

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Caciano GARCIA MENDEZ, Pablo
GUZMAN SANTOYO, Pablo LARA
PAREDES, Oscar VILLATORO MONZON,
Manuel RUELAS GARIBAY, Jose Armando
AGUIRRE BERNABE, Juan ARENAS
MARTINEZ, Jesus BARAJAS CANO,
Artemio HERNANDEZ-TAPIA, Ana Gabriela
MARTINEZ TORRES, Gaspar MENDOZA
MENDOZA, Benito OROZCO-
RODRIGUEZ, Oscar RODRIGUEZ, Jose
Ulises ZAMBRANO VAZQUEZ, Cristino
ZURITA PAZ, Julian ORTIZ-VELAZQUEZ,
and Roberto GARCIA MUNIVE,

Petitioners,

v.

Laura HERMOSILLO, Seattle Acting Field
Office Director, Enforcement and Removal
Operations, U.S. Immigration and Customs
Enforcement (ICE); U.S. DEPARTMENT OF
HOMELAND SECURITY; EXECUTIVE
OFFICE FOR IMMIGRATION REVIEW;
Bruce SCOTT, Warden, Northwest ICE
Processing Center,

Respondents.

Case No. 2:25-cv-2560

**PETITION FOR WRIT OF
HABEAS CORPUS**

**INDIVIDUAL
ENFORCEMENT OF
RODRIGUEZ VAZQUEZ
BOND DENIAL CLASS
JUDGMENT**

FACTS

1. Petitioners Caciano Garcia Mendez, Pablo Guzman Santoyo, Pablo Lara Paredes, Oscar Villatoro Monzon, Manuel Ruelas Garibay, Jose Armando Aguirre Bernabe, Juan Arenas Martinez, Jesus Barajas Cano, Artemio Hernandez-Tapia, Ana Gabriela Martinez Torres, Gaspar Mendoza Mendoza, Benito Orozco-Rodriguez, Oscar Rodriguez, Jose Ulises Zambrano Vazquez, Cristino Zurita Paz, Julian Ortiz-Velazquez, and Roberto Garcia Munive bring this petition for a writ of habeas corpus to seek enforcement of their rights as members of the Bond Denial Class certified in *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. filed Mar. 20, 2025).¹

2. On September 30, 2025, this Court issued a final judgment “declar[ing] that Bond Denial Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under 8 U.S.C. § 1225(b)(2).” *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ----, 2025 WL 2782499, at *27 (W.D. Wash. Sept. 30, 2025).

3. The Court further declared “that the Tacoma Immigration Court’s practice of denying bond to Bond Denial Class members on the basis of § 1225(b)(2) violates the Immigration and Nationality Act.” *Id.*

Petitioner Caciano Garcia Mendez

1. Petitioner Caciano Garcia Mendez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at Northwest ICE Processing Center (NWIPC) after being apprehended by U.S. Immigration and Customs Enforcement (ICE) on or around November 14, 2025, *see* Ex. A;²

¹ The Bond Denial Class is comprised of “[a]ll noncitizens without lawful status detained at the Northwest ICE Processing Center [NWIPC] who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival, (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing.” *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ----, 2025 WL 2782499, at *6 (W.D. Wash. Sept. 30, 2025).

² All exhibit citations are to the authenticating declaration of Aaron Korthuis filed contemporaneously with this petition.

1 (b) entered the United States without inspection over twenty years ago and
was not apprehended upon arrival, *see id.*; Ex. B; and

2 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

3 2. After apprehending Mr. Garcia on or around November 14, the Department of
4 Homeland Security (DHS) placed him in removal proceedings pursuant to 8 U.S.C. § 1229a.
5 DHS has charged Petitioner as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone
6 who entered the United States without inspection. *See* Ex. B.

7 3. On December 11, an Immigration Judge (IJ) denied Mr. Garcia's bond request
8 based on lack of jurisdiction, finding that he is subject to mandatory detention under 8 U.S.C.
9 § 1225(b)(2)(A). The IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ
10 would have set bond at \$12,000. Ex. C.

11 **Petitioner Pablo Guzman Santoyo**

12 4. Petitioner Pablo Guzman Santoyo is a member of the Bond Denial Class, as he:

13 (a) does not have lawful status in the United States and is currently detained
14 at NWIPC after being apprehended by DHS on or around November 18,
2025, *see* Ex. D;

15 (b) last entered the United States without inspection more than twenty years
16 ago and was not apprehended upon arrival, *see id.*; Ex. E; and

17 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

18 5. After apprehending Mr. Guzman on or around November 18, DHS placed him in
19 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Guzman as being
20 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States
21 without inspection. *See* Ex. E.

22 6. On December 8, an IJ denied Mr. Guzman's bond request based on lack of
23 jurisdiction, finding that he is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A).
24 The IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ would have set
25 bond at \$15,000. Ex. F.

26 **Petitioner Pablo Lara Paredes**

27 7. Petitioner Pablo Lara Paredes is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 22, 2025, *see* Ex. G;
- (b) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *see id.*; Ex. H; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

8. After apprehending Mr. Lara on or around November 22, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Lara as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. H.

9. On December 9, an IJ denied Mr. Lara's bond request based on lack of jurisdiction, finding that he is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). The IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ would have set bond at \$8,000. Ex. I.

Petitioner Oscar Villatoro Monzon

10. Petitioner Oscar Villatoro Monzon is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on or around October 31, 2025, *see* Ex. J;
- (b) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *see id.*; Ex. K;
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

11. After apprehending Mr. Villatoro on or around October 31, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Villatoro as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. K.

12. On December 10, an IJ denied Mr. Villatoro's bond request based on lack of jurisdiction, finding that he is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). The IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ would have set bond at \$8,000. Ex. L.

Petitioner Manuel Ruelas Garibay

13. Petitioner Manuel Ruelas Garibay is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 8, 2025, *see* Ex. M;
- (b) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *see id.*; Ex. N; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

14. After apprehending Mr. Ruelas on or around November 8, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Ruelas as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. N.

15. On December 4, an IJ denied Mr. Ruelas' bond request based on lack of jurisdiction, finding that he is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). The IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ would have set bond at \$15,000. Ex. O.

Petitioner Jose Armando Aguirre Bernabe

16. Petitioner Jose Armando Aguirre Bernabe is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 12, 2025, *see* Aguirre Decl. ¶¶ 3, 4; Ex. P;
- (b) entered the United States without inspection more than twenty-five years ago and was not apprehended upon arrival, *id.* ¶¶ 2–3; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

17. After apprehending Mr. Aguirre on or around November 12, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Aguirre as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. P.

Petitioner Juan Arenas Martinez

18. Petitioner Juan Arenas Martinez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around December 7, 2025, *see* Arenas Decl. ¶¶ 3, 4;
- (b) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *id.* ¶ 2; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

19. After apprehending Mr. Arenas on or around December 7, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Aguirre as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Arenas Decl. ¶ 2.

Petitioner Jesus Barajas Cano

20. Petitioner Jesus Barajas Cano is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around December 9, 2025, *see* Barajas Decl. ¶¶ 3, 4;
- (b) entered the United States without inspection more than fifteen years ago and was not apprehended upon arrival, *id.* ¶¶ 2–3; *see* Ex. Q; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

21. After apprehending Mr. Barajas on or around December 9, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Barajas as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. Q.

Petitioner Artemio Hernandez-Tapia

22. Petitioner Artemio Hernandez-Tapia is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 28, 2025, *see* Hernandez Decl. ¶¶ 3, 4;
- (b) entered the United States without inspection more than fifteen years ago and was not apprehended upon arrival, *id.*; and

(c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

23. After apprehending Mr. Hernandez on or around November 28, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Hernandez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See id.* ¶ 2.

Petitioner Ana Gabriela Martinez Torres

24. Petitioner Ana Gabriela Martinez Torres is a member of the Bond Denial Class, as she:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 28, 2025, *see* Hernandez Decl. ¶¶ 3, 4;
- (b) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *id.* ¶ 2; *see* Ex. R; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

25. After apprehending Ms. Martinez on or around November 28, DHS placed her in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. Martinez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. R.

Petitioner Gaspar Mendoza Mendoza

26. Petitioner Gaspar Mendoza Mendoza is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 14, 2025, *see* Ex. S;
- (b) entered the United States without inspection more than twenty-five years ago and was not apprehended upon arrival, *see id.*; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

27. After apprehending Mr. Mendoza on or around November 14, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Mendoza as being

1 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) as someone who entered the United States
2 without inspection. *See* Ex. T.

3 **Petitioner Benito Orozco-Rodriguez**

4 28. Petitioner Benito Orozco-Rodriguez is a member of the Bond Denial Class, as he:

- 5 (a) does not have lawful status in the United States and is currently detained
6 at NWIPC after being apprehended by DHS on or around November 16,
2025, *see* Orozco Decl. ¶¶ 3, 4; Ex. U;
7 (b) entered the United States without inspection more than twenty-five years
8 ago and was not apprehended upon arrival, Orozco Decl. ¶ 2; *see* Ex. V;
9 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

10 29. After apprehending Mr. Orozco on or around November 16, DHS placed him in
11 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Orozco as being
12 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States
13 without inspection. *See* Ex. V.

14 **Petitioner Oscar Rodriguez**

15 30. Petitioner Oscar Rodriguez is a member of the Bond Denial Class, as he:

- 16 (a) does not have lawful status in the United States and is currently detained
17 at NWIPC after being apprehended by DHS on or around November 22,
2025, *see* Rodriguez Decl. ¶¶ 3, 4; Ex. W;
18 (b) entered the United States without inspection more than twenty-five years
19 ago and was not apprehended upon arrival, Rodriguez Decl. ¶ 2; *see* Ex.
X; and
20 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

21 31. After apprehending Mr. Rodriguez on or around November 22, DHS placed him
22 in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Rodriguez as being
23 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States
24 without inspection. *See* Ex. X.
25
26
27

Jose Ulises Zambrano Vazquez

32. Petitioner Jose Ulises Zambrano Vazquez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 12, 2025, *see* Zambrano Decl. ¶¶ 3, 4;
- (b) entered the United States without inspection more than thirty years ago and was not apprehended upon arrival, *id.*; *see* Ex. Y; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

33. After apprehending Mr. Zambrano on or around November 12, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Zambrano as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Zambrano Decl. ¶ 2.

Petitioner Cristino Zurita Paz

34. Petitioner Cristino Zurita Paz is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 25, 2025, *see* Zurita Decl. ¶¶ 3, 4;
- (b) entered the United States without inspection more than thirty-five years ago and was not apprehended upon arrival, *see id.* ¶ 2; Ex. Z; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

35. After apprehending Mr. Zurita on or around November 25, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Zurita as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. Z.

Petitioner Julian Ortiz-Velazquez

36. Petitioner Julian Ortiz-Velazquez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 4, 2025, *see* Ex. AA;

1 (b) entered the United States without inspection more than two years ago and
was not apprehended upon arrival, *see id.*; Ex. BB; and

2 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

3 37. After apprehending Mr. Ortiz on or around November 4, DHS placed him in
4 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Ortiz as being
5 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States
6 without inspection. *See* Ex. BB.

7 38. On November 25, an IJ denied Mr. Ortiz's bond request based on lack of
8 jurisdiction, finding that he is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A).
9 The IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ would have set
10 bond at \$15,000. Ex. CC.

11 **Roberto Garcia Munive**

12 39. Petitioner Roberto Garcia Munive is a member of the Bond Denial Class, as he:

13 (a) does not have lawful status in the United States and is currently detained
14 at NWIPC after being apprehended by DHS on or around November 4,
2025, *see* Ex. DD;

15 (b) entered the United States without inspection more than twenty years ago
16 and was not apprehended upon arrival, *see id.*; and

17 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

18 40. After apprehending Mr. Garcia Munive on or around November 4, DHS placed
19 him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Garcia Munive
20 as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United
21 States without inspection. *See* Ex. EE.

22 41. The Court should expeditiously grant this petition.

23 42. For all Petitioners, Respondents are bound by the judgment in *Rodriguez Vazquez*,
24 as it has the full "force and effect of a final judgment." 28 U.S.C. § 2201(a). Nevertheless,
25 Respondents continue to flagrantly defy the judgment in that case and continue to subject
26 Petitioners to unlawful detention despite their clear entitlement to consideration for release on
27 bond as Bond Denial Class members.

1 43. The Court should accordingly order that within one day, Respondent DHS must
2 release any petitioner who has received an alternative bond order by an IJ, or allow for those
3 petitioners' release upon payment of the alternative bond amount set by the IJ.

4 44. For the remaining Petitioners, the Court should order their release unless
5 Respondents provide a bond hearing under 8 U.S.C. § 1226(a) within seven days.

6 JURISDICTION & VENUE

7 45. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C.
8 § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the
9 Suspension Clause). The Court may grant relief pursuant to 28 U.S.C. § 2241; the Declaratory
10 Judgment Act, 28 U.S.C. § 2201 *et seq.*; and the All Writs Act, 28 U.S.C. § 1651.

11 46. Venue is proper in this District because Petitioners are detained at the NWIPC in
12 Tacoma, Washington. Venue is also proper under 28 U.S.C. § 1391(e) because Respondents are
13 employees, officers, and agencies of the United States, and a substantial part of the events or
14 omissions giving rise to the claims occurred in this District.

15 PARTIES

16 47. Petitioner Caciano Garcia Mendez was apprehended by immigration officers on
17 November 14, 2025, and is currently detained at NWIPC. He has received an alternative bond
18 order setting bond at \$12,000. He is a member of the Bond Denial Class certified in *Rodriguez*
19 *Vazquez*.

20 48. Petitioner Pablo Guzman Santoyo was apprehended by immigration officers on or
21 around November 18, 2025, and is currently detained at NWIPC. He has received an alternative
22 bond order setting bond at \$15,000. He is a member of the Bond Denial Class certified in
23 *Rodriguez Vazquez*.

24 49. Petitioner Pablo Lara Paredes was apprehended by immigration officers on or
25 around November 22, 2025, and is currently detained at NWIPC. He has received an alternative
26 bond order setting bond at \$8,000. He is a member of the Bond Denial Class certified in
27 *Rodriguez Vazquez*.

1 50. Petitioner Oscar Villatoro Monzon was apprehended by immigration officers on
2 October 31, 2025, and is currently detained at NWIPC. He has received an alternative bond order
3 setting bond at \$8,000. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

4 51. Petitioner Manuel Ruelas Garibay was apprehended by immigration officers on
5 November 8, 2025, and is currently detained at NWIPC. He has received an alternative bond
6 order setting bond at \$15,000. He is a member of the Bond Denial Class certified in *Rodriguez*
7 *Vazquez*.

8 52. Petitioner Jose Armando Aguirre Bernabe was apprehended by immigration
9 officers on November 12, 2025, and is currently detained at NWIPC. He is a member of the
10 Bond Denial Class certified in *Rodriguez Vazquez*.

11 53. Petitioner Juan Arenas Martinez was apprehended by immigration officers on
12 December 7, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
13 Class certified in *Rodriguez Vazquez*.

14 54. Petitioner Jesus Barajas Cano was apprehended by immigration officers on
15 December 9, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
16 Class certified in *Rodriguez Vazquez*.

17 55. Petitioner Artemio Hernandez-Tapia was apprehended by immigration officers on
18 November 28, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
19 Class certified in *Rodriguez Vazquez*.

20 56. Petitioner Ana Gabriela Martinez Torres was apprehended by immigration
21 officers on November 28, 2025, and is currently detained at NWIPC. He is a member of the
22 Bond Denial Class certified in *Rodriguez Vazquez*.

23 57. Petitioner Gaspar Mendoza Mendoza was apprehended by immigration officers
24 on November 14, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
25 Class certified in *Rodriguez Vazquez*.

1 58. Petitioner Benito Orozco-Rodriguez was apprehended by immigration officers on
2 November 16, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
3 Class certified in *Rodriguez Vazquez*.

4 59. Petitioner Oscar Rodriguez was apprehended by immigration officers on
5 November 22, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
6 Class certified in *Rodriguez Vazquez*.

7 60. Petitioner Jose Ulises Zambrano Vazquez was apprehended by immigration
8 officers on November 12, 2025, and is currently detained at NWIPC. He is a member of the
9 Bond Denial Class certified in *Rodriguez Vazquez*.

10 61. Petitioner Cristino Zurita Paz was apprehended by immigration officers on
11 November 25, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
12 Class certified in *Rodriguez Vazquez*.

13 62. Petitioner Julian Ortiz-Velazquez was apprehended by immigration officers on
14 November 4, 2025, and is currently detained at NWIPC. He has received an alternative bond
15 order setting bond at \$15,000. He is a member of the Bond Denial Class certified in *Rodriguez*
16 *Vazquez*.

17 63. Petitioner Roberto Garcia Munive was apprehended by immigration officers on
18 November 4, 2025, and is currently detained at the NWIPC. He is a member of the Bond Denial
19 Class certified in *Rodriguez Vazquez*.

20 64. Respondent Laura Hermosillo is the Seattle Acting Field Office Director of ICE's
21 Enforcement and Removal Operation division. As Petitioners' immediate custodian, she is
22 responsible for Petitioners' detention and removal. She is named in her official capacity.

23 65. Respondent U.S. Department of Homeland Security (DHS) is the federal agency
24 responsible for implementing and enforcing the Immigration and Nationality Act (INA),
25 including the detention and removal of noncitizens.

66. Respondent Executive Office for Immigration Review (EOIR) is the federal agency responsible for implementing and enforcing the INA in removal proceedings, including for custody redeterminations in bond hearings.

67. Respondent Bruce Scott is employed by The Geo Group, Inc., as Warden of the NWIPC, where Petitioners are detained. He has immediate physical custody of Petitioners. He is sued in his official capacity.

CLAIMS FOR RELIEF

Violation of the INA:

Request for Relief Pursuant to *Rodriguez Vazquez*

68. Petitioners repeat, re-allege, and incorporate by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

69. As members of the Bond Denial Class, Petitioners are entitled to consideration for release on bond under 8 U.S.C. § 1226(a).

70. The judgment in *Rodriguez Vazquez* makes clear that Respondents violate the INA in applying the mandatory detention statute at § 1225(b)(2) to class members.

71. Respondents are parties to *Rodriguez Vazquez* and bound by the Court's declaratory judgment, which has the full "force and effect of a final judgment." 28 U.S.C. § 2201(a).

72. By denying Petitioners a bond hearing under § 1226(a) and asserting that they are subject to mandatory detention under § 1225(b)(2), Respondents violate Petitioners' rights under the INA and this Court's judgment in *Rodriguez Vazquez*.

PRAYER FOR RELIEF

WHEREFORE, Petitioners pray that this Court grant the following relief:

- a. Assume jurisdiction over this matter;
- b. Issue a writ of habeas corpus requiring that within one day, Respondents release any petitioner with an alternative bond order unless Respondents allows for their

1 release upon payment of the alternative bond amount and any other conditions set
2 by the IJ;

3 c. Issue a writ of habeas corpus as to any petitioners without an alternative bond
4 order requiring Respondents to provide a bond hearing under 8 U.S.C. § 1226(a)
5 within seven days;

6 d. Order that upon Petitioners' release, Respondents must return to Petitioners any
7 personal property, including personal identification documents (other than a
8 passport) and employment authorization documents;

9 e. Award Petitioners attorney's fees and costs under the Equal Access to Justice Act
10 (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under
11 law; and

12 f. Grant any other and further relief that this Court deems just and proper.

13 DATED this 12th of December, 2025.

14 s/ Matt Adams
15 Matt Adams, WSBA No. 28287
16 matt@nwirp.org

s/ Leila Kang
Leila Kang, WSBA No. 48048
leila@nwirp.org

17 s/ Glenda M. Aldana Madrid
18 Glenda M. Aldana Madrid, WSBA No. 46987
19 glenda@nwirp.org

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