

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

Rubelio Gilberto RAMIREZ ROJAS,

Petitioner,

v.

Case No.

1. Kristi NOEM, Secretary, U.S.  
Department of Homeland  
Security; U.S. DEPARTMENT OF  
HOMELAND SECURITY;
2. Pamela BONDI, U.S. Attorney  
General; EXECUTIVE OFFICE  
FOR IMMIGRATION REVIEW;
3. Joshua JOHNSON, Field Office  
Director of Enforcement and  
Removal Operations, ICE Dallas  
Field Office, Immigration and  
Customs Enforcement;
4. Scarlett GRANT, Warden of  
Cimarron Correctional Facility,

Respondents.

**PETITION FOR WRIT OF HABEAS CORPUS  
PURSUANT TO 28 U.S.C. § 2241**

## PRELIMINARY STATEMENT

1. This case challenges the unlawful and indefinite detention of a longtime Oklahoma resident under a new and erroneous interpretation of the Immigration and Nationality Act (“INA”). Petitioner Rubelio Gilberto Ramirez Rojas—a husband, father of three U.S. citizen children, and resident of Oklahoma City for nearly two decades—has been held without the possibility of bond solely because the Department of Homeland Security (“DHS”) and the Executive Office for Immigration Review (“EOIR”) have chosen to treat him as if he were an “arriving” alien caught at the border, rather than a community member apprehended inside the United States. ICE’s misapplication of 8 U.S.C. § 1225(b)(2)(A) and the Board of Immigration Appeals’ recent decision in *Matter of Yajure Hurtado*, have stripped Petitioner—and thousands of similarly situated individuals—of the bond hearings guaranteed by § 1226(a).

2. Here, the consequences of that misinterpretation are compounded by bureaucratic error: ICE repeatedly provided the wrong detention location to the immigration courts, bouncing Petitioner’s bond request between jurisdictions and denying him any meaningful review of his confinement. As a result, he remains detained at the Cimarron Correctional Facility in Cushing, Oklahoma, without judicial oversight, in violation of both the INA and the Due Process Clause of the Fifth Amendment.

## INTRODUCTION

3. Petitioner Rubelio Gilberto Ramirez Rojas is in the physical custody of Respondents at the Cimarron Correctional Facility in Cushing, Oklahoma. He now faces unlawful detention because the DHS and the EOIR have concluded Petitioner is subject to mandatory detention.

4. Petitioner is charged with, inter alia, having entered the United States without admission or inspection. *See* 8 U.S.C. § 1182(a)(6)(A)(i).

5. Based on this allegation in Petitioner's removal proceedings, DHS denied Petitioner release from immigration custody, consistent with a new DHS policy issued on July 8, 2025, instructing all Immigration and Customs Enforcement (ICE) employees to consider anyone inadmissible under § 1182(a)(6)(A)(i)—i.e., those who entered the United States without admission or inspection—to be subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

6. Similarly, on September 5, 2025, the Board of Immigration Appeals (BIA or Board) issued a precedent decision, binding on all immigration judges, holding that an immigration judge has no authority to consider bond requests for any person who entered the United States without admission. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). The Board determined that such individuals are subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

7. Petitioner's detention on this basis violates the plain language of the Immigration and Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner who previously entered and are now residing in the United States. Instead, such individuals are subject to a different statute, § 1226(a), that allows for release on conditional parole or bond. That statute expressly applies to people who, like Petitioner, are charged as inadmissible for having entered the United States without inspection.

8. Respondents' new legal interpretation is plainly contrary to the statutory framework and contrary to decades of agency practice applying § 1226(a) to people like Petitioner.

9. Accordingly, Petitioner seeks a writ of habeas corpus requiring that he be released unless Respondents provide a bond hearing under § 1226(a) within seven days.

### **JURISDICTION**

10. Petitioner is in the physical custody of Respondents. Petitioner is detained at the Cimarron Correctional Facility in Cushing, Oklahoma.

11. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause).

12. This 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.

### **VENUE**

13. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493- 500 (1973), venue lies in the United States District Court for the Western District of Oklahoma, the judicial district in which Petitioner currently is detained.

14. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the United States District Court for Western District of Oklahoma.

### **REQUIREMENTS OF 28 U.S.C. § 2243**

15. The Court must grant the petition for writ of habeas corpus or order Respondents to show cause “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, Respondents must file a return “within three days unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.*

16. Habeas corpus is “perhaps the most important writ known to the constitutional law . . . affording as it does a *swift* and imperative remedy in

all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

### **PARTIES**

17. Petitioner, Rubelio Gilberto Ramirez Rojas is alleged to be a citizen of Guatemala who has been in immigration detention since September 4, 2025. After arresting Petitioner in Oklahoma City, Oklahoma, ICE did not set bond and Petitioner is unable to obtain review of his custody by an immigration judge, pursuant to the Board’s decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

18. Respondent Kristi Noem is the Secretary of the 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.

19. Respondent Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

20. Respondent Pamela Bondi is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review and the immigration court system it operates is a component agency. She is sued in her official capacity.

21. 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.

22. Respondent Joshua Johnson is the Acting Field Office Director of the Dallas Field Office of ICE's Enforcement and Removal Operations division. As such, Acting Field Office Director Joshua Johnson is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He is named in his official capacity.

23. Respondent Scarlet Grant is employed by Core Civic as Warden of the Cimarron Correctional Facility, where Petitioner is detained. She has immediate physical custody of Petitioner. She is sued in her official capacity.

### **LEGAL FRAMEWORK**

24. The INA prescribes three basic forms of detention for the vast majority of noncitizens in removal proceedings.

25. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals

in § 1226(a) detention are generally 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).

26. 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 § 1225(b)(2).

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

28. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

29. The detention provisions at § 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(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No. 119–1, 139 Stat. 3 (2025).

30. Following the enactment of the IIRIRA, EOIR drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225 and that they

were instead detained under § 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).

31. Thus, in the decades that followed, most people who entered without inspection and were placed in standard removal proceedings received bond hearings, unless their criminal history rendered them ineligible pursuant to 8 U.S.C. § 1226(c). That practice was consistent with many more decades of prior practice, 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 § 1226(a) simply “restates” the detention authority previously found at § 1252(a)).

32. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new policy that rejected well-established understanding of the statutory framework and reversed decades of practice.

33. The new policy, entitled “Interim Guidance Regarding Detention Authority for Applicants for Admission,”<sup>1</sup> claims that all persons who entered the United States without inspection shall now be subject to mandatory detention provision under § 1225(b)(2)(A). The policy applies regardless of

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<sup>1</sup> Available at <https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applicants-for-admission>.

when a person is apprehended, and affects those who have resided in the United States for months, years, and even decades.

34. On September 5, 2025, the BIA adopted this same position in a published decision, *Matter of Yajure Hurtado*. There, the Board held that all noncitizens who entered the United States without admission or parole are subject to detention under § 1225(b)(2)(A) and are ineligible for IJ bond hearings.

35. Since Respondents adopted their new policies, dozens of federal courts have rejected their new interpretation of the INA's detention authorities. Courts have likewise rejected *Matter of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

36. Even before ICE or the BIA introduced these nationwide policies, IJs in the Tacoma, Washington, immigration court stopped providing bond hearings for persons who entered the United States without inspection and who have since resided here. There, the U.S. District Court in the Western District of Washington found that such a reading of the INA is likely unlawful and that § 1226(a), not § 1225(b), applies to noncitizens who are not apprehended upon arrival to the United States. *Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025).

37. Subsequently, court after court has adopted the same reading of the INA's detention authorities and rejected ICE and EOIR's new

interpretation, including our sister courts in the Tenth Circuit. *See, Garcia Cortes v. Noem*, No. 1:25-cv-02677, 2025 WL 2652880 (D. Colo. Sept. 16, 2025); *Salazar v. Dedos*, No. 1:25-cv-00835, 2025 WL 2676729 (D.N.M. Sept. 17, 2025); and *Gamez Lira v. Noem*, No. 1:25-cv-00855 (D.N.M. Sept. 24, 2025). Other District Courts across the country have also rejected ICE's erroneous interpretation. *See, e.g., Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*, No. CV 25-11613-BEM, --- F. Supp. 3d ----, 2025 WL 2084238 (D. Mass. July 24, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), *report and recommendation adopted*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263 (N.D. Cal. Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No.

25-CV-3051 (ECT/DJF), --- F. Supp. 3d ----, 2025 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v. Raycraft*, No. 2:25-cv-12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass. Sept. 9, 2025); *see also, e.g., Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566, at \*2 (D. Neb. Sept. 3, 2025) (noting that “[t]he Court tends to agree” that § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL 2402271 at \*3 (D. Neb. Aug. 19, 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224 at \*2 (D. Neb. Aug. 14, 2025) (same).

38. Courts have uniformly rejected DHS’s and EOIR’s new interpretation because it defies the INA. As the *Rodriguez Vazquez* court and others have explained, the plain text of the statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people like Petitioner.

39. Section 1226(a) applies by default to all persons “pending a decision on whether the [noncitizen] is to be removed from the United

States.” These removal hearings are held under § 1229a, to “decid[e] the inadmissibility or deportability of a[] [noncitizen].”

40. The text of § 1226 also explicitly applies to people charged as being inadmissible, including those who entered without inspection. *See* 8 U.S.C. § 1226(c)(1)(E). Subparagraph (E)’s reference to such people makes clear that, by default, such people are afforded a bond hearing under subsection (a). As the *Rodriguez Vazquez* court explained, “[w]hen Congress creates ‘specific exceptions’ to a statute’s applicability, it ‘proves’ that absent those exceptions, the statute generally applies.” *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 (citing *Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)); *see also Gomes*, 2025 WL 1869299, at \*7.

41. Section 1226 therefore leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole.

42. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently entered the United States. The statute’s entire framework is premised on inspections at the border of people who are “seeking admission” to the United States. 8 U.S.C. § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention scheme applies “at the Nation’s borders and ports of entry, where the Government

must determine whether a [noncitizen] seeking to enter the country is admissible.” *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018).

43. Accordingly, the mandatory detention provision of § 1225(b)(2)(A) does not apply to people like Petitioner, who have already entered and were residing in the United States at the time they were apprehended.

### **FACTS**

44. Petitioner has resided continuously in the United States since March 2006 and currently lives in Oklahoma City, Oklahoma.

45. On September 4, 2025, Petitioner was arrested by ICE agents in Oklahoma City, Oklahoma following a vehicle stop initiated by ICE officers near N. May Avenue and Hefner Road. The stop was not conducted in coordination with, nor initiated by, local law enforcement or the Oklahoma Highway Patrol. Petitioner was merely a passenger in the vehicle and presented a valid State of New Mexico Driver’s License upon request. Despite this, ICE agents determined that Petitioner is a native and citizen of Guatemala who is present in the United States without lawful immigration status. Petitioner was subsequently taken into ICE custody and is presently detained at the Cimarron Correctional Facility in Cushing, Oklahoma.

46. DHS initially placed Petitioner in removal proceedings before the El Paso, Texas Immigration Court pursuant to 8 U.S.C. § 1229a. ICE has charged Petitioner with, *inter alia*, being inadmissible under 8 U.S.C. §

1182(a)(6)(A)(i) as someone who entered the United States without inspection.

47. Petitioner has resided in Oklahoma City, Oklahoma for more than ten (10) years. He is married and the father of three (3) United States citizen children, ages ten (10), six (6), and one (1). Petitioner has no criminal history and serves as the primary financial provider for his family. He has consistently complied with his civic obligations, including the regular filing of his income tax returns. Petitioner is an active and devoted member of his Catholic parish in Oklahoma City and maintains strong community ties. His eldest U.S. citizen daughter suffers from chronic asthma, for which she requires ongoing care and parental support. Petitioner poses neither a flight risk nor a danger to the community.

48. Following Petitioner's arrest and transfer to Cimarron Correctional Facility, ICE issued a custody determination continuing his detention without affording him an opportunity to post bond or to be released under any conditions.

49. On September 18, 2025, Petitioner, through counsel, requested a bond redetermination hearing before an Immigration Judge using the EOIR Online Portal.

50. At that time, the EOIR Portal reflected jurisdiction with the El Paso Immigration Court, and a bond hearing was accordingly scheduled there for September 23, 2025.

51. On September 23, 2025, however, the El Paso Immigration Court was unable to take any action on the bond request because ICE had incorrectly reported Petitioner's detention location as the Bluebonnet Detention Center in Texas. In fact, Petitioner has never been housed at Bluebonnet. As a result of ICE's error, Immigration Judge Abdias Tida concluded that the El Paso Immigration Court lacked jurisdiction to consider the bond request. This type of misreporting by ICE—repeatedly providing inaccurate detention locations to EOIR—regularly delays access to due process for noncitizens. *See* Decision of Immigration Judge Abdias Tida (El Paso Immigration Court, Sept. 23, 2025), attached hereto as Exhibit 1.

52. The following day, September 24, 2025, Petitioner immediately filed a new "Pre-NTA" bond request with the Aurora Immigration Court, the court of proper jurisdiction over Cushing, Oklahoma. On September 29, 2025, the Aurora Immigration Court rejected the filing after ICE—only days earlier, on September 25, 2025—had apparently submitted an I-830 (Notice to EOIR: Alien Address) changing Petitioner's detention location on record. The rejection notice nevertheless directed Petitioner to re-file the same bond request with the Aurora Court, which he promptly did. The Aurora

Immigration Court then scheduled a hearing for October 6, 2025, before the Honorable Immigration Judge Brea Burgie.

53. At the October 6, 2025 hearing, the Immigration Judge determined that, pursuant to *Matter of Yajure Hurtado*, she lacked jurisdiction to consider Petitioner's bond request. *See* Decision of Immigration Judge Brea Burgie (Aurora Immigration Court, Oct. 6, 2025), attached hereto as Exhibit 2.

54. As a result of this procedural ping-pong between ICE and the Immigration Courts—caused primarily by ICE's repeated misreporting of Petitioner's detention location—Petitioner remains in custody without judicial review of his detention. Without intervention from this Court, he faces the prospect of indefinite detention lasting months or even years, separated from his family and community.

## **CLAIMS FOR RELIEF**

### **COUNT I**

#### **Violation of the INA**

55. Petitioner incorporates by reference the allegations of fact set forth in the preceding paragraphs.

56. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those

who previously entered the country and have been residing in the United States prior to being apprehended and placed in removal proceedings by Respondents. Such noncitizens are detained under § 1226(a), unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.

57. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued detention and violates the INA.

## **COUNT II**

### **Violation of Due Process**

58. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

59. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

60. Petitioner has a fundamental interest in liberty and being free from official restraint.

61. The government’s detention of Petitioner without a bond redetermination hearing to determine whether he is a flight risk or danger to others violates his right to due process.

**PRAYER FOR RELIEF**

WHEREFORE, Petitioner prays that this Court grant the following relief:

- a. Assume jurisdiction over this matter;
- b. Order that Petitioner shall not be transferred outside the Western District of Oklahoma while this habeas petition is pending;
- c. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;
- d. Issue a Writ of Habeas Corpus requiring that Respondents release Petitioner or, in the alternative, provide Petitioner with a bond hearing pursuant to 8 U.S.C. § 1226(a) within seven days;
- e. Declare that Petitioner's detention is unlawful;
- f. Award Petitioner 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
- g. Grant any other and further relief that this Court deems just and proper.

DATED this 17th of October, 2025.

Respectfully submitted,

/s/ Michelle L. Edstrom

Michelle L. Edstrom, OBA #22555

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*Attorney for Petitioner*

**VERIFICATION OF COUNSEL**

I, Michelle L. Edstrom, hereby certify that I am familiar with the case of the named Petitioner and that the facts as stated above are true and correct to the best of my knowledge and belief.

/s/ Michelle L. Edstrom

Michelle L. Edstrom, OBA #22555

**CERTIFICATE OF SERVICE**

This is to certify that on October 17, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a notice of electronic filing to counsel of record. In addition, the document was emailed to the U.S. Attorney's Office to attorneys assigned to the civil division and appellate division.

/s/ Michelle L. Edstrom

Michelle L. Edstrom, OBA #22555