

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT
for the



JAN 15 2026

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

Juan Bravo-Zambrano
Petitioner

Case No. 2:26-cv-00167 JLR
(Supplied by Clerk of Court)

Pamela Bondi, U.S. Attorney General / Kristi
Noem, Secretary of DHS; Camilla Wamsley,
Seattle Office Director; Bruce Scott, Warden
of No. W. D.C.
Respondent
(name of warden or authorized person having custody of petitioner)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: Juan Bravo-Zambrano
- (b) Other names you have used: N/A
2. Place of confinement:
 - (a) Name of institution: Northwest ICE Processing Center
 - (b) Address: 1623 4th St, Suite 5, Tacoma, WA 98721
- (c) Your identification number: A# [REDACTED]
3. Are you currently being held on orders by:
☒ Federal authorities ☐ State authorities ☒ Other - explain:
DHS / ICE
4. Are you currently:
☐ A pretrial detainee (waiting for trial on criminal charges)
☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
 - (a) Name and location of court that sentenced you:
 - (b) Docket number of criminal case:
 - (c) Date of sentencing:☒ Being held on an immigration charge
☐ Other (explain):

Decision or Action You Are Challenging

5. What are you challenging in this petition:
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

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- ☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
☐ Disciplinary proceedings
☒ Other (explain): *unlawful revocation of Immigration Probation; permanent prejudice of his ~~Federal~~ Federal right to due process*

6. Provide more information about the decision or action you are challenging:

- (a) Name and location of the agency or court: *DHS/ICE in Tacoma, WA*
 (b) Docket number, case number, or opinion number:
 (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

(d) Date of the decision or action: *September 2025*

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☐ Yes ☐ No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court:
 (2) Date of filing:
 (3) Docket number, case number, or opinion number:
 (4) Result:
 (5) Date of result:
 (6) Issues raised:

(b) If you answered "No," explain why you did not appeal:

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☐ No

13.

• Ground One: Respondents transgressed ICE-OSUP regulations, APA, Accordi doctrine and/or petitioner's right to procedural/substantive Due Process under the Federal 5 Amendment when they failed to provide apt notice And/or a timely Informal Interview.

(a) Supportive Facts / Authorities

• In March 2023, petitioner was released from ICE custody; from March 2023 to September 2025, he believed that he has been in compliance with the conditions of OSUP-protection. On September 2025, he was arrested by ICE; he was apprised he was being detained for a violation, but was never shown any documents elaborating as to why. As of Today (Jan. 4, 2026), he has not been given the required prompt Informal Interview after arrest.

• Sorraduongsu v. Moem, 2025 US Dist Lexis 221590, * 6-7 (S. D. Cal. Nov. 2025); Saengphet v. Moem, 2025 US Dist Lexis 228778, at * 19 (S. D. Cal. Nov 2025).

• Ground two: Respondents transgressed petitioner's right to procedural/substantive due process under the 5th Amendment when they failed to provide a pre-deprivation court hearing by an impartial decision-maker before OSUP revocation.

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(a) Supportive Facts / Authorities

- Petitioner incorporated by reference section (a) of ground one hereinbefore and further avers that respondent has not provided him with a pre-deprivation / custody hearing before an impartial decision-maker prior revocation of O SUP probation.

- *Montezano v. Noem*, 2025 US Dist 266022 (C.D. Cal. 2025); *Khim v. Bondi*, 2025 US Dist Lexis 261018; ★ 10-11 C.W.D. Wash. Dec. 2025).

Ground Three: Respondent transgressed his right to procedural / substantive due process of law under the Federal 5th Amendment when the entirety of his final asylum court hearing was not recorded, causing permanent or temporary damage to his asylum claim.

(a) Supportive Facts

- On July 29, 2025, petitioner had his final asylum court (equivalent to a criminal trial). After he lost said hearing, he began his appeal; but thereafter, he became cognizant via his immigration attorney that said hearing was not recorded; it appears the government may re-start his asylum case anew during his current civil immigration detention—which can take months or years.

GROUND FOUR:

(a) Supporting facts (Be brief. Do not cite cases or law.):

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes

☒ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

Request for Relief

15. State exactly what you want the court to do: *Petitioner prays that this court grant the following: (a) immediately release petitioner under his most recent conditions of ICE-OSUP; (b) enjoin respondents from re-detaining him unless they follow their own agency-rules concerning ICE-OSUP-revocation; (c) enjoin respondents from re-detaining him unless they provide him a pre-deprivation hearing before an impartial decision-maker; (d) Order that the current immigration proceedings against him be permanently terminated, given that his right to due process was fatally prejudiced by the sudden disappearance of the record of his final asylum court hearing; (e) and/or any other relief this court finds just and equitable.*

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Declaration Under Penalty Of Perjury

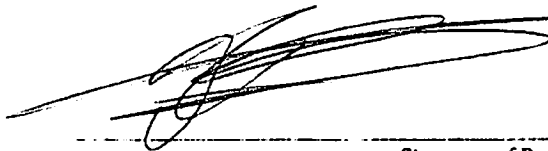
If you are incarcerated, on what date did you place this petition in the prison mail system:

1/07/26

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date:

1/07/26



Signature of Petitioner

Signature of Attorney or other authorized person, if any

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Certificate of Service

- I, the undersigned, hereby certify that I served a true copy of my habeas petition on 1/08/26; via the following methods, to the following Respondents:
- Via the black/grey box located outside Unit B-4: Laura Hermosillo, Seattle ICE Field Office Director;
- Via US mail: US Attorney General, Pamela Bondi, 1201 Pacific Ave. Ste 700, Tacoma, WA 98402

Certified by


Juan Bravo-Zambrano
Petitioner

1/08/26

US District Court
Clerk, Seattle WA



JAN 15 2026

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

Re: Bravo-Zambrano v. Bondi et al

Dear clerk:

- Please find enclosed herewith my habeas petition and a copy thereof. The \$5 ~~manley~~ money order was sent in a separate white envelope on same day, according to the mail room.

Best regards,

A large, stylized handwritten signature in black ink, appearing to be "Petitioner".

Petitioner

cc: Respondents

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