

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JIANDONG WU,

Petitioner,

v.

JUDITH ALMODOVAR, *et al.*,


Respondents.

Case No. 25 Civ. 8968 (GHW)

**DECLARATION OF  
DEPORTATION OFFICER  
SARWAR HUSSAIN**

Pursuant to 28 U.S.C. § 1746, I, Sarwar Hussain, hereby declare under penalty of perjury that the following is true and correct:

1. I am a Deportation Officer at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I have served in this capacity since July 30, 2025. As a Deportation Officer, I manage the cases of aliens who are in immigration proceedings. Once an alien is ordered removed from the United States, I facilitate the alien’s removal by coordinating with the government of that alien’s country of removal to obtain proper travel documents.

2. I have prepared this declaration in connection with a Petition for a Writ of Habeas Corpus filed by the petitioner, Jiandong Wu (“Petitioner” or “Wu”), on October 29, 2025. Wu has been assigned the following Alien Number:  I make this declaration in my official capacity, and the following representations are based on my review of Wu’s administrative file, consultation with my colleagues, and ICE electronic records and databases.

3. Wu is a native and citizen of the People’s Republic of China.

4. On or about September 21, 2023, a Border Patrol Agent with U.S. Customs and Border Protection (“CBP”) encountered Petitioner at or near Otay Mesa, California. After CBP

determined that Petitioner entered the United States without inspection, admission, or parole from an immigration officer, he was arrested and served with a Warrant for Arrest of Alien on September 22, 2023. That same day, CBP personally served petitioner with a Notice to Appear (“NTA”), which charged him as being inadmissible pursuant to Immigration and Nationality Act (“INA”) section 212(a)(6)(A)(i), 8 U.S.C. §1182(a)(6)(A)(i), as a noncitizen present in the U.S. without being admitted or paroled.

5. On September 22, 2023, Wu was then released on an Order of Release on Recognizance due to a lack of available bed space.

6. On March 28, 2024, the NTA was served on the Executive Office for Immigration Review, thereby commencing removal proceedings against Wu. Wu’s initial master calendar hearing was scheduled for May 1, 2024.

7. On April 25, 2024, Wu’s May 1, 2024, initial master calendar hearing was cancelled and rescheduled to February 9, 2026.

8. On August 12, 2024, Wu filed with the Immigration Court at 26 Federal Plaza, New York, New York (“26 Federal Plaza”) an application for relief from removal.

9. On September 30, 2024, Wu was told to report to ICE at 26 Federal Plaza on October 29, 2025, at 8:00 AM.

10. On October 29, 2025, Wu reported to ICE for a check-in at 26 Federal Plaza. At the check-in, ICE reviewed the status of Wu’s removal proceedings and took him into custody pursuant to INA § 235(b), 8 U.S.C. § 1225(b). Petitioner was served with a Warrant for Arrest of Alien (Form I-200), a separate form entitled “Important Information about Section 236(a) Initial Detention Decisions,” a copy of the Online detainee Locator System Privacy Notice, and a list of pro bono legal service providers.

11. On October 30, 2025, ICE transferred Wu to the Elizabeth Contract Detention Facility in Elizabeth, New Jersey, due space limitations, where he remains detained pursuant to INA § 235(b), 8 U.S.C. § 1225(b).

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, NY

This 13th day of November, 2025

**SARWAR**  
**HUSSAIN** Digitally signed by  
SARWAR HUSSAIN  
Date: 2025.11.13  
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Sarwar Hussain  
Deportation Officer  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security