MONTH XX, 202X SENT BY EMAIL

ERO \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

ATT: D.O. \_\_\_\_\_\_\_\_\_\_\_\_\_\_

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\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, CA \_\_\_\_\_\_\_\_\_\_\_

[\_\_\_\_\_\_\_\_\_\_@ice.dhs.gov](mailto:__________@ice.dhs.gov)

[DO individual email][@ice.dhs.gov](mailto:joseph.palakiko@ice.dhs.gov)

**RE: URGENT REQUEST FOR IMMEDIATE RELEASE FROM ICE CUSTODY**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (A# XXX XXX XXX)**

**INDEX OF EXHIBITS**

1. **Form G-28, Notice of Entry of Appearance as Attorney**
2. **A copy of Mr. \_\_\_\_\_\_\_’s [identification] \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**
3. **A letter from \_\_\_\_\_\_\_\_\_\_\_\_ describing his/her desire to sponsor Mr. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**
4. **Evidence of the sponsor’s identity, income, and address:**
5. **Medical Records for Mr. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**
6. **Saadi A, Patler C, Langer P., “Duration in Immigration Detention and Health Harms,” JAMA Netw Open. 2025;8(1):e2456164. doi:10.1001/jamanetworkopen.2024.56164**

Dear Officer \_\_\_\_\_\_\_\_\_\_\_\_\_,

Human Rights First represents Mr. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, a citizen of \_\_\_\_\_\_\_\_, in his custody proceedings. We write to request that Mr. \_\_\_\_\_\_\_\_\_\_\_ be immediately released from ICE custody.

**As a [summary of compelling characteristics] with no criminal history and urgent medical issues, [NAME] merits release** under Section 212(d)(5) of the Immigration and Nationality Act (“INA”), and Section 236(a) of the INA.

**[NAME] MERITS RELEASE UNDER INA § 212(d)(5) FOR URGENT HUMANITARIAN REASONS**

There are urgent humanitarian reasons that merit Mr. LASTNAME’s release from detention. Under INA § 212(d)(5), parole “would generally be justified” for those “who have serious medical conditions in which continued detention would not be appropriate.”

Mr. LASTNAME has been detained for about NUMBER months and isolated from his community. *See Exhibit X,* at ¶ X. Prolonged detention has aggravated the trauma that he endured in his home country, manifesting itself as serious mental and physical health conditions. For example..….. *Id*.

Indeed, studies have found that “increased length of imprisonment…directly exerts harm” and that “detention lasting 6 months of longer…[results in] even higher rates of poor [health], mental illness, and PTSD.” *See Exhibit X.*

**[NAME] IS NOT A FLIGHT RISK**

There is no evidence that Mr. LASTNAME is a flight risk. He is committed to complying with immigration orders and is aware he must appear for all future hearings. *See Exhibit X,* at ¶ X. He has a dedicated sponsor and permanent address where he will reside upon release. *Exhibit X,* at pg. X. He is eligible for relief from removal and he has already filed his application for asylum. Thus, relief from removal is available to Mr. LASTNAME, which incentivizes him to attend future immigration court hearings. *Exhibit X*, at ¶ X.

Mr. LASTNAME connected with his sponsor through \_\_\_\_\_\_\_\_ and is grateful for his help. *Exhibit X*, at ¶ X. Mr. SPONSOR is a former immigrant who knows of Respondent through \_\_\_\_\_\_\_\_. *Exhibit X,* at pg. X. Mr. SPONSOR has provided proof of his U.S. citizenship and is willing to provide for and support Mr. LASTNAME. *Exhibit X,* at pg. X; *Exhibit X,* at pg. X.

Mr. LASTNAME thus is not a flight risk and has every reason to remain in STATE and to appear at all future court hearings. If released, he could work more easily with a pro bono counsel outside of detention with a LANGUAGE interpreter to prepare his asylum case.

**[NAME] IS NOT A DANGER TO THE COMMUNITY**

There is no evidence that Mr. LASTNAME poses a danger to society. *Exhibit X,* at ¶ X. Mr. LASTNAME has no criminal record in the U.S. or in his country of origin. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ has attested to his good moral character and belief that the Respondent will be an upstanding and law-abiding resident of the United States. *See* *Exhibit X*, at pg. X.

The facts demonstrate that Mr. LASTNAME is a gentle family man who would not cause harm to anyone. He has no other convictions, and has never had any dealings with drugs, firearms, or violence. Respondent would thus not be a danger to anyone in his community if he is released from custody. *Exhibit X,* at ¶ X.

**[NAME] IS ELIGIBLE FOR CONDITIONAL PAROLE UNDER INA 236(A)**

Mr. \_\_\_\_\_\_\_\_\_ entered the United States without inspection and is currently in removal proceedings, and is therefore eligible for release on conditional parole under INA.

**[NAME]’s RELEASE PLAN**

If [name] is released, she will have the support of her family. [Name] will live [with whom and where]. *See* Exh. [XX]. [describe other support client will receive from friends and family].

Once released, [name] will comply with all future orders and requirements from ICE and from the Immigration Court, including complying with a removal order, if that is the ultimate outcome of her case.

**IN CONCLUSION, [name] merits discretion as she does not pose a threat to national security, border security, or public safety. As a result, ICE should cancel [name]’s detainer, and [what else you want ICE to do].**

Thank you for your attention to this case. Should you have any questions about this request, please do not hesitate to contact me at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ or \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Sincerely,

**Attorney Name**

Associate Attorney

Refugee Representation

Human Rights First

3680 Wilshire Blvd, Ste P04-414

Los Angeles, CA 90010