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 9 **UNITED STATES DISTRICT COURT**  
 10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

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 13 Pedro VASQUEZ PERDOMO, Carlos  
 14 Alexander OSORTO, and Isaac VILLEGAS  
 15 MOLINA;

16 Petitioners,

17 v.

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 19 Kristi NOEM, Secretary, Department of  
 20 Homeland Security; Pam BONDI, Attorney  
 21 General; IMMIGRATION AND  
 22 CUSTOMS ENFORCEMENT; and Todd  
 23 LYONS, Acting Los Angeles Field Office  
 Director, Immigration and Customs  
 Enforcement.

24 Respondents.

Civil Case No.:

**PETITION FOR WRIT OF HABEAS  
 CORPUS AND COMPLAINT FOR  
 DECLARATORY AND  
 INJUNCTIVE RELIEF**

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1 **INTRODUCTION**

2 1. Petitioners were detained in Pasadena, California on June 18, 2025 for civil  
3 immigration violations and are currently being held at the B-18 processing office in  
4 downtown Los Angeles.

5 2. They were detained without reasonable suspicion, without an arrest warrant,  
6 and in violation of the immigration regulations and due process.

7 3. Petitioners face transfer outside of this judicial district and away from their  
8 family and legal representation. They also face imminent removal from the United States.

9 4. Petitioners seek an order from this Court that they be released from custody,  
10 and, in the interim, an order from the Court that they are not removed from this judicial  
11 district or removed from the United States, pending disposition of their petition for writ of  
12 habeas corpus.

13 **JURISDICTION AND VENUE**

14 5. This Court has jurisdiction under 28 U.S.C. § 2241 (federal habeas statute);  
15 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 2201-2 (declaratory judgment); United  
16 States Constitution Article I, Section 9 (Suspension Clause).

17 6. Venue properly lies within the Central District of California under 28 U.S.C.  
18 § 1391, because this is a civil action in which Respondents are agencies of the United  
19 States, Petitioners are detained in this district, and because a substantial part of the events  
20 or omissions giving rise to this action occurred in the District.

21 **PARTIES**

22 7. Petitioner Pedro Vasquez Perdomo resides in Pasadena, California and is  
23 currently detained at the Los Angeles downtown federal building in the basement, Room  
24 B-18.

25 8. Petitioner Carlos Alexander Osorto resides in Pasadena, California and is  
26 currently detained at the Los Angeles downtown federal building in the basement, Room  
27 B-18.



1 17. The agents had guns and were masked so that their faces could not be seen.  
2 They were acting aggressively, shouting at Petitioners. Petitioners were not free to leave  
3 the area.

4 18. Petitioners were petrified. Agents surrounded them and handcuffed them.

5 19. Respondents did not have reasonable suspicion that Petitioners were in the  
6 United States unlawfully.

7 20. After Petitioners were handcuffed, officers demanded Petitioners'  
8 identification.

9 21. Respondents did not have probable cause for Petitioners' arrest.

10 22. Respondents did not have warrants for Petitioners' arrest.

11 23. Respondents did not make an individualized finding of flight risk.

12 24. Respondents did not identify themselves as immigration agents and did not  
13 inform Petitioners of the basis for their arrest.

14 25. Petitioners were placed in the agents' vehicles and transported to the federal  
15 building at 300 North Los Angeles St. where they have been held in the basement, room  
16 B-18, since June 18, 2025.

17 26. Petitioners are being processed for removal proceedings to be removed from  
18 the United States.

19 27. Petitioners have representation in their removal proceedings. Their counsel  
20 is located in Pasadena, California.

21 28. Petitioners' family is location in Pasadena, California.

22 29. Petitioners face imminent transfer outside of this judicial district and face  
23 removal from the United States.

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**CAUSES OF ACTION**

**COUNT ONE**

***Violation of 8 U.S.C. § 1357(a)(2):***

***Warrantless Arrests Without Probable Cause of Flight Risk***

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

31. Respondents ICE arrested Petitioners without probable cause and without warrants. Before each arrest, Respondents failed to make an individualized finding of flight risk. The failure to meet these requirements is a violation of 8 U.S.C. § 1357(a)(2).

**COUNT TWO**

***Violation of 8 C.F.R. § 287.8(c)(2)(ii):***

***Warrantless Arrests Without Probable Cause of Flight Risk***

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

33. Respondents ICE arrested Petitioners without a warrant and without “reason to believe” that they were “likely to escape before a warrant can be obtained” in violation of 8 C.F.R. § 287.8(c)(2)(ii). The reason to believe standard meets the probable cause standard of the Fourth Amendment. *Perez Cruz v. Barr*, 926 F.3d 1128, 1137 (9th Cir. 2019).

34. Arrest in violation of the regulation is unlawful. *See Sanchez v. Sessions*, 904 F.3d 643, 650 (9th Cir. 2018); *Perez Cruz v. Barr*, 926 F.3d 1128, 1137 (9th Cir. 2019).

**COUNT THREE**

***Fourth Amendment: Arrests Without Probable Cause***

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



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**PRAYER FOR RELIEF**

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

- (1) Assume jurisdiction over this matter;
- (2) Declare that Petitioners are detained in violation of law;
- (3) Enjoin Respondents from transferring Petitioners outside of this judicial district during the pendency of removal proceedings;
- (4) Enjoin Respondents from removing Petitioners from the United States without the procedures for removal identified in the Immigration and Nationality Act;
- (5) Order the immediate release of Petitioners pending these proceedings;
- (6) Award costs and reasonable attorney fees incurred under this action under 28 U.S.C. § 2412, et. seq. (Equal Access to Justice Act); and
- (7) Grant any further relief that this Court may deem fit and proper.

Dated: June 20, 2025

Respectfully Submitted,  
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