UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MIGUEL ANGEL ANDRADEZ MATERAN,

Petitioner,

v.

RAUL MALDONADO, *et al.*,

Respondents.

Case No. 26-cv-3185 (NJC)

DECLARATION OF ASSISTANT FIELD OFFICE DIRECTOR BRYAN FLANAGAN

Pursuant to 28 U.S.C. § 1746, I, Bryan Flanagan, hereby declare under penalty of perjury that the following is true and correct:

1. I am an Assistant Field Office Director at U.S. Immigration and Customs Enforcement ("ICE") within the U.S. Department of Homeland Security ("DHS"). I currently oversee ERO New York City's Long Island sub-office located in Central Islip, New York. In that capacity, I oversee ICE personnel involved in the identification and apprehension of aliens present in the U.S. without legal status, and I am familiar with certain DHS procedures relating to the processing, removal, and detention of aliens as well as ICE records and databases.

2. I have prepared this declaration in connection with a Petition for a Writ of Habeas Corpus filed by Miguel Angel Andradez Materan ("Petitioner"), a native and citizen of Venezuela, who has been assigned alien number [redacted].

3. The following representations are based on my personal knowledge, and my review of records maintained by DHS in the ordinary course of business.

4. Based on my review of the Form I-213 issued in this case, a true and accurate copy of which is attached hereto as Exhibit A, on May 4, 2026, ICE was apprised by Nassau County Police Department that the Petitioner had been apprehended in a criminal matter. ICE was provided

with pedigree information by the Nassau County Police Department, which ICE used to conduct record checks on the Petitioner. According to the I-213, record checks revealed the Petitioner lacked lawful status in the United States, and his criminal interactions qualified as violations of his Order of Release on Recognizance, Form I-220A. These facts provided probable cause to issue a Form I-200 Warrant for Arrest of Alien. As such, a warrant was issued and ICE officers were dispatched to the Nassau County Police Department, 4th Precinct. When ICE personnel arrived, Petitioner was encountered, and he was identified through a series of pedigree questions. Having identified the petitioner, and having a warrant for his arrest, ICE detained Petitioner. .

5. On May 4, 2026, ICE personnel were not in possession of the Petitioner's physical A-file as he had not been targeted for arrest by Long Island – Central Islip ICE prior to the notification from Nassau County Police Department, but ICE's electronic records, including a digitized version of past Form I-213 issued on October 1, 2023, relating to the Petitioner showed that the Petitioner had been previously encountered by Customs and Border Protection in 2023 and that an Order of Release on Recognizance Form I-220A had been issued permitting the Petitioner's release upon certain conditions. A true and correct copy of the I-220A was previously provided. *See* Docket Entry 11-1, Exh. B. A true and correct copy of the October 1, 2023, I-213 is attached here as Exhibit B.

6. Based on my experience and knowledge of standard DHS practices, Form I-220As issued at the border include conditions of release, including but not limited to the requirement that he not violate any state, federal, or local laws.

7. On May 4, 2026, I was apprised by my subordinate of the Petitioner's criminal arrests since entering the United States. At approximately 7:02 p.m. on May 4, 2026, I cancelled the Petitioner's release on recognizance by signing a letter to the file on ICE letterhead

memorializing said cancellation, which is the procedure when ICE personnel are not in possession of the physical Form I-220A for operational reasons. A true and correct copy of that letter is attached as Exhibit C.

I hereby declare under penalty of perjury that the above statements are true and correct.

Executed at Central Islip, New York.
This 2nd day of June, 2026.

BRYAN J FLANAGAN
Digitally signed by BRYAN J FLANAGAN
Date: 2026.06.02 12:21:02 -04'00'

Bryan Flanagan
Assistant Field Office Director
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security