

Komitee, J

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

YIBO PAN,

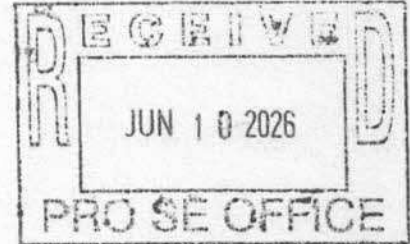
A# [REDACTED]

Petitioner,

v.

WARDEN OF METROPOLITAN DETENTION CENTER BROOKLYN,
NEW YORK FIELD OFFICE DIRECTOR, U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Respondents.



PETITION FOR WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241

I, YIBO PAN, respectfully submit this Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and state the following:

I. INTRODUCTION

1. I am currently detained by U.S. Immigration and Customs Enforcement ("ICE") at the Metropolitan Detention Center ("MDC") in Brooklyn, New York.
2. I respectfully seek relief from continued immigration detention that violates my rights under the Due Process Clause of the Fifth Amendment to the United States Constitution.
3. My immigration proceedings are currently pending before the Immigration Court, and I continue to pursue my asylum claim through lawful legal procedures.
4. Despite the existence of a stable release plan, strong family support, legal representation, and the absence of dangerousness, I remain detained without having received a meaningful individualized custody review before a neutral decision-maker.
5. I respectfully request that this Court order my release under reasonable conditions, or alternatively order a prompt individualized custody hearing.

II. JURISDICTION AND VENUE

6. This Court has jurisdiction pursuant to 28 U.S.C. § 2241 because I am in custody under authority of the United States and challenge the legality of my continued detention.
7. This Court also has jurisdiction pursuant to 28 U.S.C. § 1331 because this action arises under the Constitution and laws of the United States.
8. Venue is proper in the Eastern District of New York because I am currently detained within this District at MDC Brooklyn.

III. PARTIES

REC'D IN PRO SE OFFICE
JUN 10 '26 PM12:13

9. Petitioner YIBO PAN is a native and citizen of China currently detained by ICE at MDC Brooklyn.
10. Respondent Warden of Metropolitan Detention Center Brooklyn is responsible for Petitioner's immediate physical custody.
11. Respondent New York Field Office Director of U.S. Immigration and Customs Enforcement is responsible for immigration detention decisions relating to Petitioner.

IV. FACTUAL BACKGROUND

12. I entered the United States seeking safety and protection because of problems related to my Christian faith and religious activities in China.
13. I filed an asylum application in the United States, and my asylum case remains pending before the Immigration Court.
14. In or around May 2026, I was taken into ICE custody and remain detained.
15. I am currently detained at MDC Brooklyn under ICE authority.
16. To my knowledge, I have not received a meaningful individualized custody hearing before a neutral decision-maker regarding whether my continued detention is necessary.
17. Prior to being taken into custody, I had been participating in the Intensive Supervision Appearance Program ("ISAP") and complied with reporting requirements imposed by immigration authorities.
18. Before my detention, I received instructions directing me to report in person for a scheduled appointment. Prior to appearing, I contacted the reporting office and understood that the appointment was part of a normal reporting process. I nevertheless appeared as instructed because I intended to comply fully with immigration requirements and procedures.
19. I understand the importance of complying with immigration laws and court procedures.
20. If released, I will attend all future Immigration Court hearings, ICE check-ins, attorney meetings, and any other required appointments.
21. I currently have legal counsel assisting me in my immigration proceedings.
22. I am not a danger to the community. I do not have a history of violence and have always attempted to live peacefully and respectfully toward others.
23. Before my detention, I worked and maintained strong ties within my church and community.
24. My Christian faith is an important part of my life, and before detention I regularly participated in church activities.
25. I have strong family support in the United States. If released, I will reside with my sister, FAN PAN, who is willing to provide me with stable housing, transportation assistance, supervision, and emotional support during the pendency of my immigration proceedings.
26. I do not intend to flee or avoid immigration proceedings. I wish to continue pursuing my asylum case through lawful procedures.
27. My continued detention has caused substantial emotional hardship and has interfered with my ability to communicate with family members, prepare my immigration case, and practice my religion normally.
28. I have attempted to pursue available avenues to seek release from detention, yet meaningful custody review has not been provided.

V. CLAIM FOR RELIEF

Violation of the Due Process Clause of the Fifth Amendment

29. I repeat and incorporate by reference all preceding paragraphs as if fully set forth herein.
30. The Fifth Amendment prohibits the federal government from depriving any person of liberty without due process of law.
31. Continued immigration detention without meaningful individualized custody review violates due process where a detainee is not dangerous and does not present a significant flight risk.
32. I have not been provided a constitutionally adequate opportunity to seek release before a neutral decision-maker.
33. Less restrictive alternatives to detention are available, including release under supervision, reporting requirements, electronic monitoring, or other reasonable conditions.
34. My continued detention under these circumstances violates the Due Process Clause of the Fifth Amendment.

VI. REQUEST FOR RELIEF

WHEREFORE, I respectfully request that this Court:

- A. Grant this Petition for Writ of Habeas Corpus;
- B. Order my immediate release from immigration detention under reasonable conditions; or alternatively,
- C. Order Respondents to provide a prompt individualized custody hearing before a neutral decision-maker;
- D. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

YIBO PAN

YIBO PAN

At 

Metropolitan Detention Center Brooklyn
Brooklyn, New York

c/o Law Office of Michael Kamen
3808 Union Street, Suite 8B 102

Flushing, NY 11354

Date: May 25, 2026

Cover letter

May 26, 2026

The Pro Se Office
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ JUN 10 2026 ★

BROOKLYN OFFICE

Re: Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241
Petitioner: YIBO PAN

A# [REDACTED]

Dear Clerk:

Please accept the enclosed Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, together with supporting declarations, exhibits, and Certificate of Service, for filing.

Also enclosed is the required \$5.00 filing fee.

Please send all future correspondence regarding this matter to the following mailing address:

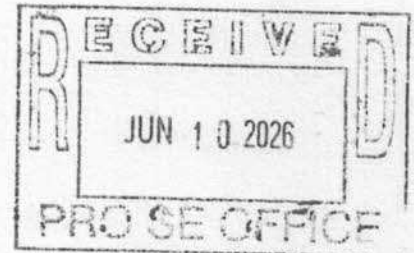
YIBO PAN
c/o Law Office of Michael Kamen
3808 Union Street
Suite 8B
Flushing, NY 11354

Thank you for your attention to this matter.

Respectfully submitted,

YIBO PAN
YIBO PAN

A# [REDACTED]



REC'D IN PRO SE OFFICE
JUN 10 '26 PM12:13

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

YIBO PAN,
A# 246-874-614,

Petitioner,

v.

WARDEN OF METROPOLITAN DETENTION CENTER BROOKLYN,
NEW YORK FIELD OFFICE DIRECTOR, U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Respondents.

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2. Declaration of YIBO PAN
3. Declaration of FAN PAN, sister of Yibo Pan with ID
4. Employer Support Letter
5. Letter from US. Church and baptism certificate
6. Exhibit A – ICE Detainee Locator Printout
7. Exhibit B – Notice to Appear (NTA)
8. Exhibit C – Immigration Court Hearing Notice
9. Exhibit D – ISAP Reporting Messages and Appointment Instructions
10. Pan, Yibo's Tax return tax form of year 2025 and 2024
11. Pan, Yibo's sister's tax return form of year 2025
12. Certificate of Service

Mailing Address for Petitioner:

YIBO PAN
c/o Law Office of Michael Kamen
3808 Union Street
Suite 8B
Flushing, NY 11354

DECLARATION OF YIBO PAN
IN SUPPORT OF PETITION FOR WRIT OF HABEAS
CORPUS

I, YIBO PAN (A# ) hereby declare under penalty of perjury that the following statements are true and correct to the best of my knowledge:

1. My name is YIBO PAN. I am currently detained by U.S. Immigration and Customs Enforcement (ICE) at the Metropolitan Detention Center (MDC) in Brooklyn, New York.
2. I submit this declaration in support of my Petition for Writ of Habeas Corpus seeking release from continued immigration detention while my removal proceedings remain pending before the Immigration Court.
3. I entered the United States seeking safety and protection because of problems related to my Christian faith and religious activities in China. My asylum case remains pending before the Immigration Court, and I wish to continue pursuing my claims through the legal process.
4. I understand the importance of complying with

immigration laws and court procedures. I intend to attend all future immigration court hearings, ICE check-ins, attorney meetings, and any other required appointments if I am released from custody.

5. I currently have legal counsel representing me in my immigration proceedings, and I remain committed to resolving my case through lawful procedures.

6. I do not believe I am a danger to the community. I have no history of violence and have always tried to live peacefully and respectfully toward others.

7. Before my detention, I worked and maintained strong ties within my community and church. My Christian faith is an important part of my life, and I regularly participated in church activities before being detained.

8. If released from custody, I will reside with my sister, FAN PAN, who is willing to provide me with stable housing, transportation assistance, emotional support, and supervision during the pendency of my immigration case.

9. I do not intend to flee or avoid immigration proceedings. I have strong family and community ties in the United States, including my sister and church community. I also have legal counsel assisting me with my case.

10. My continued detention has caused me significant emotional stress and hardship. Being detained has made it difficult for me to communicate with family members, assist in preparing my immigration case, and practice my faith normally.

11. To my knowledge, I have not been provided with a meaningful opportunity to seek release before a neutral decision-maker despite my lack of dangerousness and the existence of a stable release plan.

12. I respectfully request that the Court grant my Petition for Writ of Habeas Corpus and order my release from custody under reasonable conditions while my immigration proceedings continue.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

YIBO PAN

YIBO PAN

A#



Date: May 24, 2026

DECLARATION OF FAN PAN
IN SUPPORT OF PETITION FOR WRIT OF HABEAS
CORPUS

I, FAN PAN, hereby declare under penalty of perjury that the following statements are true and correct to the best of my knowledge:

1. My name is FAN PAN, and I am the sister of YIBO PAN (A#  I submit this declaration in support of my brother's Petition for Writ of Habeas Corpus seeking release from continued immigration detention.
2. I have maintained a close relationship with my brother throughout our lives. I am deeply concerned about his continued detention and the emotional and psychological hardship it has caused him and our family.
3. My brother is currently detained by Immigration and Customs Enforcement (ICE) at the Metropolitan Detention Center (MDC) in Brooklyn, New York. Since his detention, our family has experienced significant stress and anxiety.
4. My brother is not a danger to the community. He has always been a peaceful, respectful, and hardworking person. To my knowledge, he has no history of violence or dangerous behavior.

5. My brother has long maintained Christian beliefs and regularly participated in church activities both before and after arriving in the United States. Our family was raised in a Christian household in China, and I understand that he experienced difficulties in China related to his religious beliefs and participation in Christian gatherings.
6. Before his detention, my brother worked hard to support himself and tried to live responsibly and peacefully. He also maintained strong relationships with family members, church members, and people in the community.
7. If my brother is released from custody, he will reside with me at my residence. I am fully willing to provide him with stable housing, food, transportation, emotional support, and supervision while his immigration proceedings remain pending.
8. I am also willing to help ensure that my brother attends all immigration court hearings, ICE check-ins, attorney meetings, and any other appointments required by the government. I understand the seriousness of immigration proceedings and will encourage him to comply with all release conditions.
9. I do not believe my brother presents any flight risk. He has

legal counsel representing him, a pending immigration case before the Immigration Court, and strong family and community ties in the United States.

10. My brother's continued detention has caused serious hardship to our family. It has limited his ability to communicate with loved ones, participate in religious activities, and assist in preparing his immigration case.

11. Based on my knowledge of my brother's character, family support system, and stable release plan, I respectfully believe that continued detention is unnecessary and that he may safely remain in the community while his immigration proceedings continue.

12. I respectfully request that the Court grant his Petition for Writ of Habeas Corpus and order his release under reasonable conditions.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

FAN PAN

FAN PAN

Sister of YIBO PAN

05/25/2026

Employer Statement

I am a manager at TAIWANESE CUISINE, INC. (company/restaurant name). YIBO PAN previously worked at our business. He was responsible, followed workplace rules, and got along well with coworkers. I did not witness any violent or dangerous behavior from him.

To the best of my knowledge, he did not present any danger to others or the community. I believe that if released, he would continue to comply with required procedures and arrangements.

These statements are true and based on my personal knowledge.

Name: ALVIN CHEN

Title: GENERAL MANAGER

Company Name: TAIWANESE CUISINE, INC.

Date: MAY 24, 2026





**U.S. Immigration
and Customs
Enforcement**

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Facility Page

Detention Information For:

YIBO PAN

Country of Birth: China, Peoples Republic of

A-Number: 

Current Detention Facility:

BROOKLYN MDC

80 29th Street

Brooklyn, NY 11232

Visitor Information: (718) 840-4200

ERO Office Information

Family members and legal representatives may be able to obtain additional information about this individual's case by contacting this ERO office:

**VARRICK, NY, SERVICE PROCESSING
CENTER (DOCKET CONTROL OFFICE)**

Phone Number: (212) 863-3401

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Related Information

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纽约生命河靈糧堂
River of Life Christian Church

143-08 45th Ave., Flushing, NY 11355 Tel/Fax: (718) 888-7220 Email: ruth.lin.rolcc@gmail.com

May 25, 2026

Dear Sir/Madam:

My name is Jeffrey Jian H. Wu. I am the office administrator of the River of Life Christian Church in New York.

I would like to confirm that brother Yi Bo Pan is our church member. He was baptized in our church on March 27, 2024.

The following is the summary of his attendance of activities. The attendance from 1/21/24 to 7/15/24 is based on his attendance record cards, the attendance from 7/22/24 to 4/19/26 is estimated based on his Sunday donation records.

Year	Sunday Worship (number of times)	Cell Group Meeting (number of times)
2026	6	---
2025	28	---
2024	39	25+

Please contact me at  or email me at JWu_2000@hotmail.com if you have any other questions.

Sincerely yours,



Jeffrey Jian H. Wu
Office Administrator