

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No. 25-02836 (LMP/JFD)

Va Vang	)	
	)	
Petitioner,	)	
	)	<b>DECLARATION OF</b>
	)	<b>RICHARD N. PRYD Jr</b>
v.	)	
	)	
James McHenry and Lisa Monaco,	)	
US Attorney General; Kristi Noem,	)	
Secretary of Department of Homeland	)	
Security; Peter Berg, Field Office Director	)	
For the Minneapolis Field Office; Warden	)	
Of Freeborn County Detention Center	)	
	)	
	)	
Respondents.	)	

Richard N. Pryd Jr, Supervisory Detention and Deportation Officer, United States Immigration and Customs Enforcement (“ICE”), Department of Homeland Security, for his declaration under 28 U. S. C. § 1746 hereby states as follows:

1. The following declaration is based on a review of the Subject’s alien file, statements, and e-mails.
2. I have been employed with ICE, Enforcement and Removal Operations (ERO) since October 17, 2007. On November 6, 2022, I was promoted to Supervisory Detention and Deportation Officer (SDDO).
3. As an SDDO, I supervise Deportation Officers (DO) assigned to the Custody

Management Unit at the St. Paul Field Office (ERO St. Paul). My duties include assigning case work and monitoring detained cases and dockets within SPM's responsibility to ensure detention, release and removal of aliens is lawful and within ICE policy.

4. Va Vang (VANG) is a citizen and national of Laos. VANG was admitted to the United States on or about August 25, 1976, as an immigrant. Attached as Exhibit 1 is a true and accurate copy of Petitioner's Form I-213 dated June 6, 2025.
5. On November 28, 2001, VANG was convicted in Winnebago County Circuit Court of Wisconsin for the offenses of as follows: 2nd Degree Recklessly Endangering Safety, False Imprisonment, Intimidate Victim/Use or Attempt Force, three counts of Battery, and Criminal Damage to Property. Attached as Exhibit 2 are true and accurate copies of Petitioner's conviction documents.
6. On December 28, 2005, VANG was extradited to Fresno, California to face criminal charges. On March 8, 2006, VANG was convicted in Fresno County Superior Court of California for the offenses as follows: Forcible Rape, Assault with Deadly Weapon, Kidnapping, Anal and Genital Penetration by Foreign Object, False Imprisonment by Violence, and Terrorist Threats with an offense date of January 21, 1994. See Exhibit 2.
7. On August 5, 2004, an immigration judge in Chicago, IL ordered VANG removed from the United States to Laos. Attached as Exhibit 3 is a true and accurate copy of the Order of the Immigration Judge dated August 5, 2004.
8. On January 15, 2009, VANG was paroled into ICE custody for removal following

the completion of his prison term at Centinela State Prison. On August 4, 2009, ERO El Centro released VANG on an Order of Supervision after it was determined by ERO Headquarters, Removal and International Operations (HQ/RIO), that there was no significant likelihood of removal in the reasonably foreseeable future (SLRRFF). Attached as Exhibit 4 is a true and accurate copy of Petitioner's Order of Supervision dated August 4, 2009.

9. On June 6, 2025, Special Agents from Homeland Security Investigations and the Internal Revenue Service arrest VANG in Menomonee Falls, WI and served him a Notice of Revocation of Release. VANG also participated in an informal interview later that day. Attached as Exhibit 5 is a true and accurate copy of Petitioner's Notice of Revocation of Release dated June 6, 2025.
10. On June 24, 2025, ERO St. Paul requested a travel document from the Government of Laos.
11. The Government of Laos has been cooperative with travel document issuance. Since January of 2025, ERO St. Paul has successfully removed 6 Laotians to Laos. The Laotian Government has not refused to issue a travel document for VANG or denied ERO St. Paul's request for VANG's travel document. VANG is similarly situated to the other citizens and nationals of Laos who have been successfully removed to Laos after travel document issuance by the Laotian Government. On this basis, I believe SLRRFF exists and VANG will be removed from the United States upon issuance of a travel document.
12. I declare under penalty of perjury under the laws of the United States of America that

the foregoing is true and correct.

13. Further your affiant sayeth not.

**RICHARD N PRYD JR** Digitally signed by RICHARD N  
PRYD JR  
Date: 2025.07.23 16:56:03 -05'00'

---

Richard N. Pryd Jr, SDDO  
U.S. Immigration and Customs Enforcement

July 23, 2025