

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

JORGE LUIS CULCAY VELETANGA,

Petitioner,

-against-

KRISTI NOEM, in her Official Capacity as the  
Secretary of the U.S. Department of Homeland  
Security, *et al.*,

Respondents.

No. 25 Civ. 9211 (NSR)

**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 ECF No. 1 (“Petition”), filed by petitioner Jorge Luis Culcay Veletanga (“Petitioner”), and the Declaration of Deportation Officer Mincheol So, dated December 22, 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”). The below exhibits are true and correct copies of these documents maintained by ICE.

1. Exhibit 1 is a Putnam County Sheriff’s Office’s notification to ICE regarding Petitioner, dated September 6, 2025, with minor redactions to certain personal information of Petitioner.
2. Exhibit 2 is a Warrant of Arrest for Alien (Form I-200), dated September 8, 2025.
3. Exhibit 3 is a Record of Deportable/Inadmissible Alien (Form I-213), dated September 8, 2025, with minor redactions to certain personal information of Petitioner.
4. Exhibit 4 is a Notice to Appear (Form I-862), dated September 8, 2025, with minor redactions to certain personal information of Petitioner.

5. Exhibit 5 is a RAP Sheet for Petitioner, dated September 10, 2025, with minor redactions to certain personal information of Petitioner.
6. Exhibit 6 contains documents related to Petitioner's 2015 robbery charge.
7. Exhibit 7 contains documents related to Petitioner's 2016 criminal possession of stolen property charge.
8. Exhibit 8 is the Immigration Court's Order dated October 17, 2025, in Petitioner's immigration case.

The facts contained in Exhibits 1 through 8, and in the So Declaration, 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  
December 22, 2025

Respectfully submitted,

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

By: /s/ Jennifer Jude  
JENNIFER JUDE  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (212) 637-2663  
E-mail: jennifer.jude@usdoj.gov