UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

A.N.P.S., a minor, by and through Next Friend of Kin, N.C.S.E.,	)	
Petitioner,	)	
v.	)	No. 25 C 14778
ANGIE SALAZAR, in her official capacity as Acting Director of the Office of Refugee Resettlement (ORR), *et al.*,	)	Judge Rowland
Respondents.	)	

RETURN TO PETITION FOR HABEAS CORPUS

Pursuant to 28 U.S.C. § 2243, respondents submit this return, together with their accompanying memorandum of law, in response to the petition for a writ of habeas corpus of petitioner A.N.P.S., filed on December 5, 2025. Dkt. 1.

1. The attached documents are taken from A.N.P.S.'s administrative file, as maintained by and provided to this office by U.S. Immigration and Customs Enforcement ("ICE").

2. Exhibit 1 is a copy of the United States Department of Homeland Security's Warrant for Arrest of Alien for A.N.P.S., which was issued on November 7, 2025.

3. Exhibit 2 is a copy of ICE's Notice to the Executive Office of Immigration Review for A.N.P.S.'s immigration case, which was issued on November 7, 2025.

4. The facts contained in Exhibits 1 through 2, as well as the law set forth in respondents' contemporaneously filed memorandum in opposition to A.N.P.S.'s petition, and its accompanying Declaration of establish that his detention is lawful.

WHEREFORE, based on the foregoing, respondents respectfully request that the court enter judgment denying the petition.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

By: s/ Joshua S. Press

JOSHUA S. PRESS
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 886-7625
joshua.press@usdoj.gov