

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

JULIAN ALCON GASPAR,

Petitioner,

9:26-cv-00118(BKS)

v.

FREDERICK J. AKSHAR II, in his official capacity as
Warden of the Broome County Correctional
Facility; PAMELA BONDI, in her official capacity as U.S.
Attorney General; PHILIP RHONEY, in his official capacity
as Deputy Field Office Director, Buffalo Field Office, U.S.
Immigration & Customs Enforcement; TAMMY MARICH,
in her official capacity as Field Office Director, Buffalo Field
Office, U.S. Immigration & Customs Enforcement;
TODD LYONS, in his official capacity as Acting Director,
U.S. Immigration and Customs Enforcement,
KRISTI NOEM, in her official capacity as Secretary of Homeland Security,

Respondents.

**RESPONDENT'S ANSWER TO PETITION
FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241**

FREDERICK J. AKSHAR II
Broome County Sheriff

By: JOSHUA T. TERRELL
Assistant Broome County Attorney
Bar Roll No. 704560

Respondent, FREDERICK J. AKSHAR II, in the above-entitled action, through and by its attorney, Cheryl Sullivan, Broome County Attorney, Joshua T. Terrell, Esq., of counsel, for a verified Answer to the Petition in the above-entitled proceeding, answers the Petition as follows:

1. Respondent ADMITS Petitioner is imprisoned in the Broome County Correctional facility.
2. Respondent lacks sufficient knowledge or information to form a belief as to the truth or falsity of the further allegations contained in paragraphs numbered "1 through 65", of the Petition and therefore denies each and every allegation therein contained.
3. Respondent denies each and every allegation not specifically admitted, controverted, or denied.

As and For a First Objection in Point of Law

1. Petitioner has been ordered detained by Border Patrol Agent Robert Meyer and is being held by the Broome County Correctional Facility in accordance with that Order.
See Exhibit A.

Dated: January 27, 2026
Binghamton, New York

CHERYL SULLIVAN
Broome County Attorney

/s/ Joshua T. Terrell

By:

Joshua T. Terrell, Esq.
Assistant County Attorney II
Broome County Attorney's Office
60 Hawley Street
Binghamton, New York 13901
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VERIFICATION

I affirm this January 27, 2026, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true as to my knowledge and belief, and I understand that this document may be filed in an action or proceeding in a court of law.

/s/ Joshua T. Terrell

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