**UNITED STATES DISTRICT COURT**
**WESTERN DISTRICT OF WASHINGTON**
**AT SEATTLE**

KENETH MENA TORRES

Petitioner,

v.

CAMILA H. WAMSLEY, Seattle Interim Field Office Director, Enforcement and Removal Operations, United States Immigration and Customs Enforcement (ICE); BRUCE SCOTT, Warden, Northwest ICE Processing Center; KRISTI NOEM, Secretary of Homeland Security; UNITED STATES DEPARTMENT OF HOMELAND SECURITY (DHS); PAMELA BONDI, Attorney General of the United States; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW (EOIR); SIRCE OWEN, Acting Director EOIR; TACOMA IMMIGRATION Court, in their official capacities

Respondents

No.

**PETITON FOR WRIT OF HABEAS CORPUS (IMMIGRATION DETENTION)**

**Agency No. A** [redacted]

## INTRODUCTION

1. Petitioner, Keneth Mena Torres, complains of Respondents listed above as follows.

## PREFATORY STATEMENT

2. Petitioner is a 20-year-old young man who was swept up in a collateral arrest. He was detained at his home in Oakland, California on August 12, 2025, and transferred to the Northwest ICE Processing Center in Tacoma, Washington. Petitioner is the beneficiary of an I-730 asylee/refugee family petition executed on his behalf by his mother, who is granted asylum status. That petition has been explicably pending for over five years (Receipt No. LI[redacted] filed Jan. 27, 2025). The approval of this petition would result in Petitioner obtaining asylee status and mandate termination of his removal proceeding and Petitioner's

release from custody. Petitioner has been in removal proceedings before the San Francisco Immigration Court from since at least June 13, 2017—the day that Court ordered that proceedings be administratively closed. For no apparent reason, DHS has expended its resources to detain this 20-year-old college student with no criminal history

3. Petitioner's detention is unlawful as his arrest exceeds the scope of the judicial warrant and unconstitutional because it violates his core right to liberty under the Due Process clause. Accordingly, to vindicate Petitioner's constitutional rights, this court should grant the instant petition for a writ of habeas corpus.

**JURISDICTION AND VENUE**

4. This case arises under the Immigration and Nationality Act (INA), 8 U.S.C. §§ 1101–1538, and its implementing regulations; the Administrative Procedure Act (APA), 5 U.S.C. §§ 500–596, 701–706; and the U.S. Constitution.
5. This Court has jurisdiction pursuant to 28 U.S.C. § 1331, as this is a civil action arising under the laws of the United States, and under 28 U.S.C. § 2241, as the case challenges Petitioner's unlawful detention.
6. The Court may grant relief pursuant to 28 U.S.C. § 2241 *et seq*; the Declaratory Judgment Act, 28 U.S.C. § 2201; the APA, 5 U.S.C. §§ 702, 706; the All Writs Act, 28 U.S.C. § 1651; Federal Rule of Civil Procedure 65; and the Court's inherent equitable powers.
7. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(e) because Respondents are U.S. agencies and officers of the United States acting in their official capacities or because they reside in this district. In addition, a substantial part of the events or omissions giving rise to the claims occurred in this District as Petitioner is detained in this District, and no real property is involved in this action.
8. Petitioner is confined within the Western District of Washington at the Northwest ICE Processing center in Tacoma, Washington under the color of laws of the United States. This matter is judiciable and ripe even though the Board of Immigration Appeals (BIA) has not yet ruled on the Immigration Judge's decision in this case, as there is no statutory

requirement of administrative exhaustion in the immigration detention context. The Court should waive any prudential exhaustion requirements because of the probability of irreparable harm if his unlawful detention continues without judicial review. The agency's administrative review procedures are inadequate to protect his liberty interest in release.

**REQUIREMENTS OF 28 U.S.C. § 2243**

9. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents "forthwith," unless the petition is not entitled to relief. 28 U.S.C. § 2243. If an OSC is issued, the Court must require respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added)

10. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, according as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia,* 372 U.S. 391, 400 (1963) (emphasis added).

**PARTIES**

11. Petitioner is a 20-year-old citizen and national of Honduras. He has lived in the United States since 2016, when he was 11 or 12 years old. On arrival, he was designated an Unaccompanied Child ("UAC"). His removal proceedings were administratively closed on June 13, 2017, by the San Francisco Immigration Court. On information this is because, as a "UAC," initial jurisdiction over his own asylum application lies with USCIS in a non-adversarial setting. As of today's date, his Form I-730 Petition for Refugee/Asylee Relative remains pending and his removal proceedings are administratively closed yet still pending in San Francisco, and USCIS has not adjudicated his own application for asylum.

12. Petitioner is currently detained at the Northwest ICE Processing Center in Tacoma, Washington. ICE, in while arresting two individuals who lived in a detached apartment located behind Petitioner and his mother's house, detained Petitioner collaterally. Petitioner

is in the custody and direct under the control of Respondents and their agents, within the Western District of Washington.

13. Petitioner has no criminal history, is a student at the College of Alameda, and is employed as a manger by Super Duper Burgers in Emeryville, California.

14. Respondent Cammilla Wamsley is the Interim Field Office Director for ICE Enforcement and Removal Operations (ERO) in Seattle, Washington. As the ERO Seattle Field Office Director, she is Petitioner's immediate custodian, responsible for his detention at NWIPC, and the person with the authority to authorize his detention or release. Defendant Wamsley is sued in her official capacity.

15. Respondent Bruce Scott is the Warden of the NWIPC, oversees the day-to-day functioning of NWIPC, and has immediate physical custody of Plaintiff pursuant to a contract with ICE to detain noncitizens. Mr. Scott is sued in his official capacity as the Warden of a federal detention facility. See *Castaneda Juarez v. Asher*, No. C20-700 JLR-MLP, 2021 WL 1946222, at *3–5 (W.D. Wash. May 14, 2021).

16. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. As Secretary, she oversees the federal agency responsible for implementing and enforcing the INA, including the detention of noncitizens. She is sued in her official capacity.

17. Respondent Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention of noncitizens.

18. Respondent Pamela Bondi is the Attorney General of the United States and head of the U.S. Department of Justice. In that capacity, she oversees EOIR and the immigration court system the agency administers. She is ultimately responsible for the agency's operation. She is sued in her official capacity.

19. Respondent EOIR is a component agency of the Department of Justice responsible for conducting removal and bond hearings of noncitizens. EOIR is comprised of the various immigration courts and an appellate body, the Board of Immigration Appeals. Immigration Judges issue initial decisions in bond hearings, which are then subject to appeal to the BIA.

20. Respondent Sirce Owen is the Director of EOIR and has ultimate responsibility for overseeing the operation of the immigration courts and the Board of Immigration Appeals, including bond hearings. She is sued in her official capacity.

21. The Tacoma Immigration Court is an adjudicatory body within EOIR that possesses jurisdiction to review custody determinations by ICE. As the court within whose territorial jurisdiction Petitioner is detained, the Tacoma court is the appropriate initial (but non-exclusive) venue under agency regulations in which to conduct a custody review. See 8 C.F.R. § 1003.19(c)(1).

22. The San Franciso Immigration Court is also an adjudicatory body within EOIR that possess jurisdiction to review custody determinations by ICE. It is the secondary venue for custody review because, as noted, Petitioner's removal proceeding is pending in that court.

**FACTS AND PROCEDURAL HISTORY**

23. Petitioner is a 20-year-old single male citizen of Honduras. He was born in 2004, and entered the United States on or around August 16, 2016 at or near Hidalgo, Texas. Upon his arrival, he was designated as an Unaccompanied Child (UAC). ICE charged Petitioner with removability from the United States in a notice to appear issued on August 19, 2016. Petitioner filed an I-589 application for asylum with the San Francisco Immigratio Court on March 27, 2017. On May 19, 2017, he filed the same application with USCIS (Receipt No. Z[redacted]).

24. Although USCIS and the Immigration Court may adjudicate asylum applications, generally jurisdiction lies with the Immigration Court where the applicant is in removal proceedings. An exception applies where, as here, the applicant has been determined to be a UAC upon arrival. INA § 208(b)(3)(C), 8 U.S.C. § 1158(b)(3)(C). In those cases, initial jurisdiction lies with the USCIS Asylum Office. *Id.* It is for this reason that removal proceedings for noncitizens in Petitioner's position are administratively closed.

25. The San Francisco Immigration Court did administratively close the Petitioner's removal proceedings on June 13, 2017, finding good cause to grant the motion premised on his

asylum application have been filed with USCIS.

26. The San Francisco Immigration Court granted Petitioner's mother asylum on October 30, 2019. His mother timely filed a Form I-730 Petition for Refugee/Asylee Relative for Petitioner with USCIS on January 27, 2020. *See* 8 CFR § 208.21 (providing for the conferral of asylee status to the spouses and unmarried children under 21-years of age of those granted asylum); INA § 208(b)(3)(B), 8 U.S.C. § 1158(b)(3)(B) ("freezing" the age of the child as of the date the parent's initial I-589 asylum application is pending.)

27. The I-730 filed on Petitioner's behalf remains pending before USCIS as of today's date.

28. Petitioner's own I-589 asylum application remains pending before USCIS as of today's date.

> On or about June 27, 2025, ICE Office of Principal Legal filed a Motion to Restore Matter to the [San Francico Immigration] Court's Active Docket, which asserted the eight-year delay in resolving Mr. Mena's removability was unreasonable. With the zealousness of a convert, ICE argued that: The Immigration Court issued an order administratively closing this case on Monday, June 12, 2017. . . DHS seeks to recalendar this matter in order to resolve the respondent's case on the merits and prevent unreasonable delay in the resolution of the respondent's removal proceedings. *See Matter of W-Y-U-*, 27 I&N Dec. 17, 20 (BIA 2017); 8 C.F.R. § 1003.18(c)(3)(ii)(A), (G). DHS requests the Immigration Court to exercise its discretionary authority in this case in the "important public interest in the finality of immigration proceedings." *W-Y-U-*, 27 I&N Dec. at 20 (citing INS v. Abudu, 485 U.S. 94, 107 (1988)). Exhibit 1.

This action was perhaps the most diligent action taken by the U.S. government to resolve the question of Mr. Mena's removability during the past 8 years. But nevertheless, the I-730 was not addressed at all by ICE or USCIS. The motion to recalendar has been opposed and not granted.

29. On August 12, 2025, DHS executed a judicial warrant at the Petitioner's home. The warrant lists the property to be searched, a vehicle to be searched, and two persons to be searched. Petitioner is not described in said warrant and denies any participation at all in the conduct of the third parties referenced in the search warrants. Mr. Mena was nonetheless arrested and eventually transferred to the Northwest ICE Processing Center where he remains.

30. On August 29, 2025, the Tacoma Associate Chief Immigration Judge Teresa Scala denied

Petitioner's request to redetermine his custody, holding he was an applicant for admission subject to mandatory detention under 8 U.S.C. § 1225(b)(2) and *Matter of Q. Li* 29 I&N Dec. 66 (BIA 2025)("An alien detained under section 235(b) of the INA, 8 U.S.C. § 1225(b), who is released from detention pursuant to a grant of parole under section 212(d)(5)(A) of the INA, 8 U.S.C. § 1182(d)(5)(A) (2018), and whose grant of parole is subsequently terminated, is returned to custody under section 235(b) pending the completion of removal proceedings."). ACIJ Scala incorrectly likened the Petitioner's release from the custody of the Office of Refugee Resettlement to parole akin to parole under INA 212(d)(5)(A).

31. Importantly, ACIJ found that if an appellate body determined she had jurisdiction over the Petitioner, she found him to be not dangerous and releasable under a $5,000 bond.

## LEGAL FRAMEWORK

**Detention under 8 U.S.C. § 1226(a) and § 1225(b)(2)**

32. The INA prescribes three basic forms of detention for noncitizens in removal proceedings. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard non-expedited removal proceedings before an Immigration Judge. See 8 U.S.C. § 1229(a). Individuals in § 1226(a) detention are entitled to a bond hearing at the outset of their detention, see 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, see 8 U.S.C. § 1226(c).
33. Second, the INA provides for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission referred to under § 1225(b)(2).
34. Third, the Act also provides for detention of noncitizens who have been previously ordered removed, including individuals in withholding-only proceedings, See 8 U.S.C. § 1231(a)–(b). This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).
35. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section

1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025). Following enactment of the IIRIRA, EOIR drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225 and that they were instead detained under § 1226(a). See Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

36. In the decades that followed, most people who entered without inspection— unless they were subject to some other detention authority—received bond hearings. That practice was consistent with many more decades of prior practice, in which noncitizens who were not deemed "arriving" were entitled to a custody hearing before an IJ or other hearing officer. See 8 U.S.C. § 1252(a) (1994); see also H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply "restates" the detention authority previously found at § 1252(a)).

37. Immigration Judges have departed from their policy of holding bond hearings for individuals who entered the United States without inspection. Immigration Judges reasoned the mandatory detention provision of § 1225(b)(2)(A) applies to people who enter without inspection because that subparagraph of the statute references "applicant[s] for admission." According to the IJs, the paragraph therefore applies to all individuals who are subject to the grounds of inadmissibility at § 1182, including § 1182(a)(6)(A) and (a)(7). Those two provisions make inadmissible people who entered the United States without inspection or who do not have adequate documentation to allow them to enter or remain in the United States.

38. As a result of it, all detained noncitizens who have entered the United States without inspection and are subject to the grounds of inadmissibility, including long-time U.S. residents, like the Petitioner, are now considered to be in mandatory detention under § 1225(b) and ineligible for bond.

39. This interpretation defies the INA. The plain text of the statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people like Petitioner.

40. Section 1226(a) applies by default to all persons "pending a decision on whether the [noncitizen] is to be removed from the United States." These removal hearings are held under § 1229a, which "decid[e] the inadmissibility or deportability of a[] [noncitizen]."

41. The text of § 1226 also explicitly applies to people charged as being inadmissible, including those who entered without inspection. See 8 U.S.C. § 1226(c)(1)(E). Subparagraph (E)'s reference to such people makes clear that, by default, such people are afforded a bond hearing under subsection (a). Section 1226 therefore leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole.

42. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently entered the United States. The statute's entire framework is premised on inspections at the border of people who are "seeking admission" to the United States. 8 U.S.C. § 1225(b)(2)(A). Accordingly, the mandatory detention provision of § 1225(b)(2) does not apply to people like the Petitioner.

43. The Petitioner entered the United States and was designated a UAC. This designation affords him special protections under the Trafficking Victims Protection Reauthorization Act (TVPRA) as amended in 2008. See H.R. 7311 (110th): William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008. The TVPRA expressly excludes UACs from being subject to expedited removal in favor of processing them into immigration proceedings under INA 240.

44. Immediately upon apprehension, the UAC receives documentation establishing his designation as a UAC and a Notice to Appear. As soon as practicable, the UAC is transferred from the custody of the Department of Homeland Security (DHS) into the custody of the Office for Refugee Resettlement (ORR). ORR will locate a suitable sponsor for the UAC and release the UAC into the custody of that sponsor. Neither ORR nor DHS executes a formal parole document under INA 212(d)(5)(A).

45. Upon information and belief, the DHS followed these procedures upon encountering,

designating, and releasing the Petitioner. No parole document citing to INA 212(d)(5)(A) was provided.

**Delayed Adjudications at the Board of Immigration Appeals**

46. The Board of Immigration Appeals (BIA) appellate process does not offer a meaningful avenue to correct the Tacoma Immigration Court's errors in this case. According to the agency's own data, during FY 2024, the agency's *average* processing time for a bond appeal was 204 days, or nearly seven months (emphasis added). This processing time defies the Due Process Clause.

47. The Supreme Court and the Ninth Circuit have explained that appellate review is a critical component of a constitutional civil detention scheme, including in immigration cases. See, e.g., Schall v. Martin, 467 U.S. 253, 280 (1984); Singh v. Holder, 638 F.3d 1196, 1209 (9th Cir. 2011); Prieto-Romero v. Clark, 534 F.3d 1053, 1065–66 (9th Cir. 2008). The Supreme Court has also made clear that timely appellate review is a key feature of any civil detention scheme. As the Court has explained, "[r]elief [when seeking review of detention] must be speedy if it is to be effective." Stack v. Boyle, 342 U.S. 1, 4 (1951).

48. Most notably, the Court upheld the federal pretrial detention under the Bail Reform Act in part because the statute "provide[s] for immediate appellate review of the detention decision." United States v. Salerno, 481 U.S. 739, 752 (1987). As the Ninth Circuit later elaborated, "[e]ffective review of pretrial detention orders necessarily entails a speedy review in order to prevent unnecessary and lengthy periods of incarceration on the basis of an incorrect magistrate's decision." United States v. Fernandez-Alfonso, 813 F.2d 1571, 1572 (9th Cir. 1987).

49. These principles derive from the federal pretrial context, where, by definition, individuals are subject to federal criminal proceedings. Yet here, where only civil proceedings are at issue, the BIA provides nothing like the speedy review federal district and appellate courts provide of magistrate judge detention decisions.

50. Without timely review, appellate review is meaningless. Indeed, the Supreme Court has

explained that the opportunity to obtain "freedom before conviction permits the unhampered preparation of a defense, and serves to prevent the infliction of punishment prior to conviction." Stack, 342 U.S. Additionally, such detention "may imperil the [detained person's] job, interrupt his source of income, and impair his family relationships." Gerstein v. Pugh, 420 U.S. 103, 114 (1975).

51. During the months it takes the BIA to review a bond appeal, the Petitioner will be forced to defend himself on the merits while in custody, depriving him of a meaningful opportunity to assemble evidence outside of custody, coordinate with his family, or communicate with potential witnesses in other countries.

52. He will also be deprived of time with his family, namely, his lawful permanent resident mother. Petitioner is the main source of financial stability since the untimely death of his father.

**FIRST CAUSE OF ACTION**
**VIOLATION OF 8 U.S.C. § 1226(a)**
**DETENTION UNDER 8 U.S.C. § 1225(b)(2) EXCEEDS STATUTORY AUTHORITY**

53. The foregoing allegations are incorporated as though fully set forth herein.

54. The mandatory detention provision at 8 U.S.C. §1225(b)(2) does not apply to noncitizens residing in the United States who are subject to grounds of inadmissibility because they entered the United States without being admitted. Such noncitizens are detained under § 1226(a), unless they are subject to another detention provision, such as §1225(b)(1), § 1226(c), or § 1231.

55. The Petitioner has no criminal history. ACIJ Scala's order denying the Petitioner's custody redetermination violates the plain statutory language of 8 U.S.C. § 1226(a). The order improperly likens the release from ORR custody to parole under INA 212(d)(A)(5) to impermissibly and illogically hold the Petitioner in custody under 8 U.S.C. § 1225(b)(2).

56. The application to 8 U.S.C. § 1225(b)(2) to the Petitioner violates the INA.

**SECOND CAUSE OF ACTION**

**VIOLATION FOF THE ADMINISTRATIVE PROCEDURE ACT – UNLAWFUL DENIAL OF BOND**

57. The foregoing allegations are incorporated as though fully set forth herein.

58. The mandatory detention provision at 8 U.S.C. §1225(b)(2) does not apply to noncitizens residing in the United States who are subject to grounds of inadmissibility because they entered the United States without being admitted. Such noncitizens are detained under § 1226(a), unless they are subject to another detention provision, such as §1225(b)(1), § 1226(c), or § 1231.

59. The Petitioner has no criminal history. Denying him a bond pursuant to an improper reading of the INA is arbitrary, capricious, and not in accordance with the law. As such, it violates the APA. See Sec. 5 U.S.C. § 706(2).

**THIRD CAUSE OF ACTION**
**VIOLATION OF THE DUE PROCESS CLAUSE OF THE FIFTH AMENDMENT RIGHT TO REVIEW OF CIVIL DETENTION DECISION BY NEUTRAL ARBITER**

60. The foregoing allegations are incorporated as though fully set forth herein.

61. The Due Process Clause guarantees persons in civil detention timely appellate review of the decision to detain. By not adjudicating appeals within sixty days of the filing of a notice of appeal, the BIA does not provide timely review of detention decisions.

62. This failure to provide timely appellate review violates the Due Process Clause of the Fifth Amendment.

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**CONCLUSION AND PRAYER FOR RELIEF**

WHEREFORE, Petitioner requests that this Court grant the following relief:

(1) Assume jurisdiction over this matter;

(2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days

(3) Declare that Petitioner's detention violates the INA, the APA, and the Due Process Clause of the Fifth Amendment.

(4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately

(5) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412, and on any other basis justified under law;

(6) And

(7) Grant such other and further relief that the Court deems just and proper.

Dated: September 2, 2025

Respectfully submitted,

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**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

I represent Petitioner, Keneth Mena Torres, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: September 2, 2025

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