

District Judge James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JUAN BRAVO-ZAMBRANO,

Petitioner,

v.

PAMELA BONDI, *et al.*,

Respondents.

Case No. 2:26-cv-00167-JLR

FEDERAL RESPONDENTS'¹
RETURN MEMORANDUM

Noted for Consideration:
March 3, 2026

I. INTRODUCTION

This Court should deny Juan Bravo-Zambrano's Petition for a Writ of Habeas Corpus. Dkt. 3, Pet. U.S. Immigration and Customs Enforcement ("ICE") lawfully detains Petitioner pursuant to 8 U.S.C. § 1226(c) following the revocation of his Order of Release on Recognizance ("OREC") previously issued by the U.S. Department of Homeland Security ("DHS"). Petitioner claims that his re-detention is unlawful and violates due process because he was not provided with written notice and a pre-deprivation hearing. He requests this Court to order his immediate release from the Northwest ICE Processing Center ("NWIPC") and further requests an injunction

¹ Respondent Bruce Scott is not a Federal Respondent and is not represented by the U.S. Attorney's Office.

1 barring Federal Respondents from re-detaining him in the future absent certain conditions. Dkt.
2 3, Pet., at 5.

3 Petitioner's request for release should be denied because his detention is consistent with
4 statute as well as due process. Additionally, granting such relief would require this Court to ignore
5 Petitioner's repeated violations of the conditions of his release imposed by both criminal and
6 immigration authorities. *Martinez Hernandez v. Andrews*, No. 1:25-cv-01035, 2025 WL
7 2495767, at *12 (E.D. Cal. Aug. 28, 2025) (finding post-deprivation process adequate due to
8 Alternatives to Detention ("ATD") violations). Moreover, Petitioner has not demonstrated that
9 the extraordinary remedy of a permanent injunction is warranted.

10 Accordingly, Federal Respondents respectfully request that the Court deny the Petition.

11 II. LEGAL AND FACTUAL BACKGROUND

12 A. 8 U.S.C. § 1226(c)

13 The INA provides the framework for the arrest, detention, and release of noncitizens
14 during and following their removal proceedings. *See Johnson v. Guzman Chavez*, 594 U.S. 523,
15 527 (2021). The detention periods are generally referred to as "pre-order" (meaning before the
16 entry of a final order of removal) and "post-order" (meaning after the entry of a final order of
17 removal). *Compare* 8 U.S.C. § 1226 (authorizing pre-order detention) with § 1231(a) (authorizing
18 post-order detention).

19 As relevant here, § 1226(c) mandates detention for individuals who have been convicted
20 of certain criminal offenses – including aggravated felonies and controlled substance offenses
21 under §§ 1227(a)(2)(A)(iii), and (B)(i), respectively.² 8 U.S.C. § 1226(c). Congress enacted §

22
23
24 ² While not implicated in the instant case, there is a narrow exception under § 1227(a)(2)(B)(i) for individuals convicted of only "a single offense involving possession for one's own use of 30 grams or less of marijuana." *See Medina v. Ashcroft*, 393 F.3d 1063, 1065 (9th Cir. 2005) (quoting 8 U.S.C. § 1227(a)(2)(B)(i)).

1 1226(c) as part of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996
2 (“IIRIRA”), and it sprang from a “concer[n] that deportable criminal aliens who are not detained
3 continue to engage in crime and fail to appear for their removal hearings in large numbers.”
4 *Demore v. Kim*, 538 U.S. 510, 513 (2003). “To address this problem, Congress mandated that
5 aliens who were thought to pose a heightened risk be arrested and detained without a chance to
6 apply for release on bond or parole.” *Nielsen v. Preap*, 586 U.S. 392, 398 (2019); *see also*
7 *Jennings v. Rodriguez*, 583 U.S. 281, 304-05 (2018).

8 Ordinarily, an individual subject to mandatory detention under § 1226(c) may be released
9 ““only if [the Secretary]” decides that release is “necessary to provide protection” for witnesses
10 or others cooperating with a criminal investigation, or their relatives or associates,” which is not
11 at issue in this case. *Nielsen*, 586 U.S. at 398 (quoting 8 U.S.C. § 1226(c)).

12 **B. Petitioner Juan Bravo-Zambrano**

13 Petitioner Juan Bravo-Zambrano is a native and citizen of Mexico. *See* Declaration of
14 Deportation Officer Kurtis Reed (“Reed Decl.”) ¶ 3. On December 29, 2010, Petitioner was
15 admitted to the United States as a Lawful Permanent Resident. *Id.* In April 2019, Petitioner was
16 convicted in the U.S. District Court for the Eastern District of Washington of conspiracy to
17 distribute methamphetamine, cocaine, heroin, and n-phenyl-n propanamide in violation of 21
18 U.S.C. § 846.³ *See* Declaration of Barbara Andrade (“Andrade Decl.”), Ex. B (Apr. 2019 Criminal
19 Judgment); Reed Decl., ¶ 4(a).

20 On August 28, 2019, DHS issued a Notice to Appear (“NTA”), Form I-862, charging
21 Petitioner with removability under Section 1227(a)(2)(A)(iii) as a noncitizen who has been
22 convicted of an aggravated felony relating to the illicit trafficking of a controlled substance as
23

24 ³ *United States v. Bravo Zambrano*, No. 4:15-cr-06049-EFS-19 (E.D. Wash. Apr. 22, 2019), ECF No. 1239.

1 well as a noncitizen convicted of a conspiracy to commit an aggravated felony. *Id.* ¶ 6; Andrade
2 Decl., Ex. A at 3, (NTA). Petitioner was also charged with removability under Section
3 1227(a)(2)(B)(i) as a noncitizen who has been convicted of an offense relating to a controlled
4 substance. *Id.*; Reed Decl., ¶ 6.

5 On October 25, 2019, Petitioner's NTA was filed with the San Francisco Immigration
6 Court. Andrade Decl., Ex. A at 1, (NTA). On May 5, 2020, an immigration judge concluded
7 Petitioner had failed to demonstrate eligibility for relief under the U.N. Convention Against
8 Torture ("CAT") and ordered that he be removed from the United States to Mexico. Andrade
9 Decl., Ex. L (May 2020 Order of the Immigration Judge); Reed Decl., ¶ 7.⁴ Petitioner filed a
10 timely appeal of the immigration judge's decision with the Board of Immigration Appeals
11 ("BIA"). *Id.*, ¶ 9.

12 On May 28, 2020, the district court presiding over a class action suit in which Petitioner
13 was a member and ordered that ICE release Petitioner from custody. *See Zepeda Rivas v.*
14 *Jennings*, No. 3:20-cv-02731-VC (N.D. Cal.), ECF 272 (Bail Order). At the time of his release
15 on bond from immigration detention, Petitioner was subject to a term of supervised release for
16 his criminal conviction. Andrade Decl., Ex. B at 3-5. The settlement agreement entered in *Zepeda*
17 *Rivas* provided that, for three years following the effective date of the agreement, ICE could re-
18 detain a released class member only in certain circumstances, including if the individual posed a
19 threat to public safety, posed a risk of flight, violated a material condition of release, or failed to
20 comply with a parole condition, among other circumstances. *See Zepeda Rivas v. Jennings*, No.
21 3:20-cv-02731-VC (N.D. Cal.), ECF 1205-1, at § III. The three-year period provided under the
22

23 ⁴ The Immigration Judge's May 5, 2020, order reflects a consideration only of Petitioner's request for protection
24 under the CAT. Andrade Decl., Ex. L. Thus, Petitioner's drug trafficking conviction was likely deemed to be a
particularly serious crime which rendered him ineligible for asylum or withholding of removal. *See Hernandez v.*
Garland, 52 F.4th 757, 765 (9th Cir. 2022).

1 settlement agreement expired on June 9, 2025. *Id.*, ECF 1205-1, 1258. After the settlement
2 agreement's three-year period, "ICE's re-arrest and re-detention practices for [c]lass [m]embers
3 will occur pursuant to generally applicable law and policy." *Id.*, ECF 1205-1, at § III.G.

4 On April 9, 2021, Petitioner was arrested for alleged harassment and death threats. Reed
5 Decl., ¶ 4(b); Andrade Decl., Ex. C at 2 (Apr. 2021 Petition for Warrant). On July 16, 2021, the
6 charges were dismissed. Reed Decl., ¶ 4(b). On February 15, 2022, Petitioner was sentenced to
7 three months in prison following repeated violations of the conditions of his supervised release.
8 *Id.*, ¶ 4(c); Andrade Decl., Ex. D (Feb. 2022 Criminal Judgment). Shortly after his release, on
9 July 5, 2022, Petitioner was sentenced to an additional seven months in prison for again violating
10 the conditions of his release. Reed Decl., ¶ 4(d); Andrade Decl., Ex. E (Jul. 2022 Criminal
11 Judgment). On December 1, 2022, Petitioner was released from criminal custody and detained by
12 ICE. Reed Decl., ¶ 10.

13 Petitioner challenged his re-detention pursuant to the terms of the *Zepeda Rivas* settlement
14 agreement, and on March 18, 2023, the U.S. District Court for the Northern District of California
15 ordered that Petitioner be released from ICE custody. *See Zepeda Rivas v. Jennings*, No. 3:20-cv-
16 02731-VC (N.D. Cal.), ECF 1277; Reed Decl., ¶ 11. On March 20, 2023, ICE released Petitioner
17 on an OREC which included the condition that he wear a GPS ankle monitor. *Id.*, at ¶ 12.

18 In May 2023, the Board of Immigration Appeals ("BIA") remanded Petitioner's case for
19 reconsideration of his claim for protection under the CAT. *Id.*, at ¶ 13.

20 On March 19, 2024, Petitioner was sentenced to nine months in prison following repeated
21 violations of the conditions of his supervised release. *Id.*, ¶ 4(f); Andrade Decl., Ex. F (Mar. 2024
22 Criminal Judgment). On September 27, 2024, Petitioner was released from federal detention and
23 taken into ICE custody. Reed Decl., ¶ 14. Pursuant to the terms of the *Zepeda Rivas* settlement,
24

1 ICE released Petitioner on an OREC. *Id.*; Andrade Decl., Ex. G (Sep. 2024 OREC); Ex. H (Sep.
2 2024 I-213).

3 On June 25, 2025, Petitioner appeared with counsel for a hearing at the San Francisco
4 Immigration Court. Reed Decl., ¶ 15. At the conclusion of that hearing, the immigration judge
5 informed Petitioner and his attorney that he would issue an oral decision denying Petitioner's
6 application for protection under the CAT later that day.⁵ Andrade Decl., Ex. K (Jun. 2025 Order
7 of the Immigration Judge). Petitioner was again ordered removed to Mexico, and on July 18,
8 2025, Petitioner filed a timely appeal of the immigration judge's decision with the BIA. Reed
9 Decl., ¶¶ 15-16.

10 From October 2024 to September 2025, Petitioner violated the conditions of his OREC
11 fifteen times. *Id.*, ¶ 17(a)-(o). On September 27, 2025, ICE issued a warrant for Petitioner's arrest.
12 Andrade Decl., Ex. I (Sep. 2025 Warrant).⁶ This determination was based on "the pendency of
13 ongoing removal proceedings against" Petitioner, *id.*, as well as the fact that he "had been
14 approved for enforcement action." *Id.*, Ex. J at 2 (Sep. 2025 I-213); Reed Decl., ¶ 17. On
15 September 27, 2025, ICE arrested Petitioner at his home. Andrade Decl., Ex. J at 2. Petitioner
16 was subsequently transferred and booked into the NWIPC, where he remains detained. Reed
17 Decl., ¶¶ 18, 24. Petitioner has not appeared before an immigration judge for a bond hearing. *Id.*,
18 ¶ 23.

19 III. LEGAL STANDARD

20 "The district courts of the United States ... are courts of limited jurisdiction. They possess
21 only that power authorized by Constitution and statute." *Exxon Mobil Corp. v. Allopah Servs.*,
22

23 ⁵ As discussed further *infra*, the June 25, 2025, oral decision of the immigration judge was not properly transcribed.

24 ⁶ Federal Respondents acknowledge the warrant for Petitioner's arrest contains an apparent error that suggests it was served on September 26, 2025, which would pre-date the issuance of the warrant itself. Andrade Decl., Ex. I.

1 *Inc.*, 545 U.S. 546, 552 (2005) (internal quotations omitted). “[T]he scope of habeas has been
2 tightly regulated by statute, from the Judiciary Act of 1789 to the present day.” *Dep’t of Homeland*
3 *Sec. v. Thuraissigiam*, 591 U.S. 103, 125 n.20 (2020). Title 28 U.S.C. § 2241 provides district
4 courts with jurisdiction to hear federal habeas petitions. To warrant a grant of habeas corpus, the
5 burden is on the petitioner to prove that his or her custody is in violation of the Constitution, laws,
6 or treaties of the United States. *See* 28 U.S.C. § 2241(c)(3); *Lambert v. Blodgett*, 393 F.3d 943,
7 969 n.16 (9th Cir. 2004).

8 IV. ARGUMENT

9 **A. Petitioner is lawfully detained under § 1226(c) and his re-detention did not require**
10 **a pre-deprivation hearing to comport with due process.**

11 Because Petitioner’s removal proceedings remain pending, his detention is governed by
12 the framework of § 1226(c). *See Jennings*, 583 U.S. at 283 (explaining “§ 1226(c) makes clear
13 that detention of aliens within its scope *must* continue “pending a decision” on removal.”).
14 Petitioner’s April 10, 2019, conviction fits squarely within the enumerated grounds of mandatory
15 detention under § 1226(c). Andrade Decl., Exs. A-B. As noted above, a noncitizen convicted of
16 an aggravated felony and/or a controlled substance offense is subject to mandatory detention
17 because Congress has expressly required detention without bond for individuals removable on
18 those grounds. *Jennings*, 583 U.S. at 303.

19 In *Demore*, the Supreme Court upheld the constitutionality of § 1226(c) on a facial
20 challenge. *Demore*, 538 U.S. at 513. Later, in *Nielsen*, the Supreme Court held that mandatory
21 detention under § 1226(c) applies even if the government does not immediately detain a criminal
22 noncitizen upon release from a correctional facility but noted that its decision “on the meaning of
23 that statutory provision does not foreclose as-applied challenges—that is, constitutional
24 challenges to applications of the statute.” *Nielsen*, 586 U.S. at 420.

1 Petitioner does not challenge the length of his current detention without a bond hearing as
2 unconstitutional. *See, e.g., Perera v. Jennings*, 598 F. Supp. 3d 736, 744 (N.D. Cal. 2022). Rather,
3 Petitioner challenges his re-detention in September 2025 as violative of his right to due process.
4 Dkt. 3, Pet. at 3-4. He asserts that DHS was required to provide him with written notice and a pre-
5 detention hearing before a neutral arbiter. *Id.*

6 Federal Respondents acknowledge that district courts have determined that the revocation
7 of an OREC requires a pre-detention hearing to determine if that noncitizen is a flight risk or a
8 danger to the community. *See, e.g., E.A.T.-B. v. Wamsley*, No. 2:25-cv-1192, 2025 WL 2402130,
9 at *5 (W.D. Wash. Aug. 19, 2025). Although many district courts have found that due process
10 requires pre-detention hearings prior to the re-detention of noncitizens, for the reasons set forth
11 below, due process did not require a pre-detention hearing here.

12 “Due process is flexible and calls for such procedural protections as the particular situation
13 demands.” *Mathews v. Eldridge*, 424 U.S. 319, 334 (1976). *Mathews* calls for an analysis of (1)
14 “the private interest that will be affected by the official action,” (2) “the risk of an erroneous
15 deprivation of such interest through the procedures used, and probable value, if any, of additional
16 or substitute procedural safeguards,” and (3) the Government’s interest. *Id.*, at 334-35.

17 As to the first *Mathews* factor, Federal Respondents recognize that Petitioner had some
18 liberty interest in his continued freedom from detention while on an OREC. However, that liberty
19 interest was conditional, and was always subject, in part, on Petitioner not committing any crimes
20 and complying with the requirements of his release. Andrade Decl., Ex. G at 1, 3. Since his
21 September 2024 release from ICE detention, Petitioner has amassed more than a dozen OREC
22 violations and two convictions for driving without a license. Reed Decl., ¶¶ 4(g)-(h), 17(a)-(o).
23 The existence of numerous OREC violations, as well as prior probation violations, underscores
24 that Petitioner has already been afforded conditional liberty and has failed to adhere to its terms.

1 *Id.*, at ¶¶ 4(a)-(h), 17(a)-(o); Andrade Decl., Exs. B-F. Petitioner cannot now claim that Federal
2 Respondents promised him ongoing, limitless freedom from detention, especially in the face of
3 his repeated failure to adhere to these conditions.

4 Turning to the second *Mathews* factor, the risk of a constitutionally significant and
5 erroneous deprivation of Petitioner's liberty did not necessitate a pre-deprivation hearing. The
6 Supreme Court has held that "the Constitution requires some kind of hearing *before* the State
7 deprives a person of liberty or property." *Zinerman v. Burch*, 494 U.S. 113, 127 (1990) (emphasis
8 in the original). But in the same opinion, the Court also recognized that a pre-deprivation hearing
9 is not appropriate in every situation. *Id.* at 128 (noting there may be "special case[s]" where a pre-
10 deprivation hearing is impracticable). Petitioner's re-detention qualifies as a special case due to
11 his pattern of noncompliance with the conditions of his release.

12 Here, Petitioner is subject to mandatory detention under §1226(c). Where detention is
13 mandatory, a pre-detention hearing would serve no purpose because release is not legally available.
14 *Calderon v. Noem*, No. 2:25-cv-2136, 2025 WL 3754042, at *8 (W.D. Wash. Dec. 29, 2025)
15 ("The cases cited by Mr. Calderon are inapposite because none of them involved mandatory
16 detention (under the LRA or otherwise).") "Accordingly, a pre-detention hearing could only have
17 one outcome: detention." *Id.*

18 In *Martinez Hernandez v. Andrews*, the district court found that allegations of ATD
19 violations that "are not obviously pretextual as in *E.A.T.-B*⁷" provided at least an arguable basis
20 "that providing [the petitioner] with notice and a pre-deprivation hearing would have been
21 impracticable and/or would have motivated his flight." *Martinez Hernandez*, 2025 WL 2495767,
22 at *11-12. Instead of a pre-deprivation hearing, the district court found that any risk of erroneous
23

24 ⁷ *E.A.T.-B. v. Wamsley*, No. 2:25-cv-1192, 2025 WL 2402130 (W.D. Wash. Aug. 19, 2025).

1 deprivation could be reduced through a “prompt, post-deprivation process.” *Id.* (collecting cases).
2 Given Petitioner’s repeated criminal offenses, OREC violations, and status as a noncitizen subject
3 to mandatory detention under § 1226(c), the risk of erroneous deprivation would have been
4 minimal, while the public-safety and administrative burdens of providing him with advance notice
5 and process would have been substantial. These objective factors provided ICE with at least an
6 arguable basis for Petitioner’s re-detention without notice and a pre-deprivation hearing.

7 Regarding the third *Mathews* factor, the Ninth Circuit has emphasized that the *Mathews*
8 test and procedural safeguards “must account for the heightened government interest in the
9 immigration detention context.” *Rodriguez Diaz v. Garland*, 53 F.4th 1189, 1206 (9th Cir. 2022).
10 As the Supreme Court noted in *Demore*, unlike discretionary detention under § 1226(a), § 1226(c)
11 reflects Congress’ determination that a limited class of removable noncitizens warrant mandatory
12 detention during the pendency of removal proceedings. *Demore*, 538 U.S. at 518. The Court
13 highlighted the “wholesale failure” by immigration authorities in dealing with increasing rates of
14 criminal activity by noncitizens as one of the main legislative concerns behind the enactment of
15 IIRIRA. *Id.* at 518-21. The government’s interests in public safety and prevention of flight are
16 therefore substantial and heightened by Petitioner’s repeated defiance of prior conditions of
17 supervised release.

18 Accordingly, due process does not require a pre-deprivation hearing in all circumstances
19 where individuals are detained after being released, including for Petitioner here.

20 **B. Petitioner’s due process challenge to his removal proceedings must be dismissed for**
21 **lack of subject matter jurisdiction.**

22 “[D]istrict courts retain jurisdiction under 28 U.S.C. § 2241 to consider habeas challenges
23 to immigration detention that are sufficiently independent of the merits of [a] removal
24

1 order.” *Lopez-Marroquin v. Barr*, 955 F.3d 759, 759 (9th Cir. 2020) (citing *Singh v. Holder*, 638
2 F.3d 1196, 1211–1212 (9th Cir. 2011)).

3 Petitioner alleges that his individual merits hearing on June 25, 2025,⁸ was not properly
4 recorded and further alleges that the government may seek to “re-start his [removal proceedings]
5 anew.” Dkt. 3, Pet. at 4. Petitioner requests the termination of his removal proceedings on due
6 process grounds. Dkt. 3, Pet. at 4-5. As a threshold matter, both Petitioner’s June 25, 2025,
7 immigration hearing, as well as the immigration judge’s oral decision denying his applications
8 for relief, were properly recorded.⁹ However, it appears the *transcript* of Petitioner’s hearing did
9 not include the immigration judge’s oral decision. Petitioner, through counsel, has filed a motion
10 to remand with the BIA so that the oral decision may be properly transcribed. Reed Decl., ¶ 20.
11 Notwithstanding the above, because habeas jurisdiction is proper only for challenges to
12 immigration detention itself, not the merits of an underlying order of removal, the Court should
13 deny Petitioner’s request for lack of subject matter jurisdiction.

14 As the Ninth Circuit has explained, when a claim by a noncitizen, “however it is framed,
15 challenges the procedure and substance of an agency determination that is inextricably linked to
16 the order of removal, it is prohibited by section 1252(a)(5)” of the INA. *See Martinez v.*
17 *Napolitano*, 704 F.3d 620, 622-23 (9th Cir. 2012). Section 1252(a)(5) provides that “[t]he
18 exclusive means to challenge an order of removal is the petition for review process.” *Id.* at 622.

19 Petitioner here raises a constitutional challenge to the adequacy of his June 25, 2025,
20 removal hearing, which is better suited to review by the Ninth Circuit. *See W.T.M. v. Bondi*, No.
21 2:25-CV-02428-RAJ-BAT, 2026 WL 262583, at *2 (W.D. Wash. Jan. 30, 2026). The

22 _____
23 ⁸ There is no record of Petitioner appearing for an immigration hearing on July 24, 2025. Dkt. 3, Pet. at 4. Federal
24 Respondents believe Petitioner’s arguments are in reference to his June 25, 2025, immigration hearing at the San
Francisco Immigration Court. Andrade Decl., Ex. K.

⁹ Upon request, Federal Respondents are willing and able to provide both Petitioner and the Court a compact disk
 (“CD”) of the digital audio recording of the June 25, 2025, oral decision of the immigration judge.

1 immigration judge's determination that Petitioner is ineligible for relief under the CAT is the
2 basis of his removal order. Andrade Decl., Ex. K at 2-6. Should Petitioner be ultimately
3 unsuccessful in his appeal to the BIA, he will have the opportunity to file a petition for review
4 before the Ninth Circuit, where he may raise any due process challenges arising from the
5 adequacy of his removal proceedings.

6 **C. Petitioner cannot meet the required elements for injunctive relief.**

7 This Court should deny Petitioner's request for permanent injunctive relief barring future
8 detention without certain conditions. *See* Dkt. 3, Pet., at 5; *see also eBay Inc. v. MercExchange,*
9 *L.L.C.*, 547 U.S. 388, 391 (2006) (explaining factors required for permanent injunctive relief).

10 Petitioner seeks injunctive relief that would require this Court to speculate as to his future
11 detention. "To have standing to assert a claim for prospective injunctive relief, a plaintiff must
12 demonstrate 'that he is realistically threatened by a repetition of [the violation].'" *G.A.A. v.*
13 *Chestnut*, No. C25-1102, 2025 WL 3251316, at *7 (E.D. Cal. Nov. 21, 2025) (quoting *City of Los*
14 *Angeles v. Lyons*, 461 U.S. 95, 109 (1983)). Petitioner has not shown that his future detention is
15 imminent or even likely, as opposed to contingent on circumstances not currently present,
16 including Petitioner's future conduct and compliance with legal obligations or case-specific
17 immigration enforcement determinations. Because Petitioner's re-detention rests on a series of
18 speculative circumstances that may never occur, he cannot show that he will suffer irreparable
19 harm absent the requested injunctive relief.

20 In sum, Petitioner is lawfully detained, and this Court should deny his request for
21 immediate release from immigration detention as well as his request for injunctive relief.

IV. CONCLUSION

For the foregoing reasons, Federal Respondents respectfully request that this Court deny the Petition.

DATED this 26th day of February, 2026.

Respectfully submitted,

s/ Barbara Andrade

BARBARA ANDRADE, Fla. Bar No. 1025074

Special Assistant United States Attorney

United States Attorney's Office

Western District of Washington

700 Stewart Street, Suite 5220

Seattle, Washington 98101-1271

Phone: 206-553-7970

Fax: 206-553-4067

Email: barbara.andrade@usdoj.gov

Attorney for Federal Respondents

I certify that this memorandum contains 3,345 words, in compliance with the Local Civil Rules.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee in the Office of the United States Attorney for the Western District of Washington and of such age and discretion as to be competent to serve papers.

I further certify on today's date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the following CM/ECF participant(s):

- 0 -

I further certify on today's date, I arranged for service of the foregoing on the following non-CM/ECF participant(s), via Certified Mail with return receipt, postage prepaid, addressed as follows:

Juan Bravo-Zambrano, *Pro Se Petitioner*
A#
NW ICE Processing Center
1623 E. J Street, Suite 5
Tacoma, WA 98421-1615

DATED this 26th day of February, 2026.

s/ Katie Reed-Johnson

KATIE REED-JOHNSON, Legal Assistant
United States Attorney's Office
Western District of Washington
700 Stewart Street, Suite 5220
Seattle, WA 98101
Phone: (206) 553-7970
Fax: (206) 553-4073
Email: katherine.reed-johnson@usdoj.gov