

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Norma ESTRELLA ZAVALA, Alfonso  
CAMPOS GARCIA, Alejandro MURILLO-  
GIL, Irma VELASQUEZ GOMEZ, Jessenia  
ROMERO MATAMOROS, Rafael  
CISNEROS GAMINO, Benito SANDRE  
GOMEZ, and Jose Ismael RECINOS-  
ACOSTA,

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-2627

**PETITION FOR WRIT OF  
HABEAS CORPUS**

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

1 **FACTS**

2 1. Petitioners Norma Estrella Zavala, Alfonso Campos Garcia, Alejandro Murillo-  
3 Gil, Irma Velasquez Gomez, Jessenia Romero Matamoros, Rafael Cisneros Gamino, Benito  
4 Sandre Gomez, and Jose Ismael Recinos-Acosta bring this petition for a writ of habeas corpus to  
5 seek enforcement of their rights as members of the Bond Denial Class certified in *Rodriguez*  
6 *Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. filed Mar. 20, 2025).<sup>1</sup>

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

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

14 **Petitioner Norma Estrella Zavala**

15 4. Petitioner Norma Estrella Zavala is a member of the Bond Denial Class, as she:

- 16 (a) does not have lawful status in the United States and is currently detained  
17 at Northwest ICE Processing Center (NWIPC) after being apprehended by  
18 U.S. Immigration and Customs Enforcement (ICE) on or around  
19 December 3, 2025, Estrella Decl. ¶¶ 3–4;<sup>2</sup>
- 20 (b) entered the United States without inspection around twenty-five years ago  
21 and was not apprehended upon arrival, *see id.* ¶¶ 2–3; and
- 22 (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

23 <sup>1</sup> 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  
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).

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

1           5.       After apprehending Ms. Estrella on or around December 3, the Department of  
2 Homeland Security (DHS) placed her in removal proceedings pursuant to 8 U.S.C. § 1229a.  
3 Upon information and belief, DHS has charged or will charge Petitioner as being inadmissible  
4 under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

5 **Petitioner Alfonso Campos Garcia**

- 6           6.       Petitioner Alfonso Campos Garcia is a member of the Bond Denial Class, as he:
- 7           (a) does not have lawful status in the United States and is currently detained at  
8           NWIPC after being apprehended by DHS on or around December 5, 2025, *see*  
9           Ex. A; Campos Decl. ¶¶ 3–4;
  - 10          (b) last entered the United States without inspection nearly twenty years ago and  
11          was not apprehended upon arrival, *see* Ex. A; Campos. Decl. ¶¶ 2–3; and
  - 12          (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

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

17 **Petitioner Alejandro Murillo-Gil**

- 18           8.       Petitioner Alejandro Murillo-Gil is a member of the Bond Denial Class, as he:
- 19           (a) does not have lawful status in the United States and is currently detained at  
20           NWIPC after being apprehended by DHS on or around November 18, 2025,  
21           *see* Ex. B; Murillo-Gil Decl. ¶¶ 3–4;
  - 22           (b) entered the United States without inspection more than twenty-five years ago  
23           and was not apprehended upon arrival, *see* Ex. B; Murillo-Gil Decl. ¶¶ 2–3;  
24           and
  - 25           (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

26           9.       After apprehending Mr. Murillo-Gil on or around November 18, DHS placed him  
27 in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Murillo-Gil as being  
inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States  
without inspection. *See* Ex. B.

1 **Petitioner Irma Velasquez Gomez**

2 10. Petitioner Irma Velasquez Gomez is a member of the Bond Denial Class, as she:

3 (a) does not have lawful status in the United States and is currently detained at  
4 NWIPC after being apprehended by ICE on or around October 30, 2025, *see*  
5 Ex. C; Velasquez Decl. ¶¶ 3–4;

6 (b) entered the United States without inspection more than two years ago and was  
7 not apprehended upon arrival, *see id.*; Ex. C; Velasquez Decl. ¶¶ 2–3;

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

9 11. After apprehending Ms. Velasquez on or around October 30, DHS placed her in  
10 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. Velasquez 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. C.

13 **Petitioner Jessenia Romero Matamoros**

14 12. Petitioner Jessenia Romero Matamoros is a member of the Bond Denial Class, as  
15 she:

16 (a) does not have lawful status in the United States and is currently detained at  
17 NWIPC after being apprehended by ICE on or around September 28, 2025,  
18 *see* Ex. D;

19 (b) entered the United States without inspection twenty years ago and was not  
20 apprehended upon arrival, *see id.*; Ex. E;

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

22 13. After apprehending Ms. Romero on or around September 28, DHS placed her in  
23 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. Romero as being  
24 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States  
25 without inspection. *See* Ex. E.

26 14. On December 19, 2025, an Immigration Judge (IJ) denied Ms. Romero’s bond  
27 request, finding that she is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). The  
IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ would have set bond  
at \$20,000. Ex. F.

1 **Petitioner Rafael Cisneros Gamino**

2 15. Petitioner Rafael Cisneros Gamino 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 at  
4 NWIPC after being apprehended by ICE on or around December 8, 2025, see  
5 Cisneros Decl. ¶¶ 2–4;

6 (b) entered the United States without inspection over twenty-five years ago and  
7 was not apprehended upon arrival, see *id.* ¶ 2; Ex. G;

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

9 16. After apprehending Mr. Cisneros on or around December 8, DHS placed him in  
10 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Cisneros 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. G.

13 **Petitioner Benito Sandre Gomez**

14 17. Petitioner Benito Sandre Gomez is a member of the Bond Denial Class, as he:

15 (a) does not have lawful status in the United States and is currently detained at  
16 NWIPC after being apprehended by ICE on or around November 12, 2025,  
17 *see* Sandre Decl. ¶¶ 2–4;

18 (b) entered the United States without inspection over twenty years ago and was  
19 not apprehended upon arrival, *see id.*; Ex. H;

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

21 18. After apprehending Mr. Sandre on or around November 12, DHS placed him in  
22 removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Sandre as being  
23 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States  
24 without inspection. *See* Ex. H.

25 **Petitioner Jose Ismael Recinos-Acosta**

26 19. Petitioner Jose Ismael Recinos-Acosta is a member of the Bond Denial Class, as  
27 he:

1 (a) does not have lawful status in the United States and is currently detained at  
2 NWIPC after being apprehended by ICE on or around September 2, 2025, *see*  
3 Recinos-Acosta Decl. ¶¶ 2–4; Ex. I;

4 (b) entered the United States without inspection nearly twenty years ago and was  
5 not apprehended upon arrival, *see* Recinos-Acosta Decl. ¶ 2; Ex. I;

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

7 20. After apprehending Mr. Recinos-Acosta on or around September 2, DHS placed  
8 him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Recinos-Acosta  
9 as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United  
10 States without inspection. *See* Ex. I.

11 21. On October 1, 2025, an IJ denied Mr. Recinos-Acosta’s bond request, finding that  
12 he is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) and denying bond based on  
13 lack of jurisdiction alone. The IJ did not issue any findings regarding his flight risk or danger,  
14 entered no ruling in the alternative, and set no alternative bond amount. Ex. J.

15 22. The Court should expeditiously grant this petition.

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

21 24. The Court should accordingly order that within one day, Respondent DHS must  
22 release any petitioner who has received an alternative bond order by an IJ, or allow for those  
23 petitioners’ release upon payment of the alternative bond amount set by the IJ.

24 25. For any Petitioner without an alternative bond order, the Court should order their  
25 release unless Respondents provide a bond hearing under 8 U.S.C. § 1226(a) within seven days.

1 **JURISDICTION & VENUE**

2 26. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C.  
3 § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the  
4 Suspension Clause). The Court may grant relief pursuant to 28 U.S.C. § 2241; the Declaratory  
5 Judgment Act, 28 U.S.C. § 2201 *et seq.*; and the All Writs Act, 28 U.S.C. § 1651.

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

10 **PARTIES**

11 28. Petitioner Norma Estrella Zavala was apprehended by immigration officers on  
12 December 3, 2025, and is currently detained at NWIPC. She is a member of the Bond Denial  
13 Class certified in *Rodriguez Vazquez*.

14 29. Petitioner Alfonso Campos Garcia was apprehended by immigration officers on  
15 or around December 5, 2025, and is currently detained at NWIPC. He is a member of the Bond  
16 Denial Class certified in *Rodriguez Vazquez*.

17 30. Petitioner Alejandro Murillo-Gil was apprehended by immigration officers on or  
18 around November 18, 2025, and is currently detained at NWIPC. He is a member of the Bond  
19 Denial Class certified in *Rodriguez Vazquez*.

20 31. Petitioner Irma Velasquez Gomez was apprehended by immigration officers on  
21 October 30, 2025, and is currently detained at NWIPC. She is a member of the Bond Denial  
22 Class certified in *Rodriguez Vazquez*.

23 32. Petitioner Jessenia Romero Matamoros was apprehended by immigration officers  
24 on September 28, 2025, and is currently detained at NWIPC. She is a member of the Bond  
25 Denial Class certified in *Rodriguez Vazquez*.

1 33. Petitioner Rafael Cisneros Gamino was apprehended by immigration officers on  
2 December 8, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial  
3 Class certified in *Rodriguez Vazquez*.

4 34. Petitioner Benito Sandre Gomez was apprehended by immigration officers on  
5 November 12, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial  
6 Class certified in *Rodriguez Vazquez*.

7 35. Petitioner Jose Ismael Recinos-Acosta was apprehended by immigration officers  
8 on or around September 2, 2025, and is currently detained at NWIPC. He is a member of the  
9 Bond Denial Class certified in *Rodriguez Vazquez*.

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

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

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

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

22 **CLAIMS FOR RELIEF**

23 **Violation of the INA:**

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

25 40. Petitioners repeat, re-allege, and incorporate by reference each and every  
26 allegation in the preceding paragraphs as if fully set forth herein.  
27

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

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

5 43. Respondents are parties to *Rodriguez Vazquez* and bound by the Court's  
6 declaratory judgment, which has the full "force and effect of a final judgment." 28 U.S.C.  
7 § 2201(a).

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

11 **PRAYER FOR RELIEF**

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

- 13 a. Assume jurisdiction over this matter;
- 14 b. Issue a writ of habeas corpus requiring that within one day, Respondents release  
15 any Petitioner with an alternative bond order unless Respondents allow for their  
16 release upon payment of the alternative bond amount and any other conditions set  
17 by the IJ;
- 18 c. Issue a writ of habeas corpus as to any Petitioners without an alternative bond  
19 order requiring Respondents to provide a bond hearing under 8 U.S.C. § 1226(a)  
20 within seven days of a request from Petitioners;
- 21 d. Order that upon Petitioners' release, Respondents must return to Petitioners any  
22 personal property, including personal identification documents (other than a  
23 passport) and employment authorization documents;
- 24 e. Award Petitioners attorney's fees and costs under the Equal Access to Justice Act  
25 (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under  
26 law; and
- 27 f. Grant any other and further relief that this Court deems just and proper.

1 DATED this 19th of December, 2025.

2 s/ Matt Adams  
3 Matt Adams, WSBA No. 28287  
4 matt@nwirp.org

s/ Leila Kang  
Leila Kang, WSBA No. 48048  
leila@nwirp.org

5 s/ Glenda M. Aldana Madrid  
6 Glenda M. Aldana Madrid, WSBA No. 46987  
glenda@nwirp.org

s/ Aaron Korthuis  
Aaron Korthuis, WSBA No. 53974  
aaron@nwirp.org

7 s/ Amanda Ng  
8 Amanda Ng, WSBA No. 57181  
amanda@nwirp.org

9 NORTHWEST IMMIGRANT  
10 RIGHTS PROJECT  
11 615 Second Ave., Suite 400  
12 Seattle, WA 98104  
13 (206) 957-8611

*Counsel for Petitioners*

14

15

16

17

18

19

20

21

22

23

24

25

26

27