

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA**

Minh Quan Tran DAO,

Petitioner

v.

Todd BLANCHE, in his official capacity as the Acting Attorney General of the United States; Markwayne MULLIN, in his official capacity as the Secretary of the U.S. Department of Homeland Security; Todd LYONS, his official capacity as the Acting Director of U.S. Immigration and Customs Enforcement; Ladeon FRANCIS, in his official capacity as Director for the Atlanta Field Office of U.S. Immigration and Customs Enforcement; Jason STREEVAL, in his official capacity as Warden of Stewart Detention Center; and the U.S. DEPARTMENT OF HOMELAND SECURITY

Respondents

Case No.

**PETITION FOR WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241
(Expedited Consideration Requested)**

INTRODUCTION

1. Immigration and Customs Enforcement (ICE) has detained Minh Quan Tran Dao at Stewart Detention Center for more than six months beginning October 14, 2025. In those six months, the Vietnamese Consulate has twice refused to issue him travel documents—on January 7, 2026, and again on April 16, 2026. *See* Ex. 1 (First Vietnamese Consulate Letter); Ex. 2 (Second Vietnamese Consulate Letter). Both refusals are in writing and in the record. As of Respondents' most recent sworn account, ICE had not yet submitted a travel document request to Vietnam.

2. Six months past a final order of removal, *Zadvydas* asks a detained noncitizen to give the court “good reason” to believe his removal is not significantly likely in the reasonably foreseeable future. *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). Mr. Dao offers more than “good reason”: Vietnam has twice, recently, denied his travel document requests. The burden shifts to Respondents. They cannot meet it. Mr. Dao’s continued detention violates 8 U.S.C. § 1231(a)(6) and the Fifth Amendment.
3. On October 14, 2025, Mr. Dao reported to the Atlanta ICE office. He had complied with his Order of Supervision for twenty-two years. ICE arrested him that day and has held him at Stewart ever since. Mr. Dao filed a habeas petition on January 22, 2026. The Magistrate Judge recommended dismissal without prejudice on a single ground: six months of detention had not yet elapsed. That threshold has now passed.
4. ICE’s conduct since the arrest shows that removal is not happening. As of February 12, 2026—after four months of detaining Mr. Dao—ICE had yet to obtain translations necessary to complete the travel document request. Ex. 3 ¶15 (Guerra Decl.). And as of April 20, 2026—more than six months after detaining Mr. Dao—the most Respondents could say for their progress was that Mr. Dao’s travel document request “remains pending.” Ex. 4 (Email Correspondence). ICE is not working to remove Mr. Dao. It is warehousing him.
5. Mr. Dao is fifty-three. He has survived two strokes and partial paralysis. He is still recovering from open-heart surgery and takes eleven prescription medications daily. Ex. 5 (Cardiologist Letter). Every day of this detention is unlawful. Every day puts Mr. Dao’s health at greater risk.

6. The Court should grant the writ and order Mr. Dao's immediate release. If the Court finds conditions of release appropriate, Mr. Dao will comply with them, as he complied for twenty-two years before his re-detention. An Emergency Motion for Temporary Restraining Order and Preliminary Injunction is filed contemporaneously.

JURISDICTION AND VENUE

7. This action arises under the Constitution of the United States and the Immigration and Nationality Act, 8 U.S.C. § 1101 *et seq.*
8. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), 28 U.S.C. §§ 2201–2 (declaratory judgment), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).
9. This Court may grant relief under 28 U.S.C. § 2241 *et seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.
10. Venue lies in the Middle District of Georgia under 28 U.S.C. § 1391. Mr. Dao is detained in this District. His immediate custodian is located in this District. The events giving rise to this action occurred here.

PARTIES

11. Petitioner Minh Quan Tran Dao is fifty-three years old, a longtime resident of Augusta, Georgia, and a refugee admitted to the United States under the Humanitarian Operation program on October 26, 1994. He has been detained at Stewart Detention Center in Lumpkin, Georgia, since October 14, 2025.
12. Respondent Todd Blanche is the Acting Attorney General of the United States and a legal custodian of Mr. Dao.

13. Respondent Markwayne Mullin is the Secretary of the U.S. Department of Homeland Security and a legal custodian of Mr. Dao.
14. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement and a legal custodian of Mr. Dao.
15. Respondent Ladeon Francis is the Director of the Atlanta Field Office of ICE and a legal custodian of Mr. Dao.
16. Respondent Jason Streeval is the Warden of Stewart Detention Center. He has immediate physical custody of Mr. Dao.
17. Respondent U.S. Department of Homeland Security is the federal agency responsible for Mr. Dao's detention.

STATEMENT OF FACTS

Mr. Dao's Arrival in the United States

18. Mr. Dao was born in Vietnam in 1973. His family's immigration to the United States was not a matter of choice but of survival. Under the Humanitarian Operation program—a component of the United Nations High Commissioner for Refugees' Orderly Departure Program established to resettle Vietnamese refugees after the war—Mr. Dao's father, along with other former reeducation camp detainees, was eligible for resettlement in the United States. The reeducation camps subjected detainees to forced labor, starvation, and severe psychological abuse. Mr. Dao's father endured years there.
19. On October 26, 1994, Mr. Dao, his parents, and his two siblings arrived in the United States as refugees. They settled in Atlanta, Georgia. Mr. Dao was twenty-one.
20. Mr. Dao's first years in this country were difficult. He had limited English and few connections and soon ran into trouble with the law. In 1995, he was present when his

- acquaintances were involved in a fight at a restaurant. During the fight, Mr. Dao was shot in the neck and hospitalized. Three years later, on November 19, 1998, he was indicted on two federal RICO counts. On July 11, 2000, he was sentenced to forty-six months in prison.
21. After completing his sentence, Mr. Dao was transferred to ICE custody on or about September 13, 2002. On October 22, 2002, an Immigration Judge ordered him removed to Vietnam. Mr. Dao did not appeal.
22. During his immigration detention, Mr. Dao cooperated fully. He completed all paperwork ICE required for repatriation. ICE was unable to remove him. After seven months in custody, Mr. Dao filed a pro se habeas petition on April 24, 2003. *See Dao v. Melville*, No. 1:03-cv-01147-JEC, 2003 WL 23825850 (N.D. Ga. July 8, 2003). A month later, on May 29, 2003, ICE released him on an Order of Supervision. See Ex. 9 (May 29, 2003 OSUP). In response to his pro se habeas petition, DHS Deportation Officer Todd J. Thurlow swore that “[d]ue to the lack of a repatriation agreement with Vietnam, DHS/BICE was unable to obtain a travel document for Mr. Dao.” See Ex. 6 ¶ 3 (Thurlow Decl.).

Mr. Dao’s Life in Georgia

23. From May 29, 2003, onward, Mr. Dao lived without incident under an Order of Supervision. He reported to ICE as directed and had no further encounters with the criminal legal system. Over twenty-two years, he never missed a check-in of which he was aware.
24. During those twenty-two years, Mr. Dao built a family and a life. He earned a nail technician license and eventually opened a salon with his wife. He became a devoted stepfather to his wife’s two daughters. He and his wife raised two sons of their own. Both are now in college.

25. On September 13, 2011, ICE issued Mr. Dao a new Order of Supervision. *See* Ex. 7 (2011 OSUP). That 2011 Order of Supervision superseded the May 29, 2003, OSUP.
26. Since Mr. Dao received a final order of removal, the United States and Vietnam have entered into two repatriation agreements: a 2008 Agreement governing Vietnamese immigrants who arrived in the U.S. on or after July 12, 1995 (“post-1995”), and a 2020 Memorandum of Understanding addressing those who arrived before that date (“pre-1995”). Under both, Vietnam retained discretion to accept or reject individual repatriation requests on a case-by-case basis. *See* Ex. 8 (Dan Decl.).
27. Mr. Dao’s health has declined sharply in recent years. He has Type II diabetes, hypertension, and high cholesterol. In 2018, he suffered his first stroke. In 2022, he suffered a second, which left him partially paralyzed and unable to walk for months. He now requires a cane or walker for mobility.
28. On June 5, 2025—four months before ICE took him into custody—Mr. Dao underwent open-heart surgery to treat severe multivessel coronary artery disease. He remains in active postoperative recovery and relies on a strict daily regimen of eleven prescription medications to manage his condition and prevent life-threatening complications. *See* Ex. 5.

October 14, 2025, ICE Detention

29. On October 9, 2025, Mr. Dao received a letter from ICE summoning him to the Atlanta ICE office on October 14, 2025, for a “Case Review / update / annual reporting.” *See* Ex. 10 (ICE Appointment Letter).
30. On October 14, 2025, Mr. Dao reported to the Atlanta ICE office as directed. He brought medical records documenting his recent open-heart surgery and ongoing treatment requirements. Without notice and with no explanation, ICE placed him under arrest. ICE

did not assert that he had violated the conditions of his release nor offer any verbal explanation for its revocation of his release. He was transported that same day to Stewart Detention Center, where he has remained in ICE custody for more than six months.

Mr. Dao's Current Detention

31. On November 12, 2025, nearly a month after his arrest, ICE gave Mr. Dao forms to complete to request a travel document. Mr. Dao completed the forms immediately.
32. But ICE did not retrieve the completed paperwork until December 16, 2025—more than a month later and more than two months into Mr. Dao's detention.
33. Soon after, ICE returned to Mr. Dao with additional questions highlighted on the same application. Mr. Dao completed the additional paperwork immediately. ICE never collected it. *See* Ex. 11 ¶ 6 (First Dao Declaration). The additional paperwork remains in Mr. Dao's possession at Stewart. *Id.*
34. Mr. Dao's family was worried about his worsening health in detention and sought to expedite his release to Vietnam.¹ They sought assistance from Mekong NYC, a community-based organization serving Southeast Asian refugees. With the organization's

¹ Conditions at Stewart, including medical neglect and inadequate food and water and a recent death by suicide, have been well documented. *See* Timothy Pratt, *ICE Prison's 911 Calls Overwhelm a Rural Georgia Emergency System*, The Intercept (Dec. 12, 2025), <https://theintercept.com/2025/12/12/stewart-911-calls-ice-ambulance-emergency/> (documenting increase in requests for medical help from Stewart following "increased detainee populations without changes to medical staffing and capacity"); El Refugio, *Medical Neglect and Abuse in Stewart Detention Center: Historic Failures and Trump-Era Overcrowding before ICE Funding Increase* (July 2025), https://static1.squarespace.com/static/5dedd42f60df274331bcd16b/t/689f686416e7065ca756cda7/1755277412984/SDC_Report_El+Refugio_07-21-2015.pdf (documenting instances of inadequate medical care at Stewart); Sen. Jon Ossoff, *Medical Neglect & Denial of Adequate Food or Water in US Immigration Detention* (Oct. 2025), https://www.ossoff.senate.gov/wp-content/uploads/2025/10/25.10.24_Sen.-Ossoff-Medical-Neglect-Denial-of-Adequate-Food-or-Water-in-U.S.-Immigration-Detention.pdf (documenting medical neglect and denial of adequate food or water in ICE detention including twenty-two reports substantiated in Georgia); Sen. Warnock, *Warnock Ossoff Press Trump Administration Over Deaths in ICE Custody*, (Sept. 23, 2025), <https://www.warnock.senate.gov/newsroom/press-releases/warnock-ossoff-press-trump-administration-over-deaths-in-ice-custody/> (documenting June 7, 2025, death by suicide at Stewart marking thirteenth death at Stewart since 2006).

guidance, Mr. Dao's sister submitted a passport application on Mr. Dao's behalf to the Vietnamese Consulate in New York City. *See* Ex. 12 (First Que Chau Thi Dao Decl.).

35. On January 7, 2026, the Vietnamese Consulate responded. The Consulate formally refused to issue Mr. Dao a Vietnamese passport or any other travel document, stating that he "does not meet the requirements" and that the Consulate "will not be able to issue a Vietnamese passport or any travel documents for Mr. Minh Quan Tran Dao." *See* Ex. 1.
36. On January 22, 2026, Mr. Dao filed a habeas petition. *See Dao v. Bondi*, No. 4:26-cv-00128-CDL-ALS.
37. In their response, Respondents represented to the Court that as of February 12, 2026, they had not yet submitted Mr. Dao's travel document request to the Vietnamese government and were still in the process of having it translated. *See* Ex. 3 ¶¶ 12–17.
38. As Mr. Dao approached six months in detention, his sister reached out again to the Vietnamese Consulate in New York City to inquire whether it could approve a passport for Mr. Dao. The Consulate directed her to complete a new passport application on Mr. Dao's behalf, which she did. On April 16, 2026, the Vietnamese Consulate emailed a second letter confirming it would not issue a Vietnamese passport or travel document for Mr. Dao. *See* Ex. 13 ¶¶ 5-6 (Second Que Chau Thi Dao Decl.); Ex. 2.
39. On April 16, 2026, the Magistrate Judge issued a Report and Recommendation in the first habeas proceeding, recommending dismissal without prejudice on a single ground: six months of post-removal-order detention had not yet elapsed. *Dao v. Bondi*, No. 4:26-cv-00128-CDL-ALS, ECF No. 16 (M.D. Ga. Apr. 16, 2026). That threshold has since passed.
40. As of the date of this filing, Mr. Dao has not received a travel document. Whenever Mr. Dao or others detained at Stewart inquire about the status of their cases, ICE's standard

response is: “We’re working on getting you a travel document.” *See* Ex. 14 (Second Dao Decl.) ¶¶ 2, 8.

41. On April 20, 2026, upon request for an update about the status of Mr. Dao’s travel document request, Respondents’ counsel stated only that it “remains pending.” Ex. 4.
42. Six months into detention, with uncollected paperwork sitting in Mr. Dao’s cell and two official travel document denials from the Vietnamese government in hand, ICE’s assurances that it is working on a travel document are “akin to promising a check in the mail.” *Sun v. Noem*, No. 3:25-cv-02433, 2025 WL 2800037, at *2 (S.D. Cal. Sept. 30, 2025).
43. Meanwhile, Mr. Dao’s health has worsened since his arrest. He began experiencing hip pain while in detention, and the pain has grown worse over the last six months. He now uses a walker and cannot walk far because of his hip and foot pain. *See* Ex. 14 ¶ 9. A walk from his cell to the cafeteria that took three minutes before detention now takes fifteen.
44. At Stewart, Mr. Dao sees a doctor once every three months. The Stewart doctor does not ask Mr. Dao about his heart or check on his surgery site; Mr. Dao understands that the Stewart doctor is not a cardiologist. Since his detention began more than six months ago, Mr. Dao has not been able to speak with his cardiologist or with any other outside physician about his post-operative recovery or any other health issue. *See* Ex. 14 ¶ 10.
45. Mr. Dao has missed critical post-operative appointments. He experiences chest pain. He receives inadequate nutrition. He has been repeatedly ill with colds and flu throughout his more than six months in detention.
46. Mr. Dao’s cardiologist, Dr. Rodolfo Machado, has warned that placement in a detention environment poses medical risks to Mr. Dao “including but not limited to: [i]ncreased risk

of cardiac complications, elevated stroke risk due to stress or disrupted care, [and] potential instability if medications or follow-up care are interrupted.” *See* Ex. 5.

LEGAL FRAMEWORK

47. When a removal order becomes final, the Government has ninety days to effectuate removal. 8 U.S.C. § 1231(a)(1)(A). Detention during this period is mandatory. *Id.* § 1231(a)(2). Beyond the ninety-day removal period, detention is permitted only in narrow circumstances and for a narrow purpose. *Id.* § 1231(a)(6).
48. In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that § 1231(a)(6) cannot be read to permit indefinite detention. The Court construed the statute to authorize detention only for a period “reasonably necessary to secure removal,” setting six months as a presumptively reasonable ceiling. *Id.* at 699–701.
49. Post-order detention must “bear a reasonable relation to the purpose for which the individual [was] committed.” *Id.* at 690 (cleaned up). That purpose is removal. Where removal is not reasonably foreseeable, continued detention is “no longer authorized by statute” and violates the Due Process Clause. *Id.* at 699–700. The Supreme Court reaffirmed *Zadvydas*’s framework in *Clark v. Martinez*, 543 U.S. 371, 386 (2005), confirming that after “the passage of [six months]” the Government must either produce evidence of reasonable foreseeability or release the detainee.
50. After six months, a detainee need only provide “good reason” to believe that his removal is not significantly likely in the reasonably foreseeable future. *Id.* at 701. The burden then shifts to the Government to rebut that showing with concrete, individualized evidence. *Id.* The Eleventh Circuit applies this framework. *See Akinwale v. Ashcroft*, 287 F.3d 1050, 1052 (11th Cir. 2002) (petitioner must show detention “in excess of six months” plus “good

reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future”); *Singh v. U.S. Att’y Gen.*, 945 F.3d 1310, 1313 (11th Cir. 2019) (where the petitioner makes the requisite showing and the Government fails to rebut it, release is required).

CLAIMS FOR RELIEF

COUNT ONE

Detention in Excess of Statutory Authority in Violation of 8 U.S.C. § 1231(a)(6)

51. Mr. Dao incorporates the preceding paragraphs.

52. Section 1231(a)(6) authorizes the continued detention of a noncitizen whose removal order has become final only for a period “reasonably necessary to secure removal.” *Zadvydas v. Davis*, 533 U.S. 678, 699 (2001). The statute “does not permit indefinite detention.” *Id.* Continued detention “no longer authorized by statute” must cease. *Id.* at 699–700.

53. Six months is the presumptive ceiling on statutorily authorized post-order detention. *Id.* at 701; *Clark v. Martinez*, 543 U.S. 371, 386 (2005); *Akinwale v. Ashcroft*, 287 F.3d 1050, 1052 (11th Cir. 2002). Past that ceiling, a detainee who provides “good reason” to believe his removal is not significantly likely in the reasonably foreseeable future—a standard that is “not an onerous” one, *Mogos v. Thompson*, No. 5:26-CV-0740-JKP, 2026 WL 475079, at *4 (W.D. Tex. Feb. 13, 2026)—shifts the burden to the Government, which must “respond with evidence sufficient to rebut that showing,” *Zadvydas*, 533 U.S. at 701. Failure to rebut requires release. *Singh*, 945 F.3d at 1313.

54. Mr. Dao has been detained post-final-order of removal for more than six months since his October 14, 2025, re-detention.

55. Mr. Dao has demonstrated more than just “good reason to believe” that his removal is not significantly likely in the foreseeable future. He has presented direct, written evidence from Vietnam that it will not accept him for repatriation—twice in the last six months and most recently on April 16, 2026. Those denials have stated that the Vietnamese Consulate will issue neither a passport nor travel documents for him. *See* Exs. 1, 2.
56. The burden has shifted to the Government to rebut Mr. Dao’s strong showing of the unlikelihood of his removal with individualized evidence. *Zadvydas*, 533 U.S. at 701. The Government has not and cannot meet its burden. Courts have repeatedly rejected pending travel document requests as sufficient evidence to demonstrate likelihood of removal in the reasonably foreseeable future. *See, e.g., Balouch v. Bondi*, No. 9:25-CV-216-MJT, 2025 WL 2871914, at *3 (E.D. Tex. Oct. 9, 2025). The Supreme Court explicitly rejected this argument in *Zadvydas* by overruling the Fifth Circuit’s interpretation of § 1231(a)(6) as permitting ICE’s ongoing “good faith efforts” to effectuate deportation to justify indefinite detention. *See* 533 U.S. at 702.
57. Courts have likewise rejected general removal statistics as a substitute for individualized evidence of a specific petitioner’s removal. *See Nguyen v. Hyde*, 788 F. Supp. 3d 144, 151–52 (D. Mass. 2025) (generalized statistics insufficient; individualized evidence required); *Nguyen v. Bondi*, No. EP-25-CV-323-KC, 2025 WL 3120516, at *7 (W.D. Tex. Nov. 7, 2025) (rejecting 400+ Vietnamese removals figure as sufficient evidence of likelihood of removal); *Pham v. Bondi*, No. CIV-25-1157-SLP, 2025 WL 3243870, at *2 (W.D. Okla. Nov. 20, 2025) (same); *see also Khader v. Holder*, 843 F. Supp. 2d 1202, 1209 (N.D. Ala. 2011) (same where ICE’s success deporting some noncitizens to Jordan was undercut by Jordan’s documented rejection of others). Aggregate statistics tell the Court nothing about

whether *this* petitioner will be removed. *See generally* Ex. 8 (describing Vietnam’s history of delaying or refusing to issue travel documents).

58. Mr. Dao’s detention exceeds the authority Congress granted ICE under 8 U.S.C. § 1231(a)(6), which authorizes detention to effectuate removal. Here, where Vietnam has twice refused Mr. Dao’s repatriation and the Government has produced no evidence of foreseeable removal, Mr. Dao’s detention violates § 1231(a)(6). He is therefore entitled to immediate release under his previous conditions of supervision. *See* 8 U.S.C. § 1231(a)(3) (providing for supervised release after the removal period).

COUNT TWO

Detention Bearing No Reasonable Relationship to Removal in Violation of the Fifth Amendment of the U.S. Constitution

59. Mr. Dao incorporates the preceding paragraphs.

60. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects.” *Zadvydas*, 533 U.S. at 690. That protection is not reserved to citizens. “[T]he Due Process Clause applies to all ‘persons’ within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.” *Id.* at 693.

61. Civil detention complies with due process only when it serves a legitimate non-punitive purpose, and only when it bears a reasonable relation to that purpose. *Id.* at 690; *see Jackson v. Indiana*, 406 U.S. 715, 738 (1972) (“[D]ue process requires that the nature and duration of commitment bear some reasonable relation to the purpose for which the individual is committed.”).

62. When removal is not reasonably foreseeable, detention no longer reasonably relates to the purpose that justifies it. It becomes “potentially permanent”—the precise condition the

Supreme Court held violates substantive due process. *Id.* at 690–91, 699. Detention without end is punishment, not process.

63. Mr. Dao’s detention bears no reasonable relationship to removal. Vietnam has refused twice, in writing, to accept him. See Exs. 1, 2. Respondents have produced no evidence that a travel document request has been submitted to Vietnam in the more than six months since his arrest.
64. Nor can the Government justify continued detention as preventing flight or danger to the community. As the Supreme Court recognized, “by definition the first justification [of detention]—preventing flight—is weak or nonexistent where removal seems a remote possibility at best.” *Zadvydas*, 533 U.S. at 690. Moreover, when ICE issued Mr. Dao an Order of Supervision on May 29, 2003, and again on September 13, 2011, it necessarily determined that he posed neither a danger to the community nor a flight risk. *See* 8 C.F.R. § 241.4(e)(6), (f) (requiring ICE to determine that release will not pose a danger to the community or a significant risk of flight). Mr. Dao then complied with every condition of supervision for twenty-two years.
65. Because Respondents can point to no legitimate purpose for depriving Mr. Dao of his liberty, Mr. Dao’s detention violates the Due Process Clause of the Fifth Amendment to the United States Constitution. To rectify Mr. Dao’s continuing constitutional injuries, Mr. Dao must be released immediately

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that the Court:

- A. Assume jurisdiction over this matter;

- B. Expedite consideration of this Petition in light of Mr. Dao's serious and deteriorating medical condition;
- C. Issue an Order to Show Cause requiring Respondents to show, within three days, why this Petition should not be granted;
- D. Order Respondents to immediately release Mr. Dao from custody under the conditions of his prior supervised release and without electronic monitoring;
- E. Declare that Mr. Dao's detention violates 8 U.S.C. § 1231(a)(6) and the Due Process Clause of the Fifth Amendment of the U.S. Constitution;
- F. Enjoin Respondents from re-detaining Mr. Dao without individualized evidence of changed circumstances making his removal significantly likely in the reasonably foreseeable future, and require that any future detention comply with all applicable statutory, regulatory, or constitutional requirements; and
- G. Grant any further relief this Court deems just and proper.

Respectfully submitted this 27th day of April 2026.

Minh Quan Tran Dao

By and through his Counsel,

/s/ Phi Nguyen

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**Pro hac vice* motion pending

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Minh Quan Tran Dao, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 are true and correct to the best of my knowledge.

Respectfully submitted this 27th day of April, 2026.

/s/ Phi Nguyen

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