

DISTRICT JUDGE TANA LIN  
MAGISTRATE JUDGE GRADY J. LEUPOLD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AVEL IVANOVICH REVENKO,

Petitioner,

v.

PAMELA BONDI, *et.al.*,

Respondents.

No. CV25-549 TL-GJL

AVEL REVENKO'S REPLY TO  
RESPONSE TO PETITIONER'S  
OBJECTIONS TO REPORT AND  
RECOMMENDATION

The government's response to Mr. Revenko's objections confirms that the Magistrate Judge relied on material misrepresentations of fact when recommending this Court deny Mr. Revenko's petition for release. Dkt 20. Specifically, Respondents told the Magistrate Judge that, on May 6, 2025, Moldova agreed to issue a travel document to Mr. Revenko. Dkt 9 at 1. ICE now acknowledges that representation was false. In fact, more than three months later, ICE now reports that Moldova has not even agreed that Mr. Revenko is a citizen of that country.<sup>1</sup> See Dkt. 21, ¶ 6.

Respondents' misrepresentations prevented fair consideration of Mr. Revenko's petition before the magistrate judge. As the Court now considers ICE's newest claims about whether unspecified communications make Mr. Revenko's removal

<sup>1</sup> When ICE does not disclose the bases of its opinions, the frequency of these types of misrepresentations is unknowable. However, Judge Cartwright recently noted a similar falsehood in *Nguyen v. Scott*, 25cv1398-TMC. In that case, a deportation officer stated that the petitioner's "case is under current review by the Government of Vietnam." ICE later admitted that it had not even forwarded the request for travel documents to Vietnam.

1 “substantially likely” in the “reasonably foreseeable future,” the Court should not repeat  
2 the mistake of uncritically extending the benefit of the doubt to the deportation officers’  
3 representations and opinions. Rather, the Court should insist that respondents  
4 immediately support their predictions with evidence.

5 The Court also should order Mr. Revenko’s release because, over fifteen months  
6 of post-order detention, largely passed in solitary confinement, “what counts as the  
7 reasonably foreseeable future” has shrunk to the present time. That remains true even if  
8 the Court accepts ICE’s representations that it is trying hard and that Moldova may one  
9 day issue Mr. Revenko a travel document.

10 DATED this 19th day of August, 2025.

11 Respectfully submitted,

12 *s/ Gregory Murphy*  
13 Assistant Federal Public Defender  
14 Attorney for Avel Revenko

15 I certify this document contains 291 words in compliance with the Local Civil Rules.  
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