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16 Attorneys for Respondents

17 **UNITED STATES DISTRICT COURT**
18 **SOUTHERN DISTRICT OF CALIFORNIA**

19 SISAWANG KHAMBOUNHEUANG,

20 Petitioner,

21 v.

22 KRISTI NOEM, Secretary of the
23 Department of Homeland Security;
24 PAMELA JO BONDI, Attorney General;
25 TODD LYONS, Acting Director,
26 Immigration and Customs Enforcement;
JESUS ROCHA, Acting Field Office
Director, San Diego Field Office;
CHRISTOPHER LAROSE, Warden at Otay
Mesa Detention Center,

27 Respondents.

28 Case No. 25-cv-02575-JO-SBC

29 **DECLARATION OF
30 ALEXANDER EBBA**

31 I, Alexander Ebba, pursuant to 28 U.S.C. § 1746, hereby declare under penalty
32 of perjury that the following statements are true and correct, to the best of my
33 knowledge, information, and belief:

34 1. I am currently employed by the U.S. Department of Homeland Security,
35 U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal

1 Operations (ERO), as a Deportation Officer (DO) assigned to the ICE ERO San Diego
2 Field Office. I have been a DO since September 20, 2015.

3 2. I currently am assigned to the Alternatives to Detention (ATD)/Non-
4 Detained Unit (NDU) of ICE ERO San Diego. My responsibilities include case
5 management of individuals on the non-detained docket and on ATD. I have access to
6 the official files and records of DHS.

7 3. I have reviewed the files and records maintained by DHS relating to
8 Petitioner Sisawang Khambounheuang (A 023-776-348).

9 4. On October 10, 2025, ERO obtained travel documents for Petitioner from
10 Laos, dated October 8, 2025, authorizing Petitioner to travel to Laos. ERO has now
11 confirmed Petitioner for a flight to Laos departing no later than November 4, 2025.

12 5. On October 27, 2025, Petitioner was notified by ERO to report to ERO
13 NDU on October 28, 2025.

14 6. On October 28, 2025, Petitioner reported to ERO NDU. I provided
15 Petitioner with a written notice that his release on an order of supervision will be
16 revoked on October 30, 2025. Petitioner was informed his order of supervision was
17 being revoked as ERO now has a confirmed flight for the Petitioner to Laos. Attached
18 to this declaration of Exhibit A is a true and correct copy of the written notice I provided
19 to Petitioner.

20 7. On October 28, 2025, Petitioner was provided an informal interview after
21 he was given notice that his order of supervision will be revoked and allowed an
22 opportunity to respond to the reasons for revocation. Attached to this declaration as
23 Exhibit B is a true and correct copy of the record of Petitioner's informal interview
24 dated October 28, 2025.

25 8. Petitioner was instructed to report back to ERO NDU on October 30, 2025,
26 and he will be taken into ICE custody on that date so that he can be processed for
27 removal to Laos.

28 9. I am aware of no reason that would prevent or delay Petitioner's scheduled

1 removal to Laos.

2 I declare under penalty of perjury of the laws of the United States of America that
3 the foregoing is true and correct.

4 Executed this 28th day of October 2025.

5 
6 ALEXANDER E
7 EBBA
8 Date: 2025.10.28
9 10:32:03 -07'00'

10 Alexander Ebba
11 Deportation Officer
12 ICE ERO San Diego Field Office
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EXHIBIT A

Office of Enforcement and Removal Operations

U.S. Department of Homeland Security
880 Front ST
San Diego, CA, 92101



**U.S. Immigration
and Customs
Enforcement**

Sisawang Khambounheuang

A [REDACTED]

Notice of Revocation of Release

This letter is to inform you that your order of supervision has been revoked, and you will be detained in the custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has been made based on a review of your official alien file and a determination that there are changed circumstances in your case.

ICE has determined that you can be expeditiously removed from the United States pursuant to the outstanding order of removal against you. ICE has obtained a valid travel document for your removal to Laos, and you are confirmed for a flight to Laos on or before November 04, 2025.

Based on the above, and pursuant to 8 C.F.R. § 241.13, your release on an order of supervision will be revoked on October 30, 2025. On that date you will be taken into ICE custody. You will be afforded an informal interview today at which you will be given an opportunity to respond to the reasons for the revocation. You may submit any evidence or information you wish to be reviewed in support of your release.

You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 U.S.C. Section 1253(a).

A handwritten signature in black ink, appearing to read "Nate [Signature]".

AFOD

Signature and Title of Authorized Official

10/28/2025

Date

Notice to Alien of Revocation of Release

A 

Page 2

PROOF OF SERVICE

(1) Personal Service

(a) I A. Ebba , Deportation Officer, Name of ICE Officer Title
certify that I served Sisawang Khambounheuang Name of detainee
this document at San Diego, CA ICE/ERO Non-Detained Office on 10/28/2025 at 0905
Institution Date Time

Detainee Signature:  Date: 10/28/2025

cc: Attorney of Record or Designated Representative
 cc: A-File

EXHIBIT B

ALIEN INFORMAL INTERVIEW

UPON REVOCATION OF ORDER OF SUPERVISION UNDER

8 C.F.R. § 241.4(l); 8 C.F.R. § 241.13(i)

SK

STATEMENT OF Khambounheuang, Sisawang [Detainee]

A File # ██████████

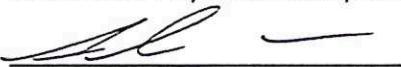
Detention Location San Diego, CA ICE/ERO Non-Detained Office

INTERVIEWING ICE OFFICER: A. Ebba, Deportation Officer, San Diego ICE/ERO Field Office
[Print Name, Title & Duty Station]

On 10/28/2025, I conducted an initial informal interview of the detainee listed above in order to afford the alien an opportunity to respond to the reasons for revocation of his or her order of supervision stated in the notification letter. At the interview, the alien made the following oral response regarding the reasons for revocation:

Khambounheuang, Sisawang (A. ██████████) requested for his release on order of supervision to not be revoked and to remain in the United States (US) permanently on order of supervision. Khambounheuang stated he has not committed any crimes while released on order of supervision. Khambounheuang stated he has not failed to appear for any of his scheduled Immigration and Customs Enforcement (ICE) appointments. Khambounheuang stated he has resided in the US since 1979 and that the US is his country. Khambounheuang stated he has never returned to Laos since entering the United States in 1979. Khambounheuang stated he does not want to be removed from the United States to Laos because he has no family in Laos. Khambounheuang stated his family resides in the United States. Khambounheuang stated he has (2) adult daughters that are United States citizens, (4) grandchildren, and an 84-year-old mother in which he has a close relationship with. Khambounheuang stated when he appeared for his immigration court hearing on July 17, 2000, the Immigration Judge offered to return his US legal permanent residence card. Khambounheuang stated that he refused the Immigration Judge's offer of his US legal permanent residence card because at the time, his wife served him with divorce documents. Khambounheuang stated he was not clearly thinking at the immigration court hearing and was heartbroken. Khambounheuang also stated at the immigration court hearing on July 17, 2000, he did not have legal representation nor a Lao interpreter.

The detainee [did] [did not] provide a written statement. The detainee [did] [did not] provide any documents. Any documents provided are attached.



Signature of Interviewing Officer

FOR INTERNAL USE ONLY

FOR INTERNAL USE ONLY