JARED S. LAWRENCE (9808)
Attorney for Petitioner
LAWRENCE & LAWRENCE, PLLC
497 West 4800 South, Suite 200
Murray, UT 84123
Telephone: (801) 531-6600
Facsimile: (801) 521-3731
Email: jareds@utahimm.com

IN THE UNITED STATES DISTRICT COURT FOR THE

DISTRICT OF UTAH, CENTRAL DIVISION

CESAR ANGEL SUYO APAZA, Petitioner, v. TODD M. LYONS, IN HIS OFFICIAL CAPACITY AS ACTING DIRECTOR IMMIGRATION & CUSTOMS ENFORCEMENT (ICE); MICHAEL BERNACKE IN HIS OFFICIAL CAPACITY AS ACTING SALT LAKE CITY FIELD OFFICE DIRECTOR, ENFORCEMENT AND REMOVAL OPERATIONS, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE); UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE) (AGENCY); PAUL J. WIMMER, IN HIS OFFICIAL CAPACITY AS SHERIFF/WARDEN, TOOELE COUNTY JAIL, TOOELE COUNTY SHERIFF'S OFFICE; KRISTI NOEM IN HER OFFICIAL CAPACITY AS SECRETARY, UNITED STATES DEPARTMENT OF HOMELAND SECURITY; PAMELA BONDI IN HER OFFICIAL CAPACITY AS ATTORNEY GENERAL OF THE UNITED STATES; DAREN K. MARGOLIN IN HIS OFFICIAL CAPACITY AS DIRECTOR OF EXECUTIVE OFFICE FOR IMMIGRATION REVIEW; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW (AGENCY), Respondents.	PETITION FOR WRIT OF HABEAS CORPUS Case No. Judge

INTRODUCTION

1. Counsel is an attorney that practices almost exclusively immigration law and is licensed to practice in and resides in Utah.

2. The Petitioner resides in Utah and had retained counsel for immigration matters prior to having been arrested by Immigration & Customs Enforcement (ICE).

3. Petitioner, Cesar Angel Suyo Apaza, is in the physical custody of Respondents at the Tooele County Jail. He now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have concluded Petitioner is subject to mandatory detention.

4. Petitioner, by and through above-named counsel of record, submits this Petition for Writ of Habeas Corpus against the above-named Respondents for unlawful detention. Petitioner's immigration case number is [redacted]

5. Petitioner is a 45-year-old noncitizen who has resided continuously in the U.S. since about 2021. He is married to an US citizen and has one (1) US citizen child, age 18 respectively.

6. Petitioner's USC Spouse filed a spouse based I-130 Petition on his behalf, which has been approved. The I-130 Petition was just transferred to the National Visa Center so that we can file an I-601A Waiver. This Waiver will be based in part on a finding of extreme hardship to the USC Spouse, if there is a prolonged separation. In his absence, the USC Spouse will endure such a hardship without his aid and support.

7. Upon information and belief, Petitioner is charged with, inter alia, having entered the United States without inspection. 8 U.S.C. § 1182(a)(6)(A)(I). The Notice to Appear (NTA)

has not yet been filed with Immigration Court as he has not yet been moved to his final detention destination. The NTA is usually filed closer to the time that Petitioner will be moved or is moved to said destination.

8. Petitioner was arrested in Utah - far from any port of entry - and should be placed in removal proceedings under 8 U.S.C. § 1229a. He is not subject to expedited removal under § 1225(b)(1), nor to post-order detention under § 1231(a).

9. ICE has recently created a policy that refuses to issue a bond to Petitioners based upon a new policy interpreting detention statutes that are unsupported by the law, its history and precedent as discussed below. (Unpublished Memo Attached (at page 64) - https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission)

10. 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 inspection - to be an "applicant for admission" under 8 U.S.C. § 1225(b)(2)(A) and therefore subject to mandatory detention and will not entertain a bond hearing proceeding.

11. The Board of Immigration Appeals (BIA) has deemed that the immigration courts do not have the jurisdiction to grant bonds to detainees who have entered the country without inspection, including those that have been here for many years and that their detention is required under §1225(b)(2). *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

12. Petitioner's detention on this basis violates the plain language of the Immigration and Nationality Act (INA). 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.

13. 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.

14. Accordingly, Petitioner seeks a writ of habeas corpus requiring that he be released unless Respondents provide a bond hearing under § 1226(a) within fourteen (14) days.

JURISDICTION

15. Petitioner is in the physical custody of Respondents. Petitioner is currently detained at the Tooele County Jail in Tooele, Utah.

16. 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).

17. 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

18. 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 District of Utah, the judicial district in which Petitioner is currently detained.

19. 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 District of Utah.

REQUIREMENTS OF 28 U.S.C. § 2243

20. 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, the Respondents must file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

21. 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

22. Petitioner is a citizen of Peru who has been in immigration detention since November 18, 2025. After arresting Petitioner in Salt Lake City, Utah, ICE did not set bond and

is determined to be an arriving alien underneath their new policy. Petitioner has resided in the United States for longer than three (3) years.

23. Respondent Todd M. Lyons is the national Acting Director of Immigration & Customs Enforcement (ICE). As such, he is also over the ICE Salt Lake City Field Office and is being named because there is currently no acting director of that office. He is sued in his official capacity.

24. Respondent Michael Bernacke is the Acting Director of the ICE Salt Lake City Field Office and is being named because there is currently no acting director of that office and is sued in his official capacity.

25. Respondent Immigration & Customs Enforcement (ICE) is the federal agency responsible for implementing and enforcing the INA in removal proceedings, including bond determination.

26. Respondent Kristi Noem is the Secretary of the Department of Homeland Security (DHS). 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.

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

28. 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

(EOIR) and the immigration court system it operates is a component agency. She is sued in her official capacity.

29. Respondent Daren K. Margolin, as the Director of Executive Office for Immigration Review (EOIR) and is being named because there is currently no acting director of that office. He is sued in his official capacity.

30. Respondent Executive Office for Immigration Review (EOIR) is the federal agency responsible for implementing and enforcing the INA in removal proceedings, including custody redetermination in bond hearings.

31. Respondent Paul J. Wimmer, Tooele County Sheriff, is employed by Tooele County, Utah, and is the Warden of the Tooele County Jail, where Petitioner is detained. He has immediate physical custody of Petitioner. He is sued in his official capacity.

LEGAL FRAMEWORK

32. The INA prescribes three (3) basic forms of detention for the vast majority of noncitizens in removal proceedings.

33. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal proceedings before an Immigration Judge (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).

34. 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).

35. Lastly, 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).

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

37. 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).

38. 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).

39. 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. 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)).

40. 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.

41. The new policy, entitled "Interim Guidance Regarding Detention Authority for Applicants for Admission," claims that all persons who entered the United States without inspection shall now be deemed "applicants for admission" under 8 U.S.C. § 1225, and therefore are subject to mandatory detention provision under § 1225(b)(2)(A). The policy applies regardless of when a person is apprehended, and affects those who have resided in the United States for months, years, and even decades.

42. ICE has adopted this position even though federal courts have rejected this exact conclusion. For example, after 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, 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*, --- F. Supp. 3d --- 2025 WL 1193850 (W.D. Wash. Apr. 24, 2025); *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299, at *8 (D. Mass. July 7, 2025) (granting habeas petition based on same conclusion); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2267803

(S.D.N.Y. Aug. 8, 2025); *Diaz Martinez v. Hyde*, et al., No. CV 25-11613-BEM, 2025 WL 204238, at *2–3 (D. Mass. July 24, 2025).

43. The Board of Immigration Appeals (BIA) rejected decades of contrary practice and held that § 1225(b)(2), not § 1226(a), governs detention of those who enter without inspection ("EWI") and aided ICE's policy of mandatory detention of non-arriving aliens entering without inspection, restricting the immigration courts' jurisdiction to grant bond and deeming detainees who have entered the country without inspection as "applicants for admission." *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). *Yajure Hurtado* now prohibits the immigration courts from granting detainees who enter without inspection bond and subjecting them to mandatory detention. *Id.* at 228. This decision comports neatly with ICE's desired policy outcomes and is the basis for continued detention of the Petitioner.

44. DHS's interpretation defies the INA. As the *Rodriguez Vazquez* court explained, the plain text of the statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people like Petitioner.

45. Almost every federal court to examine this issue has agreed that section 236 applies rather than section 235 to noncitizens like the respondent and that they are therefore not subject to mandatory detention. *See e.g., Bautista v. Noem*, No. 5:25-cv-01873-SSS-BFM, ECF No. 14 at * 7-8 (C.D. Cal. July 28, 2025) (holding respondents failed to articulate any valid justification, legal or otherwise, for the application of § 1225 rather than § 1226 to the petitioners); *Rodriguez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025) (finding that the text of § 1226, canons of statutory interpretation, legislative history, and longstanding agency practice indicate that § 1226,

not § 1225(b)(2), applies to noncitizens arrested while living in the U.S.); *Ceja Gonzalez v. Noem*, No 5:25-cv-02054-ODW (C.D. Cal. Aug. 13, 2025) (rejecting the respondents' interpretation of § 1225(b) based on the statutory text); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099, at *8 (D. Ariz. Aug. 11, 2025), report and recommendation adopted sub nom; *Martinez v. Hyde*, No. CV 25-11613-BEM, 2025 WL 2084238, at *6 (D. Mass. July 24, 2025) (holding DHS's selective reading of section 1225 - which ignores its "seeking admission" language - violates the rule against surplusage and negates the plain meaning of the text); *Maldonado v. Olson*, No. 25-CV-3142 (SRN/SGE), 2025 WL 2374411, at *12 (D. Minn. Aug. 15, 2025) (holding that accepting DHS's "one-size-fits-all application of § 1225(b)(2) to all aliens, with no distinctions, would violate fundamental canons of statutory construction" . . . and "render § 1226 utterly superfluous" and that the "Laken Riley Act amendments to § 1226(c), the legislative history of the IIRIRA, and longstanding practice supports this holding."); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025) (holding a proper understanding of the relevant statutes, in light of their plain text, and uniform case law interpreting them, compels the conclusion that § 1225 does not apply to a noncitizen who has been residing in the U.S. for more than two years); *see also Reyes v. Raycraft*,, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Vazquez Garcia v. Noem*, No. 25-CV-02180, 2025 WL 254931 (S.D. Cal. Sept. 3, 2025).

46. Most recently, District of Nevada, in *Maldonado Vazquez v. Feeley*, No. 2:25-cv-01542-RFB-EJY (D. Nev. Sept. 9, 2025), held that EOIR's automatic stay regulation, 8 C.F.R. § 1003.19(i)(2) (Form EOIR-43), is unconstitutional because it deprives noncitizens of liberty

without due process. The court ordered same-day release of the petitioner and noted that DHS's reliance on § 1225(b)(2) to detain longsettled residents raises serious statutory and constitutional concerns.

47. As the federal cases demonstrate, the text and structure of the INA make clear that § 1226(a) applies to noncitizens apprehended in the interior, including those charged as inadmissible for entry without inspection.

48. 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]."

49. 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*, 2025 WL 1193850, at *12 (citing *Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)).

50. 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]."

51. 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*, 2025 WL 1193850, at *12 (*citing Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)).

52. 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.

53. 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).

54. Accordingly, the mandatory detention provision of § 1225(b)(2) 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

55. Petitioner has resided in the United States since 2021and lives in West Valley City, Utah.

56. On November 18, 2025, Petitioner was arrested by ICE. Petitioner is now detained at the Tooele County Jail.

57. Presumably, DHS will place Petitioner in removal proceedings before the 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.

58. Petitioner has been married to Iliana Marin Diaz, a US Citizen, since January 1, 2023. Petitioner has a US Citizen Child, Andrew Suyo Robonel, who is 18 years old.

59. Petitioner has been gainfully employed since about February, 2022.

60. Petitioner has no convictions other than two (2) minor traffic tickets.

61. Petitioner's spouse has an approved I-130 Petition for him and they are preparing a Waiver and consular processing. He is in the long process to becoming a Lawful Permanent Resident.

62. Petitioner is neither a flight risk nor a danger to the community.

63. Following Petitioner's arrest, ICE has issued a custody determination to continue Petitioner's detention without an opportunity to post bond or be released on other conditions.

64. As a result, Petitioner remains in detention. Without relief from this court, he faces the prospect of months, or even years, in immigration custody, separated from their family and community.

65. DHS's new policy was issued "in coordination with DOJ," which oversees the immigration courts. Further, as noted, the most recent unpublished BIA decision on this issue held

that persons like Petitioner are subject to mandatory detention as applicants for admission. Finally, in the *Rodriguez Vazquez* litigation, where EOIR and the Attorney General are defendants, DOJ has affirmed its position that individuals like Petitioner are applicants for admission and subject to detention under § 1225(b)(2)(A). *See* Mot. to Dismiss, *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC (W.D. Wash. June 6, 2025), Dkt. 49 at 27–31.

CLAIMS FOR RELIEF

COUNT I

Violation of the INA

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

67. 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.

68. Federal courts have repeatedly rejected DHS's recent attempt to apply § 1225(b)(2) to persons like Petitioner. *See Rodriguez Vazquez v. Bostock*, --- F. Supp. 3d ---, 2025 WL 1193850 (W.D. Wash. Apr. 24, 2025); *Gomes v. Hyde*, No. 1:25-cv-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Maldonado Vazquez v. Feeley*, No. 2:25-cv-01542-RFB-EJY (D.

Nev. Sept. 9, 2025). These courts have confirmed that § 1226(a), not § 1225(b)(2), governs detention for noncitizens apprehended after residing in the United States.

69. The Board of Immigration Appeals' recent decision in *Matter of Hurtado*, 29 I&N Dec. 216 (BIA 2025), adopting DHS's contrary position, is not binding on this Court. Hurtado represents an abrupt, unexplained reversal of decades of agency practice and is not entitled to deference.

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

COUNT II

Violation of Due Process

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

72. 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, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001).

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

74. 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, the Petitioner prays that this Court grant the following relief:

A. Assume jurisdiction over this matter;

B. Issue a writ of habeas corpus requiring that Respondents release Petitioner immediately, or in the alternative order, a constitutionally adequate bond hearing under 8 U.S.C. § 1226(a) within fourteen (14) days before a neutral decision maker and without the application of the BIA case of *Yajure Huertado*;

C. Enjoin Respondents from invoking or applying the EOIR-43 automatic stay regulation, 8 C.F.R. § 1003.19(i)(2), to override the Immigration Judge's custody determinations;

D. 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

E. Grant any other and further relief that this Court deems just and proper.

DATED this 21st day of November, 2025.

/S/ JARED S. LAWRENCE
JARED S. LAWRENCE
Attorney at Law

VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF PURSUANT TO 28 U.S.C. §2242

I am submitting this verification on behalf of Petitioner, because I am the Petitioner's attorney of record. I have discussed with Petitioner the events described in this Petition. I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

DATED this 21st day of November, 2025.

/S/ JARED S. LAWRENCE
JARED S. LAWRENCE
Attorney at Law