

1
2
3
4
5
6 UNITED STATES DISTRICT COURT
7 MIDDLE DISTRICT OF GEORGIA
8 COLUMBUS DIVISION

9 JORGE ALBERTO CABRALES
10 CABRALES/A [REDACTED]

Case No. 25-337

11 Petitioner,

12 v.

13 LADEON FRANCIS, Field Office
14 Director of Enforcement and Removal
15 Operations, Atlanta Field Office,
16 Immigration and Customs Enforcement;
17 TODD LYONS, Acting Director, U.S.
18 Immigration Customs Enforcement,
19 KRISTI NOEM, Secretary, U.S.
20 Department of Homeland Security; PAM
21 BONDI, U.S. Attorney General;
22 DAREN K. MARGOLIN, Director,
23 Executive Office for Immigration
24 Review (EOIR); JASON STREEVAL,
Warden of STEWART DETENTION
CENTER,

**PETITION FOR WRIT OF
HABEAS CORPUS**

Respondents.

INTRODUCTION

1. Petitioner Mr. Jorge Cabrales Cabrales is in the physical custody of
2 Respondents at the Stewart Detention Center. He now faces unlawful detention
3 because the Department of Homeland Security (DHS) and the Executive Office of
4 Immigration Review (EOIR) have concluded Petitioner is subject to mandatory
5 detention.

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

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

15. Similarly, on September 5, 2025, the Board of Immigration Appeals
16 (BIA or Board) issued a precedent decision, binding on all immigration judges,
17 holding that an immigration judge has no authority to consider bond requests for any
18 person who entered the United States without admission. *See Matter of Yajure*
19 *Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). The Board determined that such
20

individuals are subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

5. 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.

6. 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.

7. 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

8. Petitioner is in the physical custody of Respondents. Petitioner is detained at the Stewart Detention Center in Lumpkin, Georgia

9. 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).

10. 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

11. 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 Middle District of Georgia, the judicial district in which Petitioner currently is detained.

12. 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 Middle District of Georgia.

REQUIREMENTS OF 28 U.S.C. § 2243

13. 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.*

14. 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

15. Petitioner Mr. Jorge Cabrales Cabrales is native and citizen of Mexico who has been in immigration detention since October 2, 2025. After arresting Petitioner, ICE did not set bond and Petitioner is unable to obtain review of his custody by an IJ, pursuant to the Board's decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

16. Respondent Ladeon Francis is the Director of the Atlanta Field Office of ICE's Enforcement and Removal Operations division. As such, George Sterling is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He is named in his official capacity.

1 17. Respondent Kristi Noem is the Secretary of the Department of
2 Homeland Security. She is responsible for the implementation and enforcement of
3 the Immigration and Nationality Act (INA), and oversees ICE, which is responsible
4 for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner
5 and is sued in her official capacity.

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

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

13 20. Respondent, Darlen Margolin, is the Director of the Executive Office
14 for Immigration Review (EOIR). EOIR is the federal agency responsible for
15 implementing and enforcing the INA in removal proceedings, including for custody
16 redeterminations in bond hearings.

17 21. Respondent, Jason Streeval is employed by CoreCivic as Warden of
18 the Stewart Detention Center, where Petitioner is detained. He has immediate
19 physical custody of Petitioner. He is sued in his official capacity.

LEGAL FRAMEWORK

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

23. 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).

24. 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).

25. 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).

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

27. 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

1 to 3009–583, 3009–585. Section 1226(a) was most recently amended earlier this
2 year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025).

3 28. Following the enactment of the IIRIRA, EOIR drafted new regulations
4 explaining that, in general, people who entered the country without inspection were
5 not considered detained under § 1225 and that they were instead detained under §
6 1226(a). *See Inspection and Expedited Removal of Aliens; Detention and Removal*
7 *of Aliens; Conduct of Removal Proceedings; Asylum Procedures*, 62 Fed. Reg.
8 10312, 10323 (Mar. 6, 1997).

9 29. Thus, in the decades that followed, most people who entered without
10 inspection and were placed in standard removal proceedings received bond hearings,
11 unless their criminal history rendered them ineligible pursuant to 8 U.S.C. § 1226(c).
12 That practice was consistent with many more decades of prior practice, in which
13 noncitizens who were not deemed “arriving” were entitled to a custody hearing
14 before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R.
15 Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply “restates” the
16 detention authority previously found at § 1252(a)).
17

18 30. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new
19 policy that rejected well-established understanding of the statutory framework and
20 reversed decades of practice.
21
22

1 31. The new policy, entitled “Interim Guidance Regarding Detention
2 Authority for Applicants for Admission,”¹ claims that all persons who entered the
3 United States without inspection shall now be subject to mandatory detention
4 provision under § 1225(b)(2)(A). The policy applies regardless of when a person is
5 apprehended and affects those who have resided in the United States for months,
6 years, and even decades.

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

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

17 34. Even before ICE or the BIA introduced these nationwide policies, IJs
18 in the Tacoma, Washington, immigration court stopped providing bond hearings for
19 persons who entered the United States without inspection and who have since
20 resided here. There, the U.S. District Court in the Western District of Washington

23

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

1 found that such a reading of the INA is likely unlawful and that § 1226(a), not §
2 1225(b), applies to noncitizens who are not apprehended upon arrival to the United
3 States. *Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025).

4 35. Subsequently, court after court has adopted the same reading of the
5 INA's detention authorities and rejected ICE and EOIR's new interpretation. *See*,
6 *e.g.*, *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7,
7 2025); *Diaz Martinez v. Hyde*, No. CV 25-11613-BEM, --- F. Supp. 3d ----, 2025
8 WL 2084238 (D. Mass. July 24, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX
9 DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), *report and*
10 *recommendation adopted*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133
11 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025
12 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-
13 SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v.*
14 *Noem*, No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15,
15 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19,
16 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug.
17 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263
18 (N.D. Cal. Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025
19 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-
20 KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-
21

1 CV-3051 (ECT/DJF), --- F. Supp. 3d ----, 2025 WL 2466670 (D. Minn. Aug. 27,
2 2025) *Lopez-Campos v. Raycraft*, No. 2:25-cv-12486-BRM-EAS, 2025 WL
3 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez Garcia v. Noem*, No. 25-cv-02180-
4 DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Zaragoza Mosqueda v.*
5 *Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8,
6 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich.
7 Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D.
8 Mass. Sept. 9, 2025); *see also*, e.g., *Palma Perez v. Berg*, No. 8:25CV494, 2025 WL
9 2531566, at *2 (D. Neb. Sept. 3, 2025) (noting that “[t]he Court tends to agree” that
10 § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-
11 cv-03161-JFB-RCC, 2025 WL 2402271 at *3 (D. Neb. Aug. 19, 2025) (same);
12 *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224 at *2 (D. Neb.
13 Aug. 14, 2025) (same).

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

21 37. Section 1226(a) applies by default to all persons “pending a decision
22 on whether the [noncitizen] is to be removed from the United States.” These removal
23
24

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

3 38. The text of § 1226 also explicitly applies to people charged as being
4 inadmissible, including those who entered without inspection. *See* 8 U.S.C. §
5 1226(c)(1)(E). Subparagraph (E)’s reference to such people makes clear that, by
6 default, such people are afforded a bond hearing under subsection (a). As the
7 *Rodriguez Vazquez* court explained, “[w]hen Congress creates ‘specific exceptions’
8 to a statute’s applicability, it ‘proves’ that absent those exceptions, the statute
9 generally applies.” *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 (citing *Shady Grove*
10 *Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)); *see also*
11 *Gomes*, 2025 WL 1869299, at *7.

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

15 40. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry
16 or who recently entered the United States. The statute’s entire framework is
17 premised on inspections at the border of people who are “seeking admission” to the
18 United States. 8 U.S.C. § 1225(b)(2)(A). Indeed, the Supreme Court has explained
19 that this mandatory detention scheme applies “at the Nation’s borders and ports of
20

21
22
23
24

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

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

7 FACTS

8 42. Petitioner, Jorge Cabrales Cabrales, is a native and citizen of Mexico
9 who entered the United States on April 8, 1999, and has lived in this country for
10 more than twenty-five years. He is a father, business owner, and long-standing
11 community member who has built his entire life in the United States.

12 43. On August 26, 2020, Petitioner was placed in removal proceedings
13 under § 240 of the Immigration and Nationality Act (INA) and charged under INA
14 § 212(a)(6)(A)(i) as a noncitizen present in the United States without being admitted
15 or paroled. See Exhibit A, Photocopy of NTA. On April 7, 2022, Petitioner filed an
16 application for Cancellation of Removal under INA § 240A(b), which remains
17 pending before the Immigration Court. At the time of his detention, Petitioner
18 possessed a valid employment authorization document (EAD) and was in full
19 compliance with his immigration obligations.

20 21 22 44. Despite his long-standing residence and pending relief, Petitioner was
23 arrested by ICE on October 5, 2025, while on his way to work, and transferred to the
24

1 Stewart Detention Center in Lumpkin, Georgia. He has remained detained there
2 since that date. See Exhibit B, ICE Form I-830.

3 45. Petitioner has lived a life defined by perseverance and responsibility.

4 He is the single father of nine U.S.-citizen or lawful resident children: A [REDACTED] (16 years
5 old), J [REDACTED] (14), J [REDACTED] (12), G [REDACTED] (10), A [REDACTED] (10), A [REDACTED] (9), C [REDACTED] (5),
6 M [REDACTED] (1), and I [REDACTED] (8 months). Petitioner's older children are all high-achieving
7 students, enrolled in honors and gifted programs, and deeply attached to their father.
8 His youngest son, M [REDACTED] may be on the autism spectrum and requires surgery for a
9 testicular condition. Petitioner provides not only financial support but also the
10 emotional and physical stability essential to their wellbeing.

11 46. Petitioner's eldest daughter, A [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]

15 therapy but continues to experience depression, anxiety, and post-traumatic stress
16 symptoms. Her condition has deteriorated sharply since her father's detention, as she
17 views him as her protector and source of emotional stability. The separation has
18 intensified her fear and anxiety, leaving her emotionally fragile and unable to focus
19 on her education.

20 47. Petitioner himself suffers from cirrhosis of the liver and iron

21 accumulation in his legs, medical conditions that require consistent treatment and
22 monitoring that are not readily available in immigration detention. Despite these
23

1 health challenges, Petitioner has continued to work hard, care for his children, and
2 maintain a successful business.

3 48. In 2018, Petitioner founded Cabrales Construction, a thriving company
4 that employs approximately twenty workers and generates over one million dollars
5 in annual revenue. His business is a significant contributor to the local economy and
6 provides livelihoods to numerous families.

7 49. Petitioner's criminal record consists only of non-violent and dated
8 offenses, including a DUI from 2006, a no-license citation from 2008, a DUI from
9 2013 in Fulton County, and a no-license citation from 2014 in Gwinnett County. In
10 2019, he was charged with marijuana-related offenses in Douglas County; however,
11 all such charges were dismissed. He has paid all fines, complied with every court
12 order, and demonstrated rehabilitation and law-abiding conduct over the last decade.

13 50. These prior offenses do not subject Petitioner to mandatory detention
14 under 8 U.S.C. § 1226(c) because they are neither aggravated felonies nor crimes
15 involving moral turpitude. Petitioner poses no danger to the community and is not a
16 flight risk. He owns his home, employs others, and has lived and worked in the
17 United States for more than two decades while supporting his large U.S.-citizen
18 family.

19 51. Pursuant to *Matter of Yajure Hurtado*, 28 I&N Dec. 377 (BIA 2021),
20 the Immigration Judge is unable to consider Petitioner's bond request due to the
21

1 Department of Homeland Security's classification of his case. As a result, he remains
2 detained without the opportunity for an individualized bond hearing. Without relief
3 from this Court, he faces the prospect of months or even years in immigration
4 custody—separated from his nine children, including his eldest daughter Ave, whose
5 psychological condition continues to deteriorate in his absence.
6

7 52. Accordingly, Petitioner respectfully requests his immediate release, or
8 in the alternative, a new bond hearing before an Immigration Judge to reassess his
9 continued detention in light of his long-standing equities, rehabilitation, medical
10 needs, and the extreme hardship his detention has caused his U.S.-citizen children—
11 particularly Ave, who is suffering severe emotional trauma due to her father's
12 ongoing absence.
13

14 CLAIMS FOR RELIEF

15 COUNT I 16 Violation of the INA

17 53. Petitioner incorporates by reference the allegations of fact set forth in
18 the preceding paragraphs.
19

20 54. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not
21 apply to all noncitizens residing in the United States who are subject to the grounds
22 of inadmissibility. As relevant here, it does not apply to those who previously
23 entered the country and have been residing in the United States prior to being
24 apprehended and placed in removal proceedings by Respondents. Such noncitizens

1 are detained under § 1226(a), unless they are subject to § 1225(b)(1), § 1226(c), or
2 § 1231.

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

5

6 **COUNT II**
7 **Violation of the Bond Regulations**

8 56. Petitioner incorporates by reference the allegations of fact set forth in
9 preceding paragraphs.

10 57. In 1997, after Congress amended the INA through IIRIRA, EOIR and
11 the then-Immigration and Naturalization Service issued an interim rule to interpret
12 and apply IIRIRA. Specifically, under the heading of “Apprehension, Custody, and
13 Detention of [Noncitizens],” the agencies explained that “[d]espite being applicants
14 for admission, [noncitizens] who are present without having been admitted or
15 paroled (formerly referred to as [noncitizens] who entered without inspection) will
16 be eligible for bond and bond redetermination.” 62 Fed. Reg. at 10323 (emphasis
17 added). The agencies thus made clear that individuals who had entered without
18 inspection were eligible for consideration for bond and bond hearings before IJs
19 under 8 U.S.C. § 1226 and its implementing regulations.

20 58. Nonetheless, pursuant to *Matter of Yajure Hurtado*, EOIR has a policy
21 and practice of applying § 1225(b)(2) to individual like Petitioner.

59. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

COUNT III
Violation of Due Process

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

61. 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).

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

63. 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 Middle District of Georgia 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 23rd day of October, 2025.

Shirley C. Zambrano
GA BAR 741429
Zambrano Law LLC
1995 N. Park Place, Suite 360
Atlanta, GA 30339
(770) 769-5820
(770) 769-5810
szambrano@zambranolaw.com

Attorneys for Petitioner