

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

VALENTIN ALCANTARA MORALES,	)	
	)	
Petitioner,	)	
	)	
v.	)	No. 25 C 13259
	)	
KRISTI NOEM, in her official capacity as	)	Judge Ellis
Secretary of Homeland Security, <i>et al.</i> ,	)	
	)	
Respondents.	)	

**RETURN TO PETITION FOR HABEAS CORPUS**

Pursuant to 28 U.S.C. § 2243, 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 Valentin Alcantara Morales, filed on October 30, 2025.

Dkt. 1.

1. The attached documents are taken from Morales’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 the United States Department of Homeland Security’s (“DHS”) Notice and Order of Expedited Removal for Morales, from February 11, 2015.

3. Exhibit 2 is a copy of DHS’s Warrant for Removal/Deportation for Morales, from February 16, 2015.

4. Exhibit 3 is a copy of DHS’s Notice of Intent to Reinstate Prior Order of Removal for Morales, from February 16, 2015.

5. Exhibit 4 is a copy of ICE’s Certification of Reinstatement for Morales, from October 29, 2025.

6. Exhibit 5 is a copy of DHS’s Warrant for Arrest of Alien for Morales, dated October 29, 2025.

7. The facts contained in Exhibits 1 through 5, as well as the law set forth in respondents' contemporaneously filed memorandum in opposition to Morales's petition, establish that his detention is lawful.

WHEREFORE, based on the foregoing, respondents respectfully request that the court enter judgment denying the petition.

Respectfully submitted,

ANDREW S. BOUTROS  
United States Attorney

By: s/ Joshua S. Press

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