

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

**MONG TUYEN THI TRAN,**

*Petitioner,*

**V.**

**NIKITA BAKER, et al.**

**CAMILLA WAMSLEY, (Added)**  
**Director, Seattle Field Office, Immigration**  
**and Customs Enforcement;**

**TODD LYONS, (Added)**  
**Acting Director, U.S. Immigration &**  
**Customs Enforcement)**  
*in their official capacities,*

### *Respondents*

**FIRST AMENDED PETITION  
FOR WRIT OF HABEAS  
CORPUS<sup>1</sup>**

**ORAL ARGUMENT  
REQUESTED**

## INTRODUCTION

Petitioner Mong Tuyen Thi Tran asks this Court under 28 U.S.C. § 2241, and the United States Constitution, for relief from physical custody by United States Immigration and Customs Enforcement (“ICE”), an agency of the United States Department of Homeland Security (“DHS”). Ms. Tran asserts that she is being held unlawfully by ICE in violation of its own regulation, 8 C.F.R. § 241.13, governing *re-detainment* under an ICE Order of Supervision (“OSUP”). ICE is required to follow a series of steps before revoking an OSUP, 8 C.F.R. § 241.13(i)(2). Ms. Tran asserts that these steps

<sup>1</sup> The original Petition/Complaint filed May 17, 2025, was entitled “Complaint For Declaratory And Injunctive Relief, And Petition For Writ Of Habeas Corpus.” At this time, Petitioner is not pursuing the arguments under APA.

have not been followed and that she is entitled to immediate release. Ms. Tran also asserts that ICE, ultimately, will not be able to show legitimate changed circumstances establishing a “significant likelihood that the alien may be removed in the reasonably foreseeable future.” *Id.*

Ms. Tran was born in South Vietnam, came to the U.S. with her family and gained Lawful Permanent Resident (“LPR”) status. Around age 18 she was convicted of theft offenses that resulted in a deportation order in Immigration Court in 2004. ICE was unable to effectuate her deportation, however. Since the end of the Vietnam War in 1975, the Socialist Republic of Vietnam (“SRV”), had been unwilling to accept any U.S. deportees *if they had arrived in the U.S. before 1995*.<sup>2</sup> July 12, 1995, signified the countries’ re-established diplomatic relations.

The position of the SRV was the same in 2004, when ICE received the order of removal for Ms. Tran. ICE, therefore, required Ms. Tran to report to them per an OSUP. EX. 2 – DOJ-INS Order of Supervision for Ms. Tran, 7-21-2004. She followed the OSUP for twenty-one years then was stunned by being detained by ICE on May 12, 2025, when she reported as usual.

Ms. Tran remains detained, now at the Northwest ICE Processing Center in Tacoma, Washington, after stays in Baltimore, Louisiana, and Arizona since May 12. Ms. Tran’s petition should be granted because the government’s failure to follow its procedures for *re-detaining* a noncitizen means she is being held in violation of the laws of the United States.

---

<sup>2</sup> One explanation for this is that the groups of refugees who fled to the United States pre-1995 were more likely to have actively supported South Vietnam during the war.

### **JURISDICTION AND VENUE**

1. This action arises under the Constitution of the United States and the Immigration and Nationality Act (“INA”), 8 U.S.C. § 1101 *et seq.*
2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241, *et seq.* (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause) and may also grant relief under the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.
3. The writ of habeas corpus extends to Ms. Tran as she is a “prisoner” in the “custody under or by color of the authority of the United States” and is held “in violation of the Constitution or laws of the United States.” 28 U.S.C. § 2241(c)(1), (3).
4. Venue is proper in this district and division pursuant to 28 U.S.C. § 1391(b)(2) and (e)(1) because a substantial part of the events or omissions (initial contacts with ICE and subsequent detention) giving rise to Ms. Tran’s claims occurred in the ICE Field Office at 31 Hopkins Plaza in Baltimore, Maryland (the “Fallon Building”), and Ms. Tran normally resides in Hagerstown, Maryland with her family.<sup>3</sup>
5. This Court noted in an *Ex Parte* recorded telephone call on May 17, 2025 that jurisdiction would remain in this district even though ICE was moving Ms. Tran that same morning.

---

<sup>3</sup> See *Armentero v. INS*, 340 F.3d 1058, 1069-70 (9th Cir. 2003), *withdrawn on reh'g*, 382 F.3d 1153 (9th Cir. 2004) (explaining why “practicality, efficiency, and the interests of justice” demand relaxation of immediate custodian rule in habeas challenges to immigration detention); [*Argueta*] *Anariba v. Dir. Hudson Cnty. Corr. Ctr.*, 17 F.4th 434, 446 (3d Cir. 2021) (“[T]he District Court retained jurisdiction following Argueta’s transfer out of New Jersey because it already had acquired jurisdiction over Argueta’s properly filed habeas petition that named his then immediate custodian.”); and *Ex Parte Endo*, 323 U.S. 283, 304-05 (1944) (rejecting mootness after transfer because “there is no suggestion that there is no one within the jurisdiction of the District Court who is responsible for the detention of appellant and who would be an appropriate respondent”).

### **REQUIREMENTS OF 28 U.S.C. § 2243**

6. This Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return “within three days unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.*
7. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most important writ known to the constitutional law of England, affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963).

### **PARTIES**

8. Ms. Tran, Petitioner, was born in Bien Hoa, outside of Saigon,<sup>4</sup> South Vietnam on or about November 8, 1981.<sup>5</sup> When she was about 11 years old, she and her parents and brothers fled Vietnam, spent nine months in a Philippine refugee camp and arrived in the United States in 1993. She was granted Lawful Permanent Resident status and proceeded to excel in school. EX 1 – Declaration of Ms. Tran. Her parents, however, were rarely able to work because they did not speak English and were not literate in Vietnamese.
9. While attending college at George Mason University, Ms. Tran, 18, also worked at a local optometrist’s office. Desperate to please her first boyfriend, she gave in to his

---

<sup>4</sup> Saigon was renamed Ho Chi Minh City when the Viet Cong took over the city in 1975.

<sup>5</sup> Petitioner is presumed herein to be a citizen of the Socialist Republic of Vietnam (“SRV”), but neither she nor counsel have proof of this.

relentless pressure that she steal checks from her boss. She did so, *made the checks out to herself*, cashed them and gave her boyfriend the proceeds. In short order, she was convicted in Fairfax County, Virginia, Circuit Court of theft offenses in 2002 that made her removable. She received a three-year sentence, all suspended but four months. She resides in Hagerstown Maryland with her U.S. citizen husband, Dong Hoang, and their four U.S. citizen children, ages 19, 18, 10 and 6. One child is on the autism spectrum, and another is diagnosed with Functional Neurological Symptom Disorder with Speech Symptoms and with Weakness and Paralysis.

10. Respondent Nikita Baker is the Acting Baltimore Field Office Director (“FOD”) for ICE’s Enforcement and Removal Operations (“ERO”), which has jurisdiction over those detained in the Fallon Building and is responsible for enforcement and removal operations in Maryland. Ms. Tran was in the custody of the Baltimore Field Office, when the initial Petition was filed on May 17, 2025. Ms. Baker is sued in her official capacity.
11. Respondent Camilla Wamsley is the Seattle Field Office Director, Immigration and Customs Enforcement ERO, is responsible for enforcement and removal operations in Washington and has jurisdiction over those detained at the Northwest ICE Processing Center in Tacoma, Washington, where Ms. Tran is being held. She is sued in her official capacity.
12. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement, an agency within the Department of Homeland Security, that detains and deports non-citizens. He is a legal custodian of Petitioner. He is sued in his official capacity.

13. Respondent Kristi Noem is the Secretary of the U.S. Department of Homeland Security (“DHS”). She is responsible for the administration of the immigration laws under 8 U.S.C. § 1103 and oversees ICE operations. She is sued in her official capacity.
14. Respondent Pamela Bondi is the Attorney General of the United States. She is responsible for overseeing the Department of Justice, enforcing federal laws, and representing the United States in legal matters. She is sued in her official capacity.

## **I. BACKGROUND**

### **A. Ms. Tran’s Background and Criminal Conviction Consequences<sup>6</sup>**

15. Ms. Tran was born in Bien Hoa, outside Saigon in South Vietnam, a country that ceased to exist in 1975 – the end of the Vietnam War. The official name of the country now is the Socialist Republic of Vietnam (“SRV”); Saigon is now Ho Chi Minh City.<sup>7</sup>
16. Between 1992 and 1993 Ms. Tran and her family fled Vietnam and were placed in a refugee camp in the Philippines for about nine months EX 1 – Petr’s Declaration. ¶ 1, 2. They entered the United States in 1993. Her parents and brothers obtained Lawful Permanent Resident (“LPR”) status and both parents became U.S. citizens. She, too, was an LPR.
17. At age 18, Ms. Tran began college at George Mason University and was working several days a week for an optometrist. She also met a young man who paid some attention to her, and craving attention, fell in love with him – hard. *Id.* ¶ 3-5. Even knowing that he

---

<sup>6</sup> This information is taken largely from Petitioner’s Declaration, other exhibits as noted, and public information about Vietnam..

<sup>7</sup> Petitioner is concerned that she may be stateless and has asked counsel to research her situation in light of information on the SRV Consulate’s website. It appears to require people who may have lost their Vietnamese citizenship to regain it by registering to do so by July 1, 2014, *inter alia*: <https://vietnamembassy-usa.org/consular/instructions-registration-retain-vietnamese-citizenship>. She did not ever register for that. EX 6 – Screenshot of SRV Consulate’s Website. Petitioner has never had a passport from Vietnam or SRV. She was added to her mother’s passport for their entry into the U.S.

was also dating someone else, she did whatever she could for him. Even though he was emotionally and physically cruel to her, she wanted to do what he asked. *Id.*

18. Sadly, she did just that. She committed a crime by taking checks from her job and writing them out *to herself*, then cashed them at her bank, and gave the boyfriend the cash. The amount totaled over \$20,000, which she paid back, with interest over many years. *Id.* ¶ 5. She was convicted in Circuit Court for Fairfax County, given a three-year sentence, all suspended but four months. *Id.* ¶6. She could not return to live with her parents, however, because residents with criminal convictions are restricted in federal Section 8 housing.
19. She persevered with work, and soon met a hard-working Vietnamese immigrant while working in a nail salon. She and that man – Dung Hoang – married in 2004 and now have four children. *Id.*, *passim*. She returned to school and earned a B.S. in Health Sciences, with honors, from George Washington University, and spoke at the Health Sciences graduation ceremony. *Id.*, ¶ 16.
20. In the meantime, ICE began deportation proceedings against her in Immigration Court in Arlington, Virginia. She could not afford an attorney, but a friend from the Catholic Church she attended was an attorney and offered to help. He represented her in Immigration Court. Ultimately, she was ordered removed, as the Court found that the crimes were aggravated felonies.<sup>8</sup> By this time, Ms. Tran had learned that the SRV was not allowing Vietnamese to return as deportees and was greatly relieved. *Id.* ¶ 6.

#### **B. Travel Documents and Events Since May 12, 2025**

21. (From *Id.* ¶¶ 6-10):

---

<sup>8</sup> A crime of fraud or deceit with a loss over \$10,000 is an aggravated felony. INA § 101(a)(43).



We had heard that Vietnam was not accepting U.S. deportees, so I didn't think about appealing. I knew I could get a work permit, but that I couldn't get my green card back. I just assumed that that would be how I lived here: checking in every year and re-applying for a work permit. It was humiliating, but after being in jail and ICE detention, the check-ins paled in comparison. I never realized that I was at risk of deportation.

7. ICE simply told me that I'd be on an Order of Supervision since I couldn't be sent back. I reported in Arlington for a couple of years, I think, then they moved me to the Baltimore ICE office since I had moved to Maryland by then with my husband and children. I reported every 3 months at first, every 6 months at one point, by phone for a few years, then back to annually in-person, and weekly for a few weeks. All of this reporting took place from April 2004 to May 2025, or 21 years and 1 month.

#### Passport and Travel Document

8. When I was locked up in Baltimore on May 12, 2025, an ICE officer asked me to fill out a form with my address, family names, my kids ages, something about school, and the like. He said this was about "the process to get your travel document." He asked if I had my birth certificate, and I told him "no." I've been told I was born with a midwife, not a doctor and not in a hospital.
9. He next asked if I had my passport. I explained to him that I didn't have a passport, and had never had one. I told him that when I came with my family I was on my mom's passport and that Vietnam would not issue me one. When I traveled back there in 2000, I had to apply for a temporary re-entry permit from the U.S. to be able to leave and come back.
10. The only other mention of a travel document was on June 26, 2025, when an ICE officer came to talk to me. Unfortunately, he didn't know anything about my case or issues with Vietnam because he is based in Portland and is only in Tacoma for 30 days to help them catch up on paperwork. He told me he did not know if a travel document had been requested for me.

#### **C. The Memoranda of Understanding Between the U.S. and the SRV**

22. Eventually, in 2008, the countries agreed broadly in a Memorandum of Understanding what their policies were on the repatriation of Vietnamese refugees. EX 3 - MOU VN-US post 7-1995 arrivals, 1-22-2008. The SRV agreed that it would accept some U.S. deportees, but only if they had arrived after 1995. The SRV held firm, however, on its refusal to take back U.S. deportees who arrived within the first two decades after the war. *Id.* ICE could not effectuate a deportation and issued an Order of Supervision to Ms. Tran. EX 2 – DOJ INS OSUP 7-21-04.

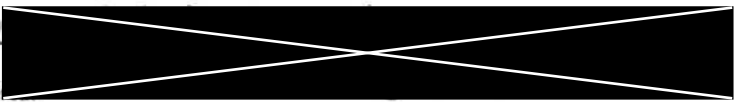


23. The 2008 MOU preamble states that it is “based on the legal principles of each country,” as well as the “international responsibility to accept the return of repatriated citizens; and the follow the recognized principles of international law, to allow for a case-by-case determination of repatriation, and to recognize the right of the receiving country to determine nationality.” *Id.*, 4<sup>th</sup> page of the document.
24. In Article 1, ¶ 1 of the 2008 MOU, the parties agree that repatriation of Vietnamese citizens “should take into account the humanitarian aspect, family unity and circumstances of each person in each individual case.” *Id.*, 4<sup>th</sup> page of the document.
25. Article 1, ¶ 2 of the MOU states: “The Vietnamese Government may consider the return of its citizens who violated U.S. law based on the consideration of legal procedures and the state and circumstances of each person in each individual case. *Id.*, 4<sup>th</sup> and 5<sup>th</sup> page of the document.
26. Article 1, ¶ 3, states: “Repatriation will be carried out in an orderly and safe way, and with respect for the individual human dignity of the person repatriated. The U.S. Government will allow Vietnamese citizens who have been ordered removed a reasonable time to arrange their personal affairs before returning them to Vietnam.”

### **ARGUMENT**

Since 2004, Ms. Tran has been faithfully obeying the OSUP from ICE. Reporting was sometimes at a kiosk, sometimes by telephone, often in person, and it varied in frequency. She upheld her part of the OSUP, The OSUP is a one-sided document, of course, because the non-citizen is being monitored and ICE is not. Below are the terms of her Orde. Please note that the

box for "That you assist the Immigration and Naturalization Service in obtaining any necessary travel documents" is NOT checked:

TRAN, Mong Tuyen 

04/16/2004, you were ordered:

☐ Excluded or deported pursuant to proceedings commenced prior to April 1, 1997.

☒ Removed pursuant to proceedings commenced on or after April 1, 1997.

Because the Service has not effected your deportation or removal during the period prescribed by law, it is ordered that you be placed under supervision and permitted to be at large under the following conditions:

☒ That you appear in person at the time and place specified, upon each and every request of the Service, for identification and for deportation or removal.

☒ That upon request of the Service, you appear for medical or psychiatric examination at the expense of the United States Government.

☒ That you provide information under oath about your nationality, circumstances, habits, associations, and activities and such other information as the Service considers appropriate.

☒ That you not travel outside the VA/DC/MD for more than 48 hours without first having notified this Service office of the dates and places of such proposed travel.

☒ That you furnish written notice to this Service office of any change of residence or employment within 48 hours of such change.

☒ That you report in person on the 21st of each month to this Service office at:  
REPORT TO THIS OFFICE ONCE A MONTH OF THE 21ST BETWEEN THE HOURS OF 08:30AM AND 12:00 Report to the Duty Window \*\*\*First report date is 08/21/2004 4420 N. Fairfax Drive, Arlington, Virginia 22203  
 unless you are granted written permission to report on another date. (202) 307-1572/1554

☐ That you assist the Immigration and Naturalization Service in obtaining any necessary travel documents.

☒ Other: \_\_\_\_\_

☐ See attached sheet containing other specified conditions (Continue on separate sheet if required)

Ashley M. Avery, DC  
 (Signature of INS official)

Full Document is EX 2 - DOJ INS Order of Supervision 7-21-04.

#### A. Requirements Of § 241.13(i)(2)

There is another side to the ICE part of the equation, however. That is the federal regulations that govern the OSUP procedures, and most relevant here, the procedure for *re-detaining* a person who has been compliant with the requirements. See, 8 CFR § 241.13 - *Determination of whether there*

*is a significant likelihood of removing a detained alien in the reasonably foreseeable future.*

These include notice to the noncitizen of OSUP revocation, establishing “changed circumstances” regarding the likelihood of removal, an interview with the noncitizen, and an opportunity for the non-citizen to respond to the reasons for revocation as stated in the notice. 8 CFR § 241.13(i) allows the revocation of an OSUP if the noncitizen has violated conditions of release. But absent a violation, the “The Service may revoke an alien's release under this section and return the alien to custody if, *on account of changed circumstances, the Service determines that there is a significant likelihood that the alien may be removed in the reasonably foreseeable future.*” 8 C.F.R. § 241.13(i)(2).

In addition to meeting the high standard of a “significant likelihood” of removal in the “reasonably foreseeable future,” the government has additional obligations under 8 C.F.R. § 241.13(i)(3):

“Upon revocation, [1] the alien will be notified of the reasons for revocation of his or her release. [2] The Service will conduct an initial informal interview promptly after his or her return to Service custody [3] to afford the alien an opportunity to respond to the reasons for revocation stated in the notification. [4] 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, or that he or she has not violated the order of supervision. [5] 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.”

(Numbered brackets added for emphasis). *See Kong v. United States*, 62 F.4th 608, 619–20 (1st Cir. 2023) (citing 8 C.F.R. § 241.13(i)(2)). None of these requirements were afforded Ms. Tran. It is possible that she was given a piece of paper constituting a notice in the Fallon Building detention rooms, but does not have any such paperwork now, nor any notice of the rights she had to challenge the process.

Respondents must establish a change of circumstances that has produced a significant likelihood that Ms. Tran will be removed to Vietnam in the reasonably foreseeable future pursuant to 8 C.F.R. § 241.13(i)(2). The burden is not on Ms. Tran to show otherwise; the burden is on ICE to show compliance with the regulation and that it can meet the high burden it faces.

“The plain language of the regulation, however, does not allow a court in the first instance to make the required individualized finding. To the extent ICE claims that it made such a determination, [a] court should review that claim in light of the regulations instructing ICE on how it should make such a determination.” *Kong*, 62 F.4th at 620 (citing 8 C.F.R. §§ 241.13(f), (i)(2)), as quoted in *Nguyen v. Hyde et al.*, 25-11470, Memorandum of Decision and Order, June 20, 2025, Judge Myong J. Joun.

#### **B. Effect of 2020 MOU Between U.S. and the SRV**

In *Nguyen v. Hyde, supra*, the District Court pointed out how challenging the burden can be for the government, even after the 5-year-old MOU from 2020:

Respondents do not even state how and whether the 2020 MOU applies to Mr. Nguyen specifically. It is significant to note that the 2020 MOU does not mandate that Vietnam accept all eligible pre-1995 Vietnamese refugees with orders of removal; it “constitutes an understanding *only* between the Participants and does not give rise to any rights or obligations under domestic or international law;” it “does not create or confer any rights, privileges, or benefits on any individual. (emphasis added). Thus, even assuming Mr. Nguyen 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. Thus, the 2020 MOU alone is not enough to show ICE has met their burden under 8 C.F.R. 241.13(i)(2).

Judge Joun also scrutinized the Respondents declaration regarding the number of Vietnamese removed to Vietnam in Fiscal Year 2024. He pointed out that the raw numbers of deportees were of no

use without information about the number of travel documents requested. Taken together, ICE's individualized determination to re-detain Ms. Tran is not in compliance with 8 C.F.R. § 241.13(f), (i)(2). And "ICE, like any agency, has the duty to follow its own federal regulations." *Rombot v. Souza*, 296 F. Supp. 3d 383, 388 (D. Mass. 2017) (cleaned up). As here, "where an immigration regulation is promulgated to protect a fundamental right derived from the Constitution or a federal statute . . . and [ICE] fails to adhere to it, the challenged [action] is invalid." *Id.* (cleaned up); *see also Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) ("The Fifth Amendment's Due Process Clause forbids the Government to 'depriv[e]' any 'person ... of ... liberty ... without due process of law.' Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that Clause protects."). Based on ICE's violations of its own regulations, I conclude that Ms. Tran's detention is unlawful and that his release is appropriate. *Id.* at 389 (allowing petitioner's motion for release upon a finding that ICE violated its regulations that implicated a fundamental constitutional right).

### REQUEST OF PETITIONER

Ms. Tran hereby respectfully requests that this Court grant her Petition for Writ of Habeas Corpus and Order Respondents to immediately release her from detention pursuant to the conditions in her preexisting Order of Supervision or, alternatively, issue an Order to Show Cause (OSC) to the respondents, unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

June 29, 2025

Respectfully Submitted,

**LAURA KELSEY RHODES, LLC**

/s/

Laura Kelsey Rhodes (D.Md. No. 12703)  
200-A Monroe Street, Suite 305  
Rockville, Maryland 20850  
(O) 301-424-0094 ♦ (C) 240-876-2409  
*LKR@LKRhodesLaw.com*

**CERTIFICATION UNDER FED. R. CIV. P. 11**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (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, modifying, or reversing 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 complaint otherwise complies with the requirements of Rule 11.

June 29, 2025

/s/

Laura Kelsey Rhodes (D.Md. No. 12703)

### CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2025, I filed a copy of the Petition for Writ of Habeas Corpus electronically via the CM/ECF system, causing it to be served on AUSA Thomas Corcoran, representing the below Respondents. I will also serve the Petition in due course, by certified mail, to the following individuals:

Nikita Baker, Acting Field Office Director  
U.S. ICE, ERO Baltimore Field Office  
31 Hopkins Plaza,  
6<sup>th</sup> Floor  
Baltimore, MD 21201

Todd Lyons, Director  
U.S. Immigration and Customs Enforcement, ERO  
500 12th St., SW  
Washington, D.C. 20536

Kristi Noem, Secretary  
U.S. Department of Homeland Security  
Office of the General Counsel  
2707 Martin Luther King Jr. Ave. SE  
Washington, D.C. 20536

Pamela Bondi, Attorney General  
U.S. Department of Justice 950  
Pennsylvania Ave. NW  
Washington, DC 20530-0001

Camilla Wamsley, Director  
Seattle Field Office  
Immigration & Customs  
Enforcement  
12500 Tukwila International Boulevard  
Seattle, WA 98168

June 29, 2025

/s/  
\_\_\_\_\_  
Laura Kelsey Rhodes  
D.Md. No. 12703  
Counsel for Petitioner