

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YANGCHUN WANG,

Petitioner,

v.

KENNETH GENALO, *et al.*,

Respondents.

Case No. 25 Civ. 9460 (JGK)

**RETURN TO HABEAS
PETITION**

Under 28 U.S.C. § 2243, the government respectfully submits this Return together with the government's letter dated November 28, 2025, and the Declaration of Mincheol N. So, dated November 28, 2025, in opposition to the Petition for Writ of Habeas Corpus ("Petition"), filed by petitioner Yangchun Wang ("Petitioner") (ECF No. 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.

1. Exhibit A is a Form I-862, Notice to Appear, dated November 12, 2025.
2. Exhibit B is a Form I-213, Record of Deportable/Inadmissible Alien, dated November 12, 2025.
3. Exhibit C is a Form I-200, Warrant of Arrest of Alien, dated November 12, 2025.

The facts contained in Exhibits A through C, in the Declaration of Mincheol N. So, and in the government's letter dated November 28, 2025, incorporating by reference prior briefing on the issues raised by Petitioner in 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
November 28, 2025

Respectfully submitted,

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

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