UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF KENTUCKY
LOUISEVILLE DIVISION

A-M-V-V-,

Plaintiff-Petitioner,

v.

Jason WOOSLEY, Grayson County Jailer;

Russell HOTT, Chicago Field Office Director for U.S. Immigration and Customs Enforcement;

Kristi NOEM, in her official capacity as Secretary, U.S. Department of Homeland Security,

Defendants-Respondents.

Case No. 4:25CV-118-BJB

PETITION FOR A WRIT OF HABEAS CORPUS

INTRODUCTOIN

1. Petitioner, A.M.V.V., is a 42-year-old mother and citizen of El Salvador, who has lived in the United States for eight years since fleeing [redacted] She came to the United States in 2017 with her eldest son K.V., now twenty-one years old, and was later joined in 2018 by her husband, E.V., and her youngest son, S.V., who is now seventeen years old. The family lived together in Chicago, Illinois until A.M.V.V. was detained at a routine check-in with Immigration and Customs Enforcement ("ICE") on March 17, 2025. She remains in ICE custody and is currently detained at Grayson County Detention Center in the Western District of Kentucky.
2. A.M.V.V. previously entered the United States in 2015, but was detained at the border, unrepresented in removal proceedings, and promptly deported to El Salvador a few months later. When she returned to the United States in 2017, she was again apprehended at the border,

but was released on an Order of Supervision ("OSUP") after an asylum officer conducted a Reasonable Fear Interview ("RFI") and determined that she had a reasonable fear of removal to El Salvador.

3. Prior to her re-detention by Respondents ("Respondents") on March 17, 2025, A.M.V.V. attended regular check-ins with ICE to comply with her OSUP requirements. For nearly eight years, since she was released on an OSUP in 2017, A.M.V.V. has complied with all requirements of release. As a result of her compliance with her OSUP, she was eligible for and obtained work authorization.

4. On the date of her re-detention, she appeared, as instructed, for a check-in with ICE at the Chicago ICE Field Office for the purpose of updating her OSUP paperwork to renew her work permit. Instead, without notice to her or to her attorney, A.M.V.V. was summarily re-detained even though her removal was not imminent and there had been no change in circumstances to demonstrate she is either a flight risk or danger to the community.

5. At the time of her detention, the Executive Office of Immigration Review ("EOIR") had not even docketed her case. When a noncitizen, like A.M.V.V. passes a reasonable fear interview, her case should be referred by ICE to EOIR for withholding-only proceedings to allow for a full hearing on her claim that she will be persecuted or tortured if she returns to El Salvador. 8 C.F.R. § 1208.31(e). A.M.V.V.'s case was not docketed until May 22, 2025, — nearly 8 years after her release on an OSUP and two months after her re-detention by ICE. Her first hearing before an Immigration Court occurred on June 5, 2025 – nearly three months after her detention by ICE.

6. The Cleveland Immigration Court has now scheduled an individual merits hearing on her application for withholding of removal and protection under the Convention Against Torture

for November 21, 2025. Accordingly, because her proceedings remain ongoing, her removal is not imminent.

7. The power of the government to detain and deport immigrants is not without limitations. To the contrary, the power of the government to act is delineated by a specific set of statutes and federal regulations, and subject to the limitations of the United States Constitution.

8. To the extent that ICE revoked A.M.V.V.'s OSUP without prior notice or opportunity to be heard, it was in violation of statute, regulations, and the U.S. Constitution. At the time of her unnoticed detention by ICE, Petitioner was in full and complete compliance with her OSUP and ICE did not and could not allege any change in circumstances altering the original assessment of her lack of danger to the community and risk of flight.

9. To comport with due process, immigration detention must bear a reasonable relationship to its two regulatory purposes: ensuring the appearance of noncitizens at future hearings and preventing danger to the community pending the completion of removal. *See Zadvydas v. Davis*, 533 U.S. 690, 691 (2001).

10. Here, despite no changed circumstances regarding either flight risk or public safety, ICE nevertheless detained Petitioner without notice or a hearing, and without meaningfully permitting her counsel an opportunity to respond. *See K.E.O. v. Woosley,* 2025 WL 2553394, at *3 (W.D. Ky. Sept. 4, 2025) (holding that ICE violated its own regulations and petitioner's due process rights by failing to give notice of the reasons for revocation and a prompt interview to respond); *Zhu v. Genalo*, No. 1:25-cv-6523-JLR, 2025 WL 2452352 (S.D.N.Y. Aug. 26, 2025); *Rombot v. Souza*, 296 F. Supp. 3d 383, 388-89 (D. Mass. 2017) (finding a due process violation and explaining that ICE "never asserted that Rombot is a danger to the community or a flight risk, or that he violated the conditions of his [OSUP]. . . . The Supreme Court has

recognized that a 'alien may no doubt be returned to custody upon a violation of [supervision] conditions,' but it has never given ICE a carte blanche to re-incarcerate someone without basic due process protection.") (quoting *Zadvydas*, 533 U.S. at 700).

11. Each day that A.M.V.V. remains in detention, she suffers irreparable harm. "[I]rreparable harm is presumed where there is an alleged deprivation of constitutional rights." *Am. Civil Liberties Union v. Clapper*, 804 F.3d 617, 622 (2d Cir. 2015) (citing *Statharos v. New York City Taxi & Limousine Comm'n*, 198 F.3d 317, 322 (2d Cir. 1999)). In addition to the constitutional harm she has suffered and continues to suffer, she is physically separated from her husband and children.

12. For these reasons, A.M.V.V. is entitled to a writ of habeas corpus under § 2241 and release from custody. In the alternative, she respectfully requests that this Court order Respondents to show cause why this Petition should not be granted within three days. 28 U.S.C. § 2243.

PARTIES

13. A.M.V.V. is a 42-year-old mother, who fled El Salvador in 2017 and has lived in Chicago, Illinois for the last seven years. She is currently detained at Grayson County Jail in Leitchfield, Kentucky.

14. Respondent Russell Hott is named in his official capacity as the Chicago Field Officer Director for U.S. Immigration and Customs Enforcement within the United States Department of Homeland Security ("DHS"). In this capacity, he is responsible for the administration of immigration laws and the execution of detention and removal determinations and is an immediate custodian of Petitioner.

15. Jason Woosley is the Grayson County Jailer, where A.M.V.V. is currently detained. He is named in his official capacity. He is an immediate custodian of the Petitioner.

16. Respondent, Kristi Noem, is named in her official capacity as the Secretary of the U.S. Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

JURISDICTION AND VENUE

17. This Court has federal question jurisdiction over this matter pursuant to 28 U.S.C. § 1331 because it involves the interpretation and application of the U.S. Constitution. U.S. Const. art. I § 9, cl. 2 ("The privilege of the Writ of Habeas Corpus shall not be suspended, unless when in Cases of Rebellion or Invasion the public Safety may require."). This Court also has federal question jurisdiction because this case involves the interpretation and application of 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1651 (All Writs Act), the Immigration and Nationality Act ("INA") and regulations thereunder; the Fifth Amendment of the U.S. Constitution; and the Administrative Procedure Act ("APA"), 5 U.S.C § 701.

18. Petitioner's current arrest and detention constitute a "severe restraint" on her individual liberty such that Petitioner is "in custody" of the Respondents in violation of the laws of the United States. *Hensley v. Municipal Court*, 411 U.S. 345, 351 (1973); 28 U.S.C. § 2241.

19. Venue is proper in the U.S. District Court for the Western District of Kentucky because A.M.V.V. is currently being held within this District. *See* 28 U.S.C. § 1391(e).

RELEVANT STATEMENT OF FACTS AND PROCEDURAL HISTORY

20. A.M.V.V. was born on [redacted], in El Salvador. As a child, growing up in a rural area, she suffered [redacted] over the course of many years. Once she turned 18, she moved to San Salvador to get away from her abusers. In San Salvador

she met her husband, E.V. and they had two sons, K.V., born in 2004, and S.V. born in 2008.

[redacted]

21. A.M.V.V. entered the United States for the first time on or about September 13, 2025. She was detained at the border. On November 24, 2025, after appearing *pro se* in detained removal proceedings, A.M.V.V. was ordered removed by the Dallas Immigration Court. She returned to El Salvador as a deportee and faced further persecution from local gang members from the moment she landed in El Salvador. She was forced to live in hiding for two months until her husband could [redacted] A.M.V.V. and K.V. left El Salvador shortly thereafter.

a. A.M.V.V. returns to the U.S. in 2017 and passes a reasonable fear interview.

22. On or about September 11, 2017, A.M.V.V. and K.V. entered the United States and were detained at the South Texas Family Residential Center in Dilley, Texas.

23. On September 21, 2017, the Department of Homeland Security conducted a Reasonable Fear Interview with A.M.V.V. and determined that she had a reasonable fear of return to El Salvador. On September 28, 2017, DHS served the Respondent with Form I-863, Notice of Referral to Immigration Judge. The Notice was not filed with any immigration court for eight years. On May 22, 2025, two months after A.M.V.V.'s re-detention, the Form I-863 was filed with the Cleveland Immigration Court.

b. ICE places A.M.V.V. on an Order of Supervision

24. After the determination by the asylum officer that A.M.V.V. had a reasonable fear of return to El Salvador, ICE determined she should be permitted to reside in the United States under ICE supervision. In making this determination, ICE necessarily concluded that A.M.V.V. was neither a flight risk nor a danger to the community. ICE placed A.M.V.V. on an OSUP, ordering she "be placed under supervision and permitted to be at large." *See* Exhibit A (OSUP).

25. A.M.V.V. dutifully obeyed all ICE orders and conditions on her release and periodically had "check-ins" with ICE. Initially, A.M.V.V. was also required to enroll in the Intensive Supervision Appearance Program ("ISAP"), managed by BI Inc, an ICE contractor. After approximately three years of compliance, A.M.V.V. was told that she no longer had to report to ISAP.

26. Because A.M.V.V. was released on an OSUP, she was eligible to apply for and received employment authorization in the United States. Every year, A.M.V.V. had to renew her employment authorization. To do so, each year, she had to obtain a letter from ICE affirming her compliance with her Order of Supervision. She had no difficulty doing so until 2025.

27. On October 28, 2024, A.M.V.V. filed an application to renew her work permit with USCIS. A.M.V.V. was represented at the time by attorney Cynthia Mazariegos. In December 2024, she received a Request for Information from USCIS. As is common practice, USCIS requested proof of A.M.V.V.'s compliance with her OSUP.

28. Attorney Mazariegos emailed ICE to request a letter confirming her compliance. Exhibit B (Email Correspondence with ICE). ICE replied that A.M.V.V would have to come into the office to obtain the necessary document. *Id* She was not given a specific date to report and she believed it would be a routine check-in to obtain the necessary letter.

c. **ICE detained A.M.V.V. without notice at the ICE "check-in"**

29. On March 17, 2025, A.M.V.V. reported to the local ICE office for her check-in. She expected to be given a letter confirming her compliance with her OSUP. Instead, she was detained and transported to an ICE facility. A.M.V.V. was represented at the time by attorney Mazariegos, who was not present with her at the check-in. Neither she nor her counsel were provided a meaningful opportunity to contest the revocation of her release.

30. A.M.V.V. was told by an ICE officer that she had an order of removal and she was erroneously informed that she did not have the right to see a judge. In fact, because she had passed a Reasonable Fear Interview in 2017, she did have the right to a hearing before an immigration judge on her claims to withholding of removal and relief under the Convention Against Torture. 8 C.F.R. § 1208.31(e). She was asked to sign a paper that purportedly gave full custody of her minor son, S.V., to her husband. She refused to sign the paper because it was in English and she did not understand it. She was shown no other documents.

31. A.M.V.V. was permitted to call her husband, who alerted A.M.V.V.'s attorney, but A.M.V.V. was not provided an opportunity to consult with her attorney prior to her re-detention.

32. On information and belief, A.M.V.V.'s supervision was terminated by ICE. However, she was given no copies of any document providing notice of, or justification for, the termination of her supervised release pursuant to her OSUP. Nor was she or counsel provided with any documentation, including an administrative warrant or detainer, as a basis for her removal from supervision and detention.

33. Authority to revoke an order of supervision on the basis of potential removal is governed by 8 C.F.R. § 241.4(l)(2), which confers that authority on the Executive Associate Commissioner

and, where "circumstances do not reasonably permit referral [to him]," on the "district director" if she or he finds that revocation "is in the public interest."

34. On information and belief, ICE did not comply with those requirements. A.M.V.V. is aware that ICE has taken the position that authority to revoke supervision has been broadly delegated, such that it need not comply with the regulation as written. It cites a July 25, 2019, order issued by the Executive Associate Director of Enforcement and Removal Operations. That document reads in pertinent part:

> I hereby re-delegate to ERO Assistant Field Office Directors (AFODs), Supervisory Detention and Deportation Officers (SDDOs), Detention and Deportation Officers serving as Field Program Managers, and officers acting in that capacity, the following authorities: ****
>
> - Authority under INA § 241 [8 U.S.C. § 1231] and 8 C.F.R. Part 241, relating to warrants of removal, reinstatement of removal, self-removal, and release of aliens from detention.

This document is insufficient to delegate authority to revoke supervision orders. *See Ceesay v. Kurzdorfer*, 2025 WL 1284720, at *17 (W.D.N.Y. May 2, 2025). The *Ceesay* Court found that the ICE officer lacked "authority to revoke release," and thus that the supervision order "was not lawfully revoked". *Id.* As such, it ordered the Petitioner's release. *Id.*

35. An immigration judge determined that A.M.V.V. has a reasonable fear of return to Mexico and ordered she be placed in withholding-only proceedings to allow for a full hearing on her claim that she will be persecuted or tortured if she returns to Mexico. Her withholding-only proceedings remain ongoing. Accordingly, her removal is not imminent.

LEGAL FRAMEWORK

36. Respondents' purported basis for detaining A.M.V.V. is 8 U.S.C. § 1231. ICE's authority to release people from detention is governed by 8 U.S.C. § 1231(a)(3), which grants ICE authority to release an individual "subject to supervision." Federal regulations specify that ICE may only

release individuals and place them on an OSUP if they "demonstrate[] to the satisfaction of the Attorney General . . . that his or her release will not pose a danger to the community or to the safety of other persons or to property or a significant risk of flight pending such alien's removal." 8 C.F.R. § 241.4(d)(1); *see also id.* § 241.4(e)(6). These requirements—flight risk and danger—reflect constitutional constraints, since only individuals who pose a flight risk or danger may be civilly detained. *See Zadvydas v. Davis*, 533 U.S. 690 (2001).

37. ICE determined that A.M.V.V. was neither a flight risk nor a danger when they placed her on an OSUP after she demonstrated a reasonable fear of persecution if removed to El Salvador. Since being placed on an OSUP nearly eight years ago, A.M.V.V.'s circumstances have not changed, and she has remained in full and complete compliance with all conditions imposed upon her.

38. The INA specifies circumstances upon which a person may be released from custody, but it does not provide for re-detention except impliedly for a violation of those terms.

39. The regulatory framework (8 C.F.R. § 241.4(l), as pertinent here) authorizes revocation of an individual's release on an OSUP only in certain contexts. First, § 241.4(l)(1) permits revocation if the noncitizen has violated the conditions of release. That is not alleged to have occurred and indeed has not occurred here. A.M.V.V. was in full compliance with the conditions of her release when she was detained.

40. Second, revocation is permitted where one of four conditions is met: "(1) the purposes of release have been served; (2) the alien violates any condition of release; (3) it is appropriate to enforce a removal order or to commence removal proceedings against an alien; or (4) the conduct of the alien, or any other circumstance, indicates that release would no longer be appropriate." 8 C.F.R. § 241.4(l)(2).

41. Revocations under § 241.4(l)(2) may be ordered by either the Executive Associate Commissioner or the "District Director." Revocation may be ordered by the District Director only upon a finding that revocation is in the public interest. *Id.*; *see also Matter of Sugay*, 17 I&N Dec. 637, *3 (BIA 1981) ("no change should be made by a District Director absent a change of circumstance."); *Panosyan v. Mayorkas*, 854 Fed. Appx. 787, 788 (9th Cir. July 29, 2021) ("absent changed circumstances, such as 'reinvolvement with the criminal justice system, ICE cannot redetain Panosyan.") (internal citations omitted); *Jorge M.F. v. Wilkinson*, 2021 WL 783561, *2 (N.D. Cal. March 1, 2021) ("[i]n practice, the DHS re-arrests individuals only after a 'material' change in circumstances," and "the government's discretion to incarcerate non-citizens is always constrained by the requirements of due process.") (citations omitted).

42. Upon revocation of an order of supervision, ICE must give a noncitizen notice of the reasons for revocation and a prompt interview to respond. 8 C.F.R. § 241.4(l); *see also K.E.O. v. Woosley*, 2025 WL 2553394, at *3 (W.D. Ky. Sept. 4, 2025); *Zhu v. Genalo*, No. 1:25-cv-6523-JLR, 2025 WL 2452352 (S.D.N.Y. Aug. 26, 2025).

43. A.M.V.V. has, at minimum, a regulatory right to an explanation for the reasons of revocation as well as an interview to contest the basis for the revocation. At a minimum, ICE "has the duty to follow its own federal regulations." *Haoud v. Ashcroft*, 350 F.3d 201, 205 (1st Cir. 2003) (quoting *Nelson v. I.N.S.*, 232 F.3d 258, 262 (1st Cir. 2000)); *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 266, 268 (1954). It has failed to do so here.

44. When the government fails to comply with its own regulations, as it did when it revoked A.M.V.V.'s release in violation of its own procedures, the action should be found invalid. *See K.E.O.*, 2025 WL 2553394, at *3; *Rombot*, 296 F. Supp. 3d at 388; *Ceesay*, 781 F. Supp. 3d at

166.

45. The decision to detain A.M.V.V. may be reviewed by this Court and may be vacated if found to be "arbitrary, capricious, an abuse of discretion and not in accordance with the law." 5 U.S.C. §§ 706(2)(A), (E). Absent this Court's intervention, A.M.V.V. does not have any "remedy" to challenge the decision of Respondents. *See Torres-Jurado v. Biden,* 2023 WL 7130898, *4 (S.D.N.Y. Oct. 29, 2023) (finding that "[a]lthough procedural requirements can seem like a mere formality, they promote 'agency accountability' and ensure that the parties—and where relevant, the public—can respond fully and in a timely manner to an agency's exercise of authority.") (citing *Dept. of Homeland Sec. v. Bd. of Regents of Univ. of Calif.,* 591 U.S. 1, 22-23 (2020)).

46. To comport with due process, detention must bear a reasonable relationship to its two regulatory purposes—to ensure the appearance of noncitizens at future hearings and to prevent danger to the community pending the completion of removal. *Zadvydas*, 533 U.S. at 690-691.

47. Procedural due process constrains governmental decisions that deprive individuals of property or liberty interests within the meaning of the Due Process Clause of the Fifth Amendment. Because A.M.V.V.'s detention on March 17, 2025, lacked the procedural protections that such a significant deprivation of liberty requires under the Due Process Clause of the Fifth Amendment to the U.S. Constitution, her continued detention is unlawful. *See Mathews v. Eldridge,* 424 U.S. 319, 332 (1976); *see also Perry v. Sindermann*, 408 U.S. 593, 601-03 (1972) (reliance on informal policies and practices may establish a legitimate claim of entitlement to a constitutionally protected interest). Infringing upon a protected interest triggers a right to a hearing before that right is deprived. *See Bd. of Regents of State Colleges v. Roth*, 408 U.S. 564, 569-70 (1972).

48. The revocation of A.M.V.V.'s release does not satisfy the minimum requirements of due process, because that revocation is not the product of any individualized review and alleges no relevant change in circumstances altering the original assessment of her risk of flight. *See Rombot,* 296 F. Supp. 3d at 388; *see also Torres-Jurado,* 2023 WL 7130898, *4 at *12 (S.D.N.Y. Oct. 29, 2023) (stating that "[d]ue process, at minimum" requires the government to afford meaningful notice and an opportunity to be heard) (citing *Ying Fong v. Ashcroft*, 317 F. Supp. 2d 398, 403 (S.D.N.Y. 2004)).

CLAIMS FOR RELIEF

COUNT I (VIOLATION OF THE APA)

A.M.V.V.'s Order of Supervision Has Not Been Validly Rescinded

49. Petitioner realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

50. Under the terms of the INA, the governing regulations, and the APA, Petitioner's release order has not been validly rescinded or terminated.

51. First, on information and belief (due to Respondents' failure to provide any documents to Petitioner), any local ICE agent who purported to revoke her supervision lacked authority to do so. Those agents have not been given express delegated authority to act by the Executive Associate Commissioner. Nothing in the July 25, 2019, delegation notice, *see supra* para 34, grants authority over supervision revocation to local ICE agents.

52. Second, even assuming arguendo that local ICE officers were authorized to revoke supervision, they were obliged to revoke it only on a finding that it satisfied the public interest based on materially changed circumstances. No one made any such finding.

53. A.M.V.V.'s re-detention is therefore contrary to law, arbitrary and capricious, and an abuse of

discretion in violation of the APA and the Fifth Amendment.

COUNT II (VIOLATION OF THE FIFTH AMENDMENT)

A.M.V.V.'s Detention Violates the Fifth Amendment's Due Process Clause Because it Bears No Reasonable Relationship to Any Legitimate Purpose

54. Petitioner realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

55. To comport with due process, detention must bear a reasonable relationship to its two regulatory purposes—to ensure the appearance of noncitizens at future hearings and to prevent danger to the community pending the completion of removal. *Zadvydas*, 533 U.S. at 690-691.

56. Petitioner is neither a danger nor a flight risk. The detention of Petitioner is arbitrary on its face.

57. Petitioner has dutifully complied with every condition of her release, and no change in circumstances exists to warrant the revocation of her OSUP.

58. Because Petitioner's detention has been unaccompanied by the procedural protections that such a significant deprivation of liberty requires under the Due Process Clause of the Fifth Amendment to the U.S. Constitution, her continued detention is unlawful.

COUNT III (VIOLATION OF THE APA)

A.M.V.V.'s Detention Violates the APA and the *Accardi* Doctrine

59. Petitioner realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

60. When the government has promulgated "[r]egulations with the force and effect of law," those regulations "supplement the bare bones" of federal statutes, such that the agencies are bound to follow their own "existing valid regulations." *Accardi*, 347 U.S. at 266, 268. The *Accardi* doctrine also obligates agencies to comply with procedures it outlines in its internal manuals.

See Morton v. Ruiz, 415 U.S. 199, 235 (1974) (finding that an agency is obligated to comply with procedural rules outlined in its internal manual).

61. To the extent that Respondents have revoked A.M.V.V.'s OSUP without notice or an opportunity to be heard, they violated the statute and the applicable regulations–8 C.F.R. §§ 241.4(l) and 241.13(i)–by failing to provide her with a particularized notice of the reason(s) of the revocation of her release and an opportunity to respond to the allegations contained therein.

62. Her detention is therefore unlawful, arbitrary and capricious, and an abuse of discretion in violation of the APA and the *Accardi* doctrine.

PRAYER FOR RELIEF

WHEREFORE, Petitioner requests that this Court:

a. Exercise jurisdiction over this matter;

b. Issue a writ of habeas corpus requiring that Respondents immediately release Petitioner or, in the alternative, order Respondents to show cause why this Petition should not be granted within three days pursuant to 28 U.S.C. § 2243.

c. Enjoin Respondents from moving Petitioner outside the jurisdiction of this Court pending adjudication of this petition;

d. Declare that A.M.V.V.'s detention violates the INA, the APA, pertinent regulations and the Due Process Clause of the Fifth Amendment; and

e. Order such other relief as this Court may deem just and proper.

Dated: October 16, 2025

Respectfully submitted,

s/ Colleen Cowgill
Colleen Cowgill*
NATIONAL IMMIGRANT JUSTICE CENTER

111 W. Jackson St., Suite 800
Chicago, IL 60604
(312) 235-4774
CCowgill@immigrantjustice.org

Pro hac vice admission pending

CERTIFICATE OF SERVICE

I, Colleen Cowgill, hereby certify that on October 16, 2025, I filed the foregoing with the Clerk of Court using the CM/ECF system, which sent notice of filing to all parties receiving electronic notice.

s/ Colleen Cowgill
Attorney for Petitioner