IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO
MAR 30 2026
JEFFREY P. COLWELL
CLERK

Civil Action No. _____
(To be supplied by the court)

THIEN VAN VO, Applicant,

v.

TODD LYONS, ICE ACTING DIRECTOR
MADISON SHEAHAN, ICE DEPUTY DIRECTOR
JUAN BALTAZAR, WARDEN OF AURORA DETENTION CENTER, Respondent.
(Name of warden, superintendent, jailer, or other custodian)

(Note: If you are attacking the validity of a state conviction or sentence and not the execution of your sentence, you must file an application for a writ of habeas corpus pursuant to 28 U.S.C. § 2254. If you are attacking the validity of a judgment entered in a federal court, you must file a motion pursuant to 28 U.S.C. § 2255 in the federal court that entered the judgment.)

APPLICATION FOR A WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

A. APPLICANT INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

THIEN VAN VO, [redacted], 3130 N. OAKLAND ST., A3-108., AURORA
(Applicant's name, prisoner identification number, and complete mailing address)
CO 80010 (AURORA ICE DETENTION CENTER

Indicate whether you are a prisoner or other confined person as follows: (check one)

___ Pretrial detainee
___ Civilly committed detainee
X Immigration detainee ✓
___ Convicted and sentenced state prisoner
___ Convicted and sentenced federal prisoner
___ Other: (*Please explain*) _____

B. RESPONDENT INFORMATION

TODD LYONS / MADISON SHEAHAN : U.S. ICE, 12445 E. CALEY AVE., CENTENNIAL CO 80111.
(Respondent's name and complete mailing address)

JUAN BALTAZAR : 3130 N. OAKLAND ST., AURORA CO 80010

C. STATEMENT OF CLAIMS

State clearly and concisely every claim you are asserting in this action. For each claim, specify the right that allegedly has been violated and all facts that support your claim. If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "C. STATEMENT OF CLAIMS."

CLAIM ONE: I HAVE BEING DETAINED AND UNDER CUSTODY TWICE FOR A PROLONGED TIME.

Supporting facts:

ADDITIONAL PAPERS ARE ATTACHED.

D. PRIOR APPLICATIONS

Have you ever filed a lawsuit, other than this lawsuit, in any federal court in which you raised or could have raised the claim(s) raised in this action? ___ Yes X No (*check one*).

If your answer is "Yes," complete this section of the form. If you have filed more than one prior application, use additional paper to provide the requested information for each prior application. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "D. PRIOR APPLICATIONS."

Name and location of court: _____

Case number: _____

Type of proceeding: _____

List the claim(s) raised: _____

Date and result: (Attach a copy of the decision if available) _____

Result on appeal, if appealed: _____

E. ADMINISTRATIVE REMEDIES

WARNING: You must exhaust administrative and/or state remedies before filing an action in federal court pursuant to 28 U.S.C. § 2241. Your case may be dismissed if you have not exhausted administrative and/or state remedies. If additional space is needed to explain exhaustion, use extra paper to do so. Please indicate that additional paper is attached and label the additional pages regarding exhaustion as "E. ADMINISTRATIVE REMEDIES."

Explain the steps you have taken to exhaust administrative and/or state remedies:

. ON 03/08/26 I RECEIVED A LETTER "NOTICE TO ALIEN OF FILE CUSTODY REVIEW" FROM ICE WHERE THEY SAY THAT MY CUSTODY STATUS WILL BE REVIEWED ON OR ABOUT 03/08/2026. TO THE DATE I DID NOT GET ANY OTHER LETTER ABOUT IT.

. MY FIRS LEGAL ACTION IS THIS APPLICATION FOR A WRIT OF HABEAS CORPUS.

F. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "F. REQUEST FOR RELIEF."

ADDITIONAL PAPER IS ATTACHED.

G. APPLICANT'S SIGNATURE

I declare under penalty of perjury that I am the applicant in this action, that I have read this application, and that the information in this application is true and correct. *See* 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this application: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the application otherwise complies with the requirements of Rule 11.

(Applicant's signature)

03/25/26
(Date)

(Form Revised December 2017)

C. STATEMENT OF CLAIM

Supporting Facts:

1. I was born in Vietnam in 1975. I entered to the USA on or about January 1991 when I was 15 years old with my whole family (parents and siblings) under refugee status. I got the Permanent Residence (Green Card) on December 1991.

2. I was arrested by first time on April 1994 which I paid in a county jail and completed with my probation. I was arrested by second time in 2006, sentenced in 2008 and served in prison for 4 ½ years, being released in 2012 and completed the probation period for 5 years.

3. On or about Jun or July 1996 I was detained first time by ICE through Jun or July 1998, being released after 2 years detained and under custody in Aurora Detention Center; after that I was under supervision of ICE and being checked in every year under direction of ICE.

4. On or about August 1996 an Immigration Judge ordered me being removed from the United States. In 2003 I tried to reopen my immigration case and got a Final order on August 30, 2004 as shown in the attached Form I-229(a) Warning for Failure to Depart.

5. After being released from the prison in 2012, I had to check in with ICE, every 3 months for approximately 10 year, then I stopped doing that.

6. On 02/07/26 I was detained and put under custody in Aurora ICE Detention Center to the date.

7. Since an Immigration Judge ordered my removal from the USA to date (almost 30 years) I was under custody of ICE. ICE arrested me twice which I was detained over 2 years. Over 25 years I was under supervision of ICE doing my checks in under ICE directions; during that extensive period of time ICE did not made any effort to remove me to my country.

8. On 03/08/26 ICE sent me a letter "NOTICE TO ALIEN OF FILE CUSTODY REVIEW" and "Warning for Failure to Depart" (see attachment C-1), where they said that my custody status will be reviewed on or about 03/08/26. To the date I have not received any letter from ICE regarding to determination of my custody as ICE has expressed.

9. I never had a passport or any ID from Vietnam; ICE provided me with Forms to obtain a travel document which I filled it out and sent them back to ICE to finish the process. ICE got mi bio-metrics and fingerprints.

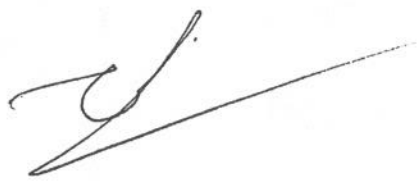
10. Since 2012 to date (over 13 years) I never was involved in any kind of troubles, even any traffic violations; I recognize that I made big mistakes in the past which consequences and responsibilities I accepted paying the imposed sentence. After all this long time since the last big mistake I made and took full responsibility for those actions which I used those bad experiences as a turning point; I consider by myself as a man of good moral character and not a danger to the community with no any risk to flight.

11. I am a family man; I am a single dad who raised my daughter since she was born due to lack of interest of her mother for continuing into the family group after delivering of the newborn. I have been paying my taxes every single year. I an a man of faith attending the church every weekend; I have a residence in [redacted] Colorado; and a job is waiting for me. My daughter, relatives and friends can express on their own words according to the support letters (see attachments C-2).

12. **My continued detention is unlawful, and I am unlikely to be removed in the reasonably foreseeable future. Therefore, My detention violates the statute and I am entitled to immediate release.** As the Supreme Court held in *Zadvydas v. Davis*, 533 U.S. 678 (2001), noncitizens cannot be detained indefinitely if the government is unable to carry out their removal. Instead, detention after a final order of removal is authorized only when removal is

reasonably foreseeable. As a guide to courts, the Court in *Zadvydas* established a presumption that detention after a final order of removal was permissible for six months. Detention after a final order may be unlawful even when six months have not passed, particularly if it is clear that the United States will not be able to effect a noncitizens's removal. But after that six months period, once a noncitizen provides "good reason to believe that there is not significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing." And the longer a noncitizen has been detained, the stronger the government's showing must be. Petitioner is entitled to release under the framework of *Zadvydas* unless the government promptly demonstrate that there is a significant likelihood of removal in the reasonably foreseeable future.

13. My prolonged detention also violates the Due Process Clause. The Due Process Clause of the Fifth Amendment forbids the government from depriving any "person" of liberty "without due process of law." U.S. Const. Amend. V. "Freedom from imprisonment—from government custody, detention or other form of physical restraint—lies at the heart of the liberty" that the Due Process Clause protects. *Zadvydas*, 533 U.S. at 690 (citing *Founcha v. Louisiana*, 504 U.S. 71, 80 (1992). Civil immigration detention violates due process if it is not reasonably related to its statutory purpose. *See, id.* (*citing Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). In the immigration context, the Supreme Court has recognized only two valid purposes for civil detention: to mitigate the risk of flight and prevent danger to the community. *Id.* Petitioner's prolonged civil detention, which has lasted well beyond the end of the removal period, and which is likely to continue indefinitely, is no longer reasonably related to the primary statutory purpose of ensuring imminent removal. Thus, Petitioner's detention violates Petitioner's right to due process.



14. This action arises under the Constitution of the United States and the Immigration and Nationality Act ("INA") §§ 101-507, 8 U.S.C. § 1101-1537, amended by the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, Pub. L. No. 104-208, 110 Stat. 3009-1570.

15. This Court has jurisdiction under 28 U.S.C. § 2241, The Suspension Clause, U.S. Const. Art. 1 § 9, cl 2, and 28 U.S.C. § 1331, as Petitioner is presently in custody under color of the authority of the United States, and Petitioner's custody is in violation of the Constitution, laws, or treaties of the United States. *See Zadvydas*, 566 U.S. 678. This Court may grant relief under 28 U.S.C. § 2241 (Habeas Corpus), 5 U.S.C. § 702 (establishing the right of review for a person suffering a legal wrong due to agency action), and 28 U.S.C. § 1651 (All Writs Act).

16. The Due Process Clause applies to all persons in the United States, "whether their presence here is lawful, unlawful, temporary or permanent." *Zadvydas*, 533 U.S. at 693. In *Zadvydas*, the Supreme Court emphasized, "[f]reedom from imprisonment—from government custody, detention, or other forms of physical lies at the heart of the liberty that [the Due Process] Clause protects." 533 U.S. at 690 (citing Foucha v. Louisiana, 504 U.S. 71, 80 (1992). The Court noted, "[a] statute permitting indefinite detention of an alien would raise a serious constitutional problem," *Id.; see also Plyer v. Doe, 457 U.S. 202, 210 (1982)* ("Aliens, even aliens whose presence in this country is unlawful, have long been recognized as "persons" guaranteed due process of law by the Fifth and Fourteenth Amendments").

17. Under 8 U.S.C. § 1231(a)(2), noncitizens subject to final orders of removal "shall" be detained during the first 90 days—the "removal period"--and they "shall" be removed during that period under § 1231(a)(1). Under 8 U.S.C. § 1231(a)(6), the government "may" continue detention beyond the 90-days removal period if a noncitizen falls within certain broad categories of removability or is determined "to be a risk to the community or unlikely to comply with the order of removal." 8 U.S.C. § 1231(a)(6).

18. In *Zadvydas*, the Supreme Court construed 8 U.S.C. § 1231(a)(6) to authorize detention only where it is significantly likely that removal will occur in the reasonably foreseeable future, in order to avoid the serious due process concerns that would be presented by permitting detention for an indefinite period of time. *Zadvydas*, 533 U.S. at CITE. After a noncitizen meets his o her initial burden to show that no such likelihood of removal exists, the burden shifts to the government to "respond with evidence sufficient to rebut [the alien] showing, "*Id. A*t 701.

19. Courts have rejected conclusory claims by ICE agents which claim, without submitting concrete factual information about scheduled flights or repatriation agreements, that removal is imminent. "[A] theoretical possibility of eventually being removed does not satisfy the government's burden once the removal period has expired and the petitioner establishes good reason to believe his removal is not significantly likely in the reasonably foreseeable future." *Balza v. Barr, No. 6:20-CV-00866, 2020 WL 6143643, at *5 (W.D. La. Sept. 17, 2020) (*internal quotation and citation omitted). "[I]f [ICE] has no idea of when it might reasonably expect [Petitioner] to be repatriated, [a] Court certainly cannot conclude that [a] removal is likely to occur—or even that it might occur—in the reasonably foreseeable future." *Id. at* *5 (internal quotation marks and citation omitted). *See also, Gomez Barco v. Witte, No.* 6:20-CV-00497, 2020 WL 7393786 (W.D. La. Dec. 16, 2020) (ordering release of a petitioner who was detained longer than six months because ICE had not be able to secure necessary travel document, nothing that the ICE officer "clearly has no factual basis for his 'belief' that there is not foreseeable impediment of Petitioner's removal or that her removal is imminent," and that there was not foundation for the "expectation" that the COVID-19 related travel restrictions in place would soon be lifted); *Balza v. Barr,* No. 6:20-CV-00866,2020 WL 6064881 (W.D. La. Oct. 14, 2020) (same).[1] In granting

1 Other districts courts in the Fifth Circuit and Elsewhere have similarly granted Habeas relief when the noncitizen has shown that there is no significant likelihood of removal in the reasonably foreseeable future. *See, e.g., Carreno v. Gillis,* No. 5:20-cv-44-KS-MTP, 2020 WL 8366735 (S.D. Miss. Dec. 16, 2020) (granting Habeas relief to petitioner detained for approximately sixteen months due to a lack of diplomatic relations with Venezuela); *Ali v. Dep't of Homeland Sec., 451 F, Supp. 3D 703 (S.D. Tex. 2020)* (granting Habeas relief to petitioner initially detained for three years, released and detained again for four months when petitioner could not be removed due to travel restrictions to Pakistan); *Saharifi v.*

Ms. Balza's release, the Court considered and rejected a conclusory declaration by a local ICE Assistant Field Officer that removal was imminent. *Id.* at *5. In *Alexis v. Smith*, the Petitioner, Mr. Alexis, had been in detention for almost a year and subject to a removal order for over a year. An ICE official testified to an informal agreement that permitted removals but acknowledged that there were far fewer removals to Haiti in the aftermath of the 2010 hurricane. The Haitian government had an issue with identity documents and it was unknown when that would be resolved. The magistrate did not credit ICE's vague statements that it was "endeavoring to rectify the issue" and conclude there was no end in sight for detention, and recommended release. The District Court Judge agreed and ordered release. ICE then released Mr. Alexis on an Order of Supervised release and moved to get the judgment vacated on mootness, which it was. However, this does not invalidate the reasoning and conclusions of the Magistrate Judge and District Court Judge on this subject, and this case is still informative and persuasive to the body of law on this subject. *Alexis v. Smith*, No. CIV.A. 11-0309, 2011 WL 3924247 (W.D. La. Aug. 3, 2011) report and recommendations adopted. No. CIV.A 11-0309, 2011 WL 3954945 (W.D. La. Sept. 6, 2011), vacated. No. CV 11-0309, 2011 WL 13386020 (W.D. La. Sept. 15, 2011).

20. Courts in this Districts have—pursuant to *Zadvydas*—released individuals who have been detained for over six months. *See. e.g. Gomez Barco*, 2020 WL 7393786 (ordering released of an immigrant detained who was a native and citizen of Venezuela who was detained longer than six month because ICE had not been able to secure necessary travel documents); *Balza*, 2020 WL 6143643, at *5 (ordering release of petitioner and nothing that "[a]fter more than a year of detention, Petitioner's removal need not necessarily be imminent, but it cannot be speculative") (internal quotation marks omitted).

Gillis, No. 5:20-cv-5-DCB-MTP, 2020 WL 7379211 (S.D. Miss. Oct. 9, 2020) (granting Habeas relief to petitioner detained for seventeen months after Iranian officials failed to respond a travel document request for more than seven months).

21. Under *Zadvydas*, courts have found that there is no significant likelihood of removal and granted relief where:

- No country will accept the petitioner. *See, e.g. Jabir v. Ashcroft*, No. 03-2480, 2004 WL 60318 (E.D. La. Jan. 8, 2004) (granting habeas relief to petitioner detained for more than fourteen months after numerous countries refused to repatriate the petitioner).[2]
- The Petitioner's country of origin refuses to issue a travel document, *See. e.g., Alexis v. Smith*, No. 11-0309, 2011 WL 3924247 (W.D. La. Aug. 3, 2011) (granting habeas release to petitioner detained for approximately one year due to the Haitian government rejecting the quality of identity documents provided); *Fermine v. Dir. Of Immigr. Custom Enf't*, No. 2:06-cv-1578, 2007 WL 2284606 (W.D. La. May 23, 2007) (granting habeas relief to petitioner detained for fifteen months due to Trinidad's refusal to issue travel documents); *Lijadu v. Gonzales*, No. 06-1208, 2006 WL 3933850 (W.D. La. Dec. 18, 2006) (granting habeas relief to petitioner detained nineteen months because Nigeria refused to issue travel documents due to petitioner's HIV status).[3]
- There is not removal agreement between the United States and a country. In this scenarios, courts have found that the lack of a normal agreement regarding repatriation, lack of diplomatic relationship, and lack of a functioning government support a finding that there is no significant likelihood of removal. *See, e.g. Negusse v. Gonzales*, No. 06-1382, 2007 WL 708615 (W.D. La. Mar. 1, 2007) (granting habeas relief to petitioner detained for approximately one year because the United States did not have a repatriation agreement with

2 *See also Hassoun v. Sessions*, No. 18-CV-586-FPG, 2019 WL 78984, at *4 (W.D.N.Y. Jan. 2, 2019) (ordering release of petitioner detained fourteen months after petitioner showed "that the countries with he has any affiliation will not accept him"), *Yusupov v. Love*, No. 4:CV-06-1804, 2007 WL 5063231 (M.D. Pa. Jan. 12, 2007); *Abel-Muhti v. Ashcroft*, 314 F. Supp. 2d 418 (M.D. Pa. 2004) (ordering release of petitioner detained approximately two years after refusal of several countries to accept petitioner).

3 *See also Ka v. Bureau of Immigr. & Custom Enf't*, No. B-07-197, 2008 WL 11462867, at *8 (S.D. Tex. June 24, 2008) (ordering release of petitioner detained twelve months after Senegal "refuses to issue Ka a travel document because he d[id] not have proper identity documentation"); *Moreira v. Gonzales*, No. CIVA CV05-588 A, 2006 WL 3861972 (W.D. La. Nov. 2, 2006) (granting habeas relief to petitioner detained for three years because Cape Verde advised that it would not accept the petitioner for repatriation); *Khan v. Gonzales*, 481 F. Supp. 2d 638 (W.D. Tex. 2006).

Ethiopia and Ethiopia would not issue travel documents because one of the petitioner's parents was not Ethiopian).[4]

- There is either no response from a country designated for removal or a significant delay in receiving a response. *See. e. g., Gonzales-Rondon v. Gillis*, 5:19-cv-109-DCB-MTP, 2020 WL 3428983 (S.D. *Miss. June 23, 2020) (granting habeas relief to petitioner detained thirteen months where there was no response from Venezuelan officials.*[5]

- ICE fails to take action to secure travel documents for a prolonged period. *See, e.g. Senor*, 401 F. Supp. 3d at 430-31 (granting habeas relief after ICE initially requested travel documents but where "there [wa]s no identification from the record that anyone ha[d] taken any further action in the eight months since that time. . .to facilitate Senor's receipt of the necessary travel documents").[6]

22 As the length of detention grows, the period of time that would be considered the "reasonably foreseeable future" shrinks. *See e.g., Zadvydas*, 533 U.S. at 701 (stating that as the length of time in detention grows "what counts as the 'reasonably foreseeable future' conversely would be to shrink"); *Senor*, 401 F. Supp. 3d at 430 ("'[T]he passage of time combined with 'the' government

4 *See also Gomez Barco*, 2020 WL 7393786, *Islam v. Kane*, No. CV-11-515-PHX-PGR (LOA), 2011 WL 4374226, at *3 (D. Ariz. Aug. 30, 2011) (ordering release of petitioner detained ten months where petitioner presented evidence that Bangladesh "is one of fifteen countries identified by ICE as least likely to issue travel documents"); *Carreno*, 2020 WL 8366735, *Simoza Rangel v. Gillis*, No. 5:19-cv-118-DCB-MTP, 2020 WL 7223258 (S.D. Miss. Sept. 2, 2020) (granting habeas relief to petitioner detained for sixteen months due to lack of diplomatic relation with Venezuela); *Abduelle v. Gonzales*, 422 F. Supp. 2d 774 (W.D. Tex. 2006) (concluding that the petitioner met the burden to show removal was not reasonably foreseeable after being detained for more than one year when an injunction restricted the government's ability to remove the petitioner to Somalia).

5 *See also Sharif*, 2020 WL 7379211; *Aung v. Barr*, No. 20-CV-681-LJV, 2020 WL4581465 (W.D.N.Y. Aug. 10, 2020); *Edwards v. Barr*, No. 4:20cv350-WS-MAF, 2020 WL 6747737 (N.D. Fla. Oct. 14, 2020); *Rual v. Barr*, No. 6:20-CV-06215 EAW, 2020 WL 3972319 (W.D.N.Y. July 14, 2020); *Rodriguez Del Rio v. Price*, No. EP-20-CV-00217-FM, 2020 WL 7680560 (W.D. Tex. Nov. 3, 2020); *Singh v. Whitaker*, 362 F. Supp. 3d 93 (W.D.N.Y. 2019); *Butt v. Holder*, No. CA 08-0672-CG-C, 2009 WL 1035354 (S.D. Ala. Mar. 19, 2009) (holding that petitioner met his initial burden where he was held in ICE custody for more than ten months after the issuance of his removal order with no indication from the Pakistan Embassy that travel documents would be issued); *Lawrikov v. Kollus*, No. CV-08-1403-PHX-GMS (LOA), 2009 WL 2905549 (D. Ariz. July 27, 2009); *Reid v. Crawfort*, No. 06-02436 PHX-JWS (MEA), 2007 WL 1063413 (D. Ariz. Jan. 31, 2007); *Gui v. Ridge*, No. 3CV031965, 2004 WL 1920719 (M.D. Pa. Aug. 13, 2004); *Shefqet v. Ashcroft*, No. 02C 7737, 2003 WL 1964290 (N.D. III. Apr. 28, 2003).

6 *See also Chun Yat Ma v. Asher*, No. C11-1797 MJP, 2012 WL 1432229, at *4 (W.D. Wash. Apr. 25, 2012) (ordering petitioner's release where the government failed "to provide any documentation of efforts . . . to effectuate removal . . . [for] nearly six months").

[being] no closer to . . . repatriating [a detainee] than they were once they first took him into custody' [is] sufficient to meet that 'initial burden."'); *Lawrikow*, 2009 WL 2905549, at *12.

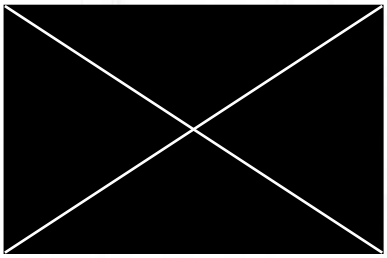
F. REQUEST FOR RELIEF

1. Petitioner respectfully requests that this Court order Respondents to show cause why should not be granted, and set a hearing on this Petition, and **grant the Writ of Habeas Corpus ordering Respondents to immediately release Petitioner from their custody.**

2. In order to permit full judicial review of the claim herein and requested relief, Petitioner respectfully requests that the **Court orders Respondents a Temporary Restraint and not to transfer Petitioner outside the jurisdiction of this Court pending considerations of this petition.**

C-2

Jaimee Vo



To Whom It May Concern,

My name is Jaimee Vo, and I am writing this letter in support of my father, Thien Van Vo, regarding his immigration case. I respectfully ask that you consider my words when reviewing his situation. My father has been living in the United States since 1991, and for most of my life I have witnessed both the challenges he has faced and the growth he has achieved as a person. Growing up, I missed out on a lot of time with my father while he served his sentence. However, from what I remember during the time he was with us, he was always kind, caring, and brought joy to our family. His positive attitude and warm smile helped keep our family strong even during difficult times. He has always shown a willingness to do anything for the people he loves, and that dedication to his family speaks for itself.

My father comes from a large immigrant family. From my grandmother, he learned what it means to work hard and sacrifice for your family. She came to America with very little and built a life from the ground up through determination and hard work. Those values were passed down to my father. Although his roots are in Vietnam, the United States is the place where he built his life, raised his child, and created countless memories through years of effort, struggle, and perseverance.

Like many young people, my father made mistakes when he was younger. Those mistakes had serious consequences, and he accepted responsibility and served his sentence. Over the many years since that time, my father has demonstrated through his actions that he is committed to living a lawful, responsible, and productive life. After that period in his life, he worked hard to rebuild himself and move forward in a positive direction. Today he works in landscaping and has built his own business through honest labor and dedication. Through his work he has built relationships with people in the community who know him as a dependable and hardworking person.

My father knows no other home besides the United States. This is where his family lives, where I grew up, and where he has built friendships and connections in the community. Being removed from the country after more than three decades would mean starting his life over from nothing. Everything he knows, including his work, his family, and the life he has worked so hard to build, is here.

I believe the justice system can serve its purpose when people are given the opportunity to learn, grow, and move forward. When my father was younger he made decisions that affected his life in ways we all wish could have been different. At that time our family did not have the knowledge or resources to help guide him through the system. Despite those challenges, he found a way to stand back up, rebuild his life, and continue forward as a better man.

His story is one of falling, learning, and getting back up again. Through hard work, perseverance, and commitment to his family, he has proven that people can grow beyond

their past. In many ways his journey reflects the values of resilience and determination that people pursue when they come to America to build a better life.

As his only child, my father's presence in my life provides emotional support, stability, and guidance. Losing him would create a hardship that would affect my life in a profound way. I respectfully ask that his decades of life in this country, his rehabilitation, his dedication to his work, and his commitment to his family be taken into consideration.

Thank you for taking the time to read my letter and consider my father's case.

Sincerely,

Jaimee Vo

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

State of Colorado
County OF ARAPAHOE.
This record WAS acknowledged before me on MARCH 8th 2026
by. JAimee vo

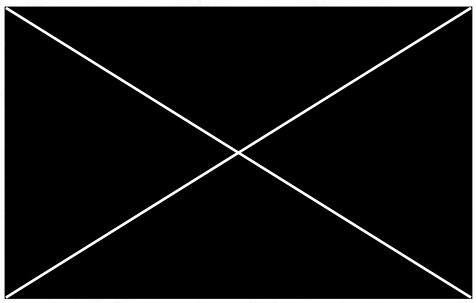
Esmelin Mendoza
NOTARY PUBLIC
Commexp 01/21/2028

Date: 3/8/2026

ESMELIN MENDOZA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19954006132
MY COMMISSION EXPIRES JANUARY 21, 2028

C-2

Hue Huynh



To Whom It May Concern,

I am writing this letter to formally appeal for leniency and to express my unwavering support for Thien Vo, who is currently in the custody of Immigration and Customs Enforcement (ICE). I am a naturalized U.S. citizen and a close personal partner of the respondent. I am submitting this statement to attest to his reformed character, his vital role in our community, and the devastating impact his removal would have on his young daughter and myself.

While I acknowledge that Vo Thien has made mistakes in the past, it is important to note that he has taken full responsibility for his actions. He served the time mandated by local law enforcement and used that experience as a turning point. Since his release, he has been a consistent, productive, and contributing member of society, demonstrating through his daily actions that he is committed to a law-abiding life.

His presence in the United States is not just a preference; it is a necessity for our family's stability. After the passing of my only relative in this state, I was left in a position of extreme emotional vulnerability. Vo Thien was the person who stepped

in to provide the emotional and practical support I needed to survive that hardship. He is my primary support system, and I am prepared to serve as his formal sponsor, providing him with a stable home and ensuring he meets all future legal obligations to the court.

Most critically, I ask you to consider the welfare of his daughter. Vo Thien is a dedicated single father who has raised her alone since her mother abandoned her at the hospital at birth. He has been her sole provider, protector, and nurturer for her entire life. To separate a child from the only parent she has ever known would cause her irreparable psychological and emotional trauma. There is no one else who can provide the level of care and stability that he provides for her daily.

Vo Thien is more than his past mistakes; he is a loyal friend, a devoted father, and a man who has worked hard to earn his place in this community. I humbly request that you exercise your discretion and grant him the opportunity to remain in the United States to continue raising his daughter and supporting our family.

Thank you for your time, your consideration, and your compassion.

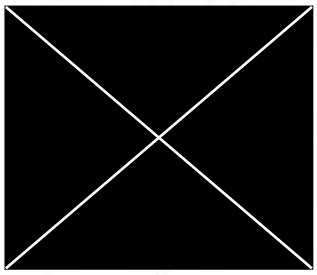
Sincerely,

3/12/26
Hue Huynh

State of Colorado County of Arapahoe
Subscribed and sworn before me on 3/12/26 (Date)
(Notary Signature)

CRISTIAN ALEXIS PERALTA M
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20254006510
MY COMMISSION EXPIRES FEBRUARY 18, 2029

Tan Vo



To Whom It May Concern,

My name is Tan Vo, and I am the youngest brother of Thien Van Vo. I was born in Denver, Colorado and have lived here most of my life. I am writing this letter in support of my brother and his immigration case.

My brother and I are about twenty years apart in age, and with eight siblings in our family we were not always the closest growing up. However, even with the age difference, he still had an influence on me and taught me important lessons about being a good person. From my perspective, I always saw how highly people in our community spoke about him. Friends and relatives enjoyed being around him because he had a warm personality and a way of bringing people together.

Whenever I talked with him growing up, he would always remind me how important it was to stay in school, avoid bad influences, and choose a career that would allow me to support myself and my family. He cared deeply about our family and always tried to make time for us.

One memory that has always stayed with me happened when I was young and fell down the stairs. My brother was in a hurry that day, but he immediately stopped what he was doing to come check on me and make sure I was okay. That moment showed me the type of person he was. He always made sure people around him were safe and cared for.

C-2

I believe the time he spent in prison changed him in many ways. But even through that difficult period, the good nature I always saw in him remained. Over the years he has shown that he wants to move forward and be a better person. His life since then has been about working hard and doing right by his family. He raised his daughter and has worked very hard in landscaping. At first I thought it might only be temporary work, but over the years it has become something he truly enjoys and takes pride in. People respect his work and appreciate the effort he puts into it.

I have honestly never met anyone who truly disliked my brother. He has always been a friendly and kind person who people enjoy being around. His personality and his willingness to help others make him someone who brings people together.

I believe losing him from our lives would deeply hurt our family and especially his daughter. My brother is not someone who represents the worst in society. Instead, he is someone who has worked hard to rebuild his life and do the best he can for the people around him. He has spent most of his life in the United States and is simply trying to continue living the life he has built here.

If our mother were still alive today, I truly believe she would be proud of how far he has come. From the challenges he faced as a young man to the person he has become today, he has shown resilience and determination to keep moving forward.

I respectfully ask that you reconsider allowing my brother to remain in this country, which has been his home for most of his life. Thank you for taking the time to read my letter and consider my brother's situation.

Sincerely,

Tan Vo

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: 3/8/2026.

State of Colorado
County of Arapahoe.
This Record was acknowledged before me on March 8th 2026
by. Vo Tan Thanh

Esmelin Mendoza
Notary public
Comm. exp. 01/21/2028

ESMELIN MENDOZA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19954006132
MY COMMISSION EXPIRES JANUARY 21, 2028