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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Juan MEDINA OCAMPO, Rafael ALBA
CEJA, Joel COLINDRES ZAMORA,
Adelaida MARTINEZ VAZQUEZ, Edwin
ROJAS MONTES, Cristobal SANCHEZ
SIQUINA, Jenifher DE LOS ANGELES
RODRIGUEZ, Macario BAUTISTA
SANCHEZ, Santiago DOMINGUEZ
JIMENEZ, and Jose Luis CARRILLO
HERNANDEZ,

Petitioners,

v.

Laura HERMOSILLO, Seattle Acting
Field Office 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-2408

**PETITION FOR WRIT OF
HABEAS CORPUS**

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

1 **FACTS**

2 1. Petitioners Juan Medina Ocampo, Rafael Alba Ceja, Joel Colindres Zamora,
3 Adelaida Martinez Vazquez, Edwin Rojas Montes, Cristobal Sanchez Siquina, Jenifher De Los
4 Angeles Rodriguez, Macario Bautista Sanchez, Santiago Dominguez Jimenez, and Jose Luis
5 Carrillo Hernandez bring this petition for a writ of habeas corpus to seek enforcement of their
6 rights as members of the Bond Denial Class certified in *Rodriguez Vazquez v. Bostock*, No. 3:25-
7 CV-05240-TMC (W.D. Wash. filed Mar. 20, 2025).¹

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

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

15 **Petitioner Juan Medina Ocampo**

- 16 1. Petitioner Juan Medina Ocampo is a member of the Bond Denial Class, as he:
- 17 (a) does not have lawful status in the United States and is currently detained
18 at Northwest ICE Processing Center (NWIPC) after being apprehended by
19 U.S. Immigration and Customs Enforcement (ICE) on October 26, 2025,
20 *see Ex. A*,²
 - 21 (b) entered the United States without inspection over fifteen years ago and
22 was not apprehended upon arrival, *cf. id.*; and
 - 23 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

23 ¹ The Bond Denial Class is comprised of “[a]ll noncitizens without lawful status detained
24 at the Northwest ICE Processing Center [NWIPC] who (1) have entered or will enter the United
25 States without inspection, (2) are not apprehended upon arrival, (3) are not or will not be subject
26 to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is
27 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).

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

1 2. After apprehending Mr. Medina on October 26, 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 November 24, an Immigration Judge (IJ) denied Mr. Medina’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 \$12,000. Ex. C.

9 **Petitioner Rafael Alba Ceja**

10 4. Petitioner Rafael Alba Ceja 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 DHS on or around November 18,
13 2025, Alba Decl. ¶¶ 4–5;
- 13 (b) last entered the United States without inspection more than one year ago
14 and was not apprehended upon arrival, *id.* ¶ 3; and
- 15 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

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

20 **Petitioner Joel Colindres Zamora**

21 6. Petitioner Joel Colindres Zamora is a member of the Bond Denial Class, as he:

- 22 (a) does not have lawful status in the United States and is currently detained
23 at NWIPC after being apprehended by DHS on or around November 6,
24 2025, Colindres Decl. ¶¶ 3–4;
- 24 (b) entered the United States without inspection more than three years ago and
25 was not apprehended upon arrival, *id.* ¶ 2; and
- 25 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

1 7. After apprehending Mr. Colindres on or around November 6, DHS placed him in
2 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Colindres 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. E.

5 **Petitioner Adelaida Martinez Vazquez**

6 8. Petitioner Adelaida Martinez Vazquez is a member of the Bond Denial Class, as
7 she:

- 8 (a) does not have lawful status in the United States and is currently detained
9 at NWIPC after being apprehended by ICE on September 30, 2025, *see*
10 Ex. F;
11 (b) entered the United States without inspection over four years ago and was
12 not apprehended upon arrival, *cf. id.* at 5–6;
13 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

14 9. After apprehending Ms. Martinez on September 30, DHS placed her in removal
15 proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. Martinez 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. G.

18 **Petitioner Edwin Rojas Montes**

19 10. Petitioner Edwin Rojas Montes 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 DHS on or around November 10,
22 2025, Rojas Decl. ¶¶ 3–4;
23 (b) entered the United States without inspection over ten years ago and was
24 not apprehended upon arrival, *id.* ¶ 2; and
25 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

26 11. After apprehending Mr. Rojas on or around November 10, DHS placed him in
27 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Rojas as being
inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States
without inspection. *See* Ex. H.

1 **Petitioner Cristobal Sanchez Siquina**

2 12. Petitioner Cristobal Sanchez Siquina 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 DHS on or around November 10,
5 2025, Sanchez Decl. ¶¶ 3–4;
- 6 (b) entered the United States without inspection more than twenty years ago
7 and was not apprehended upon arrival, *id.* ¶ 2; and
- 8 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

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

13 **Petitioner Jenifher De Los Angeles Rodriguez**

14 14. Petitioner Jenifher De Los Angeles Rodriguez is a member of the Bond Denial
15 Class, as she:

- 16 (a) does not have lawful status in the United States and is currently detained
17 at NWIPC after being apprehended by DHS on or around November 6,
18 2025, De Los Angeles Decl. ¶¶ 3–4;
- 19 (b) entered the United States without inspection more than one year ago and
20 was not apprehended upon arrival, *id.* ¶¶ 2–3; *see also* Ex. K; and
- 21 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

22 15. After apprehending Ms. De Los Angeles on or around November 6, DHS placed
23 her in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. De Los Angeles
24 as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United
25 States without inspection. *See* Ex. K.

26 16. Upon information and belief, Ms. De Los Angeles is scheduled for a bond hearing
27 before an IJ on December 3, 2025.

Petitioner Macario Bautista Sanchez

17. Petitioner Macario Bautista Sanchez is a member of the Bond Denial Class, as he:

- 1 (a) does not have lawful status in the United States and is currently detained
2 at NWIPC after being apprehended by DHS on or around November 22,
3 2025, Bautista Decl. ¶¶ 3–4;
- 4 (b) entered the United States without inspection more than twenty-five years
5 ago and was not apprehended upon arrival, *id.* ¶ 2; and
- 6 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

7 18. After apprehending Mr. Bautista on or around November 22, DHS placed him in
8 removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has
9 charged or will charge Mr. Bautista as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as
10 someone who entered the United States without inspection. *See id.* ¶¶ 2–5.

11 **Santiago Dominguez Jimenez**

12 19. Petitioner Santiago Dominguez Jimenez is a member of the Bond Denial Class, as
13 he:

- 14 (a) does not have lawful status in the United States and is currently detained
15 at NWIPC after being apprehended by DHS on or around November 22,
16 2025, Dominguez Decl. ¶¶ 3–4;
- 17 (b) entered the United States without inspection more than twenty-five years
18 ago and was not apprehended upon arrival, *id.* ¶ 2; *see also* Ex. K; and
- 19 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

20 20. After apprehending Mr. Dominguez on or around November 22, DHS placed him
21 in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Dominguez Jimenez
22 as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United
23 States without inspection. *See* Ex. K.

24 **Petitioner Jose Luis Carrillo Hernandez**

25 21. Petitioner Jose Luis Carrillo Hernandez is a member of the Bond Denial Class, as
26 he:

- 27 (a) does not have lawful status in the United States and is currently detained
at NWIPC after being apprehended by DHS on or around November 23,
2025, Carrillo Decl. ¶¶ 3–4;
- (b) entered the United States without inspection more than twenty-five years
ago and was not apprehended upon arrival, *id.* ¶¶ 2–3; and

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

2 22. After apprehending Mr. Carrillo on or around November 23, DHS placed him in
3 removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has
4 charged or will charge Mr. Carrillo as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as
5 someone who entered the United States without inspection. *See id.* ¶¶ 2–5.

6 23. The Court should expeditiously grant this petition.

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

12 25. The Court should accordingly order that within one day, Respondent DHS must
13 release Petitioner Medina, who has received an alternative bond order by an IJ, or allow for his
14 release upon payment of the alternative bond amount set by the IJ.

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

17 **JURISDICTION & VENUE**

18 27. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C.
19 § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the
20 Suspension Clause). The Court may grant relief pursuant to 28 U.S.C. § 2241; the Declaratory
21 Judgment Act, 28 U.S.C. § 2201 *et seq.*; and the All Writs Act, 28 U.S.C. § 1651.

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

PARTIES

1
2 29. Petitioner Juan Medina Ocampo was apprehended by immigration officers on
3 October 26, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class
4 certified in *Rodriguez Vazquez*.

5 30. Petitioner Rafael Alba Ceja was apprehended by immigration officers on or
6 around November 18, 2025, and is currently detained at NWIPC. He is a member of the Bond
7 Denial Class certified in *Rodriguez Vazquez*.

8 31. Petitioner Joel Colindres Zamora was apprehended by immigration officers on or
9 around November 6, 2025, and is currently detained at NWIPC. He is a member of the Bond
10 Denial Class certified in *Rodriguez Vazquez*.

11 32. Petitioner Adelaida Martinez Vazquez was apprehended by immigration officers
12 on September 30, 2025, and is currently detained at NWIPC. She is a member of the Bond
13 Denial Class certified in *Rodriguez Vazquez*.

14 33. Petitioner Edwin Rojas Montes was apprehended by immigration officers on or
15 around November 10, 2025, and is currently detained at NWIPC. He is a member of the Bond
16 Denial Class certified in *Rodriguez Vazquez*.

17 34. Petitioner Cristobal Sanchez Siquina was apprehended by immigration officers on
18 or around November 10, 2025, and is currently detained at NWIPC. He is a member of the Bond
19 Denial Class certified in *Rodriguez Vazquez*.

20 35. Petitioner Jenifher De Los Angeles Rodriguez was apprehended by immigration
21 officers on November 6, 2025, and is currently detained at NWIPC. She is a member of the Bond
22 Denial Class certified in *Rodriguez Vazquez*.

23 36. Petitioner Macario Bautista Sanchez was apprehended by immigration officers on
24 November 22, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
25 Class certified in *Rodriguez Vazquez*.

1 37. Petitioner Santiago Dominguez Jimenez was apprehended by immigration officers
2 on November 22, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
3 Class certified in *Rodriguez Vazquez*.

4 38. Petitioner Jose Luis Carrillo Hernandez was apprehended by immigration officers
5 on November 23, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial
6 Class certified in *Rodriguez Vazquez*.

7 39. Respondent Laura Hermosillo is the Seattle Acting Field Office Director of ICE's
8 Enforcement and Removal Operation division. As Petitioners' immediate custodian, she is
9 responsible for Petitioners' detention and removal. She is named in her official capacity.

10 40. Respondent U.S. Department of Homeland Security (DHS) is the federal agency
11 responsible for implementing and enforcing the Immigration and Nationality Act (INA),
12 including the detention and removal of noncitizens.

13 41. Respondent Executive Office for Immigration Review (EOIR) is the federal
14 agency responsible for implementing and enforcing the INA in removal proceedings, including
15 for custody redeterminations in bond hearings.

16 42. Respondent Bruce Scott is employed by The Geo Group, Inc., as Warden of the
17 NWIPC, where Petitioners are detained. He has immediate physical custody of Petitioners. He is
18 sued in his official capacity.

19 **CLAIMS FOR RELIEF**

20 **Violation of the INA:**

21 **Request for Relief Pursuant to *Rodriguez Vazquez***

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

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

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

1 46. Respondents are parties to *Rodriguez Vazquez* and bound by the Court's
2 declaratory judgment, which has the full "force and effect of a final judgment." 28 U.S.C.
3 § 2201(a).

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

7 **PRAYER FOR RELIEF**

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

- 9 a. Assume jurisdiction over this matter;
- 10 b. Issue a writ of habeas corpus requiring that within one day, Respondents release
11 Petitioner Medina unless they allow for his release upon payment of the
12 alternative bond amount and any other conditions set by the IJ;
- 13 c. Issue a writ of habeas corpus as to Petitioners Alba, Colindres, Martinez, Rojas,
14 Sanchez, and De Los Angeles requiring Respondents to provide a bond hearing
15 under 8 U.S.C. § 1226(a) within seven days;
- 16 d. Award Petitioners attorney's fees and costs under the Equal Access to Justice Act
17 (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under
18 law; and
- 19 e. Grant any other and further relief that this Court deems just and proper.

20 DATED this 26th of November, 2025.

21 s/ Matt Adams
22 Matt Adams, WSBA No. 28287
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s/ Leila Kang
Leila Kang, WSBA No. 48048
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23 s/ Glenda M. Aldana Madrid
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s/ Aaron Korthuis
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25 s/ Amanda Ng
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