

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

G.B.T.,

Petitioner,

v.

JOHN RIFE, ET AL.,

Respondents.

Civil Action No. 2:26-cv-01842

RESPONDENTS' OPPOSITION TO
PETITION FOR WRIT OF HABEAS CORPUS

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Dated: April 7, 2026

I. INTRODUCTION

Petitioner seeks a writ of habeas corpus, challenging the lawfulness of reporting requirements imposed by Immigration and Customs Enforcement (ICE) following his release from custody. Not content with release from custody during the pendency of his removal proceedings, and despite not having any lawful status in the United States, Petitioner now claims that ICE is prohibited from imposing *any* requirements upon him *at any time* during the pendency of his removal proceedings, unless those requirements are specifically enumerated in an immigration judge's order following a custody redetermination hearing.

This argument fails to set forth a cognizable claim for habeas corpus relief for two reasons. First, the reporting requirement set by ICE, given its minimally invasive nature, does not impose a significant restraint on Petitioner's liberty. Therefore, Petitioner is not presently in custody for purposes of habeas corpus. Second, the reporting requirement relates to an administrative function of ICE, not a custody condition within the purview of a custody redetermination hearing. Therefore, ICE's conduct does not violate the Immigration and Nationality Act (INA) or the accompanying regulations. For these reasons, the Court should deny the Petition.

II. FACTUAL AND PROCEDURAL HISTORY

Petitioner, a native and citizen of Nicaragua, entered the United States without authorization on or about September 2, 2022. Ex. A – Form I-213, Record of Deportable/Inadmissible Alien (dated Oct. 24, 2025). Following his unlawful entry,

ICE enrolled him in the Alternatives to Detention program and released him from custody. *Id.*; *see also* ECF 1, Ex. 5 p. 6 (listing enrollment date of September 5, 2022).

On October 24, 2025, ICE detained Petitioner at a scheduled reporting appointment and initiated removal proceedings through the issuance of a Notice to Appear (NTA), charging him as removable under 8 U.S.C. §§ 1182(a)(6)(A)(i) and 1182(a)(7)(A)(i)(I). *Id.*; *see also* Ex. B – Form I-200, Warrant for Arrest of Alien (dated Oct. 24, 2025). Petitioner requested review by an immigration judge of ICE's custody determination, and an immigration judge ordered his release from custody under a bond of \$7,000 on January 27, 2026. ECF 1, Ex. 2.

Given the recency of his release, and since his removal proceedings remained ongoing, ICE enrolled Petitioner into the ATD (Alternatives to Detention), Intensive Supervision Appearance Program (ISAP) on February 2, 2026. ECF 1 ¶ 7, Ex. 5. As part of his enrollment, ICE placed an ankle monitor on Petitioner and imposed certain reporting requirements and travel restrictions while his removal proceedings remained ongoing. *Id.*

On March 27, 2026, ICE removed Petitioner from ATD ISAP entirely, which resulted most significantly in removal of all types of electronic monitoring, including the ankle monitor, and any travel restrictions. ECF 12 p. 2. Now, while Petitioner's removal proceedings continue on the immigration court's non-detained docket, Petitioner must report to the ICE office once every six months to check-in through ICE's Compliance Assistance Reporting Terminal (CART)—a kiosk that allows for

automated rather than in-person check-ins with an ICE officer. *Id.*; Ex. C – CART General Information for Enrollees. Aside from this virtual check-in once every six months, Petitioner is not subject to any other monitoring, reporting, or restrictions.

III. LEGAL STANDARD

Petitioner seeks a writ of habeas corpus, which is an “extraordinary remedy.” *Shinn v. Ramirez*, 596 U.S. 366, 377 (2022). The 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”). Judicial review of immigration matters, including of detention issues, is limited. *I.N.S. v. Aguirre-Aguirre*, 526 U.S. 415, 425 (1999); *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.”).

Petitioner also seeks injunctive and declaratory relief, asking the Court to vacate ICE's use of ISAP.¹ "An injunction is a drastic and extraordinary remedy, which should not be granted as a matter of course." *Monsanto Co. v. Geertson Seed Farms*, 561 U.S. 139, 165 (2010). Instead, injunctions "may only be awarded upon a clear showing that the [movant] is entitled to such relief." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 22 (2008).

IV. ARGUMENT

The Court should deny and dismiss the Petition because: (i) the Court lacks jurisdiction, since Petitioner's reporting does not constitute a significant, unlawful restraint on liberty such that he is "in custody" for purposes of habeas relief; (ii) Petitioner's reporting does not violate the Fifth Amendment's Due Process Clause; and (iii) Petitioner's reporting does not violate the immigration judge's order, the INA, or the regulations, since it relates to an administrative function of ICE, not a condition of release from custody.

A. The Court lacks jurisdiction, since Petitioner is not "in custody" by virtue of his reporting via CART

Petitioner challenges his enrollment in ISAP following his release from custody. However, since this time, Petitioner has been removed from ISAP and all

¹ Petitioner did not file a separate Complaint and instead advances his claims for injunctive and declaratory relief within his Petition for a Writ of Habeas Corpus. To the extent the Court finds that Petitioner still has standing to advance these claims following resolution of the Petition for a Writ of Habeas Corpus, Respondents ask for sixty days to file an Answer. Respondents further ask that the Court hold in abeyance any ruling on the Motion for Briefing Schedule (ECF 12), as the need for and substance of any briefing schedule will necessarily depend on the Court's ruling on the Petition for a Writ of Habeas Corpus.

concomitant requirements of that program. Nonetheless, Petitioner still argues that he remains in custody for purposes of habeas corpus because ICE is requiring him—a noncitizen with ongoing removal proceedings—to check-in once every six months via a kiosk. ECF 12, Ex. 2. This requirement does not impose a significant, unlawful restraint on the type of liberty interest meant to be protected by habeas corpus. Therefore, because Petitioner has not demonstrated the threshold requirement that he is “in custody” for habeas relief, the Court should deny the Petition for lack of jurisdiction.

Writs of habeas corpus may be granted to individuals who are, among other requirements, “in custody” in violation of the Constitution or laws of the United States. 28 U.S.C. § 2241(c). “Restraints short of incarceration may satisfy the ‘in custody’ requirement for habeas relief, but the restraint must *significantly compromise* the individual’s ‘liberty to do those things which in this country free men are entitled to do.’” *Lopez-Lopez v. Charles*, No. 12-cv-101445, 2020 WL 419598, at *3 (D. Mass. Jan. 26, 2020) (*quoting Jones v. Cunningham*, 371 U.S. 236, 243 (1963)) (emphasis added). Parole, for example, “imposes conditions which significantly confine and restrain . . . freedom, [which] is enough to keep [one] in custody” within the meaning of habeas corpus. *Cunningham* 371 U.S. at 243.

In the context of immigration detention, numerous district courts have held that the use of a GPS ankle monitor through ISAP, in combination with other reporting requirements, constitutes custody for purposes of habeas corpus and due process. *See e.g., N-N- v. McShane*, No. 25-cv-5494, 2025 WL 3143594, at *3 (E.D.

Pa. Nov. 10, 2025); *Orellana Juarez v. Moniz*, 788 F.Supp. 3d 61, 68 (D. Mass 2025) (finding habeas petitioner subject to GPS device “remains in custody” in violation of constitutional due process); *but see Chavez Lezama v. Noem*, No. 3-26-cv-00114 (W.D. Pa April 2, 2026) (finding habeas petitioner did not set forth sufficient facts to demonstrate that imposition of an ankle monitor constituted a severe restraint on his liberty). Others, including this district court, have extended this reasoning to immigrants who are not detained but subject to an order of supervision. *See e.g., DeSousa v. Garland*, 2022 WL 1773604, at *2 (E.D. Pa May 31, 2022); *Doe v. Barr*, 479 F. Supp 3d 20, 26 (S.D.NY. 2020). Less restrictive forms of reporting, however, may not rise to the level of custody for habeas purposes. *See e.g., J.P. v. Santacruz*, No. 8:25-CV-01640, 2025 WL 2633198, at *2 (C.D. Cal. Aug. 27, 2025) (finding virtual monthly check-ins through a phone application, coupled with other conditions of release such as restrictions on travel, are insufficient to demonstrate custody).

On March 27, 2026, ICE removed Petitioner from ISAP altogether, which included removal of his ankle monitor and all forms of electronic monitoring, as well as removal of all travel restrictions. ECF 12 p. 2. Nonetheless, because Petitioner remains in removal proceedings without any valid immigration status, ICE has mandated that he check-in through CART once every six months. “CART is a kiosk that CART Enrollees can use for regularly scheduled reporting visits with ICE instead of speaking with an ICE Official.” Ex. C. This easy-to-use kiosk, which offers instructions in both English, Spanish, and Portuguese, “does not require

interaction with ICE staff, and enables an individual to complete their reporting visit in only a few minutes, with shorter lines and wait times.” *Id.* Once an individual checks in via a kiosk, he or she “will be asked a few questions and offered the opportunity to speak with a staff member only if needed or requested.” *Id.* It is estimated that the reporting process using a CART kiosk takes about five minutes, and enrollees are provided a two-hour window in which to complete the check-in. *Id.* Enrollees may contact ICE if they need to reschedule their reporting date. *Id.*

Notwithstanding the infrequent, minimally invasive nature of CART reporting, Petitioner argues that he remains in custody because his “travel and movement remain restricted by forced compliance with the CART program.” ECF 12 p. 2. This is not true, as there are no travel restrictions in Petitioner’s case, specifically or with the CART program, more generally. The CART program also does not impose any type of monitoring, supervision, curfews, or employment requirements or restrictions. In fact, aside from one two-hour window every six months when he must report to ICE through the kiosk, Petitioner is otherwise free to live his life in the United States while his removal proceedings are ongoing. This one reporting condition, which ICE uses to maintain up-to-date information on noncitizens in removal proceedings on the non-detained docket, does not “significantly restrain [P]etitioner’s freedom to do those things which in this country free men are entitled to do.” *Cunningham*, 371 U.S. at 243. Therefore, because Petitioner’s reporting does not render him “in custody” for purposes of habeas corpus, the Court should deny the Petition.

The Court should similarly deny the Petition because the issue of Petitioner’s detention is now moot, since he is not in custody for purposes of habeas corpus relief. A federal court lacks jurisdiction to render opinions on moot questions—that is, “when the issues presented are no longer ‘live’ or the parties lack a legally cognizable interest in the outcome.” *Cty. of Los Angeles v. Davis*, 440 U.S. 625, 631 (1979) (quoting *Powell v. McCormack*, 395 U.S. 486, 498 (1969)). And the “live” controversy requirement must exist throughout all stages of the litigation, not merely when the complaint was filed. *See e.g., Decker v. Nw. Env’tl. Def. Ctr.*, 568 U.S. 597, 609 (2013). Therefore, “[i]f an intervening circumstance deprives the plaintiff of a ‘personal stake in the outcome of a lawsuit’ at any point during litigation, the action can no longer proceed and must be dismissed as moot.” *Campbell-Ewald Co. v. Gomez*, 577 U.S. 153, 161 (2016) (quoting *Genesis Healthcare Corp. v. Symczyk*, 569 U.S. 66, 72 (2013)).

Here, while Petitioner may have remained “in custody” through ICE’s imposition of an ankle monitor—a question that is not presently before the Court—that ankle monitor has since been removed and consequently, the issue of the lawfulness of that custody is now moot. Therefore, since Petitioner no longer has a personal stake in the outcome of the Petition, the Court should dismiss the Petition as moot.

B. Petitioner’s reporting requirement does not violate Due Process

Even assuming that this single reporting requirement placed Petitioner “in custody” for purposes of habeas relief, such condition does not violate constitutional

due process. The Fifth Amendment’s Due Process Clause forbids the government from depriving a person of “liberty” without due process of law. U.S. CONST. AM. V. And “freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the [Due Process] Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

As noted above, the temporary, minimally invasive reporting requirement imposed by ICE while Petitioner’s removal proceedings remain ongoing simply does not invoke the type of fundamental liberty interest that constitutional due process was intended to protect. *See Desousa*, 2022 WL 1773604, at *3 (denying habeas petition in a post-removal order supervision case, noting that petitioner “failed to allege facts sufficient to show a misuse of governmental power that shocks the conscience”) (quoting *Fagan v. City of Vineland*, 1296 F.3d 1296, 1303 (3d Cir. 1994); *see also Nguyen v. B.I. Inc.*, 435 F. Supp. 2d 1109, 1114–15 (D. Or. 2006) (finding that ISAP does not violate the constitutional due process rights of an alien subject to a final removal order) (*citing Demore v. Kim*, 538 U.S. 510, 521 (2003), *quoting Mathews v. Diaz*, 426 U.S. 67, 78–80 (1976) (“In the exercise of its broad power over naturalization and immigration, Congress regularly makes rules that would be unacceptable if applied to its citizens”))).

Moreover, even if deemed to be a restraint on liberty, the reporting requirement in this case serves a “legitimate government purpose,” as ICE seeks to maintain up-to-date information, including where Petitioner is living and the status of his removal proceedings, while he remains in removal proceedings without lawful

status. *See Schall v. Martin*, 467 U.S. 253, 269 (1984) (explaining that restraints on liberty are only permissible if they serve a “legitimate government purpose”). This is not information that the Executive Office for Immigration Review (EOIR) shares with ICE, as EOIR falls within a different federal agency. Therefore, the sole reporting requirement imposed on Petitioner that ICE instituted for a legitimate purpose does not violate constitutional due process.

C. Petitioner’s reporting does not violate the immigration judge’s custody redetermination order, the INA, or the regulations

Petitioner’s argument that ICE’s reporting requirement violates the immigration judge’s custody order, and in turn the INA and regulations, lacks merit. The INA authorizes ICE to arrest and detain an alien pending his or her removal proceedings. *See* 8 U.S.C. § 1226(a). However, this authority is discretionary, meaning that unless an alien falls into a ground for mandatory detention under 8 U.S.C. § 1226(c), ICE may release the alien from custody, including conditional release such as reporting and supervision, during the pendency of his removal proceedings. *Id.*; 8 C.F.R. §§ 236.1(c)(8), 1236.1(c)(8). An immigration judge, in turn, can review this custody determination, including if ICE sets conditions of release. *See* 8 C.F.R. §§ 236.1(d)(1); 1236.1(d)(1).

The timeline for this review process before the immigration judge, however, varies depending on the specific custody determination at issue. For example, *after an initial custody determination* by ICE, the noncitizen can request amelioration of the conditions under which he or she may be released, including the setting of a bond, at any time prior to entry of a final order of removal. *Id.* (emphasis added). If

after this initial custody determination the noncitizen has been released from custody, “an application for amelioration of the terms of release must be filed within [seven] days of release.” *Id.* After expiration of this seven day-period, the noncitizen may request review by the district director (now known as the field office director) of the release conditions. 8 C.F.R. §§ 236.1(d)(2); 1236.1(d)(2). If ICE sets conditions of release either unilaterally or upon order of an immigration judge, ICE, not the immigration judge, maintains the sole authority to enforce and ensure compliance with those conditions of release.

Petitioner argues that his reporting requirement is unlawful because it goes beyond the terms of the immigration judge’s order. This is not so. The immigration judge’s order addressed Petitioner’s release *from custody*. It did not address non-custodial conditions or requirements that ICE may later impose. It is illogical to think that an immigration judge could or would dictate, for example, reporting requirements of another federal agency when reviewing and deciding the unrelated issue of a noncitizen’s request for release from custody. This is particularly true for CART reporting, which is dependent on whether the ICE office closest to where the noncitizen resides has a kiosk to facilitate this type of reporting.

Petitioner’s argument is further undermined by the nature of immigration law as it applies to persons in removal proceedings. The INA and regulations charge ICE with monitoring those present without a lawful basis, including aliens in removal proceedings who are released from custody under conditions. *See* 8 U.S.C. § 1226(a); 8 C.F.R. § 236.1(d)(2). That task, however, presents a significant challenge.

As of the third quarter of fiscal year 2025, EOIR had 3,884,956 pending cases nationwide. *See* EOIR, Workload and Adjudication Statistics, <https://www.justice.gov/eoir/media/1344791/dl?inline> (last updated July 31, 2025). For that same period, EOIR completed 588,128 cases, which represents less than fifteen percent of the more than three million pending cases. *Id.* In fiscal year 2025, the average wait time in Pennsylvania for completion of an immigration case for individuals like Petitioner released from custody was 1,471 days, or **four years**. *See* TRAC Immigration, Outcome of Immigration Court Proceedings, <https://tracreports.org/phptools/immigration/closure/>. If the Court adopted Petitioner's arguments, it would foreclose ICE from imposing *any* condition on a noncitizen in removal proceedings *at any point after* an immigration judge's custody order. In other words, Petitioner asks this Court to determine that unless an alien presents a danger to the community or a proven flight risk—which is the standard ICE and immigration judges use to determine whether an alien should be released from custody—ICE is prohibited from doing anything to ensure that the alien participates in their proceedings. That position is contrary to the statute and is simply not tenable.

Even if the Court were to find that an immigration judge is authorized to set this type of reporting as a condition of release from custody, the fact that the immigration judge failed to do so does not foreclose ICE from imposing its own conditions of release. To the contrary, the plain reading of the regulations permit ICE to impose conditions of release following an initial custody determination, with

the opportunity for the noncitizen to then seek review of those conditions by an immigration judge within seven days. *See* 8 C.F.R. §§ 236.1(d)(1); 1236.1(d)(1). This reading of the regulation is the only reading that would allow ICE to maintain its authority to monitor those unlawfully present in the United States, while also ensuring that there are still checks on that authority through review by an immigration judge within seven days. *But see* *N-N-*, 2025 WL 3143594, at *3 (rejecting government’s interpretation of regulations and finding that ICE cannot impose additional release conditions without utilizing administrative appeal process); *Orellana Juarez*, 788 F.Supp. at 68 (same).

Therefore, ICE’s conduct did not violate the regulations, or in turn, the Administrative Procedure Act or the *Accardi* doctrine. As such, the Court should deny the Petition.

V. CONCLUSION

For all the foregoing reasons, Respondents respectfully request that the Court deny the Petition for a Writ of Habeas Corpus.

Respectfully submitted,

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/s/ Susan R. Becker for GBD
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Assistant United States Attorney
Chief, Civil Division

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Dated: April 7, 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: April 7, 2026

/s/ Daniella D. Lees

DANIELLA D. LEES
Assistant United States Attorney

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EXHIBIT LIST

Exhibit A: Form I-213, Record of Deportable/Inadmissible Alien (dated Oct. 24, 2025).


Exhibit B: Form I-200, Warrant for Arrest of Alien (dated Oct. 24, 2025).

Exhibit C: CART General Information for Enrollees

U.S. Department of Homeland Security

Subject ID : [REDACTED]

Record of Deportable/Inadmissible Alien

Family Name (CAPS) [REDACTED]		First [REDACTED]	Middle [REDACTED]	Sex M	Hair BLK	Eyes BRO	Cmpbn MED
Country of Citizenship NICARAGUA	Passport Number and Country of Issue [REDACTED] NICARAGUA	File Number [REDACTED]		Height 66	Weight 135	Occupation LABORER	
U.S. Address [REDACTED] PHILADELPHIA, PENNSYLVANIA, 19124, UNITED STATES				Scars and Marks			
Date, Place, Time, and Manner of Last Entry Unknown Date Unknown Time,			Passenger Boarded at	F.B.I. Number [REDACTED]			
Number, Street, City, Province (State) and Country of Permanent Residence				<input checked="" type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated			
Date of Birth [REDACTED] Age: 29	Date of Action 10/24/2025	Location Code PHI/PHI		Method of Location/Apprehension NCA			
City, Province (State) and Country of Birth NICARAGUA	AR <input checked="" type="checkbox"/>	Form : (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>		At/Near See I-831	Date/Hour 10/24/2025 13:16		
NIV Issuing Post and NIV Number	Social Security Account Name			By R MOREL			
Date Visa Issued	Social Security Number			Status at Entry	Status When Found		
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 [REDACTED] NATIONALITY: NICARAGUA		Mother's Present and Maiden Names, Nationality, and Address, if Known [REDACTED] NATIONALITY: NICARAGUA		Monies Due/Property in U.S. Not in Immediate Possession None Claimed			
Name and Address of (Last)(Current) U.S. Employer		Type of Employment Unemployed or Retired	Salary	Charge Code Word(s) See Narrative			
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				Employed from/to Hr			
							
FAMILY INFORMATION							
Father: [REDACTED] is a citizen of NICARAGUA. Mother: [REDACTED] is a citizen of NICARAGUA. 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)				M 1147 ATTANASIO Deportation Officer _____ (Signature and Title of Immigration Officer)			
Distribution:				Received: (Subject and Documents) (Report of Interview)			
				Officer: M 1147 ATTANASIO			
				on: October 24, 2025 (time)			
				Disposition: Warrant of Arrest/Notice to Appear			
				Examining Officer: MOREL, R			

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name [REDACTED]	File Number [REDACTED] Event No: [REDACTED]	Date 10/24/2025
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CURRENT ADMINISTRATIVE CHARGES

10/24/2025 - 212a6Ai - ALIEN PRESENT WITHOUT ADMISSION OR PAROLE - (PWAs) 10/24/2025 - 212a7AiI - IMMIGRANT WITHOUT AN IMMIGRANT VISA

ARRESTED AT/NEAR

114 N 8TH ST, PHILADELPHIA, PENNSYLVANIA, 19107, UNITED STATES

RECORD OF DEPORTABLE/EXCLUDABLE ALIEN:

ENCOUNTER

On October 24, 2025, ICE Enforcement and Removal Operations Philadelphia, PA (ERO-PHI) officers encountered [REDACTED], herein referred to as [REDACTED], at 114 N 8th Street, Philadelphia, PA 19107 as he was reporting to Philadelphia ICE/ERO for his scheduled report date. A review of [REDACTED] case revealed that he was never served a Notice to Appear (I-862) or placed in any type of removal proceedings. Officers established positive identification through an interview and prior immigration photo. Officers identified themselves and advised [REDACTED] that he was going to be taken into custody and detained by ERO. [REDACTED] was taken into the Philadelphia Field Office detention area for further processing. [REDACTED] was offered Voluntary Departure and \$1,000 but refused. [REDACTED] was processed as I-862 Notice to Appear.

IMMIGRATION HISTORY

[REDACTED] was initially encountered by a United States Border Patrol (USBP) Agent in the Rio Grande Valley, Texas Border Patrol Sector. A Border Patrol Agent determined this [REDACTED] had unlawfully entered the United States through Mexico, at a time and place other than as designated by the Secretary of the Department of Homeland Security of the United States. After determining that the [REDACTED] was an alien who illegally entered the United States, the [REDACTED] was arrested and transported to the Ursula Rio Grande Valley Centralized Processing Center in McAllen, Texas for further processing using the E3/IDENT and IAFIS Systems. [REDACTED] was released with Alternate to Detention as a Condition of Parole.

IMMIGRATION/CRIMINAL VIOLATION:

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.

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.

HEALTH AND HUMANITARIAN

BARRERA-TRUJILLO claims that he is in good health and takes no medication.
 BARRERA-TRUJILLO claims he is not married and does not have any children.
 BARRERA-TRUJILLO has not served in the U.S. Military.
 BARRERA-TRUJILLO claims fear of returning to Nicaragua.
 Consular notification is not mandatory.
 BARRERA-TRUJILLO claims to reside at [REDACTED] Philadelphia PA 19124.

Signature M 1147 ATTANASIO	Title Deportation Officer
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U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name [REDACTED]	File Number [REDACTED] Event No: [REDACTED]	Date 10/24/2025
DISPOSITION: BARRERA-TRUJILLO served an I-862 Notice to Appear and will be detained in ICE custody. BARRERA-TRUJILLO has pending I-589 and has been found eligible for interview.		
OTHER IDENTIFYING NUMBERS ----- ALIEN-[REDACTED]		
Signature M 1147 ATTANASIO	Title Deportation Officer	

3 of 3 Pages

U.S. DEPARTMENT OF HOMELAND SECURITY

Warrant for Arrest of Alien

File No. [Redacted]

Date: 10/24/2025

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that [Redacted] is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
the pendency of ongoing removal proceedings against the subject;
the failure to establish admissibility subsequent to deferred inspection;
biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

YOU ARE COMMANDED to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

[Signature]
(Signature of Authorized Immigration Officer)

M 1147 ATTANASIO - Deportation Officer
(Printed Name and Title of Authorized Immigration Officer)

Certificate of Service

I hereby certify that the Warrant for Arrest of Alien was served by me at Philadelphia, PA (Location)

on [Redacted] on October 24, 2025, and the contents of this (Name of Alien) (Date of Service)

notice were read to him or her in the SPANISH language. (Language)

R MOREL

Deportation Officer [Signature]
Name and Signature of Officer

[Signature]
Name or Number of Interpreter (if applicable)

Checklist of What to Bring When Reporting to the CART Kiosk:

- I-220A or I-220B Form**
(you will be required to enter your A Number to use the CART Kiosk, which can be found on this form)
- All regular immigration documentation**
- Previous CART Kiosk receipts**
(if you have used the CART Kiosk before)
- Wired headphones**
(only necessary if you need to hear audio instructions when using the CART Kiosk)

Next CART Reporting Appointment

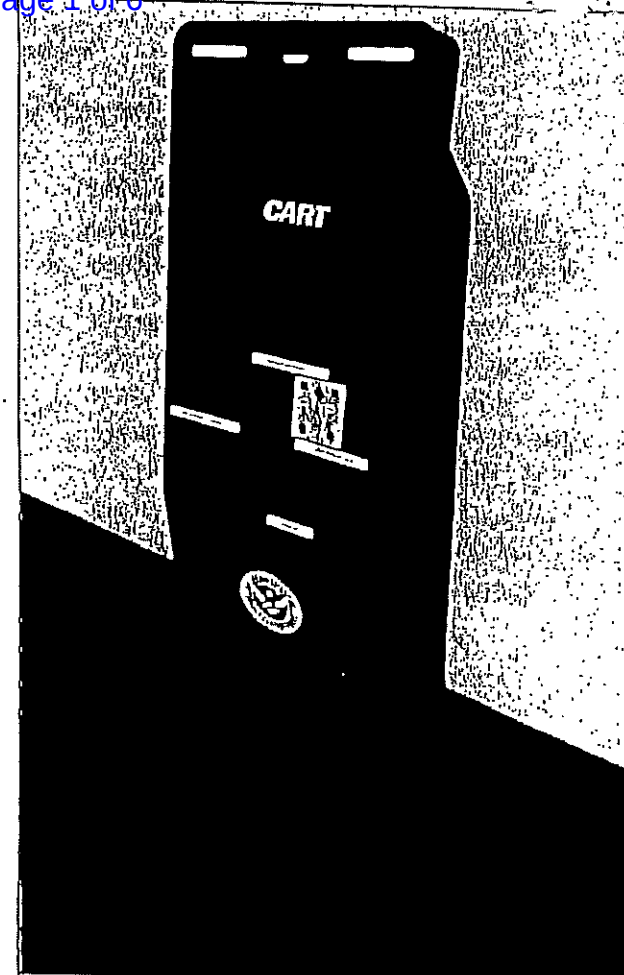
Use the space below to record the date and time of your next CART Kiosk reporting appointment.

Date	Time



U.S. Immigration and Customs Enforcement

CART



CART

General Information For Enrollees



U.S. Immigration and Customs Enforcement

What is CART?

- CART is a kiosk that CART Enrollees can use for regularly scheduled reporting visits with ICE instead of speaking with an ICE Official.
- The CART Kiosk is easy to use, does not automatically require interaction with ICE staff, and enables an individual to complete their reporting visit in only a few minutes, with shorter lines and wait times.
- As a CART Enrollee, you will be guided through the reporting process with on-screen prompts and optional audio instructions.
- To use the CART Kiosk, simply walk up and tap the touchscreen during your scheduled reporting timeframe to get started.
- The CART Kiosk offers instructions in both English and Spanish.

Why CART?

CART Benefits May Include:

- 1 Easier reporting to ICE
- 2 Faster reporting visits
- 3 Limited interaction with ICE Officials

Where is the CART Kiosk?

- CART Kiosks are located in waiting rooms of certain ICE offices.
- Signs will be posted in the office to help you find the CART Kiosks.
- You should always report to the ICE office where you were enrolled in CART.

Top Things to Know About Using CART

- As a CART Enrollee, next time you report for your ICE visit, you should go directly to the CART Kiosk.
- You will need to know your A Number to use the CART Kiosk. This can be found on your I-220 A/B form.
- You will not be allowed to report to the CART Kiosk early or late. It is critical to arrive during your scheduled reporting timeframe.
- Bring all regular Immigration documentation with you when reporting to the CART Kiosk.
- You will get a printed CART Kiosk receipt after each use, which you should read carefully for your next reporting date and/or any further instructions. *You may also write your next CART reporting date in the space provided on the back of this pamphlet.*
- Keep CART Kiosk receipts with your records and store them away from heat and sunlight.



CART

FREQUENTLY ASKED QUESTIONS (FAQs)

1) What is CART?

CART is a kiosk that enrolled individuals can use for their regularly scheduled reporting visits with ICE instead of speaking with an ICE Official. It is much like an ATM where an individual is guided through the process with onscreen prompts.

2) Why should I use CART?

The CART Kiosk is easy to use, does not automatically require interaction with ICE staff, and enables an individual to complete his or her reporting visit in only a few minutes. CART Enrollees will be asked a few questions and offered the opportunity to speak with a staff member only if needed or requested.

3) Who can use CART?

Only those individuals enrolled in CART by ICE staff may use the CART Kiosk for regular reporting. Enrollment occurs in an ICE office.

4) Who is eligible to enroll in CART?

Individuals who have received an Order of Supervision (I-220B) or an Order of Release on Recognizance (I-220A) may be considered by ICE staff for enrollment in CART.

5) How does an Enrollee use the CART Kiosk?

The kiosk is designed to be easy to use. Once an individual is enrolled, the Enrollee can walk up to the kiosk and tap the touchscreen to start, then follow the onscreen prompts to be led through the process.

6) Does a CART Enrollee need to be able to read or speak English to use the CART Kiosk?

The CART Kiosk offers instructions in English, Spanish, and Portuguese. More languages will be added in the future.

7) Where can an individual enroll in CART?

An individual can be enrolled in CART during his or her regularly scheduled reporting visit to an ICE office that is enabled with a CART Kiosk.

8) What documentation is needed to enroll in CART?

Individuals with Orders of Supervision or Order of Release on Recognizance should always bring their regular immigration documentation with them when reporting to an ICE office. ICE Officials will assess individuals for enrollment in CART during their regularly scheduled visit to an ICE office and may need this documentation.



9) What should CART Enrollees bring when reporting to the CART Kiosk?

CART Enrollees should bring their regular documentation with them, even when using the CART Kiosk. The CART Kiosk requires Enrollees to enter their Alien Number (A Number) to use the kiosk, which can be found on their Order of Supervision (I-220B) or Order of Release on Recognizance (I-220A) form.

10) Where are the CART Kiosks located?

CART Kiosks are located in waiting rooms of certain ICE offices. Signs will be posted in the office to help CART Enrollees locate the kiosks.

11) Can a CART Enrollee report to any CART Kiosk, or does it have to be the kiosk at their assigned reporting location?

A CART Enrollee must report to the CART Kiosk at the same location where he or she was enrolled in CART. If an Enrollee wishes to report to a different office, he or she must discuss it with an ICE Official.

12) If there are multiple kiosks at an ICE reporting location, can a CART Enrollee use any available kiosk?

Yes, an Enrollee may use any available kiosk at his/her designated reporting location.

13) Must an Enrollee arrive at a designated time for a CART Kiosk reporting visit?

CART Enrollees are required to report to the CART Kiosk during the time period assigned at their previous reporting visit. Enrollees should arrive early enough to report on time if there are people in line ahead of them. For example, if an Enrollee is scheduled to report between 2:00-4:00 PM, the Enrollee should arrive no earlier than 2:00 PM and no later than 3:30 PM to ensure that he/she can complete the reporting process on time. The kiosk will not allow an Enrollee to report early or late, so it is critical to arrive and report during the scheduled reporting time period.

14) How does a CART Enrollee obtain a designated time to use the CART Kiosk?

Upon enrolling an individual in CART, an ICE Official will inform the individual of the date and time of his/her next CART Kiosk reporting visit, as well as how often he/she will need to report to the CART Kiosk.

15) How long does it take to enroll in CART?

CART enrollment will take place during an individual's regularly scheduled reporting visit with ICE and will only add a few minutes to the individual's visit.

16) Once enrolled, how long does it take an individual to complete a CART Kiosk session?

The reporting process using the CART Kiosk should take approximately five minutes. If additional review by an officer is necessary, this may add more time to an Enrollee's reporting visit to the ICE office.

17) Is the CART Kiosk accessible to users who are blind, deaf, or physically handicapped?

CART Kiosks are fully compliant with all U.S. accessibility laws. The CART Kiosk includes braille, a navigation pad, and audio instructions to support customers with disabilities such as blindness, deafness, and physical handicaps. CART Enrollees who need or want to hear audio when using the kiosk must bring their own headphones and plug them into the headphone jack located on the front navigation pad. There is an instruction screen on the kiosk that will show users where to find the headphone jack.

18) If an individual is enrolled in CART, are they required to use the CART Kiosk?

Once an individual is enrolled in CART, he or she is expected to use the CART Kiosk during their reporting visits. If a CART Enrollee reports to a window instead, they may be redirected back to the kiosk. However, if an Enrollee is uncomfortable using the kiosk, he or she may request to see an ICE Official and ask to be unenrolled from CART.

19) Will there be anyone present to help Enrollees with using the CART Kiosk?

The CART Kiosk is self-service and designed to be very easy to use by following the instructions on the screen. If an individual is uncomfortable using the kiosk, he or she may request to see an ICE Official and ask to be unenrolled from CART.

20) Will CART Enrollees be given a date and timeframe to report?

When an individual is initially enrolled to use the CART Kiosk, an ICE Official will provide the individual with a date and timeframe for reporting to the kiosk for the first time. Once a CART Enrollee begins using the CART Kiosk, the individual will receive a new appointment each time, either from the kiosk or from an ICE Official.

21) Can CART Enrollees line up to report when the building opens, or do they have to wait for their assigned appointment time/timeframe?

ICE does not want CART Enrollees to wait in line any longer than necessary to use the CART Kiosk! CART Enrollees are required to report to the CART Kiosk during the time period they were assigned, and only a limited number of people are scheduled to report during that same time period.

Enrollees should arrive early enough to leave time to report if there are people in line ahead of them. For example, if an Enrollee is scheduled to report between 2:00-4:00 PM, he or she should arrive no earlier than 2:00 PM and no later than 3:30 PM to ensure that they can complete the reporting process on time. The kiosk will not allow an individual to report early.

22) Will individuals enrolled in CART still be able to speak to an ICE Official if needed?

Individuals who are enrolled in CART should always report to the kiosk. The CART Kiosk will give Enrollees the opportunity to request to see an ICE Official, if needed.

23) What should CART Enrollees do with their CART Kiosk receipt?

CART Enrollees should always take their receipt from the CART Kiosk, read it immediately, and follow any additional instructions. Enrollees should keep CART receipts with their records and store them away from heat and sunlight.

24) Can CART Enrollees reschedule their CART reporting date? If so, how?

CART Enrollees may contact the ICE office where they report and request that their CART reporting appointment be rescheduled. Unless an ICE Official provides an Enrollee with a new appointment date and time, the Enrollee must report during his or her originally scheduled appointment.

25) How do CART Enrollees know what time to show up for CART reporting?

CART Enrollees can find their next reporting date/time handwritten on page 2 of their Order of Supervision (I-220B) or Order of Release on Recognizance (I-220A) form or printed on their CART Kiosk receipt. Enrollees should always keep documents provided to them by an ICE Official or the CART Kiosk.



26) Should CART Enrollees still report to the same place?

Yes, CART Enrollees must report to the ICE office where they were enrolled to use CART.

27) Should CART Enrollees still report at the same time?

CART Enrollees are required to report to the CART Kiosk during the time period that they were assigned at their previous reporting visit. Enrollees should arrive early enough to report on time if there are people in line before them. For example, if an Enrollee is scheduled to report between 2:00-4:00 PM, the Enrollee should arrive no earlier than 2:00 PM and no later than 3:30 PM to ensure that they can complete the reporting process on time. The kiosk will not allow individuals to report early or late, so it is critical that Enrollees arrive during their scheduled reporting time period.

28) Where do CART Enrollees line up to use the kiosk? Is there a separate line/waiting area for CART users?

CART Enrollees may proceed directly to any available kiosks if there is no one else waiting to use them. If there is a line near the kiosks, Enrollees should join that line, which may be roped off or marked with "CART" signage.

29) Does the CART Kiosk have audio instructions available?

Yes, the kiosk has audio instructions. CART Enrollees who need or want to hear audio when using the kiosk must bring their own headphones and plug them into the headphone jack located on the front navigation pad. There is an instruction screen on the kiosk that will show users where to find the headphone jack.

30) Can a CART Enrollee receive assistance, or assist someone else, with using the CART Kiosk?

Yes, CART Enrollees may receive assistance from another individual, or assist someone else with using the CART Kiosk. However, the alien who is reporting is responsible for all information inputted and must remain directly in front of the kiosk during the entire kiosk session so that his/her fingerprints and facial photo may be captured. Failure to use the kiosk appropriately may result in removal from the CART program.