

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GHOLAM ALI AHMADI,

Petitioner,

v.

JUDITH ALMODOVAR, in her official capacity
as Field Office Director of and Enforcement and
Removal Operations, New York City, for U.S.
Immigration and Customs Enforcement, *et al.*,

Respondents.

No. 26 Civ. 274 (VSB)

RETURN TO HABEAS PETITION

Under 28 U.S.C. § 2243, Respondents respectfully submit this Return, together with the accompanying Memorandum of Law and Declaration of Supervisory Detention and Deportation Officer John Tucciarone, in opposition to the Verified Petition for Writ of Habeas Corpus (“Petition”), filed by petitioner Gholam Ali Ahmadi (“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 copy of a Warrant for Arrest of Alien (Form I-200), dated April 19, 2023.
2. Exhibit B is a copy of a Record of Deportable/Inadmissible Alien (Form I-213), dated April 15, 2023.
3. Exhibit C is a copy of a Notice to Appear issued to Petitioner, dated April 20, 2023.
4. Exhibit D is a copy of the Order of Release on Recognizance issued to Petitioner, dated April 20, 2023.
5. Exhibit E is a copy of a Warrant for Arrest of Alien (Form I-200), dated January 13, 2026.

6. Exhibit F is a copy of a Record of Deportable/Inadmissible Alien (Form I-213), dated January 13, 2026.

The facts contained in these Exhibits and in the Declaration of Supervisory Detention and Deportation Officer John Tucciarone, and the law set forth in Respondents' Memorandum of Law in Opposition to the Petition, establish that Petitioner's detention is lawful.

WHEREFORE, Respondents respectfully request that the Court enter judgment denying the Petition.

Dated: New York, New York
January 20, 2026

Respectfully submitted,

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

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