UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARVIN OBDULIO QUINTEROS MORAN,

Petitioner,

-against-

WILLIAM JOYCE, Acting New York City Field Office Director, *et al.*,

Respondents.

No. 25 Civ. 9645 (GBD)

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. 5 ("Petition"), filed by petitioner Marvin Obdulio Quinteros Moran ("Petitioner"), and the Declaration of Deportation Officer Mincheol So, dated December 2, 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 Form I-213, Record of Deportable/Inadmissible Alien, dated July 5, 2013, with Petitioner's FBI number redacted.

2. Exhibit 2 is a Form I-860, Notice of Order of Expedited Removal, dated July 5, 2013.

3. Exhibit 3 is a Form I-286, Notice of Custody Determination, dated July 23, 2013.

4. Exhibit 4 is a Form I-862, Notice to Appear, dated July 23, 2013.

5. Exhibit 5 is a Form I-200, Warrant for Arrest of Alien, dated August 5, 2025.

6. Exhibit 6 is a Form I-247A, Immigration Detainer - Notice of Action, dated August 5, 2025.

7. Exhibit 7 is a Form I-200, Warrant for Arrest of Alien, dated November 16, 2025.

8. Exhibit 8 is a Form I-213, Record of Deportable/Inadmissible Alien, dated November 16, 2025, with Petitioner's FBI number redacted.

9. Exhibit 9 contains four Certificates of Disposition from Queens Criminal Court, related to Petitioner, all dated July 20, 2023.

10. Exhibit 10 is Petitioner's RAP sheet as of the date of request, November 25, 2025, with Petitioner's FBI number redacted.

The facts contained in Exhibits 1 through 10, 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 2, 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