

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Candido ARCHUNDIA-LOPEZ, Yuridiana
ORNELAS ARRELANO, Pedro BECERRA
ELDIFONSO, Francisco FLORES
ARMENTA, Andres GONZALEZ-LARA,
Rufina del Carmen MARTINEZ-SANCHEZ,
Bonifacio MENDOZA MONTES, Cornelio
VASQUEZ OLIVEROS, and Fermin LARA
PALACIOS,

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. 2:26-cv-86

**PETITION FOR WRIT OF
HABEAS CORPUS**

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

FACTS

1. Petitioners Candido Archundia-Lopez, Yuridiana Ornelas Arrelano, Pedro Becerra Eldifonso, Francisco Flores Armenta, Andres Gonzalez-Lara, Rufina del Carmen Martinez-Sanchez, Bonifacio Mendoza Montes, Cornelio Vasquez Oliveros, and Fermin Lara Palacios bring this petition for a writ of habeas corpus to seek enforcement of their rights as members of the Bond Denial Class certified in *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. filed Mar. 20, 2025).¹

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

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

Petitioner Candido Archundia-Lopez

4. Petitioner Candido Archundia-Lopez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at Northwest ICE Processing Center (NWIPC) after being apprehended by U.S. Immigration and Customs Enforcement (ICE) on November 14, 2025, *see* Ex. A;²
- (b) entered the United States without inspection approximately thirty years ago and was not apprehended upon arrival; and

¹ The Bond Denial Class is comprised of “[a]ll noncitizens without lawful status detained at the Northwest ICE Processing Center [NWIPC] who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival, (3) are not or will not be subject 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).

² All exhibit citations are to the authenticating declaration of Amanda Ng filed contemporaneously with this petition.

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

5. After apprehending Mr. Archundia-Lopez on or around November 14, 2025, the Department of Homeland Security (DHS) placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Archundia-Lopez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. B.

6. On January 7, 2026, Immigration Judge (IJ) John Odell denied Mr. Archundia-Lopez's request for bond based on lack of jurisdiction and granted an alternative bond amount of \$10,000. Ex. C.

Petitioner Yuridiana Ornelas Arrelano

7. Petitioner Yuridiana Ornelas Arrelano is a member of the Bond Denial Class, as she:

(a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on December 2, 2025, Ex. D;

(b) last entered the United States without inspection over twenty years ago and was not apprehended upon arrival;

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

8. After apprehending Ms. Ornelas on or around December 2, 2025, DHS placed her in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. Ornelas as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. E.

9. On January 6, 2026, IJ Tammy Fitting denied Ms. Ornelas' request for bond based on lack of jurisdiction and granted an alternative bond amount of \$15,000. Ex. F.

Petitioner Pedro Becerra Eldifonso

10. Petitioner Pedro Becerra Eldifonso is a member of the Bond Denial Class, as he:

(a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on September 18, 2025, see Ex. G;

(b) last entered the United States without inspection over thirty years ago and was not apprehended upon arrival, see *id.*;

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

11. After apprehending Mr. Becerra on or around September 18, 2025, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged Mr. Becerra as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. G.

Petitioner Francisco Flores Armenta

12. Petitioner Francisco Flores Armenta is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on December 16, 2025, *see* Ex. H;
- (b) last entered the United States without inspection around twenty years ago and was not apprehended upon arrival;
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

13. After apprehending Mr. Flores, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Flores as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. I.

Petitioner Andres Gonzalez-Lara

14. Petitioner Andres Gonzalez-Lara is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on January 3, 2026, Gonzalez-Lara Decl. ¶¶ 2-4;
- (b) last entered the United States without inspection about twenty years ago and was not apprehended upon arrival, *id.* ¶ 2;
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

15. After apprehending Mr. Gonzalez-Lara on January 3, 2026, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Gonzalez-Lara as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. J.

Petitioner Rufina del Carmen Martinez-Sanchez

16. Petitioner Rufina del Carmen Martinez-Sanchez is a member of the Bond Denial Class, as she:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around January 3, 2026, Martinez-Sanchez Decl. ¶¶ 2–4;
- (b) last entered the United States without inspection over twenty-five years ago and was not apprehended upon arrival, *id.* ¶ 2;
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

17. After apprehending Ms. Martinez-Sanchez on January 3, 2026, DHS placed her in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. Martinez-Sanchez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Ex. K.

Petitioner Bonifacio Mendoza Montes

18. Petitioner Bonifacio Mendoza Montes is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on December 31, 2025, Mendoza Montes Decl. ¶¶ 2–4;
- (b) last entered the United States without inspection over fifteen years ago and was not apprehended upon arrival, *id.* ¶ 2;
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

19. After apprehending Mr. Mendoza Montes on December 31, 2025, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Mendoza Montes as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

Petitioner Cornelio Vasquez Oliveros

20. Petitioner Cornelio Vasquez Oliveros is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on November 10, 2025, Vasquez Decl. ¶¶ 2–4; Ex. L;
- (b) last entered the United States without inspection about three years ago and was not apprehended upon arrival, Vasquez Decl. ¶ 2;

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

2 21. After apprehending Mr. Vasquez on or around November 10, 2025, DHS placed
3 him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS
4 has charged Mr. Vasquez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone
5 who entered the United States without inspection. *See* Ex. L.

6 **Petitioner Fermin Lara Palacios**

7 22. Petitioner Fermin Lara Palacios is a member of the Bond Denial Class, as he:

8 (a) does not have lawful status in the United States and is currently detained at
9 NWIPC after being apprehended by DHS on December 11, 2025, *see* Ex. M;

10 (b) last entered the United States without inspection over fifteen years ago and
was not apprehended upon arrival, *see* Ex. N;

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

12 23. After apprehending Mr. Lara on or around December 11, 2025, DHS placed him
13 in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Lara as being
14 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States
15 without inspection. *See* Ex. N.

16 24. The Court should expeditiously grant this petition.

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

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

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

JURISDICTION & VENUE

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

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

PARTIES

30. Petitioner Candido Archundia-Lopez is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

31. Petitioner Yuridiana Ornelas Arrelano is currently detained at NWIPC. She is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

32. Petitioner Pedro Becerra Eldifonso is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

33. Petitioner Francisco Flores Armenta is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

34. Petitioner Andres Gonzalez-Lara is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

35. Petitioner Rufina del Carmen Martinez-Sanchez is currently detained at NWIPC. She is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

36. Petitioner Bonifacio Mendoza Montes is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

1 37. Petitioner Cornelio Vasquez Oliveros is currently detained at NWIPC. He is a
2 member of the Bond Denial Class certified in *Rodriguez Vazquez*.

3 38. Petitioner Fermin Lara Palacios is currently detained at NWIPC. He is a member
4 of the Bond Denial Class certified in *Rodriguez Vazquez*.

5 39. Respondent Laura Hermosillo is the Seattle Acting Field Office Director of ICE's
6 Enforcement and Removal Operation division. As Petitioners' immediate custodian, she is
7 responsible for Petitioners' detention and removal. She is named in her official capacity.

8 40. Respondent U.S. Department of Homeland Security (DHS) is the federal agency
9 responsible for implementing and enforcing the Immigration and Nationality Act (INA),
10 including the detention and removal of noncitizens.

11 41. Respondent Executive Office for Immigration Review (EOIR) is the federal
12 agency responsible for implementing and enforcing the INA in removal proceedings, including
13 for custody redeterminations in bond hearings.

14 42. Respondent Bruce Scott is employed by The Geo Group, Inc., as Warden of the
15 NWIPC, where Petitioners are detained. He has immediate physical custody of Petitioners. He is
16 sued in his official capacity.

17 **CLAIMS FOR RELIEF**

18 **Violation of the INA:**

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

20 43. Petitioners repeat, re-allege, and incorporate by reference each and every
21 allegation in the preceding paragraphs as if fully set forth herein.

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

24 45. The judgment in *Rodriguez Vazquez* makes clear that Respondents violate the
25 INA in applying the mandatory detention statute at § 1225(b)(2) to class members.
26
27

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

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

PRAYER FOR RELIEF

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

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

DATED this 9th day of January, 2026.

s/ Matt Adams

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