

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**SANG NGUYEN,
Petitioner,**

v.

**PAM BONDI, U.S. Attorney General,
Respondent.**

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EP-25-CV-00323-KC

RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241

STATEMENT OF ISSUES

1. Whether Petitioner is lawfully detained in immigration custody.
2. Whether Respondent can show good cause for failing to comply with this Court's original show cause deadline.

Introduction

Respondent respectfully submits this response to Petitioner Sang Nguyen's petition for writ of habeas corpus under 28 U.S.C. § 2241 (the "Petition"), per this Court's Show Cause Order dated September 3, 2025 (ECF No. 6), and Order dated August 19, 2025 (ECF No. 2).

As a threshold matter, Respondent is now aware through this Court's recent order that the original response deadline for this habeas petition has already passed. *See* ECF No. 6. Respondent appreciates the Court's willingness to hear from Respondent regarding the reasons for this oversight. Respondent submits that there is good cause to excuse this error.

I. Good Cause Exists to Excuse Respondent's Failure to Comply with the September 2, 2025, Show Cause Deadline.

In its Show Cause Order, the Court ordered Respondent to explain her failure to respond to the Petition by the deadline of September 2, 2025 set forth in the August 19, 2025 Order. As explained below, Respondent inadvertently failed to comply with that deadline due to a mistaken assumption about the nature of the August 19, 2025 Order and oversight of the deadline. Respondent respectfully apologizes for this unintentional error.

In the August 19, 2025 Order, this Honorable Court ordered Respondent to "show cause by no later than September 2, 2025, why the application for a writ of habeas corpus should not be granted." ECF No. 2. ECF notice of the August 19, 2025 Order was sent via email to employees of the U.S. Attorney's Office. The description of the ECF notice identified the document as follows:

The following transaction was entered on 8/20/2025 at 3:22 PM CDT and filed on 8/19/2025

Case Name: Nguyen v. Bondi

Case Number: 3:25-cv-00323-KC

Filter:

Document Number: 2

Docket Text:

ORDER GRANTING [1] Motion for Leave to Proceed in forma pauperis Signed by Judge Kathleen Cardone. (mao)

3:25-cv-00323-KC Notice has been electronically mailed to:

Lacy L. McAndrew lacy.mcandrew@usdoj.gov, CaseView.ECF@usdoj.gov, erica.banda@usdoj.gov, keri.almonte@usdoj.gov, nita.brooke@usdoj.gov, stephanie.karam@usdoj.gov

3:25-cv-00323-KC Notice has been delivered by other means to:

Sang Nguyen

At 

ICE PROCESSING CENTER UNIT 7-D

8915 MONTANA AVE

EL PASO, TX 79925

The U.S. Attorney's Office mistakenly assumed, based upon the docket text, that the August 19, 2025 Order concerned only Petitioner's motion for leave to proceed *in forma pauperis*. The U.S. Attorney's Office failed to notice that the Order directed Respondent to respond to the Petition and set an immediate deadline. Any oversight at the U.S. Attorney's Office is often corrected with the arrival of a hard copy of a petition or Order in accordance with Rule 4 of the Federal Rules of Civil Procedure. However, such mailing is not customary in the El Paso Division, and this petition and Order have not been received via mail or hand-delivery as of the date of this filing.

Finally, Respondent respectfully notes the large volume of immigration-related petitions for writ of habeas corpus and/or writ of mandamus that the U.S. Attorney's for the Western District of Texas has received in recent months. Notably, since August 12, 2025, approximately eleven immigration-related petitions for writ of habeas corpus and three petitions for writ of mandamus have been filed in this District. The U.S. Attorney's Office has response deadlines in at least six of those matters, as well as deadlines in other pending civil immigration matters.

Respondent respectfully apologizes to the Court for her failure to respond by the deadline in the August 19, 2025 Order. The mistake was inadvertent.

Respondent appreciates this opportunity to provide an explanation and submit a substantive response to the habeas petition and prays that the Court excuse the mistake.

II. Relevant Facts and Procedural History.

Petitioner Nguyen filed this *pro se* habeas petition on or about August 15, 2025, seeking release from civil immigration detention, claiming that he was granted refugee status in the United States and that he has been a legal resident since 1986. *See* ECF No. 3 at 1. Petitioner alleges that he has lived in the United States for 39 years, having originally been brought to the United States from a refugee camp in Malaysia. *Id.* He claims that he is Vietnamese but that he is stateless because his parents did not register him with the Vietnamese government at the time of his birth due to the country being at war and not having a stable government. *Id.*

Petitioner claims that for the last 39 years, he has “reported to the U.S. immigration” regarding his whereabouts. *See id.* at 2. What Petitioner fails to mention in his habeas petition is that he is a convicted aggravated felon with a final order of removal entered against him in 2011 by an immigration judge in Arlington, Virginia, when he failed to appear for his removal hearing. *See* Ex. A (Removal Order). ICE avers that Petitioner was taken into custody on or about July 23, 2025. Ex. B (Sarellano Declaration). As such, ICE avers that Petitioner is in custody within the 90-day removal period which mandates his detention under 8 U.S.C. § 1231(a). *Id.*

Petitioner nonetheless seeks release from civil immigration detention, claiming that his detention is unlawful because he has legal status and has not committed a crime in the United States. ECF No. 3 at 1–2. Respondent, however, denies that Petitioner has any legal status in this country and avers that ICE is preparing to execute his final removal order. Ex. B (Sarellano Declaration). In that regard, Petitioner further claims that the United States will be unable to obtain a travel document from Vietnam to effectuate his removal. ECF No. 3 at 2. He also alleges that

ICE is violating his “Constitution[al] Rights, Fourth Amendment,” claiming his detention is without probable cause. *Id.* at 1.

Petitioner’s claims lack merit. He is lawfully detained with a final order of removal while ICE arranges his removal to Vietnam. 8 U.S.C. § 1231(a); *see* Ex. A (Order of Removal). Under § 1231(a), Petitioner’s post-order detention is mandatory for the first 90 days of the removal period. *Id.* Even beyond the 90-day removal period, any constitutional challenge to continued detention is not ripe until the alien has been detained in post-order custody for at least the presumptively reasonable period of six months. *See Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). Petitioner’s claims should be denied, because he is lawfully detained, and his constitutional claim is not ripe.

III. Petitioner Is Lawfully Detained with a Final Order of Removal.

As an alien with a final order of removal, Petitioner is detained under 8 U.S.C. § 1231(a) on a mandatory basis. This Petition should be denied for four distinct reasons. *First*, Petitioner fails to name the proper respondent to this habeas petition. *Second*, Petitioner’s detention is mandated by statute for at least 90 days and may be extended under certain circumstances. *Third*, this Court lacks jurisdiction to review Petitioner’s claims because they arise from a decision and action by the Attorney General to execute a final order of removal. *See* 8 U.S.C. § 1252(g). *Fourth*, any constitutional challenge to Petitioner’s custody is not ripe because he has not been in post-order custody for at least six months.

A. Petitioner Fails to Name the Proper Respondent.

Petitioner fails to name his immediate custodian in this habeas petition. ICE has authority over custody decisions for aliens detained in civil immigration custody under Title 8 of the U.S. Code, but the immediate custodian must be named as a respondent to the petition. *See, e.g.,*

Rumsfeld v. Padilla, 542 U.S. 426, 439–40 (2004); *Aguilar v. Johnson*, No. 3:25–CV–1904–K–BN, 2025 WL 2099201 at *1–2 (N.D. Tex. July 25, 2025) (collecting cases and citing *M.A.P.S. v. Garite*, --- F.R.D. ---, EP–25–00171–DB, 2025 WL 1479504 *6 (W.D. Tex. May 22, 2025)). At the time of filing this petition, Petitioner was detained in El Paso within the Western District of Texas. ECF No. 1 at 1. ICE has since transferred Petitioner within ICE custody to a facility in Angola, Louisiana. *See* Ex. B (Sarellano Declaration). Petitioner must list his immediate custodian having authority over his custody decisions to ensure timely compliance with any future court orders.

B. Petitioner’s Detention Is Mandatory Through October 21, 2025.

Petitioner is detained in ICE custody under 8 U.S.C. § 1231(a), because he has a final order of removal. *See* Ex. A (Removal Order). ICE’s detention authority under § 1231 is well-settled. *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). Once the order is final, the statute affords ICE a 90-day mandatory detention period within which to remove the alien from the United States following the entry of the final order. 8 U.S.C. § 1231(a)(2). Petitioner was not in DHS custody at the time of his removal order, and when he was apprehended in 2012, ICE released him on an Order of Supervision (OSUP), as removal to Vietnam was not likely during that time. Ex. B (Sarellano Declaration). At his check-in with ICE on July 23, 2025, ICE revoked the OSUP and took Petitioner into custody, because removal to Vietnam is now likely. *Id.* DHS has no obligation to release Petitioner during this 90-day period until the DHS Headquarters Post-Order Detention Unit has had the opportunity, during a six-month period, to determine whether there is a significant likelihood of removal in the reasonably foreseeable future. 8 C.F.R. §§ 241.13(b)(2)(ii); 241.13(f).

C. This Honorable Court Lacks Jurisdiction to Review Petitioner’s Claims because they arise from a Decision and Action by the Attorney General to Execute Petitioner’s Final Order of Removal.

As set forth below, the Petition should be denied for lack of jurisdiction to the extent Petitioner challenges the basis for his removal order or the decision to execute it. The REAL ID Act of 2005 divests district courts of jurisdiction over claims arising from a decision or action by the Attorney General to execute a removal order. 8 U.S.C. § 1252(g) (stating, in part, that “no court shall have jurisdiction to hear any cause or claim by or on behalf of any alien arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien under this chapter”). As the Supreme Court has explained, this jurisdiction-stripping provision applies to three discrete actions that the Attorney General may take: the “‘decision or action’ to ‘commence proceedings, *adjudicate* cases, or *execute* removal orders.’” *Reno v. Am.-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 482 (1999) (emphasis in original).

Here, Petitioner is subject to a final order of removal, *see* Ex. A, and he essentially seeks this Court’s review of a decision and action by the Attorney General to execute that order. Evaluating the merits of the Petition would require this Court to review “claim[s] . . . arising from the decision or action by the Attorney General to . . . execute [a] removal orders,” 8 U.S.C. § 1252(g). *See also Duron v. Johnson*, 898 F.3d 644, 647 (5th Cir. 2018). Under both statutory text and judicial precedent, § 1252(g) bars judicial review of ICE’s decisions in this context. *See Reno*, 525 U.S. at 482; *Velasquez v. Nielsen*, No. 18–40140, 2018 WL 5603610, at *4 (5th Cir. Oct. 29, 2018); *see also, generally, Idokogi v. Ashcroft*, 66 F. App’x 526 (5th Cir. 2003) (per curium); *Fabuluje v. Immigration & Naturalization Agency*, 244 F.3d 133 (5th Cir. 2000) (per curium); *Hidalgo-Mejia v. Pitts*, 343 F.Supp.3d 667, 673 (W.D. Tex. 2018). Because Petitioner’s claims arise from a decision and action by the Attorney General to execute a removal order, this Court lacks jurisdiction to review the Petition.

IV. Petitioner’s Due Process Claim Is Premature, as He has Not Been Detained in Post-Order Custody for the Presumptively Reasonable Period of Six Months.

Petitioner alleges his detention violates his liberty and Fourth Amendment rights under the Constitution. ECF No. 3, p. 1. Respondent construes this statement as a substantive due process claim. Respondent is actively seeking removal to Vietnam.¹ Not all removals can be accomplished in 90 days, and certain aliens may be detained beyond the 90-day removal period. *See Zadvydas*, 533 U.S. at 701. Under § 1231, the removal period can be extended in at least three circumstances. *See Glushchenko v. U.S. Dep’t of Homeland Sec.*, 566 F.Supp.3d 693, 703 (W.D. Tex. 2021). Extension is warranted, for example, if the alien fails to comply with removal efforts or presents a flight risk or other risk to the community. *Id.*; *see also* 8 U.S.C. § 1231(a)(1)(C); (a)(6). Where the alien challenges the discretionary basis for detention authority, that decision is protected from judicial review. 8 U.S.C. § 1252(a)(2)(B). An alien may be held in confinement until there is “no significant likelihood of removal in a reasonably foreseeable future.” *Zadvydas*, at 533 U.S. at 680.

Although Petitioner’s removal order became final in 2011, the 90-day removal period may be extended where ICE determines the alien is unlikely to comply with the removal order. *See Johnson v. Guzman-Chavez*, 594 U.S. 523, 528–29, 544 (2021); *see also* 8 C.F.R. § 1231(a)(6); 8 C.F.R. § 241.4. Continued detention under this provision is the “post-removal-period.” *Guzman-Chavez*, 594 U.S. at 529. The statute does not specify a time limit on this post-removal period, but the Supreme Court has read an implicit limitation into the statute and held that the alien may be detained only for a period reasonably necessary to remove the alien from the United States. *Id.*; 8

¹ The Court lacks jurisdiction to review which country ICE is considering for removal, because those negotiations are inextricably intertwined with ICE’s unreviewable authority to execute a final order of removal. *See, e.g., C.R.L. v. Dickerson, et al*, 4:25-CV-175-DL-AGH, 2025 WL 1800209 at *2-3 (M.D. Ga. June 30, 2025); *Diaz Turcios v. Oddo*, No. 3:25-CVC-0083, 2025 WL 1904384 at *5 (W.D. Pa. July 10, 2025).

C.F.R. § 241.13. Six months is the presumptively reasonable timeframe in the post-removal context. *Zadvydas*, 533 U.S. at 701. Although the Court recognized this presumptive period, *Zadvydas* “creates no specific limits on detention . . . as ‘an alien may be held in confinement until it has been determined that there is no significant likelihood of removal in the reasonably foreseeable future.’” *Andrade v. Gonzales*, 459 F.3d 538, 543 (5th Cir. 2006) (quoting *Zadvydas*, 533 U.S. at 701).

To state a claim for relief under *Zadvydas*, Petitioner must show that: (1) he is in DHS custody; (2) he has a final order of removal; (3) he has been detained in *post-removal-order* detention for six months or longer; and (4) there is no significant likelihood of removal in the reasonably foreseeable future. *Zadvydas*, 533 U.S. at 700. Petitioner does not and cannot make this showing, as he has been detained less than six months in post-order custody. Any due process claim under *Zadvydas* is, therefore, premature. *See Chance v. Napolitano*, 453 F. App’x 535, 2011 WL 6260210 at *1 (5th Cir. Dec. 15, 2011); *Agyei-Kodie v. Holder*, 418 F. App’x 317, 2011 WL 891071 at *1 (5th Cir. Mar. 15, 2011); *Gutierrez-Soto v. Sessions*, 317 F.Supp.3d 917, 929 n.33 (W.D. Tex. 2018); *Kasangaki v. Barr*, 2019 WL 13221026 at *3 (W.D. Tex. July 31, 2019).

In *Zadvydas*, the U.S. Supreme Court held that § 1231(a)(6) “read in light of the Constitution’s demands, limits an alien’s post-removal-period detention to a period reasonably necessary to bring about that alien’s removal from the United States” but “does not permit indefinite detention.” 533 U.S. at 689. “[O]nce removal is no longer reasonably foreseeable, continued detention is no longer authorized by the statute.” *Id.* at 699. The Court designated six months as a presumptively reasonable period of post-order detention but made clear that the presumption “does not mean that every alien not removed must be released after six months.” *Id.* at 701.

Once the alien establishes that he has been in post-order custody for more than six months at the time the habeas petition is filed, the alien must provide a “good reason” to believe that there is no significant likelihood of removal in the reasonably foreseeable future. *See Andrade*, 459 F.3d at 543–44; *Gonzalez v. Gills*, No. 20–60547, 2022 WL 1056099 at *1 (5th Cir. Apr. 8, 2022). Unless the alien establishes the requisite “good reason,” the burden will not shift to the government to prove otherwise. *Id.* There is no dispute that Petitioner has not been in custody for six months. *See* ECF No. 2, p. 2.

Even if his claim were ripe, Petitioner has a final order of removal that authorizes his detention under 8 U.S.C. § 1231(a). ICE denies that there is no likelihood of removal in the reasonably foreseeable future. *Id.* § 1231(a)(6). The “reasonably foreseeable future” is not a static concept; it is fluid and country-specific, depending in large part on country conditions and diplomatic relations. *Ali v. Johnson*, No. 3:21–CV–00050-M, 2021 WL 4897659 at *3 (N.D. Tex. Sept. 24, 2021).

Additionally, a lack of visible progress in the removal process does not satisfy the petitioner’s burden of showing that there is no significant likelihood of removal. *Id.* at *2 (collecting cases); *see also Idowu v. Ridge*, No. 3:03-CV-1293-R, 2003 WL 21805198, at *4 (N.D. Tex. Aug. 4, 2003). Conclusory allegations are also insufficient to meet the alien’s burden of proof. *Nagib v. Gonzales*, No. 3:06-CV-0294-G, 2006 WL 1499682, at *3 (N.D. Tex. May 31, 2006) (citing *Gonzalez v. Bureau of Immigration and Customs Enforcement*, No. 1:03-CV-178-C, 2004 WL 839654 (N.D. Tex. Apr. 20, 2004)). One court explained:

To carry his burden, [the] petitioner must present something beyond speculation and conjecture. To shift the burden to the government, [the] petitioner must demonstrate that “the circumstances of his status” or the existence of “particular individual barriers to his repatriation” to his country of origin are such that there is no significant likelihood of removal in the reasonably foreseeable future.

Idowu, 2003 WL 21805198, at *4 (citation omitted).

Even if Petitioner were to successfully meet his burden once the claim is ripe, there is significant likelihood of removal in the reasonably foreseeable future. See Ex. B (Sarellano Declaration). Petitioner's substantive due process claim fails here as a matter of law.

V. Conclusion

Petitioner is lawfully detained by statute, and his detention comports with the limited due process he is owed as a convicted aggravated felon with a final order of removal. This Court should deny the Petition.

Respectfully submitted,

Justin R. Simmons
United States Attorney

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Attorneys for Respondent

Certificate of Service

On September 5, 2025, I caused a copy of this filing to be served by mail on Petitioner, *pro se*, at the following address:

Sang Nguyen

A# 

Angola Detention Facility

17544 Tunica Trace

Angola, LA 70712

/s/ Lacy L. McAndrew

Lacy L. McAndrew

Assistant U.S. Attorney

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ARLINGTON, VIRGINIA

IN THE MATTER OF:
NGUYEN , SANG VAN

DATE: Sep 13, 2011

CASE NO. 

RESPONDENT IN REMOVAL PROCEEDINGS

DECISION

Jurisdiction was established in this matter by the filing of the Notice to Appear issued by the Department of Homeland Security, with the Executive Office for Immigration Review and by service upon the respondent. See 8 C.F.R. § 1003.14(a), 103.5a.

The respondent was provided written notification of the time, date and location of the respondent's removal hearing. The respondent was also provided a written warning that failure to attend this hearing, for other than exceptional circumstances, would result in the issuance of an order of removal in the respondent's absence provided that removability was established. Despite the written notification provided, the respondent failed to appear at his/her hearing, and no exceptional circumstances were shown for his/her failure to appear. This hearing was, therefore, conducted in absentia pursuant to section 240(b)(5)(A) of the Immigration and Nationality Act.

- ☐ At a prior hearing the respondent admitted the factual allegations in the Notice to Appear and conceded removability. I find removability established as charged.
- ☒ The Department of Homeland Security submitted documentary evidence relating to the respondent which established the truth of the factual allegations contained in the Notice to Appear. I find removability established as charged.

I further find that the respondent's failure to appear and proceed with any applications for relief from removal constitutes an abandonment of any pending applications and any applications the respondent may have been eligible to file. Those applications are deemed abandoned and denied for lack of prosecution. See Matter of Pearson, 13 I&N Dec. 152 (BIA 1969); Matter of Perez, 19 I&N Dec. 433 (BIA 1987); Matter of R-R, 20 I&N Dec. 547 (BIA 1992).

ORDER: The respondent shall be removed to Vietnam or in the alternative to on the charge(s) contained in the Notice to Appear.


THOMAS G. SNOW
Immigration Judge

cc: Assistant District Counsel
Attorney for Respondent/Respondent

GOVERNMENT
EXHIBIT

B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

Sang Nguyen	:	
	:	
<i>Petitioners,</i>	:	
	:	EP-25-CV-00323-KC
v.	:	
Pamela Bondi, United States Attorney	:	
General,	:	
	:	
<i>Respondent.</i>	:	
	:	

**DECLARATION OF
ASSISTANT FIELD OFFICE DIRECTOR MARTIN A. SARELLANO JR.**

Pursuant to the authority of 28 U.S.C. § 1746, I, Martin A. Sarellano Jr, Assistant Field Office Director (AFOD) for the U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) Office in El Paso, Texas, declare as follows:

1. I have been employed by DHS ICE in various roles since June 24, 2007. I have been an AFOD with the El Paso Field Office since August 2024. Prior to entering on duty as an AFOD with ERO El Paso, I was the Supervisor Detention and Deportation Officer (SDDO) for the Custody Management Unit (CMU) at the El Paso Processing Center (EPC) from October 2022 to August 2024, SDDO for the Albuquerque Sub-Office from August 2021 to October 2022, and SDDO for ERO New Orleans, Oakdale Sub-Office, from December 2020 until August 2021.

2. I am currently assigned to the El Paso Processing Center (EPC), Detained Docket Unit located in El Paso, Texas. At the Detained Docket Unit, I manage ERO personnel and provide oversight of all detained cases pending immigration proceedings at the EPC. As an AFOD, I am responsible for the supervision and oversight of ERO employees who manage the detained

population's case management, including detention and removal of illegal aliens at the EPC. I am responsible for the overall performance of the Detained Docket Unit to accomplish the ERO Mission.

3. The following information is based on my personal knowledge and my review of information obtained from other individuals employed by DHS, information obtained from government databases maintained by DHS, and other documents related to the case of Sang Nguyen.

4. Nguyen was ordered removed in absentia by an immigration judge in Alexandria, Virginia in 2011. ICE placed Nguyen under an Order of Supervision (OSUP) on or about November 30, 2012, after having been located by ICE ERO Fugitive Operations. At his most recent check-in on July 23, 2025, ICE decided to revoke the OSUP and take Nguyen back into custody. The basis for this revocation was that circumstances had changed such that there is significant likelihood of removal to Vietnam in the reasonably foreseeable future.

5. Nguyen was first admitted to the United States as a refugee in 1980, and he adjusted his status to lawful permanent resident (LPR) in 1982. In 2000, Nguyen applied for naturalization, and after failing the examination twice, Nguyen ultimately passed the examination on July 3, 2001. Before he could be sworn in as a naturalized citizen, immigration officers became aware of his undisclosed criminal convictions and issued him a Notice to Appear (NTA) in immigration court for removal proceedings. Nguyen failed to appear for his removal hearing in 2011, resulting in a final order of removal.

6. ICE records indicate that Nguyen has a 1993 conviction from California for Rape of a Spouse by Force, resulting in his incarceration followed by probation. In 1997, Nguyen was

convicted of Driving Under Intoxication and sentenced to 30 days in jail. Nguyen currently has an active felony warrant for a probation violation in California for failure to appear.

7. It is my understanding through information received by ICE Headquarters (HQ) Removal International Operations (RIO), that in 2025 ICE has successfully removed over 400 Vietnamese nationals to Vietnam. Vietnam is issuing travel documents on average within 30 days of the request. ICE submitted the travel document request for Nguyen on September 2, 2025. ICE anticipates no impediments to securing the travel document and repatriating Nguyen to Vietnam in the reasonably foreseeable future.

8. On September 4, 2025, ICE transferred Nguyen from the El Paso Processing Center to the Louisiana State Penitentiary in Angola, Louisiana, under a new agreement between ICE and the State of Louisiana to provide additional bedspace for criminal aliens in ICE custody. The warden of that facility is Kevin Jordan.¹ The AFOD with responsibility over the ERO New Orleans, Baton Rouge Sub-Office area is Lisa Fruge-Prudhome who oversees that facility.

I declare under penalty of perjury that the foregoing is true and correct. Signed on the 5th day of September, 2025.

MARTIN A
SARELLANO JR

Digitally signed by MARTIN A
SARELLANO JR
Date: 2025.09.05 14:03:02 -06'00'

Martin A. Sarellano Jr.
Assistant Field Office Director
U.S. Immigration and Customs Enforcement
El Paso, Texas

¹ See Louisiana State Penitentiary - Louisiana Department of Public Safety & Corrections (last accessed September 5, 2025).