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9
10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF ARIZONA**

12 Ana Maria Camacho Rodriguez,)
13)
14)

15 Petitioner)

16 v.)

17 Kristi Noem, Secretary of the)
18 U.S. Department of Homeland Security,)

19 Pamela Bondi,)
20 Attorney General of the United States;)

21 Todd M. Lyons, Acting Director of)
22 Immigration and Customs Enforcement;)

23 Christopher Howard, Assistant Warden)
24 Of the Eloy Detention Center;)

25 Christopher McGregor, Field Office)
26 Director for Enforcement and Removal)
27 Operations,)
28 U.S. Department of Homeland Security;)
In their official capacities,)

Respondents)

Case No. _____

PETITION FOR WRIT OF
HABEAS CORPUS
UNDER 28 U.S.C. § 2241

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I. INTRODUCTION

1. Petitioner, Ana Maria Camacho Rodriguez, ~~XXXXXXXXXX~~, is being detained unlawfully at the Eloy Detention Center in the custody of U.S. Immigration Customs and Enforcement (“ICE”). Petitioner is a noncitizen and longtime resident of the United States who is harmed by Respondents’ new, draconian policy reinterpreting the immigration detention statutes to preclude Petitioner from eligibility for bond under the Immigration and Nationality Act (INA), 8 U.S.C. § 1226(a), and for bond hearings under 8 C.F.R. §§ 1003.19(a), 1235.1(d). Instead, pursuant to this new policy, Respondents now consider Petitioner as subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A), without the opportunity for release on bond during the pendency of his lengthy removal proceedings.

2. Petitioner brings this habeas corpus action pursuant to 28 U.S.C. § 2241 to challenge her continued unlawful detention by Immigration and Customs Enforcement (ICE) in violation of the Immigration and Nationality Act (INA) and the Fifth Amendment to the U.S. Constitution.

3. Absent an Order from this Court, Petitioner will continue to be unlawfully held in detention by ICE.

4. Petitioner asks this Court to find that Petitioner is being unlawfully detained by ICE and order that Petitioner be immediately released from unlawful detention.

II. REQUIREMENTS OF 28 U.S.C. § 2243

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

6. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to

1 as “perhaps the most important write known to the constitutional law of England,
2 affording as it does a *swift* and imperative remedy in all cases of illegal restraint or
3 confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

4 III. JURISDICTION

5 7. Petitioner is in the physical custody of Respondents and is detained
6 at the Eloy Detention Center in Eloy, Arizona.

7 8. Petitioner’s case arises under 28 U.S.C. §2241, and her claims
8 further arise under the INA, 8 U.S.C. § 1101-1538, and its implementing regulations;
9 the APA, 5 U.S.C. §§ 500-596, 701-706; and the U.S. Constitution.

10 9. This Court has jurisdiction pursuant to 28 U.S.C. § 1331, as this is a
11 civil action arising the laws of the United States, and under 28 U.S.C. §2241 as the
12 case challenges Petitioner’s unlawful detention.

13 10. The Court may grant relief pursuant to 28 U.S.C. § 2241; the
14 Declaratory Judgment Act, 28 U.S.C. § 2201; the APA, 5 U.S.C §§ 702, 706; the All
15 Writs Act, 28 U.S.C § 1651; Federal Rules of Civil Procedure 65; and the Court’s
16 inherent equitable powers.

17 IV. VENUE

18 11. Venue properly lies in the District of Arizona under 28 U.S.C §
19 1391(e), because Petitioner is detained in this District.

20 12. In addition, venue is proper in this District because Respondents are
21 officers, employees, or agencies of the United States and because a substantial part of
22 the events or omissions giving rise to the claims occurred in the District of Arizona.

23 V. PARTIES

24 13. Petitioner, Ana Maria Camacho Rodriguez, is a native and citizen
25 of Mexico who has resided in the United States for twenty years and is currently
26 detained by ICE at the Eloy Detention Center.

27 14. Respondent, Christopher Howard, is the legal custodian of
28 Petitioner. Christopher Howard is an employee of CoreCivic which is the company

1 that owns and operates the Eloy Detention Center. Christopher Howard is the
2 Assistant Warden of the Eloy Detention Center where Petitioner is being held in
3 custody, and is sued in his official capacity. Petitioner has been informed and believes
4 that the office of Warden of the Eloy Detention Center is currently vacant.

5 15. Respondent Christopher McGregor is the Acting Field Office
6 Director of Enforcement and Removal Operations for Immigration and Customs
7 Enforcement within the State of Arizona, an agency of the Department of Homeland
8 Security, and is sued in his official capacity.

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

13 17. Respondent Kristi Noem is the Secretary of Homeland Security of
14 the United States. She is responsible for the implementation and enforcement of the
15 INA, and oversees ICE, which is responsible for Petitioner's detention. Respondent
16 Noem has ultimate custodial authority over Petitioner and is sued in her official
17 capacity.

18 18. Respondent Todd M. Lyons is the Acting Director of U.S.
19 Immigration and Customs Enforcement and is sued in his official capacity.

20 VI. LEGAL FRAMEWORK

21 19. Petitioner's detention violates the plain language of the INA and its
22 implementing regulations. Respondents' new legal interpretation set forth in *Matter of*
23 *Yajure Hurtado* is plainly contrary to the statutory framework and its implementing
24 regulations.

25 20. The INA prescribes three basic forms of detention for the vast
26 majority of noncitizens in removal proceedings. The detention provisions at 8 U.S.C.
27 § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and
28 Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104-208, Div. C, §§ 302–

1 03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section 1226 was most
2 recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat.
3 3 (2025).

4 21. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in
5 standard removal proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals in
6 Section 1226(a) detention are generally entitled to a bond hearing at the outset of their
7 detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been
8 arrested, charged with, or convicted of certain crimes are subject to mandatory
9 detention until their removal proceedings are concluded, *see* 8 U.S.C. § 1226(c).
10 According to the Supreme Court, “§ 1226(c) applies to aliens already present in the
11 United States. Section 1226(a) creates a default rule for those aliens...” *Jennings v.*
12 *Rodriguez*, 138 S.Ct. 830 (2018). The Court states, “Section 1226(a) also permits the
13 Attorney General to release those aliens on bond, ‘[e]xcept as provided in subsection
14 (c) of this section.’”

15 22. Second, Section 1225 governs DHS’s inspection of noncitizens
16 who arrive the borders and ports of entry of the United States. Section 1225 provides
17 for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. §
18 1225(b)(1) and for other recent arrivals “seeking admission” referred to under §
19 1225(b)(2). 8 U.S.C. § 1225(b)(2)(A) applies to individuals who are apprehended on
20 arrival in the United States. It states that an “applicant for admission” who is “seeking
21 admission” shall be detained for a removal proceeding under section 1229a. *Id.* It
22 does not apply to individuals like Petitioner who are arrested and detained by ICE after
23 having entered and begun residing in the United States many years earlier, who are not
24 “seeking admission.”

25 23. Last, the INA also provides for detention of noncitizens who have
26 received a final order of removal from the United States, including individuals in
27 withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b). This section does not
28 apply to Petitioner in this case because he does not have a final order of removal.

1 24. Petitioner’s case concerns the detention provisions at § 1226(a) and
2 § 1225(b)(2).

3 25. For decades, Respondents have applied § 1226(a) to people like
4 Petitioner who entered the United States without inspection and have lived in the
5 United States for many years.

6 26. In the decades that followed the passage of IRRIRA in 1996,
7 people who had entered without inspection and were thereafter arrested within the
8 United States and placed in removal proceedings were considered for release on bond
9 and also received bond hearings before an IJ under Section 1226, unless their criminal
10 history rendered them ineligible. This practice by EOIR, INS, and then DHS, was a
11 reflection of and implementation of the law as it is written.

12 27. However, on July 8, 2025, Defendants adopted an entirely new
13 interpretation of the statute, one not supported by the law. On that day, ICE, “in
14 coordination with the Department of Justice (DOJ),” announced a corresponding
15 policy that rejected the well-established understanding of the statutory and regulatory
16 framework and reversed decades of practice. The new policy, entitled “Interim
17 Guidance Regarding Detention Authority for Applicants for Admission,” (known as
18 “the Lyons Memo”) authored by Defendant Todd Lyons, claims that all persons who
19 entered the United States without inspection shall now be deemed subject to
20 mandatory detention under § 1225(b)(2)(A). *Id.* The policy applies regardless of when
21 a person is apprehended, and affects those who have resided in the United States for
22 months, years, and even decades. The Lyons memo is an unlawful agency
23 interpretation that conflicts with statute, precedent, and due process.

24 28. DHS’s and DOJ’s interpretation set forth in the Lyons memo and
25 *Matter of Yajure Hurtado* defies the INA. Section 1226(a) applies by default to all
26 persons “pending a decision on whether the [noncitizen] is to be removed from the
27 United States.” These removal hearings are held under § 1229a, to “decid[e] the
28 inadmissibility or deportability of a[] [noncitizen].”

1 29. The text of § 1226 also explicitly applies to people charged as
2 being inadmissible, including those who entered without inspection. *See* 8 U.S.C. §
3 1226(c)(1)(E). Just this year in early 2025, Congress added subparagraph (E) to
4 Section 1226(c)(1) by enacting the Laken Riley Act to exclude certain noncitizens who
5 entered without inspection from § 1226(a)'s default bond eligibility. Under the Laken
6 Riley Act, a noncitizen who entered the U.S. without inspection *and* has been accused
7 of theft-related crimes is not eligible for bond. By adding a provision relating to a
8 person who entered without inspection and has been accused of a theft-related crime
9 the Laken Riley Act actually assumes that a person who entered without inspection
10 *and has not been accused or convicted* of a theft-related crime *is* eligible for bond, as a
11 general rule. Section 1226(c)(1)(E)'s reference to persons inadmissible under §
12 1182(6)(A), i.e., persons inadmissible for entering without inspection, makes clear
13 that, *by default*, such people are eligible for release on bond under Section 1226(a), if
14 that person has not been accused or convicted of a theft-related crime. As the
15 *Rodriguez Vazquez* court explained, “[w]hen Congress creates “specific exceptions” to
16 a statute’s applicability, it “proves” that absent those exceptions, the statute generally
17 applies. *Rodriguez Vazquez*, 2025 WL 1193850, at *12 (citing *Shady Grove*
18 *Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)). Otherwise,
19 Section 1226(c)(1)(E) would be surplusage. Section 1226 therefore leaves no doubt
20 that it applies to people who are present without admission or parole.

21 30. By contrast, § 1225(b) applies to people arriving at U.S. ports of
22 entry or who very recently entered the United States. The statute’s entire framework is
23 premised on inspections at the border of people who are “*seeking admission*” to the
24 United States. 8 U.S.C. § 1225(b)(2)(A); *see also Diaz Martinez*, 2025 WL 2084238,
25 at *8 (“[O]ur immigration laws have long made a distinction between those
26 [noncitizens] who have come to our shores seeking admission . . . and those who are
27 within the United States after an entry, irrespective of its legality.” (quoting *Leng May*
28 *Ma v. Barber*, 357 U.S. 185, 187 (1958))). Indeed, the Supreme Court has explained

1 that this mandatory detention scheme applies “at the Nation’s borders and ports of
2 entry, where the Government must determine whether a[] [noncitizen] seeking to enter
3 the country is admissible.” *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018).
4 Accordingly, the mandatory detention provision of § 1225(b)(2) does not apply to
5 people like Petitioner, who has already entered and was residing in the United States at
6 the time he was apprehended.

7 38. Since Respondents adopted their new policies, dozens of federal
8 courts have rejected their new interpretation of the INA’s detention authorities. Courts
9 have likewise rejected *Matter of Yajure Hurtado*, which adopts the same reading of the
10 statute as ICE. Even before ICE or the BIA introduced these nationwide policies, IJs
11 in the Tacoma, Washington, immigration court stopped providing bond hearings for
12 persons who entered the United States without inspection and who have since resided
13 here. There, the U.S. District Court in the Western District of Washington found that
14 such a reading of the INA is likely unlawful and that § 1226(a), not § 1225(b), applies
15 to noncitizens who are not apprehended upon arrival to the United States. *Rodriguez*
16 *Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025).

17 39. Subsequently, court after court has adopted the same reading of the
18 INA’s detention authorities and rejected ICE and EOIR’s new interpretation. *See, e.g.*,
19 *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025);
20 *Diaz Martinez v. Hyde*, No. CV 25-11613-BEM, --- F. Supp. 3d ----, 2025 WL
21 2084238 (D. Mass. July 24, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR
22 (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), *report and recommendation*
23 *adopted*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13,
24 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588
25 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025
26 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-
27 01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*,
28 No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No.

1 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ramirez Clavijo*
2 *v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263 (N.D. Cal. Aug. 21, 2025); *Leal-*
3 *Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 WL 2430025 (D. Md. Aug. 24,
4 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La.
5 Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), --- F. Supp. 3d ----,
6 2025 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v. Raycraft*, No. 2:25-cv-
7 12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez Garcia v.*
8 *Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025);
9 *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530
10 (C.D. Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL
11 2609425 (E.D. Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025
12 WL 2607924 (D. Mass. Sept. 9, 2025); *see also, e.g., Palma Perez v. Berg*, No.
13 8:25CV494, 2025 WL 2531566, at *2 (D. Neb. Sept. 3, 2025) (noting that “[t]he Court
14 tends to agree” that § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v.*
15 *Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL 2402271 at *3 (D. Neb. Aug. 19,
16 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224
17 at *2 (D. Neb. Aug. 14, 2025) (same). Accordingly, the mandatory detention provision
18 of §1225(b)(2)(A) does not apply to people like Petitioner, who have already entered
19 and were residing in the United States at the time they were apprehended.

20 42. Most recently, in the case of *Maldonado Bautista v. Santacruz*, No.
21 5-25-cv-01873-SSS-BFM, U.S. District Court Judge Sykes granted Partial Summary
22 Judgment for Declaratory Relief, finding that this new policy of DHS violates the INA
23 and Due Process. On November 25, 2025, Judge Sykes issued an Order Granting
24 Plaintiff Petitioners’ Motion for Class Certification, whereby the Court certified a
25 nationwide “Bond Eligible Class” which includes “All noncitizens in the United States
26 without lawful status who (1) have entered or will enter the United States without
27 inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will
28 not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the

1 time the Department of Homeland Security makes an initial custody determination.”
2 In the instant case, Petitioner is a member of the “Bond Eligible Class.” However,
3 immigration judges continue to find “No jurisdiction,” despite Judge Sykes’ Order for
4 Partial Summary Judgment on Declaratory Relief finding that DHS is violating the
5 INA and Due Process, and despite Class certification.

6 VII. FACTS

7 31. Petitioner is currently detained at the Eloy Detention Center in
8 Eloy, Arizona. Petitioner entered the United States without inspection in 2005, and
9 has lived in the United States continuously since that time. Petitioner has never been
10 convicted of any crime.

11 32. On or about November 13, 2025, Customs and Border Patrol, a
12 division of DHS, arrested Petitioner during a traffic stop near Blythe, California. DHS
13 issued a Form I-862 Notice To Appear, alleging that Petitioner is “an alien present in
14 the United States who has not been admitted or paroled.” The NTA further alleges that
15 Petitioner arrived in the United States in 2005 and that she was not then admitted or
16 paroled. She is charged with being subject to removal from the United States pursuant
17 to INA 212(a)(6)(A)(i), as “an alien present in the United States without being
18 admitted or paroled, or who arrived at any time or place other than as designated by the
19 Attorney General.” *See* 8 U.S.C. § 1182(a)(6)(A)(i).

20 33. On December 1, 2025, Petitioner had a bond redetermination
21 hearing with an immigration judge at the Eloy Immigration Court and the IJ denied
22 bond. This bond hearing was conducted under the provisions of 8 U.S.C. § 1226(a).
23 According to the written Order of the Immigration Judge dated November 13, 2025,
24 the reason for bond denial was because “Lack of jurisdiction. Matter of Yajure
25 Hurtado 29 I&N Dec. 216 (BIA 2025).” The IJ’s finding that he lacked of jurisdiction
26 to redetermine bond was based on the Board of Immigration Appeals case *Matter of*
27 *Yajure Hurtado* that anyone alleged to be inadmissible under § 1182(a)(6)(A)(i), i.e.,
28 those who entered the United States without inspection, should be subject to

1 mandatory detention under 8 U.S.C. § 1225(b)(2)(A) and therefore eligible for release
2 only by parole.

3 Petitioner is a member of the “Bond Eligible Class” in the case of *Maldonado*
4 *Bautista v. Santacruz*, No. 5-25-cv-01873-SSS-BFM, but Petitioner has not been
5 afforded an individualized bond redetermination hearing pursuant to that class
6 membership.

7 **VIII. CLAIMS FOR RELIEF**

8 **COUNT I**

9 **Violation of 8 U.S.C. § 1226(a)**

10 **Unlawful Denial of Release on Bond**

11 34. Petitioner incorporates by reference the allegations of fact set forth
12 in the preceding paragraphs.

13 35. The mandatory detention provision of 8 U.S.C. §1225(b)(2) does
14 not apply to all noncitizens residing in the United States who previously entered the
15 country and have been residing in the United States prior to being apprehended and
16 placed in removal proceedings by Respondents. It does not apply to those who
17 previously entered the country and have been residing in the United States prior to
18 being apprehended and placed in removal proceedings by Respondents. Such
19 noncitizens are detained under §1226(c), unless they are subject to §1225(b)(1),
20 §1225(c), or §1231.

21 36. The application of §1225(b)(2) to Petitioner unlawfully mandates
22 her continued detention and violates the INA.

23 **COUNT II**

24 **Violation of the Bond Regulations, 8 C.F.R. §§ 236.1, 1236.1 and 1003.19**

25 **Unlawful Denial of Release on Bond**

26 37. Petitioner incorporates by reference the allegations of fact set forth
27 in the preceding paragraphs.

28

1 placed in removal proceedings by Respondents. Such noncitizens are detained under §
2 1226(a) and are eligible for release on bond, unless they are subject to § 1225(b)(1), §
3 1226(c), or § 1231.

4 43. Nonetheless, DHS and EOIR through the Eloy Immigration Court
5 IJs have a policy and practice of applying § 1225(b)(2) to *Maldonado Bautista* Bond
6 Eligible Class Members such as Petitioner.

7 **COUNT IV**

8 **Violation of Due Process Under the Fifth Amendment**

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

11 45. The government may not deprive a person of life, liberty, or
12 property without due process of law. U.S. Const. amend. V. “Freedom from
13 imprisonment—from government custody, detention, or other forms of physical
14 restraint—lies at the heart of the liberty that the Clause protects.” *Zadvydas v. Davis*,
15 533 U.S. 678, 690 (2001).

16 46. Petitioner has a fundamental interest in liberty and being free from
17 official restraint.

18 47. The government’s detention of Petitioner without a bond
19 redetermination hearing to determine whether he is a flight risk or danger to others
20 violates her right to due process.

21 **IX. PRAYER FOR RELIEF**

22 WHEREFORE, Petitioner respectfully requests that this Court:

- 23 a. Assume jurisdiction over this matter;
- 24 b. Order that Petitioner shall not be transferred outside the District of
25 Arizona while this petition is pending
- 26 c. Issue an Order to Show Cause ordering Respondents to show cause why
27 this Petition should not be granted within 3 days;

- 1 d. Issue a Writ of Habeas Corpus requiring that Respondents release
2 Petitioner or, in the alternative, provide Petitioner with a bond hearing
3 pursuant to 8 U.S.C. § 1226(a) within seven days;
4 e. Declare that Petitioner's detention is unlawful;
5 f. Award Petitioner attorney's fees and costs under the Equal Access to
6 Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other
7 basis justified under law; and
8 g. Grant any other and further relief that this Court deems just and proper.
9 DATED this 5th day of December, 2025.

10 Respectfully submitted,

11 /s/ Robert E. Coughlon, Jr.

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