

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS**

DANIEL KHUNGBIK,	)	
	)	
Petitioner,	)	
	)	
vs.	)	Case No. 26-3016-JWL
	)	
CRYSTAL CARTER, Warden, FCI-Leavenworth;	)	
AARON J. WENDLER, Deportation Officer;	)	
TODD LYONS, ICE Acting Director;	)	
PAM BONDI, Attorney General; and	)	
KRISTI NOEM, DHS Secretary,	)	
	)	
Respondents.	)	
	)	

---

**SUPPLEMENTAL RESPONSE TO § 2241 HABEAS PETITION AND ORDER TO  
SHOW CAUSE**

On February 17, 2026, Respondents filed their response to Petitioner’s Petition for Writ of Habeas Corpus and the Court’s Order to Show Cause. *See Doc. 5.* This supplemental response informs the Court of developments that have occurred since February 17, 2026.

In Respondents’ initial response, Respondents noted that Petitioner met virtually with personnel from the Embassy of Myanmar on January 13, 2026. *Doc. 5, p. 3.* Respondents stated that at the conclusion of the meeting, ERO was advised that the travel document request will be sent to the Myanmar embassy headquarters for fulfillment, which generally means that the travel document interview was successful and that issuance of the travel document is forthcoming. *Id.* Respondents further noted that while the fulfillment process typically takes approximately thirty days from the date of interview, Respondents had not yet received a travel document request as of February 17, 2026. *Id.*

On February 19, 2026, a Detention and Deportation Officer (“DDO”) at ERO’s Removal Management Division (“RMD”) in Washington, D.C. advised that he received a travel document for Petitioner on February 18, 2026. Declaration of Marissa Saenz, ¶ 4, attached as Exhibit 1. On

February 19, 2026, the travel document was sent to ERO Kansas City via UPS. *Id.* ¶ 5. The travel document was received by ERO Kansas City today, February 20, 2026. *Id.* Now that the travel document has been issued and received, ICE will proceed with arranging for Petitioner's removal from the United States in the coming weeks. *Id.* ¶ 6. These developments further support the denial of Petitioner's habeas request.

Respectfully submitted,

RYAN A. KRIEGSHAUSER  
United States Attorney  
District of Kansas

*/s/ Sarah Burch Macke*

Sarah Burch Macke, KS #25948  
Assistant United States Attorney  
United States Attorney's Office  
District of Kansas  
301 N. Main, Suite 1200  
Wichita, Kansas 67226  
PH: (316) 269-6481  
FX: (316) 269-6484  
Email: sarah.macke@usdoj.gov  
*Attorney for Respondent*

**CERTIFICATE OF SERVICE**

I certify that on February 20, 2026 the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system, which will provide notice to all registered parties. I further certify that I caused a copy of the foregoing and the notice of electronic filing to be placed in the United States mail, postage prepaid, addressed to the following non-CM/ECF participant:

Daniel Khungbik  


Leavenworth-FCI  
Inmate Mail/Parcels  
P.O. Box 1000  
Leavenworth, KS 66048

*/s/ Sarah Burch Macke* \_\_\_\_\_  
Sarah Burch Macke