

**DETAINED**

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THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
SEATTLE, WASHINGTON

SIGAL TZAFIR,

*Petitioner,*

v.

PAMELA BONDI, United States Attorney  
General;  
KRISTI NOEM, Secretary of U.S.  
Department of Homeland Security;  
TODD LYONS, Acting Director, U.S.  
Immigration and Customs Enforcement;  
CAMMILLA WAMSLEY, Field Office  
Director, ICE Seattle Field Office;  
BRUCE SCOTT, Warden, Northwest ICE  
Processing Center;

*Respondents.*

Case No.: 2:25-cv-2070

PETITION FOR WRIT OF HABEAS  
CORPUS PURSUANT TO  
28 U.S.C. § 2241

Agency File Number



**PETITION FOR WRIT OF HABEAS CORPUS**

**INTRODUCTION**

1. The petitioner, Sigal Tzafir is a 27-year-old non-citizen who is currently being held in detention at the Northwest ICE Processing Center (NWIPC) by U.S. Immigration and Citizenship Enforcement (ICE).





1 9. No other petitions, appeals, or motions regarding habeas corpus have been filed  
2 with any other court.

3 10. Venue in the Western District of Washington is appropriate under 28 U.S.C.  
4 § 1391(e)(1) because the petitioner is detained in this judicial district.

5 11. Venue is further appropriate under 28 U.S.C. § 1391(e)(1) because the  
6 Respondents live, work, and/or operate within this judicial district and because the actions which  
7 gave rise to this petition took place in Tacoma, Washington, which falls within this judicial  
8 district.

9  
10 **FACTUAL BACKGROUND**

11 1. Sigal Tzafir is a 27-year-old non-citizen who is currently detained at the  
12 Northwest ICE Processing Center (NWIPC) by U.S. Immigration and Citizenship Enforcement  
13 (ICE). NWIPC is a privately owned and operated immigration detention facility run by the GEO  
14 Group on behalf of ICE.

15 2. Ms. Tzafir was born in 1998 in Israel.

16 3. In 1999, when Ms. Tzafir was one year old, she and her family came to the  
17 United States on a B-2 Visitor's Visa. In 2000, they applied for asylum, withholding of removal,  
18 and relief under the Convention Against Torture. The B-2 visa expired while they waited for  
19 adjudication.

20 4. On April 23, 2004, the immigration court denied asylum and other relief, and it  
21 ordered the family removed to Israel. The family appealed the decision and later tried to reopen,  
22 but all of their efforts failed.

1           5.       By 2009, the family had no more legal options to remain in the United States.  
2 They attempted to return to Israel, but Israel would not issue travel documents. By then, they had  
3 lost their Israeli citizenship and had become stateless.

4           6.       ICE placed Ms. Tzafir on an order of supervision. She has been consistently  
5 checking in with ICE every year for 16 years. She has not had any violations, she has maintained  
6 her work authorization, and she has graduated college.

7           7.       On August 14, 2025, ICE arrived at Ms. Tzafir's house in Portland, Oregon. ICE  
8 told her and her family that her mother, Marina Tzafir, had been detained that morning and that  
9 if she wanted to see her mother again, she had to go promptly to the immigration office.<sup>1</sup> When  
10 Sigal Tzafir and her family arrived at the ICE office a short time later, she was detained.

11           8.       Nothing happened to precipitate the revocation of the order of supervision. ICE  
12 revoked the order of supervision without any notice or cause.

13           9.       The only explanation Ms. Tzafir received was a form saying, "This letter is to  
14 inform you that your order of supervision has been revoked and you will be detained in the  
15 custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has  
16 been made based on a review of your official alien file and a determination that there are  
17 changed circumstances in your case." Exh. 1 (Notice of Revocation of Release).

18           10.      ICE transferred Ms. Tzafir to the Northwest ICE Processing Center in Tacoma  
19 later on the day of her arrest. She has been in detention ever since.

20           11.      Ms. Tzafir is a graduate of California State University (Sacramento) and has a  
21 Bachelor's degree in Philosophy. She works as a legal assistant and married just over a year ago.

22  
23 <sup>1</sup> Ms. Tzafir's mother, Marina Tzafir, was indeed detained and is filing her own petition for  
habeas corpus relief today, under cause 2:25-cv-2067.



**SECOND CLAIM FOR RELIEF**  
**Violation of 8 U.S.C. 1231(a)**

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2  
3 18. The petitioner re-alleges and incorporates by reference the allegations set forth in  
4 each of the preceding paragraphs of this Petition.

5 19. The continued detention violates 8 U.S.C. 1231(a). The 90-day statutory removal  
6 period under 8 U.S.C. 1231(a)(1) began and ended many years ago, and no other provision of 8  
7 U.S.C. 1231(a) justifies detention.

8 20. In addition, the continued detention violates 8 U.S.C. 1231(a) because there is no  
9 significant likelihood of removal in the reasonably foreseeable future. *Zadvydas v. Davis*, 533  
10 U.S. 678, 699 (2001). After more than two months in detention, the respondents have yet to  
11 identify any country to which Ms. Tzafir can be removed.

12  
13 **THIRD CLAIM FOR RELIEF**  
**Violation of Due Process**

14 21. The petitioner re-alleges and incorporates by reference the allegations set forth in  
15 each of the preceding paragraphs of this Petition.

16 22. The continued detention violates the petitioner's right to Due Process under the  
17 Fifth Amendment because the respondents violated their own regulations in revoking the order  
18 of supervision. *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260 (1954).

19 23. The continued detention also violates Due Process because it is not reasonably  
20 related to a legitimate government purpose. *Zadvydas*, 533 U.S. at 690. This detention has no  
21 purpose at all.

**PRAYER FOR RELIEF**

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

- a. Assume jurisdiction over this matter;
- b. Issue a writ of habeas corpus ordering Respondents to immediately release Ms. Tzafir from their custody;
- c. Issue an order preventing Respondents from once again taking Ms. Tzafir into custody unless they have executable travel documents to remove her from the United States and provide her with a notice and a meaningful hearing before detaining her;
- d. Issue an order providing for an award of attorney's fees and costs; and
- e. Grant such other relief as may be just and reasonable.

Dated: October 22, 2025.

/s/ Kelly Vomacka

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