

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

O.G.,

Petitioner,

- against -

LADEON FRANCIS *et al.*,

Respondents.

**RETURN TO HABEAS
PETITION**

No. 25 Civ. 8977 (JAV)

Under 28 U.S.C. § 2243, Respondents respectfully submit this Return, together with the accompanying Memorandum of Law and Declaration of Deportation Officer Mincheol So, in opposition to the Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241 filed by petitioner O.G. (“Petitioner”).¹ 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, and have been redacted to protect Petitioner’s identity.

1. Exhibit 1 is a copy of the Notice to Appear, dated April 8, 2025.
2. Exhibit 2 is a copy of the Warrant for Arrest of Alien, dated April 8, 2025.
3. Exhibit 3 is a copy of the Form I-830, Notice to EOIR: Alien Address filed with the Immigration Court on April 8, 2025, commencing Petitioner’s removal proceeding.
4. Exhibit 4 is a copy of a letter from the Office of the Sullivan County District Attorney, dated April 11, 2025.

¹ The Court has granted Petitioner’s motion to proceed in this case via pseudonym. ECF No. 16.

5. Exhibit 5 is a copy of the U.S. Department of Homeland Security's Submission of Evidence to the Immigration Court to sustain the allegations in the Notice to Appear, dated July 16, 2025.

6. Exhibit 6 is a copy of the Immigration Judge's written decision denying Petitioner's bond request, dated August 8, 2025.

The facts contained in Exhibits 1 through 6 and in the Declaration of Deportation Officer Mincheol So, and the law set forth in the respondents' memorandum of law in opposition to the Petition, establish that Petitioner's detention is lawful.

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

Dated: New York, New York
November 12, 2025

Respectfully submitted,

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

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