

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YOHANDRY JOSE CASTRO CONEO,

Petitioner,

v.

JUDITH ALMODOVAR, *et al.*,

Respondents.

No. 25 Civ. 9850 (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 (“Petition”), filed by petitioner Yohandry Jose Castro Coneo (Dkt. 1), and the Declaration of Deportation Officer Michael Charles dated December 15, 2025. Produced from Petitioner’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement, are the following documents:

1. **Exhibit A** is a copy of the Notice to Alien Ordered Removed (Form I-296) dated March 4, 2024.
2. **Exhibit B** is a copy of the Notice and Order of Expedited Removal (Form I-860) dated March 4, 2024.
3. **Exhibit C** is a copy of the Alien’s Statement to Border Patrol Agent (Form I-867A) dated March 4, 2024.
4. **Exhibit D** is a copy of the Immigration Judge’s decision and order entered March 8, 2024.
5. **Exhibit E** is a copy of the Notice of Custody Determination (Form I-286) dated March 8, 2024.
6. **Exhibit F** is a copy of the Notice to Appear (Form I-862) dated March 8, 2024.
7. **Exhibit G** is a copy of the Order of Release on Recognizance (Form I-220A) dated March 8, 2024.

8. **Exhibit H** is a copy of the Record of Deportable/Inadmissible Alien (Form I-213) dated March 8, 2024.
9. **Exhibit I** is a copy of the Warrant for Arrest of Alien (Form I-200) dated March 8, 2024.
10. **Exhibit J** is a copy of the Order of Release on Recognizance (Form I-220A) and Alternatives to Detention (“ATD”) Program Enrollment Notice to Alien dated March 9, 2024.
11. **Exhibit K** is a copy of the Warrant for Arrest of Alien (Form I-200) dated November 10, 2025.

The facts contained in Exhibits A through K, the Declaration of Deportation Officer Michael Charles, 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 dismissing the Petition.

Dated: New York, New York
December 15, 2025

Respectfully submitted,

JAY CLAYTON
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