

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

MARIA JOSE TUMBA HUAMANI,

Petitioner,

v.

LADEON FRANCIS, *et al.*,

Respondents.

Case No. 25 Civ. 8110 (LJL)

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 Petition for Writ of Habeas Corpus (“Petition”), filed by petitioner Maria Jose Tumba Huamani (“Petitioner”) (ECF No. 1), and the Declaration of Supervisory Detention and Deportation Officer Christopher Finnie dated October 14, 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 May 7, 2024.
2. Exhibit 2 is a copy of the Notice to Appear dated May 7, 2024.
3. Exhibit 3 is a copy of the Order of Release on Recognizance (Form I-220A) dated May 7, 2024.
4. Exhibit 4 is a copy of the Notice of Custody Determination (Form I-286) dated May 7, 2024.
5. Exhibit 5 is a copy of the Warrant for Arrest of Alien (Form I-200) dated September 30, 2025.

The facts contained in Exhibits 1 through 5, and in the Declaration of Supervisory Detention and Deportation Officer Christopher Finnie dated October 14, 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 14, 2025

Respectfully submitted,

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

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