §§ 208.30, 235.3(b)(4). If an asylum officer makes a positive finding of credible fear, the individual is placed into removal proceedings to pursue asylum under 8 U.S.C. § 1229a. *Id.*

As explained by the Supreme Court, “[a]n alien subject to expedited removal thus has an opportunity at three levels to obtain an asylum hearing, and the applicant will obtain one unless the asylum officer, a supervisor, and an immigration judge all find that the applicant has not asserted a credible fear.” *Thuraissigiam*, 591 U.S. at 110-11 (“As a practical matter, then, the great majority of asylum seekers who fall within the category subject to expedited removal do not receive expedited removal and are instead afforded the same procedural rights as other aliens.”). An individual subject to expedited removal under § 1225(b)(1), however, including an individual undergoing further review of their asylum claim, “is not entitled to immediate release” regardless of whether their asylum claim is reviewed fully or in an expedited manner. *Id.* at 111. *Jennings v. Rodriguez*, 583 U.S. 281, 302 (2018). Rather, § 1225(b)(1)(B)(iii)(IV) provides for mandatory detention of individuals during the credible fear review process and until removal from the United States. (“Any alien subject to the procedures under this clause

shall be detained pending a final determination of credible fear of persecution and, if found not to have such a fear, until removed.”) (emphasis added).

c. Parole for Applications for Admission

While an applicant for admission is not entitled to release or a bond hearing by statute or regulation, the Secretary, acting through Immigration and Customs Enforcement (ICE) and Customs and Border Protection (CBP), has discretion to release applicants for admission from custody on humanitarian parole. *See* 8 U.S.C. § 1182(d)(5). Such a parole is done “temporarily under such conditions as [the Secretary] may prescribe [and] only on a case-by-case basis for urgent humanitarian reasons or significant public benefit.” 8 U.S.C. §1182(d)(5)(A).

Parole is not an “admission” to the United States. 8 U.S.C. §§ 1101(a)(13)(B), 1182(d)(5)(A). As noted above, “aliens who arrive at ports of entry—even those *paroled elsewhere in the country for years pending removal*—are ‘treated’ for due process purposes ‘as if stopped at the border.’” *Thuraissigiam*, 591 U.S. at 139 (quoting *Mezei*, 345 U.S. at 215) (emphasis added); *see also Leng May Ma v. Barber*, 357 U.S. 185, 188–90 (1958). In other words, an applicant for admission paroled into the United States “remain[s] constructively detained at the border, *i.e.* legally unadmitted, while their status is being resolved by immigration officials.” *Ibragimov v. Gonzales*, 476 F.3d 125, 134 (2d Cir. 2007); *see also Duarte v. Mayorkas*, 27 F.4th 1044, 1059 (5th Cir. 2022) (“[A] paroled alien is legally equivalent to an alien that is held in custody at the border while their application for admission is processed.”).

ICE may terminate a parole under §1182(d)(5)(A) when, “in the opinion of the Secretary of Homeland Security, “the purposes of such parole . . . have been served.” 8 U.S.C. § 1182(d)(5)(A); *see also* 8 C.F.R. § 212.5(e)(2)(i). When a Notice to Appear

(NTA)—the charging document that initiates proceedings—is served on the parolee, this serves as written notice of termination of parole. *See Matter of Arambula-Bravo*, 28 I & N Dec. 388, 395 (BIA 2021) (“A charging document presumptively terminates parole because an intent to remove a noncitizen necessarily reflects a determination that the continued presence of that individual is no longer warranted.”). No pre-termination hearing is required. *See Ofosu v. McElroy*, 98 F.3d 694, 700 (2d Cir. 1996) (explaining that parole “may be ended without hearings or special forms.”); *Ahrens v. Rojas*, 292 F.2d 406, 410 (5th Cir. 1961) (“Neither the statute nor the regulation provides for a hearing on revocation of parole.”). Further, at the expiration of the time for which parole was authorized, “[p]arole shall be automatically terminated without written notice.” 8 C.F.R. § 212.5(e)(1)(ii).

d. Return to Custody After Parole Expiration or Termination

After parole expires or is terminated, “the alien shall forthwith return or be returned to the custody from which he was paroled and thereafter his case shall *continue to be dealt with in the same manner as that of any other applicant for admission* to the United States.” 8 U.S.C. § 1182(d)(5)(A) (emphasis added); 8 C.F.R. § 212.5(e)(2)(i) (explaining that after automatic termination, the alien “shall be restored to the status that he or she had at the time of parole”). Once parole is terminated, “[a]ny further inspection or hearing shall be conducted under section 235 [8 U.S.C. § 1225] or 240 [8 U.S.C. § 1229a] of the Act.” 8 C.F.R. § 212.5(e)(2)(i); *see Ahrens*, 292 F.2d at 410 (noting that after parole termination, “the plaintiff’s status was the same as if he had been stopped at the border.”). The grant of parole and its termination is committed to the broad discretion of the Secretary. *See Samirah v. O’Connell*, 335 F.3d 545, 549 (7th Cir. 2003) (holding DHS’s authority to “grant or revoke” parole under §

1182(d)(5)(A) is a matter of agency discretion barred from review by § 1252(a)(2)(B)(ii)); *Hassan v. Chertoff*, 593 F.3d 785, 789 (9th Cir. 2010) (same).

III. LEGAL STANDARD

A writ of habeas corpus is an “extraordinary remedy.” *Shinn v. Ramirez*, 596 U.S. 366, 377 (2022). The petitioner bears the burden of showing his confinement is unlawful. *Hawk v. Olson*, 326 U.S. 271, 279 (1945); accord *Cullen v. Pinholster*, 563 U.S. 170, 181 (2011) (habeas petitioner “carries the burden of proof”); *see also* 28 U.S.C. § 2241.

Judicial review of immigration matters, including detention issues, is limited. *INS v. Aguirre-Aguirre*, 526 U.S. 415, 425 (1999); *Reno v. Am.-Arab Anti-Discrimination Comm. (AADC)*, 525 U.S. 471, 489–92 (1999); *Miller v. Albright*, 523 U.S. 420, 434 n.11 (1998); *Fiallo v. Bell*, 430 U.S. 787, 792 (1977); *Reno v. Flores*, 507 U.S. 292, 305 (1993); *Hampton v. Mow Sun Wong*, 426 U.S. 88, 101 n.21 (1976) (“[T]he power over aliens is of a political character and therefore subject only to narrow judicial review.”). The Supreme Court has “underscore[d] the limited scope of inquiry into immigration legislation,” and “has repeatedly emphasized that over no conceivable subject is the legislative power of Congress more complete than it is over the admission of aliens.” *Fiallo*, 430 U.S. at 792 (internal quotation omitted); *Mathews v. Diaz*, 426 U.S. 67, 79–82 (1976); *Galvan v. Press*, 347 U.S. 522, 531 (1954).

The plenary power of Congress and the Executive Branch over immigration necessarily encompasses immigration detention, because the authority to detain is elemental to the authority to deport and because public safety is at stake. *See Shaughnessy v. United States*, 345 U.S. 206, 210 (1953) (“Courts have long recognized the power to expel or exclude aliens as a fundamental sovereign attribute exercised by

the Government’s political departments largely immune from judicial control.”); *Carlson v. Landon*, 342 U.S. 524, 538 (1952) (“Detention is necessarily a part of this deportation procedure.”); *Demore v. Kim*, 538 U.S. 510, 531 (2003) (“Detention during removal proceedings is a constitutionally permissible part of that process.”); *Jennings v. Rodriguez*, 583 U.S. 281, 286 (2018) (“Congress has authorized immigration officials to detain some classes of aliens during the course of certain immigration proceedings. Detention during those proceedings gives immigration officials time to determine an alien’s status without running the risk of the alien’s either absconding or engaging in criminal activity before a final decision can be made.”).

Petitioner must make a strong showing to demonstrate that his continued detention violates the Constitution or laws of the United States. *See U.S. v. Five Gambling Devices*, 346 U.S. 441, 449 (1953) (“This Court does and should accord a strong presumption of constitutionality to Acts of Congress. This is not a mere polite gesture. It is a deference due to deliberate judgment by constitutional majorities of the two Houses of Congress that an Act is within their delegated power or is necessary and proper to execution of that power”).

IV. ARGUMENT

As discussed below, Petitioner’s detention is authorized by statute, regulation, and comports with the Constitution. As such, this Court should deny the petition for a writ of habeas corpus.

a. Petitioner’s Detention is Authorized by 8 U.S.C. § 1225(b)(1)

Petitioner’s argument that his detention violates the INA and accompanying regulations is without merit because ICE’s current detention of Petitioner is authorized and, indeed, mandated by statute. Petitioner attempted to enter the United States

without inspection in 2024 and was intercepted but not inspected, admitted, or paroled by an immigration officer at the time of that entry. *See* Ex. 1 (2024 Form I-213).

Petitioner was therefore an “applicant for admission” and was accordingly processed for expedited removal under § 1225(b)(1)(A)(i). *Id.*

i. Petitioner was properly processed for expedited removal

The regulations at 8 C.F.R. § 235.3(b)(2)(i) set forth a procedure that must be followed before removing an alien under the expedited removal process. Petitioner was not removed under expedited removal processing, however, because he expressed a fear of return to Bangladesh during his interview. *See* Ex. 1 (2024 Form I-213). The fact that Petitioner is no longer in expedited removal proceedings does not preclude continued detention under § 1225(b)(1). To the contrary, when Petitioner claimed a fear of returning to Bangladesh, he triggered the § 1225(b)(1)(B) process, which includes a referral to the United States Citizenship and Immigration Services (USCIS) for a credible fear interview and further (full removal) proceedings to consider Petitioner’s application for asylum. 8 U.S.C. § 1225(b)(1)(B); ECF 1-1, Ex A. Until his removal proceedings under § 1229a are complete, which includes adjudication of his application for asylum application, or until he withdraws his application for admission pursuant to 8 U.S.C. § 1225(a)(4), Petitioner remains in this process.

ii. Petitioner’s release on parole does not preclude detention under 8 U.S.C. § 1225(b)(1)

Importantly, ICE’s release of Petitioner on parole pursuant to 8 U.S.C. § 1182(d)(5) does not preclude detention under § 1225(b)(1)(B)(ii). Petitioner may try to argue that he is not subject to mandatory detention under § 1225(b)(1) because he has been paroled into the United States. *See* § 1225(b)(1)(A)(iii)(II) (applying the expedited

removal provisions to certain other aliens “who have not been admitted or paroled into the United States”). However, the Court should reject this argument because the DHS Secretary’s 2004 Expedited Removal Designation makes clear that this language applies only to certain categories of aliens who were admitted or paroled into the United States *following inspection by an immigration officer at a designated port-of-entry*. See Designating Aliens for Expedited Removal, 69 Fed. Reg. 48877 (Aug. 11, 2004) (emphasis added); *see also* 8 U.S.C. § 1225(b)(1)(A)(iii)(I) (allowing the DHS Secretary to designate certain aliens for expedited removal and clarifying that this designation “shall be in the sole and unreviewable discretion” of the DHS Secretary).

Importantly, ICE’s release of Petitioner on parole pursuant to 8 U.S.C. § 1182(d)(5) does not convert DHS’s detention authority from § 1225(b)(1) to § 1226 because, as noted above, parole “shall not be regarded as an admission of the alien.” *Id.* § 1182(d)(5)(A). Rather, Congress was very explicit: “when the purposes of such parole have been served[,] the alien shall forthwith return or *be returned to the custody from which he was paroled* and thereafter his case shall continue to be dealt with *in the same manner as that of any other applicant for admission* to the United States.” *Id.* (emphasis added). Regardless of the length of his parole, Petitioner remains “‘treated’ for due process purposes ‘as if stopped at the border.’” *Thuraissigiam*, 591 U.S. at 139–40 (noting that “even those paroled elsewhere in the country for years” “cannot be said to have ‘effected an entry’ and remain “on the threshold.”). Petitioner therefore remains subject to the same detention authority (§ 1225(b)(1)) until his claim for asylum is fully adjudicated and he is either granted asylum or removed. *See Jennings*, 583 U.S. at 302; *Thuraissigiam*, 591 U.S. at 111; 8 U.S.C. § 1225(b)(1)(B)(ii).

That Petitioner is properly detained under § 1225(b)(1) receives further support from the Attorney General’s decision in *Matter of M-S-*, 27 I&N Dec. 509 (A.G. 2019). In *M-S-*, the Attorney General overruled as wrongly decided an earlier Board of Immigration Appeals’ (BIA) case, *Matter of X-K-*, 23 I&N Dec. 731 (BIA 2005), in which the BIA held that aliens transferred to full proceedings after establishing a credible fear were eligible for bond. 27 I&N Dec. at 513–14. The Attorney General explained that, by its plain language, applicants for admission transferred to full removal proceedings after establishing a credible fear remain ineligible for bond. *Id.* at 515. Instead, an individual in this category of applicants for admission “must be detained until his removal proceedings conclude, unless he is granted parole.” *Id.* at 509.

iii. No written notice is required prior to revoking parole

If Petitioner argues that ICE improperly revoked his parole without first providing notice of such revocation, the Court should reject that argument. The regulations make clear that no written notice is required prior to terminating a prior discretionary parole decision under § 1182(d)(5)(A). *See* 8 C.F.R. § 212.5(e)(1)(ii) (explaining that parole *shall be automatically terminated without written notice . . . at the expiration of the time for which parole was authorized . . . in accordance with* 8 C.F.R. § 212.5(e)(2), *except that no written notice shall be required*) (emphasis added). Only when termination of parole is not automatic under § 212.5(e)(1)—in other words, when an alien has not departed the United States or the period of parole has not expired—is notice required under § 212.5(e)(2). *But see Talabadze v. Rose*, No. 26-cv-360 (E.D. Pa. Jan. 30, 2026) (Perez, J.) (finding notice required prior to granting parole); *Vasquez Diaz v. Rose*, No. 26-cv-342 (E.D. Pa. Feb. 10, 2026) (Gallagher, J.) (same).

Furthermore, the Court lacks jurisdiction to review a parole revocation decision under 8 U.S.C. § 1252(a)(2)(B), since it is plainly a discretionary “decision or action.” *Samirah* 335 F.3d at 549 (holding DHS’s authority to “grant or revoke” parole under § 1182(d)(5)(A) is a matter of agency discretion barred from review by § 1252(a)(2)(B)(ii)); *Hassan*, 593 F.3d at 789 (same). Moreover, to the extent Petitioner is alleging that revocation of parole requires a case-by-case analysis, the Court should reject this argument. While 8 U.S.C. § 1182(d)(5)(A) requires that *grants* of parole be made on a case-by-case basis, it contains no parallel language with respect to terminations, and the language of § 1182(d)(5)(A) makes clear that such a determination is left entirely to the “opinion” of the DHS Secretary.

iv. Petitioner is not detained under 8 U.S.C. § 1225(b)(2)

This Court is familiar with detentions under § 1225(b)(2) pursuant to the BIA’s decision in *Matter of Q. Li*, 29 I&N Dec. 66, and DHS’s new policy, but that is not the situation here. As discussed above, Petitioner was processed for expedited removal upon entry into the United States and was subsequently found to have a credible fear of return to Bangladesh, thus bringing him within the mandatory detention authority of § 1225(b)(1). Therefore, Petitioner is detained under § 1225(b)(1), not § 1225(b)(2). Because Petitioner is properly detained under § 1225(b)(1) and not eligible for a bond hearing, this Court should deny the petition for a writ of habeas corpus.

b. Petitioner’s Detention is Constitutional

Petitioner’s argument that his detention violates procedural due process also lacks merit. The Supreme Court has long recognized that “an alien seeking initial admission to the United States requests a privilege and has no constitutional rights regarding his application, for the power to admit or exclude aliens is a sovereign

prerogative.” *Landon v. Plasencia*, 459 U.S. 21, 32 (1982). Further, applicants for admission like Petitioner lack any constitutional due process rights with respect to admission aside from the rights provided by statute: “[w]hatever the procedure authorized by Congress is, it is due process as far as an alien denied entry is concerned,” *Mezei*, 345 U.S. at 212, and, “it is not within the province of any court, unless expressly authorized by law, to review [that] determination.” *United States ex. rel. Knauff v. Shaughnessy*, 338 U.S. 537, 543 (1950). *See also Thuraissigiam* 591 U.S. at 140 (“[T]he Due Process Clause provides nothing more.”).

The Supreme Court reaffirmed “[its] century-old rule regarding the due process rights of an alien seeking initial entry” in *Thuraissigiam*, explaining that an individual who illegally crosses the border—like Petitioner—is an applicant for admission and “has only those rights regarding admission that Congress has provided by statute.” 591 U.S. at 139–40. The *Thuraissigiam* Court explained that “[w]hile aliens who have established connections in this country have due process rights in deportation proceedings, the Court held long ago that Congress is entitled to set the conditions for an alien’s lawful entry into this country and that, as a result, an alien at the threshold of initial entry cannot claim any greater rights under the Due Process Clause.” *Id.* at 107.

“When an alien arrives at a port of entry—for example, an international airport—the alien is on U.S. soil, but the alien is not considered to have entered the country.” *Id.* at 139. The same “threshold” rule applies to individuals who are apprehended after trying “to enter the country illegally,” because by statute, such individuals are also defined as applicants for admission. *Id.* at 139–40. And all applicants for admission, “even those paroled elsewhere in the country for years pending removal,” “have no entitlement to procedural rights other than those afforded by statute.” *Id.* at 107, 139.

And the statute provides no more procedural protections than allowing an applicant for admission to seek relief from removal if he fears return to his home country, and to seek parole from the agency. *Id.* During that process, however, applicants for admission may be detained without a bond hearing pending admission or removal without running afoul of the Constitution. *Demore v. Kim*, 538 U.S. 510, 531 (2003)

Petitioner's recent detention pending his removal proceedings thus does not violate Due Process. *See, e.g., Zadvydas v. Davis*, 533 U.S. 678, 701 (2001) (detention less than six months presumed constitutional). The Third Circuit has recognized that there may come a time when mandatory civil detention without a bond hearing becomes unreasonable. *See German Santos v. Warden Pike Cnty. Corr. Facility*, 965 F.3d 203, 211 (3d Cir. 2020) (analyzing detention under § 1226(c)). However, at this time, Petitioner does not challenge the reasonableness of his detention under *German Santos*. Therefore, the Court should find that Petitioner's detention is constitutional and deny the petition for writ of habeas corpus.

V. CONCLUSION

For the foregoing reasons, Respondents respectfully request that the petition for writ of habeas corpus be denied.

Respectfully submitted,

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Dated: March 12, 2026

CERTIFICATE OF SERVICE

I certify that on this date, I filed the foregoing Response in Opposition to Petition for Writ of Habeas Corpus via the Court's CM/ECF System, thereby making it available for viewing and download for all parties to the case.

Dated: March 12, 2026

/s/ Peter Carr
PETER CARR
Assistant United States Attorney

U.S. Department of Homeland Security

Subject ID :

Record of Deportable/Inadmissible Alien

Family Name (CAPS) AHMED, HAFIZ		First	Middle	Sex M	Hair BLK	Eyes BRO	Cmpbkn MED
Country of Citizenship BANGLADESH	Passport Number and Country of Issue	File Number		Height 63	Weight 115	Occupation	
U.S. Address				Scars and Marks See Narrative			
Date, Place, Time, and Manner of Last Entry 08/03/2024 18:00, SLU, PWA (AFOOT)			Passenger Boarded at	F.B.I. Number ☐ Single ☐ Divorced ☐ Married ☐ Widower ☐ Separated			
Number, Street, City, Province (State) and Country of Permanent Residence				Method of Location/Apprehension PE			
Date of Birth [REDACTED]	Age: 39	Date of Action 08/04/2024	Location Code YUS	At/Near	Date/Hour 08/03/2024 18:33		
City, Province (State) and Country of Birth BANGLADESH		AR ☒	Form : (Type and No.) Lifted ☐ Not Lifted ☐	By JAMIL MUHAMMAD			
NIV Issuing Post and NIV Number		Social Security Account Name		Status at Entry		Status When Found	
Date Visa Issued		Social Security Number		Length of Time Illegally in U.S.			
Immigration Record NEGATIVE			Criminal Record				
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)				Number and Nationality of Minor Children None			
Father's Name, Nationality, and Address, if Known ABEDIN, JOYNAL NATIONALITY: BANGLADESH			Mother's Present and Maiden Names, Nationality, and Address, if Known BEGUM, RAZIA NATIONALITY: BANGLADESH				
Monies Due/Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? ☒ Yes ☐ No	Systems Checks See Narrative	Charge Code Words(s) See Narrative			
Name and Address of (Last)(Current) U.S. Employer		Type of Employment	Salary	Employed from/to Hr			
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)							
FIN: [REDACTED]		Left Index fingerprint		Right Index fingerprint			
							
FAMILY INFORMATION Father: ABEDIN, JOYNAL is a citizen of BANGLADESH. Mother: BEGUM, RAZIA is a citizen of BANGLADESH. Spouse: Subject is not married. Child: Subject does not have children or dependents.							
SCARS MARKS AND TATTOOS None Visible - None Visible ... (CONTINUED ON I-831)							
Alien has been advised of communication privileges _____ (Date/Initials)				EDGAR JIMENEZ-PEREZ Border Patrol Agent			
Distribution: Original to A file Copy to Sector				Received: (Subject and Documents) (Report of Interview) Officer: EDGAR JIMENEZ-PEREZ on: August 4, 2024 (time) Disposition: Expedited Removal - Per 212(F) Examining Officer: BERGQVIST, LUKAS			

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name AHMED, HAFIZ	File Number [REDACTED]	Date 08/03/2024
CURRENT CRIMINAL CHARGES ----- 08/03/2024 - 8 USC 1182 - ALIEN INADMISSIBILITY UNDER SECTION 212 CURRENT ADMINISTRATIVE CHARGES ----- 08/03/2024 - 212a7AiI - IMMIGRANT WITHOUT AN IMMIGRANT VISA RECORDS CHECKED ----- CIS checked on 08/04/2024 with Negative result. ABIS checked on 08/03/2024 with Negative result. EARM checked on 08/04/2024 with Negative result. NCIC checked on 08/04/2024 with Negative result. TECS checked on 08/04/2024 with Negative result. NGI checked on 08/03/2024 with Negative result. RECORD OF DEPORTABLE/EXCLUDABLE ALIEN: ----- IMMIGRATION HISTORY: See attached records. CRIMINAL HISTORY: See attached records. Pursuant to section 235(b)(1) of the Immigration and Nationality Act (Act), 8 U.S.C. 1225(b)(1)), the Department of Homeland Security has determined that you are inadmissible to the United States under section 212(a)(7)(A)(i)(I) of the Act, as amended, and therefore are subject to removal, in that: you are an immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act. ENCOUNTER: A Border Patrol Agent encountered this subject in the Yuma Border Patrol Sector Area of Responsibility. As per the field form, the subject admitted that they had unlawfully entered the United States of America from Mexico, at a time and place other than as designated by immigration officers of the United States of America. As per the field form, the subject was apprehended for illegally entering the United States. After determining that this subject was an alien who illegally entered the United States, the subject was arrested and transported to the Yuma, Arizona Border Patrol Station for further processing using the e3/IDENT and NGI systems. IMMIGRATION VIOLATION: At the Yuma Border Patrol Station, the subject stated being a citizen and national Bangladesh without the necessary legal documents to enter, pass through, or remain in the United States. The subject also admitted to illegally crossing the international boundary without being inspected by an Immigration Officer at a designated Port of Entry. CONSULAR NOTIFICATION: The subject was notified of their right to communicate with a Consular Officer from their country as per Article 36(1)(b) of the Vienna convention on Consular Relations. The subject indicated they understood this right but declined to speak with anyone at this time. The subject further stated having no credible fear if returned to their country of citizenship. DISPOSITION: The subject is being held under Service custody pending removal proceedings. Expedited Removal as per Section 235(b)(1)(A)(iii) of the INA. POINT OF CONTACT IN THE UNITED STATES:		
Signature EDGAR JIMENEZ-PEREZ	Title Border Patrol Agent	

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name AHMED, HAFIZ	File Number [REDACTED]	Date 08/03/2024
Name: Fahem Ahmed Phone #: [REDACTED] Address: [REDACTED] As per Presidential Proclamation, Securing the Border, pursuant to the Interim Final Rule, Securing the Border, 8 C.F.R.235.15 guidelines, AHMED, HAFIZ, was not issued an I 867A/B Sworn Statement. AHMED, HAFIZ will be removed at a time, place and in a manner consistent with removal proceedings for a citizen of his respective nation. OTHER IDENTIFYING NUMBERS ----- ALIEN- [REDACTED] Cedula [REDACTED] (BANGLADESH)		
Signature EDGAR JIMENEZ-PEREZ	Title Border Patrol Agent	

3 of 3 Pages

U.S. Department of Homeland Security

Subject ID : 401752023

Record of Deportable/Inadmissible Alien

Family Name (CAPS) AHMED, HAFIZ		First	Middle	Sex M	Hair BLK	Eyes BRO	Cmpbkn MED
Country of Citizenship BANGLADESH	Passport Number and Country of Issue	File Number		Height 63	Weight 115	Occupation UNR	
U.S. Address				Scars and Marks			
Date, Place, Time, and Manner of Last Entry 08/23/2024 Unknown Time, SLU,			Passenger Boarded at	F.B.I. Number ☒ Single ☐ Divorced ☐ Married ☐ Widower ☐ Separated			
Number, Street, City, Province (State) and Country of Permanent Residence				Method of Location/Apprehension NCA			
Date of Birth 	Age: 40	Date of Action 03/10/2026	Location Code PHI/PHI	At/Near See I-831		Date/Hour 03/10/2026 15:19	
City, Province (State) and Country of Birth BANGLADESH		AR ☒	Form : (Type and No.) Lifted ☐ Not Lifted ☐	By KIMBERLI PIERRE			
NIV Issuing Post and NIV Number		Social Security Account Name		Status at Entry		Status When Found	
Date Visa Issued		Social Security Number		Length of Time Illegally in U.S.			
Immigration Record NEGATIVE			Criminal Record				
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)				Number and Nationality of Minor Children None			
Father's Name, Nationality, and Address, if Known ABEDIN, JOYNAL NATIONALITY: BANGLADESH			Mother's Present and Maiden Names, Nationality, and Address, if Known BEGUM, RAZIA NATIONALITY: BANGLADESH				
Monies Due/Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? ☒ Yes ☐ No	Systems Checks See Narrative	Charge Code Words(s) See Narrative			
Name and Address of (Last)(Current) U.S. Employer		Type of Employment Unemployed or Retired	Salary Hr	Employed from/to			
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.) FIN: Left Index fingerprint Right Index fingerprint							
FAMILY INFORMATION ----- Father: ABEDIN, JOYNAL is a citizen of BANGLADESH. Mother: BEGUM, RAZIA is a citizen of BANGLADESH. Spouse: Subject is not married. Child: Subject does not have children or dependents.							
SUBJECT HEALTH STATUS ----- The subject claims good health. ...(CONTINUED ON I-831)							
Alien has been advised of communication privileges _____ (Date/Initials)				KIMBERLI PIERRE Deportation Officer			
Distribution:				Received: (Subject and Documents) (Report of Interview) Officer: KIMBERLI PIERRE on: March 10, 2026 (time) Disposition: Other Examining Officer: DEMURGUIONDO, ASD8132			

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name AHMED, HAFIZ	File Number [REDACTED] Event No: [REDACTED]	Date 03/10/2026
CURRENT ADMINISTRATIVE CHARGES ----- 03/10/2026 - 212a6Ai - ALIEN PRESENT WITHOUT ADMISSION OR PAROLE - (PWAs) 03/10/2026 - 212a7AiI - IMMIGRANT WITHOUT AN IMMIGRANT VISA RECORDS CHECKED ----- CIS checked on 03/10/2026 with Positive result. EARM checked on 03/10/2026 with Positive result. IAFIS checked on 03/10/2026 with Positive result. NCIC checked on 03/10/2026 with Negative result. TECS checked on 03/10/2026 with Positive result. ARRESTED AT/NEAR ----- [REDACTED] PENNSYLVANIA, 19107, UNITED STATES RECORD OF DEPORTABLE/EXCLUDABLE ALIEN: ----- AHMED, HAFIZ, is subject to President Donald Trump's Executive Order, titled "Protecting the American People Against Invasion," signed on January 20, 2025. Encounter: On March 10, 2026, AHMED, HAFIZ [REDACTED] a native and citizen of BANGLADESH, reported to the Immigration and Customs Enforcement (ICE) Enforcement and Removal Operations (ERO) Philadelphia Field Office for his scheduled check-in appointment. The Philadelphia Non-Detained Unit confirmed KABA's identity, alienage, and removability and served him a with a Notice to EOIR, Form I-830, charging him under Section 212a6Ai and 212a7AiI of the Immigration and Nationality Act (INA). Alienage & Removability: AHMED is a citizen of BANGLADESH and a national of BANGLADESH by virtue of birth, who entered the United States illegally without being admitted or paroled by an immigration officer. Numerous checks using databases with the Department of Homeland Security (DHS) and the Department of Justice (DOJ) show no pending appeals, waivers, or petitions. Family/ Derivative Citizenship: AHMED has not asserted any claim to United States citizenship, nor do any records indicate that he has obtained or derived such citizenship. Immigration History: The U.S. Border Patrol (USBP) encountered AHMED on August 3, 2024, near SAN LUIS, AZ while attempting to illegally enter the United States without inspection by an immigration officer at a time and place other than as designated by the Secretary of Homeland Security. On 08-04-2024, the Border Patrol served the subject with a Notice of Expedited Removal, Form I-860, and forwarded his credible fear packet to Asylum. On 08/10/2024 subject was taken into custody ELOY FED CTR FACILITY and claimed fear of removal to BANGLADESH. An Asylum Officer deemed that the subject established a credible fear of removal. On 08-29-2024, Asylum served the subject with a Notice to Appear, Form I-862, charging him under Section 212a7AiI and 212a6Ai of the INA. Criminal History:		
Signature KIMBERLI PIERRE	Title Deportation Officer	

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name AHMED, HAFIZ	File Number [REDACTED] Event No: [REDACTED]	Date 03/10/2026
AHMED has no previous criminal record and does not have any outstanding wants or warrants. Health & Humanitarian: AHMED denied any significant humanitarian concerns. AHMED made a 5-minute phone call to [REDACTED] AT 1 [REDACTED] AHMED accepted his right to speak with the BANGLADESH Consulate. Consular notifications are not mandatory. AHMED claimed no fear of removal to BANGLADESH. AHMED claims to have no medical concerns, does not require medication. AHMED claims to be married. AHMED claims to have no children. AHMED stated that he did not serve in the United States Military. Foreign Identity and Travel Documents: At the time of arrest, ERO was able to obtain AHMEDs foreign identity/travel document. No. [REDACTED] Disposition: ICE served AHMED with a Notice to EOIR, I-830E and a Warrant of Arrest, Form I-200. Subject's I-830 has been uploaded into ECAS. [REDACTED]		
Signature KIMBERLI PIERRE	Title Deportation Officer	

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name AHMED, HAFIZ	File Number [REDACTED] Event No: [REDACTED]	Date 03/10/2026
Subject is currently detained at FDC Philadelphia however, ICE intends to transfer subject to Moshannon Valley within 5-7 business days and case should be docketed with the court in Elizabeth. OTHER IDENTIFYING NUMBERS ----- ALIEN-[REDACTED] Cedula (Foreign ID) - [REDACTED] (BANGLADESH)		
Signature KIMBERLI PIERRE	Title Deportation Officer	

4 of 4 Pages

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

Subject to the Securing the Borders IFR

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

File No: [REDACTED]

In the Matter of:

Respondent: HAFIZ AHMED currently residing at:

[REDACTED]
(Number, street, city, state and ZIP code)

[REDACTED]
(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 Bangladesh and a citizen of BANGLADESH;
3. You entered the United States at an unknown location on or about August 3, 2024;
4. You did not then possess or present a valid immigrant visa, reentry permit, border crossing identification card, or other valid entry document;
5. 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:

Section 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.

Section 212(a)(6)(A)(i) of the Act, as amended, as an alien present in the United States without being admitted or paroled, or who has 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 ST, STE 504, PHILADELPHIA, PA, 19107

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

on 02/03/2026 at 01:00 PM to show why you should not be removed from the United States based on the
(Date) (Time)

charge(s) set forth above.



Supervisory Asylum Officer

(Signature and Title of Issuing Officer)

Date: 8/29/2024

Houston, TX

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

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

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

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

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

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

BENGALI

Request for Prompt Hearing

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

Before:

(Signature of Respondent)

Date:

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on 8/30/24, 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 Bengali 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)

(Signature and Title of officer)

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 DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

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

Disclosure:

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