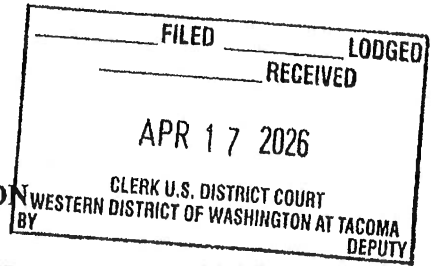


UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON



JESUS ALEXANDER ZAMORA MOLINA)
A#)

Petitioner,)

Vs.)

WARDEN / FACILITY ADMINISTRATOR)
Northwest Processing Center)

Respondent)

Case No. 2:26-cv-01078-KKE

PETITIONER'S REPLY
(TRAVERSE) TO
RESPONDENTS' ANSWER

PETITIONER'S REPLY IN SUPPORT OF AMENDED PETITION FOR WRIT OF
HABEAS CORPUS

I. INTRODUCTION

The Respondent's opposition does not meaningfully address the constitutional violations that constitute the core of this case. Instead, the Government relies on generalized assertions regarding its authority to detain, ignoring that the courts of this District have repeatedly rejected the use of such authority when detention becomes purely punitive, prolonged, and devoid of administrative logic.

At no point does the Respondent demonstrate that the Petitioner received an individualized determination or sufficient procedural protection to justify his continued detention after having obtained the legal benefit of Withholding of Removal. The Respondent ignores that the Petitioner already has a judicial order prohibiting his removal to his country of origin, which causes his detention to lose its legitimate administrative purpose and turns it into unnecessary punishment.

The Government's position reduces the constitutional inquiry to a mere matter of statutory authority, which is legally incorrect. The Supreme Court and the courts of this District have consistently held that civil detention is especially for someone with a delicate state of health due to a projectile lodged in his chest and with deep family ties, including his United States citizen son, Gerald Alexander Zamora Alvarez remains subject to the limitations of the Fifth Amendment.

The Petitioner maintains that his detention is excessive as there is no individualized justification of risk. It is crucial to highlight that, during his original process, the Petitioner presented sufficient and compelling evidence for Asylum to be granted. However, such relief was limited solely to Withholding of Removal due to a Government administrative bar that prevented its granting at that time. Since said legal impediment has been lifted and, as of March 30, 2026, the authority to grant asylum has been reinstated, the Petitioner now has the full right to rectify his status. Keeping him deprived of his liberty while this legal relief is processed flagrantly violates the Due Process Clause of the Fifth Amendment.

It is imperative to inform this Court that on April 13, 2026, the same day the Government was due to respond to this petition, ICE summarily denied the Petitioner's request for Stay of Deportation, collecting the fee on the same day. This action demonstrates that the Respondent did not conduct a genuine review of the humanitarian evidence presented, but rather acted in a mechanical and superficial manner to attempt to prematurely invalidate the arguments of this Habeas Corpus petition.

The Government's argument regarding an alleged flight risk lacks a factual basis, as ICE has in its possession all of the Petitioner's original documentation, including his Passport, Work Permit, and Social Security card. By controlling his identity documents and following years of perfect compliance with supervision orders, there is no legal basis to allege that the Petitioner will not appear for future appointments.

The Respondent attempts to minimize the humanitarian urgency by alleging the lack of a specific medical certification. However, the standard for urgent humanitarian reasons is not exclusively limited to terminal illnesses. The Petitioner's detention is causing real and provable psychological and developmental harm to his nursing son, Gerald Alexander. Requiring a medical statement to validate the trauma of family separation is a cruel formalism that ignores the best interests of the child and the fact that emotional health is an integral component of human and constitutional rights.

II. GOVERNING LEGAL PRINCIPLES

Noncitizens present in the United States have inalienable rights under the Fifth Amendment that prohibit the deprivation of liberty without due process of law. *Zadvydas v. Davis*, 533 U.S. 678 (2001). When detention no longer serves a preventive or actual removal purpose, it becomes purely punitive and, therefore, unconstitutional.

Although the Government claims to have authority under Section 1231 of the INA, such authority is not absolute nor immune to judicial scrutiny. Administrative detention must be reasonable. In the Petitioner's case, maintaining his detention while he possesses the relief of Withholding of Removal crosses the line of reasonableness and becomes an arbitrary detention.

The Government commits an error of law by asserting that only a medical statement of terminal illness qualifies as a humanitarian reason. Jurisprudence and the public interest recognize that family unity and the well-being of a United States citizen child, Gerald Alexander Zamora Álvarez, constitute humanitarian reasons of superior weight. The Court

has the authority to review whether ICE abused its discretion by ignoring these factors and denying the I-246 application in a mechanical and expedited manner.

Since the Petitioner cannot be removed to his country of origin by judicial mandate, his detention has lost its administrative purpose. It is not necessary for the Petitioner to remain incarcerated to ensure a removal that the Government itself is prohibited from executing at this time. Release under an Order of Supervision is the least restrictive measure and the only one legally justified.

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

The Respondent relies almost exclusively on three insufficient arguments: (1) an absolute interpretation of its statutory authority under Section 1231 of the INA; (2) the existence of a prior removal order; and (3) the alleged lack of a "medical statement" to justify humanitarian reasons. However, none of these points address the true constitutional question facing this Court: whether the prolonged and arbitrary detention of the Petitioner, Jesús Alexander Zamora Molina, remains reasonable, just, and constitutional.

The Respondent evades its responsibility to justify the detention by ignoring the manifest procedural bad faith that occurred on April 13, 2026. On that date, the Government processed and collected the \$155.00 fee for the Application for a Stay of Deportation and, in a purely mechanical act devoid of substantial review, issued a denial that same day. This behavior demonstrates that the Respondent has no interest in an individualized evaluation, but rather in creating an administrative obstacle to avoid the scrutiny of this Court.

The Government fails in its burden to demonstrate that the Petitioner represents a flight risk. A factor that the Respondent deliberately omits is that ICE has in its possession all of the Petitioner's original documentation, including his Passport, Work Permit, and Social Security card. It is legally contradictory to argue that an individual who has complied with every supervision appointment for years and whose identity documents are under federal control must remain incarcerated to ensure his appearance.

The Respondent offers no evidence of a risk assessment that justifies why the Petitioner must remain locked up while awaiting the opportunity to reopen his Asylum case. By ignoring critical factors such as the fact that the Petitioner is the father and sole provider for his eight-month-old United States citizen son, Gerald Alexander Zamora Álvarez, the Government fails to demonstrate that detention is necessary.

Furthermore, the Respondent's position is insufficient because it has failed to provide:

- The Government intends to reduce the humanitarian standard to a medical statement, ignoring that the separation of a father and his nursing son constitutes a humanitarian crisis and a detriment to the public interest.
- There is no evaluation of how the chronic pain caused by the projectile lodged in the Petitioner's chest is aggravated by the conditions of detention.

This omission of individualized evidence and the reliance on generic arguments of authority are fatal to the Respondent's position and demand the immediate intervention of this Court to restore due process.

IV. THE COLLECTION OF THE I-246 FEE AND ITS SUBSEQUENT HASTY DENIAL CONFIRM THE ARBITRARY NATURE OF THE DETENTION

The Petitioner rejects any attempt by the Respondent to justify the legality of his custody based on an administrative process that has proven to be illusory. The fact that the Government processed and collected the \$155.00 fee on April 13, 2026, only to issue a hasty denial coinciding with the deadline to respond to this Court, constitutes an admission that the Petitioner has complied with his obligations, but that the Government has no intention of granting genuine Due Process.

The Respondent uses bureaucratic procedures as a dilatory tactic to avoid judicial review. The collection of an administrative fee is not a substitute for Due Process, nor does it justify the deprivation of physical liberty. By retaining the Petitioner's funds and issuing a mechanical decision without considering the humanitarian evidence, the Government demonstrates that the detention has lost its legitimate purpose of removal and has become a purely punitive and arbitrary measure.

While the Government hides behind formalisms, the Petitioner's health deteriorates due to the projectile lodged in his chest and his citizen son, G [REDACTED] continues to be deprived of his only provider. The Government's interest in administrative efficiency can never stand above the constitutional mandate to protect the physical integrity of individuals and the well-being of minor citizens.

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

The Petitioner has been in physical custody since January 14, 2026. Although the Government attempts to justify this deprivation of liberty under the guise of an administrative process, the reality is that there is no certain date for its conclusion. The detention has become indeterminate because the Petitioner has already obtained the protection of Withholding of Removal, which means that the Government is prohibited by law from executing a deportation to his country of origin. Since he cannot be removed, his detention lacks purpose.

Holding the Petitioner in detention while he seeks to exercise his right to reopen his case to apply for Asylum a process that can last months or years converts the detention into an unreasonable and punitive measure. Immigration proceedings are inherently slow, and using that slowness as an excuse to keep a father behind bars is a direct violation of the doctrine of *Zadvydas v. Davis*.

The Government's reliance on the existence of ongoing proceedings ignores the central issue: detention cannot continue indefinitely, especially when the Petitioner suffers from debilitating chronic pain due to a projectile lodged in his chest. The physical suffering that

detention entails for someone with this medical condition, added to the irreparable harm to his eight-month-old United States citizen son, G [REDACTED] outweighs any legitimate governmental interest.

The argument that detention is necessary to ensure the Petitioner does not flee is unfounded. As previously mentioned, ICE possesses the Petitioner's Passport, Work Permit, and Social Security card. There is no possibility of flight when the Government controls the individual's identity documents. Therefore, detention is not a security tool, but an abuse of power.

The Petitioner's detention has crossed the line of reasonableness. Since there is no significant likelihood of removal in the reasonably foreseeable future due to the judicial prohibition on sending him to his country and because the Government is withholding his travel documents, the legal basis for his custody has vanished. Keeping him locked up under these circumstances is an arbitrary detention that this Court must correct.

VI. PROLONGED DETENTION WITHOUT JUDICIAL REVIEW IS CONSTITUTIONALLY DEFICIENT

The Petitioner, Jesús Alexander Zamora Molina, has remained in physical custody since January 14, 2026. Although his proceedings concluded with an order of Withholding of Removal, his liberty remains restricted indefinitely and without a clear administrative purpose. Due Process requires that, when detention becomes prolonged, the Government must justify before a neutral tribunal why the deprivation of liberty remains necessary and reasonable.

The Government has not met the burden of proof to demonstrate that the Petitioner represents a danger or a flight risk. On the contrary, the Petitioner now has a maximum legal incentive to comply with all laws and appear for his appointments: the real opportunity to elevate his current protection to permanent Asylum. It is imperative to highlight that the initial process included sufficient evidence for Asylum, which was limited to Withholding only due to an administrative bar that is no longer in effect. With this legal path available, the Petitioner is the party most interested in securing his legal status definitively.

An individualized judicial review which the Petitioner has not received would demonstrate that:

- He is the sole provider for his eight-month-old United States citizen son, G [REDACTED] [REDACTED] and maintains a stable home in the Tacoma area with his partner.
- The Petitioner cannot be removed to his country by judicial order; therefore, detention without an end date becomes a punitive and indefinite punishment that violates the Zadvydas doctrine.

- He suffers from intense chronic pain from a projectile lodged in his chest, a condition that requires care and monitoring that the detention environment cannot adequately provide.
- The Petitioner demonstrated his willingness to comply by paying the \$155.00 fee for his release under supervision on April 13, 2026.

Maintaining custody based solely on generic administrative authority, while ignoring these factors and the Petitioner's need to be at liberty to prepare his Motion to Reopen for Asylum, results in an arbitrary detention that violates the Due Process Clause of the Fifth Amendment to the Constitution.

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

The Respondent does not present a single piece of individualized evidence demonstrating that the Petitioner represents a danger to the community or a flight risk. On the contrary, the record shows an individual who has sought legal protection in a transparent manner, who has complied with every prior supervision order, and who has an established and stable home in the state of Washington.

Instead of evidence, the Respondent relies on generalized assertions regarding its statutory authority. Such speculations are constitutionally insufficient when the physical liberty of a father is at stake. The Government deliberately ignores critical individual factors that favor immediate release:

- The Petitioner has no record that qualifies him as a threat to public safety.
- His absolute priority is the well-being, health, and future of his eight-month-old son, G [REDACTED] a United States citizen.
- The flight risk argument is completely invalidated by the fact that ICE maintains possession of the Petitioner's original Passport, Work Permit, and Social Security card. No person with an open legal process and whose identity documents are held by the Government represents a risk of disappearance.
- His state of health, marked by chronic pain from the projectile lodged in his chest, makes him an ideal candidate for external supervision (I-220B) instead of physical detention, which exacerbates his condition.

Continued detention cannot be justified by the mere administrative convenience of ICE. The detention of an individual who already possesses judicial protection against deportation requires an extraordinary justification that the Government has not provided. The law requires a reasonable connection between detention and removal; however, as the Petitioner's removal to his country is prohibited, said connection has been broken.

The courts of this District have systematically required a specific justification for prolonged detention. The Respondent provides no explanation as to why the Petitioner cannot await

his Asylum process under a supervision program, which guarantees his appearance effectively without sacrificing his physical integrity or family unity. In conclusion, the Respondent has not met, and cannot meet, the constitutionally required burden of proof to demonstrate that the Petitioner must remain deprived of his liberty. The lack of individualized evidence converts his custody into an arbitrary detention.

VIII. PETITIONER REPRESENTS NO DANGER OR FLIGHT RISK

The evidentiary record affirmatively demonstrates that the continued detention of Petitioner, Jesús Alexander Zamora Molina, is unnecessary and disproportionate. Individual facts outweigh any general presumption of custody that the Government intends to apply.

Petitioner has established through clear evidence that:

- He is the father of [REDACTED] an eight-month-old United States citizen. His presence is vital not only for financial support but for the minor's emotional and physical development.
- He has an established home in the Tacoma, Washington area, together with his partner, Emely Scarleth Álvarez García, who provides the necessary support system to guarantee compliance with all legal obligations.
- Far from seeking to evade justice, Petitioner has a maximum interest in appearing for every appointment, as he seeks to elevate his current status from Withholding of Removal to permanent Asylum. Fleeing would mean losing the only legal opportunity he has to protect his life and remain with his family.

Respondent has not refuted this evidence with specific facts. There is no evidence that Petitioner has a history of misconduct or represents a threat to the community. On the contrary, his record is that of a worker and a responsible father.

The deterioration of his health, marked by chronic pain due to the projectile lodged in his chest, makes the idea of flight physically implausible. Petitioner depends on the stability of his home and the proximity to his support network to manage his medical condition.

The detention arises from a civil immigration context, not criminal conduct. Maintaining him in physical custody, when the Government already has his documents and alternatives such as periodic reporting under an order of supervision exist, is an excessive measure that does not serve public safety and only causes unnecessary harm to a United States citizen child.

IX. THE JURISPRUDENCE OF THIS DISTRICT CONFIRMS THAT THE DETENTION IS UNCONSTITUTIONAL

Courts within this District have recently addressed materially indistinguishable circumstances and have granted Habeas Corpus relief, establishing a precedent that must be applied to the case of Petitioner, Jesús Alexander Zamora Molina.

In *Caisa Telenchana v. Hermosillo*, Case No. 2:26-cv-00363-GJL (W.D. Wash. Mar 12, 2026), this Court held that detention without an individualized evaluation or a real opportunity to be heard violates Due Process. In that case, the Court granted the writ of Habeas Corpus because the Government failed to justify the necessity of the deprivation of liberty in the face of family ties and the detainee's lack of dangerousness.

Fundamental Legal Similarities:

- Petitioner has developed fundamental liberty interests, especially following the birth of his United States citizen son, G [REDACTED]
- He is being held in detention without an individualized evaluation considering his delicate health status and his legal status of Withholding of Removal, which prohibits his immediate deportation.

The reasoning in *Caisa Telenchana* is clear: the lack of individualized evaluations and the use of detention as an end in itself is constitutionally deficient. This conclusion applies with full force to Petitioner's case. To ignore this precedent would result in unequal and arbitrary treatment toward Mr. Zamora Molina, who is in a legally analogous situation to that of petitioners who have already been released by this District.

This Court must adhere to recent Washington jurisprudence to ensure judicial consistency and protect Due Process. Petitioner's detention, lacking a specific justification as to why he cannot be supervised at liberty alongside his family in Tacoma, flagrantly violates the Fifth Amendment.

X. ANALYSIS UNDER MATHEWS V. ELDRIDGE COMPELS THE GRANTING OF RELIEF

The analysis of the factors established in *Mathews v. Eldridge*, 424 U.S. 319 (1976), demonstrates that the Petitioner's continued detention is constitutionally unsustainable:

A. Private Interest:

The Petitioner's interest in his physical liberty is fundamental. This interest is intensified by two critical human and legal factors:

1. His role as the father and sole provider for his eight-month-old United States citizen son, G [REDACTED] whose stability and development depend on the Petitioner's physical presence.
2. His right to physical integrity is gravely compromised by the chronic pain resulting from a projectile lodged in his chest. The civil detention environment is not suitable for the management of a medical condition of this nature, which requires a specialized recovery and monitoring environment that can only be obtained at liberty.

B. Risk of Error:

The risk of an erroneous deprivation of liberty is extraordinarily high. The Petitioner remains detained without the Government having individually evaluated the impact of his already granted Withholding of Removal. Keeping someone detained by default, ignoring that they have a judicial order prohibiting their removal to their country of origin and that they now have the right to reopen their case to apply for Asylum, is a serious procedural error that violates due process.

C. Government Interest:

The Government's interest in maintaining the Petitioner in physical custody is minimal or non-existent for the following reasons:

1. The Government already achieves its objective of ensuring the Petitioner's appearance, as ICE possesses his original Passport, Work Permit, and Social Security card. Without these documents, the flight risk is null.
2. The Petitioner has the maximum incentives to comply with the law and appear for his appointments, as he is the primary party interested in elevating his status to permanent Asylum to protect his life and that of his family in Washington.
3. The Government can ensure supervision through an Order of Supervision, which is less costly and guarantees the same result without violating constitutional rights.

The three Mathews factors weigh decisively in favor of the Petitioner. The constitutional harm of keeping a father with health problems under indefinite detention outweighs any minimal administrative burden that his release under supervision would entail.

XI. CONTINUED DETENTION IS ARBITRARY AND UNCONSTITUTIONAL

Taken together, the factors present in this case demonstrate that the Petitioner's custody has crossed the line from administrative to purely arbitrary:

1. The Petitioner has exceeded a reasonable period of detention, especially considering that he possesses a Withholding of Removal benefit that prohibits his deportation to his country of origin. There is no certain date for his release nor a justification for keeping him locked up while his right to apply for permanent Asylum is processed.
2. The Government has systematically ignored the Petitioner's particular circumstances, treating him as a case number and not as a father with a serious medical condition that requires a recovery environment outside of a detention center.
3. The record is void of evidence suggesting that the Petitioner is a threat or a flight risk. On the contrary, the fact that ICE maintains possession of his original Passport, Work Permit, and Social Security card guarantees his full locatability. His desire to care for his eight-month-old United States citizen son, G [REDACTED] and to regularize his legal status in Washington, ensures his total cooperation with the authorities.

4. The fact of having processed the collection of the I-246 fee on April 13 to issue a mechanical denial demonstrates that the Government is not acting within the spirit of the law, but in an arbitrary manner to maintain a detention that no longer has a legal basis.

For all of the above, the Petitioner's continued detention is arbitrary. The Respondent has not met the minimum constitutional requirements to justify this deprivation of physical liberty under the Fifth Amendment. Keeping the Petitioner in these conditions constitutes an abuse of power that this Court must correct by ordering his immediate release under supervision.

XII. REQUEST FOR RELIEF

For the reasons of fact and law set forth in this Reply, the Petitioner, Jesús Alexander Zamora Molina, respectfully requests that this Court:

A. ASSUME AUTHORITY TO DECIDE ON RELEASE: That, in light of the Respondent's systematic refusal to offer fair administrative solutions or to conduct a genuine review of the case, this Court exercise its judicial authority to determine the Petitioner's liberty, preventing his due process from depending on an agency acting in an arbitrary manner.

B. ORDER IMMEDIATE RELEASE: That the Petitioner's release be ordered under such conditions of supervision as this Court deems reasonable (I-220B), given that his detention has ceased to serve a legitimate administrative purpose, is excessively prolonged, and violates the Due Process Clause of the Fifth Amendment.

C. ORDER THE IMMEDIATE RETURN OF DOCUMENTATION: That the Department of Homeland Security be ordered to return the Petitioner's Work Permit and Social Security card. The withholding of these documents, added to the physical detention, constitutes a disproportionate restriction, especially when control of such documentation is sufficient to guarantee the Petitioner's appearance without the need for incarceration.

D. DECLARE THE ARBITRARY NATURE OF THE I-246 DENIAL: That the Court recognize that ICE's administrative process was an arbitrary and capricious act by processing the fee collection and issuing a mechanical denial on the same day, April 13, 2026, without conducting a substantial review of the humanitarian evidence or the Petitioner's medical condition.

E. GRANT any other relief that this Court deems just and proper to ensure the protection of the Petitioner's constitutional rights, his physical integrity in the face of the chronic pain he suffers, and the best interests of his United States citizen son, Gerald Alexander Zamora Álvarez.

XIII. CONCLUSION

The constitutional violations in this case are clear, substantial, and irrefutable. The Petitioner remains deprived of his liberty despite having judicial protection against

deportation and facing constant physical deterioration due to the projectile lodged in his chest. Maintaining this detention when removal is legally unfeasible strips custody of its administrative purpose and converts it into unconstitutional punishment.

The Respondent has failed to provide adequate process or justify the detention through individualized evidence. The Government's arbitrariness was demonstrated on April 13, 2026, when ICE processed the fee collection and issued a mechanical denial of the I-246 application on the same day, without conducting a real review of the humanitarian evidence presented. This mechanical act confirms that the Government is not acting within the spirit of the law, but rather evading its procedural responsibilities.

Under the binding principles of the Fifth Amendment and the persuasive authority of recent rulings in this District, such as *Caisa Telenchana v. Hermosillo*, this detention cannot be sustained. Justice demands the protection of the Petitioner's physical integrity and the best interests of his eight-month-old United States citizen son, G [REDACTED]

Consequently, Habeas Corpus relief is strictly necessary to restore the rule of law and Due Process. The Petitioner must be released immediately, and his identity documents must be returned to him so that he may continue his legal process at liberty.

XIV. WAIVER OF ADDITIONAL REPLIES AND REQUEST FOR EXPEDITED DECISION

The Petitioner formally states that he has presented all his arguments of fact and law, and that he has no additional filings to present beyond what is contained in his original Petition and this Reply.

The Petitioner hereby voluntarily waives any remaining time to file additional responses. The Petitioner considers the record sufficient for this Court to issue a fair and well-founded ruling.

Due to the humanitarian urgency surrounding this case specifically the constant deterioration of the Petitioner's health due to the projectile lodged in his chest and the irreparable harm suffered by his nursing son, G [REDACTED] the Petitioner respectfully requests that the Court not wait until the closing date of May 4, 2026, to resolve this petition.

The Petitioner urges the Court to exercise its authority to issue an order expeditiously, based on the evidence of administrative bad faith demonstrated by the Respondent this past April 13 and the unnecessary deprivation of liberty of an individual whose identity documents are already under Government control.



JESUS ALEXANDER ZAMORA MOLINA

A# 

Petitioner, Pro Se

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APR 17 2026	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

JESUS ALEXANDER ZAMORA MOLINA)

A# [REDACTED])

Petitioner,)

Vs.)

WARDEN / FACILITY ADMINISTRATOR)
Northwest Processing Center)

Respondent)

Case No. 2:26-cv-01078-KKE

PETITIONER'S REPLY
(TRAVERSE) TO
RESPONDENTS' ANSWER

DECLARATION OF JESÚS ALEXANDER ZAMORA MOLINA

I, JESÚS ALEXANDER ZAMORA MOLINA, declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

I. IDENTITY AND CURRENT CUSTODY

I am the Petitioner in this habeas corpus action. My name is JESÚS ALEXANDER ZAMORA MOLINA, and my Alien Registration Number is A# [REDACTED]. I am currently detained at the Northwest Processing Center in Tacoma, Washington. I have been in physical custody since January 14, 2026. I remain detained despite having a final order of Withholding of Removal, which legally prohibits my removal to my country of origin.

II. ADMINISTRATIVE DILIGENCE AND PROCEDURAL BAD FAITH

As evidence of my commitment to the law and my intention to comply with any supervision measures, I submitted my I-246 application. On April 13, 2026, the Government processed and collected the \$155.00 fee.

Under penalty of perjury, I declare that on that same day, April 13, 2026, ICE issued a mechanical denial of my application without conducting a real review of my health status or my family ties. This action demonstrates that the collection was an empty formality and that there is no administrative will to evaluate my case on an individualized basis.

III. ABSENCE OF FLIGHT RISK AND DOCUMENTARY CONTROL

I declare that I do not represent a flight risk. A determining factor is that Immigration and Customs Enforcement has in its possession my original Passport, my Work Permit, and my Social Security card.

Not having my identity documents in my possession and having a pending legal process for Asylum, my sole interest is to remain in the Tacoma area and strictly comply with all supervision appointments and court orders, as I have done in the past.

IV. MEDICAL AND FAMILY SITUATION

I suffer from intense chronic pain due to a projectile that remains lodged in my chest. The detention environment and stress aggravate my physical condition, preventing me from receiving the specialized treatment that my health requires.

I am the father and primary provider for my eight-month-old son, G [REDACTED] a United States citizen. My family resides in Tacoma, and I have the full support of my partner, Emely Scarleth Álvarez García, to ensure my stability and compliance with the law upon my release.

V. LEGAL PLANS

It is my intention to file a Motion to Reopen my Asylum case, as the government bar that initially limited my protection has been lifted. My current detention severely hinders my ability to coordinate this essential legal defense.

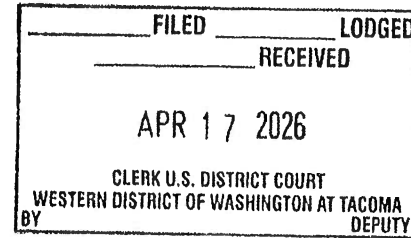
I make this declaration based on my personal knowledge to support my request for immediate release under supervision and the return of my identity documents.



JESUS ALEXANDER ZAMORA MOLINA

A [REDACTED]
Petitioner, Pro Se

April 17, 2026
CLERK OF THE COURT
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
1717 PACIFIC AVENUE, SUITE 3100
TACOMA, WA 98402-3200



RE: PETITIONER'S REPLY (TRAVERSE) TO RESPONDENTS' ANSWER
CASE NO: 2:26-cv-01078-KKE
PETITIONER: JESÚS ALEXANDER ZAMORA MOLINA A# 

Dear Clerk of the Court:

Please file the attached Petitioner's Reply (Traverse) to Respondents' Answer pursuant to the Court's scheduling order, submitted by Petitioner JESÚS ALEXANDER ZAMORA MOLINA, A 

Through this filing, Petitioner responds to the Government's arguments, challenges the legality of his continued detention, and highlights the arbitrary nature of the administrative process, including the Government's current possession of his original identity documents. Petitioner further requests that the Court take the matter under advisement for immediate decision due to urgent medical and family circumstances.

Attached to this request are:

1. Personal Letter addressed to the Honorable Judge Kymberly K. Evanson.
2. Petitioner's Reply (Traverse) to Respondents' Answer.
3. Petitioner's Sworn Declaration

Thank you for your attention to this matter.

Sincerely,



JESÚS ALEXANDER ZAMORA MOLINA
Peticionario, Pro Se
A# 
Northwest Processing Center
1623 E. J Street, 
Tacoma, WA 98421

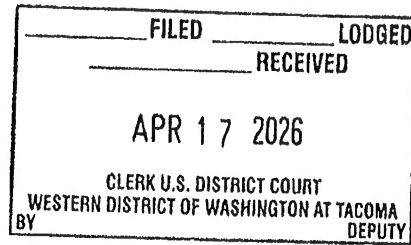
PERSONAL LETTER TO THE COURT

Date: April 17, 2026

To: Honorable Judge Kymberly K. Evanson

From: Jesús Alexander Zamora Molina

Case No.: 2:26-cv-01078-KKE



Dear Honorable Judge Evanson,

I am writing this letter with the utmost respect and with my hopes placed in your sense of justice and humanity. I find myself in a moment of great despair, not only for my physical liberty, but for the well-being of my family.

My detention has become an unbearable burden for two fundamental reasons that cause me anguish every day:

First, my physical health. I live with constant pain due to the projectile that remains lodged in my chest. Being in custody prevents me from seeking the specialized medical care I need, and the stress of this situation only worsens my condition.

Second, my eight-month-old son, C [REDACTED] He is a United States citizen and he needs me. Knowing that my partner, Emely, is struggling alone to raise him while I remain trapped despite the fact that a judge has already ruled that I cannot be sent back to my country causes me profound pain.

I want you to know, Your Honor, that I do not represent any flight risk. ICE has my original documents in its custody: my Passport, my Work Permit, and my Social Security card. My only desire is to be in Tacoma with my family, to work, and to fight my Asylum case now that the law allows me to seek permanent protection.

This past April 13, with great effort, we paid the \$155 fee that ICE requested to review my release. However, they processed the payment and denied my request on the very same day, without conducting a real evaluation of my health or my son's situation. For this reason, I turn to you as the final instance of justice.

I humbly ask that you consider my situation and allow me to return to my home under supervision. I only want to be the father my son deserves and to comply with the laws of this country, which is my home.

Thank you for your time and for considering my words.
Sincerely,

A handwritten signature in dark ink, appearing to be "JAM" or similar, written in a cursive style.

JESÚS ALEXANDER ZAMORA MOLINA

Peticionario, Pro Se

A# [REDACTED]