

DETAINED

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THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE, WASHINGTON

KAE A. SAELEE,

Petitioner,

v.

PAMELA BONDI, United States Attorney
General;
KRISTI NOEM, Secretary of U.S.
Department of Homeland Security;
TODD LYONS, Acting Director, U.S.
Immigration and Customs Enforcement;
LAURA HERMOSILLO, Acting Seattle Field
Office Director, Immigration and Customs
Enforcement;
BRUCE SCOTT, Facility Administrator,
Northwest ICE Processing Center;

Respondents.

Case No.:

PETITION FOR WRIT OF HABEAS
CORPUS PURSUANT TO
28 U.S.C. § 2241

Agency File Number:



PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. The petitioner, Kae A. Saelee is a 54-year-old non-citizen who is currently being held in detention at the Northwest ICE Processing Center (NWIPC) by U.S. Immigration and Citizenship Enforcement (ICE).

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9. Respondent Bruce Scott is the Facility Administrator of the Northwest ICE Processing Center, the privately-operated immigration detention center where the petitioner is being detained. He is the immediate physical custodian of the petitioner, and he is sued in his official capacity.

JURISDICTION

10. This Court has jurisdiction over this matter under 18 U.S.C. § 1331 (federal question jurisdiction); 28 U.S.C. § 2241 (habeas corpus); and 28 U.S.C. § 1651 (All Writs Act).

11. Further, this Court has jurisdiction under the Suspension Clause of Article I, § 9, cl. 2, of the U.S. Constitution. *See INS v. St. Cyr*, 533 U.S. 289 (2001).

12. No other petitions, appeals, or motions regarding habeas corpus have been filed with any other court.

13. Venue in the Western District of Washington is appropriate under 28 U.S.C. § 1391(e)(1) because the petitioner is detained in this judicial district and because a substantial part of the events or omissions giving rise to the claim occurred in this judicial district.

FACTUAL BACKGROUND

14. Kae A. Saelee is a 54-year-old non-citizen who is currently detained at the NWIPC by ICE. NWIPC is a privately owned and operated immigration detention facility run by the GEO Group on behalf of ICE.

15. Mr. Saelee was born in 1971 in Laos. After living for a time in Thailand as a refugee, he came to the United States in 1988 as a Lawful Permanent Resident. He was 15 or 16 when he arrived, and he has lived in the United States for 37 years.

1 16. In 1997, Mr. Saelee was ordered removed. Because Laos did not accept deportees
2 from the United States, he was placed on an Order of Supervision. He was initially required to
3 check in every month, and later he was required to check in every year.

4 17. Since 1997, Mr. Saelee has married and raised a daughter, who is now 25 years
5 old. He cares for his in-laws by helping to bathe them, cook for them, and clean for them. On
6 information and belief, if he is detained for much longer, his wife will need to quit her job,
7 causing financial hardship.

8 18. At his most recent check-in, in mid-October 2025, Mr. Saelee was instructed to
9 return in six months.

10 19. On October 31, 2025, in the early morning, ICE detained Mr. Saelee at his home.
11 Nothing happened to precipitate the revocation of the order of supervision. ICE revoked the
12 order of supervision without any notice or cause.

13 20. Laos does not have a formal repatriation agreement with the U.S. *Asian Law*
14 *Caucus Resources*, [https://www.asianlawcaucus.org/news-resources/guides-reports/resources-](https://www.asianlawcaucus.org/news-resources/guides-reports/resources-southeast-asian-refugees-facing-deportation)
15 [southeast-asian-refugees-facing-deportation](https://www.asianlawcaucus.org/news-resources/guides-reports/resources-southeast-asian-refugees-facing-deportation). Historically, Laos rarely issued travel documents
16 for deportation. In recent months, it has permitted repatriation in a few isolated cases, but there is
17 no reason to believe that it will issue travel documents for Mr. Saelee.

18 21. Mr. Saelee has now been in custody for 53 days.
19

20 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

21 22. There are no administrative remedies that can provide the relief the petitioner
22 seeks.
23

IRREPARABLE INJURY

23. Mr. Saelee has suffered irreparable injury as a result of the detention. His physical liberty continues to be restrained, in penal-like conditions, *see, e.g., Maliwat v. Scott*, No. 2:25-cv-00788-TMC, 2025 U.S. Dist. LEXIS 152663, at *15 (W.D. Wash. August 7, 2025), and no just cause for doing so can be specified. He has been unavailable to continue his role as caretaker for his in-laws. And he has been deprived of his constitutional rights, which “unquestionably constitutes irreparable injury.” *de Jesus Ortega Melendres v. Arpaio*, 695 F.3d 990, 1002 (2012).

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

Violation of 8 C.F.R. 241.4(l) and 8 C.F.R. 241.13(i)(3)

22. The petitioner re-alleges and incorporates by reference the allegations set forth in each of the preceding paragraphs of this Petition.

23. The continued detention violates 8 C.F.R. 241.4(l)(1) and 8 C.F.R. 241.13(i)(3), because Mr. Saelee was not adequately notified of the reasons for the revocation of supervision.

24. The continued detention violates 8 C.F.R. 241.4(l)(2) because there exist here none of the circumstances permitting revocation of supervision, such as failure to comply with supervision.

SECOND CLAIM FOR RELIEF

Violation of 8 U.S.C. 1231(a)

25. The petitioner re-alleges and incorporates by reference the allegations set forth in each of the preceding paragraphs of this Petition.

1 26. The continued detention violates 8 U.S.C. 1231(a). The 90-day statutory removal
2 period under 8 U.S.C. 1231(a)(1) began and ended many years ago, and no other provision of 8
3 U.S.C. 1231(a) justifies detention.

4 27. In addition, the continued detention violates 8 U.S.C. 1231(a) because there is no
5 significant likelihood of removal in the reasonably foreseeable future. *Zadvydas v. Davis*, 533
6 U.S. 678, 699 (2001). There is no reason to believe that Mr. Saelee can be removed to Laos or to
7 any other country.

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9 **THIRD CLAIM FOR RELIEF**
10 **Violation of Due Process**

11 28. The petitioner re-alleges and incorporates by reference the allegations set forth in
12 each of the preceding paragraphs of this Petition.

13 29. The continued detention violates the petitioner's right to Due Process under the
14 Fifth Amendment because the respondents violated their own regulations in revoking the order
15 of supervision. *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260 (1954).

16 30. The continued detention also violates Due Process because it is not reasonably
17 related to a legitimate government purpose. *Zadvydas*, 533 U.S. at 690. This detention has no
18 purpose at all.

19
20 **PRAYER FOR RELIEF**

21 WHEREFORE, Petitioner prays that this Court grant the following relief:

- 22 a. Assume jurisdiction over this matter;
- 23 b. Issue a writ of habeas corpus ordering the respondents to immediately release Mr. Saelee
from their custody;

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- 1 c. Issue an order preventing the respondents from once again taking Mr. Saelee into custody
2 unless they have executable travel documents to remove him from the United States and
3 they provide him with notice and a meaningful hearing before detaining him;
4 d. Issue an order providing for an award of attorney's fees and costs; and
5 e. Grant such other relief as may be just and reasonable.
6

7 Dated: December 23, 2025.

8 /s/ Kelly Vomacka

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