

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Juan MEDINA OCAMPO, Rafael ALBA
CEJA, Joel COLINDRES ZAMORA,
Adelaida MARTINEZ VAZQUEZ, Edwin
ROJAS MONTES, Cristobal SANCHEZ
SIQUINA, Jenifher DE LOS ANGELES
RODRIGUEZ, Macario BAUTISTA
SANCHEZ, Santiago DOMINGUEZ
JIMENEZ, and Jose Luis CARRILLO
HERNANDEZ,

Petitioners,

v.

Laura HERMOSILLO, Seattle Acting
Field Office 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-2408

**PETITION FOR WRIT OF
HABEAS CORPUS**

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

FACTS

1. Petitioners Juan Medina Ocampo, Rafael Alba Ceja, Joel Colindres Zamora, Adelaida Martinez Vazquez, Edwin Rojas Montes, Cristobal Sanchez Siquina, Jenifher De Los Angeles Rodriguez, Macario Bautista Sanchez, Santiago Dominguez Jimenez, and Jose Luis Carrillo Hernandez 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 Juan Medina Ocampo

1. Petitioner Juan Medina Ocampo 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 October 26, 2025, *see* Ex. A;²
- (b) entered the United States without inspection over fifteen years ago and was not apprehended upon arrival, *cf. id.*; 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. Medina on October 26, 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 November 24, an Immigration Judge (IJ) denied Mr. Medina'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 \$12,000. Ex. C.

Petitioner Rafael Alba Ceja

4. Petitioner Rafael Alba Ceja 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 DHS on or around November 18, 2025, Alba Decl. ¶¶ 4–5;
- (b) last entered the United States without inspection more than one year ago and was not apprehended upon arrival, *id.* ¶ 3; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

5. After apprehending Mr. Alba on or around November 18, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Alba as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. D.

Petitioner Joel Colindres Zamora

6. Petitioner Joel Colindres Zamora 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 DHS on or around November 6, 2025, Colindres Decl. ¶¶ 3–4;
- (b) entered the United States without inspection more than three years ago and was not apprehended upon arrival, *id.* ¶ 2; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

7. After apprehending Mr. Colindres on or around November 6, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Colindres 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.

Petitioner Adelaida Martinez Vazquez

8. Petitioner Adelaida Martinez Vazquez is a member of the Bond Denial Class, as she:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by ICE on September 30, 2025, *see* Ex. F;
- (b) entered the United States without inspection over four years ago and was not apprehended upon arrival, *cf. id.* at 5–6;
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

9. After apprehending Ms. Martinez on September 30, DHS placed her in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. Martinez as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See* Ex. G.

Petitioner Edwin Rojas Montes

10. Petitioner Edwin Rojas Montes 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 DHS on or around November 10, 2025, Rojas Decl. ¶¶ 3–4;
- (b) entered the United States without inspection over ten years ago and was not apprehended upon arrival, *id.* ¶ 2; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

11. After apprehending Mr. Rojas on or around November 10, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Rojas 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 Cristobal Sanchez Siquina

12. Petitioner Cristobal Sanchez 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 DHS on or around November 10, 2025, Sanchez Decl. ¶¶ 3–4;
- (b) entered the United States without inspection more than twenty years ago and was not apprehended upon arrival, *id.* ¶ 2; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

13. After apprehending Mr. Sanchez on or around November 10, 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. I.

Petitioner Jenifher De Los Angeles Rodriguez

14. Petitioner Jenifher De Los Angeles Rodriguez is a member of the Bond Denial Class, as she:

- (a) does not have lawful status in the United States and is currently detained at NWIPC after being apprehended by DHS on or around November 6, 2025, De Los Angeles Decl. ¶¶ 3–4;
- (b) entered the United States without inspection more than one year ago and was not apprehended upon arrival, *id.* ¶¶ 2–3; *see also* Ex. K; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

15. After apprehending Ms. De Los Angeles on or around November 6, DHS placed her in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Ms. De Los Angeles 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.

16. Upon information and belief, Ms. De Los Angeles is scheduled for a bond hearing before an IJ on December 3, 2025.

Petitioner Macario Bautista Sanchez

17. Petitioner Macario Bautista Sanchez 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 DHS on or around November 22, 2025, Bautista Decl. ¶¶ 3–4;
- (b) entered the United States without inspection more than twenty-five years ago and was not apprehended upon arrival, *id.* ¶ 2; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

18. After apprehending Mr. Bautista on or around November 22, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Bautista as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See id.* ¶¶ 2–5.

Santiago Dominguez Jimenez

19. Petitioner Santiago Dominguez Jimenez 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 DHS on or around November 22, 2025, Dominguez Decl. ¶¶ 3–4;
- (b) entered the United States without inspection more than twenty-five years ago and was not apprehended upon arrival, *id.* ¶ 2; *see also* Ex. K; and
- (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

20. After apprehending Mr. Dominguez on or around November 22, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Mr. Dominguez Jimenez 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 Jose Luis Carrillo Hernandez

21. Petitioner Jose Luis Carrillo 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 DHS on or around November 23, 2025, Carrillo Decl. ¶¶ 3–4;
- (b) entered the United States without inspection more than twenty-five years ago and was not apprehended upon arrival, *id.* ¶¶ 2–3; and

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

22. After apprehending Mr. Carrillo on or around November 23, DHS placed him in removal proceedings pursuant to 8 U.S.C. § 1229a. Upon information and belief, DHS has charged or will charge Mr. Carrillo as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. *See id.* ¶¶ 2–5.

23. The Court should expeditiously grant this petition.

24. 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.

25. The Court should accordingly order that within one day, Respondent DHS must release Petitioner Medina, 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.

26. 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

27. 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.

28. 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

29. Petitioner Juan Medina Ocampo was apprehended by immigration officers on October 26, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

30. Petitioner Rafael Alba Ceja was apprehended by immigration officers on or around November 18, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

31. Petitioner Joel Colindres Zamora was apprehended by immigration officers on or around November 6, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

32. Petitioner Adelaida Martinez Vazquez was apprehended by immigration officers on September 30, 2025, and is currently detained at NWIPC. She is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

33. Petitioner Edwin Rojas Montes was apprehended by immigration officers on or around November 10, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

34. Petitioner Cristobal Sanchez Siquina was apprehended by immigration officers on or around November 10, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

35. Petitioner Jenifher De Los Angeles Rodriguez was apprehended by immigration officers on November 6, 2025, and is currently detained at NWIPC. She is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

36. Petitioner Macario Bautista Sanchez was apprehended by immigration officers on November 22, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

37. Petitioner Santiago Dominguez Jimenez was apprehended by immigration officers on November 22, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

38. Petitioner Jose Luis Carrillo Hernandez was apprehended by immigration officers on November 23, 2025, and is currently detained at NWIPC. He is a member of the Bond Denial Class certified in *Rodriguez Vazquez*.

39. Respondent Laura Hermosillo is the Seattle Acting Field Office 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.

40. 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.

41. 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.

42. 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*

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

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

45. 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.

46. 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).

47. 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 Medina 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 Alba, Colindres, Martinez, Rojas, Sanchez, and De Los Angeles 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 26th 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

1 NORTHWEST IMMIGRANT
2 RIGHTS PROJECT
3 615 Second Ave., Suite 400
4 Seattle, WA 98104
5 (206) 957-8611

Counsel for Petitioners