

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT

for the
Western District of Washington

Erick Adelmo Manroquin Aviles

Petitioner

v.

Case No. **2:26-cv-137 JHC**
(Supplied by Clerk of Court)

Respondent

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

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

Personal Information

- (a) Your full name: Erick Adelmo Manroquin Aviles

(b) Other names you have used: _____
- Place of confinement: _____

(a) Name of institution: Rio Grande Processing Center

(b) Address: 1001 San Rio Blvd
Laredo, TX 78046

(c) Your identification number: [REDACTED]
- Are you currently being held on orders by:

☒ Federal authorities ☐ State authorities ☐ Other - explain _____

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

BY _____ DEPUTY
- 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: [REDACTED]

(c) Date of sentencing: _____

☒ Being held on an immigration charge

☐ Other (explain): _____

Decision or Action You Are Challenging

- 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)

AO 242 (Rev. 09/17) Motion for a Writ of Habeas Corpus Under 28 U.S.C. § 2254

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: _____

II. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☒ Yes

☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 11/07/2025

(b) Date of the removal or reinstatement order: _____

(c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes

☒ No

AD-542 (Rev. 09/07) Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241

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: _____

NO. 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Grounds for Your Challenge to 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: I am requesting before the honorable judges of immigration, to hear my plea and give me the opportunity to be released on bail and pleading to stay in the United States as a legal citizen I am not a threat to escape from this country and I believe before this court I can be given a second chance.

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 Do not cite cases or law.):

Before I was detained, I had my process for immigration process started to be a legal citizen in this country, with an immigration lawyer, I was given my social security card and my work permit. I am also married to a legal citizen born in the US. I am requesting to stay with my family and the opportunity to continue my legal resident process. I worked in this country for nine years, paying my taxes and complying with state laws.

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

☒ Yes ☐ No

GROUND TWO: During the nine years that I have resided in United States I have a clean criminal record and have and I have not committed any crimes that put in danger any lawful resident of this country.

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

I have been employed in a stable job and have been the financial support of my wife and family member that depend on me. My family is the root of my foundation and for whom I have been working very hard in the state of Oklahoma where I have resided for five years complying with all the laws of the US.

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

☒ Yes ☐ No

GROUND THREE: Financial Certified Statements of my bank account

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

To support and show with all transparency information of my legal transactions and payments of my job. This a detail summary of my account number address and all legal financial proceedings.

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

☒ Yes ☐ No

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GROUND FOUR: Illegal Arbitrary Detention and prolonged of violation to my human rights.

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

I was taken without knowing the reasons of my detention, I was not presented with any legal order signed by a judge to be detained and taken in torment, scared and not allowed to communicate with my wife for 3 days. This improper handling led to physical, emotional and putting at risk my health leading me to having medical treatment, 3 days without proper hygiene and no communication after the detention I was moved to two more detention centers and was under the same cruelty.

(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: I am requesting my bail on the court date and the opportunity to stay in United states grounds, to serve this country as a legal citizen and continue with my immigration citizenship that was established before the ICE detention operation happened, to be treated fairly and be considered as a non criminal in this country. I want to stay with my wife and family. Thank you your honor.

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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: 1-4-26



Signature of Petitioner

Signature of Attorney or other authorized person, if any

Jacqueline Colon Sanchez

January 4, 2026

To Whom It May Concern:

I, Jacqueline Colon Sanchez, hereby certify that I have known Mr. Erick Adelmo Marroquin Aviles for four years. For the past two years, we have lived together as husband and wife, and eleven months ago we were married.

As Mr. Marroquin's wife, I can certify that he is a good man, respectful, a good father, a good husband, and a good friend. He is a good provider for our household. I can testify that Mr. Marroquin is the one who covers the majority of our household expenses. Therefore, Mr. Marroquin's absence from our home would represent a significant difficulty for me, both economically and emotionally. Economically, because I do not have all the necessary resources to support my household. And emotionally, because it would mean having to make a series of adjustments related to our housing and other necessary expenses to be able to survive in this country. And above all, because he is my husband and the person with whom I made a vow before God and men to be together always.

Mr. Erick Marroquin is a person who enjoys a very good reputation among all who know him. And I can attest that this is true. As a citizen and a man of faith, he is a helpful person, always willing to help others. He is committed to his family and his faith community, always giving a good testimony of himself as a person and a man of faith. He is a person loved by those who know him.

For this reason, I respectfully request that you grant him the opportunity to regularize his immigration status so that he can remain in this country with his family.

Thank you for your consideration of this matter. Please find my contact information above should you require any additional information about my husband.

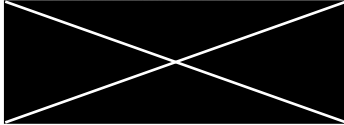
Sincerely,



Jacqueline Colon Sanchez



Juan Guaderrama



January 5, 2026

To Whom It May Concern:

This letter certifies that I have known Mr. Erick Adelmo Marroquin Aviles for five years. Approximately two years ago, Mr. Erick began working for my company and has continued to do so until the present. As an employee, I can say that he is an honest, hardworking, and diligent man. He is always willing to fulfill and perform his duties within my company.

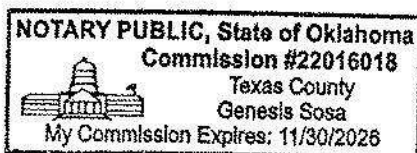
Within the community, as a citizen, he is an upright and helpful man. I can also say that he is a trustworthy person, committed to everything he sets out to do for himself, his family, and other citizens. As a man of faith, he enjoys an impeccable reputation both within and outside of his congregation.

For this reason, I respectfully request that you consider his immigration case. I believe that Mr. Erick Marroquin deserves an opportunity in this country. Without further ado, and should you require any additional information about Mr. Erick Marroquin Aviles, I am providing my personal contact information so that you may reach me.

Sincerely,

A handwritten signature in black ink, appearing to read 'JG' with a stylized flourish.

Juan Guaderrama



A handwritten signature in black ink, appearing to read 'Genesis Sosa'.

Bryant Montalvo



December 24, 2025

To Whom It May Concern:

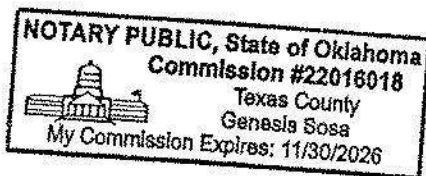
This letter is to confirm that I have known Mr. Erick Marroquin Aviles for approximately three years. During the time I have known Mr. Erick, he has proven to be an honest, hardworking, and trustworthy individual. I have observed that he is a man of integrity and faith.

Through this letter, I express my support and recommendation for Mr. Erick Marroquin in all matters related to his immigration process. I respectfully request that his case be given due consideration and that his petition to continue residing in the United States of America be granted.

My contact information is provided below should further information be required.

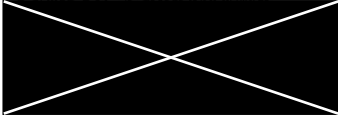
Sincerely,


Bryant Montalvo





Juan Jr. Gascarrama



December 29, 2025

To Whom It May Concern:

This letter certifies that I have known Mr. Erick Marroquin Aviles for approximately five years. During the time I have known Mr. Marroquin, I have observed that he is a man of integrity, honesty, and a good citizen. I can also say that he is a person who is always caring for and working hard for his family. He is kind, respectful, and helpful.

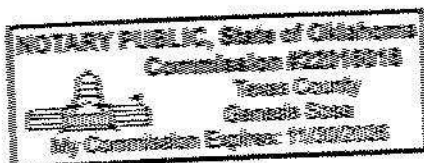
For this reason, I respectfully ask that you consider his immigration petition so that Mr. Erick Marroquin can continue contributing to our country.

Please feel free to contact me with any questions or if you require any further information regarding Mr. Erick Marroquin.

Sincerely,

Juan Jr. Gascarrama

A handwritten signature in black ink, appearing to read 'Juan Jr. Gascarrama'.



Genesis Sosa

Pastor: Refugio Villa
402 N James St
Guymon, OK 73942



December 23, 2025

To Whom It May Concern:

This letter is to respectfully recommend Erick Adelmo Marroquin Aviles, who was born on 
 and whom I have known for five years in my capacity as a pastor.

During the time I have known Mr. Erick, I have observed his strong moral character, honesty, and responsibility. He is a respectful, hardworking individual committed to his family and community. He has always demonstrated proper conduct and profound respect for others.

Mr. Erick has been a source of support for his family, both emotionally and financially. His absence has caused a significant burden for his loved ones, who depend on him. Furthermore, he is someone who always strives to do what is right and fulfill his responsibilities.

I can affirm with full confidence that Mr. Erick Adelmo Marroquin Aviles does not pose any risk to the community and deserves a fair opportunity to continue his immigration process. I believe that allowing him to pursue his case while at liberty would have a positive impact on both his family and the community at large.

I respectfully request that this letter be taken into consideration when evaluating the immigration situation of Mr. Erick Adelmo Marroquin Aviles.

Thank you in advance for your time and attention to this matter.

Sincerely,



Pastor Refugio Villa
Pastor of Conexion Hispana Church
1901 N Lelia St
Guymon, OK

