

1 ADAM GORDON
United States Attorney
2 KELLY A. REIS
Assistant U.S. Attorney
3 California Bar No. 334496
Office of the U.S. Attorney
4 880 Front Street, Room 6293
San Diego, CA 92101-8893
5 Tel: (619) 546-8767
6 Fax: (619) 546-7751
Email: kelly.reis@usdoj.gov

7 Attorneys for Respondents

8
9
10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 TAI TRUONG,

13 Petitioner,

14 v.

15 KRISTI NOEM, Secretary of the
Department of Homeland Security, *et*
16 *al.*,

17 Respondents.

Case No.: 25-cv-3189-JES-MMP

DECLARATION OF RYAN SMITH

18
19 I, Ryan Smith, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury
20 that the following statements are true and correct, to the best of my knowledge, information,
21 and belief:

22 1. I am currently employed by the U.S. Department of Homeland Security (DHS),
23 U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations
24 (ERO), as a Deportation Officer (DO) assigned to the Otay Mesa suboffice of the ICE ERO
25 San Diego Field Office.

26 2. I have been employed by ICE as a law enforcement officer since April 2020,
27 serving as a DO since April 2020. I currently remain serving in that position. As a DO, I am
28 responsible for, among other things, case management of individuals detained by ICE at

1 Otay Mesa Detention Center in Otay Mesa, California. I have access to government
2 databases and documentation relating to Petitioner Tai Truong (Petitioner). This declaration
3 is based upon my personal knowledge and experience as a law enforcement officer and
4 information provided to me in my official capacity as a DO for the Otay Mesa suboffice of
5 the ICE ERO San Diego Field Office.

6 3. On November 26, 2025, Laos issued a new travel document for Petitioner. ICE
7 ERO is in possession of Petitioner's Laotian travel document.

8 4. ICE ERO has scheduled Petitioner's removal to Laos occur no later than
9 December 16, 2025.

10
11 I declare under penalty of perjury of the laws of the United States of America that the
12 foregoing is true and correct.

13 Executed this 2nd day of December 2025.

14 RYAN R
15 SMITH

Digitally signed by
RYAN R SMITH
Date: 2025.12.02
14:10:03 -08'00'

16 Ryan Smith
17 Deportation Officer
18 San Diego Field Office
19
20
21
22
23
24
25
26
27
28