

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

G.F.F.,

Petitioner,

v.

LaDeon FRANCIS, New York Field Office
Director for U.S. Immigration and Customs
Enforcement, *et al.*,

Respondents.

No. 25 Civ. 7368 (JGK)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, Respondents respectfully submit this Return, together with the accompanying Memorandum of Law and Declaration of Deportation Officer Michael Charles, in opposition to the Verified Petition for Writ of Habeas Corpus (“Petition”), filed by petitioner G.F.F. (ECF No. 1). The attached documents are taken from G.F.F.’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement.¹

1. Exhibit 1 is a copy of a Determination of Inadmissibility pertaining to G.F.F., dated May 15, 2024.

2. Exhibit 2 is a copy of the Immigration Judge’s Order denying G.F.F. bond, dated January 29, 2025.

The facts contained in these Exhibits and in the Declaration of Deportation Officer Michael Charles, and the law set forth in Respondents’ Memorandum of Law in Opposition to the Petition, establish that G.F.F.’s detention is lawful.

¹ Because G.F.F. has moved for leave to proceed by initials and redact certain other identifying information in this case, ECF No. 3, his name and A-number have been redacted from Respondents’ submissions in opposition to the petition.

WHEREFORE, Respondents respectfully request that the Court enter judgment denying the Petition.

Dated: New York, New York
September 22, 2025

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York
Attorney for Respondents

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