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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Ruben MENDEZ DOMINGUEZ, Juan  
DELEON SIQUINA, Ramiro  
FERNANDEZ PAZ, Alfredo  
GONZALEZ HERNANDEZ, Alejandro  
SANCHEZ MURILLO, Norberto  
TORRES OROZCO, Francisco BERNAL  
BERNAL, Margarito SANTAELLA  
VEGA, and Benito HERNANDEZ  
MARTINEZ,

Petitioners,

v.

Laura HERMOSILLO, Seattle Field  
Office Acting Director, Enforcement and  
Removal Operations, U.S. Immigration  
and Customs Enforcement (ICE); U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW; Bruce  
SCOTT, Warden, Northwest ICE  
Processing Center,

Respondents.

Case No. 2:25-cv-2337

**PETITION FOR WRIT OF  
HABEAS CORPUS**

**INDIVIDUAL  
ENFORCEMENT OF  
RODRIGUEZ VAZQUEZ BOND  
DENIAL CLASS JUDGMENT**

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**FACTS**

1. Petitioners Ruben Mendez Dominguez, Juan DeLeon Siquina, Ramiro Fernandez Paz, Alfredo Gonzalez Hernandez, Alejandro Sanchez Murillo, Norberto Torres Orozco, Francisco Bernal Bernal, Margarito Santaella Vega, and Benito Hernandez Martinez bring this petition for a writ of habeas corpus to seek enforcement of their rights as members of the Bond Denial Class certified in *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. filed Mar. 20, 2025).<sup>1</sup>

2. On September 30, 2025, this Court issued a final judgment “declar[ing] that Bond Denial Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under 8 U.S.C. § 1225(b)(2).” *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ---, 2025 WL 2782499, at \*27 (W.D. Wash. Sept. 30, 2025).

3. The Court further declared “that the Tacoma Immigration Court’s practice of denying bond to Bond Denial Class members on the basis of § 1225(b)(2) violates the Immigration and Nationality Act.” *Id.*

**Petitioner Ruben Mendez Dominguez**

1. Petitioner Ruben Mendez Dominguez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at Northwest ICE Processing Center (NWIPC) after being apprehended by U.S. Immigration and Customs Enforcement (ICE) on May 20, 2025, *see* Ex. A;<sup>2</sup>
- (b) entered the United States without inspection over twenty years ago and was not apprehended upon arrival, *see* Mendez Decl. ¶¶ 2–3; *see also* Ex. B; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

<sup>1</sup> The Bond Denial Class is comprised of “[a]ll noncitizens without lawful status detained at the Northwest ICE Processing Center [NWIPC] who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival, (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing.” *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ---, 2025 WL 2782499, at \*6 (W.D. Wash. Sept. 30, 2025).

<sup>2</sup> All exhibit citations are to the authenticating declaration of Sydney Maltese filed contemporaneously with this petition.

1           2.       After apprehending Mr. Hernandez on May 20, the Department of Homeland  
2 Security (DHS) placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has  
3 charged Petitioner as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who  
4 entered the United States without inspection. *See* Ex. B.

5           3.       On June 11, 2025, an Immigration Judge (IJ) denied Mr. Mendez's bond request  
6 based on lack of jurisdiction, finding that he is subject to mandatory detention under 8 U.S.C.  
7 § 1225(b)(2)(A). The IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ  
8 would have set bond at \$2,500. Ex. C.

9       **Petitioner Juan DeLeon Siquina**

10          4.       Petitioner Juan DeLeon Siquina is a member of the Bond Denial Class, as he:

- 11           (a)       does not have lawful status in the United States and is currently detained  
12               at NWIPC after being apprehended by ICE on October 25, 2025, *see* Ex.  
13               D;  
14           (b)       entered the United States without inspection over ten years ago and was  
15               not apprehended upon arrival, *see* Ex. E; and  
16           (c)       is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

17          5.       After apprehending Mr. DeLeon on October 25, DHS placed him in removal  
18 proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Petitioner as being inadmissible  
19 under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.  
20 *See* Ex. E.

21          6.       Mr. DeLeon is scheduled for a bond hearing before an IJ on November 24, 2025.  
22 *See* Ex. F.

23       **Petitioner Ramiro Fernandez Paz**

24          7.       Petitioner Ramiro Fernandez Paz is a member of the Bond Denial Class, as he:

- 25           (a)       does not have lawful status in the United States and is currently detained  
26               at NWIPC after being apprehended by U.S. Border Patrol on April 13,  
27               2025, *see* Ex. G;  
          (b)       entered the United States without inspection more than 4 years ago and  
              was not apprehended upon arrival, *see* Ex. H; and  
          (c)       is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

1 8. After apprehending Mr. Fernandez on April 13, DHS placed him in removal  
2 proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Fernandez as being  
3 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States  
4 without inspection. *See* Ex. H.

5 **Petitioner Alfredo Gonzalez Hernandez**

6 9. Petitioner Alfredo Gonzalez Hernandez is a member of the Bond Denial Class, as  
7 he:

- 8 (a) does not have lawful status in the United States and is currently detained  
9 at NWIPC after being apprehended by ICE on November 4, 2025, *see*  
10 Gonzalez Decl. ¶ 4;  
11 (b) entered the United States without inspection over twenty years ago and  
12 was not apprehended upon arrival, *see id.* ¶¶ 2–3; *see also* Ex. I; and  
13 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

14 10. After apprehending Mr. Gonzalez on November 4, DHS placed him in removal  
15 proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Gonzalez as being inadmissible  
16 under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.  
17 *See* Ex. I.

18 **Petitioner Alejandro Sanchez Murillo**

19 11. Petitioner Alejandro Sanchez Murillo is a member of the Bond Denial Class, as he:

- 20 (a) does not have lawful status in the United States and is currently detained  
21 at NWIPC after being apprehended by ICE on October 28, 2025, Ex. J;  
22 (b) entered the United States without inspection over twenty years ago and  
23 was not apprehended upon arrival, *see* Ex. K; and  
24 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

25 12. After apprehending Mr. Sanchez on October 28, DHS placed him in removal  
26 proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Sanchez as being inadmissible  
27 under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.  
*See* Ex. K.

1 **Petitioner Norberto Torres Orozco**

2 13. Petitioner Norberto Torres Orozco is a member of the Bond Denial Class, as he:

- 3 (a) does not have lawful status in the United States and is currently detained  
4 at NWIPC after being apprehended by ICE on or around November 7,  
5 2025, Torres Decl. ¶ 3;
- 6 (b) entered the United States without inspection more than twenty years ago  
7 and was not apprehended upon arrival, *see id.* ¶¶ 2–3; Ex. L, and
- 8 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

9 14. After apprehending Mr. Torres on November 7, DHS placed him in removal  
10 proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Torres as being inadmissible  
11 under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.  
12 *See Ex. L.*

13 **Petitioner Francisco Bernal Bernal**

14 15. Petitioner Francisco Bernal Bernal is a member of the Bond Denial Class, as he:

- 15 (d) does not have lawful status in the United States and is currently detained  
16 at NWIPC after being apprehended by ICE on or around November 8,  
17 2025, Bernal Decl. ¶¶ 3–4;
- 18 (e) entered the United States without inspection more than twenty years ago  
19 and was not apprehended upon arrival, *see id.* ¶¶ 2–3; and
- 20 (f) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

21 16. After apprehending Mr. Bernal on November 8, DHS placed him in removal  
22 proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will  
23 charge Mr. Bernal as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who  
24 entered the United States without inspection.

25 **Petitioner Margarito Santaella Vega**

26 17. Petitioner Margarito Santaella Vega is a member of the Bond Denial Class, as he:

- 27 (g) does not have lawful status in the United States and is currently detained  
at NWIPC after being apprehended by ICE on or around November 15,  
2025, Santaella Decl. ¶¶ 3–4;
- (h) entered the United States without inspection more than twenty years ago  
and was not apprehended upon arrival, *see id.* ¶¶ 2–3; and

1 (i) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

2 18. After apprehending Mr. Santaella on November 15, DHS placed him in removal  
3 proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will  
4 charge Mr. Santaella as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who  
5 entered the United States without inspection.

6 **Petitioner Benito Hernandez Martinez**

7 19. Petitioner Benito Hernandez Martinez is a member of the Bond Denial Class, as  
8 he:

- 9 (j) does not have lawful status in the United States and is currently detained  
10 at NWIPC after being apprehended by ICE on or around November 7,  
11 2025, Hernandez Decl. ¶¶ 3–4;  
12 (k) entered the United States without inspection and was not apprehended  
13 upon arrival, *see id.* ¶¶ 2–3; and  
14 (l) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

15 20. After apprehending Mr. Hernandez on November 7, DHS placed him in removal  
16 proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will  
17 charge Mr. Hernandez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who  
18 entered the United States without inspection.

19 21. The Court should expeditiously grant this petition.

20 22. For all Petitioners, Respondents are bound by the judgment in *Rodriguez Vazquez*,  
21 as it has the full “force and effect of a final judgment.” 28 U.S.C. § 2201(a). Nevertheless,  
22 Respondents continue to flagrantly defy the judgment in that case and continue to subject  
23 Petitioners to unlawful detention despite their clear entitlement to consideration for release on  
24 bond as Bond Denial Class members.

25 23. The Court should accordingly order that within one day, Respondent DHS must  
26 release Mr. Mendez, who has received an alternative bond order by an IJ, or allow for his release  
27 upon payment of the alternative bond amount set by the IJ.

1 24. For the remaining Petitioners, the Court should order their release unless  
2 Respondents provide a bond hearing under 8 U.S.C. § 1226(a) within seven days.

3 **JURISDICTION & VENUE**

4 25. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C.  
5 § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the  
6 Suspension Clause). The Court may grant relief pursuant to 28 U.S.C. § 2241; the Declaratory  
7 Judgment Act, 28 U.S.C. § 2201 *et seq.*; and the All Writs Act, 28 U.S.C. § 1651.

8 26. Venue is proper in this District because Petitioners are detained at the NWIPC in  
9 Tacoma, Washington. Venue is also proper under 28 U.S.C. § 1391(e) because Respondents are  
10 employees, officers, and agencies of the United States, and a substantial part of the events or  
11 omissions giving rise to the claims occurred in this District.

12 **PARTIES**

13 27. Petitioner Ruben Mendez Dominguez was apprehended by immigration officers  
14 on May 20, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class  
15 certified in *Rodriguez Vazquez*.

16 28. Petitioner Juan DeLeon Siquina was apprehended by immigration officers on  
17 October 25, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class  
18 certified in *Rodriguez Vazquez*.

19 29. Petitioner Ramiro Fernandez Paz was apprehended by immigration officers on  
20 April 13, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class  
21 certified in *Rodriguez Vazquez*.

22 30. Petitioner Alfredo Gonzalez Hernandez was apprehended by immigration officers  
23 on or around November 4, 2025, and is currently detained at NWIPC. He is a member of the  
24 Bond Denial Class certified in *Rodriguez Vazquez*.

25 31. Petitioner Alejandro Sanchez Murillo was apprehended by immigration officers  
26 on October 28, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial  
27 Class certified in *Rodriguez Vazquez*.

1 32. Petitioner Norberto Torres Orozco was apprehended by immigration officers on  
2 or around November 7, 2025, and is currently detained at NWIPC. He is a member of the Bond  
3 Denial Class certified in *Rodriguez Vazquez*.

4 33. Petitioner Francisco Bernal Bernal was apprehended by immigration officers on  
5 or around November 8, 2025, and is currently detained at NWIPC. He is a member of the Bond  
6 Denial Class certified in *Rodriguez Vazquez*.

7 34. Petitioner Margarito Santaella Vega was apprehended by immigration officers on  
8 or around November 15, 2025, and is currently detained at NWIPC. He is a member of the Bond  
9 Denial Class certified in *Rodriguez Vazquez*.

10 35. Petitioner Benito Hernandez Martinez was apprehended by immigration officers  
11 on or around November 7, 2025, and is currently detained at NWIPC. He is a member of the  
12 Bond Denial Class certified in *Rodriguez Vazquez*.

13 36. Respondent Laura Hermsillo is the Seattle Field Office Acting Director of ICE's  
14 Enforcement and Removal Operation division. As Petitioners' immediate custodian, she is  
15 responsible for Petitioners' detention and removal. She is named in her official capacity.

16 37. Respondent U.S. Department of Homeland Security (DHS) is the federal agency  
17 responsible for implementing and enforcing the Immigration and Nationality Act (INA),  
18 including the detention and removal of noncitizens.

19 38. Respondent Executive Office for Immigration Review (EOIR) is the federal  
20 agency responsible for implementing and enforcing the INA in removal proceedings, including  
21 for custody redeterminations in bond hearings.

22 39. Respondent Bruce Scott is employed by The Geo Group, Inc., as Warden of the  
23 NWIPC, where Petitioners are detained. He has immediate physical custody of Petitioners. He is  
24 sued in his official capacity.

1 **CLAIMS FOR RELIEF**

2 **Violation of the INA:**  
3 **Request for Relief Pursuant to *Rodriguez Vazquez***

4 40. Petitioners repeat, re-allege, and incorporate by reference each and every  
5 allegation in the preceding paragraphs as if fully set forth herein.

6 41. As members of the Bond Denial Class, Petitioners are entitled to consideration for  
7 release on bond under 8 U.S.C. § 1226(a).

8 42. The judgment in *Rodriguez Vazquez* makes clear that Respondents violate the  
9 INA in applying the mandatory detention statute at § 1225(b)(2) to class members.

10 43. Respondents are parties to *Rodriguez Vazquez* and bound by the Court's  
11 declaratory judgment, which has the full "force and effect of a final judgment." 28 U.S.C.  
12 § 2201(a).

13 44. By denying Petitioners a bond hearing under § 1226(a) and asserting that they are  
14 subject to mandatory detention under § 1225(b)(2), Respondents violate Petitioners' rights under  
15 the INA and this Court's judgment in *Rodriguez Vazquez*.

16 **PRAYER FOR RELIEF**

17 WHEREFORE, Petitioners pray that this Court grant the following relief:

- 18 a. Assume jurisdiction over this matter;
- 19 b. Issue a writ of habeas corpus requiring that within one day, Respondents release  
20 Petitioner Mendez unless they allow for his release upon payment of the  
21 alternative bond amount and any other conditions set by the IJ;
- 22 c. Issue a writ of habeas corpus as to Petitioners DeLeon, Fernandez, Gonzalez,  
23 Sanchez, Torres, Bernal, Santaella, and Hernandez requiring Respondents to  
24 provide a bond hearing under 8 U.S.C. § 1226(a) within seven days;
- 25 d. Award Petitioners attorney's fees and costs under the Equal Access to Justice Act  
26 (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under  
27 law; and

1 e. Grant any other and further relief that this Court deems just and proper.

2 DATED this 20th of November, 2025.

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17 *Counsel for Petitioners*