

1 Rene L. Valladares
 Federal Public Defender
 2 Nevada State Bar No. 11479
 3 *Jonathan M. Kirshbaum
 Assistant Federal Public Defender
 4 New York State Bar No. 2857100
 *Laura Barrera
 5 Assistant Federal Public Defender
 Michigan State Bar No. P80957
 6 411 E. Bonneville Ave., Ste. 250
 7 Las Vegas, Nevada 89101
 (702) 388-6577
 8 Jonathan_Kirshbaum@fd.org
 9 Laura_Barrera@fd.org

10 *Attorneys for Petitioner Jesus Verdugo-Carrasco

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 12
 13 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

14 Jesus Verdugo-Carrasco,
 15 Petitioner,
 16
 17 v.
 The United States of America, et. al,
 18 Respondents.

Case No. 2:25-cv-02374-CDS-BNW

Motion for Temporary Restraining Order

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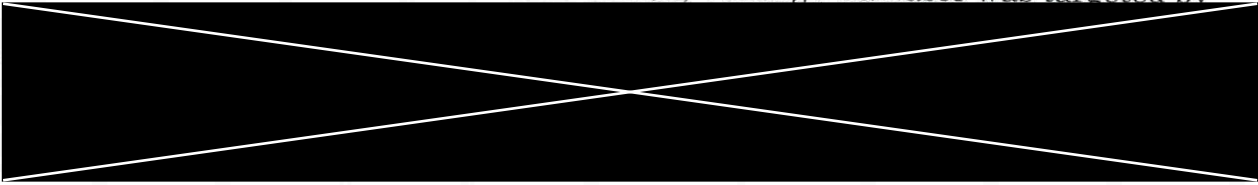
POINTS AND AUTHORITIES

Petitioner Jesus Verdugo-Carrasco faces immediate irreparable harm: (1) revocation of his release on immigration supervision (OSUP), despite ICE’s failure to follow its own revocation procedures; (2) indefinite immigration detention with no reasonable prospect of removal in the reasonably foreseeable future to the country designated by the immigration judge (“IJ”); and (3) potential removal to a third country never considered by an IJ. Beyond that, Petitioner’s family faces extraordinary hardship during his illegal detention because, upon belief, he is the primary caretaker of his wife and U.S. citizen children. This Court should grant temporary relief to preserve the status quo.

Verdugo-Carrasco, a citizen of Mexico, was ordered removed to Mexico on October 7, 2016. At the same time, he was granted deferral of removal to Mexico under the Convention Against Torture because it is likely he would be tortured if forced to return.¹ He was released from custody on or about October 14, 2016, on an order of supervision. He obtained a work permit. For over nine years now, he has been complying with his supervision and working to support his immediate family, including his U.S. citizen children.

During the past nine years, the United States has been unable to remove him. On November 5, 2025, Verdugo-Carrasco was on his way to work with his 18-year-old son when he was surrounded by unmarked vehicles. Armed ICE officers exited the vehicles and pointed their guns at him. He was arrested and taken into ICE custody. He was not given a reason for the arrest other than he had a “pending” order of removal.

¹ As discussed in the Amended Petition, Verdugo-Carrasco was targeted by



1 Respondents' re-detention of Verdugo-Carrasco is an egregious violation of
2 the Constitution, the Immigration and Nationality Act, and their own policies and
3 regulations. His continuing indefinite detention is also unconstitutional because
4 Respondents have no reason to believe that they will now be able to remove
5 Verdugo-Carrasco. He must be released immediately.

6 Petitioner is therefore facing both unlawful detention and a threat of removal
7 to a dangerous third country without due process. The requested temporary
8 restraining order ("TRO") would preserve the status quo while Petitioner litigates
9 these claims by (1) reinstating Petitioner's release on supervision, (2) prohibiting
10 the government from revoking his OSUP without first following the required
11 statutory procedures and (2) prohibiting the government from removing him to a
12 third country without an opportunity to file a motion to reopen with an IJ.

13 In granting this motion, this Court would not break new ground. Numerous
14 courts have released re-detained immigrants after finding that the petitioner's
15 statutory or constitutional rights were violated when ICE failed to comply with
16 applicable regulations in re-detaining the petitioner. *See e.g. Ghafouri v. Noem, et.*
17 *al.*, No. 3:25-CV-02675-RBM-BLM, 2025 WL 3085726 (S.D. Cal. Nov. 4, 2025);
18 *Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 166 (W.D.N.Y. 2025); *You v. Nielsen*, 321
19 F. Supp. 3d 451,463 (S.D.N.Y. 2018); *Rombot v. Souza*, 296 F. Supp. 3d 383,387 (D.
20 Mass. 2017); *Zhu v. Genalo*, No. 1:25-CV-06523 (JLR), 2025 WL 2452352, at *7-9
21 (S.D.N.Y. Aug. 26, 2025); *M.S.L. v. Bostock*, No. 6:25-CV-01204-AA, 2025 WL
22 2430267, at *10-12 (D. Or. Aug. 21, 2025); *Escalante v. Noem*, No. 9:25-CV-00182-
23 MJT, 2025 WL 2491782, at *2-3 (E.D. Tex. July 18, 2025); *Hoac v. Becerra*, No. 2:25-
24 cv-01740-DC-JDP, 2025 WL 1993771, at *4 (E.D. Cal. July 16, 2025); *Liu*, 2025 WL
25 1696526, at *2; *M.Q. v. United States*, 2025 WL 965810, at *3, *5 n.1 (S.D.N.Y. Mar.
26 31, 2025); *Rokhfirooz v. Larose*, No. 25-CV-2053-RSH-VET, 2025 WL 2646165, (S.D.
27 Cal. Sept. 15, 2025).

1 relief, that the balance of equities tips in his favor, and that an injunction is in the
2 public interest.” *Winter v. Nat. Res. Def Council, Inc.*, 555 U.S. 7, 20 (2008); accord
3 *Stuhlbarg Int’l Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 839-40 & n.7 (9th
4 Cir. 2001) (noting that a TRO and preliminary injunction involve “substantially
5 identical” analysis). A “variant[] of the same standard” is the “sliding scale”: “if a
6 plaintiff can only show that there are ‘serious questions going to the merits’—a
7 lesser showing than likelihood of success on the merits—then a preliminary
8 injunction may still issue if the balance of hardships tips *sharply* in the plaintiff’s
9 favor, and the other two *Winter* factors are satisfied.” *Immigrant Defenders Law
10 Center v. Noem*, 145 F.4th 972, 986 (9th Cir. 2025) (internal quotation marks
11 omitted). Under this approach, the four *Winter* elements are “balanced, so that a
12 stronger showing of one element may offset a weaker showing of another.” *All. for
13 the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131 (9th Cir. 2011). A TRO may be
14 granted where there are “‘serious questions going to the merits’ and a hardship
15 balance ... tips sharply toward the plaintiff,” and so long as the other *Winter* factors
16 are met. *Id.* at 1132.

17 Here, this Court should issue a temporary restraining order because
18 “immediate and irreparable injury . . . or damage” is occurring and will continue in
19 the absence of an order. Fed. R. Civ. P. 65(b). Not only have Respondents re-
20 tained Petitioner in violation of his due process, statutory, and regulatory rights.
21 ICE policy also allows them to remove him to a third country in violation of his due
22 process, statutory, and regulatory rights. This Court should order Petitioner’s
23 release and enjoin removal to a third country with no or inadequate notice.

24 **I. Petitioner will likely succeed on the merits, or at a minimum,
25 Petitioner raises serious merits questions.**
26
27

1 In his amended § 2241 petition, Petitioner raises five claims that he has been
2 unconstitutionally detained and that he cannot be removed to a third country.
3 Petitioner addresses the merits of each claim below:

4 **A. Petitioner is likely to succeed on the merits of his claim that**
5 **ICE violated its own regulations (Ground 1).**

6 8 C.F.R. §§ 241.4(l), 241.13(i) provide extra process for re-detentions. These
7 regulations permit an official to “return[s] [the person] to custody” because they
8 “violate[d] any of the conditions of release.” 8 C.F.R. § 241.13(i)(1); *accord id.* §
9 241.4(l)(1). Otherwise, they permit revocation of release only if the appropriate
10 official (1) “determines that there is a significant likelihood that the alien may be
11 removed in the reasonably foreseeable future,” and (2) makes that finding “on
12 account of changed circumstances.” *Id.* § 241.13(i)(2).

13 No matter the reason for re-detention, the re-detained person is entitled to
14 “an initial informal interview promptly,” during which they “will be notified of the
15 reasons for revocation.” *Id.* §§ 241.4(l)(1), 241.13(i)(3). The interviewer must
16 “afford[] the [person] an opportunity to respond to the reasons for revocation,”
17 allowing them to “submit any evidence or information” relevant to re-detention and
18 evaluating “any contested facts.” *Id.*

19 ICE is required to follow its own regulations. *United States ex rel. Accardi v.*
20 *Shaughnessy*, 347 U.S. 260, 268 (1954); *see Alcaraz v. INS*, 384 F.3d 1150, 1162 (9th
21 Cir. 2004) (“The legal proposition that agencies may be required to abide by certain
22 internal policies is well-established.”). A court may review a re-detention decision
23 for compliance with the regulations. *See Gomez v. Mattos*, No. 2:25-CV-00975-GMN-
24 BNW, 2025 WL 3101994, at *3 (D. Nev. Nov. 6, 2025); *Phan v. Beccerra*, No. 2:25-
25 CV-01757, 2025 WL 1993735, at *3 (E.D. Cal. July 16, 2025); *Nguyen v. Hyde*, No.
26 25-cv-11470-MJJ, 2025 WL 1725791, at *3 (D. Mass. June 20, 2025) (citing *Kong v.*
27 *United States*, 62 F.4th 608, 620 (1st Cir. 2023)).

1 Here, none of the prerequisites to detention apply. ICE did not detain
2 Petitioner due to a violation. And there are no changed circumstances that justify
3 re-detaining him. An order of removal that was entered in 2016 clearly does not
4 constitute a “changed circumstance” under 8 C.F.R. § 241.13(i)(2). *Hoac v. Becerra*,
5 No. 2:25-CV-01740-DC-JDP, 2025 WL 1993771, at *4 (E.D. Cal. July 16, 2025)
6 (citing *Liu v. Carter*, No. 25-3036-JWL, 2025 WL 1696526, at *2 (D. Kan. June 17,
7 2025)). ICE failed to provide Petitioner with “reasons for revocation,” they failed to
8 allow Petitioner an “opportunity to respond to the reasons for revocation,” and
9 Petitioner was not allowed to “submit any evidence or information” relevant to re-
10 detention and evaluating “any contested facts.” 8 C.F.R. §§ 241.4(l)(1), 241.13(i)(3).

11 “[B]ecause officials did not properly revoke petitioner’s release pursuant to
12 the applicable regulations,” this Court will likely find that “petitioner is entitled to
13 his release” on an order of supervision. *Liu*, 2025 WL 1696526, at *3.

14
15 **B. Petitioner is likely to succeed on the merits of his claim that**
16 **his detention violates *Zadvydas* and the Immigration and**
Nationality Act, 8 U.S.C. § 1231(a)(6). (Grounds 2 and 3).

17 In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court considered a
18 problem affecting people like Petitioner: Federal law requires ICE to detain an
19 immigrant during the “removal period,” which typically spans the first 90 days after
20 the immigrant is ordered removed. 8 U.S.C. § 1231(a)(1)-(2). And after that 90-day
21 removal period expires, ICE may detain the migrant while continuing to try to
22 remove them. *Id.* § 1231(a)(6). If that subsection were understood to allow for
23 “indefinite, perhaps permanent, detention,” it would pose “a serious constitutional
24 threat.” *Zadvydas*, 533 U.S. at 699. In *Zadvydas*, the Supreme Court avoided the
25 constitutional concern by interpreting § 1231(a)(6) to incorporate implicit limits. *Id.*
26 at 689. As an initial matter, *Zadvydas* held that detention is “presumptively
27 reasonable” for six months after the removal order becomes final. *Id.* at 701.

1 After six months, detention ceases to be presumptively reasonable. Courts
2 use a burden-shifting framework to decide whether detention remains authorized.
3 First, the petitioner must prove that there is “good reason to believe that there is no
4 significant likelihood of removal in the reasonably foreseeable future.” *Id.* If he does
5 so, the burden shifts to “the Government [to] respond with evidence sufficient to
6 rebut that showing.” *Id.* Ultimately, then, the burden of proof rests with the
7 government: The government must prove that there is a “significant likelihood of
8 removal in the reasonably foreseeable future,” or the immigrant must be released.
9 *Id.*

10 Here, Petitioner was ordered removed much more than 6 months ago, as his
11 removal order became final in 2016.² He was granted deferral from removal under
12 the Convention Against Torture. The Government was not able to remove him since
13 2016. He was then re-detained on November 5, 2025. Due to the relief under the
14 Convention Against Torture, there is no reasonable likelihood of removal, so
15 Verdugo-Carrasco will prevail. Thus, this Court will likely find that Petitioner
16 warrants *Zadvydas* relief.

17 **C. Petitioner is likely to succeed on the merits of his claim that he**
18 **is entitled to adequate notice and an opportunity to be heard**
19 **prior to any third country removal (Grounds 4 and 5).**

20 Finally, Petitioner is likely to succeed on the merits of his claim that he may
21 not be removed to a third country absent adequate notice and an opportunity to be
22 heard.

23 U.S. law enshrines protections against dangerous and life-threatening
24 removal decisions. By statute, the government is prohibited from removing an
25 immigrant to any third country where a person may be persecuted or tortured, a
26 form of protection known as withholding of removal. *See* 8 U.S.C. § 1231(b)(3)(A).

27 ² *See* Amended Petition at 4-5.

1 The government “may not remove [a noncitizen] to a country if the Attorney
2 General decides that the [noncitizen's] life or freedom would be threatened in that
3 country because of the [noncitizen's] race, religion, nationality, membership in a
4 particular social group, or political opinion.” *Id.*; *see also* 8 C.F.R. §§ 208.16,
5 1208.16. Withholding of removal is a mandatory protection.

6 Similarly, Congress codified protections enshrined in the Convention Against
7 Torture (CAT) prohibiting the government from removing a person to a country
8 where they would be tortured. *See* FARRA 2681-822 (codified as 8 U.S.C. § 1231
9 note) (“It shall be the policy of the United States not to expel, extradite, or
10 otherwise effect the involuntary return of any person to a country in which there
11 are substantial grounds for believing the person would be in danger of being
12 subjected to torture, regardless of whether the person is physically present in the
13 United States.”); 28 C.F.R. § 200.1; *id.* §§ 208.16-208.18, 1208.16-1208.18. CAT
14 protection is also mandatory.

15 To comport with the requirements of due process, the government must
16 provide notice of the third country removal and an opportunity to respond. Due
17 process requires “written notice of the country being designated” and “the statutory
18 basis for the designation, i.e., the applicable subsection of § 1231(b)(2).” *Aden v.*
19 *Nielsen*, 409 F. Supp. 3d 998, 1019 (W.D. Wash. 2019); *accord D.V.D. v. U.S. Dep't*
20 *of Homeland Sec.*, No. 25-cv-10676-BEM, 2025 WL 1453640, at *1 (D. Mass. May
21 21, 2025); *Andriasian v. INS*, 180 F.3d 1033, 1041 (9th Cir. 1999).

22 Due process also requires the following: “[A]sk[ing] the noncitizen whether he
23 or she fears persecution or harm upon removal to the designated country and
24 memorialize in writing the noncitizen's response. This requirement ensures DHS
25 will obtain the necessary information from the noncitizen to comply with section
26 1231(b)(3) and avoids [a dispute about what was said].” *Aden*, 409 F. Supp. 3d at
27 1019. “Failing to notify individuals who are subject to deportation that they have

1 the right to apply for asylum in the United States and for withholding of
2 deportation to the country to which they will be deported violates both INS
3 regulations and the constitutional right to due process.” *Andriasian*, 180 F.3d at
4 1041.

5 If the noncitizen claims fear, measures must be taken to ensure that the
6 noncitizen can seek asylum, withholding, and relief under CAT before an
7 immigration judge in reopened removal proceedings. The amount and type of notice
8 must be “sufficient” to ensure that “given [a noncitizen’s] capacities and
9 circumstances, he would have a reasonable opportunity to raise and pursue his
10 claim for withholding of deportation.” *Aden*, 409 F. Supp. 3d at 1009 (citing
11 *Mathews v. Eldridge*, 424 U.S. 319, 349 (1976) and *Kossov v. I.N.S.*, 132 F.3d 405,
12 408 (7th Cir. 1998)); *cf. D.V.D.*, 2025 WL 1453640, at *1 (requiring a minimum of 15
13 days notice).

14 “[L]ast minute” notice of the country of removal will not suffice, *Andriasian*,
15 180 F.3d at 1041; *accord Najjar v. Lunch*, 630 Fed. App’x 724 (9th Cir. 2016), and
16 for good reason: To have a meaningful opportunity to apply for fear-based protection
17 from removal, immigrants must have time to prepare and present relevant
18 arguments and evidence. Merely telling a person where they may be sent, without
19 giving them a chance to look into country conditions, does not give them a
20 meaningful chance to determine whether and why they have a credible fear.

21 Respondents’ third country removal policy skips over these statutory and
22 constitutional procedural protections. According to ICE’s July 9, 2025 Directive,
23 individuals can be removed to third countries “without the need for further
24 procedures,” so long as “the [U.S.] has received diplomatic assurances.”³ Petitioner
25 is likely to succeed on the merits of his claim on this fact alone, because the policy
26

27 ³ Amended Petition Ex. 5.

1 instructs officers to provide no notice or opportunity to be heard of any kind. The
2 same is true of the minimal procedures ICE offers when no diplomatic assurances
3 are present. The policy provides no meaningful notice (only 6-24 hours), instructs
4 officers not to ask about fear, and provides no actual opportunity to see counsel and
5 prepare a fear-based claim (6-24 hours), let alone reopen removal proceedings. In
6 sum, it directs ICE officers to violate the rights of those whom they seek to subject
7 to the third country removal program.

8 Faced with similar arguments, several courts have recently granted
9 individual TROs against removal to third countries. See *Rodriguez-Gutierrez*, No.
10 25-cv-02726-BAS-SBC (S.D. Cal. Nov. 7, 2025) *J.R.*, 2025 WL 1810210; *Vaskanyan*,
11 2025 WL 2014208; *Ortega*, 2025 WL 1771438; *Hoac*, 2025 WL 1993771, at *7; *Phan*,
12 2025 WL 1993735, at *7.

13 Because ICE's new policies for third country removal fail to comply with
14 existing law, they also violate the Administrative Procedures Act. Furthermore,
15 given the blatant unlawfulness and unconstitutionality of ICE's policies,
16 Petitioner's detention under the color of those policies is unlawful.

17 **II. Petitioner will suffer irreparable harm absent injunctive relief.**

18 Petitioner also meets the second factor: irreparable harm. "It is well
19 established that the deprivation of constitutional rights 'unquestionably constitutes
20 irreparable injury.'" *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012)
21 (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)). Where the "alleged deprivation
22 of a constitutional right is involved, most courts hold that no further showing of
23 irreparable injury is necessary." *Warsoldier v. Woodford*, 418 F.3d 989, 1001-02 (9th
24 Cir. 2005) (quoting 11A Charles Alan Wright et al., *Federal Practice and Procedure*,
25 § 2948.1 (2d ed. 2004)).

26 Here, the potential irreparable harm to Petitioner is even more concrete. His
27 detention has prevented from providing for his family, which includes U.S. citizen

1 children. Furthermore, unlawful detention itself “constitutes extreme or very
2 serious damage, and that damage is not compensable in damages.” *Hernandez v.*
3 *Sessions*, 872 F.3d 976, 999 (9th Cir. 2017) (internal citations omitted).

4 Third-country deportations pose that risk and more. Recent third-country
5 deportees have been held, indefinitely and without charge, in hazardous foreign
6 prisons.⁴ They have been subjected to solitary confinement.⁵ They have been
7 removed to countries so unstable that the U.S. government recommends making a
8 will and appointing a hostage negotiator before traveling to them.⁶ These and other
9 threats to Petitioner’s health and life independently constitute irreparable harm.

10 **III. The balance of hardships and the public interest weigh heavily in** 11 **Petitioner’s favor**

12 The final two factors for a TRO—the balance of hardships and public interest—
13 “merge when the Government is the opposing party.” *Nken v. Holder*, 556 U.S.
14 418,435 (2009). That balance tips decidedly in Petitioner’s favor.

15 The government “cannot reasonably assert that it is harmed in any legally
16 cognizable sense” by being compelled to follow the law. *Zepeda v. I.N.S.*, 753 F.2d
17 719, 727 (9th Cir. 1983). Moreover, it is always in the public interest to prevent
18 violations of the U.S. Constitution and ensure the rule of law. *See Nken*, 556 U.S. at
19 436 (describing public interest in preventing noncitizens “from being wrongfully
20 removed, particularly to countries where they are likely to face substantial harm”);

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22 ⁴ Edward Wong et al., *Inside the Global Deal-Making Behind Trump’s Mass*
23 *Deportations*, N.Y. Times (Jun. 25, 2025), available at
24 [https://www.nytimes.com/2025/06/25/us/politics/trump-immigrants-](https://www.nytimes.com/2025/06/25/us/politics/trump-immigrants-deportations.html)
[deportations.html](https://www.nytimes.com/2025/06/25/us/politics/trump-immigrants-deportations.html)

25 ⁵ Gerald Imray, *Men deported by US to Eswatini in Africa will be held in*
26 *solitary confinement for undetermined time*, Associated Press (Jul. 18, 2025),
27 available at [https://apnews.com/article/eswatini-united-states-trump-deportation-](https://apnews.com/article/eswatini-united-states-trump-deportation-immigrants-a5853b16b7b275cbcbfe6caff87d0bb8)
[immigrants-a5853b16b7b275cbcbfe6caff87d0bb8](https://apnews.com/article/eswatini-united-states-trump-deportation-immigrants-a5853b16b7b275cbcbfe6caff87d0bb8)

⁶ *See* Wong, *supra*.

1 *Moreno Galvez v. Cuccinelli*, 387 F. Supp. 3d 1208, 1218 (W.D. Wash. 2019) (when
2 government's treatment "is inconsistent with federal law, . . . the balance of
3 hardships and public interest factors weigh in favor of a preliminary injunction.").

4 Petitioner also faces weighty hardships: unlawful, indefinite detention and
5 removal to a third country where he is likely to suffer imprisonment or other serious
6 harm. The balance of equities thus favors preventing the violation of "requirements
7 of federal law," *Arizona Dream Act Coal. v. Brewer*, 757 F.3d 1053, 1069 (9th Cir.
8 2014), by granting emergency relief to protect against unlawful detention and
9 prevent unlawful third country removal.

10 **CONCLUSION**

11 For those reasons, Petitioner requests that this Court issue a temporary
12 restraining order.

13 Dated December 22, 2025.

14 Respectfully submitted,

15
16 Rene L. Valladares
17 Federal Public Defender

18 /s/ Jonathan M. Kirshbaum
19 Jonathan M. Kirshbaum
20 Assistant Federal Public Defender


21 /s/ Laura Barrera
22 Laura Barrera
23 Assistant Federal Public Defender
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27

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on December 22, 2025. I personally served a true and correct copy of the foregoing index and exhibits in support of the first amended petition by CM/ECF to the following individuals:

Tamer Botros U.S. Attorney’s Office for District of NV 501 Las Vegas Blvd. South Ste # 1100 Las Vegas, NV 89101 Email: tamer.botros@usdoj.gov	Virginia Tomova DOJ-USAO 501 Las Vegas Blvd, South Suite 1100 Las Vegas, NV 89101 Email: virginia.tomova@usdoj.gov
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I further certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage pre-paid, or have dispatched it to a third party commercial carrier for delivery within three calendar days, to the following person:

Jesus Verdugo-Carrasco  Nevada Southern Detention Center 2190 E Mesquite Avenue Pahrump, NV 89060	Kristi Noem Secretary, United States Department of Homeland Security 245 Murray Lane SW Washington, DC 20528
John Mattos Warden Nevada Southern Detention Center 2190 E. Mesquite Ave., Pahrump, NV 89060	Pam Bondi Attorney General U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-001
Todd Lyons Acting Director U.S. Immigration and Customs Enforcement 500 12th Street SW Washington, DC 20536	Director Michael Bernacke ICE Enforcement and Removal Operations Field Office 2975 Decker Lake Drive, Suite 100 West Valley City, UT 84119
Kerri Ann Quihuis ICE Enforcement and Removal Operations Field Office 2975 Decker Lake Drive, Suite 100 West Valley City, UT 84119-6096	Sigal Chattah First US Attorney for the District of Nevada 501 Las Vegas Blvd, Ste 1100 Las Vegas, NV 89101 Email: Sigal.Chattah@usdoj.gov

1 Summer Allegra Johnson
2 DOJ-USAO
3 501 Las Vegas Blvd. South
4 Ste # 1100
5 Las Vegas, NV 89143
6 Email: summer.johnson@usdoj.gov

7
8 */s/ Victoria Lenzi*
9 _____
10 An Employee of the
11 Federal Public Defender
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