

Chief Judge David G. Estudillo
Magistrate Judge Brian A. Tsuchida

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

SMBAT KHECHUMYAN,

Petitioner,

v.

CAMMILLA WAMSLEY et al.,

Respondents.

Case No. 2:25-CV-02111-DGE-BAT

FEDERAL RESPONDENTS' RETURN

Noted for consideration:
November 12, 2025

I. INTRODUCTION

This Court should deny Petitioner Smbat Khechumyan's request for release from his mandatory immigration detention. United States Immigration and Customs Enforcement ("ICE") lawfully detains Khechumyan pursuant to 8 U.S.C. § 1225(b) pending his administrative removal proceedings. He is subject to mandatory detention because he is an arriving alien. Khechumyan alleges that his continued detention violates his Fifth Amendment due process rights and the Immigration and Nationality Act ("INA").

Khechumyan claims that his detention is unlawful because the medical personnel at the Northwest ICE Processing Center ("NWIPC") have not been sufficiently responsive to his medical needs and are unable to properly treat his seizure disorder. Pet., ¶ 4. He claims that because of this

1 alleged lack of care, Respondents have put him at “risk of imminent serious bodily harm or death”
2 while in custody, and that the only remedy for this is immediate release from detention. *Id.*, ¶ 6.

3 Disregarding the fact that Khechumyan does not allege that he has sought a transfer to a
4 different detention facility, NWIPC has significant ability to provide medical care to the detainees,
5 including Khechumyan whose medical conditions are not considered particularly complex. Since
6 being detained at NWIPC, beginning in October 2024, Khechumyan has been consistently
7 attended to by medical staff. He has a history of rejecting NWIPC’s providers requests to monitor
8 his conditions and has regularly refused to take his medications as prescribed up until July of this
9 year. Despite his inconsistent compliance, with his own medical care, his last recorded suspected
10 seizure occurred almost a year ago now, and his health is considered stable. Thus, the facts do not
11 support Khechumyan’s speculative concerns.
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13 Khechumyan’s constitutional claim lacks merit. His continued detention does not violate
14 substantive due process as the medical care at NWIPC provides for his reasonable safety.
15 Khechumyan cannot establish a substantive due process violation based on the Government’s
16 purported deliberate indifference to his medical needs as ICE proactively is providing him with
17 appropriate, necessary care for his medical conditions. Furthermore, as the Supreme Court has
18 repeatedly recognized, detention is a constitutionally permissible aspect of the Government’s
19 enforcement of the immigration laws and fulfills the legitimate purpose of ensuring that individuals
20 appear for their removal proceedings. *See Jennings v. Rodriguez*, 583 U.S. 281, 285-86 (2018);
21 *Demore v. Kim*, 538 U.S. 510, 523 (2003); *Zadvydas v. Davis*, 533 U.S. 678, 690-91 (2001).
22 Consistent with the requirements of due process, their confinement is thus “reasonably related” to
23 a legitimate government interest. *Bell v. Wolfish*, 441 U.S. 535, 538-39 (1979).
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1 Accordingly, Federal Respondents (or the “Government”) respectfully request that this
2 Court deny Khechumyan’s Petition for Writ of Habeas Corpus. This return is supported by the
3 pleadings and documents on file in this case and the Declarations of Deportation Officer Cristian
4 De Castro (“Castro Decl.”), and NWIPC Clinic Director, Doctor Eddie Wang (“Wang Decl.”).
5 The Government does not seek an evidentiary hearing.

6 **II. FACTUAL BACKGROUND**

7 Khechumyan is a native and citizen of Armenia. Exh. A, De Castro Decl., ¶ 3. On March
8 25, 2015, Khechumyan attempted to enter the United States from Mexico unlawfully, using a
9 fraudulent Permanent Resident Card. *Id.* During this initial encounter, Khechumyan spoke to
10 immigration officials in Spanish. *Id.* Khechumyan expressed a fear of return to Armenia. *Id.* On
11 May 21, 2015, Khechumyan was served with a Notice to Appear, charging him with being an
12 arriving alien, inadmissible under INA § 212(a)(7)(A)(i)(I), as an applicant for admission without
13 a valid entry document. *Id.* On May 29, 2015, ERO paroled him into the United States under INA
14 § 212(d)(5) to await his hearing before the Immigration Court. *Id.*, ¶ 4

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17 On February 26, 2016, Khechumyan appeared before the Immigration Judge and indicated
18 that he spoke Armenian, Russian and Spanish. He chose to proceed with him immigration court
19 hearings in Spanish. *Id.*, ¶ 5. On June 8, 2018, Khechumyan appeared before the Immigration
20 Judge again, and testified in support of his applications for asylum, withholding of removal, and
21 protection under the Convention Against Torture. *Id.*, ¶ 7. However, as he was awaiting a decision
22 on those applications, Khechumyan was indicted in the United States District Court, Central
23 District of California for several counts of Bank Fraud and Aggravated Identity theft and was
24 arrested. *Id.*, ¶ 8.
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1 On September 30, 2020, the Immigration Judge found Khechumyan not credible in his
2 asylum claim, denied all his applications for relief, and ordered him removed to Armenia. *Id.*, ¶ 9.
3 On October 26, 2020, Khechumyan appealed that decision to the Board of Immigration Appeals;
4 that appeal remains pending. *Id.*, ¶ 10.

5 On July 12, 2022, Khechumyan pleaded guilty to one count one count of Conspiracy to
6 Commit Bank Fraud, in violation of 18 U.S.C. §§ 1349 and 1344(2), and one count of Aggravated
7 Identity Theft, in violation 18 U.S.C. § 1028(a)(1). *Id.*, ¶ 11. He was sentenced to forty-eight
8 months confinement in the Bureau of Prisons (“BOP”) for these crimes. *Id.* Upon release from
9 BOP custody, Khechumyan was transferred to ICE custody at NWIPC in Tacoma, Washington,
10 where he remains mandatorily detained while his proceedings remain pending, under INA §§
11 235(b) and 236(c). *Id.*, ¶ 12. On October 24, 2024, Khechumyan filed a motion to reopen and
12 remand his prior proceedings with the Board of Immigration Appeals, which remains pending. *Id.*,
13 ¶ 13.
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15 ICE Health Service Corps (“IHSC”) provides medical, dental and mental health care at the
16 NWIPC. Exh. B, Wang Decl., ¶ 5. The NWIPC is a Level 4 facility, meaning it can provide a
17 higher level of medical care. *Id.* Upon his arrival at NWIPC, Khechumyan reported a history of
18 Seizure Disorder, Hypertension (or high blood pressure), and Hyperlipidemia (high cholesterol).
19 *Id.*, ¶ 6. These conditions are commonly encountered by the medical team of at NWIPC, and ones
20 that they are adept in treating. *Id.* While Khechumyan’s medical conditions are not particularly
21 complex, NWIPC can manage patients with complex medical issues and collaborates with multiple
22 nearby emergency departments that can assist in assessing critical patients and hospitalize unstable
23 patients. *Id.*, ¶ 5. NWIPC also has collaborative agreements with local specialty services that
24 covers all aspects of medical specialties. *Id.*
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1 Since his arrival at NWIPC, IHSC has been treating Khechumyan's various medical
2 conditions, including prescribing him medications, scheduling him regular follow-up
3 appointments, monitoring his blood pressure, and requesting lab work. *See id.*, ¶¶ 7-20. On
4 November 12, 2024, Khechumyan was seen by a provider due to him self-reporting that he had
5 experienced a seizure thirty minutes prior. *Id.*, ¶ 9. At the appointment, Khechumyan reported that
6 his symptoms had resolved, and his vital signs were assessed as normal. *Id.* Despite the self-
7 reported seizure incident, Khechumyan declined to take his medications, including his seizure
8 medication, that evening, and on the following day. *Id.*, ¶ 10. His medical noncompliance
9 continued up until about three months ago. For instance, Khechumyan was not accepting of much
10 of the medical treatment offered to him –he frequently declined blood draws, failed to attend
11 scheduled medical appointments, and refused to take his medications. *See id.*, ¶¶ 10-18.

13 However, since July 2025, Khechumyan agreed to comply with IHSC's medical treatment
14 plan, has attended scheduled medical appointments, and is taking his medication as directed. *Id.*,
15 ¶ 18. He effectively communicates with IHSC's medical providers in Spanish, English, Russian
16 and Armenian during his appointments. *Id.*, ¶¶ 21-24.

18 IHSC has and will continue to provide Khechumyan with appropriate, consistent and
19 necessary medical care while he is detained at NWIPC. His current medical conditions are stable,
20 he has not had any breakthrough seizures since the one self-reported in November of last year, and
21 there has been medical need for him to be referred to any outside specialists. *Id.*, ¶ 25.

23 **III. LEGAL STANDARD**

24 It is axiomatic that “[t]he district courts of the United States . . . are courts of limited
25 jurisdiction. They possess only that power authorized by Constitution and statute.” *Exxon Mobil*
26 *Corp. v. Allopath Servs., Inc.*, 545 U.S. 546, 552 (2005) (internal quotations omitted). “[T]he scope
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1 of habeas has been tightly regulated by statute, from the Judiciary Act of 1789 to the present day.”
2 *Dep’t of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 125 n.20 (2020). Title 28 U.S.C. § 2241
3 provides district courts with jurisdiction to hear federal habeas petitions.

4 To warrant a grant of habeas corpus, the burden is on the petitioner to prove that his or her
5 custody is in violation of the Constitution, laws, or treaties of the United States. *See* 28 U.S.C. §
6 2241(c)(3); *Lambert v. Blodgett*, 393 F.3d 943, 969 n.16 (9th Cir. 2004).

7 IV. ARGUMENT

8 Khechumyan’s detention is statutorily mandated, and his detention, including the medical
9 care offered, comports with due process. He is not entitled to release. Accordingly, this Court
10 should deny the Petition.

11 A. ICE lawfully detains Khechumyan pursuant to 8 U.S.C. §§ 1225(b)

12 Khechumyan does not challenge the statutory basis for his mandatory detention.
13 Khechumyan’s detention is constitutional and statutorily mandated pursuant to 8 U.S.C. § 1225(b)
14 and alternatively, 8 U.S.C. § 1226(c). *Demore v. Kim*, 538 U.S. at 530 (“Detention during removal
15 proceedings is a constitutionally permissible part of that process.”).

16 The inspection, detention, and removal of aliens who have not been admitted is governed
17 by 8 U.S.C. § 1225. Section 1225(b) authorizes the detention of arriving aliens. “Arriving alien,”
18 in relevant part, is defined as “an applicant for admission coming or attempting to come into the
19 United States at a port-of-entry.” 8 C.F.R. § 1001.1(q). Arriving aliens are ineligible for bond
20 under 8 C.F.R. § 1003.19(h)(2)(i)(B); 8 U.S.C. § 1225(b)(1)(A). Khechumyan presented himself
21 for inspection and admission at a port of entry and was paroled into the United States under 8
22 U.S.C. § 1182(d)(5) in 2015. Accordingly, he is considered an arriving alien and remains so today.
23 8 C.F.R. § 1001.1(q); *Matter of Oseiwusu*, 22 I&N Dec. 19, 20 (BIA 1998). Khechumyan is
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1 therefore mandatorily detained without the possibility for bond. *See id.*; *see also* 8 C.F.R. §
2 1003.19(h)(2)(i)(B); 8 U.S.C. § 1225(b)(1)(A).

3 **B. Khechumyan's conditions of confinement claim is not properly brought pursuant to**
4 **habeas.**

5 This Court should not consider the conditions of confinement as part of a 28 U.S.C. § 2241
6 habeas corpus petition. *See Pinson v. Carvajal*, 69 F.4th 1059 (9th Cir. 2023). Khechumyan alleges
7 that his medical care at the NWIPC violates his right to substantive due process guaranteed by the
8 Fifth Amendment. *See Pet.*, ¶¶ 28-38. Although the relief he seeks is release from detention, his
9 claim is squarely focused on alleged constitutional violations caused by the adequacy of his
10 medical treatment at NWIPC. To be clear, the Petition asserts that NWIPC “unable” to provide
11 adequate medical care to Khechumyan; it does not allege that detention *at any facility* would be
12 unlawful or unconstitutional. As such, this is a challenge to the conditions of Khechumyan's
13 confinement at the NWIPC and not a direct challenge to the legality or duration of his confinement.
14 Thus, “[t]he appropriate remedy for such constitutional violations, if proven, would be a judicially
15 mandated change in conditions and/or an award of damages, but not release from confinement.”
16 *Crawford v. Bell*, 599 F.2d 890, 891 (9th Cir. 1979); *see also Badea v. Cox*, 931 F.2d 573, 574
17 (9th Cir. 1991) (challenges to conditions of confinement are pursued in a civil rights action).
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19 While courts in this District have adjudicated conditions of confinement claims related to
20 the COVID-19 pandemic, those cases were decided under unique circumstances not present here.
21 *See, e.g., Dawson v. Asher*, No. 20-cv-0409, 2020 WL 1704324, at *8-9 (W.D. Wash. Apr. 8,
22 2020) (explaining the circumstances under which the Court undertook consideration of COVID-
23 19-related conditions of confinement claims in petitions brought under 28 U.S.C. § 2241).
24 Accordingly, this Court should decline to extend such consideration to the claims in this case.
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1 **C. The conditions of Khechumyan’s confinement are constitutional.**

2 *1. Khechumyan cannot demonstrate that he has been denied adequate medical care at*
3 *NWIPC.*

4 Due process requires the government to assume some responsibility for civil detainees’
5 safety and well-being, such as “food, clothing, shelter, medical care, and reasonable safety.”
6 *DeShaney v. Winnebago Cty. Dep’t of Soc. Servs.*, 489 U.S. 189, 200 (1989). To demonstrate a
7 due process violation, a petitioner must show:

- 8 (i) The defendant made an intentional decision with respect to the conditions
9 under which the plaintiff was confined;
- 10 (ii) Those conditions put the plaintiff at substantial risk of suffering serious
11 harm;
- 12 (iii) The defendant did not take reasonable available measures to abate that risk,
13 even though a reasonable officer in the circumstances would have
14 appreciated the high degree of risk involved – making the consequences of
15 the defendant’s conduct obvious; and
- 16 (iv) By not taking such measure, the defendant caused the plaintiff’s injuries.

17 *Castro v. Cty. of L.A.*, 833 F.3d 1060, 1071 (9th Cir. 2016) (en banc).

18 Khechumyan cannot meet this standard. First, Khechumyan cannot show that the medical
19 care at NWIPC puts him at a substantial risk of suffering serious harm. Federal Respondents do
20 not dispute that Khechumyan has various medical conditions, including seizure disorder. Pet.,
21 ¶ 23; Wang Decl., ¶ 6. However, Khechumyan’s conditions are ones that are commonly
22 encountered by the IHSC, and the medical staff at NWIPC is entirely capable of providing him
23 treatment for those conditions. Wang Decl., ¶ 6.

24 NWIPC is in a large urban center in proximity to a number of hospitals and specialists.
25 Medical, dental, and mental health care at the NWIPC is provided by IHSC. *Id.*, ¶ 5. IHSC
26 comprises a multidisciplinary workforce that consists of U.S. Public Health Service
27 Commissioned Corps officers, federal civil servants, and contract health professionals. *Id.* The

1 medical clinic at the NWIPC currently includes physicians, Family Medicine, Emergency
2 Medicine, Physician Aids, Advanced Nurse Practitioners, nurses, records technicians, psychiatrists
3 and behavioral health specialists, dentists and dental technicians. *Id.* The medical clinic contracts
4 outside radiology that will conduct portable X-ray orders upon request. *Id.* The medical clinic also
5 has its own pharmacy, two pharmacists as well as pharmacy technicians. *Id.* For any treatment or
6 issue not treated at NWIPC, there are collaborative agreements with local specialty services and
7 numerous hospitals for treatment of critical patients. *Id.* Accordingly, Khechumyan cannot show
8 the substantial medical care available to him places him at substantial risk of sustaining serious
9 harm.
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11 Second, the medical care offered to Khechumyan constitutes objectively reasonable
12 measures to abate the risk of serious physical harm. The Ninth Circuit applies an objectively
13 unreasonable test to failure-to-protect claims brought under the Due Process Clause. *Castro*, 833
14 F.3d at 1071. “[T]he defendant’s conduct must be objectively unreasonable, a test that will
15 necessarily ‘turn on the facts and circumstances of each particular case.’” *Id.* (quoting *Kingsley v.*
16 *Hendrickson*, 576 U.S. 389, 396 (2015) (alterations and internal quotation marks omitted)).
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18 Litigants claiming deliberate indifference must establish that government action is
19 “objectively unreasonable” – a standard akin to reckless disregard. *Gordon v. Cty. Of Orange*,
20 888 F.3d 1118, 1125 (9th Cir. 2018). “[T]he Constitution does not require that detention facilities
21 reduce the risk of harm to zero.” *C.G.B. v. Wolf*, 464 F. Supp. 3d 174, 212 (D.D.C. 2020) (quoting
22 *Benavides v. Gartland*, No. 20-cv-46, 2020 WL 1914916, at *5 (S.D. Ga. Apr. 18, 2020) & citing
23 *Dawson v. Asher*, No. 20-cv-0409, 2020 WL 1704324, at *12 (W.D. Wash. Apr. 8, 2020)). Neither
24 general allegations of negligence nor a petitioner’s general disagreement with treatment received
25 is enough to show deliberate indifference. *See Estelle v. Gamble*, 429 U.S. 97, 105-06 (1976).
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1 Rather, that standard can be met “only when the decision by the [medical] professional is such a
2 substantial departure from accepted professional judgment, practice, or standards as to demonstrate
3 that the person responsible actually did not base the decision on such a judgment.” *Youngberg v.*
4 *Romeo*, 457 U.S. 307, 321-22 (1982).

5 IHSC is providing Khechumyan with appropriate, necessary medical care during his time
6 at NWIPC. *See generally* Wang Decl. Medical care at the NWIPC is generally governed by the
7 2011 Performance-Based National Detention Standards (“PBNDS”) concerning medical care. *Id.*,
8 ¶ 5; PBDNS, *available at* <https://www.ice.gov/detain/detention-management/2011> (last visited
9 Mar. 12, 2025). Khechumyan has been offered medical care consistent with the PBNDS.

11 As alleged in the Petition, Khechumyan’s primary medical issue of concern is his seizure
12 disorder. Wang Decl., ¶ 6; Pet., ¶ 23. IHSC has ensured Khechumyan the availability of necessary
13 medication to manage this condition. PBNDS, Sec. 4.3(II)(20) (“Prescriptions and medications
14 shall be ordered, dispensed and administered in a timely manner and as prescribed by a licensed
15 health care professional.”); Wang Decl., ¶ 7. If an emergency occurs, NWIPC is near various
16 hospitals. *Id.*, ¶ 5. If a specialty service is needed, which has not been the case thus far, IHSC will
17 refer Khechumyan to a specialist. PBNDS, Sec. 4.3(II)(6) (“A detainee who is determined to
18 require health care beyond facility resources shall be transferred in a timely manner to an
19 appropriate facility.”); *see also* Wang Decl., ¶¶ 5, 25. IHSC is also treating Khechumyan’s other
20 medical issues. Wang Decl., ¶¶ 7-25.

22 Notably, Khechumyan has not had a seizure while at NWIPC since his self-reported seizure
23 that occurred nearly a year ago. Wang Decl., ¶ 25. This is despite the fact that Khechumyan did
24 not comply with his treatment plan for a significant period of time. From November 2025 to July
25 2025, Khechumyan repeatedly refused lab testing, did not attend scheduled medical appointments,
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1 and would not take his medication, including his seizure medication. *Id.*, ¶¶ 10-17. Because of this,
2 IHSC counseled Khechumyan numerous times about his medication compliance. *Id.*, ¶¶ 11, 14,
3 16. It was only three months ago that Khechumyan promised providers that he would take his
4 medication as prescribed. *Id.*, ¶ 18. Since then, he has consistently taken his medications and
5 attended medical appointments as scheduled. *Id.*, ¶¶ 19-20.

6 Khechumyan also cannot demonstrate that his medical care at NWIPC places him in
7 sufficiently imminent danger. “To satisfy the fourth element, a plaintiff need only prove a
8 ‘sufficiently imminent danger[],’ because a ‘remedy for unsafe conditions need not await a tragic
9 event.’” *Roman v. Wolf*, 977 F.3d 935, 943 (9th Cir. 2020) (quoting *Helling v. McKinney*, 509 U.S.
10 25, 33–34 (1993)). Currently, Khechumyan’s blood pressure and cholesterol are considered
11 normal, and again, Khechumyan has not had a seizure for almost a year. *Id.*, ¶ 25. Without any
12 showing that he is in sufficient imminent danger due to inadequate medical care at NWIPC, his
13 due process claims concerning the lawfulness of his detention due to alleged inadequate medical
14 care should be dismissed.
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16 Accordingly, Khechumyan’s conditions of confinement do not violate his Fifth
17 Amendment substantive due process right to reasonable safety.
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19 *2. Khechumyan cannot demonstrate punitive conditions of confinement.*

20 Khechumyan’s detention is not punitive because it is reasonably related to legitimate
21 governmental objectives. When evaluating the constitutionality of civil detention conditions under
22 the Fifth Amendment, a district court must determine whether those conditions “amount to
23 punishment of the detainee.” *Bell*, 441 U.S. at 535. A petitioner may show punishment through an
24 express intent to punish or a condition that is not “reasonably related to a legitimate governmental
25 objective.” *Bell*, 441 U.S. at 539; *see also Kingsley*, 576 U.S. at 398 (noting that “a pretrial detainee
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1 can prevail by providing only objective evidence that the challenged governmental action is not
2 rationally related to a legitimate governmental objective or that it is excessive in relation to that
3 purpose”). “A restriction is punitive where it is intended to punish, or where it is ‘excessive in
4 relation to [its] non-punitive purpose.’” *See Jones v. Blanas*, 393 F.3d 918, 933-34 (9th Cir. 2004).

5 Khechumyan presents no evidence that ICE or IHSC’s medical treatment constitutes an
6 express intent to punish him. Furthermore, the Supreme Court has recognized “a legitimate
7 government interest in ensuring noncitizens appear for their removal or deportation proceedings
8 and protecting the community from harm.” *Bryan v. ICE Field Off. Dir.*, No. 21-cv-00154, 2021
9 WL 4556148, at *4 (W.D. Wash. June 14, 2021), *report and recommendation adopted*, 2021 WL
10 4552442 (W.D. Wash. Oct. 5, 2021) (citing *Jennings*, 583 U.S. at 285-88, *Demore*, 538 U.S. at
11 520–22, *Zadvydas v. Davis*, 533 U.S. 678, 690–91 (2001)). As the Supreme Court has emphasized,
12 “[t]he wide range of ‘judgment calls’ that meet constitutional and statutory requirements [for
13 federal detention] are confided to officials outside of the Judicial Branch of Government.” *Bell*,
14 441 U.S. at 562. The Constitution thus leaves the Government latitude in determining how it may
15 achieve its legitimate interest in executing the immigration laws. In evaluating those
16 determinations, courts must be careful to impose only what the Constitution requires – not “a
17 court’s idea of how best to operate a detention facility.” *Id.*, at 539.

18 Khechumyan’s detention is justified. He is an arriving alien, who was found not credible
19 in his application for asylum, and during the pendency of his removal proceedings, was convicted
20 of serious fraud crimes. De Castro Decl., ¶ 3, 9, 11. Khechumyan falls well short of demonstrating
21 that his confinement at NWIPC with the medical treatment available is so excessive that it evinces
22 “an expressed intent to punish on the part of detention facility officials.” *Bell*, 441 U.S. at 538.
23 Moreover, Khechumyan’s detention is proportionately related to the Government’s non-punitive
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1 responsibilities and administrative purposes. While civil detainees retain greater liberty protections
2 than individuals convicted of crimes, *see, e.g., Youngberg*, 457 U.S. at 321-22; *Bell*, 441 U.S. at
3 535, Khechumyan’s continued immigration detention pending removal cannot be described as
4 punitive or excessive in relation to the legitimate governmental purpose of protecting the public
5 and ensuring his appearance at his immigration proceedings.

6 3. *Release is not an appropriate remedy for the alleged violations.*

7 The sole relief that Khechumyan seeks is his release from detention. However, he fails to
8 demonstrate that even if the alleged due process violations were established, that they would
9 warrant or require immediate release. Khechumyan has not claimed that his detention anywhere
10 would be unlawful. He limits his claims to NWIPC. This is logical as he does not assert that he
11 was unable to receive adequate medical care when detained by BOP. Thus, it is unclear why release
12 would be the appropriate form of relief here. Or, “[e]ven if Petitioner could show a Fifth
13 Amendment violation, he does not establish that such a violation would justify immediate release,
14 as opposed to injunctive relief that would leave him detained while ameliorating any
15 unconstitutional conditions at the NWIPC.” *Ortiz v. Barr*, No. 20-cv-497, 2020 WL 13577427, at
16 *7 n.8 (W.D. Wash. April 10, 2020); *accord Doe v. Bostock*, No. 24-cv-326, 2024 WL 3291033,
17 at *8 (W.D. Wash. Mar. 29, 2024).

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CONCLUSION

For the foregoing reasons, this Court should deny Khechumyan's Petition in its entirety.

DATED this 31st day of October, 2025.

Respectfully submitted,

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I certify that this memorandum contains 3,756 words, in compliance with the Local Civil Rules.