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UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Ijeoma Miriam Chanthavong,

Petitioner,

v.

Todd M. Lyons, et al.,

Respondents.

Case No. 0:25-cv-04770-JMB-ECW

PETITIONER'S NOTICE OF SUPPLEMENTAL FACTS RELEVANT TO THE PENDING PETITION FOR WRIT OF HABEAS CORPUS

Petitioner, Ijeoma Miriam Chanthavong, proceeding pro se, respectfully submits the following supplemental facts and evidence for the Court's consideration in connection with her pending Petition for Writ of Habeas Corpus.

I. Purpose of this Filing

Since the filing of the Petition for Writ of Habeas Corpus, several significant developments have occurred that bear directly on the legality and appropriateness of Petitioner's continued detention. These developments include a substantial deterioration in Petitioner's medical condition, emergency hospitalization, the continued inability to obtain medically recommended treatment while in ICE custody, and the circumstances surrounding the attempted execution of Petitioner's removal on July 2, 2026.

Petitioner respectfully submits this Notice to supplement the record with material facts that were not available at the time the original Petition was filed. The information and supporting evidence accompanying this filing are relevant to the Court's consideration of Petitioner's continued detention and provide additional factual context concerning events that have occurred since the Petition was initiated.

II. Petitioner's Medical Condition Has Continued to Deteriorate

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As described in the Petition, Petitioner suffers from severe anemia, chronic abnormal uterine bleeding, and uterine fibroids. Rather than improving during detention, Petitioner's condition has progressively deteriorated.

For approximately six months, Petitioner has experienced prolonged and excessive menstrual bleeding resulting in significant blood loss, severe weakness, dizziness, fatigue, shortness of breath, and repeated fainting episodes. While in ICE custody, Petitioner experienced multiple episodes of collapse or loss of consciousness, including incidents occurring on or about May 28, June 1, June 7, and June 29, 2026.

The most serious episode occurred on or about June 29, 2026. On that date, Petitioner was found collapsed on the floor while detained. According to Petitioner, her oxygen saturation level had fallen to approximately 69% to 70%. Detention staff reportedly administered approximately seven liters of supplemental oxygen before emergency medical personnel arrived. Petitioner was then transported by ambulance to Mercy Hospital, where she remained hospitalized for several days for emergency evaluation and treatment.

During her hospitalization, medical providers informed Petitioner that she was suffering from severe anemia and that her ongoing blood loss and underlying gynecological condition continued to place her health at significant risk. Petitioner was further advised that the underlying condition requires additional evaluation and treatment, including surgical intervention. Petitioner understands that, unless the underlying condition is treated, she remains at risk of continued blood loss, worsening anemia, weakness, dizziness, collapse, and additional medical emergencies.

Following her discharge from the hospital, Petitioner's symptoms persisted. Petitioner reports that one menstrual cycle began on or about July 2, 2026, followed by another on or about July 13, 2026, leaving only approximately eleven days between cycles and resulting in additional significant blood loss.

Petitioner remains detained and has not received the surgical treatment that medical providers have advised is necessary to address the underlying condition.

III. Medical Emergency, Hospitalization, and the July 2, 2026, Removal Attempt

Shortly before the medical emergency that resulted in her hospitalization, Petitioner communicated with counsel regarding the anticipated filing of a Petition for Writ of Habeas Corpus challenging her continued detention. During that communication, counsel advised Petitioner that the habeas petition would be filed on her behalf that same day. A copy of the relevant email correspondence is attached as **Exhibit A**. Petitioner reasonably relied on those representations.

Shortly thereafter, Petitioner experienced the medical emergency described above and remained hospitalized for several days. During that period, Petitioner's attention was necessarily focused on receiving emergency medical treatment and recovering from a serious medical condition. As a result of her hospitalization and recovery, Petitioner had no meaningful ability to monitor court proceedings, review docket filings, independently verify the status of the anticipated habeas petition, or otherwise manage her legal affairs.

Upon her discharge from the hospital and return to ICE custody, Petitioner continued to rely on the last information she had received from counsel namely, that a habeas petition challenging her continued detention had been or would be filed on her behalf. Petitioner had no reason to believe that the filing had not occurred as represented by counsel and no practical means of independently confirming its status.

Only a short time after returning from the hospital, and while still recovering from severe anemia, ongoing blood loss, weakness, and the effects of a recent medical emergency, ICE officers initiated efforts to execute Petitioner's removal on July 2, 2026.

When ICE officers questioned Petitioner, she informed them that she understood a habeas corpus petition challenging her continued detention to be pending. Petitioner made that statement because it reflected her genuine understanding of the status of her

case based on the information previously provided by counsel. She was not attempting to evade removal, obstruct ICE operations, or frustrate the execution of a lawful order. Rather, she was acting consistently with the information reasonably available to her at that time.

Initially, ICE officers advised Petitioner that they had no confirmation that a habeas petition had been filed. ICE subsequently contacted Petitioner's counsel and requested documentation regarding the petition. Approximately one hour later, ICE confirmed that a habeas corpus petition had, in fact, been filed on Petitioner's behalf.

Accordingly, the existence of the habeas petition the very matter Petitioner sought to bring to ICE's attention was ultimately confirmed. The only discrepancy concerned the timing of the filing, a matter that was outside Petitioner's knowledge and beyond her ability to verify while detained and recovering from a serious medical emergency.

Between the commencement of the removal process and ICE's confirmation that the petition had been filed, Petitioner had no meaningful opportunity to communicate with counsel, review court filings, or otherwise verify the status of the case.

Under these circumstances, Petitioner respectfully submits that her conduct on July 2, 2026, reflected a good-faith reliance on the information provided by counsel and the circumstances as she reasonably understood them at the time. The factual record does not reflect an intentional effort to mislead ICE or obstruct the execution of a removal order, but rather Petitioner's reasonable reliance on counsel's representations while recovering from a significant medical emergency.

IV. ICE Extension of the Removal Period

Following the attempted removal on July 2, 2026, ICE issued a Notice of Failure to Comply pursuant to INA § 241(a)(1)(C), asserting that Petitioner failed to comply with her obligations and attempted to prevent her removal from the United States. As a result of that determination, ICE extended Petitioner's removal period and continued her detention.

Petitioner respectfully disputes that characterization.

As set forth above, Petitioner's actions on July 2 did not arise from an intent to obstruct or delay her removal. Rather, Petitioner informed ICE officers that she understood a habeas corpus petition challenging her continued detention to be pending because that was the information provided to her by counsel before her hospitalization. As reflected in **Exhibit A**, Petitioner reasonably relied on those representations and had no meaningful opportunity to verify the status of the filing while hospitalized, recovering from a serious medical emergency, or immediately upon her return to detention.

Moreover, ICE subsequently confirmed that a habeas corpus petition had, in fact, been filed on Petitioner's behalf. The issue was therefore not the existence of the petition, but Petitioner's understanding of the timing of its filing a matter that was outside Petitioner's knowledge and beyond her ability to independently confirm while detained.

Petitioner respectfully submits that these circumstances do not support the conclusion that she intentionally sought to frustrate or prevent her removal. Instead, they demonstrate that her statements and conduct were consistent with her good-faith understanding of the information available to her at the time.

The extension of Petitioner's removal period has had the practical effect of prolonging her detention despite her continuing medical deterioration and unresolved need for treatment. Accordingly, Petitioner respectfully submits that the circumstances surrounding the July 2 incident, including her recent hospitalization, her inability to independently verify the status of the anticipated habeas filing, and her reasonable reliance on counsel's representations, are relevant to the Court's evaluation of the legality and appropriateness of her continued detention.

V. Impact of Continued Detention

Petitioner remains detained despite an ongoing medical condition that requires continued evaluation and treatment. As described above, Petitioner continues to experience recurrent abnormal uterine bleeding, severe anemia, weakness, dizziness,

shortness of breath, and repeated fainting episodes. These symptoms have persisted despite emergency hospitalization and have materially affected Petitioner's daily functioning and overall health.

Medical providers have advised Petitioner that treatment of the underlying gynecological condition, including surgical intervention, is necessary to address the source of the recurrent blood loss and anemia. To date, Petitioner has not received the recommended treatment while in ICE custody.

Petitioner respectfully submits that continued detention under these circumstances places her at risk of further medical deterioration and additional medical emergencies. The ongoing delay in receiving definitive treatment is directly relevant to the Court's evaluation of whether Petitioner's continued detention remains appropriate.

VI. Humanitarian Considerations

In addition to her ongoing medical condition, Petitioner remains deeply concerned about the welfare of her minor son.

Petitioner's continued detention has created prolonged uncertainty regarding her son's care, stability, and living arrangements. The separation has imposed significant emotional hardship on both Petitioner and her child and has continued for an extended period while these proceedings remain pending.

Petitioner respectfully submits that these humanitarian considerations, when viewed together with her deteriorating medical condition and prolonged detention, provide additional context for the Court's consideration of the circumstances of this case.

VII. Request

For the foregoing reasons, Petitioner respectfully requests that the Court consider the supplemental facts and evidence presented in this Notice, together with the accompanying exhibits, including medical records, hospital records, ICE

correspondence, the Notice of Failure to Comply, and **Exhibit A** documenting counsel's communications regarding the anticipated filing of the habeas petition.

These developments occurred after the filing of the original Petition and bear directly on Petitioner's continued detention, her deteriorating medical condition, the extension of her removal period, and the circumstances surrounding the attempted removal on July 2, 2026. Petitioner respectfully submits that these supplemental facts provide important context for the Court's evaluation of the legality and continued appropriateness of her detention and should be considered together with the pending Petition for Writ of Habeas Corpus.

Respectfully submitted,

Ijeoma Miriam Chanthavong
Petitioner Pro Se
A[redacted]

Date: _____