

UNITED STATES DISTRICT COURT Nov 17, 2025

for the
Eastern District of Washington

SEAN F. MCAVOY, CLERK

Annellycis De Jesus Alborno Lira

Petitioner

v.

Tacoma Detention Center/ICE

Respondent

(name of warden or authorized person having custody of petitioner)

WAWD 2:25-cv-02713-LK

Case No. 2:25-cv-00467-SAB
(Supplied by Clerk of Court)

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

Personal Information

1. (a) Your full name: Annellycis De Jesus Alborno Lira
 (b) Other names you have used: N/A
2. Place of confinement:
 (a) Name of institution: Tacoma Detention Center, Tacoma Washington
 (b) Address: 1623 East J Street, Suite 3, Tacoma, WA 98421
 (c) Your identification number: [REDACTED]
3. Are you currently being held on orders by:
 Federal authorities State authorities Other - explain:
ICE
4. Are you currently:
 A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
 If you are currently serving a sentence, provide:
 (a) Name and location of court that sentenced you: _____
 (b) Docket number of criminal case: _____
 (c) Date of sentencing: _____
 Being held on an immigration charge
 Other (explain): I am being detained with no explanation of a charge or reason in the Tacome Detetnion Center.

Decision or Action You Are Challenging

5. What are you challenging in this petition:
 How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

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- Pretrial detention
- Immigration detention
- Detainer
- The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- Disciplinary proceedings
- Other (explain): _____

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: Tacoma Detention Center/ICE Detention Center.

(b) Docket number, case number, or opinion number: N/A

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

I am being detained without probable cause. I have done nothing and have followed absolutely every requirement for my condition of stay including, my weekly Thursday, 8am online camera check-ins and bi-quarterly in person ICSA interviews. At no point have i violated any requirements for my stay.

(d) Date of the decision or action: 09/30/2025

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

- Yes
- No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

I attended my interview at the Immigration locaiton at 925 Jadwin in Richland WA, on September 30, 2025 and was informed that i would be detained with no reason. I have followed every required appointment and have never vilolated any requirments for my stay.

(b) If you answered "No," explain why you did not appeal: I have no charges to appeal. I was unlawfully detained without any warning or violation of my doing. I was simply attending the ICE appoinment as request by Emmigration and Customs Enforcement.

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

- Yes
- No

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(a) If "Yes," provide:

(1) Name of the authority, agency, or court: N/A

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a second appeal: _____

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: N/A

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a third appeal: _____

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

Yes No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

Yes No

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If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

- Yes
- No

If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: _____

11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

- Yes
- No

If "Yes," provide:

- (a) Date you were taken into immigration custody: 09/30/2025
- (b) Date of the removal or reinstatement order: 09/30/2025
- (c) Did you file an appeal with the Board of Immigration Appeals?

- Yes
- No

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If "Yes," provide:

- (1) Date of filing: _____
 - (2) Case number: _____
 - (3) Result: _____
 - (4) Date of result: _____
 - (5) Issues raised: _____
- _____

(d) Did you appeal the decision to the United States Court of Appeals?

Yes No

If "Yes," provide:

- (1) Name of court: _____
 - (2) Date of filing: _____
 - (3) Case number: _____
 - (4) Result: _____
 - (5) Date of result: _____
 - (6) Issues raised: _____
- _____

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

Yes No

If "Yes," provide:

- (a) Kind of petition, motion, or application: _____
 - (b) Name of the authority, agency, or court: _____
- _____
(c) Date of filing: _____
(d) Docket number, case number, or opinion number: _____
(e) Result: _____
(f) Date of result: _____
(g) Issues raised: _____
- _____

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Grounds for Your Challenge in This Petition

- 13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: The 4th Amendment in the Constitution protects against unreasonable seizures for warrantless arrests and detentions. Officers must have probable cause or sufficient facts to believe an individual has violated immigration laws.

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

I entered this country legally and since my arrival I have respected my condions as required. I have at no point violated any requirements or rules that would warrant my detention.

(b) Did you present Ground One in all appeals that were available to you?

Yes No

GROUND TWO: The 14th Ammendment's Equal Protection Clause, prevents discriminatroty enforcement based on race or ethicity. The ammenment also enforces due process rights, which outline that the government cannot arbitrarily deprive individuals of liberty without fair procedures. An officer must have sufficient facts to lead a resonable person to believe that an individual has violated immigration law before making arrest.

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

In my case there is absulutly no probable casue that lead to my detention or arrest. I still haven' been given a reson for my detention. I have follwed every requirement upto date and don't know why I am being detained.

(b) Did you present Ground Two in all appeals that were available to you?

Yes No

GROUND THREE: N/A

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

(b) Did you present Ground Three in all appeals that were available to you?

Yes No

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GROUND FOUR: N/A

(a) Supporting facts (*Be brief. Do not cite cases or law.*):

(b) Did you present Ground Four in all appeals that were available to you?

Yes No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

Request for Relief

15. State exactly what you want the court to do: Respectfully, I would like the court to order my release while i wait for my court hearings. The judge can then hear my case and rule accordingly.

I am a responsible, honest and reliable person who just wants the opportunity and due process granted to those whom enter this country legally.

I thank the court for the consideration of my petition.

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Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date:

10/21/2025

Albornoza A.

Signature of Petitioner

Signature of Attorney or other authorized person, if any