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11 **IN THE UNITED STATES DISTRICT COURT**
12 **DISTRICT OF ARIZONA**

13 Heidy Lorena Gomez Rodriguez,
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Petitioner,

Case No. _____

v.

Fred Figueroa, in his official capacity as
the Facility Administrator of the Eloy
Detention Center;

John Cantu, in his official capacity as
Phoenix Field Office Director for U.S.
Immigration and Customs Enforcement;

Todd Lyons, in his official capacity as
Acting Director of U.S. Customs and
Immigration Enforcement;

Kristi Noem, in her official capacity as
Secretary of the Department of
Homeland Security; and

Pamela Bondi, in her official capacity as
Attorney General of the United States,

Respondents.

INTRODUCTION

1
2 1. On July 19, 2024, Petitioner Heidy Lorena Gomez Rodriguez (“Ms.
3 Gomez” or “Petitioner”), a 39-year-old citizen of Colombia, was granted final protection
4 from deportation in the form of deferral of removal under the Convention Against Torture
5 (“CAT”). *See* ECF No. 1-1 (Immigration Court order). She was released from
6 Immigration and Customs Enforcement (“ICE”) custody on an order of supervision
7 (“OSUP”) three days later, on July 22, 2024. *See* ECF No. 1-2 (OSUP). Over a year later,
8 on or about September 3, 2025, ICE arrested Ms. Gomez without explanation at a routine
9 ICE check-in in Baltimore, eventually transferring her to the Eloy Detention Center
10 (“Eloy”). During her period of supervised release, Ms. Gomez had complied with all legal
11 requirements, including attending scheduled ICE check-ins and not committing any
12 crimes. Ms. Gomez is a single mother of two young children who depend on her. Her re-
13 detention serves no purpose other than to fill ICE’s arbitrary arrest quotas.

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17 2. While ICE did not previously deem Ms. Gomez’s removal to a third country
18 reasonably foreseeable (as evidenced by its decision to release her on an OSUP), when
19 ICE re-detained Ms. Gomez, it initially informed her immigration attorney, Laura
20 Lorenzo, that it intended to remove Ms. Gomez to Mexico and that such removal was
21 imminent. However, when Ms. Lorenzo followed up with ICE several days later to
22 receive more information about the status of Ms. Gomez’s removal to Mexico, a
23 deportation officer told her that ICE was still “on the research phase because Mexico was
24 not accepting her.” Ms. Gomez was subsequently informed by her deportation officer that
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1 Mexico was definitely off the table, as they were not receiving any deportees, and ICE
2 was now contemplating “African countries,” without any specification about which
3 countries they were considering. In other words, ICE is holding Ms. Gomez in detention
4 without any actual plan to imminently deport her, leaving her subject to prolonged
5 detention with no end in sight.
6

7 3. Ms. Gomez is detained pursuant to 8 U.S.C. § 1231, which governs the
8 detention of noncitizens with a final order of removal that has been deferred by an IJ due
9 to a substantial risk of torture in their home country. 8 U.S.C. § 1231(a)(1)(B)(i). Ms.
10 Gomez’s continued detention violates 8 U.S.C. § 1231(a) because her removal is not
11 reasonably foreseeable. *See Zadvydas v. Davis*, 533 U.S. 678 (2001). She cannot be
12 deported to her home country – Colombia – because she was granted CAT protection by
13 an IJ. 8 C.F.R. § 1208.17. DHS waived appeal of this decision, rendering it final on July
14 19, 2024. *See* ECF No. 1-1. To the extent that ICE is pursuing Ms. Gomez’s removal to
15 Mexico or another third country, it has failed to demonstrate that such removal is
16 reasonably foreseeable. There has been no indication that Mexico or another country
17 would accept her, and, in any case, Ms. Gomez would be entitled to notice and the
18 opportunity to seek fear-based relief with respect to any new possible country of removal.
19 Accordingly, Ms. Gomez is entitled to immediate release from ICE custody.
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24 4. Ms. Gomez’s re-detention further violated ICE’s own regulations and her
25 Fifth Amendment due process rights. ICE re-detained her despite her strict compliance
26 with the terms of her OSUP during the time she was out of detention, including attending
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1 her most recent ICE check-in in September 2025. ICE has failed to comply with its own
2 regulations for revocation of release and review of detention, in violation of the
3 Administrative Procedure Act (“APA”) and due process, pursuant to *Accardi v.*
4 *Shaughnessy*, 347 U.S. 260 (1954). Independent of such violations, Ms. Gomez’s re-
5 detention without notice and an opportunity to be heard runs afoul of her Fifth
6 Amendment due process rights under the test in *Mathews v. Eldridge*, 424 U.S. 319, 333
7 (1976). ICE offers no potential end date to detention while Ms. Gomez is detained
8 needlessly and separated from her family. For these procedural violations, Ms. Gomez
9 requests that she be placed back on the terms of supervision with which she had been
10 consistently complying.
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13 JURISDICTION AND VENUE

14
15 5. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331,
16 since this Petition arises under the Constitution and laws of the United States, namely the
17 detention provisions of the Immigration and Nationality Act, 8 U.S.C. § 1231; the
18 accompanying regulations codified at 8 C.F.R. § 241.4, *et seq*; the habeas corpus statute,
19 28 U.S.C. § 2241; and the Due Process Clause of the Fifth Amendment.
20

21
22 6. This Court may grant relief pursuant to the Habeas Corpus Act, 28 U.S.C.
23 § 2241, *et seq.*; the Declaratory Judgment Act, 28 U.S.C. § 2201, *et seq.*; the All Writs
24 Act, 28 U.S.C. § 1651; and the Court’s inherent equitable powers.
25

26 7. Federal district courts have jurisdiction to hear habeas claims by
27 noncitizens challenging the lawfulness of their detention. *Zadvydas*, 533 U.S. at 687.
28

1 8. Federal courts also have federal-question jurisdiction, through the APA, to
2 “hold unlawful and set aside agency action” that is “arbitrary, capricious, an abuse of
3 discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). APA claims
4 are cognizable via habeas. 5 U.S.C. § 703 (providing that judicial review of agency action
5 under the APA may proceed by “any applicable form of legal action, including actions for
6 declaratory judgments or writs of prohibitory or mandatory injunction or habeas corpus”).
7 The APA affords a right of review to a person who is “adversely affected or aggrieved by
8 agency action.” 5 U.S.C. § 702. ICE’s continued detention of Ms. Gomez has adversely
9 and severely affected her liberty.
10

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12 9. Venue is proper in this district pursuant to 28 U.S.C. § 2241(c)(3) and 28
13 U.S.C. § 1391(b)(2) and (e)(1) because at the time of filing Petitioner was detained in the
14 Eloy Detention Center in Eloy, Arizona, within the jurisdiction of this Court; a substantial
15 part of the events and omissions giving rise to the claim occurred in this district;
16 Respondents Cantu and Figueroa reside in this district; and Respondents are officers of
17 the United States acting in their official capacity.
18

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20 10. Exhaustion of administrative remedies is not required because it would be
21 futile.
22

23 **PARTIES**

24 11. Ms. Gomez is a 39-year-old citizen of Colombia who is being detained by
25 Respondents at the Eloy Detention Center in Eloy, Arizona. She was granted deferral of
26 removal under CAT on July 19, 2024, based on her risk of torture in Colombia.
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1 12. Respondent Fred Figueroa is the Facility Administrator of the Eloy
2 Detention Center, which detains individuals suspected of civil immigration violations
3 pursuant to a contract with Immigration and Customs Enforcement (ICE). Respondent
4 Figueroa is the immediate physical custodian responsible for the detention of Petitioner.
5 He is named in his official capacity.
6

7 13. Respondent John Cantu is the director of ICE's Phoenix Field Office, which
8 is responsible for ICE activities in Arizona and is responsible for the Eloy Detention
9 Center. Respondent Cantu's place of business is in the District of Arizona, and he is an
10 immediate legal custodian responsible for Petitioner's detention. He is named in his
11 official capacity.
12

13 14. Respondent Todd Lyons is the Acting Director of ICE. Respondent Lyons
14 is responsible for ICE's policies, practices, and procedures, including those relating to
15 detention of immigrants during the removal process. Respondent Lyons is a legal
16 custodian of Petitioner. He is named in his official capacity.
17

18 15. Respondent Kristi Noem is the Secretary of the U.S. Department of
19 Homeland Security. She is named in her official capacity. In that capacity, Respondent
20 Noem is responsible for the administration of the immigration laws pursuant to 8 U.S.C.
21 § 1103.
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23 16. Respondent Pamela J. Bondi is the Attorney General of the United States.
24 She is named in her official capacity.
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FACTUAL BACKGROUND

Events in Colombia

17. Ms. Gomez was born in Colombia in 1986. She had a difficult childhood: her mother left when she was three, and her father was an abusive alcoholic. She was also sexually abused by an uncle.

18. [REDACTED]

[REDACTED]

20. In 2015, she entered into a civil union with her partner, a man named Fernando, but the relationship quickly deteriorated. Fernando beat her and verbally humiliated her on a regular basis. Ms. Gomez eventually discovered [REDACTED]

[REDACTED]

1 21. At last, Ms. Gomez fled Colombia to save herself and her children and came
2 to the United States. She started a new life, found work as a cleaner, and earned enough
3 money for herself and her children.

4 **Immigration court proceedings**

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6 22. Ms. Gomez filed a Form I-589 with the immigration court on or about April
7 2, 2024, applying for protection under CAT, since she feared torture at the hands of her
8 ex-partner Fernando, [REDACTED]

9
10 [REDACTED] Because of his
11 connections, Ms. Gomez said he could find her anywhere in Colombia, and the police
12 would be unwilling or unable to stop him.

13
14 23. At a merits hearing on July 19, 2024, before IJ Richard Bailey at the
15 Elizabeth, NJ Immigration Court, Ms. Gomez testified in support of her CAT application,
16 and IJ Bailey granted her deferral to removal to Colombia under CAT. Both DHS and Ms.
17 Gomez waived their appeal rights, so the order became final immediately. As a result of
18 the deferral of removal order, Respondents cannot lawfully remove Ms. Gomez to
19 Colombia.
20

21 **Post-order custody and removal**

22
23 24. Three days after her immigration court hearing, Ms. Gomez was released
24 on an order of supervision (“OSUP”). The OSUP required her to appear at regular ICE
25 check-ins and not to commit any crimes or to leave the state of Maryland without first
26 notifying ICE.
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1 25. Ms. Gomez complied with the terms of the OSUP and attended all required
2 check-ins.

3 26. On September 2, 2025, Ms. Gomez received a call from an ICE parole
4 officer telling her to appear at the Baltimore office the following day. When she did so,
5 ICE detained her without explanation and did not allow her to call her attorney. She was
6 ICE detained her without explanation and did not allow her to call her attorney. She was
7 not notified beforehand of ICE's intention to revoke her OSUP, nor was she taken before
8 a neutral arbiter for ICE to demonstrate by clear and convincing evidence that she was a
9 danger or a flight risk. Since that time, she has never been given written notice of the
10 reasons for the revocation of her OSUP or any kind of hearing where she could challenge
11 the revocation.
12

13 27. Initially ICE told Ms. Gomez's immigration attorney that it was planning
14 to remove her imminently to Mexico; however, a few days later ICE retracted that
15 statement, saying Mexico would not accept her, and only vaguely stating that it was
16 looking into possible African countries to send her to. Ms. Gomez believes that as of
17 now, ICE has not identified any particular country to which it might send her, and her
18 removal is not significantly likely in the reasonably foreseeable future.
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21 28. On October 2, 2025, at around 10 p.m., Ms. Gomez and another woman
22 were working at their cleaning jobs in the Eloy detention center when an officer named
23 "Agent Coorner" began yelling at her. When the other woman explained that she and Ms.
24 Gomez had the Unit Chief's authorization to be there cleaning, the officer became more
25 aggressive. Ms. Gomez, seeking to avoid a confrontation, returned to her cell and closed
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1 the door, then went to use the bathroom. The officer began pounding at the door, yelling
2 at Ms. Gomez to open it (though detainees have no ability to do so, since they lock
3 automatically); finally the officer opened the door and stared at Ms. Gomez as she used
4 the bathroom. [REDACTED]

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED] This incident is an example of the
9 sort of tangible harms Ms. Gomez is enduring as a result of Respondents' unlawfully
10 detaining her.
11

12 29. If released, Ms. Gomez plans to return to her home in Maryland, resume
13 work, and be with her family, including her three children, aged 22, 14, and 7.
14

15 LEGAL BACKGROUND

16 **I. Deferral of Removal under the Convention Against Torture**

17 30. To be granted "deferral of removal" under CAT, a noncitizen must show
18 that "it is more likely than not that he or she would be tortured if removed to the proposed
19 country of removal." 8 C.F.R. § 1208.16(c); *see also* 8 C.F.R. § 1208.17(a). When an IJ
20 grants a noncitizen deferral under CAT, the IJ issues a removal order and simultaneously
21 defers removal with respect to the country or countries for which the noncitizen
22 demonstrated a sufficient risk of torture. *See Johnson v. Guzman Chavez*, 594 U.S. 523,
23 531-32 (2021). When an IJ grants a noncitizen CAT protection, both the noncitizen and
24 DHS have the right to appeal that decision to the BIA within 30 days. *See* 8 C.F.R.
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1 § 1003.38(b). If both parties waive appeal or neither party appeals within the 30-day
2 period, the relief granted and the accompanying removal order becomes administratively
3 final. *See id.* § 1241.1.

4
5 31. When a noncitizen has a final CAT grant, they cannot be removed to the
6 country or countries for which they demonstrated a sufficient likelihood of persecution or
7 torture. *See* 8 U.S.C. § 1231(b)(3)(A); 8 C.F.R. § 1208.17(b)(2). While ICE is authorized
8 to remove noncitizens who were granted CAT to alternative countries, *see* 8 U.S.C.
9 § 1231(b); 8 C.F.R. § 1208.16(f), the removal statute specifies restrictive criteria for
10 identifying appropriate countries. Noncitizens can be removed, for instance, to the
11 country “of which the [noncitizen] is a citizen, subject, or national,” the country “in which
12 the [noncitizen] was born,” or the country “in which the [noncitizen] resided”
13 immediately before entering the United States. 8 U.S.C. § 1231(b)(2)(D)-(E).

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16 32. If ICE identifies an appropriate alternative country of removal, the
17 noncitizen must have notice and an opportunity to seek relief from removal to that
18 country. *See Jama v. ICE*, 543 U.S. 335, 348 (2005) (“If [noncitizens] would face
19 persecution or other mistreatment in the country designated under § 1231(b)(2), they have
20 a number of available remedies: asylum, § 1158(b)(1); withholding of removal,
21 § 1231(b)(3)(A); [and] relief under an international agreement prohibiting torture, *see* 8
22 C.F.R. §§ 208.16(c)(4), 208.17(a.)”); *Andriasian v INS*, 180 F.3d 1033, 1041 (9th Cir.
23 1999) (finding that “last minute” designation of alternative country without meaningful
24 opportunity to apply for protection “violate[s] a basic tenet of constitutional due
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1 process”); *Romero v Evans*, 280 F. Supp. 3d 835, 848 n.24 (E.D. Va. 2017) (“DHS could
2 not immediately remove petitioners to a third country, as DHS would first need to give
3 petitioners notice and the opportunity to raise any reasonable fear claims”), *rev’d on other*
4 *grounds, Guzman Chavez*, 594 U.S. 523.
5

6 33. The Government itself has repeatedly acknowledged this right to notice and
7 an opportunity to seek relief, including recently before the U.S. Supreme Court.
8 Transcript of Oral Argument at 33, *Riley v. Bondi*, 23-1270 (2025) (“We would have to
9 give the person notice of the third country and give them the opportunity to raise a
10 reasonable fear of torture or persecution in that third country.”); *see also* Transcript of
11 Oral Argument at 20-21, *Johnson v. Guzman Chavez*, 594 U.S. 523 (2021). Specifically,
12 if ICE were to attempt to remove a noncitizen to a country not designated on their removal
13 order and the noncitizen demonstrated a reasonable fear of torture or persecution in that
14 country, the noncitizen’s removal proceedings would have to be reopened for the IJ to
15 designate the alternative country of removal and for the noncitizen to apply for any fear-
16 based relief in withholding-only proceedings. *See Aden v. Nielsen*, 409 F. Supp. 3d 998,
17 1006-10 (W.D. Wash. 2019); accord 8 U.S.C. § 1231(b)(3)(A); 8 C.F.R. § 1240.10(f); 8
18 C.F.R. § 1240.11(c)(1).
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23 **II. Third-Country Removal Procedures**

24 34. As a result of the aforementioned restrictions and procedures, “only 1.6%
25 of noncitizens granted withholding-only relief were actually removed to an alternative
26 country” in FY 2017. *Guzman Chavez*, 141 S. Ct. at 2295 (Breyer, J., dissenting). And
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1 from FY 2020 to FY 2023, according to publicly available data, ICE removed a total of
2 only *five* noncitizens granted withholding or CAT relief to alternative countries. *Munoz*
3 *Saucedo v. Pittman*, -- F. Supp. 3d --, 2025 WL 1750346 (D.N.J. June 24, 2025), at *7.

4
5 35. When a noncitizen in ICE custody obtains a final grant of CAT, the
6 noncitizen's assigned Deportation Officer ("DO") typically sends requests for removal to
7 a random collection of three or more alternative countries. The request typically consists
8 of an email to the country's embassy, with an attached form entitled ICE Form I-241,
9 "Request for Acceptance of Alien." In nearly every case, the embassies either do not
10 respond or they decline the request. *See, e.g., Zhuzhiashvili v. Carter*, -- F. Supp. 3d --,
11 2025 WL 2837716 (D. Kan. Oct. 7, 2025), at *2 (citing statements from immigration
12 officials showing these "acceptance requests ... are never successful"). Indeed, ICE
13 previously released Ms. Gomez within days of her final grant of CAT protection on July
14 22, 2024, ostensibly because it could not remove her to a third country and did not deem
15 her a danger or flight risk.
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18 19 **III. Detention of Noncitizens Granted CAT Protection**

20 **A. Statutory Framework**

21
22 36. 8 U.S.C. § 1231 governs the detention of noncitizens "during" and
23 "beyond" the "removal period." 8 U.S.C. § 1231(a)(2)-(6). The "removal period" begins
24 once a noncitizen's removal order "becomes administratively final" 8 U.S.C.
25 § 1231(a)(1)(B). The removal period lasts for 90 days, during which ICE "shall remove
26 the [noncitizen] from the United States" and "shall detain the [noncitizen]" as it carries
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1 out the removal. 8 U.S.C. § 1231(a)(1)-(2). If ICE does not remove the noncitizen within
2 the 90-day removal period, the noncitizen “*may* be detained beyond the removal period”
3 if she meets certain criteria, such as being inadmissible or deportable under specified
4 statutory categories. 8 U.S.C. § 1231(a)(6) (emphasis added). Further, the 90-day removal
5 period is extended where the noncitizen interferes with her removal in bad faith. *Id.*
6 § 1231(a)(1)(C). If the removal period is not extended under § 1231(a)(1)(C) or 8 U.S.C.
7 § 1231(a)(6), the noncitizen is released on an OSUP, subject to conditions of release. 8
8 U.S.C. § 1231(a)(3); 8 C.F.R. § 241.5(a)-(b).

11 37. To avoid “indefinite detention” that would raise “serious constitutional
12 concerns,” the Supreme Court in *Zadvydas* construed § 1231 to contain an implicit time
13 limit. 533 U.S. at 682. *Zadvydas* dealt with two noncitizens with final removal orders who
14 could not be removed to their home country or country of citizenship due to bureaucratic
15 and diplomatic barriers. The Court held that § 1231 authorizes detention only for “a period
16 reasonably necessary to bring about the [noncitizen]’s removal from the United States.”
17 *Id.* at 689. Six months of post-removal order detention is considered “presumptively
18 reasonable.” *Id.* at 701. After that point, when the noncitizen “provides good reason to
19 believe that there is no significant likelihood of removal in the reasonably foreseeable
20 future, the Government must respond with evidence sufficient to rebut that showing.” *Id.*

24 38. But the Supreme Court ““did not say that the six-month presumption is
25 irrefutable, and there is nothing inherent in the operation of the presumption ... that
26 requires it to be rebuttable.”” *Munoz-Saucedo*, 2025 WL 1750346, at *7-8 (citing *Cesar*

1 v. *Achim*, 542 F. Supp. 2d 897, 903 (E.D. Wis. 2008)). Rather, “the presumption scheme
2 merely suggests that the burden the detainee must carry within the first six months of
3 post-order detention is a heavier one than after six months has elapsed.” *Id.*; see also *Trinh*
4 v. *Homan*, 466 F. Supp. 3d 1077, 1093 (C.D. Cal. 2020) (“*Zadvydas* established a ‘guide’
5 for approaching detention challenges, not a categorical prohibition on claims challenging
6 detention less than six months.”); *Ali v. DHS*, 451 F. Supp. 3d 703, 708 (S.D. Tex. 2020)
7 (“Whereas the *Zadvydas* Court established a presumption that detention that exceeded six
8 months would be unconstitutional, it did not require a detainee to remain in detention for
9 six months or to prove that the detention was of an indefinite duration before a habeas
10 court could find that the detention is unconstitutional.”).

14 **B. Regulations on Post-Removal Order Detention**

15 39. DHS regulations provide that, by the end of the 90-day removal period, the
16 local ICE field office with jurisdiction over the noncitizen’s detention must conduct a
17 custody review to determine whether the noncitizen should remain detained. See 8 C.F.R.
18 § 241.4(c)(1), (k)(1)(i) (“Prior to the expiration of the removal period, the district director
19 . . . shall conduct a custody review”). ICE is required to provide the noncitizen and, if
20 applicable, their counsel with approximately 30 days’ notice prior to such custody
21 reviews, to allow an opportunity to submit evidence in support of release. *Id.* §
22 241.4(d)(3), (h)(2). The regulations further require that custody decisions be provided to
23 counsel. *Id.* § 241.4(d)(3).
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1 40. The Field Office Director, or their delegate, makes the final custody
2 decision based on recommendations offered by lower-level officers. In making this
3 custody determination, ICE considers several factors, including the availability of travel
4 documents for removal. *Id.* § 241.4(e). The removal period can be extended, and the
5 noncitizen may remain in detention during such extended period if he fails or refuses to
6 make timely application in good faith for travel or other documents necessary for
7 departure. 8 U.S.C. § 1231(a)(1)(C); 8 C.F.R. § 241.5. If the factors in § 241.4 are met,
8 ICE releases the noncitizen on an OSUP. 8 C.F.R. § 241.4(j)(2).
9
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11 41. To comply with *Zadvydas*, DHS issued additional regulations in 2001 that
12 established “special review procedures” to determine whether detained noncitizens with
13 final removal orders are likely to be removed in the reasonably foreseeable future. *See*
14 *Continued Detention of Aliens Subject to Final Orders of Removal*, 66 Fed. Reg. 56,967
15 (Nov. 14, 2001). While 8 C.F.R. § 241.4’s custody review process remained largely intact,
16 subsection (i)(7) was added to include a supplemental review procedure that ICE HQ
17 must initiate when “the [noncitizen] submits, or the record contains, information
18 providing a substantial reason to believe that removal of a detained [noncitizen] is not
19 significantly likely in the reasonably foreseeable future.” *Id.* § 241.4(i)(7).
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23 42. Under this procedure, ICE HQ evaluates the foreseeability of removal by
24 analyzing factors such as the history of ICE’s removal efforts to the countries in question.
25 *See id.* § 241.13(f). If ICE HQ determines that removal is not reasonably foreseeable but
26 nonetheless seeks to continue detention based on “special circumstances,” it must justify
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1 the detention based on narrow grounds such as national security or public health concerns,
2 *id.* § 241.14(b)-(d), or by demonstrating by clear and convincing evidence before an IJ
3 that the noncitizen is “specially dangerous.” *Id.* § 241.14(f).

4
5 **C. Regulations on Revocation of Release**

6 43. ICE may revoke the release of certain noncitizens released on an OSUP
7 under two categories of circumstances. First, a noncitizen’s release can be revoked if they
8 violate the conditions of release. 8 C.F.R. § 241.4(l)(1). Alternately, the Executive
9 Associate Commissioner (or a District Director) can revoke release on conditions and re-
10 detain a noncitizen when (1) the purposes of release have been served, (2) the noncitizen
11 violated any condition of release, (3) “it is appropriate to enforce a removal order or to
12 commence removal proceedings,” or (4) “release would no longer be appropriate” due to
13 the noncitizen’s conduct. 8 C.F.R. § 241.4(l)(2).

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16 44. In either case, the noncitizen is entitled to receive notice of the reasons for
17 revocation and a “prompt” informal interview to respond to the reasons for revocation. If
18 the noncitizen demonstrates that they did not violate the conditions of release, they can
19 be released following the interview. 8 C.F.R. § 241.4(l)(3).

20
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22 **ARGUMENT**

23 45. Ms. Gomez’s continued detention violates § 1231(a)(6) as interpreted by
24 *Zadvydas* because her removal is not reasonably foreseeable given her grant of CAT
25 protection and the unlikelihood of removal to a third country. Under *Zadvydas* and the
26 regulations implementing it, this Court should order her immediate release under
27

1 conditions of supervision.

2 46. Alternatively, ICE's failure to comply with its regulations on re-detention
3 and post-removal-order detention violated Ms. Gomez's Fifth Amendment due process
4 rights and the APA, pursuant to *Accardi*. Ms. Gomez's re-detention without proper
5 procedures violated her due process rights in light of ICE's prior decision to release her
6 for over a year, her compliance while on release, ICE's lack of any compelling reason for
7 her re-detention.
8

9
10 **I. Ms. Gomez's Detention Violates § 1231(a)(6) under *Zadvydas* and She Is**
11 **Entitled to Immediate Release.**

12 47. Ms. Gomez's continued detention violates 8 U.S.C. § 1231(a)(6), as
13 interpreted by the Supreme Court in *Zadvydas*, 533 U.S. 678. Her removal order has been
14 final since July 2024 and her removal is not reasonably foreseeable given her CAT grant
15 to Colombia and the unlikelihood of third-country removal.
16

17 48. 8 U.S.C. § 1231(a), as interpreted by the Supreme Court in *Zadvydas*,
18 authorizes detention only for "a period reasonably necessary to bring about the
19 [noncitizen's] removal from the United States." 533 U.S. at 689. Ms. Gomez cannot be
20 deported to Colombia, the only country of which she is a citizen, because she has a final
21 grant of protection from removal there. Although ICE recently named Mexico as a
22 possible country of removal, it later retracted that and said Mexico was "off the table,"
23 while making vague allusions to "African countries." However, ICE itself has previously
24 recognized the improbability of removing Ms. Gomez, given its decision to release her
25 on an OSUP only three days after her deferral of removal order under CAT. Based on the
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1 data mentioned *supra*, there is less than a 2% chance of deportation to a third country for
2 a noncitizen like Ms. Gomez, who was granted CAT relief. Even if ICE does identify such
3 a country, ICE would be legally obligated to inform Ms. Gomez and her counsel of the
4 identified country. Ms. Gomez would then be given the opportunity to seek fear-based
5 relief from removal to that country, further prolonging her proceedings and detention. *See*
6 *Munoz-Saucedo*, 2025 WL 1750346, at *7 (noting that third country removals have “been
7 historically rare” and that petitioner was entitled to further proceedings to seek fear-based
8 relief, even if a third country for removal were to be found).
9

11 49. Accordingly, Ms. Gomez will not be removed from the United States in the
12 “reasonably foreseeable future” because (1) she cannot be deported to her home country
13 due to her CAT relief grant; (2) ICE has historically managed to remove only a tiny
14 fraction of noncitizens granted withholding or CAT to alternative countries; (3) to her
15 knowledge, ICE has not been able to secure travel documents to a third country currently
16 or during Ms. Gomez’s initial removal period; and (4) removing Ms. Gomez to any
17 alternative country would require additional, lengthy proceedings. As such, Ms. Gomez’s
18 continued detention violates 8 U.S.C. § 1231(a).
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21 50. Although Ms. Gomez has currently been detained a little over one month,
22 it has been over 15 months since her removal order was rendered final. ICE had that entire
23 duration to attempt to find third countries to which to remove Ms. Gomez. While the time
24 periods differ, courts have analyzed the reasonableness of post-removal order detention
25 based on the date of the final removal order triggering the removal period rather than the
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1 date of (re)detention. *See S.F. v. Bostock*, 2025 WL 2841022 (D. Or. Oct. 7, 2025), at *4
2 (noting that “federal courts have refrained from applying the presumption of
3 reasonableness under *Zadvydas* in re-detention cases” and pointing out that “Respondents
4 concede that Petitioner’s detention should be measured cumulatively; it is ‘past the
5 presumptive 180-day threshold of presumptive reasonableness.’”); *Nguyen v. Scott*, 2025
6 WL 2419288 (W.D. Wash. Aug. 21, 2025), at *13 (“[T]he six-month period does not reset
7 when the government detains [a noncitizen] ..., releases him from detention, and then re-
8 detains him again.”); *Dong Van Nguyen v. Hyde*, 2025 WL 1725791 (D. Mass. June 20,
9 2025), at *3; *Escalante v. Noem*, 2025 WL 2206113 (E.D. Tex. Aug. 2, 2025), at *3;
10 *Zavvar v. Scott*, 2025 WL 2592543 (D. Md. Sept. 8, 2025), at *6; *Tadros v. Noem*, 2025
11 WL 1678501 (D N.J. June 13, 2025), at *3 (ruling that for petitioner re-detained years
12 after his final removal order, his “final order of removal [had] triggered the six-month
13 detention period under *Zadyvdas*”).

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18 51. Accordingly, since Ms. Gomez’s order of removal has been final for over
19 15 months, the Government bears the burden of demonstrating that there is a “significant
20 likelihood of removal in the reasonably foreseeable future,” a showing it cannot make.
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22 *See Zadvydas*, 533 U.S. at 701.

23 52. Even if this Court were to conclude based on Ms. Gomez’s six-week post-
24 removal-order detention that she bears the initial burden of showing that her removal is
25 not reasonably foreseeable, she would still prevail. While six months of post-removal
26 order detention is considered “presumptively reasonable,” see *Zadvydas*, 533 U.S. at 701,
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1 Ms. Gomez has rebutted that presumption by demonstrating that her detention is
2 unreasonable due to her grant of CAT protection and the unlikelihood of third-country
3 removal. *See Munoz-Saucedo*, 2025 WL 1750346, at *7-8 (holding that petitioner with
4 final withholding of removal grant had shown that his under six-month detention was
5 unreasonable because his removal was not reasonably foreseeable); *Manago v. Carter*,
6 2025 WL 2841209 (D. Kan. Oct. 7, 2025), at *2 (noncitizen met his burden by showing
7 “he cannot be removed to his home country under the withholding order, officials must
8 find a third country that is willing to accept him, and petitioner has no ties to any other
9 country”). Her case for release is even stronger than the petitioners in *Zadvydas*, who had
10 a final removal order and no immigration relief. *See Zadvydas* at 684, 710.

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14 53. Release is the most common and appropriate remedy for a *Zadvydas*
15 violation. *See, e.g., Munoz-Saucedo*, 2025 WL 1750346, at *9 (ordering release under
16 appropriate conditions where re-detained noncitizen’s removal was not reasonably
17 foreseeable); *Iakubov v. Figueroa*, 2025 WL 2731355 (D. Ariz. Sept. 25, 2025) (ordering
18 release where ICE could not show progress in removal to any third country); *Manago v.*
19 *Carter*, 2025 WL 2841209, at *3 (same); *Zhuzhiashvili*, 2025 WL 2837716, at *3
20 (ordering release of detained Georgian who had withholding of removal to Georgia); *Ali*
21 *v. DHS*, 451 F. Supp. 3d 703, 710 (S.D. Tex. 2020) (ordering release under appropriate
22 conditions pursuant to *Zadvydas*). To order Ms. Gomez’s immediate release, this Court
23 need only determine that her removal is not reasonably foreseeable under *Zadvydas*. It
24 need not analyze whether Ms. Gomez is a danger to the community or a flight risk.
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1 *Zadvydas*, 533 U.S. at 699-700 (“[I]f removal is not reasonably foreseeable, the court
2 should hold continued detention unreasonable and no longer authorized by statute.”);
3 *Munoz-Saucedo*, 2025 WL 1750346, at *8 (“[N]othing supports the argument that danger
4 to the community is a relevant factor to consider in conducting a *Zadvydas* analysis.”).

5
6 54. To the extent that this Court considers the risk of danger or flight, Ms.
7 Gomez does not pose either risk as she has a final grant of relief; familial and community
8 support; demonstrated rehabilitation efforts, including perfect compliance with ICE
9 check-ins; and steady employment. ICE further chose to release her at the beginning of
10 her 90-day removal period in 2024. *See Munoz-Saucedo*, 2025 WL 1750346, at *8
11 (Government’s argument that continued detention was warranted because of petitioner’s
12 endangering welfare of child conviction and dangerousness “lacks credibility considering
13 that ICE voluntarily released Petitioner in 2023 ... when it had no obligation to do so”);
14 *Ulysse v. DHS*, 291 F. Supp. 2d 1318, 1326, n. 13 (M.D. Fla. 2003) (“Obviously
15 Respondents have no concern that Ulysse is a flight risk or a danger to society because
16 they made no effort to remove or detain her sooner.”). In any case, Ms. Gomez’s “release
17 may and should be conditioned on any of the various forms of supervised release that are
18 appropriate in the circumstances.” *Zadvydas*, 533 U.S. at 700.

23 **II. ICE’s Re-Detention and Continued Detention of Ms. Gomez Without** 24 **Sufficient Process Violates the Due Process Clause and the APA.**

25 55. Further, the lack of procedures afforded to Ms. Gomez to challenge her re-
26 detention after fourteen months of freedom and compliance with all the terms of her
27 supervised release violates the Due Process Clause of the Fifth Amendment and the APA.
28

1 **A. ICE’s Failure to Comply with Its Own Regulations Violates the Due**
2 **Process Clause and the APA Pursuant to *Accardi*.**

3 56. First, pursuant to *Accardi v Shaughnessy*, 347 U.S. 260 (1954), ICE’s
4 failure to follow its regulations on revocation of release at 8 C.F.R. § 241.4(l) violates the
5 APA and the Due Process Clause of the Fifth Amendment.

6
7 57. Under the *Accardi* doctrine, which originated in the context of an
8 immigration case and has been developed through subsequent immigration case law,
9 agencies are bound to follow their own policies that affect the fundamental rights of
10 individuals, including self-imposed policies and processes that limit otherwise
11 discretionary decisions. *See Accardi*, 347 U.S. at 267 (holding that BIA must follow its
12 own regulations in its exercise of discretion); *Morton v. Ruiz*, 415 U.S. 199, 235 (1974)
13 (“Where the rights of individuals are affected, it is incumbent upon agencies to follow
14 their own procedures ... even where the internal procedures are possibly more rigorous
15 than otherwise would be required.”).

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18 58. When agencies fail to adhere to their own policies as required by *Accardi*,
19 courts frame the violation as a due process violation or as arbitrary, capricious, and
20 contrary to law under the APA. *See Sameena, Inc. v. United States Air Force*, 147 F.3d
21 1148, 1153 (9th Cir. 1998) (“An agency’s failure to follow its own regulations tends to
22 cause unjust discrimination and deny adequate notice and consequently may result in a
23 violation of an individual’s constitutional right to due process.”) (internal quotations
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1 omitted); *Damus v. Nielsen*, 313 F. Supp. 3d 317, 337 (D.D.C. 2018) (“It is clear,
2 moreover, that [*Accardi*] claims may arise under the APA”).

3 59. Prejudice is generally presumed when an agency violates its own policy.
4 See *Leslie v. Att’y Gen. of U.S.*, 611 F.3d 171, 180 (3d Cir. 2010) (“For the sake of
5 emphasis, we repeat: we hold that when an agency promulgates a regulation protecting
6 fundamental statutory or constitutional rights of parties appearing before it, the agency
7 must comply with that regulation. Failure to comply will merit invalidation of the
8 challenged agency action.”); *Montilla v. INS*, 926 F.2d 162, 167 (2d Cir. 1991) (“We hold
9 that an alien claiming the INS has failed to adhere to its own regulations . . . is not required
10 to make a showing of prejudice before he is entitled to relief. All that need be shown is
11 that the subject regulations were for the alien’s benefit and that the INS failed to adhere
12 to them.”)

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16 60. To remedy an *Accardi* violation, a court may direct the agency to properly
17 apply its policy, or a court may apply the policy itself and order relief consistent with the
18 policy. *Damus v. Nielsen*, 313 F. Supp. 3d 317, 343 (D.D.C. 2018) (“[T]his Court is simply
19 ordering that Defendants do what they already admit is required.”); *Jimenez v. Cronen*,
20 317 F. Supp. 3d 626, 657 (D. Mass. 2018) (scheduling bail hearing to review petitioners’
21 custody under ICE’s standards because “it would be particularly unfair to require that
22 petitioners remain detained . . . while ICE attempts to remedy its failure.”).

23
24
25 61. Here, ICE has violated the requirements of 8 C.F.R. § 241.4(l) for
26 revocation of release in violation of *Accardi*. ICE has not provided Ms. Gomez with any
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1 notice of its revocation of release or any explanation of its basis for revocation. If ICE
2 alleged that she had violated her conditions of release (which Ms. Gomez wholeheartedly
3 contests), it was required to “notif[y] [her] of the reasons for revocation” and “afford[]
4 [her] an initial informal interview promptly” to allow her to contest these reasons. 8 C.F.R.
5 § 241.4(l)(1). She has not received any such notification or interview.
6

7 62. Similarly, to the extent that ICE revoked Ms. Gomez’s release pursuant to
8 8 C.F.R. § 241.4(l)(2), based on a determination of an “Executive Associate
9 Commissioner” or “district director,” Ms. Gomez has received no notice of such
10 determination or a prompt informal interview at which she could contest any such
11 determination. Indeed, she has not received any written notice that her release was in fact
12 revoked, much less one signed by an individual with the authority to do so. *See Ceessay v.*
13 *Kurzdorfer*, 781 F. Supp. 3d 137, 160 (W.D.N.Y. 2025) (noting that the “Executive
14 Associate Commissioner [of] INS is equivalent to the Executive Associate Director [of]
15 ICE.”). Failure to provide notice of revocation that is signed by an individual with
16 authority to do so means that the “release was not lawfully revoked, and . . . [Petitioner]
17 is entitled to release on that basis alone.” *Id.* at 162.
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22 63. Accordingly, this Court should order Ms. Gomez’s release on the same
23 conditions with which she was previously complying. *See Jimenez*, 317 F. Supp. 3d at
24 657 (ordering petitioners’ release because “it would not be appropriate to allow ICE to
25 decide again whether [petitioners’] detention should continue” and “[i]t would be
26 particularly unfair to require that petitioners remain detained for another 30 days while
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1 ICE attempts to remedy its failure to follow its regulations and to provide each of them
2 due process”).

3 **B. ICE’s Re-Detention of Ms. Gomez Without Sufficient Process After**
4 **Fourteen Months of Compliance with Her Order of Supervision**
5 **Independently Violates Her Due Process Rights.**

6 64. Regardless of whether ICE complied with its regulations, the lack of
7 process afforded Ms. Gomez to challenge her re-detention violates her procedural due
8 process rights under the test in *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976); *see also*
9 *Morrissey v. Brewer*, 408 U.S. 471, 480-82 (1972) (holding that revocation of parole
10 involves significant values within the protection of Due Process and termination of that
11 liberty requires, among other protections, written notice of the claimed violations and an
12 informal hearing to ensure that revocation is based on verified facts).

15 65. Here, application of the three-part *Mathews* test shows that Ms. Gomez’s
16 re-detention without any meaningful review is unconstitutional. With regard to the first
17 prong of the test, the private interest that will be affected by the government action, “Ms.
18 Gomez satisfies the first [prong] because the Government has restricted [her] liberty by
19 imprisoning [her], and ‘[f]reedom from imprisonment – from government custody,
20 detention, or other forms of physical restraint – lies at the heart of the liberty [the Due
21 Process Clause] protects.’” *Ledesma Gonzalez v. Bostock*, 2025 WL 2841574 (W.D.
22 Wash. Oct. 7, 2025), at *7 (citing *Zadvydas*, 533 U.S. at 690). “The first factor – the
23 private interest affected by the official action – is [Ms. Gomez’s] liberty interest ... this
24 is a fundamental interest that must be accorded significant weight.” *Id.*

1 66. The second *Mathews* factor, the risk of erroneous deprivation and value of
2 additional safeguards, also heavily favors Ms. Gomez. As discussed above, ICE failed to
3 comply with its already minimal requirements for re-detention under the regulations. Ms.
4 Gomez has received no explanation of the reasons for revocation of her supervised
5 release, no signed notice of revocation, and no opportunity to present evidence in
6 opposition of re-detention. Courts applying the *Mathews* test in analogous cases have
7 found that a hearing is required *before* a person is deprived of her liberty by revocation
8 of an OSUP. *See, e.g., Rodriguez v. Kaiser*, 2025 WL 2855193 (E.D. Cal. Oct. 8, 2025),
9 at *6-7; *Ledesma Gonzalez*, 2025 WL 2841574, at *8-9; *see also Sanchez-Hernandez v.*
10 *Figueroa*, 2:25-cv-2351, Dkt. 33 (D. Ariz. Aug. 5, 2025) (Lanza, J.) (petitioner “ordered
11 released from custody, subject to the conditions of release that applied before the
12 challenged revocation decision”).

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16 67. The fact that Ms. Gomez was released almost immediately after she
17 obtained CAT protection in July 2024 and was out of detention for fourteen months,
18 during which time she did not engage in criminal activity and complied with all OSUP
19 requirements, makes her re-detention particularly problematic. Indeed, there have been
20 no material changes to Ms. Gomez’s situation since ICE previously released her shortly
21 after her grant of CAT protection. *See Munoz-Saucedo*, 2025 WL 1750346, at *8
22 (Government’s argument that petitioner was dangerous “lacks credibility considering that
23 ICE voluntarily released Petitioner in 2023 ... when it had no obligation to do so.”).

1 68. Third, the Government's interest and the administrative burden of
2 additional procedures further favors Ms. Gomez. The procedures set forth in the relevant
3 regulations regarding revocation of release are minimal and impose a negligible burden
4 on the Government. And while the Government may have a legitimate interest in ensuring
5 Ms. Gomez's appearance for any additional third-country removal proceedings and
6 protecting the community from danger, it "has not articulated an interest in the prolonged
7 detention of noncitizens who are neither dangerous nor a risk of flight." *Black v. Decker*,
8 103 F.4th 133, 154 (2d Cir. 2024). Here, where ICE has not articulated any danger or
9 flight risk, and where no neutral adjudicator has determined that Ms. Gomez is either a
10 danger or flight risk, any interest the Government may allege for continuing to detain her
11 is insufficient.
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15 **CLAIMS FOR RELIEF**

16 **COUNT I – VIOLATION OF 8 U.S.C. § 1231(a)(6)**

17 69. Ms. Gomez realleges and incorporates by reference the paragraphs above
18 as though fully set forth herein.
19

20 70. 8 U.S.C. § 1231(a)(6), as interpreted by the Supreme Court in *Zadvydas*,
21 authorizes detention only for "a period reasonably necessary to bring about the alien's
22 removal from the United States." 533 U.S. at 689, 701.
23

24 71. The 90-day removal period and the six-month presumptively reasonable
25 period from *Zadvydas* have long since expired, and Ms. Gomez's removal is still not
26 reasonably foreseeable given her CAT grant and the unlikelihood of third-country
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1 removal. Therefore, her continued detention violates 8 U.S.C. § 1231(a)(6) and requires
2 her immediate release.

3 **COUNT II – VIOLATION OF THE DUE PROCESS CLAUSE OF THE**
4 **FIFTH AMENDMENT**

5 72. Ms. Gomez realleges and incorporates by reference the paragraphs above
6 as though fully set forth herein.

7
8 73. Respondents have violated their own binding regulations at 8 C.F.R.
9 § 241.4(l) regarding the procedures for revocation of release by failing to notify her of
10 the reasons for revocation, provide her with notice of revocation signed by anyone with
11 authority to revoke her release, and provide her with an interview.

12
13 74. The Due Process Clause of the Fifth Amendment forbids the Government
14 from depriving any person of liberty without due process of law. U.S Const. Amend. V.
15 Respondents were required to provide Ms. Gomez with notice and a meaningful
16 opportunity to be heard prior to revoking her OSUP or detaining her, which they failed to
17 do.
18

19
20 **COUNT III – ARBITRARY AND CAPRICIOUS AGENCY ACTION UNDER**
21 **THE ADMINISTRATIVE PROCEDURE ACT, 5 U.S.C. § 706(2)(A)**

22 75. Ms. Gomez realleges and incorporates by reference the paragraphs above as
23 though fully set forth herein.

24
25 76. Courts must “hold unlawful and set aside agency action” that is “arbitrary,
26 capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. §
27 706(2)(A).
28

1 77. As discussed above, Respondents have violated their own binding
2 regulations regarding the procedures for revocation of release. This is arbitrary,
3 capricious, and contrary to law in violation of the APA.

4 **PRAYER FOR RELIEF**

5
6 WHEREFORE, Petitioner respectfully requests that this Court:

- 7 (a) Assume jurisdiction over this matter;
- 8 (b) Grant a writ of habeas corpus pursuant to 28 U.S.C. § 2241;
- 9 (c) Declare that Petitioner's continued detention violates 8 U.S.C. § 1231, as
10 interpreted by the Supreme Court in *Zadvydas*;
- 11 (d) Order her immediate release, subject to the same conditions as before her
12 detention;
- 13 (e) Alternatively, declare that Respondents' failure to follow the procedural
14 requirements of 8 C.F.R. § 241.4 violates the Administrative Procedure Act, 5
15 U.S.C. § 706 and/or the Due Process Clause of the Fifth Amendment;
- 16 (f) Prohibit Respondents from revoking Ms. Gomez's OSUP or re-detaining her in
17 the future without complying with 8 C.F.R. § 241.4;
- 18 (g) Order Respondents to return her to the location at which they arrested her in
19 Baltimore at Respondents' expense;
- 20 (h) Award Petitioner her reasonable attorneys' fees and costs pursuant to the Equal
21 Access to Justice Act or other applicable law;
- 22 (i) Grant any other relief that this Court deems just and proper.
- 23
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1
2 Dated: October 17, 2025

Respectfully submitted,

3 /s/ James D. Jenkins
4 James D. Jenkins* (WA #63234)
5 P.O. Box 6373
6 Richmond, VA 23230
7 Tel.: (804) 873-8528
8 jjenkins@valancourtbooks.com
9 * TO BE ADMITTED PRO HAC VICE

10 /s/ Laura Belous
11 Laura Belous, 028132
12 Florence Immigrant & Refugee Rights Project
13 P.O. Box 86299
14 Tucson, AZ 85754
15 (520) 934-7257
16 lbelous@firrp.org

Counsel for Petitioner

17 **VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF**
18 **PURSUANT TO 28 U.S.C. § 2242**

19 I am submitting this verification on behalf of the Petitioner because I am
20 Petitioner's attorney. I hereby verify that the statements made in the attached Petition for
21 Writ of Habeas Corpus are true and correct to the best of my knowledge.

22 Dated: October 17, 2025

Respectfully submitted,

23 /s/ James D. Jenkins
24 James D. Jenkins

UNITED STATES DISTRICT COURT DISTRICT OF ARIZONA

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the District of Arizona.

The completed cover sheet must be printed directly to PDF and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff(s): **Heidy Lorena Gomez Rodriguez , ;**

Defendant(s): **Fred Figueroa , Warden of Eloy Detention Center; John Cantu , Phoenix Field Office Director for U.S. Immigration and Customs Enforcement; Todd Lyons , Acting Director of U.S. Customs and Immigration Enforcement; Kristi Noem , Secretary of the Department of Homeland Security; Pamela Bondi , Attorney General of the United States;**

County of Residence: Pinal

County of Residence: Pinal

County Where Claim For Relief Arose: Pinal

Plaintiff's Atty(s):

Defendant's Atty(s):

James D, Jenkins ,

,

P.O. Box 6373
Richmond, Virginia 23230
(804) 873-8528

,

Laura Belous ,
The Florence Immigrant & Refugee Rights Project
P.O. Box 86299
Tucson, Arizona 85754
(520) 934-7257

IFP REQUESTED

REMOVAL FROM COUNTY, CASE #

II. Basis of Jurisdiction:

2. U.S. Government Defendant

Plaintiff:- N/A

Defendant:- N/A

IV. Origin : 1. Original Proceeding

V. Nature of Suit: 463 Alien Detainee

VI. Cause of Action: PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241

VII. Requested in Complaint

Class Action: No

Dollar Demand:

Jury Demand: No

VIII. This case is not related to another case.

Signature: s/Laura Belous

Date: 10/17/2025

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, save this form as a PDF and include it as an attachment to your case opening documents.