

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ALEXANDER BARROS MILLAN,	)	CASE NO.: 4:25CV2779
	)	
Petitioner,	)	JUDGE CHARLES ESQUE FLEMING
	)	
v.	)	MAGISTRATE JUDGE REUBEN J.
	)	SHEPERD
ED VOORHIES, et al.,	)	
	)	
Respondents.	)	<u>SUPPLIMENTAL RESPONSE TO</u>
	)	<u>PETITION FOR WRIT OF HABEAS</u>
	)	<u>CORPUS</u>

Federal Defendant, Kevin Raycraft, Acting Field Office Director of Enforcement and Removal Operations, Detroit Field Office, Immigration and Customs Enforcement hereby responds to the Court's non-document Order of January 12, 2026 for supplemental documentation in response to the Court's Show Cause Order (ECF No. 3).

Petitioner's parole was terminated effective April 18, 2025. (See Ex. D – updated I-213 and Ex. E – I-797 Revocation Notice). For all the reasons fully set forth in the Response to Petition for Writ of Habeas Corpus (ECF No. 4), Petitioner is an applicant for admission in § 1229a removal proceedings he is thus subject to mandatory detention under 8 U.S.C. § 1225.

Because Petitioner has failed to exhaust administrative remedies and he is properly detained under 8 U.S.C. § 1225(b), the Court should deny Petitioner's habeas petition.

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(F)

Pursuant to 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that this Response to Petition for Writ of Habeas Corpus is one (1) page in length and complies with the page limitations for a matter assigned to the standard track.

/s/Sara E. DeCaro
SARA E. DeCARO