

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JORDY LOPEZ ZAMORA,

Petitioner,

v.

JUDITH ALMODOVAR, in her official capacity
as Acting Field Office Director, New York Field
Office, U.S. Immigration & Customs Enforcement,
et al.,

Respondents.

No. 25 Civ. 8643 (RA)

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 Jordy Lopez Zamora (ECF No. 1). The attached document is taken from Lopez Zamora’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement.

1. Exhibit 1 is a copy of the Board of Immigration Appeals August 5, 2025 decision dismissing Lopez Zamora’s appeal of the Immigration Judge’s bond decision.

The facts contained in this Exhibit, the Exhibits to the Petition 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 Lopez Zamora’s detention is lawful.

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

Dated: New York, New York
November 5, 2025

Respectfully submitted,

JAY CLAYTON
United States Attorney for the

Southern District of New York
Attorney for Respondents

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