

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

RUBEN ABELARDO ORTIZ-LOPEZ,

Petitioner,

v.

LADEON FRANCIS, *et al.*,

Respondents.

Case No. 25 Civ. 7985 (KPF)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, the Government respectfully submits this Return, together with the accompanying Memorandum of Law in opposition to the Amended Petition for Writ of Habeas Corpus (“Petition”), filed by petitioner Ruben Abelardo Ortiz-Lopez (“Petitioner”) (ECF No. 8), and the Declaration of Supervisory Detention and Deportation Officer Joseph Harrington dated October 7, 2025. The attached documents are taken from Petitioner’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement (“ICE”).

1. Exhibit 1 is a copy of the Warrant for Arrest of Alien (Form I-200) dated March 22, 2024.
2. Exhibit 2 is a copy of the Notice to Appear dated March 22, 2024.
3. Exhibit 3 is a copy of the Order of Release on Recognizance (Form I-220A) dated March 23, 2024.
4. Exhibit 4 is a copy of the Notice of Custody Determination (Form I-286) dated March 22, 2024.
5. Exhibit 5 is a copy of the Program Rules for Petitioner’s Alternatives to Detention (“ATD”) Program dated June 7, 2024.

6. Exhibit 6 is a copy the Program Rules for Petitioner's ATD Program translated into English.

7. Exhibit 7 is a copy of the Warrant for Arrest of Alien (Form I-200) dated September 25, 2025.

8. Exhibit 8 is a copy of the Notice to Terminate ATD Participation (Form 71-018) dated September 25, 2025.

The facts contained in Exhibits 1 through 8, and in the Declaration of Supervisory Detention and Deportation Officer Joseph Harrington dated October 7, 2025, and the law set forth in the Government's Memorandum of Law in Opposition to the Petition, establish that Petitioner's detention is lawful.

WHEREFORE, the Government respectfully requests that the Court enter judgment denying the Petition.

Dated: New York, New York
October 7, 2025

Respectfully submitted,

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

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