

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THACH WANA,

Petitioner,

vs.

PAMELA BONDI, Attorney General of
the United States; KRISTI NOEM,
Secretary, United States Department of
Homeland Security; CAMMILLA
WAMSLEY, Seattle Field Office
Director, United States Citizenship and
Immigration Services; BRUCE SCOTT,
Warden of Immigration Detention
Facility; and the United States
Immigration and Customs Enforcement,

Respondents.

No.

**PETITION FOR WRIT OF HABEAS
CORPUS UNDER 28 U.S.C. § 2241
AND REQUEST FOR INJUNCTIVE
RELIEF**

PRELIMINARY MATTERS

Under 28 U.S.C. § 2243, the Court must grant a petition for writ of habeas corpus or issue an order to show cause (OSC) to the Respondents “forthwith,” unless Petitioner is not entitled to relief. If an OSC is issued, the Court must require Respondents to file a return “within three days unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.*

Petitioner recognizes that three days may not be feasible. Petitioner suggests that the Court order Respondents to file a return within five days and order Petitioner to file a reply within five days thereafter.

Furthermore, Petitioner asks this Court to order Respondents not to remove Petitioner from this district while this case is pending, both “[b]ecause transfer of

Petitioner to another district could interfere with his access to counsel and ability to participate in the proceedings,” *Tran v. Bondi, et al.*, No. CV25-1897-JLR-BAT, dkt. 6 at 3 (W.D. Wash. Oct. 7, 2025) (*sua sponte* issuing such an order in a § 2241 case involving an ICE detainee), and “under the Court’s inherent power to preserve its ability to hear the case.” *Alves v. U.S. Dep’t of Just.*, No. EP-25-CV-306-KC, 2025 WL 2629763, at *5 (W.D. Tex. Sept. 12, 2025) (same). *See also M.M. v. Wamsley*, No. CV25-2074-TMC, 2025 WL 3053023, at *1 (W.D. Wash. Oct. 31, 2025) (same).¹

RECITATIONS TO SUBSTANTIALLY CONFORM TO AO 242

Personal Information

1. (a) Thach Wana
- (b) Other names used: Wana Thach; Thach Wana Matias
2. Place of confinement:
 - (a) Northwest Immigration Processing Center (NWIPC).
 - (b) 1623 East J Street, Tacoma, Washington 98241-1615, pursuant to a contractual arrangement with my custodian, the Immigration and Customs Enforcement Field Office Director at Seattle, Washington.
 - (c) Case number or numbers [ICE file number, if known]: A# 
3. I am currently being held on orders by federal authorities: United States Immigration and Customs Enforcement.
4. I am currently being held on an immigration charge.

¹ For just a few examples of other courts issuing such an order in § 2241 cases involving ICE detainees within the past few months (or reflecting the court had previously issued such an order), *see, e.g., Bustos v. Raycraft*, No. 25-13202, 2025 WL 3022294, at *2 (E.D. Mich. Oct. 29, 2025); *Ferro v. Hyde*, No. CV25-513-SDN, 2025 WL 3003708, at *1 (D. Me. Oct. 27, 2025) (order issued same day petition was filed); *Lopez Pop v. Noem*, No. CV25-2589-SSS-SSC, 2025 WL 3050095, at *7 (C.D. Cal. Oct. 3, 2025); *Singh v. Delaney Hall*, No. CV25-16018-GC, 2025 WL 2772644, at *1 (D.N.J. Sept. 29, 2025); *Hom v. Ceja*, No. CV25-2221-WJM-TPO, 2025 WL 2801449, at *2 (D. Colo. Sept. 17, 2025).

Decision or Action You Are Challenging

5. What are you challenging in this petition: Immigration detention.

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: United States Immigration and Customs Enforcement.

(b) Docket number, case number, or opinion number: A# 

(c) Decision or action you are challenging: I was originally ordered removed from the United States on April 28, 2006. A few months later I was released from ICE detention on an Order of Supervision (OSUP). I was re-detained by ICE on August 5, 2025.

Your Earlier Challenges of the Decision or Action

7-9. First, second, and third appeals: None

10. Motion under 28 U.S.C. § 2255: N/A

11. Appeals of immigration proceedings: None

12. Other than the appeals listed above, have you filed any other petition, application, or motion about the issues raised in this petition? No.

Grounds for Your Challenge in This Petition

I. Introduction

Petitioner Thach Wana is presently detained at the Northwest ICE Processing Center (NWIPC). On information and belief, he has been held in immigration custody for more than six months.

Petitioner's removal to his former country of residence is not reasonably foreseeable. Petitioner's continued detention is therefore in violation of *Zadvydas v. Davis*, 533 U.S. 678, 689 (2001). Petitioner seeks (a) release; (b) an order preventing re-detention unless the government establishes by clear and convincing evidence at a hearing before a neutral decisionmaker that Petitioner is a flight risk or a danger to the

1 community, based on changed circumstances after their most recent release by ICE;
2 (c) an order preventing removal to a third country without notice and meaningful
3 opportunity to respond in compliance with the statute and due process in reopened
4 removal proceedings; and (d) an order barring removal to any third country pursuant to
5 Respondents' punitive removal policy.

6 Petitioner was originally detained by ICE for several months in 2006 before
7 being released on an Order of Supervision. Since his release, he has been continued on
8 supervision with an annual check-in requirement. On August 5, Petitioner was re-
9 detained without any determination by the government that he had become a flight risk
10 or a danger to the community.

11 **II. Jurisdiction and Venue**

12 This case arises under the Constitution of the United States, the Immigration and
13 Nationality Act ("INA"), 8 U.S.C. § 1101, *et seq.*, and the Administrative Procedures
14 Act ("APA"), 5 U.S.C. §§ 500–596, 701–706.

15 This Court has subject matter jurisdiction under 28 U.S.C. § 2241, *et seq.*
16 (habeas corpus), 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1346 (United States
17 as Respondent), and 28 U.S.C. § 1651 (All Writs Act). Respondents have waived
18 sovereign immunity for purposes of this suit. 5 U.S.C. §§ 702, 706.

19 The Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241, *et*
20 *seq.*; the Declaratory Judgment Act, 28 U.S.C. § 2201, *et seq.*; the All Writs Act, 28
21 U.S.C. § 1651; the Due Process Clause of the Fifth Amendment; and the Court's
22 inherent equitable powers.

23 Venue is proper in this district under 28 U.S.C. § 1391(e)(1) because
24 Respondents are agencies or officers of agencies of the United States; Respondents
25 Wamsley and Scott reside in this district; and Petitioner is detained in this district.
26

1 Venue is further proper under 28 U.S.C. § 1391(b)(2) because a substantial part of the
2 events or omissions giving rise to Petitioner's claims occurred in this district.

3 Because Petitioner is seeking relief related only to his custody status, which is
4 not inconsistent with an order of removal, exhaustion of administrative remedies, if any,
5 is not required.

6 **III. Requirements of 28 U.S.C. §§ 2241, 2243**

7 As addressed above, 28 U.S.C. § 2243 sets forth time constraints for an OSC.
8 Petitioner is "in custody" for the purpose of § 2241 because he has been detained by
9 Respondent ICE in Tacoma, Washington, since August 5, 2025.

10 **IV. Parties**

11 Petitioner Thach Wana is a citizen of Vietnam. He has a final order of removal
12 to Vietnam as the country designated for removal. Petitioner is detained in the control
13 and custody of Respondents at NWIPC. As such, Petitioner is a resident of Tacoma,
14 Washington.

15 Respondent Pamela Bondi is the Attorney General of the United States. In this
16 capacity, Respondent Bondi is the legal custodian of Petitioner. Respondent Bondi is
17 sued in her official capacity.

18 Respondent Kristi Noem is the Secretary of the Department of Homeland
19 Security ("DHS"). In this capacity, Respondent Noem is the legal custodian of
20 Petitioner. Respondent Noem is sued in her official capacity.

21 Respondent Cammilla Wamsley is the Field Office Director for ICE
22 Enforcement and Removal Operations ("ERO") in Seattle, Washington. As the ERO
23 Seattle Field Office Director, she is Petitioner's immediate custodian, responsible for
24 his detention at NWIPC, and is the person with the authority to authorize detention or
25 release. Respondent Wamsley is sued in her official capacity.

1 Respondent Bruce Scott is the Warden of the NWIPC, oversees the day-to-day
2 functioning of the NWIPC, and has immediate physical custody of Petitioner pursuant
3 to a contract with ICE to detain noncitizens. Respondent Scott is sued in his official
4 capacity as the Warden of a federal detention facility. *See Juarez v. Asher*, No. CV20-
5 700, 2021 WL 1946222, at *3–5 (W.D. Wash. May 14, 2021).

6 Respondent United States Immigration and Customs Enforcement (hereinafter
7 ICE) is the federal executive agency responsible for the enforcement of immigration
8 laws, including the arrest, detention, and removal of noncitizens. Respondent ICE is a
9 legal custodian of Petitioner.

10 **V. Background**

11 Petitioner Thach Wana's father was an American soldier and his mother is
12 Vietnamese. His brother and sister are American citizens, and he came to the U.S. in
13 1990 under the Amerasian Act. He speaks limited English and cannot read it, and the
14 ICE officers who detained him did not speak Vietnamese. At the time of his re-
15 detention, Petitioner was working as a supervisor for A&A Professional Cleaning
16 Services in Bellevue, where he has been employed for over five years.

17 **VI. Facts Pertaining to Petitioner's Continued Detention**

18 Petitioner's removal to Vietnam is not reasonably foreseeable. ICE has not
19 obtained a travel document from Vietnam for Petitioner, nor has Vietnam agreed to
20 accept Petitioner. Historically, Vietnam has accepted very few pre-1995 arrivals for
21 repatriation, and there is no evidence that the practice has changed.

22 Moreover, the process for the government of Vietnam to issue a travel
23 document, if it is issued at all, often takes many months to complete because it involves
24 both the Ministry of Foreign Affairs ("MOFA") and Ministry of Public Security
25 ("MPS"). Once the MOFA receives an official request for a travel document from ICE,
26 the information is forwarded to the MPS so that the local police can conduct interviews

1 and site-visits with the Petitioner's relatives in Vietnam. Only when this process is
 2 complete will the MPS give the green light to the MOFA to issue the travel document
 3 for repatriation.

4 **VII. The Legal Framework Regarding Indefinite Detention Pending Removal**

5 **A. Detention is unconstitutional when there is not a significant** 6 **likelihood of removal in the reasonably foreseeable future.**

7 Under 8 U.S.C. § 1231, detention of noncitizens who have been ordered
 8 removed is mandatory during the so-called 90-day "removal period." 8 U.S.C.
 9 § 1231(a)(1)(A). This period begins on the "date the order of removal becomes
 10 administratively final." 8 U.S.C. § 1231(a)(1)(B)(i). But the *Zadvydas* Court believed
 11 that a "serious constitutional threat" under the Fifth Amendment's Due Process Clause
 12 was posed by the indefinite detention of noncitizens. 533 U.S. at 699. The Court
 13 therefore interpreted 8 U.S.C. 1231(a)(6) to permit only detention related to the
 14 statute's "basic purpose [of] effectuating [a noncitizen]'s removal[.]" *Id.* at 696–99.

15 The Court further held that the presumptive period during which the detention is
 16 reasonably necessary to effectuate a noncitizen's removal is six months. After that, the
 17 noncitizen is eligible for conditional release if there is "no significant likelihood of
 18 removal in the reasonably foreseeable future." *Id.* at 701. After the "presumptively
 19 reasonable" period of six months, when the noncitizen can "provide[] good reason to
 20 believe that there is no significant likelihood of removal in the reasonably foreseeable
 21 future," then "the Government must respond with evidence sufficient to rebut that
 22 showing." *Id.*

23 The issue is not whether Respondents have been able to remove some
 24 individuals to a given country. Rather, the court must make an individualized analysis
 25 as to a particular detainee. *See Nguyen v. Scott*, -- F.Supp.3d --, 2025 WL 2419288, *17
 26 (W.D. Wash. Aug. 21, 2025) (stating increase in total number of removals to Vietnam,

1 including those who entered pre-1995, fails to rebut the evidence presented by
 2 Petitioner that “his individual circumstances make removal unlikely.”). Facts that are
 3 part of the analysis include whether Respondent provides evidence that the request was
 4 submitted to Vietnam, whether Vietnam has acknowledged receipt of the request or
 5 otherwise responded to Petitioner’s request, and the anticipated wait time for a response
 6 from Vietnam.

7 **B. The six-month presumptively reasonable period runs from the**
 8 **final removal order, regardless of whether Petitioner was**
 9 **detained during that period.**

10 When a petitioner has been detained for a total of six months after a final order
 11 of removal, the *Zadvydas* presumptively reasonable period has expired, even if the
 12 petitioner’s current period of detention is less than six months. “A petitioner’s total
 13 length of confinement need not be consecutive to reach the six-month presumptively
 14 reasonable limit established in *Zadvydas*.” *Tang v. Bondi*, No. CV25-1473-RAJ-TLF,
 2025 WL 2637750, at *4 (W.D. Wash. Sept. 11, 2025).

15 In fact, the six-month presumptively reasonable period runs unabated once
 16 Petitioner’s removal order was final and does not run solely during any period he was
 17 detained. In *Tran v. Bondi*, No. C25-01897-JLR, 2025 WL 3140462 (W.D. Wash.
 18 Nov. 10, 2025), the Honorable James L. Robart held that petitioner’s “*Zadvydas* grace
 19 period ended six months following the entry of the order of his removal[.]” *Id.* at *3.
 20 The court reached that conclusion even though the petitioner was not detained until two
 21 years later, and Respondents argued that only five months of the *Zadvydas* six-month
 22 period had expired, based on the times when petitioner was detained. *See* Federal
 23 Respondents’ Return Memorandum and Motion to Dismiss, *Tran v. Bondi*, No. C25-
 24 01897-JLR, dkt. 13 at 1, 7 (Oct. 27, 2025); *see also, e.g., Tadros v. Noem*, No. 25-4108-
 25 EP, 2025 WL 1678501, at *3 (D.N.J. June 13, 2025) (finding that “six-month detention
 26 period under *Zadvydas*” period began upon affirmance of removal order, rejecting

1 argument that petitioner could not obtain habeas relief because he had not yet been in
 2 detention for six months); *Farez-Espinoza v. Chertoff*, 600 F.Supp.2d 488, 500
 3 (S.D.N.Y. 2009) (concluding that presumptively reasonable six-month period expired
 4 six months after entry of removal order, even though petitioner was not in custody for
 5 any of that period); *Bailey v. Lynch*, No. CV16-2600 (JLL), 2016 WL 5791407, at *2
 6 (D.N.J. Oct. 3, 2016) (where order of removal became effective upon petitioner's
 7 release from underlying conviction to ICE authorities, after which he was held only
 8 "briefly" before being released on an order of supervision, the *Zadvydas* presumptively
 9 reasonable period ended "long before he was taken back into custody[.]").

10 A contrary view would run afoul of *Zadvydas*'s reasoning. *Zadvydas* established
 11 the six-month grace period to give ICE a fair chance to effectuate the removal before a
 12 court gets involved. 533 U.S. at 700–01. That was why the Court chose to expand the
 13 grace period beyond the 90-day statutory removal period: because Congress likely did
 14 not "believe[] that all reasonably foreseeable removals could be accomplished in that
 15 time." *Id.* at 701. Giving the government time to remove a noncitizen does not require
 16 that the individual be detained for all of that period. ICE can just as effectively take
 17 steps to arrange an individual's removal whether they are in a cell or on the street.

18 **VIII. The Law Pertaining to a Noncitizen's Procedural Due Process Right Not**
 19 **to Be Re-detained Absent a Hearing Establishing that the Individual Is**
 20 **Either a Flight Risk or a Danger to the Community**

21 Procedural due process requires notice and an opportunity to be heard. *Mathews*
 22 *v. Eldridge*, 424 U.S. 319, 333–34 (1976). To state a claim for a violation of procedural
 23 due process rights, a petitioner must establish (1) a protected property or liberty interest,
 24 and (2) a denial of adequate procedural protections. *ASSE Int'l, Inc. v. Kerry*, 803 F.3d
 25 1059, 1073 (9th Cir. 2015). The Court must also consider "the Government's interest,
 26 including the function involved and the fiscal and administrative burdens that the

1 additional or substitute procedural requirement would entail.” *Rodriguez Diaz v.*
2 *Garland*, 53 F.4th 1189, 1207 (9th Cir. 2022) (quoting *Mathews*, 424 U.S. at 335).

3 Petitioner’s interest in not being detained is “the most elemental of liberty
4 interests[.]” *E.A. T.-B. v. Wamsley*, No. CV25-1192-KKE, 2025 WL 2402130, at *3, *9
5 (quoting *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004)) (granting petition and ordering
6 immediate release with no re-detention absent “an immigration court hearing . . . held
7 (with adequate notice) to determine whether detention is appropriate.”); *see also, e.g.*,
8 *Ledesma Gonzalez v. Bostock*, No. CV25-1404-JNW-GJL, 2025 WL 2841574, *8
9 (W.D. Wash. Oct. 7, 2025) (finding detainee has liberty interest).

10 Where there is a liberty interest, determining what procedures are due generally
11 requires examining the factors set forth in *Mathews*:

12 First, the private interest that will be affected by the official action;
13 second, the risk of an erroneous deprivation of such interest through the
14 procedures used, and the probable value, if any, of additional or substitute
15 procedural safeguards; and finally, the Government’s interest, including
the function involved and the fiscal and administrative burdens that the
additional or substitute procedural requirement would entail.

16 *E.A. T.-B.*, 2025 WL 2402130, at *3 (quoting *Mathews*, 424 U.S. at 335).

17 Given that the liberty interest here is “the most elemental,” numerous courts
18 have found that this first factor weighs heavily in a petitioner’s favor. *See Ledesma*
19 *Gonzalez*, 2025 WL 2841574, at *7 (this factor “must be accorded significant weight”).
20 Petitioner’s status as a noncitizen does not negate that interest. “While the temporary
21 detention of noncitizens may sometimes be justified by concerns about public safety or
22 flight risk, the government’s discretion to incarcerate non-citizens is always constrained
23 by the requirements of due process[.]” *E.A. T.-B.*, 2025 WL 2402130, at *3 (quoting
24 *Hernandez v. Sessions*, 872 F.3d 976, 981 (9th Cir. 2017)).

25 The second factor, risk of an erroneous deprivation of liberty, also weighs in a
26 petitioner’s favor. A detainee’s release to the community on an OREC reflected ICE’s

determination that Petitioner was neither a flight risk nor a danger to the community. *See, e.g., Ledesma Gonzalez*, 2025 WL 2841574, at *8 (when ICE released petitioner, “it did so after determining—as required by regulation—that ‘such release would not pose a danger to property or persons, and that the [noncitizen] is likely to appear for any future proceeding.’ . . . By issuing the OREC, ICE necessarily found that [petitioner] was neither a flight risk nor a danger to the community.”) (quoting 8 C.F.R. § 236.1(c)(8)); *Barrenechea v. Albarran*, No. CV25-7883-VC, 2025 WL 2717279, at *1 (N.D. Cal. Sept. 22, 2025) (“ICE’s release of Barrenechea on his own recognizance in 2020 can only be understood as reflecting a determination that he did not pose a flight risk or danger to the community”).

The final factor, the government’s interest in detaining a petitioner without providing a pre-deprivation hearing, also weighs in a petitioner’s favor. “[T]he government’s interest in detaining petitioner without a hearing is low.” *Carballo*, 2025 WL 2381464, *8 (cleaned up). “In immigration court, custody hearings are routine and impose a minimal cost.” *Id.* (cleaned up).

As stated in *E.A. T.-B.*, 2025 WL 2402130, at *5, “although it would have required the expenditure of finite resources (money and time) to provide Petitioner notice and hearing on ATD violations before arresting and re-detaining him, those costs are far outweighed by the risk of erroneous deprivation of the liberty interest at issue.”

The holding that a released detainee was entitled to a pre-deprivation hearing comes not from *Ledesma Gonzalez* and *E.A. T.-B.* alone; dozens of other courts have reached this conclusion as well. *See, e.g., Pinchi v. Noem*, -- F.Supp.3d --, No. CV25-5632-PCP, 2025 WL 2084921, at *5 (N.D. Cal. July 24, 2025) (“Providing [petitioner] with the procedural safeguard of a pre-detention hearing will have significant value in helping ensure that any future detention has a lawful basis.”); *Doe v. Becerra*, 787 F.Supp.3d 1083, 1094 (E.D. Cal. 2025) (“[G]iven that Petitioner was previously found

1 to not be a danger or risk of flight and the unresolved questions about the timing and
 2 reliability of the new information, the risk of erroneous deprivation remains high.”);
 3 *Valdez v. Joyce*, 25 Civ. 4627 (GBD), 2025 WL 1707737, at *4 (S.D.N.Y. June 18,
 4 2025) (“Petitioner’s re-detention without any change in circumstances or procedure
 5 establishes a high risk of erroneous deprivation of his protected liberty interest.”).

6 In any hearing held by the government to try to justify re-detention, the
 7 government bears the burden to establish flight risk or danger by clear and convincing
 8 evidence. *See Sanchez-Rivera v. Matuszewski*, No. CV22-1357-MMA-JLB, 2023 WL
 9 139801, at *7 n.9 (S.D. Cal. Jan. 9, 2023) (noting that “an overwhelming majority of
 10 courts” have so held). For cases in this district, *see Odimara v. Bostock*, No. CV24-
 11 1412-MJP-TLF, 2025 WL 1490395, at *10 (W.D. Wash. Mar. 27, 2025), *report and*
 12 *recommendation adopted*, No. CV24-1412 MJP, 2025 WL 1489705 (W.D. Wash.
 13 May 23, 2025) (citing cases).

14 In addition, the government should be required to meet its burden based on
 15 changed circumstances subsequent to a petitioner’s previous release by ICE. *See Duong*
 16 *v. Kaiser*, No. CV25-7598-JST, 2025 WL 2689266, at *10 (N.D. Cal. Sept. 19, 2025)
 17 (holding that any re-detention first required a hearing “whether a material change of
 18 circumstances justifies [petitioner’s] re-detention”).

19 **IX. The Law Pertaining to a Noncitizen’s Regulatory Right Not to Be Re-**
 20 **detained Absent Notice, an Opportunity to Be Heard, and Findings that**
 21 **the Regulatory Standards for Re-detention Have Been Met.**

22 The revocation of a noncitizen’s release is governed by 8 C.F.R. § 241.13(i),
 23 which authorizes ICE to revoke a noncitizen’s release under § 1231 for purposes of
 24 removal or for violation of conditions of release. The government may revoke a
 25 noncitizen’s release and return them to ICE custody due to failure to comply with any
 26 of the conditions of release, 8 C.F.R. § 241.13(i)(1), or if, “on account of changed
 circumstances, the [Immigration] Service determines that there is a significant

likelihood that the [noncitizen] may be removed in the reasonably foreseeable future,”
id. § 241.13(i)(2).

Such revocation of release, even if justified by one of the reasons recognized by regulation, requires notice and an opportunity for the noncitizen to be heard. Upon a determination by the government (namely ICE) to re-detain a person previously released following a removal order:

the [noncitizen] will be notified of the reasons for revocation of his or her release. [ICE] will conduct an initial informal interview promptly after his or her return to [ICE] custody to afford the [noncitizen] an opportunity to respond to the reasons for revocation stated in the notification. The [noncitizen] may submit any evidence or information that he or she believes shows there is no significant likelihood he or she be removed in the reasonably foreseeable future, or that he or she has not violated the order of supervision. The revocation custody review will include an evaluation of any contested facts relevant to the revocation and a determination whether the facts as determined warrant revocation and further denial of release.

Id. § 241.13(i)(3).

ICE’s decision to re-detain also cannot be arbitrary, but instead is governed by the factors laid out in 8 C.F.R. § 241.13(f), including:

the history of the [noncitizen’s] efforts to comply with the order of removal, the history of [ICE’s] efforts to remove [noncitizens] to the country in question or to third countries, including the ongoing nature of [ICE’s] efforts to remove [the noncitizen] and the [noncitizen’s] assistance with those efforts, the reasonably foreseeable results of those efforts, and the views of the Department of State regarding the prospects for removal of [noncitizens] to the country or countries in question.

Id.; see also *Phan v. Beccerra*, No. 2:25-CV-01757-DC-JDP, 2025 WL 1993735, at *3 (E.D. Cal. July 16, 2025). While courts do not make these determinations in the first instance, they may review them for compliance with the regulation. See *id.*; *Nguyen v. Hyde*, No. CV25-11470-MJJ, 2025 WL 1725791, at *3 (D. Mass. June 20, 2025) (citing *Kong v. United States*, 62 F.4th 608, 620 (1st Cir. 2023)).

X. The Law Pertaining to a Noncitizen's Substantive Due Process Right Not to Be Re-detained Without Cause

“[S]ubstantive due process prevents the government from engaging in conduct that shocks the conscience, or interferes with rights implicit in the concept of ordered liberty.” *United States v. Salerno*, 481 U.S. 739, 746 (1987). “Freedom from bodily restraint has always been at the core of the liberty protected by the Due Process Clause from arbitrary governmental action.” *Foucha v. Louisiana*, 504 U.S. 71, 80, 112 S.Ct. 1780, 118 L.Ed.2d 437 (1992); *see also Zadvydas*, 533 U.S. at 696, 121 S.Ct. 2491 (finding that a noncitizen has a liberty interest “strong enough” to challenge “indefinite and potentially permanent” immigration detention). “Individuals who have been released from custody, even where such release is conditional, have a liberty interest in their continued liberty.” *Doe v. Becerra*, -- F.Supp.3d --, No. CV25-647-DJC-DMC, 2025 WL 691664, at *5 (E.D. Cal. Mar. 3, 2025) (citing *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972); *Young v. Harper*, 520 U.S. 143, 150 (1997); *Gagnon v. Scarpelli*, 411 U.S. 778, 782 (1973)).

“A due process violation occurs when detention becomes punitive rather than regulatory, meaning there is no regulatory purpose that can rationally be assigned to the detention or the detention appears excessive in relation to its regulatory purpose.” *United States v. Torres*, 995 F.3d 695, 708 (9th Cir. 2021); *accord Padilla v. U.S. Immigr. & Customs Enf't.*, 704 F.Supp.3d 1163, 1172 (W.D. Wash. 2023) (“Due process protects against immigration detention that is not reasonably related to the legitimate purpose of effectuating removal or protecting against danger and flight risk.”). The regulatory purpose of immigration detention is to hold a person that is a flight risk or a danger to the community. *In re Guerra*, 24 I.&N. Dec. 37 (B.I.A. 2006). Regulations governing parole identify only those two factors for consideration in the release decision. 8 C.F.R. § 236.1(c)(8). For people who have been ordered deported, 8 C.F.R. § 241.13(i)(2) also authorizes re-detention for purposes of removal, so long as

1 respondents can prove that “there is a significant likelihood that the [noncitizen] may be
2 removed in the reasonably foreseeable future.”

3 Thus, if a re-arrest and detention is punitive or exceeds the justifications
4 permitted by regulation, it violates the individual’s substantive right to due process.

5 **XI. The Legal Framework for Third-Country Removals**

6 The immigration laws delineate the proper procedures by which a country may
7 be designated for removal. *See* 8 U.S.C. § 1231(b). These procedures move in
8 incremental steps.

9 First, an individual with a removal order may designate the country to which
10 they want to be removed, and the government *shall* remove the individual to that
11 country. 8 U.S.C. § 1231(b)(2)(A). The government may disregard that designation if
12 (1) the individual fails to designate a country promptly; (2) the government of that
13 country does not inform the U.S. government finally, within 30 days after the date the
14 U.S. government first inquires, whether the government will accept the individual into
15 that country; (3) the government of the country is not willing to accept the individual
16 into the country; or (4) the government decides that removing the individual to that
17 country is prejudicial to the United States. 8 U.S.C. § 1231(b)(2)(C).

18 Second, if the individual is not removed to the country they designated under
19 § 1231(b)(2)(A), the government shall remove the individual to the country of which
20 the individual is a “subject, national, or citizen” unless the government of that country
21 does not inform the U.S. government or the individual within 30 days after first inquiry
22 or within another reasonable period of time whether the government will accept the
23 individual into the country or the country is not willing to accept the individual into the
24 country. 8 U.S.C. § 1231(b)(2)(D).

25 Third, if the individual is not removed to either the country of their designation
26 or the country of which they are a subject, national, or citizen, then the government

1 shall remove them to any of the following options: (1) the country from which the
2 individual was admitted to the United States; (2) the country in which is located the
3 foreign port from which the individual left for the United States or for a foreign
4 territory contiguous to the United States; (3) the country in which the individual resided
5 before the individual entered the United States and from which the individual entered
6 the United States; (4) the country in which the individual was born; or (5) the country in
7 which the individual's birthplace is located when the individual was ordered removed.

8 8 U.S.C. § 1231(b)(2)(E). *Only* “[i]f impracticable, inadvisable, or impossible” to
9 remove the individual to any of these countries may the government remove the
10 individual to “another country whose government will accept [them] into that country.”
11 8 U.S.C. § 1231(b)(2)(E)(vii).

12 Notwithstanding any of these procedures, the statute prohibits removal to a third
13 country where a person may be persecuted or tortured, a form of protection known as
14 withholding of removal. *See* 8 U.S.C. § 1231(b)(3)(A). The government “may not
15 remove [a noncitizen] to a country if the Attorney General decides that the
16 [noncitizen's] life or freedom would be threatened in that country because of the
17 [noncitizen's] race, religion, nationality, membership in a particular social group, or
18 political opinion.” *Id.*; *see also* 8 C.F.R. §§ 208.16, 1208.16. Withholding of removal is
19 a mandatory protection.

20 Similarly, Congress codified protections enshrined in the Convention Against
21 Torture (CAT) prohibiting the government from removing a person to a country where
22 they would be tortured. *See* Foreign Affairs Reform and Restructuring Act of 1998
23 (“FARRA”), Public Law 105–277, div. G, sec. 2242, 112 Stat. 2681, 2631–822 (8
24 U.S.C. § 1231 note) (“It shall be the policy of the United States not to expel, extradite,
25 or otherwise effect the involuntary return of any person to a country in which there are
26 substantial grounds for believing the person would be in danger of being subjected to

1 torture, regardless of whether the person is physically present in the United States.”);
2 28 C.F.R. §§ 200.1, 208.16–208.18, 1208.16–1208.18. CAT protection is also
3 mandatory.

4 To comport with the requirements of due process, the government must provide
5 notice of the third-country removal and an opportunity to respond. Due process requires
6 “written notice of the country being designated” and “the statutory basis for the
7 designation, i.e., the applicable subsection of § 1231(b)(2).” *Aden v. Nielsen*, 409
8 F.Supp.3d 998, 1019 (W.D. Wash. 2019); *see also D.V.D. v. U.S. Dep’t of Homeland*
9 *Sec.*, No. CV25-10676-BEM, 2025 WL 1453640, at *1 (D. Mass. May 21, 2025) (“All
10 removals to third countries, i.e., removal to a country other than the country or
11 countries designated during immigration proceedings as the country of removal on the
12 non-citizen’s order of removal, must be preceded by written notice to both the non-
13 citizen and the non-citizen’s counsel in a language the non-citizen can understand.”
14 (citation omitted)); *Andriasian v. INS*, 180 F.3d 1033, 1041 (9th Cir. 1999) (due process
15 requires notice to the noncitizen of the right to apply for asylum and withholding to the
16 country where they will be removed). The government must be able to show evidence
17 that the third country will accept the individual into that country. *See Himri v. Ashcroft*,
18 378 F.3d 932, 939 (9th Cir. 2004), *as amended* (Aug. 24, 2004), *amended sub nom. El*
19 *Himri v. Ashcroft*, No. 03-71152, 2004 WL 1879255 (9th Cir. Aug. 24, 2004) (“at the
20 time the government proposes a country of removal pursuant to § 1231(b)(2)(E)(vii),
21 the government must be able to show that the proposed country *will* accept the
22 [individual]”).

23 Due process also demands that the government “ask the noncitizen whether he or
24 she fears persecution or harm upon removal to the designated country and memorialize
25 in writing the noncitizen’s response. This requirement ensures DHS will obtain the
26 necessary information from the noncitizen to comply with § (b)(3) and avoids [a dispute

1 about what the officer and noncitizen said].” *Aden*, 409 F.Supp.3d at 1019; *cf. D.V.D.*,
2 2025 WL 1453640, at *1 (“Following notice, the individual must be given a meaningful
3 opportunity, and a minimum of ten days, to raise a fear-based claim for CAT protection
4 prior to removal.”) (emphasis omitted).

5 If the noncitizen claims fear, measures must be taken to ensure that the
6 noncitizen can seek asylum, withholding, and relief under CAT before an immigration
7 judge in reopened removal proceedings. *Cf. D.V.D.*, 2025 WL 1453640, at *1 (requiring
8 the government to move to reopen the noncitizen’s immigration proceedings if the
9 individual demonstrates “reasonable fear” and to provide “a meaningful opportunity,
10 and a minimum of fifteen days, for the non-citizen to seek reopening of their
11 immigration proceedings” if the noncitizen is found to not have demonstrated
12 “reasonable fear”); *Aden*, 409 F.Supp.3d at 1019 (requiring notice and time for a
13 respondent to file a motion to reopen and seek relief).

14 Finally, notice of the country to which the noncitizen will be removed must not
15 be “last minute” because that would deprive an individual of a meaningful opportunity
16 to apply for fear-based protection from removal. *Andriasian*, 180 F.3d at 1041. They
17 must have time to prepare and present relevant arguments and evidence and to seek
18 reopening of their removal case.

19 **XII. Facts Pertaining to Punitive Banishment to Third Countries**

20 Since January 2025, Respondents have developed and implemented a policy and
21 practice of removing individuals to third countries, without first following the
22 procedures in the INA for designation and removal to a third country and without
23 providing fair notice and an opportunity to contest the removal in immigration court.

24 Respondents reportedly have negotiated with at least 58 countries to accept
25 deportees from other nations. On June 25, 2025, the *New York Times* reported that
26 seven countries—Costa Rica, El Salvador, Guatemala, Kosovo, Mexico, Panama, and

1 Rwanda—had agreed to accept deportees who are not their own citizens.² Since then,
2 ICE has carried out highly publicized third-country deportations to South Sudan and
3 Eswatini. It also attempted—and completed—an “end-run” around the protections of
4 the Convention Against Torture by deporting a group of migrants to Ghana, which sent
5 them on to their countries of citizenship despite fears of persecution.

6 Punishment and deterrence appear to be the point of the Administration’s third-
7 country removal scheme. The Administration has reportedly negotiated with countries
8 to have deportees imprisoned in prisons, camps, or other facilities. The government
9 paid El Salvador about \$5 million to arbitrarily and indefinitely imprison more than 200
10 deported Venezuelans in a maximum-security prison notorious for gross human rights
11 abuses, known as CECOT. In February, Panama and Costa Rica took in hundreds of
12 deportees from countries in Africa and Central Asia and imprisoned them in hotels, a
13 jungle camp, and a detention center. On July 4, 2025, ICE deported eight men,
14 including one pre-1995 Vietnamese refugee, to South Sudan. The men have been
15 detained incommunicado ever since. On July 15, 2025, ICE deported five men to the
16 tiny African nation of Eswatini, including one man from Vietnam, where they are
17 reportedly being held in solitary confinement.

18 The Administration has hand-selected countries known for human rights abuses
19 and instability for these third-country deportation agreements to frighten people in the
20 United States into self-deporting or to accept removal to their home countries. Indeed,
21 conditions in South Sudan are so extreme that the U.S. State Department website warns
22 Americans not to travel there, and, if they do, to prepare their will, make funeral
23 arrangements, and appoint a hostage-taker negotiator first.

25 ² Edward Wong, et al., *Inside the Global Deal-Making Behind Trump’s Mass*
26 *Deportations*, N.Y. Times (June 25, 2025), <https://www.nytimes.com/2025/06/25/us/politics/trump-immigrants-deportations.html> [<https://perma.cc/64G9-XYGB>].

1 On July 9, 2025, ICE issued a new memo stating that, when seeking to remove
2 an individual to a country not designated on the removal order, ICE may deport that
3 person without any procedures for notice or an opportunity to be heard if the State
4 Department confirms it has received diplomatic assurances that individuals will not be
5 persecuted or tortured. If no diplomatic assurances are received, the ICE memo
6 instructs officers to serve on the individual a Notice of Removal that includes the
7 intended country of removal. It instructs officers not to ask whether the individual is
8 afraid of removal to that country. It states that officers should “generally wait at least 24
9 hours following service of the Notice of Removal before effectuating removal” but that
10 “[i]n exigent circumstances, [ICE] may execute a removal order six (6) or more hours
11 after service of the Notice of Removal as long as the [noncitizen] is provided
12 reasonable means and opportunity to speak with an attorney prior to removal.”

13 The memo further instructs that if the noncitizen “does not affirmatively state a
14 fear of persecution or torture if removed to the country of removal listed on the Notice
15 of Removal within 24 hours, [ICE] may proceed with removal to the country identified
16 on the notice.” If the noncitizen “does affirmatively state a fear if removed to the
17 country of removal,” then ICE will refer the case to U.S. Citizenship and Immigration
18 Services (“USCIS”) for a screening for eligibility for withholding of removal and
19 protection under the Convention Against Torture. “USCIS will generally screen within
20 24 hours.” If USCIS determines that the noncitizen does not meet the standard, the
21 individual will be removed. If USCIS determines that the noncitizen has met the
22 standard, then the policy directs ICE to either move to reopen removal proceedings “for
23 the sole purpose of determining eligibility for [withholding of removal protection] and
24 CAT” or designate another country for removal.

25 The eight men who were ultimately deported to South Sudan all claimed fear of
26 removal to South Sudan. None of those men were provided a fear screening by a

1 USCIS officer or otherwise, despite the fact that they were held by ICE for six weeks
2 on a U.S. military base in Djibouti before their final removal to South Sudan.

3 **XIII. The Law Governing Punitive Removal Practices**

4 It is bedrock law that the U.S. government may not impose or inflict an infamous
5 punishment for violations of civil immigration law. In 1896, the U.S. Supreme Court
6 ruled that while deportation itself was not a punishment, the government could not
7 attach punitive conditions to deportation—in that case, imprisonment at hard labor—
8 absent a criminal charge, trial in a court of law, and the protections of the Fifth, Sixth,
9 and Eighth Amendments. *Wong Wing v. United States*, 163 U.S. 228, 237 (1896).

10 Importantly, the Court drew a distinction between deportation, which the Court
11 reasoned is “not a ‘banishment,’ in the sense in which that word is often applied to the
12 expulsion of a citizen from his country by way of punishment,” and government actions
13 aimed at punishment, such as imprisonment at hard labor in addition to deportation. *Id.*
14 at 236. The Court explained that deportation “is but a method of enforcing the return to
15 his own country of [a noncitizen] who has not complied with the conditions upon the
16 performance of which the government of the nation, acting within its constitutional
17 authority and through the proper departments, has determined that his continuing to
18 reside here shall depend.” *Id.* (quoting *Fong Yue Ting v. United States*, 149 U.S. 730
19 (1893)). But the Court admonished that the government may not “declare unlawful
20 residence within the country to be an infamous crime, punishable by deprivation of
21 liberty and property . . . unless provision were made that the fact of guilt should first be
22 established by a judicial trial.” *Id.* at 237.

23 Deportation of individuals to third countries to be imprisoned or harmed is
24 unquestionably punishment.
25
26

Grounds for Relief

Ground One: Petitioner's Continued Detention in Immigration Custody Violates the Due Process Clause of the Fifth Amendment to the U.S. Constitution Because There Is No Significant Likelihood that Petitioner Will Be Removed in the Reasonably Foreseeable Future.

The allegations in the above paragraphs are realleged and incorporated herein.

Because Petitioner's removal order became final on April 28, 2006, the removal period has long since expired and detention is no longer required under 8 U.S.C. § 1231. In addition, the presumptively reasonable grace period of six months for removal has passed and there is "good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future[.]" *Zadvydas*, 533 U.S. at 701. Therefore, the burden shifts to the government to rebut that showing. The government cannot meet that burden under the facts of this case. *See Nguyen v. Scott*, No. CV25-1398, 2025 WL 2419288, at *28–29 (W.D. Wash. Aug. 21, 2025) (granting preliminary injunction requiring release under *Zadvydas*); *Tang*, 2025 WL 2637750, at *6 (same).

Ground Two: Procedural Due Process

The allegations in the above paragraphs are realleged and incorporated herein.

Petitioner has a liberty interest in not being re-detained. Applying the three-factor test of *Mathews*, that interest is high. The risk of any erroneous deprivation is also high, because ICE's previous release of Thach Wana necessarily reflected a conclusion that he was not a flight risk or a danger to the community. Here, as in *Ledesma Gonzalez*, "ICE revoked that release without any reassessment of those factors." 2025 WL 2841574, at *8.

Finally, the cost to the government of providing a hearing is low, and significantly outweighed by the other factors.

Ground Three: Failure to Comply with Regulations

The allegations in the above paragraphs are realleged and incorporated herein.

Respondents have not complied with their obligations under 8 C.F.R. § 241.13 and therefore Petitioner is entitled to release. On information and belief,

a) Respondents did not make a determination either that, on account of changed circumstances, there was a significant likelihood that Petitioner would be removed in the reasonably foreseeable future or that Petitioner violated the conditions of release;

b) to the extent that Respondents made such a determination, they lacked an adequate basis to do so and did not properly consider the factors specified in the regulations;

c) Respondents did not timely notify Petitioner in writing of the reasons for revocation in a manner that he could reasonably respond to;

d) Respondents did not conduct the required initial informal interview;

e) Respondents did not afford Petitioner an opportunity to respond; and

f) Respondents did not advise Petitioner of the right to request a review of the detention and did not comply with the requirements for such review.

Ground Four: Substantive Due Process

Respondents' policy against parole in all cases supports the conclusion that the government is not following the legal requirements for detention, as do many reported statements advocating for increased arrests for their own sake. Respondents' refusal to address widespread mistreatment of detained immigrants also supports that conclusion.

See Nicole Acevedo, Hundreds of alleged human rights abuses in immigrant detention, report finds, NBC News (Aug. 5, 2025), [https://www.nbcnews.com/news/us-](https://www.nbcnews.com/news/us-news/immigration-detention-human-rights-abuses-report-rcna222499)

report finds, NBC News (Aug. 5, 2025), [https://www.nbcnews.com/news/us-](https://www.nbcnews.com/news/us-news/immigration-detention-human-rights-abuses-report-rcna222499)

report finds, NBC News (Aug. 5, 2025), [https://www.nbcnews.com/news/us-](https://www.nbcnews.com/news/us-news/immigration-detention-human-rights-abuses-report-rcna222499)
[<https://perma.cc/3XLR-6XHX>]; Center for Human Rights, Conditions at the Northwest Detention Center, University of Washington,

1 [https://jsis.washington.edu/humanrights/projects/immigrant-rights-](https://jsis.washington.edu/humanrights/projects/immigrant-rights-observatory/conditions-at-the-northwest-detention-center/)
2 [observatory/conditions-at-the-northwest-detention-center/](https://jsis.washington.edu/humanrights/projects/immigrant-rights-observatory/conditions-at-the-northwest-detention-center/) [[https://perma.cc/QF24-](https://perma.cc/QF24-UR6C)
3 [UR6C](https://perma.cc/QF24-UR6C)] (last visited Aug. 28, 2025).

4 **Ground Five: Violation of the Fifth Amendment, 8 U.S.C. § 1231,**
5 **Convention Against Torture, Implementing Regulations, and the**
6 **Administrative Procedure Act**

7 The allegations in the above paragraphs are realleged and incorporated herein.

8 The Fifth Amendment, the INA, the CAT, and implementing regulations
9 mandate meaningful notice and opportunity to respond to any attempt to remove
10 Petitioner to a third country in reopened removal proceedings. They also require an
11 opportunity for Petitioner to make a fear-based claim against removal to a third country
12 in reopened removal proceedings. Respondents' policy for third-country removals
13 violates all of these laws because it directs ICE agents to remove individuals to third
14 countries without any notice or process *at all* where diplomatic assurances are received
15 and, where no diplomatic assurances are received, to provide flagrantly insufficient
16 notice (6–24 hours) and opportunity to respond, in violation of the statute, regulations,
17 and Fifth Amendment.

18 Prior to any third-country removal, Petitioner must be provided with
19 constitutionally and statutorily compliant notice and an opportunity to respond and
20 contest that removal if he has a fear of persecution or torture in that country in reopened
21 removal proceedings. *See Nguyen*, 2025 WL 2419288, at *29 (granting preliminary
22 injunction against “removing Petitioner to a country other than [home country] without
23 notice and a meaningful opportunity to be heard in reopened removal proceedings with
24 a hearing before an immigration judge”).

25 **Ground Six: Punitive Third-Country Banishment; Violation of Fifth and**
26 **Eighth Amendments**

The allegations in the above paragraphs are realleged and incorporated herein.

1 Under the Fifth Amendment to the U.S. Constitution, no person shall “be held to
2 answer for a capital, or otherwise infamous crime, unless on a presentment or
3 indictment of a Grand Jury;” “be subject for the same offence to be twice put in
4 jeopardy of life or limb;” or “be deprived of life, liberty, or property, without due
5 process of law.”

6 The Eighth Amendment provides that no “cruel and unusual punishments” may
7 be inflicted.

8 The U.S. Supreme Court long ago held that the government may not inflict upon
9 individuals an “infamous punishment” in addition to deportation as a penalty for an
10 immigration violation, absent criminal charges, a judicial trial, and attendant
11 constitutional protections. *Wong Wing*, 163 U.S. at 236–38.

12 Petitioner was convicted and completed any sentences for his criminal
13 convictions many years ago. Petitioner’s convictions arguably made him removable
14 from the United States, but the convictions do not authorize the government to inflict,
15 as a matter of executive policy and discretion, additional punishment on Petitioner.
16 Respondents’ third-country removal program is punitive in nature and execution.

17 The government has arranged for third countries to receive deportees and
18 imprison them on arrival, possibly indefinitely and often in abhorrent conditions. It has
19 selected countries notorious for human rights abuses and instability for third-country
20 removal arrangements. It has targeted individuals with criminal convictions for third-
21 country removals where they will be imprisoned and harmed and has publicly broadcast
22 those removals to demonize and dehumanize the individuals subjected to these practices
23 and strike fear in the immigrant community to send a message of retribution and
24 deterrence.

25 Respondents’ third-country removal program is more than a publicity stunt. The
26 hundreds of individuals who have already been subjected to it have been banished in

1 foreign prisons upon arrival without charge and often without communication with the
2 outside world, including their families and lawyers. Respondents may not subject
3 Petitioner to its third-country removal program designed to impose a severe punishment
4 on its subjects. Such conduct “shocks the conscience” under Fifth Amendment
5 substantive due process, is cruel and unusual punishment, and may not be imposed
6 without charge and a judicial trial.

7 Respondents may not seek to remove Petitioner to a third country under their
8 punitive banishment policy and practices. *See Nguyen*, 2025 WL 2419288, at *29
9 (granting preliminary injunction against “removing Petitioner to any country where he
10 is likely to face imprisonment upon arrival”).

11 **Prayer for Relief**

12 Petitioner respectfully requests that this Court:

- 13 (a) Assume jurisdiction over this action;
- 14 (b) Issue an Order directing Respondents to show cause why this Petition
15 should not be granted within five days;
- 16 (c) Order Respondents to immediately release Petitioner from custody;
- 17 (d) Order that Respondents may not re-detain Petitioner without first holding
18 a hearing before a neutral decisionmaker at which the government bears the burden of
19 establishing flight risk or danger to the community by clear and convincing evidence
20 based on changed circumstances since Petitioner was previously released;
- 21 (e) Order that Respondents may not remove or seek to remove Petitioner to a
22 third country without notice and meaningful opportunity to respond in compliance with
23 the statute and due process in reopened removal proceedings;
- 24 (f) Order that Respondents may not remove Petitioner to any third country
25 because Respondents’ third-country removal program seeks to impose unconstitutional
26 punishment on its subjects, including imprisonment and other forms of harm; and

1 (g) Order all other relief that the Court deems just and proper.

2 **Verification Pursuant to LCR 100(e)**

3 Counsel verifies that this petition is authorized by Petitioner. It does not
4 personally bear Petitioner's signature because of the significant difficulty for counsel in
5 meeting with Petitioner in person and because mailing the petition to Petitioner and
6 having it mailed back would cause delay that would only extend the period of
7 his unlawful detention. Counsel knows the facts asserted above or alleges them on
8 information and belief, based on information obtained from the government and/or
9 Petitioner.

10 DATED this 19th day of November 2025.

11 Respectfully submitted,

12 s/ *Colin Fieman*
13 Attorney for Thach Wana
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