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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA (LAS VEGAS)**

10 DANIEL REYES CRISTOBAL,

Case No. _____

11 A#



12
13 Petitioner-Plaintiff,

**VERIFIED PETITION FOR WRIT OF
HABEAS CORPUS UNDER 28 U.S.C.
§ 2241 AND COMPLAINT FOR
DECLARATORY/INJUNCTIVE
RELIEF**

14
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19 v.

20 Michael V. Bernacke, Field Office

21 Director, U.S. Immigration and Customs

22 Enforcement;

23 John Mattos, Warden, Nevada Southern

24 Detention Center;

25 Kristi Noem, Secretary, U.S. Department

**AND EMERGENCY MOTION FOR
TEMPORARY RESTRAINING
ORDER & PRELIMINARY
INJUNCTION**

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1 of Homeland Security;
2 Rodney S. Scott, Commissioner, U.S.
3 Customs and Border Protection; and
4 Pam Bondi, Attorney General of the
5 United States,
6 Respondents–Defendants.
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9 **INTRODUCTION**

- 10
11 1. Petitioner Daniel Reyes Cristobal (“Mr. Reyes”) is a long-time Las Vegas resident who
12 was arrested in the interior, transferred to ICE custody, and is now detained at the Nevada
13 Southern Detention Center (“NSDC”) in Pahrump, Nevada. On October 17, 2025, the Las
14 Vegas Immigration Court (IJ Lindsay Roberts) denied bond jurisdiction solely under Matter
15 of Yajure-Hurtado, 29 I&N Dec. 216 (BIA 2025). (Ex. 1, IJ Order Denying Bond.)
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17 2. Daniel is a long-time Las Vegas resident, a hard worker, a primary caregiver, and the
18 father of three U.S. citizen children, including [REDACTED] (born [REDACTED] and
19 [REDACTED], for whom Daneil has long provided daily care, academic
20 support, and stability. (Ex. 2, Affidavit of [REDACTED]; Ex. 3, Affidavit of
21 [REDACTED])
22
23 3. Daniel seeks this Court’s declaration that his custody is governed by **8 U.S.C. § 1226(a)**;
24 a **TRO/PI** enjoining reliance on § 1225(b)(2)/Yajure to foreclose bond; and an order
25 requiring a **prompt, procedurally adequate bond hearing—or release if not held by a**
26 **date certain.**
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1 **JURISDICTION AND VENUE**

2 4. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas), 28 U.S.C. § 1331 (federal
3 question), and the Suspension Clause to satisfy Petitioner’s prayer for release. Petitioner
4 challenges the legality of detention, not a discretionary bond amount.

5
6 5. Venue is proper in the District of Nevada because Petitioner is detained within this
7 District, and the immediate custodian and Field Office Director exercises its duty here, and
8 therefore custody is here. Habeas jurisdiction is in personam and runs to the custodian.

9 **PARTIES**

10 6. Petitioner is a noncitizen detained by ICE at NSDC, A# , with removal
11 proceedings pending in the Las Vegas Immigration Court.

12
13 7. Respondent Michael V. Bernacke is the Field Office Director for ICE with custody
14 authority over Petitioner.

15 8. Respondent John Mattos is the Warden of NSDC, where Petitioner is confined.

16
17 9. Respondents Kristi Noem, Rodney S. Scott, and Pamela J. Bondi are named to ensure
18 complete injunctive relief.

19 **EXHAUSTION AND PRUDENTIAL CONSIDERATIONS**

20 10. No statute requires exhaustion for this § 2241 claim. Alternatively, exhaustion is futile
21 because the BIA’s published Matter of Yajure-Hurtado categorically adopts a no-bond
22 position, as invoked below; the Immigration Judge has already refused bond jurisdiction
23 on that basis (Ex. 1).
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28 **FACTUAL ALLEGATIONS**

1 **A. Detention and Procedural Posture**

- 2 1. **Interior encounter → ICE transfer.** On or about **September 22, 2025**, Mr. Reyes was
3 arrested by **North Las Vegas Police** on municipal matters. ICE lodged a detainer and, on
4 **September 24, 2025**, assumed custody for immigration processing. DHS then issued a
5 **Notice to Appear** setting removal proceedings under **§ 1229a** in the **Las Vegas**
6 **Immigration Court**. The enforcement paperwork reflects **no wants or warrants** and **no**
7 **prior criminal history**.
8
9 2. **IJ denial based solely on Yajure.** On **October 17, 2025**, IJ **Lindsay Roberts** denied bond
10 **for lack of jurisdiction** under **Matter of Yajure-Hurtado**, without individualized
11 findings as to danger, flight, or alternatives. The EOIR order sets **appeal due 11/17/2025**.
12 (Attach as **Ex. 1**.)
13
14 3. **Identity and residence.** Mr. Reyes's date of birth is [REDACTED] He and his family
15 reside at [REDACTED] **NV 89108**, a fixed address used for
16 school, church, and family activities.
17
18 4. **NTA charges.** DHS charged **INA §§ 212(a)(6)(A)(i)** and **212(a)(7)(A)(i)(I)** (presence
19 without admission and immigrant without visa). He is in **§ 1229a** proceedings (not at the
20 border).
21
22 5. **Record discrepancy (children).** The I-213 asserts Mr. Reyes "**has no children.**" That
23 assertion is **refuted** by the **sworn affidavits** of his U.S.-citizen daughters [REDACTED] and
24 [REDACTED] and will be further corroborated by their **birth certificates**. (Attach **Exs. 2-4**)
25
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27 **B. Deep Community Ties & Work History (integrated)**

1 6. **Long-standing residence at a stable Las Vegas address.** Mr. Reyes has lived for years
2 with his family at [REDACTED], anchoring him to Clark County through school
3 calendars, medical care, church attendance, and extended-family routines.

4 7. **Embedded in a multi-generational family network.** The family maintains **regular**
5 **gatherings on both sides** during holidays and birthdays. Mr. Reyes is the **coordinator**
6 **and driver** for these events—roles that presuppose, and reinforce, a stable local presence.

7 8. **Active religious life and congregational involvement.** Beyond Sunday services, the
8 family attends weekday church activities. Mr. Reyes **encouraged and equipped** his
9 daughters to participate (e.g., choreography during worship), **purchasing modest outfits**
10 **and items** and assisting with practice. This reflects **ongoing, place-based ties** to a local
11 congregation and clergy who can attest to the family’s character and service.

12 9. **Hands-on parenting connected to schools and youth programs.** Mr. Reyes
13 consistently attended **soccer matches** and **orchestra/violin concerts** for his daughter
14 **Jacqueline**, routinely handling **transportation, hydration/snacks, and post-event**
15 **family time**—turning school events into family rituals that **build confidence and**
16 **community.**

17 10. **Daily caregiving of the minor son.** Mr. Reyes regularly takes his **minor son** [REDACTED] to
18 the **park**, goes on **walks**, and **plays soccer** with him, and was in the process of **seeking**
19 **school supports** tailored to the child’s shyness and academic struggles. These are
20 **predictable, local caregiving rhythms** now interrupted by detention.

21 11. **Dependable presence in family emergencies.** When **I** [REDACTED] was **hospitalized for a**
22 **week in June 2021 for low blood pressure**, Mr. Reyes **stayed overnight**, brought
23 comforts from home, and reassured her through treatment. Shortly thereafter, Mr. Reyes
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1 underwent an **appendectomy**, and the family reciprocated with care—demonstrating
2 **reciprocal, local support** that detention has destabilized.

3 12. **Years of steady landscaping work for Las Vegas clients.** Mr. Reyes has performed
4 **steady landscaping work** in the Las Vegas area for **years** (one client since **2017**), with
5 **twice-monthly maintenance** for rental properties and consistent **reliability and honesty**.
6

7 13. **USC children centered in Las Vegas.** L [REDACTED] (U.S. citizen, [REDACTED]) and
8 J [REDACTED] (U.S. citizen, [REDACTED]) describe Las Vegas as their **birthplace and**
9 **home**, with their father as the **day-to-day anchor** for **school, church, and family life**.
10

11 (Attach Exs. 2–4)

12 14. **Routine local obligations consistent with non-flight.** Mr. Reyes’s **fixed residence,**
13 **minor-child caregiving, church service, longstanding clients, and tax filing**
14 collectively reflect a **community-rooted wage earner** with predictable obligations—the
15 **opposite profile of a flight risk**.
16

17 **C. Child-Centered Hardship (affidavits)**

18 16. I [REDACTED] (USC, 17): Mr. Reyes taught her to **scooter and swim**, encouraged **church**
19 **participation**, and provided **moral guidance and practical support** (transportation,
20 costs). During her **2021 hospitalization**, his **overnight presence** and reassurance were
21 instrumental to recovery. Detention has **removed her primary emotional stabilizer,**
22 causing anxiety and loss of routines.
23

24 17. J [REDACTED] (USC, 21): Mr. Reyes is her **first call** for everyday problems; he models **calm**
25 **crisis-management and problem-solving**. He consistently attended **soccer and orchestra**
26 events, creating **family rituals** around school achievements. Since detention, Jacqueline
27 experiences **sleep disruption and heightened anxiety** and reports the **minor son’s**
28

1 confusion (the family has told him father is “out of town working” to shield him),
2 interrupting **park/walk/soccer** routines essential for the child’s socialization and health.

3 18. **Aggregate hardship.** The affidavits describe **compounded educational, emotional, and**
4 **developmental harms** to the children from the sudden loss of Mr. Reyes’s **daily care,**
5 **transport, guidance, and faith-community leadership**—harms that are **irreparable** and
6 worsening each day detention continues.
7

8 **D. Anticipated EOIR Relief: Cancellation of Removal (Non-LPR)**

9 19. Mr. Reyes **intends to file for non-LPR cancellation of removal** under **8 U.S.C. §**
10 **1229b(b)(1).** The record supports: (i) **continuous physical presence** well exceeding ten
11 years prior to NTA service; (ii) **good moral character,** including steady work, tax filing,
12 and faith/community service; and (iii) **exceptional and extremely unusual hardship** to
13 his U.S.-citizen children, as detailed above. The **children’s birth certificates** will be
14 submitted with the application, together with school, medical, church, employer, and tax
15 corroboration.
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19 **LEGAL BACKGROUND**

20 20. The INA prescribes three principal detention tracks for noncitizens in removal
21 proceedings. First, **8 U.S.C. § 1226** governs detention for individuals in **standard**
22 **removal proceedings before an Immigration Judge** under **§ 1229a.** See **8 C.F.R. §§**
23 **1003.19(a), 1236.1(d)** (authorizing IJ custody redeterminations for those detained under §
24 1226(a)); by contrast, certain noncitizens with specified criminal or security grounds are
25 subject to **mandatory detention under § 1226(c).**
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1 21. Second, **8 U.S.C. § 1225(b)** provides for **mandatory detention** in two narrow
2 “admissions” contexts: (i) expedited removal under **§ 1225(b)(1)** and (ii) certain **recent**
3 **arrivals “seeking admission”** processed under **§ 1225(b)(2)**.
4

5 22. Third, **8 U.S.C. § 1231** governs detention **after a final removal order**, including during
6 withholding-only proceedings. See **§ 1231(a)–(b)**.
7

8 23. This case concerns the **pre-final-order** detention provisions at **§§ 1226(a)** and
9 **1225(b)(2)**.
10

11 24. Congress enacted §§ 1226 and 1225 in **IIRIRA (1996)**, reorganizing detention authority
12 but preserving the basic division between **interior custody under § 1226** and
13 **admissions/border processing under § 1225**. See Pub. L. No. 104–208, Div. C, §§ 302–
14 03. Congress **recently amended § 1226(a)** in the **Laken Riley Act (2025)**, to address
15 criminal convictions warranting mandatory detention, an issue absent in this case, without
16 altering the longstanding role of **IJ bond authority for § 1226(a) detainees**.
17

18
19 25. Following IIRIRA, **EOIR and DHS** issued federal regulations as guidance which provide
20 that, as a **general matter, individuals who have entered this country without**
21 **inspection (EWI) and are placed in § 1229a proceedings are detained under § 1226,**
22 not § 1225. See **Inspection and Expedited Removal of Aliens; Detention and**
23 **Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed.**
24 **Reg. 10312, 10323 (Mar. 6, 1997)** (recognizing § 1226(a) detention with IJ bond
25 review).
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1 26. For decades thereafter, **noncitizens who were not treated as “arriving”** and were placed
2 in **ordinary § 1229a proceedings** received **bond hearings under § 1226(a)**, unless §
3 **1226(c)** applied. That practice accords with pre-IIRIRA law (**former § 1252(a)**) and
4 contemporaneous legislative history noting § **1226(a)** “restates” the detention authority
5 previously found in § 1252(a).
6

7 27. On **July 8, 2025**, ICE—“in coordination with” DOJ—issued an **Interim Guidance**
8 purporting to reclassify **all EWI noncitizens** as § **1225(b)(2)** detainees, regardless of
9 **when** or **where** they were apprehended, and irrespective of **years of residence** in the
10 United States.
11

12 28. The **Interim Guidance** (titled “**Interim Guidance Regarding Detention Authority for**
13 **Applicants for Admission**”) asserts that **all EWIs are now “applicants for admission”**
14 who must be detained **under § 1225(b)(2)(A)**, thereby **foreclosing IJ bond hearings**.
15 The policy applies nationwide and retroactively to long-settled residents.
16

17 29. On **September 5, 2025**, the BIA issued **Matter of Yajure-Hurtado, 29 I&N Dec. 216**
18 (**BIA 2025**), adopting the same position: **all noncitizens present without admission or**
19 **parole are subject to § 1225(b)(2)(A)** and thus **ineligible for IJ bond**.
20

21 30. In the months since, **dozens of federal district courts**—including multiple courts within
22 the Ninth Circuit—have **rejected** DHS/EOIR’s categorical § **1225(b)(2)** theory and
23 **declined to follow Yajure**, holding that § **1226(a)** governs detention of long-resident
24 EWIs in § **1229a** proceedings and ordering **prompt § 1226(a) bond hearings (or**
25 **release)** with appropriate procedural safeguards.
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1 31. The earliest wave of decisions arose after **Tacoma IJs** ceased providing bond hearings to
2 EWIs with long residence. The **Western District of Washington** held that reading of the
3 INA **likely unlawful**, concluding **§ 1226(a)**, not **§ 1225(b)**, governs persons **not**
4 **apprehended upon arrival** to the United States. **Rodriguez-Vazquez v. Bostock**, 779 F.
5 Supp. 3d 1239 (W.D. Wash. 2025).
6

7 32. Since then, **courts across the country** have adopted the same reading of the INA’s
8 **detention authorities**, granting **TRO/PI** relief and mandating **seven-day bond-hearing-**
9 **or-release** remedies with **DHS’s clear-and-convincing burden**, **ability-to-pay** and **ATD**
10 considerations, and **written findings**—and expressly **rejecting** the blanket reliance on **§**
11 **1225(b)(2)/Yajure** in interior cases.
12

13 33. The reason courts have **uniformly rejected** the 2025 policy and **Yajure** is textual and
14 structural: it **defies the INA**. The statutory scheme shows that **§ 1226(a)** is the **default**
15 detention authority for **§ 1229a** removal proceedings, while **§ 1225(b)** is a **specialized**
16 **border-inspection regime**.
17

18 34. **Section 1226(a)** by its terms governs detention “**pending a decision on whether the**
19 **[noncitizen] is to be removed from the United States.**” Those merits determinations
20 occur in **§ 1229a** proceedings to decide **inadmissibility or deportability**—the very
21 posture here.
22

23 35. Congress also wrote **§ 1226(c)** to encompass certain **inadmissibility** categories (e.g., **§**
24 **1182** grounds), confirming that **§ 1226** reaches **noncitizens charged as inadmissible**—
25 including some who entered without inspection. Under the familiar negative-implication
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1 canon, when **Congress creates specific exceptions (mandatory detention under §**
2 **1226(c))**, it **confirms that the statute otherwise applies**—i.e., § 1226(a) supplies **bond-**
3 **eligible** authority for everyone **not** covered by those exceptions. See, e.g., **Shady Grove**
4 **Orthopedic Assocs., P.A. v. Allstate Ins. Co., 559 U.S. 393, 400 (2010)**.

5
6 36. Accordingly, § 1226 applies to individuals charged as **inadmissible** and placed in § 1229a
7 **proceedings**—which is this case—unless a specific § 1226(c) exception applies. **Nothing**
8 in § 1226 excludes EWIs arrested in the **interior** from its scope.
9

10 37. By contrast, § 1225(b) is tailored to **border/port-of-entry inspections** of persons
11 **“seeking admission.”** Its mandatory detention scheme is rooted in **the government’s**
12 **admissions authority** at the **border**. See **Jennings v. Rodriguez, 583 U.S. 281, 287**
13 **(2018)** (describing § 1225(b)’s operation **“at the Nation’s borders and ports of entry”**).
14 Extending § 1225(b)(2) to **long-resident EWIs arrested in the interior** collapses the
15 statute’s core distinction and **nullifies § 1226(a)**.
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18 38. **Conclusion.** Because Petitioner **was not apprehended at the border** and is litigating
19 removability in § 1229a **proceedings**, § 1226(a) governs his detention, entitling him to an
20 **individualized IJ bond hearing**. The categorical reliance on § 1225(b)(2)/Yajure to
21 **foreclose IJ bond jurisdiction** is **contrary to the statute’s text, structure, history, and**
22 **decades of practice**, and should be enjoined.
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25 39. **Recent Nevada District Court practice (Las Vegas)**¹. In 2025, **Las Vegas judges**
26 **granted TRO/PI relief** in materially similar cases—**holding § 1226(a) governs** and
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28 ¹ **Maldonado Vázquez v. Feeley**, No. 2:25-cv-01542-RFB-EJY, 2025 WL 2676082 (D. Nev. Sept. 17, 2025) (granting PI; holds § 1226(a) governs and enjoins reliance on § 1225(b)(2) to deny bond

1 **enjoining reliance on § 1225(b)(2)/Yajure** to foreclose bond jurisdiction—then
 2 **ordering a bond hearing within seven (7) days or release**, with **DHS bearing a clear-**
 3 **and-convincing burden**, and with **ability-to-pay, ATD, and written findings**
 4 requirements.

6 CLAIMS FOR RELIEF

7 COUNT I – Detention Contrary to Statute (INA § 236(a); 28 U.S.C. § 2241).
 8 Respondents’ categorical reliance on § 1225(b)(2) and Yajure-Hurtado to deny bond
 9 jurisdiction is contrary to § 1226(a), which governs interior custody during removal
 10 proceedings.

12 COUNT II – Fifth Amendment Due Process. Prolonged civil detention without an
 13 individualized bond hearing violates due process. The Court should order a prompt,
 14 procedurally adequate bond hearing or release.

16 COUNT III – Habeas (Suspension Clause). The writ lies to test the legality of executive
 17 detention, and the Court should order a § 1226(a) bond hearing with adequate procedures,
 18 or release.

19 Emergency Motion for TRO and Preliminary Injunction (Winter factors)

20
 21 40. **Likelihood of success.** Daniel is an **interior arrestee** with long residence and pending
 22 relief (42B). The government’s position **categorically forecloses** bond based on §
 23 **1225(b)(2)/Yajure** rather than conducting the **individualized § 1226(a)** analysis
 24

25 **Sanchez Roman v. Noem**, No. 2:25-cv-01684-RFB-EJY, 2025 WL 2710211 (D. Nev. Sept. 23, 2025)
 26 (orders § 1226(a) bond hearing within 7 days or release; enjoins use of § 1225(b)(2))

27 **E.C. v. Noem**, No. 2:25-cv-01789-RFB-BNW (D. Nev. Oct. 14, 2025) (granting PI; incorporates
Maldonado; orders 7-day § 1226(a) bond hearing or release) (order on docket ECF 19)

28 **Carlos v. Noem**, No. 2:25-cv-01900-RFB-BNW (D. Nev. Oct. 10, 2025) (granting TRO; cites **Maldonado &**
Sanchez Roman; rejects § 1225(b)(2) theory and the EOIR automatic-stay practice) (order at ECF 21)

1 Congress prescribed. **Nevada district rulings** confronting this policy have already
2 determined that § 1226(a) governs and have enjoined the government from using §
3 **1225(b)(2)/Yajure** to block bond.

4
5 41. **Irreparable harm.** Every day of unlawful detention is irreparable. Here, hardship falls on
6 **USC children** who rely on Mr. Reyes's **daily care and stability**—including **prior**
7 **medical vulnerability** (L [REDACTED]'s 2021 hospitalization) and ongoing
8 emotional/educational impacts from the loss of his support.

9
10 42. **Balance of equities & public interest.** The equities and public interest favor
11 **individualized, lawful custody determinations.** The record shows **strong community**
12 **ties, stable employment, church and family involvement, and daily parenting**—all
13 undercutting flight risk and danger. (L [REDACTED] Aff.; J [REDACTED] Aff.) Tailored relief
14 protects both liberty and safety by ensuring consideration of **non-financial conditions**
15 and **ATDs.**

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18 43. **Requested TRO/PI terms (consistent with recent Nevada orders).** Order the
19 government to:

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- 22 • Provide a § 1226(a) **bond hearing within 7 days** before an IJ;
 - 23 • Place the **burden on DHS** to prove **danger or flight risk by clear and convincing**
24 **evidence;**
 - 25 • Require **contemporaneous written findings;**
 - 26 • Require consideration of **ability to pay** and **alternatives to detention;** and
- 27
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- If the hearing does **not** occur by the deadline, **release** Mario forthwith on appropriate conditions.

REQUESTED RELIEF

Petitioner respectfully asks the Court to:

- A. Declare that 8 U.S.C. § 1226(a) governs Petitioner’s detention and that reliance on § 1225(b)(2)/Yajure-Hurtado to deny bond jurisdiction is unlawful.
- B. Enjoin Respondents from withholding a bond hearing on that basis.
- C. Order a bond hearing within seven (7) days before an Immigration Judge under § 1226(a), at which DHS bears the burden by clear and convincing evidence to prove danger or flight risk, with consideration of ability to pay and alternatives to detention and with contemporaneous written findings; if no hearing occurs by the deadline, order immediate release on appropriate conditions.
- D. Grant any further just relief.

Attorney Verification (28 U.S.C. §§ 2242, 1746)

I, Jon Eric Garde, counsel for Petitioner, declare under penalty of perjury that the factual allegations in this Petition are true and correct to the best of my knowledge, information, and belief, based on my review of Petitioner’s records, court filings, agency records, and the attached exhibits, and on communications with Petitioner, who is presently detained at NSDC. Because Petitioner is detained and time is of the essence given the scheduled individual hearing on November 19, 2025, I am executing this verification on his behalf pursuant to 28 U.S.C. § 2242.

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Dated: 11/11/2025 at Las Vegas

/s/ Jon Eric Garde, Esq.

Jon Eric Garde, Esq. Counsel for Petitioner

CERTIFICATE OF SERVICE

I, Jon Eric Garde, Esq., hereby certify that on November 12, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, with copies sent by Certified Mail to the following:

1. Michael V. Bernacke, Field Office Director, ICE (ERO – Salt Lake City)
2975 Decker Lake Drive, Suite 100
West Valley City, UT 84119-6096
2. John Mattos, Warden, Nevada Southern Detention Center (CoreCivic)
2190 East Mesquite Avenue
Pahrump, NV 89060
3. Kristi Noem, Secretary, U.S. Department of Homeland Security
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4. Rodney S. Scott, Commissioner, U.S. Customs and Border Protection

1 CBP Headquarters
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3 Washington, DC 20229

4 5. Pamela J. Bondi, Attorney General of the United States
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7 Washington, DC 20530-0001
8

9
10 Respectfully submitted,

11
12 /s/ Jon Eric Garde, Esq.

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