

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GJON MHILLI,

Petitioner,

- v -

LADEON FRANCIS, *et al.*,

Respondents.

No. 26 Civ. 392 (KPF)

**RETURN TO  
HABEAS PETITION**

Under 28 U.S.C. § 2243, Respondents respectfully submit this Return; the Declaration of Supervisory Detention and Deportation Officer Ronald Romero, dated January 20, 2026; and the accompanying Memorandum of Law in Opposition to the Petition for a Writ of Habeas Corpus (“Petition”) filed by Petitioner Gjon Mhilli (ECF No. 1). The attached documents were obtained from Petitioner’s administrative file, as maintained by and provided to this Office by U.S. Immigration and Customs Enforcement (“ICE”).

1. **Exhibit 1** is a Record of Deportable/Inadmissible Alien (Form I-213) concerning Petitioner.
2. **Exhibit 2** is a copy of the Repository Inquiry (*i.e.*, rap sheet) concerning Petitioner.
3. **Exhibit 3** is a copy of records relating to Petitioner’s conviction for assault resulting in serious or aggravated injury.
4. **Exhibit 4** is a copy of the Immigration Court’s oral decision, dated December 7, 2007.
5. **Exhibit 5** is a copy of the Immigration Court’s order, dated May 5, 2008.
6. **Exhibit 6** is a copy of the Board of Immigration Appeals’ (“BIA”) decision, dated March 19, 2010.

7. **Exhibit 7** is a copy of an Order of Supervision (Form I-220B), dated July 21, 2010.
8. **Exhibit 8** is a copy of a Release Notification, dated July 20, 2010.
9. **Exhibit 9** is a copy of a Warrant for Arrest of Alien (Form I-200), dated January 14, 2026.
10. **Exhibit 10** is a copy of a Notice of Revocation of Release, dated January 14, 2026.
11. **Exhibit 11** is a copy of is a copy of a form titled Alien Informal Interview Upon Revocation of Order of Supervision, dated January 14, 2026.
12. **Exhibit 12** is a copy of a Warrant of Removal/Deportation (Form I-205), dated January 14, 2026.
13. **Exhibit 13** is a copy of a Warning to Alien Ordered Removed or Deported (Form I-294), dated January 14, 2026.
14. **Exhibit 14** is a copy of a Warning for Failure to Depart (Form I-229(a)) and Instruction Sheet to Detainee Regarding Requirement to Assist in Removal, dated January 14, 2026.
15. **Exhibit 15** is an undated Online Detainee Locator System Privacy Notice.
16. **Exhibit 16** is a Statement of When Consular Notification Is at the Foreign National's Option, dated January 14, 2026.
17. **Exhibit 17** is a copy of an ERO Delegation Order, dated July 25, 2019.
18. **Exhibit 18** is a copy of the Notice to Appear, dated January 24, 2005.

The facts contained in Exhibits 1 through 18 and in the Declaration of Supervisory Detention and Deportation Officer Ronaldo Romero, 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*

By: /s/ Allison M. Rovner  
Allison M. Rovner  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
(212) 637-2691  
allison.rovner@usdoj.gov