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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 YU WANJIN

11 Immigration File No. 

12 Petitioner,

13 v.

14 Todd M. Lyons, Acting Director, Field Office
Director of Enforcement and Removal
15 Operations, Adelanto Field Office, Immigration
and Customs Enforcement; Kristi NOEM,
16 Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
17 HOMELAND SECURITY; Pamela BONDI,
U.S. Attorney General; EXECUTIVE OFFICE
18 FOR IMMIGRATION REVIEW,

19 Respondents.
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Case No.

PETITION FOR WRIT OF
HABEAS CORPUS

1 I. INTRODUCTION

2 Petitioner Yu Wanjin is unlawfully restrained of her liberty by Respondents at the ICE Detention Facility located in California City, California.

3 Petitioner is detained in direct violation of an Immigration Judge's release order, issued
4 by Immigration Judge Carlos Maury, and in contravention of the Flores Settlement Agreement, which governs the custody and release of juveniles who entered the United States with a parent.

5 Federal habeas corpus relief under 28 U.S.C. § 2241 is warranted because Respondents are
6 acting without lawful authority, in excess of statutory power, and in violation of the Due Process Clause of the Fifth Amendment.

7 Petitioner seeks immediate release from ICE custody and an order compelling Respondents to
8 comply with the Immigration Judge's binding release order.

9 II. JURISDICTION AND VENUE

10 This Court has jurisdiction pursuant to 28 U.S.C. § 2241, because Petitioner is in federal custody
11 and challenges the legality of that detention.

12 Jurisdiction is further proper under 28 U.S.C. § 1331, as this action arises under the Constitution,
13 laws, and treaties of the United States.

14 Venue is proper in this District under 28 U.S.C. § 2241(a) and § 1391(e) because Petitioner is
15 detained within this District and Respondents exercise authority here.

16 III. PARTIES

17 Petitioner Yu Wanjin is a noncitizen currently detained by ICE at the California City ICE
18 Detention Facility.

19 Respondent Todd M. Lyons is the Acting Director of ICE and has legal custody over ICE
20 detainees nationwide.

21 Respondent Juan Acosta is the Field Office Director for ICE Enforcement and Removal
22 Operations in the Los Angeles Field Office and is responsible for detention decisions within this
23 jurisdiction.

24 Respondent Warden is the immediate custodian of Petitioner and is a proper respondent
under *Rumsfeld v. Padilla*, 542 U.S. 426 (2004).

IV. FACTUAL BACKGROUND

1 Petitioner entered the United States on or about February 10, 2016, as a juvenile, together with
2 her mother, Qijiang Wang.

3 Because Petitioner entered the country as a minor accompanied by a parent, her custody and
4 release are governed by the Flores Settlement Agreement.

5 Immigration Judge Carlos Maury issued an order releasing Petitioner from ICE custody, finding
6 continued detention unwarranted and inconsistent with governing law.

7 Despite this clear and binding judicial order, ICE has refused to release Petitioner and continues
8 to detain her at the California City ICE Detention Facility.

9 ICE's continued detention of Petitioner is arbitrary, unlawful, and ultra vires, and directly
10 contradicts the Immigration Judge's authority under the Immigration and Nationality Act and
11 federal regulations.

12 Petitioner has exhausted all available administrative remedies, or such remedies are futile where
13 ICE is acting in open defiance of a judicial release order.

14 V. LEGAL GROUNDS FOR RELIEF

15 COUNT I

16 Unlawful Detention in Violation of 28 U.S.C. § 2241

17 Petitioner incorporates all preceding paragraphs.

18 ICE lacks statutory authority to detain Petitioner where an Immigration Judge has ordered her
19 release.

20 Continued detention without legal basis violates § 2241 and warrants immediate habeas relief.

21 COUNT II

22 Violation of the Flores Settlement Agreement

23 Petitioner entered the United States as a juvenile with her mother and is therefore protected by
24 the Flores Agreement.

Flores requires release from detention without unnecessary delay when a suitable parent or
guardian is available.

ICE's refusal to release Petitioner violates binding federal court-approved settlement obligations.

25 COUNT III

26 Violation of the Fifth Amendment – Due Process

Continued detention despite a valid judicial release order constitutes punishment without due process of law.

ICE's actions are arbitrary, capricious, and shock the conscience.

COUNT IV

Violation of Separation of Powers

ICE's refusal to comply with an Immigration Judge's order undermines the authority of the Executive Office for Immigration Review and violates basic separation-of-powers principles.

VI. IRREPARABLE HARM

Petitioner suffers ongoing loss of liberty, emotional distress, and family separation.

No adequate remedy exists at law other than immediate release.

VII. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

A. Issue a Writ of Habeas Corpus ordering Respondents to immediately release Yu Wanjin from ICE custody;

B. Declare that Petitioner's detention is unlawful;

C. Order Respondents to comply with the Immigration Judge's release order and the Flores Settlement Agreement;

D. Enjoin ICE from re-detaining Petitioner absent lawful authority;

E. Grant such other and further relief as the Court deems just and proper.

12/14/25
DATE-----

andy miri

ATTORNEY FOR PETITIONER

ANDY MIRI, ESQ

1 **VERIFICATION**

2 I, YU WANJIN, DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
3 UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF
4 MY KNOWLEDGE.

5 EXECUTED ON: 12/14/25

6 YU WANJIN, PETITIONER

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1 **ATTACH EXHIBITS**

- 2 • **EXHIBIT A** – IJ CARLOS MAURY RELEASE ORDER
3 • **EXHIBIT B** – PROOF OF JUVENILE ENTRY WITH MOTHER (I-213 / NTA /
4 ORR/FLORES RECORDS)
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EXH "A"



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A-Number:  YU, WANJING

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Removal

Charging Doc. Date: **11/21/2025**

Case Pending

Bond

Charging Doc. Date: **11/21/2025**

Bond Request Date: **11/27/2025**

Case Completed

End of list. Please file a Form EOIR-27 or EOIR-28 using "Appearances" link in the header to view additional cases.

Court Information

Case Type:

Bond

Bond Request Date:

11/27/2025

Alien Name:

YU, WANJING

Hearing Location:

-- NA --

Immigration Court:

10250 RANCHO RD, SUITE 201A
ADELANTO, CA 92301

Next Bond Hearing:

-- NA --

IJ Decision Date:

12/05/2025

Bond Decision:

The Immigration Judge ordered release under the Flores Agreement.

Hearing Medium:

-- NA --

Court Actions

eROP Documents

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Actions	Document Type	Filed Date	Filed At
	EOIR-33/IC, Alien's Change of Address Form / Immigration Court	12/11/2025	Court
	Order - Bond Order (Bond)	12/05/2025	Court

Actions	Document Type	Filed Date	Filed At
	Evidence	12/03/2025	Court
	Evidence Part 02	12/03/2025	Court
	CASE Notice	11/28/2025	Court
	Bond Redetermination Request	11/27/2025	Court
	EOIR-28, Notice of Entry of Appearance as an Attorney or Representative before the Immigration Court	11/27/2025	Court
	Evidence Part 01	11/27/2025	Court

Total Count: 8

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