IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

QUAN, Cuong Bao

Petitioner,

v.

JAMISON, J.L.,
Warden, Federal Detention Center, Philadelphia;

RIFE, John E.,
Acting Field Office Director, Immigration and Customs Enforcement, Enforcement and Removal Operations, Philadelphia Field Office;

MULLIN, Markwayne,
Secretary of the Department of Homeland Security;

BONDI, Pamela,
U.S. Attorney General;

EXECUTIVE OFFICE OF IMMIGRATION REVIEW;

U.S. DEPARTMENT OF HOMELAND SECURITY,

Respondents.

Case No. 2:26-cv-2036

PETITIONER'S REPLY IN SUPPORT OF HIS PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

Respondents' failed to properly revoke Petitioner Cuong Bao Quan's Order of Supervision (OSUP), violating both the regulations and due process. First, Respondents' have failed to meet their burden of showing that deportation of Mr. Quan was reasonably foreseeable when they revoked his OSUP and re-detained him at his regularly scheduled immigration check-in. Respondents' argue that changed circumstances support their determination that deportation of him is reasonably foreseeable yet have produced no documents supporting this. They did not have travel documents for him when they detained him six weeks ago, and today they still do not. Simply put, Respondents had no plan when they re-detained Mr. Quan and now intend to subject him to unnecessary detention while they figure out what to do. This is unconstitutional.

Re-detention of Mr. Quan without properly determining that his removal is reasonably foreseeable violates his due process under *Zadvydas v. Davis*, because his re-detention bears no reasonable relationship to the purposes of immigration detention. 533 U.S. 678, 121 (2001). Respondents' further violated the regulation and due process because they have not given Mr. Quan sufficient notice of the revocation of his OSUP, nor have they provided him with a meaningful opportunity to respond. Respondents' have never communicated with Mr. Quan in Vietnamese, the only language that he fully speaks and understands, making any notice insufficient and preventing him from any opportunity to respond. Respondents' also did not give Mr. Quan a prompt revocation custody review—he did not get this interview until twelve days after he was detained, the interview was conducted solely in English, and Mr. Quan was restricted from accessing his counsel, despite his request.

For all of the reasons set forth below and in the Petition, Mr. Quan's petition should be granted and he released from detention.

ARGUMENT

I. There is no significant likelihood of removal of Mr. Quan in the reasonably foreseeable future.

Respondents may only revoke Mr. Quan's release and detain him if there are changed circumstances showing "a significant likelihood that the alien may be removed in the reasonably foreseeable future." 8 C.F.R. § 241.13(i)(2). Prior to his detention—and to date—Respondents have failed to show any changed circumstances that would allow his deportation to Vietnam. They have produced no travel documents, have no plan to deport him, and do little more than cursorily claim that someday, eventually, he may be deported to Vietnam. Mr. Quan has been detained for six weeks, yet nothing has changed. This does not comply with the regulations or due process.

Respondents' bear the burden to show both changed circumstances and a significant likelihood that Mr. Quan may be removed in the reasonably foreseeable future. *See Nguyen v. Hyde*, 788 F. Supp. 3d 144, 150 n.2 (D. Mass. 2025) (finding the government bears the burden under its own regulation); *Lee v. Oddo*, No. CV 25-452J, 2026 WL 523154, at *3 (W.D. Pa. Feb. 25, 2026) (same). Where the removal period has expired and Respondents have not shown that they have a travel document to effectuate removal, there is no significant likelihood of removal. *See e.g.*, *Tran v. Scott*, No. 2:25-cv-01886, 2025 WL 2898638, at *4–5 (W.D. Wash. Oct. 12, 2025) (finding no significant likelihood of removal where travel document request was not submitted until *after* the petitioner was re-detained and had filed a habeas petition and where respondents failed to attach the travel document request to the supporting ICE declaration). Here, more than six weeks have passed since Respondents re-detained Mr. Quan. Respondents have yet to produce a travel document or plan for his imminent removal. Thus, his detention was, and remains, illegal.

Respondents' claim that "ICE revoked Petitioner's OSUP based on documented changed circumstances." ECF 6 at 14. The extent of these changed circumstances are, apparently, a 2020 Memorandum of Understanding between the United States and Vietnam ("2020 MOU"). *Id*. Respondents' have not produced this 2020 MOU here, and, even in cases where it has been produced, courts have explicitly found that "the 2020 MOU alone is not enough to show ICE has met their burden under 8 C.F.R. 241.13(i)(2)." *Nguyen*, 788 F. Supp. 3d at 151 (finding that "2020 MOU does not mandate that Vietnam accept all eligible pre-1995 Vietnamese refugees with orders of removal" and " assuming [Petitioner] is eligible to be removed to Vietnam under the 2020 MOU, which Respondents have not established, DHS may only request his removal; Vietnam has total discretion whether to issue a travel document to any individual"). *Nguyen* is instructive; in that case Respondents' produced the 2020 MOU and a declaration detailing some removals of Vietnamese nationals, yet the court found Respondents' failed to meet their burden of showing removal of that petitioner in particular was reasonably foreseeable. *Id.* (finding issues with the declaration, including lack of the total number of travel document requests and how many of the removals were pre-1995 Vietnamese refugees, like Mr. Quan).

Here, Respondents' have produced nothing showing that Vietnamese nationals are being removed, and nothing to show that Mr. Quan in particular can be removed because he is a pre-1995 refugee. Similarly, like in *Nguyen*, Respondents' have produced almost no information that it is actually requesting a travel document or that it is likely to receive one. *Id*. For example, "Respondents have not identified what concrete steps ICE has taken to process Mr. [Quan]'s particular travel document," and "there is no clear information as to whether or when Mr. [Quan]'s request was submitted to Vietnam, whether Vietnam has even acknowledged receipt of the request or otherwise responded to Mr. [Quan]'s request, or the anticipated wait time for a response from

Vietnam." *Id*. The lack of any information regarding ICE's plans to deport Mr. Quan, including Respondents' own admission they have no travel document, *see* ECF 6, shows that Respondents' have not met their burden to show that removal of Mr. Quan is reasonably foreseeable.

Mr. Quan has been unnecessarily detained for six weeks, separated from his minor children for whom he is the sole caretaker, and nothing has changed. When Respondents revoked his OSUP and today, there was not a significant likelihood that he could be removed in the reasonably foreseeable future. Accordingly, the Court should grant Mr. Quan's petition.

II. The detention and revocation of Mr. Quan's release violates due process under *Zadvydas*.

Respondents' assert that Mr. Quan's detention is presumptively reasonable under *Zadvydas* because he has not yet been detained for six months. ECF 6 at 20-21. Respondents' misapprehend Petitioner's claim and the law by recasting it as a premature *Zadvydas* prolonged detention challenge. When the government re-detains an individual who has been residing in the U.S. for years on an OSUP, the question is not whether that individual has been in custody for six months—a *Zadvydas* claim for initial post-order detention—but rather whether Respondents "acted lawfully when it *revoked* his supervised release and returned him to custody." *Vo v. Lyons*, No. 1:25-CV-533-JL-TSM, 2026 WL 323133, at *3-4 (D.N.H. Jan. 27, 2026) (emphasis in original) (explaining how *Zadvydas* applies to OSUP re-detention claims); *see also De Souza-Ferreira v. Mayorkas*, 25-18142, 2026 WL 788319, at *3 (D.N.J. Mar. 20, 2026) (granting release on the same conditions that existed previously where Respondents failed to meet their burden of rebutting Petitioner's showing that there is no significant likelihood of removal in the reasonably foreseeable future).

Petitioner is not raising a premature *Zadvydas* claim, but instead challenging the reasonableness of his re-detention. Under *Zadvydas*, the "reasonableness" of post-order detention is measured in terms of the statute's basic purpose, "assuring the [noncitizen]'s presence *at the moment* of removal. 533 U.S. at 700 (emphasis added). Mr. Quan's re-detention bears no

connection to the statute's purpose because Respondents have not met their burden to show that removal is reasonably foreseeable. Respondents did not act lawfully when they revoked Mr. Quan's supervised release and re-detained him because Respondents cannot detain Mr. Quan to assure his presence at the moment of removal if they cannot remove him. Respondents had plenty of opportunities to remove Mr. Quan since he was put on an OSUP in 2017, but have never been able to. It would violate due process to allow Respondents to periodically re-detain individuals on OSUPs for months at a time on a whim.

While the government has a stated interest in re-detaining a noncitizen to effectuate his removal, there must be a significant likelihood that the noncitizen may be removed in the reasonably foreseeable future. Where the removal period has expired and Respondents have not shown that they have a travel document to effectuate removal, there is no significant likelihood of removal. *See e.g.*, *Tran*, 2025 WL 2898638 at *4–5. Here, more than six weeks have passed since Respondents re-detained Mr. Quan. Respondents have yet to produce a travel document or plan for his imminent removal. Thus, his detention was, and remains, illegal.

Respondents put forth no facts to suggest that Mr. Quan's continued re-detention is required to assure his presence at the moment that Respondents obtain a travel document. Respondents also do not assert that they are revoking his OSUP because of any violations of the OSUP. Throughout his nine years of compliance with his OSUP, Respondents have never alleged that Mr. Quan failed to appear or apprise ICE of his place of residence. Now, all the sudden, Respondents wish this Court to trust their bare assertion that his removal is foreseeable. They do this despite providing no information about when removal may happen, or if Vietnam will even issue Mr. Quan travel documents. Respondents' have not even done the bare minimum of producing an affidavit from ICE regarding a *request* for travel documents for Mr. Quan. As in

other cases, Mr. Quan's revocation and re-detention violates due process because ICE has failed to "describe any individualized factual development showing that [Petitioner's] removal has become significantly likely in the reasonably foreseeable future." *Vo*, 2026 WL 323133 at *5. Accordingly, the court should grant Mr. Quan's petition and "restore the status quo ante by releasing [Mr. Quan] under his prior order of supervision." *Id*.

III. Respondents did not provide Mr. Quan with notice or a meaningful opportunity to be heard.

Respondents' claim that Mr. Quan was provided with notice and a sufficient revocation custody review as required by regulation and due process is without merit. *See* 8 C.F.R. § 241.13(i)(3). Mr. Quan was not given notice because ICE never communicated with Mr. Quan in a language he understands. Similarly, Respondents' did not provide a revocation custody review that was sufficient under the regulations and due process because ICE did not communicate with Mr. Quan in a language he understands, nor did it inform him that he could present evidence or information. When Mr. Quan told ICE that he had an attorney, ICE stated it did not need to communicate with his attorney and abruptly ended the interview. Respondents' also violated the regulation by failing to provide Mr. Quan with a prompt revocation custody review—it did not occur until twelve days after he was detained.

The regulations require that "[u]pon revocation, the alien will be notified of the reasons for revocation of his or her release." 8 C.F.R. § 241.13(i)(3); *see also Martinez v. JL Jamison*, No. 26-cv-00718, 2026 WL 700335, at *4 (E.D. Pa. Mar. 12, 2026) (requiring notice at the time of arrest and detention). This notice must comply with due process. *See Martinez*, 2026 WL 700335 at *4 ("[A]spects of the Notice of Revocation of Release that was provided to Petitioner give the Court pause as to whether there was proper notice consistent with the Due Process Clause."). Notice must be given in a language the recipient understands. *See Marcinas v. Lewis*, 92 F.3d 195, 204

(3d Cir. 1996) ("[P]rocedural rights would be meaningless in cases where the judge and . . . applicant cannot understand each other."); *see also Augustin v. Sava*, 735 F.2d 32, 37 (2d Cir. 1984) ("A hearing is of no value when the [noncitizen] and the judge are not understood. . . . The very essence of due process is a 'meaningful opportunity to be heard.'" (citation modified)); *Mendoza v. United States*, 755 F.3d 821, 827 (7th Cir. 2014) ("A criminal defendant is denied due process when he is unable to understand the proceedings due to a language difficulty."); *B.C. v. Att'y Gen.*, 12 F.4th 306, 315 (3d Cir. 2021) ("[T]ere is an unacceptably high risk of erroneously depriving a noncitizen of his liberty when an [adjudicator] does not properly assess whether he needs an interpreter.")

Here, Mr. Quan was not given notice because ICE did not tell him that it was revoking his release, nor did it communicate with him in a language he fully understands. When Mr. Quan was detained, ICE simply told him, in English, that he was being deported. Ex. 1 at ¶ 17-19. (Declaration of Mr. Quan). ICE did not tell Mr. Quan that there were changed circumstances, that his removal was reasonably foreseeable, or that it was seeking travel documents. *Id*. This is not notice, which requires "the reasons that they were revoking his OSUP and detaining him—at the time of his arrest and detention." *Martinez*, 2026 WL 700335 at *4.

ICE also only communicated with Mr. Quan in English, a language he does not fully understand, effectively denying him proper notice. Ex. 1. at ¶ 17. To date, ICE has never used a Vietnamese interpreter to inform Mr. Quan that his OSUP was revoked, or why. *Id*. Further, ICE only provided Mr. Quan with documents in English, and Mr. Quan cannot read English. *See* ECF 1-3 (Notice of Revocation), Ex. 1 at ¶ 19. Written notice in only English without explanation in a language Mr. Quan understands is no notice at all. ICE violates due process when it deprives an individual of notice and the opportunity to be heard by relying on a noncitizen's minimal English

language skills when an interpreter is needed. *See B.C. v. Att'y Gen.*, 12 F.4th at 316 (stating it is "ineffective to presume that, because a noncitizen is able to respond to certain basic questions in 'Standard' English . . . he must necessarily be a fluent 'Standard' English speaker who does not need an interpreter" and that "[f]ailing to provide an interpreter when needed makes meaningless a noncitizen's right to due process").

ICE failed to provide Mr. Quan with a proper revocation custody review too. The regulations require ICE to "conduct an initial informal interview *promptly* after his or her return to" custody. 8 C.F.R. § 241.13(i)(3) (emphasis added). Failure to provide "the 'informal interview' that he was entitled to or a meaningful opportunity to be heard" is "a fatal flaw in the due process record." *Martinez*, 2026 WL 700335 at *6. Here, the revocation custody review did not take place prior to or upon revocation. The Notice of Revocation of Release states that Mr. Quan will receive an informal interview on March 23, 2026, four days after his arrest. ECF 1-3. Respondents own documents show they did not interview Mr. Quan until March 31, 2026, twelve days after his detention. This is not prompt. *See Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 165-66 (W.D.N.Y. 2025) (finding that petitioner was not afforded even minimal due process protections when ICE failed to provide petitioner with an informal interview upon his re-detainment); *Wing Nuen Liu v. Carter*, No. 25-cv-03036, 2025 WL 1696526, at *2 (D.Kan. June 17, 2025) (finding "that officials did not properly revoke petitioner's release" because "most obviously . . . petitioner was not granted the required interview upon the revocation of his release."); *Dudamel v. Jamison*, No. cv-26-361, 2026 WL 498612, at *5 (E.D. Pa. Feb. 23, 2026) (stating that providing petitioner with the informal interview sixteen days after re-detention violates the regulation).

Mr. Quan was also "not given a meaningful opportunity to contest the reasons for revocation and submit evidence on his behalf" at this revocation custody review. *Martinez*, 2026

WL 700335 at *6; *see* 8 C.F.R. § 241.13(i)(3) (the interview will "afford the alien an opportunity to respond to the reasons for revocation stated in the notification. The alien may submit any evidence or information that he or she believes shows there is no significant likelihood he or she be removed in the reasonably foreseeable future."). ICE again failed to provide Mr. Quan an interpreter at this interview, and instead only spoke with him in English—a language he does not fully understand, thereby depriving him of a meaningful opportunity to contest the reasons for revocation and submit evidence on his behalf. Ex. 1 at ¶ 23.; *see also* ICE Form 71-090 (no indication interpreter provided). At this interview, the immigration official did not inform Mr. Quan that he had the opportunity to present evidence or information, and when Mr. Quan stated he had an attorney the official told him ICE did not need to talk to his attorney and then abruptly ended the interview. Ex. 1 at ¶ 23.

There is no indication that, even if ICE had provided Mr. Quan with a sufficient interview, it would have made a difference. *See Martinez*, 2026 WL 700335 at *6 ("[T[he Court is not naïve enough to think that this interview would have changed anything at the time, given the lock step, one-size-fits-all approach then in play."). The regulations state the "revocation custody review will include an evaluation of any contested facts relevant to the revocation and a determination whether the facts as determined warrant revocation and further denial of release." 8 C.F.R. § 241.13(i)(3). This review happened over a month ago, yet there is no evidence of any evaluation or determination based on the interview. The only document Respondents' have provided is a mostly blank form with three handwritten bullet points describing Mr. Quan's statements at the interview. *See* ICE Form 71-090.

It is clear that ICE has consistently failed to provide Mr. Quan with the bare minimum requirements in revoking his OSUP. Mr. Quan has been denied a meaningful opportunity to

respond because ICE has never communicated with him in a language he understands, did not inform him of the reasons for revocation at the time of his detention, did not inform him that he could present evidence and information in his defense, and refused to communicate with his lawyer. This "lock step, one-size-fits-all approach" violates the regulations and due process, so he should be ordered released. *Martinez*, 2026 WL 700335 at *6.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this Honorable Court grant his petition for a writ of habeas corpus and order his immediate release.[1]

Respectfully submitted,

DATED: May 1, 2026

/s/ Michael Geoffino
Michael Geoffino (PA ID 333816)
Mikaela Wolf-Sorokin (PA ID 335725)
Andrea P. Solis Canto (PA ID 337904)
Lilah Thompson (PA ID 324718)
DEFENDER ASSOCIATION OF PHILADELPHIA
1441 Sansom St.
Philadelphia, PA 19102
(215) 568-3190
mngeoffino@philadefender.org
Pro Bono Counsel for Petitioner

Attorneys for Petitioner

[1] In similar cases where the government violated OSUP procedures and detained a noncitizen in violation of the INA, its regulations, and due process rights, district courts have found that the appropriate remedy is release. *See e.g.*, *Singh v. Oddo*, No. CV 25-269J, 2025 WL 3636284, at *4 (W.D. Pa. Dec. 16, 2025); *Pan v. Oddo*, No. 3:25-CV-265, 2025 WL 3701296, at*2 (W.D. Pa. Dec. 21, 2025); *Talebinejad v. Otto*, No. 3:25-CV-329, 2026 WL 693922, at*2 (W.D. Pa. Mar. 12, 2026); *Lam v. Noem*, No. 3:25-CV-00397, 2026 WL 492383, at*7 (W.D. Pa. Feb. 23, 2026).

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed **REPLY IN SUPPORT OF HIS PETITION FOR WRIT OF HABEAS CORPUS**, and all attachments using the CM/ECF system. All parties are participating in the CM/ECF system.

DATED: May 1, 2026

/s/ Michael Geoffino

Michael Geoffino
DEFENDER ASSOCIATION OF PHILADELPHIA
1441 Sansom St.
Philadelphia, PA 19102
T: (215) 568-3190
E: mngeoffino@philadefender.org
Pro Bono Counsel for Petitioner

DECLARATION OF CUONG BAO QUAN

I, Cuong Bao Quan swear under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. My name is Cuong Bao Quan. I was born on [redacted] in Vietnam.
2. I entered the United States as a refugee in 1994.
3. I became a lawful permanent resident of the United Stated in 2012.
4. I have 3 U.S. citizen children. I have been their only parent. Their mother left us when they were young and they never really got to know her. I lived with and cared for my children, and my parents, who are elderly now. We all lived in Ambler, Pennsylvania together in a home. My eldest daughter is a freshman in college at Penn State. My other two children are in high school.
5. On June 15, 2016 I plead guilty to Possession with Intent to Deliver a Controlled or Counterfeit Controlled Substance.
6. I was not guilty of this offense. I did not do it. But I pled guilty because my attorney told me it was the fastest way to get rid of the criminal case. I needed to get out of jail and take care of my young children because I am their only parent. I did not know that this would create any problems for me with immigration. No one ever told me that.
7. After I pled guilty, the prosecutor sent me a letter saying they discovered some problems with my conviction. [redacted]
8. An attorney from the Public Defender's Office in Montgomery County said that they could help me. The office filed a motion for me in August of 2017 to get rid of my conviction because of the police misconduct. The prosecutor agreed to let me take back my guilty plea because of this evidence and withdraw all the charges against me.
9. On September 6, 2017, the criminal court ordered my guilty plea withdrawn and dismissed these charges. I was told this means that I am not convicted of this anymore. I am glad that the court recognized that I was not guilty.
10. After I was convicted of this offense, but before the conviction was fixed, I was detained by immigration officials and held at York County Prison. I had to go to immigration court from detention. The immigration judge took away my green card because of my conviction and told me not to fight the case because people like me can't be deported to Vietnam. The immigration judge ordered me deported on December 7, 2016, but I was told it did not matter since they could not actually deport me. I did not have a lawyer for my immigration case. I was ordered deported to Vietnam, but after about six months of detention I was released home. ICE said they had to let me go because ICE could not deport me.
11. After my conviction was fixed I hired an immigration lawyer to get my green card back. He told me that he was filing a document with the immigration judge who heard my case. I followed up with him many times, but he never was able to get me my green card back. Even though the attorney said he presented evidence that I was not guilty, the immigration judge did not actually look at it. He didn't look at the fact that the reason I was ordered

deported was because of a crime that I wasn't guilty of and did not commit. This is wrong because I was not convicted of this crime and I should get my green card back.

12. When I was released from detention in 2017 by ICE I was given an Order of Supervision, which meant I had to report to ICE every six months or a year and bring my Order of Supervision with me. There was a log attached to it that ICE filled out each time I went. I always made sure to go and comply with my order.
13. ICE also told me I had to ask the Vietnamese Embassy if the government of Vietnam would give me travel documents. I went to the embassy in Washington DC and on July 25, 2017 the embassy sent me a letter saying it would not give me travel documents to be deported.
14. I reported to ICE for nine years and always did what I was supposed to. I had to go to ICE every six months. When I went to ICE I brought them my Vietnamese birth certificate and passport. ICE never used a Vietnamese interpreter to talk to me but every time ICE told me to come back in six months.
15. On March 19, 2026 I went to ICE for a normal check in. Instead of telling me to come back in six months, ICE told me to go into a hallway. After I went in the hallway they put me in a room. In the room they slammed me down into a chair and pinned me to the chair. They acted as if I was going to run away but I would not run away. I always did what ICE told me to. ICE did not ask me to sit down, but instead pushed me down into the chair. ICE did not ask me to empty my pockets, instead the officers reached into my pockets and took everything. ICE handcuffed me after this.
16. I was very scared when ICE slammed me into the chair. I was very confused and did not know what was going on, ICE did not tell me anything before they slammed me into the chair. I told them I did not know what was going on. ICE then told me that I was being detained because ICE had an order to deport me to Vietnam. This confused me, ICE had the deportation order for nine years why did they do this now
17. ICE did not use a Vietnamese interpreter when speaking to me, they only spoke in English. I can understand very basic English but not too much. I could not fully understand what ICE said to me.
18. ICE only told me that I was going to be deported to Vietnam. ICE did not tell me that my Order of Supervision was revoked, or that my prior release was revoked. ICE did not tell me that ICE had travel documents to send me to Vietnam. ICE did not tell me that anything changed since my last check in.
19. ICE put three documents in front of me but I cannot read English, so I don't know what these documents said or meant and they did not give me an interpreter to explain them. ICE did not give me any documents in Vietnamese that I could read or understand. ICE did not explain to me what these documents said in English or in Vietnamese.
20. After this, ICE brought me to a jail in Philadelphia. About a week after I got to the jail, I met an attorney who said that she could help me for free. She gave me her number and said that if ICE tried to talk to me about anything that I should call her.
21. Immigration officials visited me twice when I was at the Philadelphia jail. I don't know exactly when the officials visited me because its hard to keep track of time in jail.
22. The first time an immigration official visited me was soon after I was brought to the jail. This immigration officer only spoke to me in English and did not provide a Vietnamese

interpreter. This interview was very short. The immigration official did not tell me their name or their job title. The immigration official only told me that I was being deported to Vietnam, but did not tell me when I would be deported. The immigration official told me I had an order of deportation to Vietnam. The immigration official did not tell me my Order of Supervision was revoked, or my prior release was revoked. The immigration official did not tell me anything had changed since my last ICE check-in, or that ICE now has travel documents to send me to Vietnam. The immigration official did not ask me if I had any documents, evidence, or information why I should not be deported to Vietnam. The immigration official did not show me any documents. The immigration official did not ask me if I have an attorney. I had no opportunity to say defend myself when talking to this immigration official.

23. The second time an immigration official visited me was a few weeks after the first visit. I do not know the date of this. The immigration official only spoke English and did not provide a Vietnamese interpreter. I had trouble fully understanding what the official said to me. This immigration official did not tell me their name or job title. This interview was also very short. The immigration official told me that I was going to be deported to Vietnam. I told the immigration official that I went to all of my ICE check ins and did everything I was supposed to do. I also tried to tell ICE that I was found not guilty at my last criminal hearing. I can't speak a lot of English so this was all I could say to defend myself. The immigration official did not tell me my Order of Supervision was revoked, or my prior release was revoked. The immigration official did not tell me anything had changed since my last ICE check-in, or that ICE now has travel documents to send me to Vietnam. The immigration official did not ask me if I had any documents, evidence, or information about why I should not be deported to Vietnam. Without an interpreter, I could not tell the immigration official any of this anyways. The immigration official showed me a document, but it was in English so I could not read it. I told the immigration official to talk to my lawyer. The immigration official said they did not need to talk to my attorney and would not call her. They then sent me out of the room back to my cell.
24. I have not talked to any immigration officials about my case since this.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. I swear and affirm that this statement was reviewed with me by phone using a Vietnamese interpreter through Language Line.

/s/ Cuong Bao Quan — 4/29/2026
Cuong Bao Quan — Date