

1 THE HONORABLE TANA LIN  
2 THE HONORABLE GRADY J. LEUPOLD  
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6 UNITED STATES DISTRICT COURT  
7 WESTERN DISTRICT OF WASHINGTON  
8 AT SEATTLE

9 AVEL IVANOVICH REVENKO,

10 Petitioner,

11 v.

12 PAMELA BONDI, Attorney General of  
13 the United States; KRISTI NOEM,  
14 Secretary, United States Department of  
15 Homeland Security; DREW BOSTOCK,  
16 Seattle Field Office Director, United  
States Citizenship and Immigration  
Services; WARDEN of Immigration  
Detention Facility; and the United States  
Immigration and Customs Enforcement,

17 Respondents.

} No. CV 25-549-TL-GJL

} AVEL REVENKO'S RESPONSE TO  
ORDER TO SHOW CAUSE

18 In response to the Court's Order to Show Cause why his petition should not be  
19 dismissed, dkt 4, Avel Ivanovich Revenko respectfully offers the attached application to  
20 proceed in forma pauperis. Exhibit A. If the Court requires a certification from the  
21 detention facility, Mr. Revenko moves the Court for a two-week extension of time to  
22 respond to the Court's Order to Show Cause.

23 **I. BACKGROUND**

24 Mr. Revenko, a stateless immigrant who has been confined at the Northwest ICE  
25 Processing Center since April 11, 2023, petitioned the Court to authorize his release on  
26 conditions pursuant to *Zadvydas v. Davis*, 533 U.S. 678 (2001). Because Mr. Revenko

1 suffers from mental illness that renders him incompetent, Mr. Revenko completed that  
2 petition with the pro bono assistance of counsel that had been appointed by the  
3 immigration court. *See Franco v. Holder*, CV-10-02211 DMG (DTBx) (class action  
4 agreement providing counsel to mentally ill immigration respondents in three states).

5 The Court issued an Order to Show Cause why Mr. Revenko's petition should  
6 not be denied for failure to submit evidence of his financial resources. Working with  
7 *Franco* counsel, Mr. Revenko completed an application to proceed *in forma pauperis*.  
8 Unfortunately, his incompetency means that Mr. Revenko did not comply with the  
9 form's requirement that he obtain a certification confirming the funds in his  
10 commissary account.

11 **II. REQUEST**

12 Mr. Revenko has no income and no funds. He therefore respectfully asks the  
13 Court to accept the attached application to proceed in forma pauperis as is and appoint  
14 undersigned counsel on the sworn contents of the application. Alternatively, he asks the  
15 Court to extend the deadline to obtain the needed certification by two weeks so that  
16 counsel can attempt to get the certification from the Northwest ICE Processing Center.  
17 If the Court extends the deadline, he asks that the Court not extend the noting date of  
18 his petition so that consideration of his request for release is not unduly delayed.

19 DATED this 4th day of April, 2025.

20  
21 Respectfully submitted,

22 s/ *Avel Ivanovich Revenko*  
23 Avel Ivanovich Revenko  
24 (By Gregory Murphy, AFPD)