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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

Jane DOE,

Plaintiff,

v.

CHRISTOPHER J. LaROSE, Senior Warden, Otay Mesa Detention Center; GREGORY J. ARCHAMBEAULT, Field Office Director of the San Diego Field Office of U.S. Immigration and Customs Enforcement; TODD M. LYONS, Acting Director of U.S. Immigration and Customs Enforcement; KRISTI NOEM, Secretary of the U.S. Department of Homeland Security; and PAMELA BONDI, Attorney General of the United States,

Respondents.

Case No. 25-cv-02201-BJC-JLB

TRAVERSE IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

I. INTRODUCTION

Plaintiff Jane Doe ("Ms. Doe") is a 48-year-old woman and victim of severe domestic violence who has lived in the United States for 40 years. She remains incarcerated by civil immigration authorities even though the sole conviction underlying her removal order was vacated as unconstitutional. The parties agree that after six months of detention the Department of Homeland Security ("DHS") bore the burden to justify further incarceration by clear and convincing evidence. Yet an Immigration Judge ("IJ") denied bond without hearing any testimony and despite DHS submitting no relevant evidence. The Board of Immigration Appeals ("BIA") affirmed with little reasoning.

Respondents concede that this Court has jurisdiction to review the IJ and BIA decisions. Their attempts to defend those decisions are unavailing. The agency made numerous errors: it failed to hold DHS to its burden, focused on alleged conduct by Ms. Doe from nearly two decades ago, ignored her recent rehabilitation efforts, and relied on arbitrary and discriminatory factors such as Ms. Doe's mental health disability. DHS has not shown by clear and convincing evidence that Ms. Doe's detention—which has now lasted 14 months and counting—is justified by an articulable danger or flight risk. The Court should grant the Petition.

II. FACTUAL AND PROCEDURAL HISTORY

The factual and procedural history in the Petition is substantively uncontested by Respondents. *See* ECF 1, ¶ 20–63; *compare* ECF 13, at 2–5.

Ms. Doe provides a procedural update: after the filing of the instant Petition, the Ninth Circuit reviewed Ms. Doe's motion for a stay of removal and granted a stay over the government's opposition. 2d Weiss Decl.; Exh. 13. The court thus believes Ms. Doe is likely to succeed in her petition for review. *Id.*; *Nken v. Holder*, 556 U.S. 418, 434 (2009) (stay factors include whether applicant "made a strong showing that [s]he is likely to succeed on the merits").

III. LEGAL STANDARDS

A. Clear and Convincing Evidence is a High Standard

Respondents do not contest that as a matter of due process and the *Aleman* injunction, the IJ was required to release Ms. Doe unless DHS established by clear and convincing evidence that

Ms. Doe is such a danger or flight risk that she must be detained. *See* ECF 1, ¶ 68; *Aleman Gonzalez v. Sessions*, 325 F.R.D. 616 (N.D. Cal. June 5, 2018); *Singh v. Holder*, 638 F.3d 1196, 1202–03 (9th Cir. 2011). "Establishing dangerousness [or flight risk] by clear and convincing evidence is a high burden and must be demonstrated in fact, not 'in theory.' *Obregon v. Sessions*, No. 17-cv-01463-WHO, 2017 U.S. Dist. LEXIS 60552 (N.D. Cal. Apr. 20, 2017), at *7 (citing *United States v. Patriarcha*, 948 F.2d 789, 792 (1st Cir. 1991)). The clear and convincing standard requires "an abiding conviction that the truth of [the] factual contentions at issue is highly probable." *Mondaca-Vega v. Lynch*, 808 F.3d 413, 422 (9th Cir. 2015) (en banc).

Pre-trial hearings under Bail Reform Act—where, like here, the government carries the burden to show danger by clear and convincing evidence—"offer IJ's the appropriate guidance in assessing whether the government has met its burden." *Obregon*, 2017 U.S. Dist. LEXIS 60552 at *19. In that context the government must prove that the detained individual "presents an identified and articulable threat to an individual or the community." *United States v. Salerno*, 481 U.S. 739, 747 (1987). "[A]ny doubts regarding the propriety of release should be resolved in favor of the [noncitizen]." *United States v. Motamedi*, 767 F.2d 1403, 1405 (9th Cir. 1985).

B. The Court Must Carefully Review the IJ and BIA Decisions

Respondents agree that this Court has habeas jurisdiction and may properly review the IJ and BIA decisions denying bond. *See* ECF 13, at 5–7; *Martinez v. Clark*, 124 F.4th 775, 779 (9th Cir. 2024). However, they overstate the deference to be applied to the agency.

First, the Court must consider *de novo* the legal question of whether the agency properly placed the burden of proof on DHS. *See Martinez*, 124 F.4th at 785 (the claim that the BIA applied the wrong burden of proof is a "question of law") (citing *Singh*, 638 F.3d at 1202–03 ("We also review de novo due process claims and questions of law raised in immigration proceedings")). By contrast, the "abuse of discretion" standard applies only when the question at issue "require[s] a close review of agency-found facts," such as whether the evidence satisfies a particular legal standard. *Id.* at 784. But whether the agency placed the burden on the correct party is a purely legal question. *Id.* at 785. And a reviewing court "do[es] not rely on the [BIA]'s invocation of the [correct] standard; rather, when the issue is raised, [the court's] task is to

determine whether the BIA faithfully employed" the burden of proof. *Rodriguez v. Holder*, 683 F.3d 1164, 1170, 1176 (9th Cir. 2012); *see also R.R.M.C. v. Decker*, No. 22 Civ. 2952 (LGS), 2022 U.S. Dist. LEXIS 179302, *11 (S.D.N.Y. Sept. 30, 2022). Here, as explained below, there were "red flags" that, despite lip service to the correct burden, the agency did not apply it. These include: the IJ's language indicating the burden was on Ms. Doe, misstatements of fact, and failure to mention highly probative evidence. *Cole v. Holder*, 659 F.3d 762, 771 (9th Cir. 2011).

Second, whether the evidence established dangerousness or flight risk is reviewed for abuse of discretion. *Martinez*, 124 F.4th at 782. While that does not involve "reweigh[ing] the evidence," the Court must ensure the IJ and BIA accounted for the demanding clear and convincing standard, and must determine whether the agency's decisions are "unsupported by sufficient evidence." *Y.S.G. v. Andrews*, No. 2:25-cv-1884-SCR, 2025 U.S. Dist. LEXIS 208276, at *29 (E.D. Cal. Oct. 22, 2025) (citing *Martinez*, 124 F.4th at 784). The agency also abuses discretion if it acts "arbitrarily, irrationally, or contrary to law" and when it "fails to provide a reasoned explanation for its actions." *Tadevosyan v. Holder*, 743 F.3d 1250, 1252–53 (9th Cir. 2014). The Court must "bear in mind that the government's discretion to incarcerate noncitizens is 'always constrained by the requirements of due process.'" *Y.S.G.*, 2025 U.S. Dist. LEXIS 208276, *29 (quoting *Hernandez v. Sessions*, 872 F.3d 976, 981 (9th Cir. 2017)).

IV. ARGUMENT

The IJ and BIA did not hold the government to its burden to justify further civil incarceration. Respondents' efforts to explain away the IJ's misstatements, ignorance of key rehabilitative evidence, and discriminatory treatment of Ms. Doe's mental health conditions are unavailing. Because the evidence does not establish by clear and convincing evidence that Ms. Doe poses a *current* articulable danger or flight risk, the Court should grant the Petition.

A. The IJ Improperly Shifted the Burden to Ms. Doe

IJ Partida's own language in the hearing and her bond memorandum show that she began from a presumption *against* release, rather than placing the burden on DHS to justify further detention. *See* ECF 1, ¶ 85–86. Respondents' attempt to explain away the IJ's choice of language makes no sense. They claim the IJ's statement she was "not convinced [Ms. Doe] will attend

future hearings," was "not a basis for the flight-risk finding" but rather an "explanation for rejecting Petitioner's arguments" about Ms. Doe's compliance with ICE check-ins. ECF 13, at 8; *see* ECF 1-2, at 188. But whether Ms. Doe would attend hearings is the heart of the flight risk assessment. *See Hernandez*, 872 F.3d at 990 (the purpose of immigration detention is limited to "protecting the public" and "ensuring that non-citizens in removal proceedings appear for hearings"). If the IJ was "not convinced" whether Ms. Doe would or wouldn't attend hearings, DHS had not met its burden to establish such flight risk that no bond could ensure her appearance. Similarly, the IJ's statement she was "unconvinced" by Ms. Doe's release plan shows she flipped the burden onto Ms. Doe. *See, e.g., R.R.M.C.*, 2022 U.S. Dist. LEXIS 179302, at *11; *Singh v. Garland*, 97 F.4th 597, 607 (9th Cir. 2024) (IJ's statement that noncitizen's evidence was "insufficient" showed the IJ improperly placed the burden on him instead of DHS).

The IJ also stated she had "broad discretion" in the bond decision. ECF 1-2 at 185. But as a judge in the Eastern District of California recently explained, while that "may be true in a generic bond proceeding under 8 U.S.C. § 1226…it is not true in a constitutionally mandated proceeding involving a heightened burden on DHS." *Y.S.G.*, 2025 U.S. Dist. LEXIS 208276, at *30 (citing *Martinez*, 124 F.4th at 784). Rather, if DHS failed to meet its burden, the IJ "would have had to release [her]." *Id.* "[T]he IJ's reference to broad discretion imported a legal standard at odds with" due process and the *Aleman* injunction. *Id.*

DHS did not present any evidence of flight risk or danger at the hearing, or even seek to question Ms. Doe. ECF 1, ¶ 87. In arguing DHS could meet the demanding clear and convincing burden without offering any relevant evidence, Respondents rely on language in 8 C.F.R. § 1003.19(d) that an IJ may rely on "any information that is available." ECF 13, at 9. But that regulation addresses *initial* IJ bond proceedings where the noncitizen bears the burden to obtain release. *See Matter of Guerra*, 24 I&N Dec. 37, 39 (BIA 2006). Here, DHS bore the burden to justify further incarceration. The BIA is clear that where the burden is on DHS, it must "carry such burden by presenting evidence." *Matter of Guevara*, 20 I&N Dec. 238, 244 (BIA 1991); *see also Navas v. INS*, 217 F.3d 646, 662 (9th Cir. 2000) (where DHS bore the burden to show changed circumstances it "failed to meet its evidentiary burden" by not producing evidence).

B. The IJ's Dangerousness Finding Failed to Hold DHS to the Clear and Convincing Standard and Was an Abuse of Discretion

The IJ also did not properly apply the demanding clear and convincing standard when assessing dangerousness. Respondents and the IJ focus primarily on events from more than 17 years ago while failing to explain how those alleged facts establish *present* danger. Further, the IJ entirely ignored that after Ms. Doe's 2023 brief relapse, state authorities released her to the community, where she successfully engaged in months of sobriety and treatment before immigration authorities interfered with her progress by arresting her at a scheduled check-in. The IJ's misstatements and failure to engage with this highly probative evidence was arbitrary, irrational, contrary to due process, and an abuse of discretion.

1. The IJ Did Not Consider Present Dangerousness

Civil detention must not be punitive. *United States v. Salerno*, 481 U.S. 739, 747 (1987). Immigration detention is only warranted to protect against *current* dangerousness or risk of flight, not to punish for past conduct. *See Ngo v. INS*, 192 F.3d 390, 398 (3d Cir. 1998). Respondents are correct that past convictions can *sometimes* justify the denial of bond—but only if, in light of their "extensiveness," "recency" and "seriousness," that conduct establishes that the noncitizen remains a *current* danger. *Singh*, 638 F.3d at 1206. What the IJ cannot do is deny bond based only on past dangerousness without considering present circumstances. *Id.* But that is what the IJ did here. The IJ explicitly stated that her "focus" was on "whether [Ms. Doe] *engaged* in conduct that *presented or* could present a danger to the community." ECF 1-2 at 186. By using this disjunctive construction, the IJ indicated she could deny bond even without a finding that Ms. Doe is likely to engage in dangerous conduct again. *Id.* Respondents cite no case approving of such a limited past-focused analysis.

The IJ then proceeded to analyze the case in a like manner. She spent three full paragraphs of her memorandum discussing Ms. Doe's vacated conviction stemming from incidents in 2006, nearly 20 years ago. ECF 1-2, at 185–86; *see also* ECF 1-2, at 174 (IJ Oral Decision) (stating that an allegation of child abuse from 2006 was "in of itself sufficient" to deny bond).[1] This "preoccup[ation] with an increasingly stale conviction history" indicates a failure to

[1] The IJ's recounting of these facts from a decade-old removal decision without viewing any of

consider present dangerousness. *Y.S.G.*, 2025 U.S. Dist. LEXIS 208276, at *32. Respondents, too, spill significant ink recounting alleged facts of incidents in 2001, 2006, and 2007 without acknowledging that these all took place more than 17 years before Ms. Doe's bond hearing. ECF 13, at 12–13. They also minimize the context: Ms. Doe's struggle to raise her children—who are all now adults—under the shadow of extreme domestic violence. *See* ECF 1-2, at 88 (describing how Ms. Doe's ex-boyfriend raped, punched, and suffocated her, tied her up in a closet, and threatened to burn her alive); *id.* at 139–48 (criminal complaints and restraining order against ex-boyfriend). Though the IJ mentioned this context in passing, she never explained *why* it did not mitigate any current dangerousness. *See* ECF 1-2, at 187; *see Y.S.G.*, 2025 U.S. Dist. LEXIS 208276, at *33 ("The IJ did not actually analyze any of this evidence or attempt to explain why it did not mitigate danger"). An "IJ must also consider whether the [detained person's] circumstances have changed such that criminal conduct is now less likely." *Calderon Rodriguez v. Wilcox*, 374 F. Supp. 3d 1024, 1033 (W.D. Wash. 2019) (citing *Singh*, 638 F.3d at 1205). Ms. Doe has taken responsibility for her mistakes as a mother, and no longer cares for any children. ECF 1-2, at 90. Neither the IJ nor Respondents explain why her past negligence "toward children who have been under her care" portends dangerousness *now*. ECF 1-2, at 187.

The IJ's brief references to Ms. Doe's 2023 alcohol use relapse and conviction—after 15 years without incident—are insufficient to show current dangerousness. *Id.* at 92. DHS submitted no evidence about this incident whatsoever, and declined to question Ms. Doe about it. And *after* state authorities released Ms. Doe, she was successfully living in the community and working with mental health providers for approximately eight months before ICE detained her in September 2024. *Id.* Neither Respondents nor the IJ identify any articulable, specific threat that Ms. Doe *currently* poses. *See Salerno*, 481 U.S. at 747.

2. The IJ Ignored Ms. Doe's Recent Rehabilitation and Release Plan

The IJ also ignored and mischaracterized Ms. Doe's rehabilitation efforts—including eight months of consistent psychotherapy and two years of sobriety—immediately preceding her

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the underlying evidence was problematic not only because the burden was on Ms. Doe in the prior hearing, ECF 1, ¶ 89, but also because Ms. Doe's intellectual disability limited her ability to fully participate in that hearing, ECF 1-2, at 110, a fact the IJ entirely ignored.

abrupt detention by ICE. ECF 1, ¶ 97-98. Respondents do not even attempt to claim otherwise, instead arguing that the IJ was "not required to discuss each piece of evidence submitted." ECF 13, at 15. But recent rehabilitation efforts are "highly probative" evidence in determining current danger. *Cole*, 659 F.3d at 771 (although the BIA need not discuss "each piece" of evidence, its "fail[ure] to mention highly probative or potentially dispositive" evidence is legal error). "Meaningful evaluation of mitigation evidence is necessary to ensure that the high burden of the clear and convincing standard is demonstrated in fact, not in theory." *Y.S.G.*, 2025 U.S. Dist. LEXIS 208276, *34 (quotations omitted). The IJ engaged in no such evaluation here. Instead, the IJ's decision rests on the incorrect belief that Ms. Doe was detained by ICE immediately after the 2023 incident, when in fact she was successfully living in the community and complying with treatment for months prior. ECF 1, ¶ 98; *see also* ECF 1-2, at 188 (noting erroneously that Ms. Doe's relapse "eroded those strides" she had made with St. Mary's, even though Ms. Doe began receiving St. Mary's services *after* her release from criminal custody in 2024 and has remained sober since). Respondents do not contest this mistake. *See generally* ECF 13.

Respondents instead misdirect by noting that Ms. Doe's brief rehabilitation classes years ago did not completely cure her alcohol use disorder, but they and the IJ again ignore the context: at that time she remained in a volatile domestic abuse situation, and did not yet have the resources to support her recovery. ECF 1-2, at 88–91, 142. By contrast, after her 2023 relapse made Ms. Doe realize she needed further assistance, she immediately sought out and consistently attended therapy. *Id.* at 92. She relied on the support of her U.S. citizen husband and began working with a case worker at St. Mary's. *Id.* at 120, 122. And she is committed to attending residential treatment through Gospel Center. *Id.* at 117; *Obregon*, 2017 U.S. Dist. LEXIS 60552, at *23-25 (noting petitioner's prior unsuccessful efforts and that while recovery from substance abuse is a long-term journey, a "viable plan for rehabilitation" negates dangerousness). DHS declined the opportunity to ask Ms. Doe about her release plan and made no showing it is insincere. On the contrary, her most recent history of treatment shows Ms. Doe is ready and willing to address her substance abuse history and was doing so when ICE detained her. The IJ's mistakes and failure to mention this evidence was legally erroneous and an abuse of discretion.

C. The IJ's Flight Risk Determination is Legally and Factually Erroneous

The IJ's alternative decision on flight risk is also arbitrary, irrational, and an abuse of discretion. Specifically, the IJ relied on her misunderstanding that Ms. Doe's long record of appearance at ICE appointments was "prior to her removal order being final." ECF 1-2, at 174. Not so: Ms. Doe's removal order became final in 2011 and Ms. Doe repeatedly appeared the ICE appointments afterward, including the one at which she was detained in 2024. ECF 1, ¶ 105. Respondents ignore this glaring error. They also ignore that the IJ mischaracterized the timeline of Ms. Doe's efforts at seeking permanent housing, which she was actively pursuing when she was suddenly re-detained by ICE. *See* ECF 1, ¶ 107. Instead, they defend the IJ's reference to Ms. Doe's struggles with housing, mental health conditions, and alcohol as justifying "concern" about her future compliance. ECF 13, at 16. But these factors were present previously, and Ms. Doe nevertheless appeared at ICE when requested. Further, the IJ and Respondents ignore that after the December 2024 vacatur of her conviction, Ms. Doe's removal order *has no valid legal basis*, so she has a heightened incentive to appear and pursue restoration of her lawful permanent resident status. In any case, the IJ's "concerns" do not meet DHS's burden to show by clear and convincing evidence that Ms. Doe poses such great risk of flight that no bond or other conditions could assure her appearance. Point A, *supra*; *R.R.M.C.*, 2022 U.S. Dist. LEXIS 179302, at *13.

D. The Agency's Reliance on Mental Health Conditions Was Discriminatory

Respondents do not contest that the IJ and BIA used Ms. Doe's mental health disability as a negative factor. ECF 1, ¶ 110–12. They claim that disparate treatment of those with mental health disabilities is permissible in bond proceedings, misleadingly citing *Zadvydas*, 533 U.S. at 691. ECF 13, at 17. But the Ninth Circuit has rejected Respondents' argument. *Thai v. Ashcroft*, 366 F.3d 790, 795 (9th Cir. 2004). As the court there explained, *Zadvydas*'s point was that civil detention is *only* permissible under limited and "special circumstances"—such as civil commitment schemes—with "strong procedural protections," not that mental illness is a basis for immigration detention. *Id.*; *Zadvydas*, 533 U.S. at 691. The Court's citation to *Kansas v. Hendricks*, 521 U.S. 346 (1997), that Respondents rely upon emphasized that civil confinement based on mental illness is *only* constitutional if applied to a "small segment of particularly dangerous individuals" and "strict procedural safeguards" are provided. *Id.* In *Hendricks*,

sexually violent predators were entitled to government-provided counsel, a mental health examination, regular review of whether detention remained warranted, and treatment while in custody. *Hendricks*, 521 U.S. at 367–68. The Supreme Court has never endorsed using mental illness to justify *immigration* detention—where none of the *Hendricks* protections are provided.[2]

And even if it were constitutionally permissible to rely on Ms. Doe's mental disability to deny an immigration bond, that says nothing about whether it violates the Rehabilitation Act. In passing that statute, Congress specifically found that "individuals with disabilities constitute one of the most disadvantaged groups in society" and "continually encounter various forms of discrimination in such critical areas as…institutionalization, health services,…and public services." 29 U.S.C. § 701; *see also* 42 U.S.C. § 12101(a)(2) (identifying "isolat[ion] and segregat[ion]" of people with disabilities as "forms of discrimination"). Individuals with disabilities must have "equal opportunity" to obtain federal benefits such as release on bond. *Alexander v. Choate*, 469 U.S. 287, 300–02 n.21 (1985). Here, the agency's conclusion that Ms. Doe's mental conditions make her situation "precarious," without actually assessing the facts of those conditions, was discriminatory. ECF 1-2, at 188. In fact, *despite* her intellectual disability and history of being unhoused, the record shows Ms. Doe has complied with ICE directives. *Id.* at 92, 120. As the Supreme Court has explained, "institutional placement of persons who can handle and benefit from community settings" constitutes disability discrimination, as it "perpetuates unwarranted assumptions that persons so isolated are incapable or unworthy of participating in community life." *Olmstead v. L.C. by Zimring*, 527 U.S. 581, 600 (1999). The agency's use of Ms. Doe's mental health conditions as reason to keep her incarcerated relied on such unwarranted assumptions, in violation of Section 504 and its implementing regulations.

E. The Agency Is Not a Neutral Adjudicator

Since Ms. Doe filed this petition, newly publicized accounts support her contention that IJs and the BIA are under extreme pressure by DOJ superiors to decide cases in a biased way

[2] To the extent Respondents believed that Ms. Doe's mental health conditions make her particularly dangerous, they should have followed the proper procedures to seek civil commitment under California State law, which include significant procedural protections. *See* Cal. Wel. & Inst. Code § 5150, 5300. It is uncontested they have not done so.

against noncitizens. *See, e.g.,* 2d Weiss Decl, Exh. 14, Hilda Gutierrez, et al., "Former judges give inside look at immigration court upheaval," *NBC Bay Area* (Oct. 20, 2025) ("You felt you had to rule a certain way in order to preserve your job."); *Id.*, Exh. 15, Marco Poggio, "Judges See an Immigration Court Gutted From Inside," *Law360* (Oct. 31, 2025) ("We were told to facilitate deportation…Due process is dead in immigration courts.").

Further, contrary to Respondents' contention, there *is* evidence such bias was at play here. Although DHS bore the burden of proof, it presented no evidence and made few arguments. The IJ denied bond after a hearing that took minutes, at which no witnesses testified. ECF 1-2 at 165–75. She came up with arguments on DHS's behalf, and made misstatements that supported DHS's position. The BIA, for its part, provided no analysis in upholding the bond decision. *See* ECF 1-2, at 235. The IJ and BIA decisions are consistent with a context in which adjudicators are predisposed to keep noncitizens detained rather than provide a full and fair, unbiased hearing.

F. Proper Relief

Because DHS failed to meet its burden to show flight risk or danger by clear and convincing evidence, the Court should order Ms. Doe released. *Judulang v. Chertoff*, 562 F. Supp. 2d 1119, 1127 (S.D. Cal. 2008) (ordering release when evidence failed to establish flight risk or danger); *Mau v. Chertoff*, 562 F. Supp. 2d 1107, 1119 (S.D. Cal. 2008); *Hechavarria*, 358 F. Supp. 3d 227, 243 (W.D.N.Y. 2019); *see also Parada v. Sessions*, 902 F.3d 901, 914 (9th Cir. 2018) (where the government fails to meet its burden, providing it another opportunity would be "exceptionally unfair"). Alternatively, Ms. Doe is entitled to a constitutionally compliant custody hearing, which should be conducted before this Court. *See, e.g., L.G.M. v. Larocco*, 2:25-cv-2631 (PKC), 2025 U.S. Dist. LEXIS 144418, at *13 (E.D.N.Y. June 25, 2025); *Leslie v. Holder*, 865 F. Supp. 2d 627, 633 (M.D. Pa. 2012) ("[W]e are empowered to conduct bail proceedings in habeas corpus proceedings brought by immigration detainees") (citing cases)).

V. CONCLUSION

For the foregoing reasons, the Court should grant the Petition and order Ms. Doe released, or in the alternative, hold a custody hearing where the government bears the burden of justifying further detention by clear and convincing evidence.

Respectfully submitted,

Date: November 12, 2025

/s/ Peter Okie Weiss
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