

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ERICK CABALLERO

A 
1623 E. J. STREET, Suite 5
TACOMA, WASHINGTON 98421



MAR 23 2026

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

Full name, address and prison number (if any)

Petitioner

vs. PAMELA BONDI U.S. ATTORNEY
GENERAL BRUCE SCOTT WARREN

Name of Respondent (person having custody
of petitioner)

Respondent

Civil Case No.: 2:26-cv-00990-JHC

(To be supplied by the Clerk of the District
Court)

A 
PETITION FOR
WRIT OF HABEAS CORPUS

UNDER 28 USC 2241

INSTRUCTIONS - READ CAREFULLY

This petition must be legibly handwritten or typewritten, signed by the petitioner, and verified under penalty of perjury before an authorized institutional officer. Any false statement of a material fact may serve as the basis for prosecution and conviction for perjury. All questions must be answered concisely in the proper place on the form. Where more room is needed to answer any question, insert an additional blank page and be sure to use the question number on the additional page.

No citation of authorities need be furnished. If briefs or arguments are submitted, they should be submitted in the form of a separate memorandum.

Upon receipt of a fee of \$5.00 your petition will be filed if it is in proper order. When the form is completed, the original and two copies should be mailed to the Clerk of the US District Court for the Western District of Washington, at Seattle or Tacoma.

If you do not have the necessary filing fee, you may request permission to proceed in forma pauperis, in which event you must execute the affidavit on the last page, setting forth information establishing your inability to prepay the fees and costs or give security therefore. You must also

have an authorized officer at the institution complete the certificate as to the amount of money and securities on deposit to your credit in any account in the institution. If your account exceeds \$100.00, you must pay the filing fee.

1. Place of detention NORTHWEST ICE Detention Center
1623 E. J. Street, Suite 5, Tacoma, WA 98421
2. Name and location of court and name of judge who imposed sentence: IMMIGRATION Court
AT TACOMA, 1623 E. J. Street, TACOMA, WASHINGTON 98421
3. The indictment number or numbers (if known) upon which, and the offenses for which, sentence was imposed:
 - a. A- [REDACTED]
 - b. N/A
 - c. N/A
4. The date upon which sentence was imposed and the terms of the sentence:
 - a. N/A
 - b. N/A
 - c. N/A
5. Check whether a finding of guilty was made:
 - a. After a plea of guilty N/A
 - b. After a plea of not guilty N/A
 - c. After a plea of nolo contendere N/A
6. If you were found guilty after a plea of not guilty, check whether that finding was made by:
 - a. A jury N/A
 - b. A judge without a jury N/A
7. Did you appeal from the judgment of conviction or the imposition of sentence?

N/A

8. If you answered "yes" to (7), list:

a. The name of each court to which you appealed:

i. N/A

ii. N/A

iii. N/A

b. The result in each court to which you appealed:

i. N/A

ii. N/A

iii. N/A

c. The date of each result:

i. N/A

ii. N/A

iii. N/A

d. If known, citations of any written opinions or orders entered pursuant to such results:

i. N/A

ii. N/A

iii. N/A

9. State concisely the grounds on which you base your allegation that you are being held in custody unlawfully.

a. Indefinite detention, without a WARRANT signed by a Federal Judge with attached certified Affidavit of Probable Cause. Since 9/21/2025, I have been detained at ICE.

b. Violation of procedural right of Due Process having never been in front of ANY Judge since 9/21/2025.

c. violation of my Constitutional protection of Liberty interest.

10. State concisely and in the same order the facts which support each of the grounds set out in (9):

a. Indefinite Arrest - violation of the 5th Amendment of the U.S. Constitution, illegal arrest, cruel and unusual punishment - violation of the 8th Amendment of the U.S. Constitution

b. Due Process - protections - violation of the 5th, 13th, 14th, Amendment of the U.S. Constitution

c. Liberty Interest - violation of the 5th, 13th, 14th, 8th, Amendments of the U.S. Constitution.

11. Have you previously filed petitions for habeas corpus, motions under section 2255 of Title 28, United States Code, or any other applications, petitions, or motions with respect to this conviction?

N/A

12. If you answered "yes" to (11), list with respect to each petition, motion, or application:

a. The specific nature thereof:

i.

N/A

ii.

N/A

iii.

N/A

b. The name and location of the court in which each was filed:

i.

N/A

ii. N/A

iii. N/A

c. The disposition thereof:

i. N/A

ii. N/A

iii. N/A

d. The date of each such disposition:

i. N/A

ii. N/A

iii. N/A

e. If known, citations of any written opinions or orders entered pursuant to each such disposition:

i. N/A

ii. N/A

iii. N/A

13. If you did not file a motion under section 2255 of Title 28, United States Code, or if you filed such a motion and it was denied, state why your remedy by way of such motion is inadequate or ineffective to test the legality of your detention:

a. N/A

b. N/A

c. N/A

14. Has any ground set forth in (9) been previously presented to this or any other federal court by way of petition for habeas corpus, motion under 2255 of Title 28, United States Code, or any other petition, motion, or application?

N/A

15. If you answered "yes" to (14), identify:

a. Which grounds have been previously presented:

i. N/A

ii. N/A

iii. N/A

b. The proceedings in which each ground was raised:

i. N/A

ii. N/A

iii. N/A

16. Were you represented by an attorney at any time during the course of:

a. Your arraignment and plea? N/A

b. Your trial, if any? N/A

c. Your sentencing? N/A

d. Your appeal, if any, from the judgment of conviction or the imposition of sentence? N/A

e. Preparation, presentation, or consideration of any petitions, motions, or applications with respect to this conviction, which you filed?

17. If you answered "yes" to one or more parts of (16), list;

a. The name of address of each attorney who represented you:

- i. N/A
- ii. N/A
- iii. N/A

b. The proceedings at which each such attorney represented you:

- i. N/A
- ii. N/A
- iii. N/A

18. If you are seeking leave to proceed in forma pauperis, have you completed the sworn affidavit setting forth the required information (see instructions, page 1 of the form)?

See: FINANCIAL AFFIDAVIT - ATTACHED

By: Erick Caballero
Signature of Petitioner
ERICK CABALLERO

State of Washington)
County of PIERCE) as

ERICK CABALLERO, being first sworn under oath, presents that he/she has subscribed to the foregoing petition and does state that the information therein is true and correct to the best of his/her knowledge and belief.

BY: Edward E. Todorov

Signature of Affiant

SUBSCRIBED and SWORN to
before me this 11th day of
MARCH, 2026
(month) (year)



Mark Malmoe

Notary Public (or other official authorized by law to administer oaths)

Office of Enforcement and Removal
Operations
Seattle Field Office
U.S. Department of Homeland Security
1623 East J Street, Suite 2
Tacoma, Washington 98421



**U.S. Immigration
and Customs
Enforcement**

CABALLERO, Erick Enrique

C/O NWIPC
1623 East J Street
Tacoma, WA 98421

Notice to Alien of File Custody Review

You are detained in the custody of U.S. Immigration and Customs Enforcement (ICE) and you are required to cooperate with ICE in effecting your removal from the United States. If ICE has not removed you from the United States within the removal period as set forth in INA 241(a) (normally 90-days of either: 1) your entering ICE custody with a final order of removal, deportation or exclusion; or 2) the date of any final order you receive while you are in ICE custody), ICE's Deciding Official will review your case for consideration of release on an Order of Supervision. Release, however, is dependent on your demonstrating to the satisfaction of the Attorney General that you will not pose a danger to the community and will not present a flight risk.

Your custody status will be reviewed on or about: **December 17, 2025**. The Deciding Official may consider, but is not limited to considering the following:

1. Criminal convictions and criminal conduct;
2. Other criminal and immigration history;
3. Sentence(s) imposed and time actually served;
4. History of escapes, failures to appear for judicial or other proceedings, and other defaults;
5. Probation history;
6. Disciplinary problems while incarcerated;
7. Evidence of rehabilitative effort or recidivism;
8. Equities in the United States;
9. Cooperation in obtaining your travel document.
10. Any available mental health reports.

You may submit any documentation you wish to be reviewed in support of your release, prior to the date listed above, to the attention of the Officer and address below. English translations must be provided pursuant to 8 CFR 103.2(b)(3). An attorney or other person may submit materials on your behalf. The deciding official will notify you of the decision in your case.

U.S. Department of Homeland Security
Immigration and Customs Enforcement
Enforcement and Removal Operations
Attn: Post Order Custody Review Unit
1623 East J St.
Tacoma, WA 98421-1615