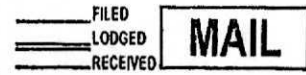


UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON



APR 13 2026

YOHAN ANTONIO AGUILAR-GRATEROL)

A/ 

Petitioner,

Vs.

WARDEN / FACILITY ADMINISTRATOR,)

Northwest Detention Center,

Respondent.

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

Case No. 2:26-CV-00997-LK

PETITIONER'S REPLY TO RESPONDENT'S RETURN
IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

Petitioner, Yohan Antonio Aguilar-Graterol, respectfully submits this Reply to Respondent's Return in opposition to the Petition for Writ of Habeas Corpus.

I. INTRODUCTION

Respondent's opposition to the Petition for Writ of Habeas Corpus fails both legally and factually. It rests on unverified, internally inconsistent, and unreliable allegations—principally an unsupported claim of gang affiliation—while failing to provide the constitutionally required procedural safeguards necessary to justify Petitioner's continued detention.

At its core, this case presents a clear and fundamental violation of the Due Process Clause of the Fifth Amendment. Petitioner remains deprived of his liberty based on allegations that are neither corroborated by reliable evidence nor subjected to any meaningful adversarial testing. Despite the severity of the accusations, Respondent has failed to produce objective, verifiable proof establishing that Petitioner poses any danger to the community or risk of flight.

Equally concerning, Respondent's position is undermined by material inconsistencies within its own records. While asserting grounds for continued detention, the government simultaneously relies on information that conflicts with Petitioner's documented immigration history, including evidence of pending proceedings and lawful processing. These contradictions further erode the credibility of the basis for detention.

Moreover, Respondent relies on exhibits that have not been made available to Petitioner, depriving him of a meaningful opportunity to review and challenge the evidence against him. This alone raises serious constitutional concerns, as due process requires that a detainee be afforded a fair and meaningful opportunity to contest the factual basis of his confinement.

The record, by contrast, affirmatively demonstrates that Petitioner has no criminal history, maintains strong family and community ties within the United States, and has complied with all applicable requirements. Far from supporting continued detention, the evidence establishes that Petitioner is neither a danger nor a flight risk.

Federal courts—including within this District—have consistently held that immigration detention cannot be sustained on the basis of speculative, uncorroborated, or unreliable allegations, nor in the absence of meaningful procedural safeguards. Respondent's position fails under these well-established principles.

Accordingly, and for the reasons set forth below, the Court should grant the Petition for Writ of Habeas Corpus and order Petitioner's immediate release, or, at a minimum, require a prompt and constitutionally adequate individualized custody determination.

II. GOVERNING LEGAL PRINCIPLES

A petition for writ of habeas corpus under 28 U.S.C. § 2241 is the proper vehicle to challenge the legality of immigration detention. See *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001).

Noncitizens in immigration custody are entitled to the protections of the Due Process Clause of the Fifth Amendment, which prohibits the federal government from depriving any person of liberty without due process of law. *Id.* at 690.

Although Congress has authorized certain forms of immigration detention, such authority is not unlimited. Detention must remain consistent with constitutional constraints, and it may not be arbitrary, indefinite, or unsupported by adequate procedural safeguards. See *Jennings v. Rodriguez*, 583 U.S. 281, 301 (2018).

At a minimum, due process requires that civil detention be supported by reliable evidence and accompanied by meaningful procedural protections, including the opportunity to challenge the factual basis of detention before a neutral and impartial decisionmaker.

Courts evaluating due process claims in the context of immigration detention apply the balancing test set forth in *Mathews v. Eldridge*, 424 U.S. 319 (1976), which considers: (1) the private interest affected; (2) the risk of erroneous deprivation through the procedures used; and (3) the government's interest.

Under this framework, the private interest at stake—freedom from physical restraint—is of the highest order. *Zadvydas*, 533 U.S. at 690.

The risk of erroneous deprivation is particularly acute where detention is based on unverified, uncorroborated, or internally inconsistent information, or where the detainee is denied a meaningful opportunity to review and contest the evidence against him.

Finally, while the government has an interest in ensuring compliance with immigration proceedings and protecting the community, that interest does not justify detention absent an individualized determination supported by reliable evidence.

Consistent with these principles, federal courts have repeatedly held that continued immigration detention violates due process where it is not supported by sufficient evidence, lacks an individualized assessment, or is imposed without meaningful procedural safeguards.

Accordingly, the Constitution requires that detention be justified by reliable evidence and accompanied by procedures that meaningfully reduce the risk of erroneous deprivation of liberty.

III. RESPONDENT'S POSITION FAILS AS A MATTER OF LAW

Respondent's opposition fails as a matter of law because it does not satisfy the constitutional requirements governing civil immigration detention.

Even assuming, *arguendo*, that Respondent's factual allegations were accurate—which they are not—Respondent's position still fails because it does not establish that Petitioner's continued detention is supported by reliable evidence or accompanied by constitutionally adequate procedural safeguards.

Civil immigration detention is subject to the limitations of the Due Process Clause. As the Supreme Court has made clear, detention must be reasonably related to legitimate governmental objectives and must be implemented through procedures that meaningfully reduce the risk of erroneous deprivation of liberty. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Mathews v. Eldridge*, 424 U.S. 319 (1976).

Respondent's position fails under this standard for multiple independent reasons.

First, Respondent does not identify any reliable, objective evidence establishing that Petitioner poses a danger to the community or a risk of flight. Instead, Respondent relies on generalized assertions and untested allegations, which are insufficient as a matter of law to justify continued detention.

Second, Respondent fails to demonstrate that Petitioner has been afforded any meaningful procedural protection. There has been no individualized custody determination in which Petitioner was given a fair opportunity to challenge the factual basis of his detention before a neutral decisionmaker.

Third, Respondent relies on materials that have not been made available to Petitioner, thereby depriving him of the ability to meaningfully respond. Due process requires that a detainee be given a fair opportunity to review and contest the evidence against him; reliance on undisclosed materials is incompatible with that requirement.

Fourth, Respondent's position is undermined by internal inconsistencies in its own records, further demonstrating that the basis for detention is unreliable and insufficient to support continued deprivation of liberty.

Taken together, these deficiencies are dispositive. Even if Respondent's allegations were credited, the absence of reliable evidence and meaningful procedural safeguards renders Petitioner's continued detention unconstitutional as a matter of law.

Accordingly, Respondent's opposition must be rejected.

IV. RESPONDENT RELIES ON UNVERIFIED AND UNCORROBORATED ALLEGATIONS

Respondent's justification for Petitioner's continued detention rests almost entirely on unverified, uncorroborated, and inherently unreliable allegations—most notably, an unsupported claim of purported gang affiliation. As a matter of law, such allegations are insufficient to justify the continued deprivation of liberty.

The government bears the burden of demonstrating that civil detention is justified. That burden cannot be satisfied through speculation, conclusory assertions, or untested allegations. Due process requires reliable, objective evidence—not conjecture.

Here, Respondent has failed to meet that burden.

Respondent does not identify any credible evidence establishing that Petitioner is, or has ever been, affiliated with any criminal organization. There is no criminal conviction, no arrest record, no corroborated intelligence, and no reliable documentation supporting such a claim. The absence of such evidence is dispositive.

To the contrary, Petitioner submits additional evidence with this Reply further confirming the absence of any criminal history, including official certification of criminal background reflecting no criminal record. This evidence directly contradicts Respondent's allegations and highlights their lack of factual foundation.

Respondent's reliance on unverified allegations is particularly troubling given the severe stigma and consequences associated with claims of gang affiliation. Allowing continued detention based on such unsupported assertions would effectively permit the government to deprive individuals of liberty based on unsubstantiated labels alone—an outcome incompatible with the Constitution.

Courts have consistently rejected attempts to justify detention based on speculative or uncorroborated claims of criminal or gang affiliation. Where the government fails to produce reliable evidence linking a detainee to criminal conduct, continued detention cannot be sustained.

Additionally, Petitioner provides a consistent and credible explanation regarding any physical markings or tattoos that could be misinterpreted. There is no evidence—direct or circumstantial—linking such characteristics to any criminal organization. Reliance on superficial or speculative indicators, absent corroboration, is inherently unreliable and legally insufficient.

Compounding these deficiencies, Respondent relies on materials that have not been made available to Petitioner, further depriving him of any meaningful opportunity to challenge the allegations. The use of undisclosed or inaccessible evidence further undermines the reliability of Respondent's position and raises serious due process concerns.

In sum, Respondent's position rests not on evidence, but on speculation. The absence of corroboration, the existence of affirmative evidence demonstrating no criminal history, and the reliance on undisclosed materials render Respondent's allegations legally insufficient.

Accordingly, Respondent has failed to meet its burden, and its reliance on unverified and uncorroborated allegations cannot justify Petitioner's continued detention as a matter of law.

V. GOVERNMENT RECORDS ARE INTERNALLY INCONSISTENT AND UNRELIABLE

Respondent's position is independently defective because it relies on government records that are materially inconsistent, internally contradictory, and therefore unreliable as a matter of law.

When the government seeks to deprive an individual of liberty, it bears the burden of ensuring that the information upon which it relies is accurate, consistent, and trustworthy. Detention cannot be justified on the basis of records that are themselves demonstrably flawed. Where the government's own records are inconsistent, the foundation for continued detention collapses.

Here, Respondent's records contain material inaccuracies regarding Petitioner's immigration history and procedural posture. Government records have indicated that Petitioner has no pending immigration proceedings or applications. That assertion is demonstrably incorrect.

Petitioner has an active asylum application pending before the Immigration Court, has sought employment authorization, and has been issued a Social Security number in connection with his ongoing immigration process. These are objective, verifiable facts that directly contradict Respondent's representations.

Such contradictions are not trivial. They go to the core reliability of the government's evidence. If the government cannot accurately represent whether Petitioner has pending proceedings, it cannot credibly assert conclusions about his status, risk, or alleged conduct.

This is not a minor clerical issue—it is a structural defect in the evidentiary basis for detention.

The Due Process Clause does not permit continued deprivation of liberty based on inaccurate or internally inconsistent information. Where the government's records are unreliable, the risk of erroneous deprivation is unacceptably high, and detention cannot be sustained.

These inconsistencies are particularly significant when considered alongside Respondent's reliance on unverified allegations of gang affiliation. The government's case is thus doubly deficient: it rests both on unsupported allegations and on records that are themselves unreliable.

Together, these defects demonstrate a systemic failure to provide a reliable factual basis for detention. Under *Mathews v. Eldridge*, the risk of erroneous deprivation in such circumstances is extreme and constitutionally intolerable.

Courts have consistently rejected detention decisions grounded in inaccurate, incomplete, or contradictory information. The Constitution requires more than administrative inconsistency and unverified assertions—it requires reliability. Respondent has failed to provide it.

These defects rise to the level of a clear violation of the Due Process Clause of the Fifth Amendment. The Constitution does not permit the government to deprive an individual of liberty based on information that is materially inaccurate, internally inconsistent, or demonstrably unreliable.

Where, as here, detention is premised on flawed records and unsupported assertions, the resulting deprivation of liberty is not merely erroneous—it is unconstitutional.

The Fifth Amendment requires more. It requires accuracy, reliability, and a meaningful opportunity to be heard. Respondent has provided none.

Accordingly, Respondent's reliance on internally inconsistent and unreliable records renders Petitioner's continued detention unlawful as a matter of law.

VI. PETITIONER'S DETENTION IS PROLONGED, INDETERMINATE, AND UNREASONABLE

Petitioner's continued detention is prolonged, indeterminate, and unreasonable, and therefore violates the Due Process Clause of the Fifth Amendment.

Although immigration detention may be permissible in limited circumstances, it becomes unconstitutional when it is excessive, open-ended, or no longer reasonably related to its purported purpose. Civil detention must remain narrowly tethered to legitimate governmental objectives and must be implemented within constitutional limits. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

Here, Petitioner has been detained for a sustained period without any individualized determination supported by reliable evidence, and without any meaningful procedural safeguards. The government has failed to demonstrate that continued detention is necessary to achieve any legitimate objective.

Critically, Petitioner's immigration proceedings are actively moving forward, with a final individual hearing scheduled for April 28, 2026. This fact alone undermines any claim that detention is necessary to ensure compliance with proceedings. Petitioner is engaged in the adjudication of his case through established legal channels, and there is no indication that detention meaningfully advances that process.

Under these circumstances, continued detention no longer serves its stated purpose. Instead, it imposes an unnecessary and excessive deprivation of liberty that is not reasonably related to any legitimate governmental interest.

Moreover, Petitioner's detention is effectively indeterminate. There is no clear endpoint, no defined mechanism ensuring periodic review, and no procedural safeguard that would prevent continued confinement based on unsupported or unreliable allegations. Such open-ended detention is precisely the type of restraint the Supreme Court has cautioned against.

Where detention is not meaningfully tied to its purpose, it becomes arbitrary. Civil immigration detention cannot be used as a default or preventive measure absent individualized justification supported by reliable evidence.

Courts have consistently held that prolonged and indeterminate detention, particularly where it is not accompanied by meaningful procedural safeguards, violates due process. That principle applies with full force here.

Accordingly, Petitioner's continued detention is prolonged, indeterminate, and unreasonable, and cannot be sustained under the Fifth Amendment.

VII. THE ABSENCE OF A CONSTITUTIONALLY ADEQUATE HEARING IS DISPOSITIVE

The absence of a constitutionally adequate hearing is not merely a procedural deficiency—it is a dispositive constitutional violation that renders Petitioner's continued detention unlawful.

The Fifth Amendment categorically prohibits the deprivation of liberty without due process of law. At a minimum, due process requires that the government justify continued civil detention through a fair, individualized determination based on reliable evidence, conducted before a neutral and impartial decisionmaker.

That has not occurred here.

Petitioner has been detained without ever being afforded a constitutionally adequate hearing at which the government was required to meet its burden. There has been no proceeding in which Respondent was required to present reliable evidence, no opportunity for Petitioner to meaningfully challenge the allegations against him, and no neutral adjudicator to evaluate the necessity of continued detention.

This is not a minor procedural omission—it is a structural constitutional defect.

The Supreme Court has made clear that due process requires procedures that meaningfully reduce the risk of erroneous deprivation of liberty. *Mathews v. Eldridge*, 424 U.S. 319 (1976). Under that framework, all factors weigh overwhelmingly in Petitioner's favor.

First, the private interest at stake—freedom from physical restraint—is of the highest constitutional magnitude.

Second, the risk of erroneous deprivation in this case is extraordinarily high. Respondent's position is based on unverified allegations, internally inconsistent records, and evidence that has not been disclosed to Petitioner. Without a meaningful hearing, there is no mechanism to test the accuracy of these assertions, making erroneous detention not just possible, but likely.

Third, the government's interest does not justify the absence of procedural safeguards. Requiring an individualized hearing imposes minimal administrative burden, particularly when weighed against the fundamental liberty interest at stake.

Under these circumstances, due process requires, at a minimum, an individualized custody determination at which the government bears the burden of justifying detention through reliable evidence.

Respondent has provided none.

The government cannot detain an individual first and justify that detention later—or worse, not at all. Continued detention without a meaningful opportunity to be heard is the very definition of arbitrary confinement prohibited by the Constitution.

Courts have consistently held that where a detainee is denied a constitutionally adequate hearing, continued detention cannot be sustained. The absence of such a hearing is dispositive.

Accordingly, Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment and warrants immediate habeas relief.

VIII. RESPONDENT HAS FAILED TO PROVIDE ANY INDIVIDUALIZED JUSTIFICATION FOR DETENTION

Respondent's position fails for the independent and dispositive reason that it provides no individualized justification for Petitioner's continued detention.

The Constitution does not permit civil detention based on generalized assumptions, categorical determinations, or unexamined allegations. Rather, the Due Process Clause of the Fifth Amendment requires a particularized showing that detention is necessary in the individual case, supported by reliable evidence and grounded in specific, articulable facts.

That showing is entirely absent here.

Respondent has not identified any individualized basis demonstrating that Petitioner poses a danger to the community or a risk of flight. Instead, Respondent relies on conclusory assertions, unverified allegations, and internally inconsistent records that fail to address Petitioner's actual circumstances.

This is legally insufficient.

The government bears the burden of justifying continued detention. That burden requires more than speculation, unsupported labels, or administrative convenience. It requires a reasoned, evidence-based determination that detention is necessary in light of the individual's specific characteristics and circumstances.

Respondent has made no such determination.

The record affirmatively establishes that Petitioner has no criminal history, maintains strong and documented ties to the community, and is actively pursuing relief through ongoing immigration proceedings. Petitioner has provided substantial evidence of community support, including multiple affidavits, as well as objective documentation confirming his lawful participation in the immigration process.

Additionally, Petitioner has a scheduled individual hearing before the Immigration Court on April 28, 2026, further demonstrating his ongoing engagement with the legal process and undermining any suggestion of flight risk.

Respondent has not meaningfully addressed any of these facts. There has been no attempt to weigh Petitioner's individual circumstances, no evaluation of less restrictive alternatives, and no explanation as to why continued detention is necessary despite the absence of any criminal history or demonstrated risk.

Instead, Respondent's position reflects precisely the type of categorical and unsupported detention that the Constitution forbids.

This failure is not merely evidentiary—it is constitutional. Detention without individualized justification is arbitrary by definition and violates the Due Process Clause.

Courts have consistently held that where the government fails to provide a particularized and evidence-based justification for detention, continued confinement cannot be sustained.

Here, Respondent has offered none.

Accordingly, Petitioner's continued detention is unlawful and warrants immediate habeas relief.

IX. PETITIONER POSES NO DANGER AND NO FLIGHT RISK

The record affirmatively establishes that Petitioner poses neither a danger to the community nor a risk of flight. Respondent has failed to produce any reliable, individualized evidence to support either conclusion.

With respect to dangerousness, there is a complete absence of evidence demonstrating that Petitioner has engaged in criminal conduct or poses any threat to public safety. Petitioner has no criminal history—no arrests, no charges, and no convictions—and there is no credible evidence linking him to any criminal organization.

This absence of criminal history is not merely probative; it is highly dispositive. In the context of civil immigration detention, dangerousness must be supported by reliable, particularized evidence. Unsupported allegations, especially those lacking corroboration and contradicted by objective documentation, are insufficient as a matter of law.

Respondent's reliance on speculative or unverified claims of gang affiliation does not satisfy its burden. Courts have consistently rejected attempts to justify detention based on conjecture or unsubstantiated assertions of criminal activity. Without reliable evidence establishing actual dangerousness, continued detention cannot be sustained.

The same is true with respect to flight risk.

The record demonstrates that Petitioner has significant and well-documented ties to the United States, including a spouse and minor child who depend on him both economically and

emotionally. He has established community connections, including employment and support from members of his community, as reflected in multiple sworn affidavits.

In addition, Petitioner is actively engaged in his immigration proceedings and has a scheduled individual hearing before the Immigration Court on April 28, 2026. This fact strongly undermines any suggestion that he intends to evade the legal process. To the contrary, Petitioner has every incentive to appear and pursue relief through lawful channels.

There is no evidence that Petitioner has ever failed to comply with any legal obligation or court directive. Nor has Respondent identified any individualized factor suggesting that Petitioner presents a risk of nonappearance.

Respondent's position thus rests not on evidence, but on generalized assumptions and speculation. That is insufficient. The government bears the burden of demonstrating that detention is necessary, and it cannot meet that burden through conjecture.

Where, as here, the record affirmatively demonstrates the absence of both dangerousness and flight risk, continued detention lacks any lawful or constitutional basis.

Accordingly, Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment and warrants immediate habeas relief.

X. CONTROLLING AND PERSUASIVE AUTHORITY CONFIRMS THAT DETENTION IS UNLAWFUL

Controlling and persuasive authority confirm that Petitioner's continued detention is unlawful under the Due Process Clause of the Fifth Amendment.

The Supreme Court has long recognized that freedom from physical restraint lies at the core of the liberty protected by the Due Process Clause. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Accordingly, civil immigration detention is constitutionally permissible only within carefully defined limits and must remain reasonably related to its legitimate purpose.

In *Jennings v. Rodriguez*, the Court reaffirmed that statutory authorization for detention does not eliminate constitutional constraints. 583 U.S. 281, 301 (2018). Even where detention is authorized by statute, it remains subject to the fundamental requirements of due process.

Courts evaluate whether detention comports with due process under the framework set forth in *Mathews v. Eldridge*, 424 U.S. 319 (1976), which requires balancing the private interest at stake, the risk of erroneous deprivation, and the government's interest. This framework has been consistently applied in the immigration detention context, including within this District.

Courts in the Western District of Washington have repeatedly recognized that continued detention cannot be sustained where it is not supported by reliable evidence or adequate procedural safeguards.

In *Nguyen v. Bondi*, No. 2:25-cv-02723 (W.D. Wash. Jan. 23, 2026), the court confirmed that habeas relief is available to challenge unlawful immigration detention and ordered release where due process requirements were not satisfied.

Similarly, in *Francisco Diego Francisco v. Noem*, No. 2:26-cv-00025 (W.D. Wash. 2026), the court held that detention could not be sustained where adequate procedural protections were lacking and the risk of erroneous deprivation of liberty was significant.

More recently, in *Abraham v. Noem*, No. 2:26-cv-00823 (W.D. Wash. 2026), the court applied the Mathews framework and reaffirmed that immigration detention must be supported by sufficient procedural safeguards to satisfy constitutional requirements.

Likewise, in *Caisa Telenchana v. Hermosillo*, Case No. 2:26-cv-00363-GJL (W.D. Wash. Mar. 12, 2026), the court reaffirmed that continued detention must be supported by constitutionally adequate procedures and cannot be sustained where such safeguards are lacking.

These decisions reflect a consistent principle: immigration detention cannot be justified where it is based on unreliable evidence, lacks individualized justification, or is imposed without meaningful procedural safeguards.

That principle applies directly here.

As demonstrated throughout this Reply, Respondent's position rests on unverified allegations, internally inconsistent records, and undisclosed materials. Petitioner has been denied a meaningful opportunity to challenge the basis of his detention, and no individualized determination has been made.

Under controlling Supreme Court precedent and consistent authority within this District, such detention cannot be sustained.

Accordingly, controlling and persuasive authority confirm that Petitioner's continued detention is unlawful, and habeas relief is warranted.

XI. APPLICATION OF MATHEWS COMPELS RELIEF

Application of the balancing test set forth in *Mathews v. Eldridge*, 424 U.S. 319 (1976), overwhelmingly compels the conclusion that Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment.

Under Mathews, courts consider: (1) the private interest affected; (2) the risk of erroneous deprivation under the procedures used; and (3) the government's interest. Each factor weighs heavily—and decisively—in Petitioner's favor.

First, the private interest at stake—freedom from physical restraint—is of the highest constitutional magnitude. The Supreme Court has repeatedly emphasized that civil detention implicates a fundamental liberty interest requiring heightened procedural protections. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

Second, the risk of erroneous deprivation in this case is extraordinarily high. Respondent's position is based on unverified allegations, internally inconsistent records, and evidence that has not been disclosed to Petitioner. In the absence of a constitutionally adequate hearing, there is no mechanism—none—to test the accuracy, reliability, or credibility of these assertions.

This is not merely a heightened risk of error; it is an unmitigated and constitutionally intolerable risk of wrongful detention.

Third, the government's interest does not justify the absence of procedural safeguards. While the government has a legitimate interest in ensuring compliance with immigration proceedings, that interest does not permit detention based on speculation, unsupported allegations, or unreliable records.

Requiring an individualized custody determination imposes minimal administrative burden, particularly when weighed against the severe and ongoing deprivation of liberty at issue.

Where, as here, the private interest is fundamental, the risk of error is extreme, and the government has failed to provide meaningful procedural protections, due process requires relief as a matter of law.

Respondent has failed to satisfy any of the Mathews factors.

Accordingly, Petitioner's continued detention is constitutionally indefensible and cannot be sustained.

XII. CONTINUED DETENTION IS ARBITRARY AND UNCONSTITUTIONAL

Petitioner's continued detention is arbitrary, excessive, and unconstitutional in violation of the Due Process Clause of the Fifth Amendment.

Civil immigration detention is permissible only insofar as it remains reasonably related to legitimate governmental objectives and is implemented through constitutionally adequate procedures. When detention is no longer supported by reliable evidence, individualized justification, or meaningful procedural safeguards, it ceases to be lawful and becomes arbitrary.

That is precisely the case here.

As demonstrated throughout this Petition and Reply, Respondent's position rests on unverified allegations, internally inconsistent records, and undisclosed materials that have not been subjected to any meaningful adversarial testing. Petitioner has been denied a constitutionally adequate hearing, and no individualized determination has been made to justify continued detention.

Under these circumstances, detention is not meaningfully tethered to any legitimate governmental purpose. It does not advance compliance with immigration proceedings, particularly where Petitioner is actively pursuing relief and has a scheduled individual hearing before the Immigration Court on April 28, 2026. Instead, detention operates as an unjustified and excessive deprivation of liberty.

Moreover, the arbitrary and excessive nature of Petitioner's detention is further exacerbated by the conditions under which it has been imposed. Petitioner has been subjected to degrading and coercive treatment during detention, including forced strip searches, compelled physical exercises while unclothed, and exposure to water during nighttime detention procedures.

While Petitioner does not assert a separate conditions-of-confinement claim in this proceeding, such treatment is directly relevant to the constitutional analysis. The Due Process Clause prohibits not only unlawful detention, but also arbitrary and excessive deprivation of liberty.

When detention is both unsupported by reliable evidence and carried out under degrading conditions, the constitutional violation is compounded. These conditions underscore the severity of the deprivation at issue and further demonstrate that Petitioner's continued detention is not reasonably related to any legitimate governmental objective.

The Constitution does not permit the government to detain an individual under such circumstances—where the factual basis is unreliable, the procedures are deficient, and the conditions of confinement further aggravate the deprivation of liberty.

Taken together, these defects establish that Petitioner's continued detention is not merely unsupported—it is constitutionally arbitrary and excessive.

Accordingly, Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment and warrants habeas relief.

XIII. REQUEST FOR RELIEF

For the foregoing reasons, Petitioner respectfully submits that his continued detention violates the Due Process Clause of the Fifth Amendment and that he is entitled to habeas relief as a matter of law.

Accordingly, Petitioner respectfully requests that this Court:

- A. GRANT the Petition for Writ of Habeas Corpus and order Petitioner's immediate release from custody;**
- B. DECLARE that Petitioner's continued detention is unconstitutional;**
- C. In the alternative, ORDER a prompt and constitutionally adequate individualized custody hearing before a neutral decisionmaker, at which Respondent bears the burden of justifying continued detention through reliable, individualized evidence.**
- D. GRANT such other and further relief as the Court deems just and proper.**

XIV. CONCLUSION

For the foregoing reasons, Petitioner respectfully submits that his continued detention violates the Due Process Clause of the Fifth Amendment and cannot be sustained.

The record demonstrates that Respondent's position is unsupported by reliable evidence, undermined by internal inconsistencies, and imposed without constitutionally adequate procedural safeguards. Petitioner has been deprived of his liberty without a lawful or individualized justification.

Under these circumstances, continued detention is unconstitutional.

Accordingly, the Court should grant the Petition for Writ of Habeas Corpus and order Petitioner's immediate release, or, in the alternative, require a prompt and constitutionally adequate individualized custody determination.

Executed on April 10, 2026, at Tacoma, Washington.

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A# 
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