

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Ezquiel Flores-MARTINEZ  
A- [REDACTED]  
1623 E. J. Street, suite 5  
TACOMA, WA. 98421

Full name, address and prison number (if any)

Petitioner

vs. Pamela Bondi, U.S. Atty Gen.  
Bruce Scott, Warden

Name of Respondent (person having custody  
of petitioner)

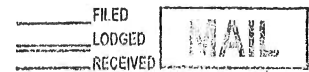
Kristin NDEM. Respondent  
Secretary - DHS

Civil Case No.: 2:26-cv-01095-TL

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

PETITION FOR  
WRIT OF HABEAS CORPUS

UNDER 28 USC 2241



MAR 30 2026

**INSTRUCTIONS – READ CAREFULLY**

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

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 pace 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.

- NORTHWEST ICE DETENTION CENTER
1. Place of detention 1623 E. J. STREET, TACOMA, WA. 98421
  2. Name and location of court and name of judge who imposed sentence:  
TAMMY FITTING: IMMIGRATION COURT: 1623 E. J. STREET STE. 3  
TACOMA, WA. 98421
  3. The indictment number or numbers (if known) upon which, and the offenses for which, sentence was imposed:
    - a. A- [REDACTED] IMMIGRATION COURT.
    - b. N/A
    - c. N/A
  4. The date upon which sentence was imposed and the terms of the sentence: MARCH 17, 2026
    - a. IMMIGRATION DETENTION DECISION
    - 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. I've been detained at ICE for over 7 months now, since August 24, 2025, without a signed warrant by a Federal Judge, in violation of my Due Process Protections of the U.S. Constitution

b. As stated above, also in violation of my Liberty Interest.

- c. As Related Above, UNLAWFUL ARREST, DETENTION HAVE CREATED A CASE OF: INDEFINITE DETENTION.

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

- a. DUE PROCESS - violation of my 1<sup>st</sup> 5<sup>th</sup> 8<sup>th</sup> 13<sup>th</sup> 14<sup>th</sup> Amendment Protections under the U.S. Constitution. And my Civil Rights.
- b. Liberty Interest - violation of my 1<sup>st</sup> 5<sup>th</sup> 8<sup>th</sup> 13<sup>th</sup> And 14<sup>th</sup> Amendment Civil Rights Protections of the U.S. Constitution.
- c. INDEFINITE DETENTION - violation of my 1<sup>st</sup> 5<sup>th</sup> 8<sup>th</sup> 13<sup>th</sup> And 14<sup>th</sup> Amendment Protections of the U.S. Constitution. And my Civil Rights

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?

N/A

N/A

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

N/A

ii.

N/A

N/A

iii.

N/A

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: Attached Affidavit

By:



Signature of Petitioner

State of Washington)

) as

County of Pierce)

I, Ezequiel Flores Martinez, 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: \_\_\_\_\_

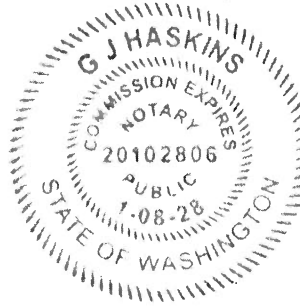


Signature of Affiant

SUBSCRIBED and SWORN to  
before me this 25 day of  
MARCH, 2026.  
(month) (year)

STATE of WASHINGTON  
County of PIERCE

G J HASKINS



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