UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

Hue Tac, a.k.a Hue Lam, Petitioner, vs. Todd Lyons, Acting Director, U.S. Immigration and Customs Enforcement, *et al.*, Respondents.	**CASE NO: 3:25-CV-00525-KC**

REPLY MEMORANDUM IN SUPPORT OF
PETITION FOR WRIT OF HABEAS CORPUS

Through the instant Reply Memorandum, Petitioner Hue Tac responds to the papers submitted in opposition to his Petition for Writ of Habeas Corpus by Respondents Lyons and De Anda-Ybarra, Doc No. 9, as contemplated by the Court's November 24, 2025 Order. Doc No. 10.

INTRODUCTION

The Fourth and Fifth Amendments to the United States Constitution require that law enforcement officers who arrest and detain an individual must support such conduct with an individualized, fact-based determination which provides a lawful basis for the state to deprive the arrestee of his liberty. This protection applies not only to police officers in their pursuit of suspected criminals but applies with equal force to arrests by U.S. Immigration and Customs Enforcement ("ICE") officers in their pursuit of noncitizens whom ICE suspects are violating the nation's immigration laws and whom ICE seeks to remove from the United States. Because civil immigration detention deprives noncitizens of their liberty for the narrow purpose of facilitating

their removal from the United States, ICE lacks a lawful basis to arrest or detain a noncitizen whom ICE knows cannot be so removed and – in the absence of a new administrative proceeding – must permit such a noncitizen to remain in society under conditions of supervised release.

Before ICE officers may re-arrest and re-detain such a noncitizen, ICE must support the arrest with an individualized, fact-based determination that the agency is now significantly likely to effect the noncitizen's removal from the United States in the reasonably foreseeable future. Alternatively, ICE may also re-arrest and re-detain such a noncitizen if ICE has made an individualized, fact-based determination that the noncitizen has violated the terms of his release and detention is necessary to enforce the agency's supervision of the noncitizen. In the absence of either of these two factual determinations, or a new administrative proceeding, ICE's arrest of the noncitizen violates the Fourth Amendment and the agency's continued custody of the noncitizen runs afoul of the Fifth Amendment as well as corresponding limitations placed on ICE's detention authority by the Immigration and Nationality Act ("INA") and its implementing regulations. This is the case of Petitioner Tac.

Mr. Tac immigrated to the United States as a refugee from Vietnam in 1981 and, as a result of his criminal conduct, was ordered removed from the United States by the U.S. Immigration Court in 1999. The legacy U.S. Immigration and Naturalization Service ("INS") held Mr. Tac in custody for over two years pursuant to Tac's 1999 removal order but the Socialist Republic of Vietnam declined to accept his repatriation. Accordingly, in 2001 the INS released Mr. Tac from immigration detention – pursuant to an administrative order of supervision ("2001 Order of Supervision") – because the INS could not remove Tac from the United States and thus Tac's ongoing civil detention served no lawful purpose. Based on this set of facts, the INS allowed Mr. Tac to reintegrate into society pursuant to the 2001 Order of Supervision.

Nearly 25 years later, in September of 2025, ICE – which had succeeded the INS as the nation's primary immigration law enforcement agency – re-detained Mr. Tac, without any warning, to investigate whether the Socialist Republic of Vietnam would change course concerning Tac's repatriation. Yet, at the time ICE officers arrested Mr. Tac, the agency had no fact-based reason to believe that the Socialist Republic of Vietnam was likely to allow Tac's repatriation. ICE had provided the Socialist Republic of Vietnam with no new information particular to Mr. Tac which might impact Vietnam's repatriation decision. And, to date, ICE can provide no fact-based reason as to why it believes the Socialist Republic of Vietnam is more likely to accept Mr. Tac now than in 2005. In the absence of such facts or a suggestion by ICE that Mr. Tac violated the conditions of the 2001 Order of Supervision, an assertion which ICE cannot make, Tac's continued detention runs afoul of the constitutional limitations which the Judicial Branch has for decades placed on civil immigration detention for noncitizens in circumstances like those of Tac and which are expressly incorporated into the INA through its implementing regulations.

Based on this record, Mr. Tac's current detention by ICE is unlawful and the Court should redress such unlawful conduct by ordering Tac's immediate release from ICE custody pursuant to the terms of the improperly revoked 2001 Order of Supervision.

STATEMENT OF FACTS

Mr. Tac immigrated to the United States as a refugee from Vietnam in 1981 and subsequently became a permanent resident of the United States. *See* Decl. of Janet H. Vo ("Vo Decl."), Doc No. 1-1, at ¶ 4 & Sub-Ex. A – p. 1; Decl. Regarding Hue Tac of Acting Ass't Field Off. Dir. Sergio Chavez ("Chavez Decl."), Doc No. 9-1, at ¶¶ 6-7. In February of 1999, the legacy INS took Mr. Tac into immigration custody directly following the end of a penal sentence which Tac was serving and which was related to controlled substances. *See* Vo Decl., Doc No. 1-1, at ¶

5 & Sub-Ex. B; *see also id.*, Doc No. 1-1, at Sub-Ex. A – p. 1. Shortly thereafter, in the same month, the Executive Office for Immigration Review ordered Mr. Tac's removal from the United States, to Vietnam. *See id.*, Doc No. 1-1, at ¶ 6 & Sub-Ex. C; *see also* Chavez Decl., Doc No. 9-1, at ¶¶ 11-12; Decl. of Hue Tac ("Tac Decl."), **Exhibit 1**, at ¶ 2.

In March of 1999, the INS formally requested that the Socialist Republic of Vietnam accept Mr. Tac for repatriation, but the Vietnamese government declined to do so.[1] *See* Vo Decl., Doc No. 1-1, at ¶ 7 & Sub-Ex. D; *see also* Tac Decl., **Exhibit 1**, at ¶ 3. In July of 2001, the INS determined that it was unable to remove Mr. Tac from the United States and, in August of 2001, released Tac from immigration detention pursuant to an administrative order of supervision, *i.e.*, the 2001 Order of Supervision. *See* Vo Decl., Doc No. 1-1, at ¶¶ 8-9 & Sub-Exhs. E-F; *see also* Chavez Decl., Doc No. 9-1, at ¶ 13; Tac Decl., **Exhibit 1**, at ¶ 3. For the last 24 years, Mr. Tac has stayed out of trouble and has done his best to comply with the 2001 Order of Supervision. *See id.*, **Exhibit 1**, at ¶ 4. Nevertheless, on or about September 14, 2025, officers from ICE – which had assumed the law enforcement role of the INS – took Mr. Tac back into immigration custody. *See* Chavez Decl., Doc No. 9-1, at ¶ 14; Tac Decl., **Exhibit 1**, at ¶ 5. At the time ICE officers arrested Mr. Tac, ICE had no fact-based reason to believe that Tac's circumstances vis-à-vis the Socialist Republic of Vietnam had changed such that the Vietnamese government or any other foreign government was likely to accept Tac for removal. *See, generally*, Decl. of Tin Thanh Nguyen ("Nguyen Decl."), **Exhibit 2**; *see also* Chavez Decl., Doc No. 9-1, at ¶¶ 15-18; Tac Decl., **Exhibit 1**, at ¶¶ 6-7. At present, ICE still has no fact-based reason – specific to Mr. Tac – which

[1] Between the end of the Vietnam War and 2008, the Socialist Republic of Vietnam refused the repatriation of any Vietnamese national who had been ordered removed from the United States. *See, e.g., Trinh v. Homan*, 466 F. Supp. 3d 1077, 1083 (C.D. Cal. 2020) (Carney, J.) (summarizing history of repatriation negotiations between Socialist Republic of Vietnam and United States).

supports an assertion that ICE is likely to remove Tac to the Socialist Republic of Vietnam or to any other country. *See* Nguyen Decl., **Exhibit 2**, at ¶¶ 6-13; Chavez Decl., Doc No. 9-1, at ¶¶ 15-18.

ARGUMENT

I. MR. TAC IS DETAINED FOR IMPERMISSIBLE REASONS, HIS DETENTION IS NOT AUTHORIZED BY LAW AND HE SHOULD BE RELEASED

When the INS released Mr. Tac from custody pursuant to the 2001 Order of Supervision, the agency did so because the only permissible reason for continuing Tac's detention was to effect his removal from the United States and the agency knew that it could not do so. Moreover, at the time it released Mr. Tac from custody, the INS knew that it had no other lawful option. Earlier that year, the U.S. Supreme Court had made clear in the landmark *Zadvydas* decision that the INS could only continue the detention of noncitizens with final removal orders if the noncitizen's actual removal from the United States was significantly likely to occur in the reasonably foreseeable future. *See Zadvydas v. Davis*, 533 U.S. 678, 699-700 (2001) ("... if removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by statute.") (citing INA Section 241(a)(6), 8 U.S.C. § 1231(a)(6)). Moreover, within months of the *Zadvydas* decision, the INS promulgated regulations implementing the requirements of that decision. *See* 8 C.F.R. § 241.13(g)(1) (requiring noncitizen to be released from immigration detention, absent special circumstances, if agency determines "there is no significant likelihood that the alien will be removed in the reasonably foreseeable future");[2] Continued Detention of

[2] Such special circumstances include a noncitizen who is implicated in terrorism, a noncitizen who is implicated in matters of national security or sensitive international relations, a noncitizen who carries a highly contagious disease which threatens public safety or a noncitizen who is an especially dangerous individual – none of which are applicable here. *See* 8 C.F.R. § 241.14.

Aliens Subject to Final Orders of Removal, 66 Fed. Reg. 56967, 56967-70 (Interim Rule Nov. 14, 2001) (attributing Regulation 241.13 to limitations on immigration detention articulated in *Zadvydas*). Accordingly, ICE's release of Mr. Tac from immigration custody in 2001 was not discretionary, but rather was compelled by the INA and the constitutional principles which animated the *Zadvydas* decision. In short, without a fact-based reason to believe that it could remove Mr. Tac from the United States, the INS had no lawful basis to continue his immigration detention. *See* Vo Decl., Doc No. 1-1, at Sub-Exhs. E-F; Chavez Decl., Doc No. 9-1, at ¶ 13.

This same legal regime which required the INS to release Mr. Tac from custody also restricted the circumstances in which the INS (or ICE) could resume Tac's immigration detention – that is, either because the agency had determined Tac's removal from the United States had become significantly likely to occur in the reasonably foreseeable future or because Tac's arrest was necessary to enforce the conditions of his 2001 Order of Supervision. *See* 8 C.F.R. §§ 241.13(*i*)(1), (2). Under this regime, if the INS (or ICE) were to require Mr. Tac's assistance in investigating the possibility that the Socialist Republic of Vietnam or perhaps a third country might accept Tac for removal, the agency would not be permitted to re-detain Tac to further the investigation. Rather, as outlined in the 2001 Order of Supervision, the INS (or ICE) would direct Mr. Tac to "appear in person at the time and place specified," to assist "in obtaining any necessary travel documents" or to otherwise cooperate with the agency's investigative efforts. Vo Decl., Doc No. 1-1, at Sub-Ex. F. Moreover, upon a positive repatriation decision, Mr. Tac's release documents do not contemplate his immediate, surprise detention but rather expressly provide that Tac will have "an opportunity to prepare for an orderly departure." *Id.*, Doc No. 1-1, at Sub-Ex. E – p. 1. And, if Mr. Tac were to refuse to cooperate with the INS's (or ICE's) efforts at any stage in the investigatory process, the agency would be authorized to re-detain Tac immediately for

violating the conditions of the 2001 Order of Supervision. *See* 8 C.F.R. § 241.13(*i*)(1); *Zadvydas*, 533 U.S. at 695 ("...we nowhere deny the right of Congress to ... subject [noncitizens] to supervision with conditions when released from detention, or to incarcerate them where appropriate for violations of those conditions."). Yet ICE followed none of these rules when its agents, without warning, arrested and detained Mr. Tac in September of 2025 for the purpose of exploring whether the Socialist Republic of Vietnam might reconsider its prior refusal to accept Tac for repatriation after having declined to do so for more than two decades. *See* Chavez Decl., Doc No. 9-1, at ¶¶ 14-17. On such a record, both Mr. Tac's arrest as well as subsequent detention were and continue to be unlawful.

A. U.S. Immigration and Customs Enforcement ("ICE") Had and Continues to Have No Fact-Based Reason to Believe that It Can Effect Tac's Removal from the United States in the Reasonably Foreseeable Future.

To lawfully revoke the 2001 Order of Supervision and return Mr. Tac to immigration custody for the purpose of facilitating Tac's removal, ICE was obligated to adduce specific facts supporting "(1) an individualized determination (2) by ICE that, (3) based on changed circumstances, (4) removal has become significantly likely in the reasonably foreseeable future." *Kong v. U.S.*, 62 F.4th 608, 619-20 (1st Cir. 2023) (citing 8 C.F.R. § 241.13(*i*)(2)); *see also, e.g.*, *Hernandez Escalante v. Noem*, 2025 WL 2206113, *3 (E.D. Tex. Aug. 2, 2025) (Truncale, J.) ("These regulations clearly indicate, upon revocation of supervised release, it is [ICE's] burden to show a significant likelihood that the alien may be removed"); *Abuelhawa v. Noem*, 2025 WL 2937692, *8 (S.D. Tex. Oct. 16, 2025) (Eskridge, J.) (collecting recently decided cases).[3] As

[3] Outside of the First Circuit, U.S. District Courts do not agree whether U.S. Immigration and Customs Enforcement ("ICE") bears the burden of justifying the re-detention of a noncitizen like Mr. Tac or whether the noncitizen bears the burden of justifying his release. *See, e.g., Trejo Trejo v. Warden of ERO El Paso E. Montana*, -- F. Supp. 3d --, 2025 WL 2992187, *4-5 (W.D. Tex. 2025) (Cardone, J.) (placing initial burden on noncitizen); *Nguyen v. Scott*, -- F. Supp. 3d --, 2025

described in detail by the Declaration of Tin Thanh Nguyen, the process through which the Socialist Republic of Vietnam considers the repatriation of Vietnamese nationals like Mr. Tac – that is, those who arrived in the United States before 1995 – requires a highly individualized and completely discretionary determination, the outcome of which no one outside of the Vietnamese Ministry of Public Security can possibly predict. *See* Nguyen Decl., **Exhibit 2**, at ¶¶ 7-13; *see also*, *e.g.*, *Nguyen v. Hyde*, 788 F. Supp. 3d 144, 151 (D. Mass. 2025) (Joun, J.) (analyzing operative repatriation memorandum and finding "Vietnam has total discretion whether to issue a travel document to any individual."); *Phan v. Beccerra*, 2025 WL 1993735, *4 (E.D. Cal. Jul. 16, 2025) (Coggins, J.) (same). For this reason, numerous U.S. District Courts have determined that ICE cannot meet its burden to re-detain Vietnamese nationals like Mr. Tac until after the Socialist Republic of Vietnam has issued a travel document to the noncitizen or has otherwise signaled a positive repatriation determination. *See*, *e.g.*, *Nguyen*, 788 F. Supp. 3d at 153 (ordering release of pre-1995 Vietnamese refugee from ICE custody until Vietnamese travel document is issued); *Vu*

WL 2419288, *12-13 (W.D. Wash. 2025) (Cartwright, J.) (same). Moreover, outside of the First Circuit, U.S. District Courts do not agree on the precise contours of the burden which ICE must meet before re-detaining a noncitizen like Mr. Tac. *See*, *e.g.*, *Nguyen v. Noem*, -- F. Supp. 3d --, 2025WL 2737803, *7-9 (W.D. Tex. 2025) (Hendrix, J.) (rejecting assertion that re-detention of noncitizen pursuant to 8 C.F.R. § 241.13(*i*) requires "individualized determination"). However, the application of basic Fourth Amendment principles to the arrest of noncitizens like Mr. Tac leads to the conclusion that ICE's arrest of such noncitizens – as with any law enforcement arrest – must be supported by a fact-based reason to justify the arrest which is particular to the arrested individual and which is adduced by the arresting officer prior to effecting the arrest – *i.e.*, probable cause. *See City of El Cenizo, Tex. v. Tex.*, 890 F.3d 164, 187-90 (5th Cir. 2018) (ICE arrests must be supported by probable cause); *Blake v. Lambert*, 921 F.3d 215, 220-22 (5th Cir. 2019) (burden of adducing probable cause rests with arresting officer); *Williams v. Kaufman County*, 352 F.3d 994, 1003-05 (5th Cir. 2003) (probable cause determination must be individualized to arrestee). In the case of a noncitizen like Mr. Tac, the Fourth Amendment places the burden squarely on ICE to make an individualized, fact-based determination that the noncitizen has violated a condition of his release or has become significantly likely to be removed from the United States in the reasonably foreseeable future before re-detaining that noncitizen. *See* 8 C.F.R. §§ 241.13(*i*)(1)-(2).

v. Noem, 2025 WL 3114341, *10 (E.D. Cal. Nov. 6, 2025) (Sherriff, J.) (same); *cf. Nguyen v. Noem*, -- F. Supp. 3d --, 2025WL 2737803, *12-13 (W.D. Tex. 2025) (Hendrix, J.) (denying release of pre-1995 Vietnamese refugee from ICE custody when travel document had been issued). And on the present record ICE has once again failed to meet this burden.

ICE did not arrest Mr. Tac to prepare him for removal to Vietnam because both at the time of Tac's arrest and at present the agency had and continues to have no idea whether the Socialist Republic of Vietnam will accept Tac for repatriation. *See* Nguyen Decl., **Exhibit 2**, at ¶ 11. Put another way, ICE's supposed determination that Mr. Tac "could now be removed to Vietnam in the reasonably foreseeable future" and its current assessment that there will be no "impediments to securing [a] travel document and repatriating Tac to Vietnam in the reasonably foreseeable future" are both baseless. Chavez Decl., Doc No. 9-1, at ¶¶ 15, 17. ICE's actual motive for detaining Mr. Tac is for the unlawful purpose of circumventing the procedures outlined in the 2001 Order of Supervision so that the agency can force Tac to participate in its repatriation investigation while Tac is detained.[4] *See id.*, Doc No. 9-1, at ¶¶ 15-17. That is to say, ICE arrested and detained Mr. Tac by surprise to compel him to complete paperwork that would determine if the Socialist Republic of Vietnam might change course and accept Tac for repatriation after having declined to do so for nearly 25 years. *See id.*, Doc No. 9-1, at ¶¶ 13-17. Indeed, ICE has now detained Mr. Tac for more than two months and is still preparing Tac's paperwork. *See id.*, Doc No. 9-1, at ¶

[4] ICE not only circumvented the procedures contemplated by Mr. Tac's 2001 release papers, but completely disregarded the agency's own regulations when ICE officers arrested Tac and failed to provide him with any reason for the arrest until after Tac had been detained for nearly two months, that is, directly following Tac's initiation of the above-captioned proceeding. *Compare* Decl. Regarding Hue Tac of Acting Ass't Field Off. Dir. Sergio Chavez, Doc No. 9-1, at ¶¶ 14-15 *and* 8 C.F.R. § 241.13(*i*)(3) (outlining required arrest procedures); *see also* Decl. of Claire Maguire, **Exhibit 3**, ¶ 4 & Sub-Ex. A. As this Court has noted, "[s]ome courts have found such a failure to be, in and of itself, a violation of due process mandating habeas relief." *Nguyen v. Bondi*, 2025 WL 3120516, n.4 (W.D. Tex. Nov. 7, 2025) (Cardone, J.) (collecting cases).

17. In this way, Mr. Tac's detention violated and continues to violate the INA, its implementing regulations and the constitutional principles which animated the *Zadvydas* decision, given that ICE did not detain Tac for the permissible purpose of actually removing him to Vietnam. Rather, ICE arrested and is detaining Mr. Tac for the impermissible purpose of investigating whether the Socialist Republic of Vietnam might reconsider Tac's repatriation and thus whether the agency has a sufficient factual basis to justify Tac's detention. *See*, *supra*, n.3. Absent another lawful basis for Mr. Tac's detention (and there is none), the Court should reinstate Tac's improperly revoked 2001 Order of Supervision and require his immediate release from ICE custody.

B. ICE's Asserted Arguments Have No Bearing on Mr. Tac's Entitlement to Release.

In their opposition papers, Respondents Lyons and De Anda-Ybarra provide one fact to support their assertion that Mr. Tac is significantly likely to be removed to Vietnam in the reasonably foreseeable future – *i.e.*, because ICE has succeeded in removing over 400 Vietnamese nationals this year and the agency hopes Tac's proposed removal will follow suit. *See* Doc No. 9 at pp. 5-6; *see also* Chavez Decl., Doc No. 9-1, at ¶¶ 16-17. However, as this Court has previously noted, such assertions offer no insight into whether Mr. Tac's removal to Vietnam is significantly likely to occur in the reasonably foreseeable future, insofar as the proffered statistics make no distinction between Vietnamese nationals in general and those Vietnamese refugees who arrived to the United States before 1995 and who have been exceedingly difficult to repatriate. *See Nguyen v. Bondi*, 2025 WL 3120516, *7 (W.D. Tex. Nov. 7, 2025) (Cardone, J.) (collecting cases); Nguyen Decl., **Exhibit 2**, at ¶¶ 7-13. ICE's remaining arguments either misstate applicable law by asserting that Mr. Tac bears the burden of justifying his release from detention (and he does not),

see, *supra*, Section I.A,[5] or sets up and knocks down a strawman by attacking a procedural due process claim that Tac has not asserted in his Petition.[6] *See* Doc No. 9 at pp. 2-7. Without more, the Court should reinstate Mr. Tac's improperly revoked 2001 Order of Supervision and require his immediate release from ICE custody.

CONCLUSION

Based on the foregoing, Mr. Tac respectfully reiterates his request that the Court grant his Petition and issue a writ reinstating the improperly revoked 2001 Order of Supervision as well as requiring Tac's immediate release from detention.

Respectfully submitted,
HUE TAC,

Dated: November 26, 2025

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[5] Even if ICE's assessment of the law were correct and this burden were Mr. Tac's to bear, Tac already spent more than two years in immigration detention following the issuance of his removal order. *See* Decl. of Janet H. Vo, Doc No. 1-1, at Sub-Exhs. B-F; Decl. of Hue Tac, **Exhibit 1**, at ¶¶ 2-4. Thus, Mr. Tac's current post-removal-order detention – when combined with his previous post-removal-order detention – is more than sufficient under *Zadvydas v. Davis*, 533 U.S. 678 (2001) to shift the burden onto ICE to explain why Tac's removal is significantly likely to occur in the reasonably foreseeable future so as to justify Tac's current detention. *See*, *e.g.*, *Abuelhawa v. Noem*, 2025 WL 2937692, *4 (S.D. Tex. Oct. 16, 2025) (Eskridge, J.) ("Most courts to consider the issue have concluded that the *Zadvydas* period is cumulative …"); *Nguyen v. Warden*, 2025 WL 2971654, *2 (S.D. Cal. Oct. 21, 2025) (Schopler, J.) ("… district courts appear to have unanimously held that the six-month period does not reset when the government detains an alien under 8 U.S.C. § 1231(a), releases him from detention, and then re-detains him again.") (internal quotation omitted).

[6] Nevertheless, as described above, *supra*, n.4, ICE has also violated Mr. Tac's Procedural Due Process rights. *See Zadvydas*, 533 U.S. at 724 (Kennedy, J.) (diss.) ("Were [immigration authorities], in an arbitrary or categorical manner, to deny an alien access to the administrative processes in place to review continued detention, habeas jurisdiction would lie to redress the due process violation caused by the denial of the mandated procedures …").

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CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2025, the foregoing Memorandum and Exhibits specifically referenced therein were electronically filed with the Clerk of the Court through the CM/ECF system, which will send notification of such filing to registered participants, including counsel for Respondents Lyons and De Anda-Ybarra. I also hereby certify that on November 26, 2025, the foregoing Memorandum and Exhibits were served via first-class mail upon Respondent Warden of the Camp East Montana Detention Facility at his/her address of record:

Camp East Montana Detention Facility
Attn: Warden
6920 Digital Road
El Paso TX 79936

/s/ Ethan R. Horowitz

Dated: November 26, 2025

Ethan R. Horowitz