

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Ruben MENDEZ DOMINGUEZ, Juan
DELEON SIQUINA, Ramiro
FERNANDEZ PAZ, Alfredo
GONZALEZ HERNANDEZ, Alejandro
SANCHEZ MURILLO, Norberto
TORRES OROZCO, Francisco BERNAL
BERNAL, Margarito SANTAELLA
VEGA, and Benito HERNANDEZ
MARTINEZ,

Petitioners,

v.

Laura HERMOSILLO, Seattle Field
Office Acting Director, Enforcement and
Removal Operations, U.S. Immigration
and Customs Enforcement (ICE); U.S.
DEPARTMENT OF HOMELAND
SECURITY; EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; Bruce
SCOTT, Warden, Northwest ICE
Processing Center,

Respondents.

Case No. 2:25-cv-2337

**PETITION FOR WRIT OF
HABEAS CORPUS**

**INDIVIDUAL
ENFORCEMENT OF
RODRIGUEZ VAZQUEZ BOND
DENIAL CLASS JUDGMENT**

FACTS

1. Petitioners Ruben Mendez Dominguez, Juan DeLeon Siquina, Ramiro Fernandez Paz, Alfredo Gonzalez Hernandez, Alejandro Sanchez Murillo, Norberto Torres Orozco, Francisco Bernal Bernal, Margarito Santaella Vega, and Benito Hernandez Martinez bring this petition for a writ of habeas corpus to seek enforcement of their rights as members of the Bond Denial Class certified in *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. filed Mar. 20, 2025).¹

2. On September 30, 2025, this Court issued a final judgment “declar[ing] that Bond Denial Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under 8 U.S.C. § 1225(b)(2).” *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ----, 2025 WL 2782499, at *27 (W.D. Wash. Sept. 30, 2025).

3. The Court further declared “that the Tacoma Immigration Court’s practice of denying bond to Bond Denial Class members on the basis of § 1225(b)(2) violates the Immigration and Nationality Act.” *Id.*

Petitioner Ruben Mendez Dominguez

1. Petitioner Ruben Mendez Dominguez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at Northwest ICE Processing Center (NWIPC) after being apprehended by U.S. Immigration and Customs Enforcement (ICE) on May 20, 2025, *see* Ex. A;²
- (b) entered the United States without inspection over twenty years ago and was not apprehended upon arrival, *see* Mendez Decl. ¶¶ 2–3; *see also* Ex. B; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

¹ The Bond Denial Class is comprised of “[a]ll noncitizens without lawful status detained at the Northwest ICE Processing Center [NWIPC] who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival, (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing.” *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, --- F. Supp. 3d ----, 2025 WL 2782499, at *6 (W.D. Wash. Sept. 30, 2025).

² All exhibit citations are to the authenticating declaration of Sydney Maltese filed contemporaneously with this petition.

2. After apprehending Mr. Hernandez on May 20, the Department of Homeland Security (DHS) placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Petitioner as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. B.

3. On June 11, 2025, an Immigration Judge (IJ) denied Mr. Mendez's bond request based on lack of jurisdiction, finding that he is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). The IJ ruled that, in the alternative, if mandatory detention did not apply, the IJ would have set bond at \$2,500. Ex. C.

Petitioner Juan DeLeon Siquina

4. Petitioner Juan DeLeon Siquina is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on October 25, 2025, *see* Ex. D;
- (b) entered the United States without inspection over ten years ago and was not apprehended upon arrival, *see* Ex. E; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

5. After apprehending Mr. DeLeon on October 25, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Petitioner as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. E.

6. Mr. DeLeon is scheduled for a bond hearing before an IJ on November 24, 2025. *See* Ex. F.

Petitioner Ramiro Fernandez Paz

7. Petitioner Ramiro Fernandez Paz is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by U.S. Border Patrol on April 13, 2025, *see* Ex. G;
- (b) entered the United States without inspection more than 4 years ago and was not apprehended upon arrival, *see* Ex. H; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

8. After apprehending Mr. Fernandez on April 13, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Fernandez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. H.

Petitioner Alfredo Gonzalez Hernandez

9. Petitioner Alfredo Gonzalez Hernandez is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on November 4, 2025, *see* Gonzalez Decl. ¶ 4;
- (b) entered the United States without inspection over twenty years ago and was not apprehended upon arrival, *see id.* ¶¶ 2–3; *see also* Ex. I; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

10. After apprehending Mr. Gonzalez on November 4, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Gonzalez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. I.

Petitioner Alejandro Sanchez Murillo

11. Petitioner Alejandro Sanchez Murillo is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on October 28, 2025, Ex. J;
- (b) entered the United States without inspection over twenty years ago and was not apprehended upon arrival, *see* Ex. K; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

12. After apprehending Mr. Sanchez on October 28, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Sanchez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. K.

Petitioner Norberto Torres Orozco

13. Petitioner Norberto Torres Orozco is a member of the Bond Denial Class, as he:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on or around November 7, 2025, Torres Decl. ¶ 3;
- (b) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *see id.* ¶¶ 2–3; Ex. L, and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

14. After apprehending Mr. Torres on November 7, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Torres as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. L.

Petitioner Francisco Bernal Bernal

15. Petitioner Francisco Bernal Bernal is a member of the Bond Denial Class, as he:

- (d) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on or around November 8, 2025, Bernal Decl. ¶¶ 3–4;
- (e) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *see id.* ¶¶ 2–3; and
- (f) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

16. After apprehending Mr. Bernal on November 8, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Bernal as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

Petitioner Margarito Santaella Vega

17. Petitioner Margarito Santaella Vega is a member of the Bond Denial Class, as he:

- (g) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on or around November 15, 2025, Santaella Decl. ¶¶ 3–4;
- (h) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *see id.* ¶¶ 2–3; and

(i) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

18. After apprehending Mr. Santaella on November 15, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Santaella as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

Petitioner Benito Hernandez Martinez

19. Petitioner Benito Hernandez Martinez is a member of the Bond Denial Class, as he:

(j) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on or around November 7, 2025, Hernandez Decl. ¶¶ 3–4;

(k) entered the United States without inspection and was not apprehended upon arrival, *see id.* ¶¶ 2–3; and

(l) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

20. After apprehending Mr. Hernandez on November 7, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Hernandez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection.

21. The Court should expeditiously grant this petition.

22. For all Petitioners, Respondents are bound by the judgment in *Rodriguez Vazquez*, as it has the full “force and effect of a final judgment.” 28 U.S.C. § 2201(a). Nevertheless, Respondents continue to flagrantly defy the judgment in that case and continue to subject Petitioners to unlawful detention despite their clear entitlement to consideration for release on bond as Bond Denial Class members.

23. The Court should accordingly order that within one day, Respondent DHS must release Mr. Mendez, who has received an alternative bond order by an IJ, or allow for his release upon payment of the alternative bond amount set by the IJ.

24. For the remaining Petitioners, the Court should order their release unless Respondents provide a bond hearing under 8 U.S.C. § 1226(a) within seven days.

JURISDICTION & VENUE

25. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause). The Court may grant relief pursuant to 28 U.S.C. § 2241; the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*; and the All Writs Act, 28 U.S.C. § 1651.

26. Venue is proper in this District because Petitioners are detained at the NWIPC in Tacoma, Washington. Venue is also proper under 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and a substantial part of the events or omissions giving rise to the claims occurred in this District.

PARTIES

27. Petitioner Ruben Mendez Dominguez was apprehended by immigration officers on May 20, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

28. Petitioner Juan DeLeon Siquina was apprehended by immigration officers on October 25, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

29. Petitioner Ramiro Fernandez Paz was apprehended by immigration officers on April 13, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

30. Petitioner Alfredo Gonzalez Hernandez was apprehended by immigration officers on or around November 4, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

31. Petitioner Alejandro Sanchez Murillo was apprehended by immigration officers on October 28, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

32. Petitioner Norberto Torres Orozco was apprehended by immigration officers on or around November 7, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

33. Petitioner Francisco Bernal Bernal was apprehended by immigration officers on or around November 8, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

34. Petitioner Margarito Santaella Vega was apprehended by immigration officers on or around November 15, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

35. Petitioner Benito Hernandez Martinez was apprehended by immigration officers on or around November 7, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

36. Respondent Laura Hermosillo is the Seattle Field Office Acting Director of ICE's Enforcement and Removal Operation division. As Petitioners' immediate custodian, she is responsible for Petitioners' detention and removal. She is named in her official capacity.

37. Respondent U.S. Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the Immigration and Nationality Act (INA), including the detention and removal of noncitizens.

38. Respondent Executive Office for Immigration Review (EOIR) is the federal agency responsible for implementing and enforcing the INA in removal proceedings, including for custody redeterminations in bond hearings.

39. Respondent Bruce Scott is employed by The Geo Group, Inc., as Warden of the NWIPC, where Petitioners are detained. He has immediate physical custody of Petitioners. He is sued in his official capacity.

CLAIMS FOR RELIEF

**Violation of the INA:
Request for Relief Pursuant to *Rodriguez Vazquez***

40. Petitioners repeat, re-allege, and incorporate by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

41. As members of the Bond Denial Class, Petitioners are entitled to consideration for release on bond under 8 U.S.C. § 1226(a).

42. The judgment in *Rodriguez Vazquez* makes clear that Respondents violate the INA in applying the mandatory detention statute at § 1225(b)(2) to class members.

43. Respondents are parties to *Rodriguez Vazquez* and bound by the Court's declaratory judgment, which has the full "force and effect of a final judgment." 28 U.S.C. § 2201(a).

44. By denying Petitioners a bond hearing under § 1226(a) and asserting that they are subject to mandatory detention under § 1225(b)(2), Respondents violate Petitioners' rights under the INA and this Court's judgment in *Rodriguez Vazquez*.

PRAYER FOR RELIEF

WHEREFORE, Petitioners pray that this Court grant the following relief:

- a. Assume jurisdiction over this matter;
- b. Issue a writ of habeas corpus requiring that within one day, Respondents release Petitioner Mendez unless they allow for his release upon payment of the alternative bond amount and any other conditions set by the IJ;
- c. Issue a writ of habeas corpus as to Petitioners DeLeon, Fernandez, Gonzalez, Sanchez, Torres, Bernal, Santaella, and Hernandez requiring Respondents to provide a bond hearing under 8 U.S.C. § 1226(a) within seven days;
- d. Award Petitioners attorney's fees and costs under the Equal Access to Justice Act (EAJA), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

e. Grant any other and further relief that this Court deems just and proper.

DATED this 20th of November, 2025.

s/ Matt Adams

Matt Adams, WSBA No. 28287
matt@nwirp.org

s/ Leila Kang

Leila Kang, WSBA No. 48048
leila@nwirp.org

s/ Glenda M. Aldana Madrid

Glenda M. Aldana Madrid, WSBA No. 46987
glenda@nwirp.org

s/ Aaron Korthuis

Aaron Korthuis, WSBA No. 53974
aaron@nwirp.org

s/ Amanda Ng

Amanda Ng, WSBA No. 57181
amanda@nwirp.org

NORTHWEST IMMIGRANT
RIGHTS PROJECT
615 Second Ave., Suite 400
Seattle, WA 98104
(206) 957-8611

Counsel for Petitioners