Vicky J Currie, WSBA #24192
Currie Law Firm
1008 S Yakima Ave STE 100
Tacoma, WA 98405
253.588.9922
currielawfirm@gmail.com

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

RIVAS, DARVI JESUS Petitioner, v. BRUCE SCOTT, Warden of the Northwest ICE Processing Center; MARKWAYNE MULLIN, Secretary of the U.S. Department of Homeland Security Respondents.	CIVIL ACTION NO. 2:26-cv-02606 **PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241**

I. INTRODUCTION

Petitioner Darvi Jesus Rivas ("Petitioner") brings this Petition for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 challenging his unconstitutional immigration detention.

This case concerns the arbitrary deprivation of Petitioner's liberty based upon a fundamentally inaccurate understanding of his immigration history. In November 2022, Respondents determined that Petitioner could safely remain in the community and released him on an Order of Release on Recognizance ("OREC"). Petitioner validated that determination by complying with every reporting requirement, remaining openly available to immigration authorities, committing no crimes, and continuing to pursue lawful immigration relief. After

USCIS granted Petitioner Temporary Protected Status ("TPS"), DHS itself moved to dismiss his removal proceedings, thereby terminating his supervision and permitting jurisdiction over his pending asylum application to return to USCIS. Petitioner thereafter remained openly in the community, continued to make himself available to immigration authorities, and attempted to maintain his humanitarian protection by timely filing a TPS re-registration application, believing that it would be adjudicated in the ordinary course.

Nearly two years later, Respondents initiated entirely new removal proceedings and immediately re-detained Petitioner. Yet, as recognized in *Sagrero-Perez v. Scott*, No. 2:26-cv-00932-TSZ, Dkt. 19 (W.D. Wash. May 11, 2026), the commencement of new removal proceedings does not permit DHS to disregard its prior dismissal or deprive a noncitizen of liberty without a lawful, contemporaneous basis for detention. Instead, Respondents relied upon an administrative record that materially misstated Petitioner's immigration history by confusing the dismissal of his removal proceedings with the status of his TPS, asserting that he had no pending immigration applications despite contrary agency records, and making other factual assertions inconsistent with Respondents' own files. Those errors formed the basis for depriving Petitioner of his liberty despite years of demonstrated compliance and without identifying any material change in his conduct or circumstances.

This Petition challenges Respondents' decision to detain Petitioner without process, based upon material factual errors, an internally inconsistent administrative record, and an unexplained departure from their own prior determination that he could safely remain at liberty. Because Respondents revoked Petitioner's liberty without an accurate factual basis or the procedural protections required by the Fifth Amendment, his continued detention is unlawful and habeas relief is warranted.

II. JURISDICTION AND VENUE

This Court has jurisdiction pursuant to 28 U.S.C. § 2241 because Petitioner is in custody under the authority of the United States and challenges the legality of that custody. Jurisdiction is also proper under 28 U.S.C. § 1331 and the Due Process Clause of the Fifth Amendment.

Venue lies in the Western District of Washington because Petitioner is detained at the Northwest ICE Processing Center in Tacoma, Washington.

III. PARTIES

Petitioner is currently detained by U.S. Immigration and Customs Enforcement ("ICE") at the Northwest ICE Processing Center. Respondent Bruce Scott is the Warden of NWIPC and Petitioner's immediate physical custodian. He is the proper respondent under *Rumsfeld v. Padilla*, 542 U.S. 426 (2004). Respondent Markwayne Mullin is the Secretary of the U.S. Department of Homeland Security.

IV. LEGAL STANDARD

The writ of habeas corpus permits individuals to challenge unlawful executive detention. 28 U.S.C. § 2241(c)(3). Federal courts retain jurisdiction to review the legality of immigration detention and to order release where that detention violates the Constitution or laws of the United States. *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001).

Although immigration detention is civil in nature, it is subject to constitutional limitations. Detention must bear a reasonable relationship to its statutory purpose and may not become arbitrary or punitive. *Id.* at 690.

The Fifth Amendment further requires that any deprivation of liberty be accompanied by adequate procedural safeguards. The "fundamental requirement of due process is the opportunity

to be heard at a meaningful time and in a meaningful manner." *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976).

Federal courts have long recognized that habeas corpus is the proper vehicle to challenge immigration detention that lacks a lawful statutory basis or fails to satisfy constitutional due process. *Demore v. Kim*, 538 U.S. 510, 516-17 (2003); *Singh v. Holder*, 638 F.3d 1196, 1202-03 (9th Cir. 2011); *Zadvydas v. Davis*, 533 U.S. 678, 687-88, 699-700 (2001).

V. FACTUAL BACKGROUND

A. Immigration and Detention History

Petitioner is a native and citizen of Venezuela. DHS initiated removal proceedings against Petitioner in 2022 and released him on an OREC on November 8, 2022, subject to periodic reporting requirements. While his removal proceedings were pending, Petitioner appeared for scheduled ICE check-ins. ICE continued Petitioner's release following each appearance.

On June 10, 2024, USCIS granted Petitioner TPS under the Venezuela designation. Thereafter, on September 16, 2024, the Immigration Judge dismissed Petitioner's removal proceedings without prejudice. DHS acknowledges the dismissal in its own records.

Before his TPS designation expired, Petitioner timely filed a new Form I-821 to re-register for TPS in April 2025, and USCIS issued a receipt notice acknowledging receipt of the application. At the time, Petitioner believed his TPS re-registration application would be adjudicated in the ordinary course and was unaware that the subsequent termination of Venezuela's TPS designation would prevent approval of his application. He therefore continued to believe he was pursuing lawful humanitarian protection through the process established by the Government and remained openly available to immigration authorities.

On July 3, 2026, ICE arrested Petitioner and served him with a new Notice to Appear, thereby initiating new removal proceedings. Petitioner has remained detained at the Northwest ICE Processing Center since that date.

B. Family and Community Ties

Petitioner has developed substantial family and community ties during his years in the United States. He is the father of a United States citizen child and has established a stable life in this country. Those longstanding ties demonstrate that Petitioner has every incentive to remain in the community, comply with immigration proceedings, and continue pursuing lawful relief, as he has consistently done throughout his immigration history.

C. Ongoing Removal Proceedings and Relief

Petitioner is currently in removal proceedings before the Immigration Court in Tacoma, Washington. Petitioner intends to pursue all forms of relief for which he is eligible, including asylum and withholding of removal. On July 22, 2026, the Immigration Court issued an order requiring Petitioner to pay the Annual Asylum Fee, specifically finding that his Form I-589 has been pending for more than 365 days since October 1, 2024. In addition, Petitioner previously obtained TPS and timely filed a TPS re-registration application with USCIS in April 2025.

D. Criminal History

Petitioner has no known criminal history. The records submitted by DHS do not identify any criminal convictions or arrests forming the basis for his detention.

E. Timeline of Petitioner's Prior Removal Proceedings, TPS, and Immigration Proceedings

- **November 8, 2022:** DHS initiated removal proceedings by serving Petitioner with a Notice to Appear and released him on an OREC, subject to reporting requirements.

- **May 4, 2023:** Petitioner appeared for his scheduled ICE check-in. ICE continued his release and scheduled a subsequent reporting date.
- **November 6, 2023:** Petitioner appeared for his scheduled ICE check-in. ICE continued his release and scheduled another reporting date.
- **April 1, 2024:** Petitioner appeared for another scheduled ICE check-in. ICE continued Petitioner's release.
- **June 10, 2024:** USCIS approved Petitioner's application for TPS under the Venezuela designation.
- **September 16, 2024:** The Immigration Judge dismissed Petitioner's removal proceedings without prejudice. DHS acknowledges the dismissal in its 2026 Record of Deportable/Inadmissible Alien.
- **April 12, 2025:** Petitioner filed a Form I-821 to re-register for TPS. USCIS issued a Form I-797C Receipt Notice acknowledging receipt of the application.
- **July 3, 2026:** ICE arrested Petitioner and served him with a new Notice to Appear commencing new removal proceedings.
- **July 22, 2026:** The Immigration Court issued an Order requiring Petitioner to pay the Annual Asylum Fee, stating that Petitioner's Form I-589 had been pending for more than 365 days since October 1, 2024.

VI. ARGUMENT

A. Respondents' Detention Decision Was Based Upon Material Factual Errors and an Internally Inconsistent Administrative Record

Before depriving an individual of his physical liberty, the Government must base its decision on an accurate understanding of the relevant facts. An agency acts arbitrarily and capriciously when it relies on factual errors, fails to consider important aspects of the record, or

reaches conclusions that are contradicted by the evidence before it. *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983).

That did not occur here. Rather than conducting an individualized review of Petitioner's circumstances, Respondents relied upon an administrative record containing multiple material factual errors and internal inconsistencies regarding Petitioner's immigration history. Those inaccuracies were not minor clerical mistakes. They concerned the very facts upon which Respondents purportedly relied to justify revoking Petitioner's liberty.

First, the Form I-213 incorrectly states that Petitioner's "TPS was dismissed in 2024" and that he thereafter "failed to leave the United States." That is not what occurred. Petitioner's TPS was granted by USCIS; it was never dismissed. Instead, it was Petitioner's removal proceedings that were dismissed upon DHS's own motion, allowing jurisdiction over his pending asylum application to return to USCIS. Respondents' own supervision records confirm this distinction. Petitioner's OREC remained in effect only while removal proceedings were pending, and his supervision records prominently reflect that the proceedings were "DISMISSED" as of October 16, 2024, terminating his reporting obligations. Thus, the premise that Petitioner somehow "failed to leave" following the dismissal is unsupported by Respondents' own records.

Second, Respondents asserted that Petitioner had no pending immigration applications. That statement likewise conflicts with the record. Petitioner's original TPS designation expired on April 2, 2025. Before that expiration, however, Petitioner timely filed a TPS re-registration application, which USCIS accepted for processing. Accordingly, although Petitioner's original TPS grant had expired, his re-registration application remained pending when Respondents re-detained him. In addition, Respondents themselves later initiated new removal proceedings in which the Immigration Court recognized that Petitioner's Form I-589 had remained pending for

cannot simultaneously contend that Petitioner had no pending immigration applications while treating his asylum application as continuously pending for purposes of imposing statutory obligations. Those positions cannot be reconciled.

Third, the Form I-213 states that Petitioner expressed no fear of returning to Venezuela. That assertion is difficult to reconcile with Respondents' own treatment of Petitioner's case. DHS previously placed Petitioner into removal proceedings following a positive credible fear determination, permitted him to pursue asylum, granted him TPS, and allowed his asylum application to remain pending. Respondents provide no explanation for how those facts can be reconciled with the conclusory assertion that Petitioner expressed no fear of returning to Venezuela. This unexplained inconsistency further demonstrates that Respondents failed to accurately evaluate Petitioner's immigration history before depriving him of his liberty.

Viewed individually, each of these errors calls into question the reliability of Respondents' detention decision. Viewed collectively, they demonstrate something more significant: Respondents did not conduct the careful, individualized assessment required before revoking Petitioner's liberty. Instead, Respondents relied upon an internally inconsistent administrative record that confused the dismissal of Petitioner's removal proceedings with the status of his TPS, misstated his immigration history, overlooked his pending applications, and reached conclusions contradicted by Respondents' own records. Because Respondents' detention decision rests upon material factual errors and an internally inconsistent administrative record, it is arbitrary, capricious, and inconsistent with the requirements of due process. See *State Farm*, 463 U.S. at 43.

B. Respondents Arbitrarily Revoked Petitioner's Liberty Without Identifying Any Material Change in Circumstances Despite Petitioner's Years of Demonstrated Compliance

The purpose of civil immigration detention is to ensure appearance at future proceedings and, where authorized, to protect the community—not to impose punishment. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Demore v. Kim*, 538 U.S. 510, 528 (2003).

Respondents previously determined that Petitioner could safely remain in the community by releasing him on an OREC in November 2022. **That determination reflected DHS's conclusion that Petitioner did not pose a danger or a risk of flight and could safely remain in the community while his immigration proceedings were pending.**

Every noncitizen released on an OREC pursuant to 8 U.S.C. § 1226(a) has necessarily been found by DHS to pose neither a danger nor a flight risk. See *Ortega-Cervantes v. Gonzales*, 501 F.3d 1111, 1115–16 (9th Cir. 2007); *Ledesma Gonzalez v. Bostock*, No. 25-cv-01404-JNW-GJL, 2025 WL 2841574, at *4 (W.D. Wash. Oct. 7, 2025). Moreover, once DHS has exercised its discretionary authority to release a noncitizen pursuant to § 1226(a), the Due Process Clause requires meaningful procedural safeguards before that liberty may be revoked. See *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972); *United States v. Caceres*, 440 U.S. 741, 760 (1979). These protections further underscore that release on an OREC is not granted lightly, but only after DHS determines that the noncitizen does not pose a danger to the community and is likely to appear for future proceedings.

Petitioner's conduct thereafter confirmed that DHS's decision was correct in releasing Petitioner on an OREC. While subject to supervision, Petitioner complied with every reporting requirement imposed by DHS, remained continuously available to immigration authorities, committed no crimes, violated no conditions of release, and never absconded. Rather than

demonstrating that detention was necessary, Petitioner's conduct demonstrated that release under supervision successfully achieved the Government's objectives.

In September 2024, DHS moved to dismiss Petitioner's removal proceedings, and the Immigration Judge granted that motion. With the dismissal of those proceedings, Petitioner's OREC supervision ended because there were no longer pending removal proceedings requiring continued reporting. Respondents' own supervision records reflect this fact, prominently marking Petitioner's case as "DISMISSED" and terminating his reporting obligations. Following the dismissal, Petitioner continued living openly in the community, accumulated no criminal history, remained available to immigration authorities, and attempted to maintain lawful humanitarian protection by timely filing a TPS re-registration application on or around April 12, 2025. Rather than evading immigration authorities or abandoning the legal process, Petitioner continued pursuing the immigration benefits he understood to be available to him. His conduct reflects continued compliance with the immigration system, not an attempt to avoid it. There is no evidence that he engaged in any conduct suggesting he had become either a danger to the community or a flight risk. To the contrary, Petitioner's circumstances became even more favorable.

Nearly two years after determining that detention was unnecessary—and after terminating both Petitioner's removal proceedings and his supervision—Respondents initiated entirely new removal proceedings and immediately detained him. Yet Respondents identify no intervening event that justified this dramatic reversal. There was no criminal conduct, no failure to report, no absconding, no violation of supervision, and no other material change in Petitioner's circumstances. Instead, the only material change was Respondents' own decision to commence new removal proceedings.

The commencement of new removal proceedings, standing alone, cannot justify renewed detention where Respondents themselves previously determined that Petitioner could safely remain at liberty and Petitioner's conduct consistently confirmed that determination. As recognized in *Sagrero-Perez v. Scott*, once DHS voluntarily dismisses removal proceedings, it cannot simply disregard that dismissal and proceed as though the prior proceedings continuously justified detention. Rather, Respondents must establish a lawful, contemporaneous basis for depriving Petitioner of his liberty in the new proceedings.

Respondents have identified no such basis. Instead, they simply reversed course despite Petitioner's demonstrated compliance with every condition of his release, his positive immigration history, and the absence of any material change in circumstances. An agency acts arbitrarily when it departs from a prior determination without acknowledging or reasonably explaining the change. *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983); *FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 515-16 (2009). Because Respondents have identified no material change in Petitioner's circumstances that warranted renewed detention, the decision to deprive him of his liberty was arbitrary, capricious, and inconsistent with the Due Process Clause.

C. Petitioner's Continued Detention Violates Due Process

The Fifth Amendment prohibits the Government from depriving any person of liberty without due process of law. Civil immigration detention implicates one of the most fundamental liberty interests protected by the Constitution. As the Supreme Court has recognized, "[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Accordingly, before the Government may revoke an individual's liberty, it

must employ procedures that are fundamentally fair and reasonably calculated to prevent erroneous deprivations of that liberty. *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976); *Landon v. Plasencia*, 459 U.S. 21, 32-34 (1982).

The procedures employed here failed that constitutional standard. Petitioner's liberty was not revoked pursuant to an individualized determination based upon an accurate understanding of the facts. Instead, Respondents relied upon a materially inaccurate and internally inconsistent administrative record, failed to consider important aspects of Petitioner's immigration history, and now seek to defend the detention through post hoc explanations rather than the contemporaneous reasoning that supported the decision when it was made. Such procedures create an unacceptably high risk of erroneous deprivation of liberty.

The constitutional deficiencies were compounded by Respondents' failure to provide Petitioner with a meaningful opportunity to obtain the assistance of counsel before his initial hearing. Although counsel learned that DHS had served Petitioner with a new Notice to Appear, counsel could not timely enter an appearance because the newly initiated proceedings were unavailable through EOIR's electronic filing system. Without access to the case, counsel could not review the charging documents, examine the evidence underlying Petitioner's detention, or adequately prepare for the initial hearing. Respondents further delayed filing their evidence until July 21, 2026—one day before Petitioner's July 22, 2026 hearing—depriving counsel of a meaningful opportunity to review and respond to the Government's allegations. Due process requires more than merely scheduling a hearing; it requires a meaningful opportunity to be heard at a meaningful time and in a meaningful manner. *Mathews*, 424 U.S. at 333.

Application of the *Mathews* factors confirms that the procedures employed here were constitutionally inadequate. Petitioner's interest in remaining free from civil detention is

substantial. *Zadvydas*, 533 U.S. at 690. The risk of erroneous deprivation was extraordinarily high because Respondents relied upon an inaccurate administrative record and failed to provide procedures sufficient to identify and correct those errors before revoking Petitioner's liberty. Conversely, Respondents had little governmental interest in dispensing with those basic procedural safeguards, particularly where Petitioner had successfully complied with nearly two years of supervision and nearly two additional years of lawful, open residence in the community before his re-detention.

Because Respondents deprived Petitioner of his liberty through procedures that were neither fair nor reliable, Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment.

D. Exhaustion Is Not Required

Petitioner is not required to exhaust administrative remedies before seeking habeas relief under 28 U.S.C. § 2241. This Petition challenges the legality of Respondents' exercise of detention authority and alleges violations of the Fifth Amendment's Due Process Clause. Those are legal and constitutional questions that neither an Immigration Judge nor the Board of Immigration Appeals has authority to resolve. See *Singh v. Holder*, 638 F.3d 1196, 1202-03 (9th Cir. 2011).

Moreover, exhaustion is prudential rather than jurisdictional and is excused where administrative remedies are inadequate, futile, or incapable of preventing irreparable harm. *McCarthy v. Madigan*, 503 U.S. 140, 146-49 (1992); *Laing v. Ashcroft*, 370 F.3d 994, 1000-01 (9th Cir. 2004). Immigration Judges cannot determine whether DHS lawfully exercised its detention authority, whether Respondents acted arbitrarily in revoking Petitioner's liberty, or whether Respondents' actions violated the Fifth Amendment. Nor can they order the habeas

relief requested here. Requiring Petitioner to continue litigating his removal proceedings would merely prolong his allegedly unlawful detention while providing no meaningful opportunity to obtain the relief sought in this Petition.

The Ninth Circuit has likewise recognized that exhaustion should not be required when constitutional claims are presented or when requiring exhaustion would result in irreparable injury. *Yong v. INS*, 208 F.3d 1116, 1120 (9th Cir. 2000). Every additional day of Petitioner's allegedly unlawful detention constitutes an ongoing deprivation of his fundamental liberty interest that cannot be adequately remedied after the fact. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) ("Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects."). Because this Petition challenges the legality of Petitioner's present detention and seeks relief unavailable through the administrative process, requiring exhaustion would only prolong the very constitutional injury Petitioner seeks to prevent. Exhaustion should therefore be excused.

E. Immediate Release Is the Appropriate Remedy

Federal courts possess broad authority under 28 U.S.C. § 2241 to remedy unlawful executive detention. *Preiser v. Rodriguez*, 411 U.S. 475, 484-85 (1973). Where detention exceeds the Government's statutory authority or violates the Fifth Amendment, habeas corpus provides the appropriate mechanism to restore an individual's liberty. *Zadvydas v. Davis*, 533 U.S. 678, 687-88, 699-700 (2001).

This case closely parallels *Sagrero-Perez v. Scott*, in which a Court in this district considered DHS's attempt to re-detain a noncitizen after prior removal proceedings had been dismissed. The court rejected the Government's request to limit relief to a bond hearing and instead held that the detention itself was unlawful because DHS lacked valid detention authority

and failed to satisfy the requirements of due process. The court therefore granted the writ and ordered the petitioner's immediate release rather than permitting Respondents another opportunity to justify the detention through subsequent proceedings.

The same result is warranted here. This is not a case involving a procedural defect that can be cured by remanding for further administrative proceedings. Rather, Respondents arbitrarily revoked Petitioner's liberty after nearly two years of successful supervision without identifying any material change in circumstances, relied upon an inaccurate administrative record, failed to consider Petitioner's timely TPS re-registration filing and other material aspects of his immigration history, and now attempt to defend that decision through post hoc rationalizations. Those constitutional and statutory defects existed when Petitioner was taken into custody and continue to infect his detention today.

Permitting Respondents to conduct additional administrative proceedings would simply afford them a second opportunity to construct a justification for a detention that was unlawful from its inception. Due process does not permit the Government to detain first and justify later. As *Sagrero-Perez v. Scott* recognized, where DHS acts without lawful detention authority and without the procedural protections required by the Fifth Amendment, the appropriate habeas remedy is release—not a remand to repair constitutional defects after the fact.

Accordingly, Petitioner respectfully requests that this Court grant the Petition for Writ of Habeas Corpus and order his immediate release.

VII. REQUEST FOR RELIEF

Petitioner respectfully requests that this Court:

1. GRANT this Petition for Writ of Habeas Corpus;

2. ORDER Respondents to release Petitioner from custody within 24 hours of the Court's order;
3. In the Alternative, ORDER Petitioner's release under appropriate conditions of supervision including release on an OREC or other reasonable conditions the Court deems appropriate.

VIII. CONCLUSION

This case concerns the arbitrary deprivation of Petitioner's liberty based upon a fundamentally inaccurate understanding of his immigration history. As in *Sagrero-Perez*, Respondents dismissed Petitioner's prior removal proceedings, allowed him to remain at liberty for nearly two additional years, and then re-detained him in new proceedings without identifying any material change in circumstances or a lawful, contemporaneous basis for detention. Instead, Respondents relied upon a materially inaccurate and internally inconsistent administrative record, depriving Petitioner of his liberty without the procedural protections required by the Fifth Amendment. For these reasons, Petitioner respectfully requests that this Court grant the Petition for Writ of Habeas Corpus and order his immediate release.

IX. SIGNATURE AND CERTIFICATION

The undersigned counsel certifies that she represents the Petitioner and that this Petition is filed on his behalf pursuant to 28 U.S.C. § 2241.

Respectfully submitted this 23rd day of July 2026.

/s/Vicky J Currie

Vicky J Currie, WSBA #24192
Attorney for Petitioner

CERTIFICATE OF SERVICE

I, Vicky J Currie, certify that on this 23rd day of July 2026, I served a true and correct copy of the **PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241** upon the following Respondents by electronic service as permitted:

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

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

Required Service on the United States

UNITED STATES ATTORNEY'S OFFICE
USAWAW.ImmigrationHabeasService@usdoj.gov
(Via email)

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 23rd day of July 2026.

/s/Vicky J Currie

Vicky J Currie, WSBA #24192
Attorney for Petitioner