UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

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JOSE DE JESUS OROZCO AGUILAR,

Plaintiff,

v.

DAVID R. RIVAS, Warden, San Luis Regional Detention Center; KRISTI NOEM, Director U.S. Department of Homeland Security; TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement; and PATRICK DIVVER, Field Office Director of U.S Immigration and Customs Enforcement San Diego Field Office,

Defendants.

Case No: 2:25-CV-03131-KML-ASB

PETITION FOR WRIT OF HABEAS CORPUS

PRELIMINARY STATEMENT

1. Plaintiff challenges the unreasonable, unlawful, and unconstitutional actions taken by the Defendants in relation to his seizure and detention. The Defendants have acted in a manner which violates the Constitution at a minimum, as well as their own policies and regulations regarding the detention of respondents in removal proceedings.

2. Plaintiff is the beneficiary of an approved I-130 Petition for Alien Relative filed prior to April 30, 2001, and has a currently pending Form I-485 Application to Adjust Status pursuant to INA 245(i), which waives his entry without inspection for purposes of adjustment. While this application is pending, USCIS has issued a valid Employment Authorization Document ("EAD") to Plaintiff, which he used to engage in legal employment.

3. Regardless, Plaintiff was caught up in the July 10, 2025 workplace raid by ICE at Glass House Farms in Camarillo, California. Plaintiff is not an employee of Glass House, but was on site that day as a contractor with another company working on the irrigation systems. Despite his valid work authorization, Plaintiff was detained as part of the raid, without a warrant and without individualized reasonable suspicion as required by regulation and mandated by the Constitution.

4. The Defendants, as a matter of law, know that on the true facts, Plaintiff is not subject to detention, and was not subject to being detained in the manner it was

conducted, as he was not a flight risk and did not pose a risk of danger to the community, as required by law.

5. The Defendants' actions in this case are and were arbitrary, have no basis in the law, and violated the Plaintiff's clear Fourth and Fifth Amendment rights.

6. Despite this, on July 10, 2025, the Defendants knowingly violated their own policies and procedures, engaging in conduct that was violative of 8 U.S.C. 1357, 8 C.F.R. 287(a) and (c), and the Fourth Amendment of the United States Constitution, as well as a gross violation of *basic human decency.*

7. Defendants' actions have harmed and continue to harm Plaintiff as their unlawful actions have caused family separation from his Lawful Permanent Resident wife, who is currently being screened for cancer, and his children and grandchildren, and have left the Plaintiff detained without a lawful basis to do so, and without the protections accorded by due process.

8. Plaintiff now seeks review of the unlawful seizure and detention of his person in violation of the INA, regulations, and the Fourth and Fifth Amendments.

CUSTODY

9. Plaintiff is in the physical custody of Defendant Patrick Divver, Field Office Director of the San Diego Office of U.S. Immigration & Customs Enforcement ("ICE"), the Department of Homeland Security ("DHS"), and Defendant David R. Rivas, Warden of the San Luis Regional Detention Center in San Luis, Arizona. At

the time of filing this Petition, the Plaintiff is detained at the San Luis Regional Detention Center in San Luis, Arizona. The San Luis Regional Detention Center contracts with DHS to detain aliens such as the Plaintiff, and is under the jurisdiction of the ICE San Diego Field Office. Plaintiff is under the direct control of Defendants and their agents.

JURISDICTION AND VENUE

10. This action arises under the Constitution of the United States, the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101 et seq. This Court has jurisdiction under 28 U.S.C. § 2241, art. I, § 9, cl. 2 of the United States Constitution ("Suspension Clause") and 28 U.S.C. § 1331, as Petitioner is presently in custody under color of authority of the United States and such custody is in violation of the U.S. Constitution, laws, or treaties of the United States. This Court may grant relief pursuant to 28 U.S.C. § 2241, and the All Writs Act, 28 U.S.C. § 1651.

11. Venue lies in the United States District Court for the District of Arizona, under 28 U.S.C. § 1391, on the following grounds: 1) Defendants are officers or employees of the United States or agencies in the United States who are sued in their official capacity for their acts under the color of legal authority (28 U.S.C. §1391(e)(1)); 2) acts or omissions giving rise to this petition occurred in this judicial district (28 U.S.C. § 1391(e)(2)); and 3) Plaintiff is detained in this judicial district (28 U.S.C. §1391(e)(3).

PARTIES

12. Plaintiff Jose De Jesus OROZCO AGUILAR ("Plaintiff") is a national and citizen of Mexico. Plaintiff is detained by Respondent's allegedly pursuant to 8 U.S.C. § 1226(a), which permits DHS to detain aliens, such as Plaintiff, pending the alien's removal proceedings.

13. Defendant David R. Rivas ("Defendant Rivas") is the warden of the San Luis Regional Detention Center in San Luis, Arizona. He is Plaintiff's immediate custodian and is established in the judicial district of the United States District Court for the District of Arizona. He is sued in his official capacity.

14. Defendant Kristi NOEM ("Defendant Noem") is the Secretary of the Department of Homeland Security ("DHS"), which is responsible for administering and enforcing the nation's immigration laws pursuant to 8 U.S.C. § 1103(a). In this role, she oversees component agencies such as Immigration and Customs Enforcement (ICE). Defendant Noem is sued in her official capacity.

15. Defendant Todd LYONS ("Defendant Lyons") is the Acting Director of U.S. Immigration and Customs Enforcement (ICE), an agency of the United States and a division of DHS. ICE's mission includes the enforcement of criminal and civil laws related to immigration. Among other things, ICE is responsible for the stops, arrests and custody of individuals believed to be in violation of civil immigration law. Defendant Lyons is sued in his official capacity.

16. Defendant Patrick DIVVER ("Defendant Divver") is the Field Office Director for the San Diego Field Office of ICE. In that capacity, Defendant Divver is

responsible for the supervision of personnel within ICE's Enforcement and Removal Operations (ERO) in the geographic area covered by the San Diego Field Office, which includes the San Luis Regional Detention Center. Defendant Divver is sued in his official capacity.

STATEMENT OF FACTS

17. Plaintiff is a native and citizen of Mexico. (See Exhibit A).

18. Plaintiff has resided in the United States since 1999.

19. Plaintiff is the husband of a Lawful Permanent Resident, Celia Flores Larios, who is currently undergoing treatment for possible thyroid cancer. The stress of the events has exacerbated her anxiety, which she already receives medication for.

20. Plaintiff is the beneficiary of an I-130 Petition for Alien Relative filed on his behalf on April 18, 2001, and approved on June 9, 2005.

21. Plaintiff's priority date became current and he filed for adjustment of status on September 20, 2024, pursuant to 245(i), which allows individuals who entered without inspection and were present in the United States on December 21, 2000 for those seeking eligibility through a petition filed prior to April 30, 2001. The application requires an additional $1000 fine for the unlawful entry, in addition to the regular fees. Plaintiff paid his requisite fine.

22. On July 10, 2025, Plaintiff was sent to work on the irrigation system at Glass House Farms location in Camarillo, California by his employer, Art's Labor

Services. Plaintiff's wife also was assigned to Glass House Farms to work in the back offices as a cleaning lady.

23. Around 10:00a.m. on July 10, 2025, ICE executed a raid on Glass House Farms, targeting both the Camarillo and Carpinteria locations.

24. Plaintiff was rounded up with the other employees working that day, and brought to the front room where ICE started to separate them.

25. Upon information and belief, the Plaintiff was included in the raid, even though he was not an employee of Glass House Farms, on account of his appearance and race.

26. The Defendants have engaged in a policy, pattern and practice of stopping and investigating individuals during raids based on nothing but broad profiles, including on the basis of apparent race and ethnicity.

27. The manner in which the Plaintiff was included in the workers gathered in the raid bears no hallmarks of reasonable suspicion. There is indicia that the agents had any specific articulable facts sufficient to justify the seizure of the Plaintiff, or to reject the validity of his work authorization.

28. Plaintiff was rounded up by ICE agents, and it was made clear that he was not permitted to leave. He was subjecting to questioning by the ICE agents, and it was not voluntary for him to refuse to answer questions.

29. Plaintiff presented his work authorization to the ICE agents, to show that he was lawfully working, but the ICE agents rejected his EAD card.

30. Plaintiff was held separately from his wife, who had her own problems with the ICE officers, as the one processing her did not want to believe that her Lawful Permanent Resident card was valid.

31. Although Plaintiff's wife was eventually released in the evening, the Defendants detained Plaintiff and quickly moved him to San Luis, Arizona, away from his family and counsel.

32. Despite the lack of a warrant for his arrest and detention, and his valid work permission, the Defendants detained Plaintiff and have kept him detained without cause.

33. The Plaintiff has no criminal record that requires detention, and has dutifully been attending the scheduled appointments for his pending Form I-485 Application to Adjust Status.

34. The Defendants did not have a warrant for the detention of the Plaintiff, and failed to follow their own procedures for the detention of aliens, including making an individualized flight risk assessment before taking steps to detain the Plaintiff.

35. A stop, even brief, must be supported by reasonable suspicion if "a reasonable person would [believe] that he was not free to leave." *See United States v. Mendenhall*, 466 U.S. 544, 554 (1980).

36. In a typical encounter, and as reported, as occurred here, ICE agents and officers arrived and started to round everyone up suddenly, and in large numbers.

37. The display of force, including the ongoing use of smoke bombs as reported during the raid, is enough to make any person fear for their safety and feel

compelled to comply. Moreover, agents typically position themselves around individuals, aggressively engage them, and bark commands, making it nearly impossible for individuals to decline to answer their questions.

38. Upon information and belief, the individuals at Glass House Farms, including Plaintiff and his wife, were forcibly brought to the packaging area of the facility and separated into groups. No one was permitted to leave, and they were forced to sign a paper if they wanted to get water, and to come back.

39. Congress has made clear that it has a strong preference for immigration arrests to be based on warrants. *See Arizona v. U.S.*, 567 U.S. 387, 407-08 (2012). The Immigration and Nationality Act only gives immigration agents limited authority to conduct warrantless arrests. *See* 8.C.F.R. § 287.8(c)(2)(ii).

40. An immigration officer can make an arrest without a warrant *only* if they have probable cause to believe that the individual "is in the United States in violation of any [immigration] law or regulation," ***and*** the individual "is likely to escape before a warrant can be obtained" for his arrest. INA § 1357(a)(2); 8 C.F.R. § 287.8(c)(2)(ii).

41. Both statute and regulation require that officers establish probable cause of flight risk before conducting a warrantless arrest, which requires a particularized finding of likelihood of escape. *Mountain High Knitting, Inc., v. Reno,* 51 F.3d 216, 218 (9th Cir. 1995).

42. In January, the administration gave ICE field offices an arrest quota of 75 arrests a day, and in late May, increased that quota to 3,000 arrests per day. As offices

attempted to carry out such a mandate, workplace raids increased, such as the raid at Glass House Farms.

43. As a predictable outcome of the imposition of such quotas, along with the dismantling of oversight mechanisms, the predictable and unfortunate result is that Defendants have engaged in a policy and practice of making warrantless arrests without making an individualized flight risk determination as required by law.

44. Such violations of the law are not new to the Defendants. In 2008, ICE agents conducted a workplace raid in Van Nuys, California. While agents were executing a search warrant, they also engaged in detentive stops of workers without individualized reasonable suspicion. The Ninth Circuit ruled that that this was unlawful and invalidating resulting removal proceedings. *See Perez Cruz v. Barr,* 926 F.3d 1128, 1137 (9th Cir. 2019)(citing 8 C.F.R. § 287.8(b)); *See also Chavez Reyes v. Barr*, 803 Fed. Appx. 134 (9th Cir. 2020).

45. On June 10, 2025, the Defendants did not have a warrant to arrest the Plaintiff when they arrived at Glass House Farms.

46. Regardless, the Plaintiff was rounded up with the rest of the workers, his valid Employment Authorization Document was ignored, and he was arrested without an individualized flight risk determination, which would have revealed that Plaintiff has no reason to flee, as he is almost completed with the adjudication of his Lawful Permanent Residence, consistent with the INA.

47. As of today's date, Plaintiff has not been released from detention.

48. There was not and continues to be no basis in the law for the detention of the Plaintiff, in violation of his Fourth Amendment rights against warrantless seizure.

COUNT ONE
Violation of 8 U.S.C. § 1357(a)(2); APA Violations
Warrantless Arrests without Probable Cause of Flight Risk
And Illegal Use of Force
(Against All Defendants)

49. Plaintiff incorporates paragraphs 1 through 48 as if fully stated herein.

50. Defendants illegally detained Plaintiff by arresting him with no legal grounds or probable cause for doing so.

51. Defendants' practices, interpretations of the law, conduct and failure to act violate the APA as the alleged agency action:

a. has caused "[a] person suffering legal wrong because of agency action, or adversely affected or aggrieved by agency action within the meaning of a relevant statute, is entitled to judicial review therefore." 5 U.S.C. § 702;

b. has not afforded "all interested parties an opportunity for: (1) the submission and consideration of facts, arguments…" under U.S.C. 554 § (c)(1);

c. "unlawfully withheld or unreasonably delayed" proper decisions under 5 U.S.C. § 706(1);

d. is "arbitrary, capricious and an abuse of discretion or otherwise not in accordance with law," under 5 U.S.C. § 702(2)(A); and

e. was "without observance of procedures required by law," under 5 U.S.C. § 706(2)(D).

52. 8 U.S.C. § 1357(a)(2) requires that arrests without a warrant be accompanied by "reason to believe" that an individual is "likely to escape before a warrant can be obtained for [their] arrest."

53. Defendants have a policy, pattern and practice of making arrests without any warrant without making an individualized determination of flight risk. They have no mechanism for ensuring compliance with the statutory limits of agents' and officers' warrantless arrest authority and do not provide guidance to agents and officers on how to make an individualized determination of likelihood of escape. Defendants permit agents and officers to make warrantless arrests carte blanche in violation of the law.

54. Defendants' policy, pattern, and/or practice of making warrantless arrests without the required individualized flight risk analysis is "final agency action" that is "in excess of statutory jurisdiction, authority, or limitations" under 8 U.S.C. § 1357(a)(2). 5 U.S.C. §§704, 706(2)(C).

55. Defendants' actions are ultra vires to the requirements of 8 U.S.C. § 1357, as well as their own regulations regarding arrest procedures under 8 C.F.R. § 287.

56. The Defendants had no probable cause to make a warrantless arrest, had no objectively or subjectively reasonable belief that the Plaintiff was going to cause any imminent harm to their person or was going to flee the scene, and made no reasonable efforts to detain Plaintiff beforehand such as issuing a notice asking him to come to the San Diego ICE office for a check in.

57. The Defendants actions were *ultra vires* to the controlling statutes and regulations.

58. The Defendants therefore have violated the APA by taking action that is "not in accordance with the law" as described in 5 U.S.C. § 702(A)(2) and was "without observance of procedures required by law," under 5 U.S.C. § 706(2)(D).

59. As long as the Defendants' unlawful detention is permitted to stand, the Plaintiff will continue to suffer physical, emotional and financial harm.

COUNT TWO
Violation of the Fourth Amendment – Unlawful Seizure
As to All Defendants

60. Plaintiff incorporates paragraphs 1 through 60 as if fully stated herein.

61. Longstanding U.S. Supreme Court precedent establishes that "[t]he Fourth Amendment applies to all seizures of the person, including seizures that involve only a brief detention short of traditional arrest," and those performed by immigration officials. *United States v. Brignoni-Ponce*, 422 U.S. 873, 878 (1975).

62. A seizure occurs under the Fourth Amendment "when there is a governmental termination of freedom of movement through means intentionally applied." *See Scott v. Harris,* 550 U.S. 372, 381 (2007).

63. To determine whether there has been a "show of authority," the Court must use an objective test of whether the officer's words and actions would have conveyed to a reasonable person an order to restrict his movement. *See California v. Hodari D.*, 499 U.S. 621, 628 (1991).

64. "[T]he Fourth Amendment requires that the seizure be 'reasonable.'" *Brignoni-Ponce,* 422 U.S. at 878. "[T]he reasonableness of such seizures depends on a

balance between the public interest and the individual's right to personal security free from arbitrary interference by law officers." *Id.*

65. Where an "excessive force claim arises in the context of an arrest or investigatory stop of a free citizen, it is most properly characterized as one invoking the protections of the Fourth Amendment." *Graham v. Connor*, 490 U.S. 386, 395 (1989).

66. The Fourth Amendment's prohibition against unreasonable seizures "depends not only on when [the seizure] is made, but also on how it is carried out." *Id.*

67. The authority of federal immigration officers is set forth, in relevant part, in 8 U.S.C. § 1357. Under this authority, immigration officials may only make a warrantless arrest if they have "*reason to believe* that the alien so arrested is in the United States in violation of any [immigration] law or regulation *and* is likely to escape before a warrant can be obtained for his arrest. 8 U.S.C. § 1357(a)(2)(emphasis added).

68. Courts have consistently read that the "reason to believe" phrase in § 1357 must be in read in light of constitutional standards, so that there must be probable cause. *See, ie, Brignoni-Ponce*, 422 U.S. at 881-82.

69. The Plaintiff and all witnesses present did not reasonably believe they were permitted to leave Glass House Farms.

70. The Defendants arrived en masse and called for the assistance of local law enforcement as they gathered all workers into a central location, effectuating a seizure of the Plaintiff without regard to regulatory requirements.

71. Under the circumstances, any properly trained officer would have recognized that Plaintiff posed no threat of violence or risk of flight.

72. There were no articulable facts to establish probable cause that Plaintiff would flee apprehension before federal officials could obtain not only a judicial warrant, but even an administrative warrant.

73. The arresting officers lacked probable cause to seize the Plaintiff at the time of the detention.

74. Defendants have a policy, pattern and practice of making arrests without any warrant without marking an individualized determination of flight risk, in a manner that violates the Fourth Amendment rights of Plaintiff and places individuals such as the Plaintiff in apprehension of excessive use of force. They have no mechanism for ensuring compliance with the regulatory limits of agents' and officers' warrantless arrest authority and do not provided guidance to agents and offices on how to make arrests that comport with the requirements of the law and Constitution of the United States.

75. Defendants' actions violated the Fourth Amendment rights of the Plaintiff to be free from unreasonable seizure and free from excessive use of force.

76. As a result of the Defendants' violations of the Plaintiff's Fourth Amendment rights, Plaintiff has suffered, is suffering, and will continue to suffer physical, emotional and financial harm.

COUNT THREE
Violation of Fifth Amendment – Substantive Due Process
As to All Defendants

77. Plaintiff incorporates paragraphs 1 through 76 as if fully stated herein.

78. Non-citizens who are physically present in the United States are guaranteed the protections of the Due Process Clause of the Fifth Amendment. *See Zadvydas v. Davis*, 533 U.S. 678, 693 (2001)("[T]he Due Process Clause applies to all 'persons' within the United States, including aliens, whether their presence here is lawful, unlawful, temporary or permanent.").

79. The Due Process Clause is intended to prevent government officials "from abusing [their] power." *Cnty. of Sacramento v. Lewis,* 523 U.S. 833, 840 (1998)(citations omitted).

80. "[T]he touchstone of due process is protection of the individual against arbitrary action of government" and "the exercise of power without any reasonable justification in the service of a legitimate governmental objective." *Id.* at 845-46.

81. Due process also forbids governmental conduct that "shocks the conscience." *Rochin v. California*, 342 U.S. 165, 172 (1952). Such conduct is "offensive to human dignity." *Id.* at 174.

82. The unlawful seizure and detention of Plaintiff violates his right to substantive due process protected by the Fifth Amendment, as he has been detained without lawful authority, infringing on his fundamental right to liberty and his Fourth Amendment rights to freedom from unreasonable seizure.

83. The Defendants had no reasonable cause to detain the Plaintiff, who has not been arrested, has not evaded arrest, has not been charged with any criminal activity, and who has been engaged in the lawfully permitted process for the adjudication of his immigration application for lawful permanent residence.

84. The continued detention of Plaintiff violates his right to due process, as a continuing violation of his right to freedom from abuse of power, and from unreasonable seizure in violation of the law.

85. As a result of the Defendants' violations of the Plaintiff's Fourth Amendment rights, Plaintiff has suffered, is suffering, and will continue to suffer physical, emotional and financial harm.

COUNT FOUR
Violation of INA 236(a) – Unlawful Detention
Pursuant to the APA
As to All Defendants

86. Plaintiff incorporates paragraphs 1 through 85 as if fully stated herein.

87. Citing to *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), it has been the recent policy that Defendants contend that § 235(b)(2) mandates detention for anyone deemed an "applicant for admission," including interior entrants without admission, and individuals who have been paroled into the United States for more than two years, leaving no room for § 236(a).

88. The position of the Defendants has been that INA § 235(b)(2) requires mandatory detention of all non-citizens present without admission and that immigration judges therefore lack jurisdiction to grant bond.

89. This position improperly conflates § 235 and § 236, renders large portions of § 236 superfluous, and conflicts with the Supreme Court's decision in *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369 (2024), which overruled the *Chevron* doctrine and requires courts to exercise independent judgment rather than deferring to agency interpretations.

90. INA Section 236(a) applies to aliens arrested pursuant to a warrant pending a removal decision.

91. When the Defendants assert, as they do here, that § 235(b) supplants § 236(a) for non-citizens present without admission, then the newly added § 236(c)(1)(E) becomes meaningless because all such individuals would already be mandatorily detained under § 235(b).

92. When conflicting statutes are read together, they must be harmonized to give effect to each provision; courts presume that statutory amendments have real and substantial effect and avoid interpretations that render other provisions meaningless. *Corley v. United States*, 556 U.S. 303 (2009).

93. As noted in *Department of Homeland Security v. Thuraissigiam* , DHS historically treated aliens as applicants for admission only when they were encountered within 14 days of entry and within 100 miles of the border. *Department of Homeland Security v. Thuraissigiam*, 591 U.S. 121 (2020).

94. The Defendant's broad interpretation that everyone present without admission is an "applicant" subject to § 235(b) contradicts this history and lacks textual

support. The more reasonable interpretation is that § 235(b) applies primarily at the border or near the time of entry, while interior arrests fall under § 236.

95. Here, the Plaintiff was present in the United States since 1999. Under any prior interpretation of INA § 235(b), he has been physically present in the United States longer than any time considered, and in particular goes against the clear statutory language of INA § 235(b)(1)(A)(iii)(II) which provides that the provisions of 235(b) apply to an individual "who has not affirmatively shown… that the alien has been physically present in the United States continuously for the 2-year period immediately prior to the date of the determination of inadmissibility."

96. Defining detention under INA section 235(b) as applying to anyone encountered within the United States is ultra vires of the statutory language, let alone historical compliance thereof.

97. The Plaintiff has been physically present in the United States for more than 26 years, well outside the statutory confines of INA Section 235(b).

98. The Plaintiff's detention without bond exceeds the authority of the Defendants to the extent that they claim the detention is mandatory and the Immigration Judge has no jurisdiction to issue bond.

99. The Defendants actions were *ultra vires* to the controlling statutes and regulations.

100. The Defendants therefore have violated the APA by taking action that is "not in accordance with the law" as described in 5 U.S.C. § 702(A)(2) and was "without observance of procedures required by law," under 5 U.S.C. § 706(2)(D).

101. As long as the Defendants' unlawful detention is permitted to stand, the Plaintiff will continue to suffer physical, emotional and financial harm

PRAYER FOR RELIEF

Wherefore, Plaintiff prays that this Court grant the following relief:

(1) Issue a Writ of Habeas Corpus requiring Defendants to release Plaintiff from ICE custody immediately;

(2) Declare that Defendants' detention of Plaintiff is unauthorized by statute and contrary to law and the U.S. Constitution;

(3) If Plaintiffs prevail, they will seek costs under the Equal Access to Justice Act, as amended, 5 U.S.C. § 504 and 28 U.S.C. § 2412. Accordingly, Plaintiffs respectfully request the Court award reasonable costs and attorneys' fees; including, but not limited to, reasonable costs and attorneys' fees available under the Equal Access to Justice Act; and

(4) Grant any other such relief as this Court may deem just and proper

Dated: August 26, 2025

Respectfully submitted,

s/ Julie A. Goldberg

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