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DETAINED – ICE – MT. LAUREL, NJ

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SANDRA R. VASQUEZ LUCERO)

**A )
Petitioner,)**

Civil Action No. 1:25-cv-16737

v.)

**PAM BONDI,)
Attorney General of the)
United States of America, and,)**

**KRISTI NOEM,)
Secretary of the Department of)
Homeland Security, (DHS) and,)**

**TODD LYONS,)
Acting Director,)
United States Immigration and)
Customs Enforcement (ICE), and,)**

VERIFIED HABEAS CORPUS PETITION

INTRODUCTION

1. The Petitioner, Sandra Elizabeth Vasquez Lucero, is a 52-year-old female native and citizen of Guatemala. The Petitioner was detained by U.S. Customs and Immigration Enforcement agents this morning outside her home in Woodbury, New Jersey and is currently detained at the ICE Office located at 532 Fellowship Road, Mt. Laurel, New Jersey 08054. She will imminently be transferred out the State of New Jersey, and therefore hereby petitions the U.S. District Court to

declare her detention unlawful and stay her removal outside of the New Jersey jurisdiction.

2. The Petitioner is currently in removal proceedings pending before the Newark Immigration Court and has a master hearing scheduled for February 16, 2028. Nonetheless, Respondents have unlawfully detained her and seek to unlawfully remove her from the U.S. Thus, Petitioner petitions this Court for an order declaring her detention unlawful.

JURISDICTION

3. This action arises under Customary International Law, the United States Constitution and the Immigration and Nationality Act, 8 U.S.C. §§ 1101 *et seq.*. This Court has habeas corpus jurisdiction pursuant to 28 U.S.C. § 2241 *et. seq.*, and Art. I & 9, Clause 2 of the United States Constitution (Suspension Clause). Petitioner is detained at the ICE Facility in Mount Laurel, New Jersey, under the authority of the United States in violation of the Constitution and laws of the United States.

VENUE

4. Venue lies in this Court because Petitioner is detained at the ICE Facility in Mount Laurel, New Jersey.



PARTIES

5. Petitioner is a 52-year-old female native and citizen of Guatemala who has been detained at the ICE Office in Mount Laurel, New Jersey since October 20, 2025. (Exhibit A) She seeks issuance of a writ of habeas corpus.

6. Respondent Pam Bondi is sued in her official capacity as the Attorney General of the United States. In this capacity she is responsible for administering and enforcing the immigration laws pursuant to 8 U.S.C. § 1103 and is the Petitioner's legal custodian.
7. Respondent Kristi Noem is sued in her official capacity as Secretary of the Department of Homeland Security the agency in charge of administering and enforcing the immigration laws in New Jersey and is the Petitioner's legal custodian.
8. Respondent Todd Lyons is sued in his official capacity as the Acting Director of the United States Immigration and Customs Enforcement (ICE) the department within the Department of Homeland Security and in this capacity he is responsible for administering and enforcing the immigration laws in New Jersey and is Petitioner's legal custodian.

FACTS

9. Petitioner, Sandra Rebeca Vasquez Lucero is a 52-year-old female native and citizen of Guatemala who entered the United States without inspection in April 2002 and has not left the United States since that date.
10. A Notice to Appear in Removal Proceedings was issued to the Petitioner and her husband, Erick Navas-Sandoval, on June 7, 2017. (Exhibit B)
11. In Removal Proceedings, the Petitioner applied for cancellation of Removal proceedings based on exceptional extremely unusual hardship to her 10-year-old U.S. citizen daughter. (Exhibit C)

12. Respondent is currently scheduled for a master hearing at Newark Immigration Court on February 16, 2028. (Exhibit D)
13. Respondent was detained this morning by ICE agents as she was leaving for work. She is currently being held at the ICE Mt. Laurel Field Office. ICE agents will not inform Respondent of her next destination.
14. The Petitioner has no criminal record.
15. The Petitioner does not have a final order of removal
16. The Petitioner's removal proceedings are pending before the Newark Immigration Court.
17. 
 However, the Petitioner has been challenging the validity of this warrant for several months, due to the factual impossibility of the alleged crime. (Exhibit E)
18. Petitioner has exhausted all administrative remedies. She has notified ICE that her case is open in Newark, New Jersey and that her detention is premature and unlawful but Respondents nonetheless seek to continue to detain her and remove her from the U.S.
19. Petitioner's removal from the United States cannot be effectuated in the reasonably foreseeable future. Absent judicial review of her custody claim, Petitioner will suffer irreparable injury by being deprived of her physical liberty. She seeks the only avenue of judicial review available to her, habeas review.

COUNT I

20. The allegations contained in paragraphs 1 through 19 above are repeated and realleged as though fully set forth herein. Petitioner's continued detention violates the Due Process clause of the United States Constitution.

COUNT II

21. The allegations contained in paragraphs 1 through 19 are repeated and realleged as though fully set forth herein. Petitioner's detention is not authorized by the Immigration and Nationality Act.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court:

1. Issue a Writ of Habeas Corpus directed to Respondents requiring them to immediate release the Petitioner from custody absent a showing that she has a final order of removal or that circumstances have materially changed in her case;
2. Grant any other and further relief that this Court may deem necessary and proper.

/s/ Kerry W. Hartington
KERRY W. HARTINGTON
Counsel for Plaintiff

Dated: October 20, 2025

VERIFICATION

I, Sandra Rebeca Vasquez Lucero, declare under penalty of perjury in accordance with 28 U.S.C. § 1746 as follows:

1. I am the plaintiff-petitioner in this matter and am personally familiar with the facts of my case;
2. I have read the allegations contained in the foregoing Complaint and to the best of my knowledge, those allegations are true based upon my personal knowledge, information and belief.

Executed on October 20, 2025

s/ Sandra R. Vasquez Lucero
PETITIONER

VERIFICATION BY COUNSEL

I, Kerry Hartington declare under penalty of perjury in accordance with 28 U.S.C.

§ 1746 as follows:

1. I am the attorney for plaintiff-petitioner in this matter and am personally familiar with the facts of her case;
2. I have read the allegations contained in the foregoing Complaint and to the best of my knowledge, those allegations are true based upon my personal knowledge, information and belief.
3. I have also reviewed the documents attached to this habeas petition and confirm that they are true copies of the originals and that all the facts or allegations ascertained therein are true and correct to the best of my knowledge and experience.

Executed on October 20, 2025

s/ Kerry Hartington
KERRY W. HARTINGTON