United States Department of Justice

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June 17, 2026

Hon. Anne M. Nardacci
United States District Judge
James T. Foley U.S. Courthouse
445 Broadway
Albany, NY 12207

RE: *Sisalema Rea v. Ball, et al.*
Civil Action No. 9:26-cv-01247

Dear Judge Nardacci:

I represent the Federal Respondents in the above-captioned action. Today, at approximately 4:40 p.m., this Court issued an order that, *inter alia*, enjoins Respondents from transferring Petitioner outside the Northern District of New York until the civil matter is resolved. I write to inform the Court that Petitioner began transfer to the Buffalo Federal Detention Facility ("BFDF") at approximately 11:56 a.m.—prior to this Court's order enjoining transfer. Respondents therefore respectfully request, with Petitioner's consent, that the Court modify its Order to permit Petitioner's detention within either the Northern ***or Western*** Districts of New York.

The Court's Order was served on the U.S. Attorney's Office ("USAO") through CM/ECF on June 17, 2026, at approximately 4:40 p.m. Petitioner's counsel provided a copy of the Petition and a filing receipt showing that it was filed at approximately 3:33 p.m. Upon receiving the Order, the USAO promptly notified ICE. ICE advised that Petitioner had already been transferred to BFDF and had departed the Champlain Hold Room in Champlain, New York, at approximately 11:56 a.m.—more than four hours before the Court issued its restriction on transfer and more than three hours before the Petition had been filed. Nevertheless, although Petitioner was likely still traveling within the Northern District of New York when the Petition was filed, Respondents do not intend to contest this Court's jurisdiction over the habeas proceeding.

I have conferred with Petitioner's counsel, who advised that he consents to a proposed modification of the Court's Order to extend the geographic restriction to permit Petitioner to remain at the BFDF within the Western District of New York.

Thank you for your consideration of this request.

Respectfully Submitted,
TODD BLANCHE
Acting Attorney General

JOHN A SARCONE III
First Assistant United States Attorney

By: *s/ Alexis M. Osborne*
Alexis M. Osborne
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