

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VICTORIANO RAMOS SAPON,)
Petitioner,)
v.) No. 25 C 11731
KRISTI NOEM, in her official capacity as) Judge Chang
Secretary of Homeland Security, *et al.*,)
Respondents.)

RETURN TO PETITION FOR HABEAS CORPUS

Pursuant to 28 U.S.C. § 2243, the government respondents submit this return, together with their accompanying memorandum of law and the declaration attached thereto, in response to the petition for a writ of habeas corpus of petitioner Victoriano Ramos Sapon, filed on September 26, 2025. Dkt. 1.

1. The attached documents are taken from Sapon's administrative file, as maintained by and provided to this office by U.S. Immigration and Customs Enforcement ("ICE").
2. Exhibit 1 is a copy of Sapon's expedited removal documentation from June 2016.
3. Exhibit 2 is a copy of the United States Department of Homeland Security's ("DHS") reinstatement of Sapon's order of removal, from late-September 2025.
4. The facts contained in Exhibits 1 and 2, the law set forth in the government's contemporaneously filed memorandum in opposition to Sapon's petition, along with the declaration attached thereto, establish that Sapon's detention is lawful.

WHEREFORE, based on the foregoing, the government respectfully requests that the court enter judgment denying petitioner's petition.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

By: s/ Joshua S. Press

JOSHUA S. PRESS
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 886-7625
joshua.press@usdoj.gov