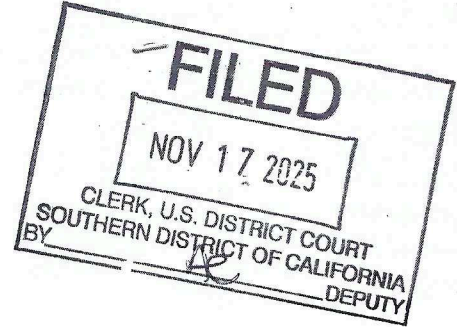


Ting Guang Wang/Pro Se



Otay Mesa Detention Center
PO Box 439049
San Diego, CA 92143



TING GUANG WANG,

Petitioner,

v.

CHRISTOPHER LaROSE, Warden of)
the Otay Mesa Detention Center;)
JOSEPH FREDEN, Acting Director)
of the Otay Mesa Field Office, U.S)
Immigration and Customs Enforcement;)
TODD M. LYONS, Acting Director of)
U.S Immigration Customs Enforcement;)
KRISTI NOEM, Secretary of the U.S)
Department of Homeland Security;)
PAMELA BONDI, Attorney)
General of the United States,)
Respondents.)

Case No: 25-cv-02894-TWR-DDL

Traverse To Respondents Opposition

Petitioner was ordered removed from the United States by an Immigration Judge on November 30, 2018. Nearly 7 months later after being in the custody of Immigration and Customs Enforcement (ICE), ICE on June 20, 2019 released the Petitioner on Supervision because ICE had failed to obtain travel documents for Mr. Wang and remove him from the United States.

On May 16, 2025 Petitioner was again taken into ICE custody where he still remains as of today. The Respondents claim that not only ICE notified the Petitioner about his Supervision being revoked, that they also had good reason to take Petitioner into custody because they were very confident in being able to obtain travel documents from China and remove the Petitioner from the United States. The letter that ICE provided Mr. Wang stating that his Supervision was being revoked is dated October 28, 2025. Mr. Wang was taken into custody on May 16, 2025, which means that for the last 5 months he's been in custody, his Supervision was not revoked due to changed circumstances and he should not have been in the custody of ICE. Furthermore, Respondents claim that ICE's confidence in their ability to secure travel documents and remove Petitioner Wang from the United States is considered "changed circumstances". The ability for someone to just believe in themselves to accomplish a goal is hardly any proof of actually executing the goal. ICE submitted a request for travel documents for Mr. Wang on May 19, 2025 and after learning that they (ICE) had made a mistake they re-submitted the paperwork requesting for travel documents again. These are documents that they did not provide and statements that cannot be verified. This reckless behavior by the Respondents hardly explains "changed circumstances". Petitioner has now been in ICE custody for five months, not the two months claimed by respondents, and ICE has yet again failed to obtain travel documents to remove the Petitioner.

Moreover, Respondents are very vague about certain information. They claim that they have been able to obtain travel documents for Chinese Nationals and remove them from the United States successfully however, they fail to tell the Court how many Chinese Nationals they had made requests for and how many were actually granted. Just because ICE submitted a request for travel documents does not mean that those travel documents will be approved. The Chinese Government must make that decision and we cannot just sit here and "assume" that said travel documents will be approved. ICE took Mr. Wang into custody under the determination of changed circumstances however there is no "changed circumstances" here. *Van Nguyen v. Hyde*.

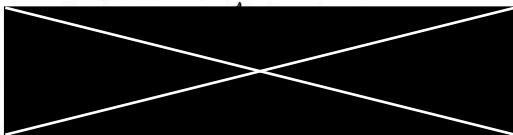
On November 18, 2018 Mr. Wang was ordered removed from the United States. On December 18, 2018 that order became administratively "final". Under *Zadvydas v. Davis*, the Courts clearly explain that time started ticking after December 18, 2018. ICE has had over six

years to obtain travel documents and remove the Petitioner from the United States. Petitioner has been on Supervised Release since 2018 and never violated his terms of agreement and the six months presumption has long lapsed. *Tadros v. Noem*, also see *Zavvar v. Nikita Scott*.

CONCLUSION:

Petitioner Wang's detention under *Zadvydas* is clearly unlawful. There were no "changed circumstances" when ICE decided to take Mr. Wang into custody and ICE new that. And after five months of being in custody, again there's still no changed circumstances. For the reasons said above Petitioner Wang respectfully request this Court for an evidentiary hearing.

Respectfully Submitted:

A black rectangular box with a white 'X' drawn across it from corner to corner, used to redact the signature.

Ting Guang Wang/Pro Se

November, 11, 2025