UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF NEW YORK

SHAUN RICARDO RAMBARRAT

Plaintiff,

vs.

TODD LYONS, and
FREDERICK AKSHAR,

Respondents.

ANSWER

Civil Action
No. 9:26-cv-000448 (EEC)

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 paragraphs 1, and 2, in so far as Respondent is not challenging this Court's jurisdiction and 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 "3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, and 46", 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 Supervisory Border Patrol Agent Adam Matott and is being held by the Broome County Correctional Facility in accordance with that Order. See Exhibit A.

Dated: March 24, 2026
Binghamton, New York

CHERYL SULLIVAN
Broome County Attorney

By: s/ Joshua Terrell
Joshua T. Terrell, Esq.
Assistant County Attorney II
Roll Number 704560
Broome County Attorney's Office
60 Hawley Street
Binghamton, New York 13901
Ph. 607-778-2117
Joshua.terrell@broomecountyny.gov

VERIFICATION

I hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that, on information and belief, the factual statements in the foregoing Answer to Petition for Writ of Habeas Corpus are true and correct.

Dated: March 24, 2026

s/ Joshua Terrell

Joshua T. Terrell, Esq.
Assistant County Attorney II
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Binghamton, New York 13901
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