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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

VELA Blanco, Noe,
A# 

Petitioner,

vs.

Warden, Northwest ICE Processing Center;
U.S. Immigration and Customs Enforcement
(ICE); Alejandro Mayorkas, Secretary of the
Department of Homeland Security,

Respondents.

CIVIL ACTION NO. 25-6097

PETITION FOR WRIT OF
HABEAS CORPUS
28 U.S.C. § 2241
AND EMERGENCY MOTION TO
PREVENT TRANSFER

I. INTRODUCTION

Petitioner Noe Vela Blanco petitions this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. Petitioner is currently detained at the Northwest ICE Processing Center in Tacoma, Washington, following a warrantless and violent arrest on November 22, 2025. Petitioner has lived in the United States for approximately twenty-three years, has three United States citizen children, no criminal history, and owns a construction company through which he supports his family and pays taxes.

PETITION FOR WRIT OF HABEAS CORPUS 28 U.S.C. § 2241 AND EMERGENCY MOTION TO PREVENT TRANSFER - 1

1 Petitioner has a Master Calendar Hearing scheduled for December 17, 2025. Petitioner's
2 family lives in Washington, and counsel has just been retained and filed a bond request today.
3 ICE has now indicated it intends to transfer Petitioner immediately. Such a transfer would
4 irreparably impair Petitioner's ability to be represented and to prepare for his upcoming hearing.
5 Emergency intervention by this Court is required.
6

7 II. JURISDICTION AND VENUE

8 This Court has jurisdiction pursuant to 28 U.S.C. § 2241, 28 U.S.C. § 1331, and the Due
9 Process Clause of the Fifth Amendment to the United States Constitution.
10

11 Venue is proper in the Western District of Washington, Tacoma Division, because
12 Petitioner is physically detained within this District and his immediate custodian, the Warden of
13 the Northwest ICE Processing Center, resides here.

14 III. PARTIES

15 Petitioner Noe Vela Blanco, A# [REDACTED] is detained at the Northwest ICE
16 Processing Center in Tacoma, Washington.
17

18 Respondents are the Warden of the Northwest ICE Processing Center, U.S. Immigration
19 and Customs Enforcement, and Alejandro Mayorkas, Secretary of the Department of Homeland
20 Security.

21 IV. FACTUAL BACKGROUND

22 Petitioner has continuously lived in the United States for approximately twenty-three
23 years. He is the father of three United States citizen children and has built his life in this country.
24 Petitioner has no criminal history. He owns and operates a construction company and has been a
25 long-standing taxpayer.
26

1 On November 22, 2025, Petitioner was at a Home Depot purchasing materials for work
2 when ICE officers began following him. Petitioner was driving a [REDACTED]
3 ICE attempted to force Petitioner to pull over in the middle of the street. When Petitioner exited
4 the vehicle, ICE officers broke the driver's side window without warning.
5

6 Petitioner is diabetic and medically vulnerable. A United States citizen witnessed and
7 recorded the arrest. When the citizen attempted to continue recording, ICE officers attempted to
8 run him over with a vehicle.

9 Petitioner was taken into ICE custody and transported to the Northwest ICE Processing
10 Center in Tacoma, Washington. He has remained detained since November 22, 2025.
11

12 Petitioner has a Master Calendar Hearing scheduled for December 17, 2025. Petitioner's
13 family resides in Washington. His legal counsel is located in Washington and has now been
14 formally retained. Counsel filed a bond request today. ICE has since indicated that it intends to
15 transfer Petitioner immediately, without notice or opportunity to be heard.
16

17 The proposed transfer would place Petitioner far from his attorney and family, disrupt
18 attorney-client communication, prevent meaningful preparation for his hearing, and severely
19 prejudice his ability to defend his case.

20 V. CLAIMS FOR RELIEF

21 Petitioner is unlawfully detained in violation of the Due Process Clause of the Fifth
22 Amendment. Continued detention without meaningful bond consideration, despite deep family
23 ties, decades of residence, and no criminal history, is unconstitutional.
24

25 The warrantless and violent manner of arrest, including destruction of property and
26 reckless endangerment of a United States citizen, further demonstrates the unlawfulness of
27 Petitioner's detention.

28 PETITION FOR WRIT OF HABEAS CORPUS 28 U.S.C. § 2241 AND EMERGENCY MOTION TO PREVENT
TRANSFER - 3

1 The imminent transfer of Petitioner would irreparably interfere with his right to counsel
2 and his ability to prepare for his December 17, 2025 hearing, violating due process.

3 Petitioner's diabetes places him at heightened risk while in custody and further weighs in
4 favor of immediate relief.
5

6 **VI. EMERGENCY NATURE OF RELIEF**

7 ICE has indicated an intent to transfer Petitioner immediately. Once transferred, effective
8 judicial relief would be substantially impaired. Emergency action by this Court is required to
9 preserve jurisdiction and prevent irreparable harm.
10

11 **VII. RELIEF REQUESTED**

12 Petitioner respectfully requests that this Court issue a Writ of Habeas Corpus ordering his
13 immediate release.

14 In the alternative, Petitioner requests an order directing an individualized bond hearing
15 before an Immigration Judge within seven days, with the government bearing the burden of
16 proof.
17

18 Petitioner further requests an order enjoining Respondents from transferring him outside
19 the Western District of Washington while his immigration proceedings are pending.

20 Petitioner requests any additional relief the Court deems just and proper.

21 **VIII. SIGNATURE AND CERTIFICATION**

22 The undersigned counsel certifies that she represents Petitioner Noe Vela Blanco and that
23 this Petition is filed on his behalf pursuant to 28 U.S.C. § 2241.
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1 Respectfully submitted this 5th day of December 2025.

2
3 /s/Vicky J Currie

4 Vicky J Currie, WSBA #24192
5 Attorney for Petitioners
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CERTIFICATE OF SERVICE

I, Vicky J Currie, certify that on this 5th day of December, 2025, I served true and correct copies of the **Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241**, together with all supporting exhibits, to be served upon the following Respondents by **United States mail** and/or **electronic service** as permitted:

Warden

Northwest ICE Processing Center
1623 East J Street
Tacoma, WA 98421

U.S. Immigration and Customs Enforcement (ICE)

Office of the Principal Legal Advisor (OPLA)
Seattle Field Office
500 12th Street, SW
Suite 200
Washington, DC 20536

Alejandro Mayorkas

Secretary, U.S. Department of Homeland Security
U.S. Department of Homeland Security
245 Murray Lane, SW
Washington, DC 20528

U.S. Attorney – Western District of Washington

700 Stewart Street
Suite 5220
Seattle, WA 98101

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 5th day of December 2025.

/s/Vicky J Currie

Vicky J Currie, WSBA #24192
Attorney for Petitioners