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

JUN REN,

Petitioner,

v.

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

Respondents.

Case No.: 2:25-cv-2693

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

Agency File Number:



**PETITION FOR WRIT OF HABEAS CORPUS**

**PETITION FOR WRIT OF HABEAS CORPUS  
(CASE NO. 2:25-cv-2693)**

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**INTRODUCTION**

1  
2 1. Petitioner Jun Ren (“Petitioner” or “Mr. Ren”) is a civil immigration detainee  
3 currently held at the Northwest ICE Processing Center (“NWIPC”) in Tacoma, Washington. He  
4 has been detained by Immigration and Customs Enforcement (“ICE”) since November 6, 2025.  
5 Petitioner brings this habeas action to challenge the constitutionality of his continued detention.

6 2. Petitioner’s detention is unlawful because ICE is holding him under conditions  
7 that violate the Fifth and Sixth Amendments to the United States Constitution. Petitioner is  
8 legally blind, suffers from a progressive retinal disease requiring specialized ophthalmologic  
9 care, and has not received necessary medical treatment or reasonable disability accommodations  
10 while detained. His continued confinement at NWIPC places him at substantial risk of  
11 irreversible vision loss and physical harm. These conditions are not incidental to detention; they  
12 are dangerous, punitive, and constitutionally impermissible for a civil detainee.

13 3. At the same time, Petitioner is a criminal defendant in an active state court  
14 prosecution with a required court appearance on January 16, 2026 and a jury trial scheduled for  
15 January 26, 2026. His ICE detention—particularly given his blindness and lack of  
16 accommodations—has materially interfered with his ability to consult with counsel, review  
17 discovery, and prepare his defense, in violation of the Sixth Amendment. Continued detention  
18 threatens to deprive him of a meaningful opportunity to defend himself and risks the issuance of  
19 a warrant should he be unable to appear.

20 4. This habeas petition seeks only immediate release, because no lesser remedy can  
21 cure the ongoing constitutional violations.

22 ///

23 ///

1 **JURISDICTION**

2 5. This action arises under the Constitution of the United States and the Immigration  
3 and Nationality Act (INA), 8 U.S.C. § 1101 et. seq.

4 6. This court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus),  
5 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution  
6 (Suspension Clause).

7 7. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et.  
8 seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et. seq., and the All Writs Act, 28 U.S.C. §  
9 1651.

10 8. Jurisdiction is not barred by 8 U.S.C. § 1226(e) because Petitioner does not seek  
11 review of a discretionary bond determination, which is under appeal. He challenges conditions  
12 and consequences of detention that are collateral to removal proceedings, which remain  
13 cognizable in habeas.

14 **VENUE**

15 9. Venue is proper in this District because Mr. Ren is detained at NWIPC in  
16 Tacoma, within the Western District of Washington.

17 **REQUIREMENTS OF 28 U.S.C. §§ 2241, 2243**

18 10. The Court must grant the petition for writ of habeas corpus or issue an order to  
19 show cause (OSC) to the Respondents “forthwith,” unless the petitioner is not entitled to relief.  
20 28 U.S.C. § 2243. If an OSC is issued, the Court must require Respondents to file a return  
21 “within three days unless for good cause additional time, not exceeding twenty days, is allowed.”  
22 *Id.* (emphasis added).

1 11. Courts have long recognized the significance of the habeas statute in protecting  
2 individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most  
3 important writ known to the constitutional law of England, affording as it does a swift and  
4 imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391,  
5 400 (1963) (emphasis added).

6 12. Because Mr. Ren is in ICE custody, this Court has jurisdiction under 28 U.S.C. §  
7 2241, and immediate relief is required.

8 **PARTIES**

9 13. Petitioner is a native and citizen of China who entered the United States lawfully  
10 with his family in June 2023. He and his wife filed a timely asylum application in September  
11 2023 based on [REDACTED] and that  
12 application remains pending. Mr. Ren is currently detained in ICE custody at the Northwest ICE  
13 Processing Center in Tacoma, Washington

14 14. Respondent Laura Hermosillo is the Field Office Director for the Seattle Field  
15 Office, Immigration and Customs Enforcement and Removal Operations (“ICE”). The Seattle  
16 Field Office is responsible for local custody decisions relating to non-citizens charged with being  
17 removable from the United States, including the arrest, detention, and custody status of non-  
18 citizens. The Seattle Field Office’s area of responsibility includes Alaska, Oregon, and  
19 Washington. Respondent Hermosillo is a legal custodian of Petitioner.

20 15. Respondent Todd Lyons is the acting director of U.S. Immigration and Customs  
21 Enforcement, and he has authority over the actions of respondent Drew Bostock and ICE in  
22 general. Respondent Lyons is a legal custodian of Petitioner.

1 16. Respondent Kristi Noem is the Secretary of the Department of Homeland Security  
2 (DHS) and has authority over the actions of all other DHS Respondents in this case, as well as all  
3 operations of DHS. Respondent Noem is a legal custodian of Petitioner.

4 17. Respondent Pamela Bondi is the Attorney General of the United States, and as  
5 such has authority over the Department of Justice, which includes the Executive Office for  
6 Immigration Review (“EOIR”). EOIR includes, among other components, the immigration  
7 courts located in various offices throughout the United States.

8 18. Respondent Bruce Scott is employed by the private corporation GEO Group, Inc.,  
9 as Warden of the NWIPC, where Petitioner is detained. He has immediate physical custody of  
10 Petitioner.

11 19. This action is commenced against all Respondents in their official capacities.

12 20. The validity of Petitioner’s prior removal order is not currently the subject of any  
13 judicial proceeding.

14 **LEGAL FRAMEWORK**

15 21. Immigration detention is civil, not punitive. *See Zadvydas v. Davis*, 533 U.S. 678,  
16 690 (2001). Civil detainees may not be subjected to conditions that amount to punishment. *Bell*  
17 *v. Wolfish*, 441 U.S. 520, 535–37 (1979); *Kingsley v. Hendrickson*, 576 U.S. 389, 400 (2015).  
18 Punishment may be shown through an express intent to punish or a condition that is not  
19 “reasonably related to a legitimate governmental objective.” *Bell*, 441 U.S. at 539; *see also*  
20 *Kingsley*, 576 U.S. at 398 (clarifying that “a pretrial detainee can prevail by providing only  
21 objective evidence that the challenged governmental action is not rationally related to a  
22 legitimate governmental objective or that it is excessive in relation to that purpose”).  
23

1           22.     In addition, “when the State takes a person into its custody and holds him there  
2 against his will, the Constitution imposes upon it a corresponding duty to assume some  
3 responsibility for his safety and general well-being.” *DeShaney v. Winnebago Cty. Dep't of Soc.*  
4 *Servs.*, 489 U.S. 189, 199-200 (1989). Thus, for example, the government violates the Due  
5 Process Clause if it fails to provide civil detainees with “food, clothing, shelter, medical care,  
6 and reasonable safety.” *Id.* at 200. Claims involving the right to adequate medical care “must be  
7 evaluated under an objective deliberate indifference standard.” *Gordon v. Cty. of Orange*, 888  
8 F.3d 1118, 1124-1125 (9th Cir. 2018).

9           23.     To establish deliberate indifference, Petitioner must show: (1) Respondents made  
10 an intentional decision with respect to conditions of confinement; (2) the decision put him at  
11 substantial risk of suffering serious harm; (3) Respondents did not take reasonable available  
12 measures to abate that risk; and (4) the failure to mitigate the risk caused Petitioner’s injuries.  
13 *Sandoval v. County of San Diego*, 985 F.3d 657, 669 (9th Cir. 2021) (citing *Gordon*, 888 F.3d at  
14 1125). Satisfaction of the third element requires a showing that the defendant’s actions were  
15 “‘objectively unreasonable’” meaning “ ‘more than negligence but less than subjective intent -  
16 something akin to reckless disregard.’” *Id.*

17           24.     Due process and federal disability law under the Rehabilitation Act require that  
18 immigration detainees with disabilities receive reasonable accommodations necessary to ensure  
19 meaningful access to detention processes and the courts.

20           25.     In *Franco-Gonzalez v. Holder*, the U.S. District Court for the Central District of  
21 California held that immigration detainees with serious mental disabilities must be provided  
22 accommodations sufficient to permit meaningful participation in their proceedings, including  
23

1 access to counsel and comprehension of legal processes. 2013 U.S. Dist. LEXIS 186258, at \*11–  
2 14 (C.D. Cal. Apr. 23, 2013).

3 26. Although *Franco-Gonzalez* arose under the Rehabilitation Act, its reasoning has  
4 been relied upon in due process analyses where disability renders detention functionally punitive.  
5 *Id.*; see also *Doe v. Bostock*, 2024 U.S. Dist. LEXIS 102019, at \*27–30

6 27. Government action that materially interferes with access to counsel violates due  
7 process and, where criminal proceedings are pending, the Sixth Amendment. *Maine v. Moulton*,  
8 474 U.S. 159, 170–71 (1985).

9 28. In *Doe v. Wolf*, the U.S. Court for the Southern District of California held that  
10 restrictions on access to counsel in immigration custody violated due process and federal law  
11 where they interfered with the ability to consult meaningfully with retained counsel. 432 F.  
12 Supp. 3d 1200, 1210–14 (S.D. Cal. 2020). The court emphasized that such claims are collateral  
13 to removal proceedings and squarely reviewable in habeas. *Id.*

14 29. Where immigration detention materially interferes with a criminal defendant’s  
15 Sixth Amendment rights—including the ability to consult counsel, review discovery, and appear  
16 in court—continued detention becomes unconstitutional as applied. *Zadvydas*, 533 U.S. at 690;  
17 *Jones v. Blanas*, 393 F.3d 918, 933 (9th Cir. 2004).

### 18 **FACTUAL BACKGROUND**

19 30. Petitioner is a native and citizen of China. Mr. Ren, along with his wife and their  
20 son, he entered the U.S. in June 2023 on valid visitor visas and promptly filed for asylum based  
21 on [REDACTED] The  
22 Ren family settled in Vancouver, Washington, where Mr. Ren gained lawful employment as a  
23 massage therapist.

1 31. On February 4, 2024, Mr. Ren was arrested in Clark County, Washington, and  
2 charged with an offense arising from [REDACTED]

3 [REDACTED] Mr. Ren vehemently denies the allegation, and the available evidence has not  
4 corroborated the complainant's account. The state court, recognizing Mr. Ren was not a danger,  
5 released him on bail the very next day (February 5, 2024). From that point until ICE  
6 intervention, Mr. Ren fully complied with all conditions of release: he attended every court  
7 hearing, maintained contact with his attorney, and showed complete respect for the judicial  
8 process.

9 32. ICE officers took him into custody on November 6, 2025. ICE's detention of Mr.  
10 Ren occurred while both his criminal case and asylum case were still pending. At the time of his  
11 immigration arrest, Mr. Ren was actively fighting the state charges and preparing for trial (then  
12 scheduled for January 26, 2026), and he was a derivative beneficiary of his wife's pending  
13 asylum application. ICE transferred Mr. Ren to the NWIPC detention center in Tacoma,  
14 hundreds of miles from his home and defense counsel in Clark County. He has remained  
15 detained at NWIPC from November 6, 2025 to the present, a period of over six weeks and  
16 counting.

17 33. After being detained, Mr. Ren promptly sought release through the immigration  
18 court custody-redetermination process. On December 3, 2025, he filed a motion for a bond  
19 hearing (with supporting evidence) in Tacoma Immigration Court. In that bond packet, Mr. Ren  
20 submitted extensive documentation of his medical condition, his family and community support,  
21 and letters – including one from his public defender – emphasizing that his release was critical  
22 for both his health and his ability to prepare for trial. Despite this showing, the immigration  
23

1 judge found him ineligible for bond on December 10, 2025. The bond denial is currently on  
2 appeal with the Board of Immigration Appeals.

3 34. Mr. Ren has been diagnosed with bilateral retinitis pigmentosa, a hereditary  
4 degenerative disease of the retina that has caused him significant and permanent vision loss. He  
5 is formally certified as legally blind under U.S. standards. Even with corrective lenses, his visual  
6 acuity and fields are so impaired that he cannot safely navigate or perform many daily tasks  
7 without assistance. Retinitis pigmentosa is a progressive condition for which there is no cure, but  
8 close medical monitoring can help manage the disease and potentially slow its progression.

9 35. Before ICE detention, Mr. Ren was an established patient at Kaiser Permanente,  
10 receiving regular care from an optometrist and an ophthalmology specialist team. His treatment  
11 regimen included periodic retinal imaging, visual field testing, and frequent follow-up  
12 appointments to track the degeneration of his retinas and address any complications. Such  
13 vigilance is essential, as the disease's course is unpredictable – sudden declines in vision can  
14 occur, and without immediate intervention or adaptive strategies, Mr. Ren risks further  
15 irreversible sight loss.

16 36. Since ICE detained Mr. Ren on November 6, 2025, he has not received  
17 appropriate ophthalmologic care while in custody. The NWIPC facility's medical unit is not  
18 equipped to manage a complex degenerative eye condition like retinitis pigmentosa. Mr. Ren has  
19 not been evaluated by an ophthalmologist in detention, nor has he undergone the specialized  
20 retinal scans or other tests that his condition requires. The facility simply does not offer the level  
21 of specialized eye care that Mr. Ren needs to preserve what remains of his vision. As a result,  
22 Mr. Ren's disease has been essentially *unmonitored* for nearly two months. This lapse puts him  
23 at an unacceptably high risk of avoidable permanent vision deterioration.

1           37. Mr. Ren has a critical follow-up appointment scheduled with his eye specialists  
2 on December 31, 2025 (an appointment set months in advance, given the importance of year-end  
3 evaluation of his condition). If he remains in custody, he will miss that appointment, losing a  
4 vital opportunity for his doctors to assess the progression of his disease and adjust his care plan.  
5 In short, every additional day of detention poses a threat to Mr. Ren's health and eyesight, harm  
6 that cannot be undone later.

7           38. In addition to the lack of medical care, the detention center has failed to provide  
8 reasonable accommodations for Mr. Ren's blindness. NWIPC staff have not offered Mr. Ren any  
9 assistive devices, accessible formats, or personal assistance to enable him to function as a blind  
10 person in custody. He has not been given a cane, reader services, large print or audio materials,  
11 or any other accommodation one would expect for a detainee who cannot see. Instead, Mr. Ren  
12 has been left to fend for himself in an environment designed for sighted individuals.

13           39. Mr. Ren struggles to navigate the facility's dark corridors and unfamiliar layout –  
14 risking falls or injury – because no one consistently guides him. When he needs help to navigate  
15 the facility, his cell mate is the only one who has offered to help him. He cannot read posted  
16 signs, memos, or schedules, so he often does not know where he is supposed to be or when.

17           40. Critically, Mr. Ren is unable to independently review documents, including legal  
18 paperwork for his cases, because they are provided only in standard printed form. Every form,  
19 evidence packet, or written communication is effectively inaccessible to him unless someone  
20 reads it aloud in Mandarin, or he can somehow magnify it far beyond normal. The facility has  
21 not even provided a magnifying glass. NWIPC's failure to accommodate these needs has left  
22 Mr. Ren essentially in the dark regarding many aspects of his detention and legal process.

1           41.     The lack of accommodations has a direct, adverse impact on Mr. Ren’s legal  
2 rights. Because he cannot read or write effectively in detention, he is hampered in assisting his  
3 attorneys or filing materials on his own behalf. For instance, in his immigration proceedings Mr.  
4 Ren cannot review the Notices, custody papers, or even his court filings without help – he must  
5 rely on others to explain or read to him, which is not always timely or possible. In his criminal  
6 case, he cannot examine discovery documents or legal correspondence from his public defender  
7 unless someone is available to read every line to him in Mandarin. This dependency significantly  
8 delays and impedes communication. Moreover, confidentiality is a concern: Mr. Ren may have  
9 to rely on fellow detainees to relay information from his attorney’s letters, undermining attorney-  
10 client privacy.

11           42.     Mr. Ren’s state criminal case is rapidly approaching critical stages. The Clark  
12 County Superior Court has scheduled an in-person pretrial hearing on January 16, 2026, and a  
13 jury trial on January 26, 2026. Mr. Ren’s physical presence is required at these proceedings, as is  
14 his ability to confer with his public defender and participate in his defense. Prior to his ICE  
15 detention, Mr. Ren had been actively engaged in working with his public defender – meeting in  
16 person, reviewing the evidence (with assistance due to his vision), and formulating his defense  
17 strategy. He remains fully committed to fighting the charges and clearing his name. However,  
18 ICE’s decision to keep him locked up in Tacoma has thrown his defense preparations into  
19 disarray.

20           43.     Since being detained at NWIPC, Mr. Ren’s ability to communicate with his  
21 criminal defense attorney has been severely curtailed. His public defender is based in Clark  
22 County, while Mr. Ren is detained roughly 140 miles away. Consultations that used to occur  
23 readily in person must now be done through monitored phone calls or limited video conference

1 sessions, which are challenging to schedule and inherently less effective. Simple tasks like  
2 reviewing the evidence or going over witness statements are nearly impossible from detention.  
3 For example, Mr. Ren cannot read the police reports or discovery without someone physically  
4 reading them to him in Mandarin, and security restrictions often prevent sharing of sensitive  
5 documents. The result is that Mr. Ren is largely unable to review the prosecution’s evidence or  
6 assist in his own defense at the moment. His counsel has expressed grave concern that, unless  
7 Mr. Ren is released, he will be unprepared for trial – a trial that could determine his liberty and  
8 reputation.

9 44. Continuing to detain Mr. Ren also raises the peril that he might miss his court  
10 dates entirely. While ICE and the state court could theoretically coordinate to have Mr. Ren  
11 transported to Clark County for his hearings, such arrangements are cumbersome and not  
12 guaranteed. If any bureaucratic or logistical issue occurs (e.g. ICE fails to honor a transport  
13 request, or there is a delay), Mr. Ren could be absent when his trial is called, potentially resulting  
14 in a bench warrant. Even if transported on time, appearing in court from custody is prejudicial in  
15 itself – it signals to jurors that he is jailed (despite the presumption of innocence), and it deprives  
16 him of the ability to consult freely with his attorney during trial recesses.

17 **CLAIMS FOR RELIEF**

18 **COUNT ONE**

19 **Violation of the Fifth Amendment**

20 **Unlawful Punitive Detention and Deliberate Indifference to Serious Medical Needs**

21 45. Petitioner restates and realleges all paragraphs as if fully set forth here.

22 46. Under the APA, a court shall “hold unlawful and set aside agency action” that is  
23 arbitrary and capricious. 5 U.S.C. § 706(2)(A).

1 47. Respondents violate the Fifth Amendment by continuing to detain Petitioner  
2 under conditions that expose him to a substantial risk of serious harm. Petitioner's legal  
3 blindness and progressive retinal disease constitute serious medical needs. Detention at NWIPC  
4 has deprived him of necessary medical care and reasonable accommodations, placing him at risk  
5 of irreversible vision loss and physical injury.

6 48. These conditions are excessive in relation to any legitimate immigration purpose.  
7 Petitioner poses no flight risk or danger. Continued detention under these circumstances  
8 amounts to punishment and violates substantive due process.

9 **COUNT TWO**  
10 **Violation of the Fifth Amendment**  
11 **Failure to Provide Reasonable Safety and Disability Accommodations**

12 49. The allegations in the above paragraphs are realleged and incorporated herein.

13 50. Respondents have failed to provide reasonable safety and accommodations for  
14 Petitioner's blindness, denying him equal access to basic services, legal materials, and the ability  
15 to navigate his environment safely. These failures independently violate due process and render  
16 his detention unconstitutional.

17 **COUNT THREE**  
18 **Violation of the Sixth Amendment**  
19 **Interference with Right to Counsel and to Defend Against Criminal Charges**

20 51. The allegations in the above paragraphs are realleged and incorporated herein.

21 52. Respondents' continued detention of Petitioner has materially interfered with his  
22 Sixth Amendment rights. Detention prevents him from reviewing discovery, consulting  
23 meaningfully with counsel, and preparing for trial. His blindness exacerbates these harms.  
Continued detention threatens his ability to appear in court and defend himself, rendering the  
detention unconstitutional as applied.

**PRAYER FOR RELIEF**

WHEREFORE, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Grant the writ of habeas corpus;
- (3) Order Petitioner's immediate release from ICE custody;
- (4) Declare that Petitioner's continued detention violates the Fifth and Sixth Amendments;
- (5) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
- (6) Grant any further relief this Court deems just and proper.

Dated: December 24, 2025.

*/s/ Caroline K. Medeiros*

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