

Eastern District of Kentucky  
FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF KENTUCKY

OCT 15 2025

AT COVINGTON  
Robert R. Carr  
CLERK U.S. DISTRICT COURT

TEJINDER SINGH,

*Petitioner,*

v.

**KRISTI NOEM**, in her official capacity as  
Secretary of the Department of Homeland  
Security; **PAMELA BONDI**, in her official  
capacity as Attorney General of the United  
States; **TODD LYONS**, in his official  
capacity as Acting Director and Senior  
Official Performing the Duties of the  
Director of U.S. Immigration and Customs  
Enforcement; **SAMUEL OLSON**, in his  
official capacity as Field Office Director  
for U.S. Immigration and Customs  
Enforcement, Enforcement and Removal  
Operations; **MARC FIELDS**, in his  
official capacity as County Jailer of  
Kenton County Detention Center,

*Respondents.*

Case No. 25-157-DCR

**PETITION FOR WRIT OF  
HABEAS CORPUS**

**INTRODUCTION**

1. Petitioner, Tejinder Singh, left India to escape political persecution and entered the United States in 2017. Since coming to the United States, Petitioner has been a pivotal member of his community. He opened and operated two gas stations and was in the process of building a third one until he was recently detained. He has also consistently paid his state and federal taxes and regularly participates in Sikh religious and community events.

2. On July 18, 2025, Indianapolis Immigration and Customs Enforcement (“ICE”) officers targeted and arrested Petitioner and took him into custody.

3. Petitioner is subject to pre-final order of removal detention under 8 U.S.C. § 1226(a). Noncitizens detained under section 1226(a) are subject to discretionary detention and can request a change in custody redetermination (i.e., bond hearing) with an Immigration Judge (“IJ”). However, on July 8, 2025, DHS issued an internal Interim Guidance (“Policy”) that took the baseless position that—contrary to statutory principles and governing case law—noncitizens like Petitioner who entered the United States without permission or parole are subject to mandatory detention under 8 U.S.C. § 1225(b) instead of discretionary detention under section 1226(a). On September 5, 2025, the Board of Immigration Appeals (“BIA”) issued a decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025) that sided with DHS’ position.

4. Since Petitioner entered the United States without permission or parole, he is subject to detention under 8 U.S.C. § 1226(a). Noncitizens detained under section 1226(a) are subject to discretionary detention and can file a request for a bond hearing with an Immigration Judge (“IJ”). However, DHS has adopted a new baseless position claiming that—contrary to statutory principles and governing case law—noncitizens like Petitioner who entered the United States without permission or parole are actually subject to mandatory detention under 8 U.S.C. § 1225(b) instead of section 1226(a).

5. Petitioner’s continued detention without a bond hearing violates Petitioner’s Fifth Amendment Due Process rights and the Immigration and Nationality Act (“INA”). DHS’ Policy has upended decades of DHS’ own interpretation of bond eligibility under sections 1226(a) and 1225(b). Nearly every district court that has addressed this issue (including at least one in this district) has rejected DHS’ unfounded position and granted habeas relief. For the foregoing reasons, the Court should grant habeas relief and direct Respondents to release

Petitioner, or in the alternative promptly provide him with a constitutionally adequate bond hearing § 1226(a) within seven days.

### JURISDICTION

6. This action arises under the Constitution of the United States and the Immigration and Nationality Act (“INA”), 8 U.S.C. § 1101 *et seq.*

7. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

8. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

9. Federal district courts have jurisdiction to hear habeas claims brought by noncitizens challenging the lawfulness of their detention. *See Demore v. Kim*, 538 U.S. 510, 516–17 (2003) (recognizing habeas jurisdiction over immigration detention challenges); *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001) (same); *Soberanes v. Comfort*, 388 F.3d 1305, 1310 (10th Cir. 2004) (“Challenges to immigration detention are properly brought directly through habeas.”).

10. No petition for a writ of habeas corpus has previously been filed in any court regarding Petitioner.

### VENUE

11. Venue is proper because Petitioner is detained at Kenton County Detention Center in Covington, Kentucky, which is within the jurisdiction of this District. Venue is also proper in this District because Respondents are officers, employees, or agencies of the United States. *See* 28 U.S.C. §§ 1391(b) and (e)(1) *see also United States v. Scott*, 803 F.2d 1095, 1096

(10th Cir. 1986) (“A § 2241 petition for a writ of habeas corpus must be addressed to the federal district court in the district where the prisoner is confined.”).

**PARTIES**

12. Petitioner is currently detained at Kenton County Detention Center in Covington, Kentucky, and is in the custody, and under the direct control, of Respondents and their agents.

13. Respondent **Kristi Noem** is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (“DHS”). In this capacity, Respondent is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees U.S. Immigration and Customs Enforcement, the component agency responsible for Petitioner’s detention and custody. Respondent is a legal custodian of Petitioner.

14. Respondent **Pamela Bondi** is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review (EOIR), which administers the immigration courts and the BIA. Respondent is a legal custodian of Petitioner.

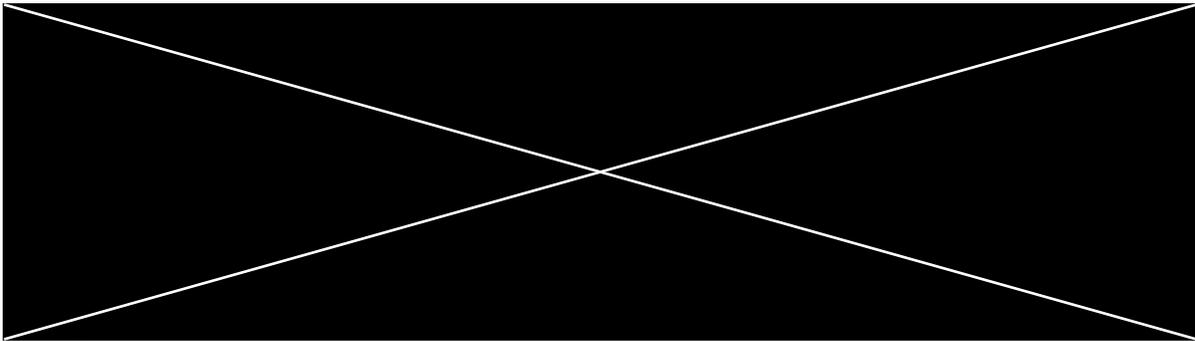
15. Respondent **Todd Lyons** is sued in his official capacity as the Acting Director of the U.S. Immigration and Customs Enforcement. Respondent is a legal custodian of Petitioner and has authority to release him.

16. Respondent **Samuel Olson** is named in his official capacity as the Field Office Director for the ICE Chicago Field Office. As Field Office Director, Respondent oversees ICE’s enforcement and removal operations in Illinois, Indiana, and Kentucky. As such, he is a legal custodian of Respondent.

17. Respondent **Marc Fields** is the Jailer of Kenton County Detention Center, and he has immediate physical custody of Petitioner pursuant to the facility's contract with U.S. Immigration and Customs Enforcement ("ICE") to detain noncitizens and is a legal custodian of Petitioner. Respondent is a legal custodian of Petitioner.

**STATEMENT OF FACTS**

18. Petitioner left India in 2017 to escape political persecution. Beginning in 2016,



19. On July 25, 2017, Petitioner entered the United States by crossing the U.S.–Mexico border. Petitioner was detained by ICE under its general discretionary detention authority under 8 U.S.C. § 1226(a).

20. On August 4, 2017, Petitioner was served with a Notice to Appear ("NTA") charging him with removability pursuant to section 212(a)(6)(A)(i) of the INA, alleging that Petitioner was "an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General." Ex. A, NTA. The NTA designated Petitioner as an "alien present in the United States who has not been admitted or paroled." *Id.*

21. Shortly thereafter, Petitioner filed a request for a bond hearing with the immigration court. On August 18, 2017, an immigration judge found that Petitioner had

demonstrated that he was not a danger to the community or a risk of flight and ordered him released on a bond in the amount of \$10,000. *See* Ex. B, [2017 BOND ORDER].

22. Petitioner paid the bond and was released from ICE custody on or about August 21, 2027. His removal proceedings were subsequently transferred to the immigration court's non-detained docket.

23. On December 11, 2017, Petitioner filed a Form I-589 Application for Asylum based on the above-referenced political persecution.

24. Since coming to the United States, Petitioner has opened and operated two gas stations and was in the process of building a third one until he was detained. He also owns two homes and a vacant lot where the new gas station is planned to be built. He has also consistently paid his state and federal taxes and regularly participates in Sikh religious and community events. Petitioner is married to a United States Citizen ("USC") and has one USC child. *See* Ex. C, [Marriage Certificate].

25. On September 26, 2022, Petitioner was convicted in the Shelby Superior Court for the offense of operating a vehicle intoxicated. *See* Ex. D, Count 1 OVWI-Endangering a Class A misdemeanor. As a result of his conviction, Petitioner was sentenced to 2 days of incarceration. On or about September 27, 2022, Petitioner was released from state custody. Petitioner has not had any encounters with law enforcement since then.

26. In addition to his pending asylum application, Petitioner is the beneficiary of an approved Form I-130 Petition for Alien Relative filed on his behalf by his U.S. citizen sister. On June 3, 2023, Petitioner's sister filed the I-130. The application was approved on April 28, 2025. *See* Ex. E, I-130 Approval Notice.

27. On July 18, 2025, Indianapolis ICE officers targeted and arrested Petitioner and took him into custody. *See* Ex. F, Form I-213 Record Deportable/Inadmissible Alien.

28. Since July 18, 2025, Petitioner has been detained in Indian and later transferred to Kenton County Detention Center.

29. On September 05, 2025, Petitioner filed a request for a custody redetermination hearing (i.e., bond hearing) with the immigration court. However, on September 5, 2025, the BIA issued a precedential decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025) holding that, based on the plain language of 8 U.S.C. § 1225(b)(2)(A), IJs lack authority to hear bond requests or to grant bond to noncitizens who are present in the United States without admission.

30. On September 29, 2025, IJ Kelly Johnson issued a decision denying bond based on *Matter of Yajure Hurtado* and held that “this Court lacks authority to hear bond request or to grant bond to aliens who are present in the United States without admission.” IJ Johnson went on to state that “[i]n the alternative” he denied bond because Petitioner is a danger to the community and a risk of flight. IJ Johnson, quoting from the criminal conviction record, IJ Johnson did not engage in any facts in reaching this “alternative” finding and could not legally do so without jurisdiction.

#### **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

31. Petitioner has no administrative remedies to exhaust.

32. Petitioner's request for custody redetermination was denied due to a lack of jurisdiction. As such, Petitioner's continued detention in ICE custody cannot be challenged by way of bond proceedings before the Immigration Judge.

33. Therefore, a writ of habeas corpus is the sole avenue to vindicate his constitutional, statutory, and regulatory rights and restore his liberty.

### **LEGAL FRAMEWORK**

34. The INA prescribes three basic forms of detention for noncitizens in removal proceedings. First, 8 U.S.C. § 1226(a) authorizes the detention of noncitizens in standard non-expedited removal proceedings before an IJ. *See* 8 § 1226(a); 8 U.S.C. § 1229a. Individuals in section 1226(a) detention are entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, *see* 8 U.S.C. § 1226(c).

35. Second, the INA provides for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission referred to under 8 U.S.C. § 1225(b)(2).

36. Finally, the Act also provides for detention of noncitizens who have been previously ordered removed, including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b).

37. The detention provisions at section 1226(a) and 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act (“IIRIRA”) of 1996, Pub. L. No. 104–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section 1226(c) was most recently amended earlier this year by the LRA, Pub. L. No. 119-1, 139 Stat. 3 (2025).

38. Following enactment of the IIRIRA, the Executive Office of Immigration Review drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under section 1225 and that they were instead detained under section 1226(a). *See* *Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures*, 62 Fed. Reg. 10312,

10323 (Mar. 6, 1997). In the decades that followed, most noncitizens who entered without inspection—unless they were subject to some other detention authority—received bond hearings. This practice was also consistent with the practice prior the enactment of the IIRIRA, in which noncitizens who were not deemed “arriving” were entitled to a custody hearing before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that section 1226(a) simply “restates” the detention authority previously found at section 1252(a)).

39. On July 8, 2025, DHS issued a memo to all employees of Immigration and Customs Enforcement (“ICE”) stating that “[t]his message serves as notice that DHS, in coordination with the Department of Justice (DOJ), has revisited its legal position on detention and release authorities. DHS has determined that section 235 of the Immigration and Nationality Act (INA) [8 U.S.C. § 1225], rather than section 236 [8 U.S.C. § 1226], is the applicable immigration detention authority for all applicants for admission. The following interim guidance is intended to ensure immediate and consistent application of the Department’s legal interpretation while additional operational guidance is developed.” The memo further stated DHS’ new position with regard to custody determinations as follows:

An “applicant for admission” is an alien present in the United States who has not been admitted or who arrives in the United States, whether or not at a designated port of arrival. INA § 235(a)(1). **Effective immediately, it is the position of DHS that such aliens are subject to detention under INA § 235(b) and may not be released from ICE custody except by INA § 212(d)(5) parole.** These aliens are also ineligible for a custody redetermination hearing (“bond hearing”) before an immigration judge and may not be released for the duration of their removal proceedings absent a parole by DHS. For custody purposes, these aliens are now treated in the same manner that “arriving aliens” have historically been treated. **The only aliens eligible for a custody determination and release on recognizance, bond, or other conditions under INA § 236(a) during removal proceedings are aliens admitted to the United States and chargeable with deportability under INA § 237, with the exception of those subject to mandatory detention under INA § 236(c).**

Moving forward, ICE will not issue Form I-286, Notice of Custody Determination, to applicants for admission because Form I-286 applies by its terms only to custody determinations under INA § 236 and part 236 of Title 8 of the Code of Federal Regulations. With a limited exception for certain habeas petitioners, on which the Office of the Principal Legal Advisor (OPLA) will individually advise, if Enforcement and Removal Operations (ERO) previously conducted a custody determination for an applicant for admission still detained in ICE custody, ERO will affirmatively cancel the Form I-286.

See <https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission> (last accessed August 4, 2025) (emphasis original).

40. As a result, DHS now considers *all* noncitizens who have entered the United States without inspection and are subject to the grounds of inadmissibility, including long-time U.S. residents, are now considered to be subject to mandatory detention under section § 1225(b) and ineligible for release on bond. Conversely, according to DHS “[t]he only aliens eligible for a custody determination and release on recognizance, bond, or other conditions under INA § 236(a) [8 U.S.C. § 1226(a)] during removal proceedings are aliens admitted to the United States and chargeable with deportability under INA § 237, with the exception of those subject to mandatory detention under INA § 236(c) [8 U.S.C. § 1226(c)].” *Id.*

41. On September 5, 2025, the BIA issued a precedential decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025) holding that, based on the plain language of 8 U.S.C. § 1225(b)(2)(A), IJs lack authority to hear bond requests or to grant bond to noncitizens who are present in the United States without admission.

## **CLAIMS FOR RELIEF**

### **COUNT ONE**

#### **Violation of Fifth Amendment Right to Due Process**

42. The allegations in the above paragraphs are realleged and incorporated herein.

43. Petitioner is challenging DHS' unlawful custody determination that Petitioner is subject to detention under 8 U.S.C. § 1225(b) and is ineligible for bond.

44. Petitioner is also challenging his continued detention without a bond hearing.

45. Respondents have violated Petitioner's due process rights under the Fifth Amendment by detaining him without possibility of release on bond. Mandatory detention under section 1225(b) and denial of a bond hearing constitutes a violation of the Fifth Amendment's guarantee of due process.

46. Petitioner has a constitutionally protected interest in procedural due process in their removal proceedings and applications for relief.

47. As a remedy, the Court should order him released from detention, or alternatively direct that an IJ hold a constitutionally adequate bond hearing.

48. In addition, IJ Johnson's September 29, 2025, Order denying bond is not a constitutionally adequate hearing. IJ Johnson's "alternative" bond finding that Petitioner is a danger to the community and risk of flight violates the INA because it goes beyond the jurisdictional threshold issue and consists of an advisory and *ultra vires* decision that was made without a proper hearing and without consideration of virtually any evidence in the record or arguments from counsel of record.

49. As a remedy, the Court should order Petitioner's release on his own recognizance, or in the alternative order that a bond hearing be scheduled immediately.

## **COUNT TWO**

### **Violation of the Immigration and Nationality Act ("INA") and Administrative Procedure Act ("APA")**

50. The allegations in the above paragraphs are realleged and incorporated herein.

51. The Administrative Procedure Act provides that courts “shall . . . hold unlawful and set aside agency action” that is “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A).

52. The arbitrary and capricious detention of Petitioner, despite his pending I-589 and approved I-130, causes him irreparable harm with each day he remains detained. For the reasons articulated above, this Court should find that any decision to detain Petitioner is arbitrary, capricious, and unsupported by substantial evidence. *See* 5 U.S.C. §§ 706(2)(A), (E) (The reviewing court “shall ... hold unlawful and set aside agency action, findings, and conclusions found to be ... arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law,” or “unsupported by substantial evidence.”).

53. Application of 8 U.S.C. § 1225(b) to Petitioner is a violation of the INA because he is instead subject to discretionary detention under 8 U.S.C. § 1226(a).

54. Therefore, DHS’ July 8, 2025 Policy and the BIA’s decision in *Matter of Yajure Hurtado* violate the INA because they deprive Petitioner of a statutorily entitled bond hearing.

55. In addition, IJ Johnson’s September 29, 2025, Order denying bond is not a constitutionally adequate hearing. IJ Johnson’s “alternative” bond finding that Petitioner is a danger to the community and risk of flight violates the INA because it goes beyond the jurisdictional threshold issue and consists of an advisory and *ultra vires* decision that was made without a hearing and without consideration of virtually any evidence in the record or arguments from counsel of record.

**COUNT THREE**

**Violation of The Fourth Amendment of The Constitution And 8 U.S.C. § 1357(A)(2)**

56. Petitioner repeats and incorporates by reference each allegation contained in the preceding paragraphs as if fully set forth herein.

57. The Fourth Amendment protects “[t]he right of the people to be secure in their persons . . . against unreasonable searches and seizures.” U.S. Const. amend. IV. The Supreme Court has consistently recognized that immigration arrests and detentions are “seizures” within the meaning of the Fourth Amendment. *INS v. Lopez-Mendoza*, 468 U.S. 1032, 1044 (1984) (acknowledging that deportation proceedings are civil, but the Fourth Amendment still applies to the “seizure” of the person).

58. As a general matter, the Fourth Amendment requires that all arrests entail a neutral, judicial determination of probable cause. *See Gerstein v. Pugh*, 420 U.S. 103, 114 (1975). That neutral, judicial determination can occur either before the arrest, in the form of a warrant, or promptly afterward, in the form of a prompt judicial probable cause determination. *See id.* Arrest and detention of a person, including of a noncitizen, absent a neutral judicial determination of probable cause, violates the Fourth Amendment of the Constitution. *Id.*; see also *Cnty. of Riverside v. McLaughlin*, 500 U.S. 44, 57 (1991). This determination must occur within 48 hours of detention, which includes weekends, unless there is a bond fide emergency or other extraordinary circumstances. *See Cnty. of Riverside v. McLaughlin*, 500 U.S. 44, 57 (1991).

59. Congress enacted a strong preference that immigration arrests be based on warrants. *See Arizona v. United States*, 567 U.S. 387, 407–08 (2012). The Immigration and Nationality Act thus provides immigration officers with only limited authority to conduct warrantless arrests. 8 U.S.C. § 1357(a)(2). Specifically, an officer must have “reason to believe” the person is violating the immigration laws and that the person “is likely to escape before a warrant can be obtained.” *Id.* Federal regulations track the strict limitations on warrantless arrests. *See* 8 C.F.R. § 287.8(c)(2)(ii).

60. Here, at the moment of seizure, Petitioner had filed an I-589 and had an approved I-130. He has lived in the United States for over 8 years, and there is no evidence or reason to believe that he posed a flight risk at the time of his apprehension.

61. Therefore, no officer could hold a reasonable belief that Petitioner was likely to escape before a warrant could be obtained. *See* 8 U.S.C. § 1357(a)(2).

62. Without a statutory basis to arrest, the Government is required under the Fourth Amendment to secure a prompt judicial probable cause determination to continue holding Petitioner. *Gerstein*, 420 U.S. at 114; *McLaughlin*, 500 U.S. at 56–57. Petitioner received no such judicial determination, yet his detention has continued well beyond 48 hours, rendering his detention presumptively unconstitutional.

63. The Government cannot salvage this seizure by invoking generalized immigration enforcement interests. The Fourth Amendment's reasonableness inquiry is fact-specific and demands individualized justification for both the arrest and the extended detention. *See United States v. Brignoni-Ponce*, 422 U.S. 873, 882–84 (1975); *Gerstein*, 420 U.S. at 114. Here, Petitioner has a pending I-589 and an approved I-130. He committed no crime justifying his apprehension on July 18, 2025. He fled no authority. He posed no danger to any person or to the community at large.

64. Petitioner's warrantless arrest occurred in violation of the clear, narrow circumstances permitted by statute. Therefore, his arrest and ensuing detention constitute an unreasonable and unlawful seizure in violation of the Fourth Amendment.

#### **COUNT FOUR**

##### **Violation of The *Accardi* Doctrine with Respect To 8 C.F.R. § 287.8(C)(2)(i) and (ii)**

65. Petitioner repeats and incorporates by reference each allegation contained in the preceding paragraphs as if fully set forth herein.

66. The United States has also failed to follow immigration-specific arrest and processing regulations. Regulations governing immigration enforcement require that warrantless arrests conform to the standards in 8 C.F.R. § 287.8(c). Specifically, for any arrest, immigration officers must have reason to believe that an individual committed an offense against the United States or was present illegally. 8 C.F.R. § 287.8(c)(2)(i). And, for a warrantless arrest, officers must also have reason to believe that an individual is “likely to escape before a warrant can be obtained.” 8 C.F.R. § 287.8(c)(2)(ii).

67. At the time of the arrest and at all times since, Petitioner had a valid pending I-589 and approved I-130; he fled no authority; and he posed no danger to any person or to the community at large. Therefore, Petitioner's arrest and continued detention contravene regulations governing immigration arrests in violation of the *Accardi* doctrine

**PRAYER FOR RELIEF**

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Pursuant to 28 U.S.C. § 2243, issue an order to show cause directing Respondents to file a return within three (3) days, absent good cause for a short extension not exceeding ten days, and set the matter for a prompt hearing;
- (3) Enjoin Respondents from transferring Petitioner during the pendency of the instant action;
- (4) Declare that Petitioner's continued detention violates the Immigration and Nationality Act, 8 U.S.C. § 1226(a); the Administrative Procedure Act, 5 U.S.C. § 706(2)(A); and/or the Due Process Clause of the Fifth Amendment to the U.S. Constitution;
- (5) Grant the writ of habeas corpus and order Petitioner's immediate release from ICE custody;
- (6) In the alternative order, a constitutionally adequate bond hearing at which DHS bears the burden of proving that Petitioner is a danger to the community or risk of flight, or other reasonable conditions of supervision;
- (7) Award Petitioner his costs and reasonable attorneys' fees pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412, and any other applicable authority; and
- (8) Grant any other further relief this Court deems just and proper.

Dated: October 14, 2025

Respectfully Submitted,

**/S/ Luis Angeles**

**Luis Angeles, Esq.** Bar N. 25-384  
Angeles Law LLC  
2112 Broadway St NE STE 225 #53  
Minneapolis, MN 55413  
T: (321) 334-0568  
**Luis@abogadoangeles.com**  
Attorney for Petitioner