

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
CIVIL ACTION**

ADILET AKMATBEKOV,

Petitioner,

v.

Case No. _____

JL JAMISON, WARDEN, Federal Detention Center,
Philadelphia, in his official capacity;
FIELD OFFICE DIRECTOR, Philadelphia
ERO Field Office, in his official capacity;
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement, in
his official capacity; MARKWAYNE MULLIN,
Secretary, U.S. Department of Homeland
Security, in his official capacity; U.S.
DEPARTMENT OF HOMELAND SECURITY;
PAMELA BONDI, Attorney General of the
United States, in her official capacity,

Respondents.

**PETITIONER'S EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Petitioner Adilet Akmatbekov ("Petitioner"), by and through undersigned counsel, respectfully moves this Honorable Court for an Emergency Temporary Restraining Order and Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65, and in support thereof states as follows:

Petitioner is a twenty-year-old asylum seeker from Kyrgyzstan who has been detained by ICE at the Federal Detention Center in Philadelphia without any individualized bond hearing or meaningful opportunity to contest his detention. Petitioner's asylum case remains pending before the Philadelphia Immigration Court. No final order of removal has been entered.

The grounds for this Motion are set forth in detail in the accompanying Memorandum of Law in Support of Petition for Writ of Habeas Corpus and Emergency Motion for Temporary Restraining Order, the concurrently filed Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241, the exhibits filed in support thereof, and the applicable law.

A proposed order accompanies this Motion. Petitioner respectfully requests that the Court waive any requirement that Petitioner post a bond or other security pursuant to Rule 65(c), as Petitioner is indigent and detained, and imposition of a bond requirement would effectively deny relief.

WHEREFORE, Petitioner respectfully requests that this Court: (1) issue a Temporary Restraining Order enjoining Respondents from continuing to detain Petitioner without an individualized bond hearing; (2) order Petitioner's immediate release from custody or, in the alternative, order a bond hearing within fourteen (14) days; (3) enjoin Respondents from removing or transferring Petitioner outside this judicial district during the pendency of this action; and (4) convert the Temporary Restraining Order to a Preliminary Injunction following a hearing on the merits.

Dated: April __1__, 2026

Respectfully submitted,

/s/Jonathan J. Sobel

JONATHAN J. SOBEL, ESQUIRE

PA Bar No. 76428

Law Offices of Jonathan J. Sobel

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

Tel: (215) 735 7535

Email: mate89@aol.com

Counsel for Petitioner

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
CIVIL ACTION**

ADILET AKMATBEKOV,

Petitioner,

v.

Case No. _____

JL JAMISON, WARDEN, Federal Detention Center,
Philadelphia, in his official capacity;
FIELD OFFICE DIRECTOR, Philadelphia
ERO Field Office, in his official capacity;
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement, in
his official capacity; MARKWAYNE MULLIN,
Secretary, U.S. Department of Homeland
Security, in his official capacity; U.S.
DEPARTMENT OF HOMELAND SECURITY;
PAMELA BONDI, Attorney General of the
United States, in her official capacity,

Respondents.

**MEMORANDUM OF LAW IN SUPPORT OF
PETITION FOR WRIT OF HABEAS CORPUS AND
EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**

INTRODUCTION

Petitioner Adilet Akmatbekov ("Petitioner") respectfully submits this Memorandum of Law in support of his Petition for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and his Emergency Motion for a Temporary Restraining Order and Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65.

Petitioner is a twenty-year-old citizen of Kyrgyzstan who came to the United States as a child in 2017 with his family, [REDACTED] He was placed in removal proceedings and released on his own recognizance under 8 U.S.C. § 1226(a) on September 27, 2017. His asylum case remains pending before the Philadelphia Immigration Court. No final order of removal has been entered.

Following an arrest on state criminal charges in October 2025 — charges on which Petitioner is presumed innocent and which remain pending — ICE took Petitioner into federal custody at the Federal Detention Center in Philadelphia. Petitioner has been denied any individualized bond hearing or meaningful opportunity to contest his detention.

More than 300 federal district courts have rejected the Government's attempt to retroactively reclassify individuals like Petitioner under 8 U.S.C. § 1225(b)(2)(A) based on the Board of Immigration Appeals' decisions in *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), and *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). This Court should join the overwhelming judicial consensus and order Petitioner's immediate release or, in the alternative, a prompt bond hearing.

STATEMENT OF FACTS

Petitioner Adilet Akmatbekov is a citizen and national of Kyrgyzstan, born on [REDACTED]

[REDACTED] He entered the United States in 2017 at approximately eleven years of age, together with his

father Ruslan Chakarov, his mother Meerim Zhabueva, and his siblings [REDACTED]

[REDACTED]. The family fled Kyrgyzstan due to [REDACTED]

[REDACTED] (Pet. ¶¶ 11-12; Ex. B.)

On September 26, 2017, DHS issued a Notice to Appear charging Petitioner as removable. On September 27, 2017, ICE released Petitioner on an Order of Recognizance (Form I-220A) pursuant to 8 U.S.C. § 1226(a). (Pet. ¶¶ 13-14; Ex. B.) This classification — under Section 236 of the INA — has been Petitioner's operative detention authority for over eight years. Petitioner complied with all conditions of his release, including regular reporting to the ICE Philadelphia office. (Pet. ¶ 15; Ex. G.)

The family's asylum case has been pending before the Philadelphia Immigration Court for nearly a decade. An individual merits hearing was most recently scheduled for November 12, 2025. (Pet. ¶ 16; Ex. C, D.) The hearing was continued and the case remains pending. No final order of removal has been entered against Petitioner.

On October 18, 2025, Petitioner was arrested in Bucks County, Pennsylvania, on state charges of Criminal Trespass (18 Pa.C.S. § 3503(a)(1)(ii), F2) and Criminal Mischief (18 Pa.C.S. § 3304(a)(5), M3). (Pet. ¶ 17; Ex. E.) Petitioner has not been convicted of any crime. The charges remain pending before the Bucks County Court of Common Pleas. (Ex. E, F.) Petitioner is entitled to the presumption of innocence.

ICE subsequently took Petitioner into federal custody and transferred him to the Federal Detention Center in Philadelphia, where he remains detained without a bond hearing. (Pet. ¶¶ 20-21.)

ARGUMENT

I. PETITIONER IS ENTITLED TO A BOND HEARING UNDER 8 U.S.C. § 1226(a)

The Immigration and Nationality Act establishes two parallel statutory frameworks governing the detention of noncitizens: Section 1225 applies to "applicants for admission" at ports of entry, and Section 1226 applies to individuals already in the United States who are placed in removal proceedings. *Jennings v. Rodriguez*, 583 U.S. 281, 298-99 (2018). These are distinct tracks with different procedural protections.

Petitioner was classified and released under § 1226(a) in 2017. Under the regulations that have been in effect since 1997, individuals who entered without inspection and were placed in § 240 removal proceedings — rather than expedited removal under § 235 — are processed under § 1226, not § 1225. See 62 Fed. Reg. 10,312, 10,323 (Mar. 6, 1997). This regulatory framework was designed to ensure that individuals like Petitioner, who are already physically present in the United States and in removal proceedings, receive the bond hearing protections of § 1226(a).

In 2025, the BIA issued *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), and *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), purporting to retroactively extend § 1225(b)(2)(A) to individuals previously classified and released under § 1226(a). The overwhelming majority of federal courts have rejected this interpretation. As the court observed in *Toure v. Bondi*, No. 3:26-cv-00323 (M.D. Pa. Feb. 27, 2026), the combination of retroactive reclassification and mandatory detention without a bond hearing "creates an untenable situation" that violates both the INA and the Due Process Clause.

Following the Supreme Court's decision in *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024), which overruled *Chevron* deference, courts must exercise independent judgment in interpreting statutory provisions. The BIA's interpretation in *Q. Li* and *Yajure Hurtado* is entitled

to no deference. The plain text of § 1225(b)(2)(A) applies to "applicants for admission" — a term of art that does not encompass individuals who have been in the United States for years, were placed in § 240 proceedings, and were released under § 1226(a).

II. PETITIONER'S DETENTION WITHOUT A BOND HEARING VIOLATES DUE PROCESS

The Due Process Clause of the Fifth Amendment prohibits the Government from depriving any person of liberty without due process of law. This protection extends to all persons within the United States, regardless of immigration status. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). Under *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976), three factors determine what process is due.

A. Petitioner's Private Interest Is Fundamental

Physical liberty is "the most elemental of liberty interests." *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004). Petitioner is a twenty-year-old who came to this country as a child. He has spent more than half his life in the United States. His family — his parents and siblings — remain in the Philadelphia community. Every day of continued detention without process deepens the deprivation of this fundamental interest.

B. The Risk of Erroneous Deprivation Is Substantial

Without any individualized hearing, there is no mechanism to determine whether Petitioner's detention is justified. The Government has made no showing before any neutral decisionmaker that Petitioner poses a danger to the community or a flight risk — the only two interests that can justify immigration detention. *Zadvydas*, 533 U.S. at 690. The pending criminal charges, standing alone, do not establish dangerousness; Petitioner is presumed innocent and has not been convicted of any offense.

C. The Government's Interest Does Not Justify Detention Without Process

The Government's legitimate interests in preventing flight and protecting the community are fully served — indeed, better served — by an individualized bond hearing rather than blanket detention. A bond hearing allows an Immigration Judge to impose conditions tailored to any specific risk Petitioner may pose, including bond amounts, GPS monitoring, and reporting requirements. The cost of providing such a hearing is minimal.

All three Mathews factors weigh heavily in Petitioner's favor. His continued detention without any process violates the Fifth Amendment.

III. THE COURT SHOULD GRANT A TEMPORARY RESTRAINING ORDER

A party seeking a TRO must demonstrate: (1) a likelihood of success on the merits; (2) irreparable harm absent injunctive relief; (3) the balance of equities favors injunctive relief; and (4) an injunction is in the public interest. *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008). All four factors favor Petitioner.

A. Petitioner Is Likely to Succeed on the Merits

As demonstrated above, Petitioner's detention without a bond hearing violates both the INA and the Due Process Clause. The overwhelming judicial consensus — more than 300 federal district courts rejecting the Government's § 1225(b)(2) reclassification theory — establishes a strong likelihood of success on the merits.

B. Petitioner Will Suffer Irreparable Harm Absent Relief

"The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (plurality). The same principle applies with even greater force to the deprivation of physical liberty. Each day that

Petitioner remains detained without process compounds the irreparable injury. This harm cannot be remedied by monetary damages.

C. The Balance of Equities and Public Interest Favor Relief

The balance of equities tips sharply in Petitioner's favor. The Government's interest in immigration enforcement is not undermined by providing an individualized hearing — it is served by it. The public interest is served by ensuring that the Government complies with the law and that constitutional protections are honored. There is no public interest in unconstitutional detention.

IV. PETITIONER SHOULD NOT BE REQUIRED TO POST BOND UNDER RULE 65(c)

Federal Rule of Civil Procedure 65(c) permits the Court to waive or set a nominal bond. Courts routinely waive the bond requirement for indigent detainees challenging their immigration detention. *See, e.g., Temple Univ. v. White*, 941 F.2d 201, 219-20 (3d Cir. 1991) (bond requirement flexible, not absolute). Petitioner is indigent and detained; imposing a bond would effectively deny relief.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Court grant the Petition for Writ of Habeas Corpus and the Emergency Motion for Temporary Restraining Order and Preliminary Injunction. Petitioner requests that the Court order his immediate release from custody or, in the alternative, order Respondents to provide him with an individualized bond hearing within fourteen (14) days at which the Government bears the burden of justifying his continued detention by clear and convincing evidence.

Respectfully submitted,

/s/Jonathan J. Sobel

JONATHAN J. SOBEL, ESQUIRE

PA Bar No. 76428

Law Offices of Jonathan J. Sobel

1500 Walnut Street, Suite 900

Philadelphia, PA 19102

Tel: (215) 735 7535

Email: mate89@aol.com

Counsel for Petitioner

Date: April 1, 2026

CERTIFICATE OF SERVICE

I hereby certify that on April _1_, 2026, a true and correct copy of the foregoing Memorandum of Law in Support of Petition for Writ of Habeas Corpus and Emergency Motion for Temporary Restraining Order was served upon the following by the means indicated:

VIA CM/ECF ELECTRONIC FILING:

All counsel of record who are registered CM/ECF users will be served by the Court's electronic filing system.

VIA UNITED STATES FIRST-CLASS MAIL:

by depositing a true and correct copy in the United States Mail, first-class postage prepaid, addressed to:

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

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

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

Markwayne Mullin, Secretary
U.S. Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528

Office of the General Counsel
U.S. Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528

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

United States Attorney's Office
Eastern District of Pennsylvania
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106

/s/ Jonathan J. Sobel
JONATHAN J. SOBEL ESQUIRE

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
CIVIL ACTION**

ADILET AKMATBEKOV,

Petitioner,

v.

Case No. _____

JL JAMISON, WARDEN, Federal Detention Center,
Philadelphia, in his official capacity;
FIELD OFFICE DIRECTOR, Philadelphia
ERO Field Office, in his official capacity;
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement, in
his official capacity; MARKWAYNE MULLIN,
Secretary, U.S. Department of Homeland
Security, in his official capacity; U.S.
DEPARTMENT OF HOMELAND SECURITY;
PAMELA BONDI, Attorney General of the
United States, in her official capacity,

Respondents.

[PROPOSED] TEMPORARY RESTRAINING ORDER

AND NOW, this _____ day of _____, 2026, upon consideration of Petitioner,
ADILET AKMATBEKOV's Emergency Motion for Temporary Restraining Order and
Preliminary Injunction, and good cause having been shown, it is hereby ORDERED as follows:

1. Petitioner's Emergency Motion for Temporary Restraining Order is GRANTED.
2. Respondents shall RELEASE Petitioner from custody forthwith, subject to reasonable conditions of supervision.
3. Respondents are TEMPORARILY RESTRAINED from detaining Petitioner under 8 U.S.C. § 1225(b)(2) or the authority of Matter of Q. Li, 29 I&N Dec. 66 (BIA 2025), or Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025).
4. Respondents are TEMPORARILY RESTRAINED from transferring Petitioner outside this judicial district.

5. A hearing on Petitioner's Motion for Preliminary Injunction shall be held on _____, 2026, at _____ a.m./p.m.
6. Respondents shall SHOW CAUSE why a preliminary injunction should not issue. Response is due within _____ days of this Order.
7. The Clerk of Court shall serve this Order on all parties via CM/ECF.

SO ORDERED.

United States District Judge

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

Case No. ____

ADILET AKMATBEKOV,

Petitioner,

v.

**WARDEN, Federal Detention Center Philadelphia,
ERO FIELD OFFICE DIRECTOR, Philadelphia,
TODD LYONS, Acting Director, ICE,
MARKWAYNE MULLIN, Secretary, DHS,
U.S. DEPARTMENT OF HOMELAND SECURITY,
PAMELA BONDI, Attorney General,**

Respondents.

**PETITIONER'S EXHIBITS IN SUPPORT OF
PETITION FOR WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241**

TABLE OF CONTENTS

EXHIBIT	DESCRIPTION	PAGE
A	Order of Release on Recognizance (Form I-220A), dated Sep...	4
B	Notice of Hearing Before Immigration Judge	9
C	Immigration Judge Order Granting Motion to Calendar Indiv...	11
D	Bucks County Court of Common Pleas Criminal Docket Sum...	16
E	Magisterial District Court Summary	18
F	ICE/DHS Reporting Requirements Sheet for Adilet Akmatb...	20
G	EOIR Individual Hearing Notice for Adilet Akmatbekov	26
	Proof of Service	28

EXHIBIT A

Order of Release on Recognizance (Form I-220A), dated September 27, 2017

EXHIBIT B

Notice of Hearing Before Immigration Judge

NOTICE OF HEARING IN REMOVAL PROCEEDINGS
 IMMIGRATION COURT
 900 MARKET STREET, SUITE 504
 PHILADELPHIA, PA 19107

RE: CHAKAROV, RUSLAN

DATE: Oct 24, 2017

FILE: [REDACTED]

TO:

CHAKAROV, RUSLAN
 MIRAN AZYKOV
 [REDACTED]

Please take notice that the above captioned case has been scheduled for a MASTER hearing before the Immigration Court on Nov 28, 2017 at 08:30 A.M. at:

900 MARKET STREET, COURTROOM 2
 PHILADELPHIA, PA 19107

You may be represented in these proceedings, at no expense to the Government, by an attorney or other individual who is authorized and qualified to represent persons before an Immigration Court. Your hearing date has not been scheduled earlier than 10 days from the date of service of the Notice to Appear in order to permit you the opportunity to obtain an attorney or representative. If you wish to be represented, your attorney or representative must appear with you at the hearing prepared to proceed. You can request an earlier hearing in writing.

Failure to appear at your hearing except for exceptional circumstances may result in one or more of the following actions: (1) You may be taken into custody by the Department of Homeland Security and held for further action. OR (2) Your hearing may be held in your absence under section 240(b)(5) of the Immigration and Nationality Act. An order of removal will be entered against you if the Department of Homeland Security established by clear, unequivocal and convincing evidence that a) you or your attorney has been provided this notice and b) you are removable.

IF YOUR ADDRESS IS NOT LISTED ON THE NOTICE TO APPEAR, OR IF IT IS NOT CORRECT, WITHIN FIVE DAYS OF THIS NOTICE YOU MUST PROVIDE TO THE IMMIGRATION COURT PHILADELPHIA, PA THE ATTACHED FORM EOIR-33 WITH YOUR ADDRESS AND/OR TELEPHONE NUMBER AT WHICH YOU CAN BE CONTACTED REGARDING THESE PROCEEDINGS. EVERYTIME YOU CHANGE YOUR ADDRESS AND/OR TELEPHONE NUMBER, YOU MUST INFORM THE COURT OF YOUR NEW ADDRESS AND/OR TELEPHONE NUMBER WITHIN 5 DAYS OF THE CHANGE ON THE ATTACHED FORM EOIR-33. ADDITIONAL FORMS EOIR-33 CAN BE OBTAINED FROM THE COURT WHERE YOU ARE SCHEDULED TO APPEAR. IN THE EVENT YOU ARE UNABLE TO OBTAIN A FORM EOIR-33, YOU MAY PROVIDE THE COURT IN WRITING WITH YOUR NEW ADDRESS AND/OR TELEPHONE NUMBER BUT YOU MUST CLEARLY MARK THE ENVELOPE "CHANGE OF ADDRESS." CORRESPONDENCE FROM THE COURT, INCLUDING HEARING NOTICES, WILL BE SENT TO THE MOST RECENT ADDRESS YOU HAVE PROVIDED, AND WILL BE CONSIDERED SUFFICIENT NOTICE TO YOU AND THESE PROCEEDINGS CAN GO FORWARD IN YOUR ABSENCE.

A list of free legal service providers has been given to you. For information regarding the status of your case, call toll free 1-800-898-7180 or 240-314-1500. For information on Immigration Court procedures, please consult the Immigration Court Practice Manual, available at www.usdoj.gov/eoir.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL (M) PERSONAL SERVICE (P)
 TO: [] ALIEN [] ALIEN c/o Custodial Officer [] ALIEN's ATT/REP [] DHS
 DATE: 10/24/17 BY: COURT STAFF [cc] [P] V3

EXHIBIT C

Immigration Judge Order Granting Motion to Calendar Individual Hearing

Robert Bond, Esquire

ID: 308371

Law Offices of Robert Bond, Esquire, LLC

11880 Bustleton Avenue, Suite 206

Philadelphia, PA 19116

215-240-7565

215-449-3370 (fax)

rbond@phillylawcenter.com

Counsel for Respondent

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
900 MARKET STREET, SUITE 504
PHILADELPHIA, PA 19107**

In the Matter of:

CHAKAROV, RUSLAN

Respondents

In removal proceedings

)
)
)
)
)
)
)

A#



**Immigration Judge:
TBD**

**Next Hearing:
TBD**

MOTION TO CALENDAR A HEARING

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
900 MARKET STREET, SUITE 504
PHILADELPHIA, PA 19107**

In the Matter of:

CHAKAROV, RUSLAN

Respondents

In removal proceedings

)

)

) A#

)

)

)

)



Motion to Calendar a Hearing

Lead Respondent **CHAKAROV, RUSLAN** through the undersigned counsel, Robert Bond Esq., respectfully move this Court to Calendar the Respondent's Immigration hearing.

The Respondent is in Removal Proceedings since 2017 and still has no hearing date. Prolonged wait and uncertainty as to the date of the hearing put the Respondent under immense psychological pressure.

We thus respectfully ask the court to put the Respondent's case on a trail calendar and to schedule the Respondent's hearing to the closest available date.

WHEREFORE, the Respondent prays the Honorable Immigration Judge allows the Motion to calendar the hearing be granted.

Respectfully submitted this 03/10/2023.

A handwritten signature in black ink, appearing to read 'R Bond', is written above a horizontal line.

Robert Bond, Esq.

CHAKAROV, RUSLAN

A# 

PROOF OF SERVICE

On 03/10/2023, I, Robert Bond, Esq., caused to serve a copy of the Motion to Calendar a Hearing, and all attached documents on U.S. DHS / Office of the Chief Counsel at the following address:

Office of the Principal Legal Advisor, Philadelphia

900 Market Street, Suite 346

Philadelphia, PA 19107

Electronically via DHS E-service portal.



(Signature)

03/10/2023

(Date)

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
900 MARKET STREET, SUITE 504
PHILADELPHIA, PA 19107**

In the Matter of:

CHAKAROV, RUSLAN

Respondents

In removal proceedings

)

)

) A#

)

)

)

)



ORDER OF THE IMMIGRATION JUDGE

Upon consideration of the Motion to Calendar a Hearing, it is decided that the motion be

☐ **GRANTED** ☐ **DENIED**

- ☐ DHS does not oppose the motion.
- ☐ The Respondent does not oppose the motion.
- ☐ A response to the motion has not been filed with the court.
- ☐ Good cause has been established for the motion.
- ☐ The court agrees with the reasons stated in the opposition to the motion.
- ☐ The motion is untimely per _____.
- ☐ Other:

Deadlines:

- ☐ The application(s) for relief must be filed by _____.
- ☐ The Respondent must comply with DHS biometrics instructions by _____.

Date: _____

United States Immigration Judge

Certificate of Service

This document was served by: ☐ Mail ☐ Personal Service

To: ☐ Alien ☐ Alien c/o Custodial Officer ☐ Alien's Atty/Rep ☐ DHS

Date: _____ By: Court Staff: _____

Attachments: ☐ EOIR-33 ☐ EOIR-28 ☐ Legal Services List ☐ Other

EXHIBIT D

Bucks County Court of Common Pleas Criminal Docket Summary

EXHIBIT E

Magisterial District Court Summary

EXHIBIT F

ICE/DHS Reporting Requirements Sheet for Adilet Akmatbekov

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE

Event Number: File No.: 

Date: September 27, 2017

Name: AKMATBEKOV, ADILET

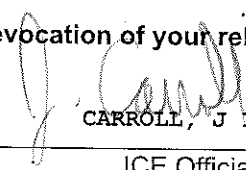
You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

- ☒ You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.
- ☒ You must surrender for removal from the United States if so ordered.
- ☒ You must report in (writing) (person) to Duty officer at See I-831 on 10/04/2017 09:00 as directed.

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

- ☒ You must not change your place of residence without first securing written permission from the officer listed above.
- ☒ You must not violate any local, State or Federal laws or ordinances.
- ☒ You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.
- ☐ Other: *Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the Department of Homeland Security. Electronic monitoring is a requirement and a curfew may be imposed. Failure to comply with the conditions of your release or the requirements of the ATD program may result in a redetermination of your release conditions or your arrest and detention.*
- ☐ See attached sheet containing other specified conditions (Continue on separate sheet if required)

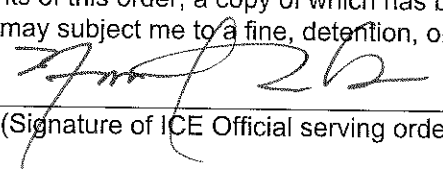
NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by Immigration and Customs Enforcement.

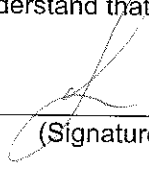

 CARROLL, J 1005

ICE Official

Alien's Acknowledgement of Conditions of Release under an Order of Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the Russian language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.


 (Signature of ICE Official serving order)


 (Signature of Alien)

09/27/2017

Date

I hereby cancel this order of release because:

- ☐ The alien failed to comply with the conditions of release. ☐ The alien was taken into custody for removal.

(Signature of ICE Official canceling order)

Date

Ex. F-001

Alien Name AKMATBEKOV, ADILET	Picture 	Right Index Print
File Number 		
Date September 27, 2017		
Alien's Signature 		
Alien's Telephone Number (if any) 		
Alien's Address c/o Miran Azykov Philadelphia PENNSYLVANIA, 19111		

[illegible]

Ex. F-002

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs EnforcementORDER OF RELEASE ON RECOGNIZANCE
ADDENDUM

File No.:

Date: September 27, 2017Name: AKMATBEKOV, ADILET

- ☒ That you do not associate with known gang members, criminal associates, or be associated with any such activity.
- ☐ That you register in a substance abuse program within 14 days and provide ICE with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a counselor.
- ☐ That you register in a sexual deviancy counseling program within 14 days and provide ICE with written proof of such within 30 days. You must provide ICE with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.
- ☐ That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency(s) and provide ICE with written proof of such within 10 days.
- ☒ That you do not commit any crimes while on this Order of Release on Recognizance.
- ☐ That you report to any parole or probation officer as required within 5 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.
- ☐ That you continue to follow any prescribed doctor's orders whether medical or psychological including taking prescribed medication.
- ☒ That you provide ICE with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.
- ☒ That you provide ICE with written responses from the Embassy or Consulate regarding your request.
- ☒ Any violation of the above conditions will result in revocation of your employment authorization document.
- ☒ Any violation of these conditions may result in you being taken into ICE custody and you being criminally prosecuted.
- ☐ Other;

X

Alien's Signature

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs EnforcementORDER OF RELEASE ON RECOGNIZANCE
OUT-PROCESSING CHECKLIST**Sex Offenders**

- ☐ Probation/Parole Officer Notified
- ☐ Registered as sex-offender as required by state statute within 7 days
- ☐ Victim/Witness Coordinator Notified
- ☐ Victim/Witness Notified
- ☐ Written Proof of Counseling

Substance Abusers

- ☐ Probation/Parole Officer Notified
- ☐ Written Proof of Counseling

All Aliens

- ☐ Probation/Parole Officer Notified
- ☐ Obtain address where living and telephone number
- ☐ Enter into IDENT FINS#: 1233579408
- ☐ NCIC Check
- ☐ Travel Document Application
- ☐ Other: _____

Completed By

Deportation Officer: ALOZIE, I 4603

Date 09/27/2017

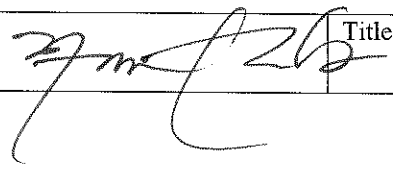
Concurrence By

Supervisory Detention and Deportation Officer: CARROLL, J 1005

Date 09/27/2017

U.S. Department of Homeland Security

Continuation Page for Form I-220A

Alien's Name AKMATBEKOV, ADILET	File Number 	Date 09/27/2017
LOCATION OF ICE OFFICE WHICH YOU REPORT TO ----- ICE/DHS 114 N 8th Street Philadelphia, PA 19107 215-656 7162		
Signature  I 4603 ALOZIE		
Title Deportation Officer		

5 of 5 Pages

EXHIBIT G

EOIR Individual Hearing Notice for Adilet Akmatbekov

EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW

(/)

e-Info



(/)

My Cases
(/cases)

My
Calendar
(/calendar)

My Bonds
(/bonds/bondsearch)

View My
Uploads
(/document/uploads)

What's
New!!!
(<https://www.justice.gov/eoir/internet-immigration-info>)

Guidelines

Document
Upload
Guidelines
(/Static/DocumentUploadRules.html)

Document
Download
Guidelines
(/Static/DocumentDownloadRules.html)

For
Technical
Support
or
General

Feedback

Email:
EOIR-technicalsupport@ice.dhs.gov

🏠 / My Cases (/cases) / Case Details

My Case Details

**Alien
Number**



**Charging
Doc. Date**

09/26/2017

Alien Name

AKMATBEKOV, ADILET

**Immigration
Court
(administrative
control
location)**

IMMIGRATION
COURT
900 MARKET
STREET, SUITE 504
PHILADELPHIA, PA
19107

Case Status

Pending

**Clock
(disclaimer)**

267 days

Case Status - Immigration Court

IJ The case is
Decision: pending.
Hearing 900 MARKET
Location: STREET, SUITE 504
PHILADELPHIA, PA
19107

Future Hearing Information

Hearing Type	Hearing Date	Hearing Location	IJ Assigned
Individual	08/10/2020 (09:00 AM - 12:00 PM)	900 MARKET STREET, SUITE 504 PHILADELPHIA, PA 19107	STEVEN A. MORLEY

Proceeding Information

#	Decision Date	IJ Decision	Immigration Court (Administrative Control Location)
---	---------------	-------------	---

Phone: 1-877-388-3842

Details	1	N/A	The case is pending.	900 MARKET STREET, SUITE 504 PHILADELPHIA, PA 19107

Additional Case Information			
Charging Doc. Date	Hearing Location	Status	BIA Case Exists
No additional case information available			

DD Appeal Information						
Alien Number	Beneficiary / Applicant Name	DD Appeal Type	Date Appeal Filed at DHS	Date Appeal Received at BIA	BIA Decision Date	Link to BIA Decision
No DD appeals found						

PROOF OF SERVICE

I, Robert Bond, Esq., hereby certify that on April 01, 2026, I caused a true and correct copy of the foregoing Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241, Memorandum of Law in Support, Emergency Motion for Temporary Restraining Order, Proposed Order, and this Exhibit Package to be served upon the following by U.S. Mail, First Class, postage prepaid:

Warden, Federal Detention Center Philadelphia

700 Arch Street

Philadelphia, PA 19106

Via U.S. Mail, First Class

ERO Field Office Director, Philadelphia

114 North 8th Street

Philadelphia, PA 19107

Via U.S. Mail, First Class

Todd Lyons, Acting Director, ICE

500 12th Street SW

Washington, DC 20536

Via U.S. Mail, First Class

Markwayne Mullin, Secretary, DHS

245 Murray Lane SW

Washington, DC 20528

Via U.S. Mail, First Class

U.S. Department of Homeland Security

245 Murray Lane SW

Washington, DC 20528

Via U.S. Mail, First Class

Pamela Bondi, Attorney General

950 Pennsylvania Avenue NW

Washington, DC 20530

Via U.S. Mail, First Class

U.S. Attorney's Office, Eastern District of Pennsylvania

615 Chestnut Street, Suite 1250

Philadelphia, PA 19106

Via U.S. Mail, First Class

Respectfully submitted,

/s/ Robert Bond, Esq.

Robert Bond, Esq.

PA Bar ID: 308371

Law Offices of Robert Bond, LLC

11880 Bustleton Ave #206

Philadelphia, PA 19116

Phone: (215) 240-7565

Email: Rbond@phillylawcenter.com