UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

MAIKON ANDRE DIAS FERREIRA

Plaintiff,

vs.

FREDERICK J. AKSHAR, II, et al.

Respondents.

ANSWER
No. 9:26-cv-00449-BKS

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

FREDERICK J. AKSHAR II
Superintendent

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

Respondent, FREDERICK J. AKSHAR II, as Superintendent of the Broome County Correctional Facility 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 IN PART paragraph II, in so far as Respondent is not challenging this Court's jurisdiction and admits that Petitioner is detained 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 "I, III, IV, V, VI, VII, VIII, IX, and I, II, III, IV, V," 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 in accordance with an Order To Detain signed by Agent Chelsey R. Rickard of the Border Patrol and is being held by the Broome County Correctional Facility in accordance with that Order. See Exhibit A.

Dated: March 26, 2026
Binghamton, New York

CHERYL SULLIVAN
Broome County Attorney

By: s/ Joshua Terrell
Joshua T. Terrell, Esq.
Assistant County Attorney II
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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 26, 2026

s/ Joshua Terrell

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