

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Son Truong VO,

Petitioner,

v.

Bruce SCOTT, Warden, Northwest ICE
Processing Center; Camilla WAMSLEY,
Enforcement and Removal Operations, Seattle
Field Office Director, U.S. Immigration and
Customs Enforcement; Kristi NOEM,
Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
HOMELAND SECURITY; Todd LYONS,
Acting Director and Senior Official
Performing Duties of Director of ICE;
U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Respondents.

) Civil Case No.

)
)
)
)
) **DECLARATION OF JENNIFER**
) **PASQUARELLA**

I, Jennifer Pasquarella, hereby declare as follows:

1. I am the attorney for Petitioner Vo in this matter. I am over 18 years old and make this declaration on the basis of personal knowledge. I am competent to testify to the matters stated in this declaration, which are true and correct to the best of my knowledge, information, and belief.

2. Attached as **Exhibit A** is a true and correct copy of letters of support provided by members of his community.

3. Attached as **Exhibit B** is a true and correct copy of his Order of Supervision Paperwork.

4. Attached as **Exhibit C** is a true and correct copy of Petitioner with his immediate and extended family.

5. On January 10, 2026, I met with Mr. Vo at the Northwest ICE Processing Center in Tacoma. I showed Mr. Vo a copy of what the ICE Notice of Revocation of Release looks like from my prior cases and Mr. Vo confirmed he had never seen or been presented that notice.

6. Attached as **Exhibit D** is a true and correct copy of ICE's third country removal policy dated July 9, 2025.

7. Attached as **Exhibit E** is a true and correct copy of Sarah Stillman's article *Disappeared to a Foreign Prison: The Trump Administration is deporting people to countries they have no ties to, where many are being detained indefinitely or forcibly returned to the places they fled.*, The New Yorker, Nov. 24, 2025.

8. Attached as **Exhibit F** is a true and correct copy of the declaration of Tin Thanh Nguyen filed in support of the habeas petition of Mong Tram v. Scott, 25-cv-01886-TMC.

I declare under penalty of perjury that the foregoing is true and correct to the best of knowledge and understanding, executed on January 14, 2025, in Seattle, Washington.

/s/ Jennifer Pasquarella

JENNIFER PASQUARELLA

Attorney for Petitioner