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8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 ALFONSO RANGEL VELAZQUEZ,

11 Petitioner,

12 v.

13 Christopher J. LAROSE, in his official  
14 capacity as Warden of Otay Mesa  
15 Detention Center; Daniel A.  
16 BRIGHTMAN, in his official capacity as  
17 San Diego Field Office Director, ICE  
18 Enforcement and Removal Operations;  
19 Todd LYONS, in his official capacity as  
20 Acting Director of ICE; Kristi NOEM, in  
21 her official capacity as Secretary of  
22 Homeland Security; Pamela BONDI, in  
23 her official capacity as U.S. Attorney  
24 General,

25 Respondents.

Case No.: '25CV3474 AGS DEB



Agency File No.: 

**PETITION FOR WRIT OF  
HABEAS CORPUS PURSUANT  
TO 28 U.S.C. § 2241;  
COMPLAINT FOR  
DECLARATORY AND  
INJUNCTIVE RELIEF**

1 Petitioner Alfonso Rangel Velazquez hereby files this Petition for Writ of  
2 Habeas Corpus under 28 U.S.C. § 2241 to compel his immediate release from  
3 unlawful detention, and states as follows:

4 **I. INTRODUCTION**

5  
6 1. Petitioner Alfonso Rangel Velazquez (hereinafter “Mr. Rangel Velazquez”)  
7 is a forty-seven year old Mexican national who is currently detained at the  
8 Otay Mesa Detention Center in San Diego, California.

9  
10 2. Mr. Rangel Velazquez entered the United States on or about February 1,  
11 1999. Before he was detained, Mr. Rangel Velazquez resided at   
12  in San Diego, California, with his wife and daughter.

13  
14 3. On December 6, 2021, Mr. Rangel Velazquez filed several applications for  
15 immigration benefits including a Form I-131, Application for Travel  
16 Document, with United States Citizenship and Immigration Services  
17 (“USCIS”).

18  
19 4. Mr. Rangel Velazquez’s Form I-131 was approved and on December 17,  
20 2024, Mr. Rangel Velazquez and his family traveled to Mexico City, Mexico,  
21 to visit family. They returned to the United States on January 5, 2025. At  
22 that time, Mr. Rangel Velazquez presented his approved travel document at  
23  
24

1 the Cross Border Express Otay Mesa port of entry and an immigration  
2 officer paroled him into the United States.

3 5. On or about September 8, 2025, Mr. Rangel Velazquez received a notice  
4 instructing him to appear for an interview at the Immigration and Customs  
5 Enforcement (“ICE”) San Diego Field Office on October 15, 2025, at 8:30  
6 a.m. Mr. Rangel Velazquez reported to the appointment as instructed.  
7

8 6. During the appointment, ICE issued Mr. Rangel Velazquez a Notice to  
9 Appear in Immigration Court, thereby revoking his parole. Also during the  
10 appointment, Mr. Rangel Velazquez was also taken into ICE custody and  
11 transferred to the Otay Mesa Detention Center, where he remains detained.  
12

13 7. Petitioner Alfonso Rangel Velazquez’s detention violates the Fifth  
14 Amendment of the United States Constitution. To vindicate Mr. Rangel  
15 Velazquez’s rights, this Court should grant the instant petition for a writ of  
16 habeas corpus.  
17

18 8. Mr. Rangel Velazquez further requests declaratory and injunctive relief to  
19 compel his immediate release from ICE custody, in which he has been  
20 detained since October 15, 2025, without first being provided a hearing to  
21 determine whether his detention was justified.  
22  
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1 9. Mr. Rangel Velazquez requests that this Court order his immediate release  
2 from detention and enjoin Respondents from re-detaining him unless there  
3 are changes in circumstances that would justify his detention.

4 **II. CUSTODY**

5  
6 10. Mr. Rangel Velazquez is currently in Respondents' legal and physical  
7 custody at the Otay Mesa Detention Center in San Diego, California. He is  
8 under Respondents' and their agents' direct control.

9  
10 **III. JURISDICTION AND VENUE**

11 11. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28  
12 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the Constitution  
13 (Suspension Clause), as Mr. Rangel Velazquez is presently in custody under  
14 the authority of the United States and challenging his detention as in  
15 violation of the Constitution, laws, or treaties of the United States.

16  
17 12. Federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear  
18 habeas claims by individuals challenging the lawfulness of their detention  
19 by ICE. *See Jennings v. Rodriguez*, 583 U.S. 281, 290-92 (2018).

20  
21 13. The aid of this Court is further invoked under 28 U.S.C. §§ 2201 and 2202,  
22 authorizing a declaratory judgment and any further necessary and proper  
23 relief.

24  
25 14. Venue is properly with this Court because a substantial part of the events  
26

1 giving rise to this claim occurred in this district and Mr. Rangel Velazquez  
2 is currently detained at the Otay Mesa Detention Center in San Diego,  
3 California. Venue is also proper pursuant to 28 U.S.C. § 1391(e) because  
4 the Respondents are all officers and agencies of the United States; Mr.  
5 Rangel Velazquez resides in this judicial district; and there is no real  
6 property involved in this action.  
7

#### 8 IV. PARTIES

9 15. Petitioner Alfonso Rangel Velazquez is a forty-seven year old Mexican  
10 national who resides in San Diego, California. He is currently detained by  
11 Respondents at the Otay Mesa Detention Center in San Diego, California,  
12 pending removal proceedings.  
13

14 16. Respondent Christopher J. LaRose is the Warden of Otay Mesa Detention  
15 Center. Respondent LaRose is responsible for the operation of the Detention  
16 Center where Mr. Rangel Velazquez is detained. As such, Respondent  
17 LaRose has immediate physical custody of Mr. Rangel Velazquez. He is  
18 being sued in his official capacity.  
19

20 21. Respondent Daniel A. Brightman is the San Diego Field Office Director  
21 (“FOD”) for ICE Enforcement and Removal Operations. Respondent  
22 Brightman is responsible for the oversight of ICE operations at the Otay  
23  
24  
25

1 Mesa Detention Center. Respondent Archambeault is being sued in his  
2 official capacity.

3 18. Respondent Todd Lyons is the Acting Director of ICE. Respondent Lyons is  
4 responsible for the administration of ICE and the implementation and  
5 enforcement of the immigration laws, including immigrant detention. As  
6 such, Respondent Lyons is a legal custodian of Mr. Rangel Velazquez and is  
7 being sued in his official capacity.  
8

9  
10 19. Respondent Kristi Noem is the Secretary of the Department of Homeland  
11 Security (“DHS”). As Secretary of DHS, Secretary Noem is responsible for  
12 the general administration and enforcement of the immigration laws of the  
13 United States. Respondent Secretary Noem is a legal custodian of Mr.  
14 Rangel Velazquez and is being sued in her official capacity.  
15

16 20. Respondent Pamela Bondi is the Attorney General of the United States and  
17 the most senior official in the U.S. Department of Justice. Respondent  
18 General Bondi is a legal custodian of Mr. Rangel Velazquez and is named in  
19 her official capacity.  
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21

22 **V. 28 U.S.C. § 2243 STATEMENT**

23 21. Unless Petitioner Alfonso Rangel Velazquez is wholly ineligible for relief,  
24 the Court must either grant the instant petition for writ of habeas corpus or  
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26

1 order Respondents to show cause as to why it should not be granted. 28  
2 U.S.C. § 2243. If so ordered, Respondents must file a response within three  
3 days.

4 22.Habeas corpus is “perhaps the most important writ known to the  
5 constitutional law ... affording as it does a swift and imperative remedy in  
6 all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400  
7 (1963).  
8

9  
10 23.Due to the nature and urgency of this proceeding, Mr. Rangel Velazquez asks  
11 this Court to expedite these proceedings as necessary and practicable for  
12 justice.  
13

#### 14 VI. EXHAUSTION OF ADMINISTRATIVE REMEDIES

15 24.Exhaustion of administrative remedies is a prudential, not jurisdictional,  
16 requirement in habeas claims. See 28 § U.S.C. 2241; *Laing v. Ashcroft*, 370  
17 F.3d 994, 998 (9th Cir. 2004). Exhaustion should not be required in this case  
18 because administrative remedies are futile and Mr. Rangel Velazquez’s  
19 continued detention will result in irreparable harm.  
20


21  
22 25.Exhaustion of administrative remedies in this case would be futile. Mr.  
23 Rangel Velazquez contends he was detained in violation of his due process  
24 rights, which is a claim that the agency cannot consider. As a result,  
25  
26

1 exhaustion of his remedies would be futile. *See American-Arab*  
2 *Anti-Discrimination Comm. v. Reno*, 70 F.3d 1045, 1058 (9th Cir. 1995).

3 26. Furthermore, the DHS has classified Mr. Rangel Velazquez as an “arriving  
4 alien” because he last entered the United States pursuant to a grant of  
5 advance parole. The Immigration Courts have declined to exercise custody  
6 jurisdiction over individuals the DHS has classified as “arriving aliens,”  
7 even when those individuals have lived in the United States for many years  
8 prior to departing the country on authorized travel, have pending  
9 applications for immigration benefits, and have significant ties to the United  
10 States. *See Matter of Oseiwusu*, 22 I&N Dec. 19 (BIA 1998).

11 27. Mr. Rangel Velazquez is experiencing irreparable harm while detained. He  
12 is depressed and is struggling to maintain his physical health which is  
13 already compromised due to high blood pressure. He is also suffering from  
14 the emotional toll of separation from his wife and daughter. The Court  
15 should consider this harm as Mr. Rangel Velazquez’s detention continues.

## 20 VII. STATEMENT OF FACTS

21 28. Petitioner Alfonso Rangel Velazquez is a Mexican national who was born on  
22  1978. He entered the United States on or around February 1,  
23

1 1999, when he was twenty-one years old. Since then, he has lived  
2 continuously in Southern California.

3 29.Mr. Rangel Velazquez is employed full-time in construction. He has  
4 obtained a California contractor's license and works as a supervisor for a  
5 construction company. He lives with his wife, who is a lawful permanent  
6 resident, and daughter, who is a United States citizen. All three members of  
7 the household work hard to support each other and depend on one another to  
8 meet their financial obligations. Mr. Rangel Velazquez also has a United  
9 States citizen adult step-daughter who lives with her husband in San  
10 Antonio, Texas.  
11  
12

13  
14 30.Petitioner Alfonso Rangel Velazquez does not have a criminal history of  
15 arrest, charges, or conviction in the United States or any other country.

16  
17 31.On December 6, 2021, Mr. Rangel Velazquez filed a Form I-360, Petition for  
18 Amerasian, Widower, or Special Immigrant, under the Violence Against  
19 Women Act. He additionally filed a Form I-485, Application to Register  
20 Permanent Residence or Adjust Status; a Form I-765, Application for  
21 Employment Authorization; and a Form I-131, Application for Travel  
22 Document.  
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1 32.Mr. Rangel Velazquez’s Form I-131 was subsequently approved and on  
2 December 17, 2024, Mr. Rangel Velazquez and his family traveled to  
3 Mexico City, Mexico to visit their family in that country. They returned to  
4 the United States on January 5, 2025.

5  
6 33.At that time, Mr. Rangel Velazquez presented his approved travel document  
7 at the Cross Border Express Otoy Mesa port of entry and was paroled into  
8 the United States. He was not arrested or detained by immigration  
9 authorities; instead, he was provided a Form I-94, Arrival/Departure Record,  
10 authorizing his parole in the United States through January 3, 2026.

11  
12 34.Petitioner Alfonso Rangel Velazquez’s Form I-360 self-petition was denied  
13 on February 21, 2025. However, he re-filed his Forms I-360, I-485, I-765,  
14 and I-131, on August 8, 2025. To date, Mr. Rangel Velazquez’s applications  
15 filed on August 8, 2025, remain pending with United States Citizenship and  
16 Immigration Services.  
17  
18

19 35.On January 20, 2025, President Donald J. Trump issued several executive  
20 actions relating to immigration, including “Protecting the American People  
21 Against Invasion,” an executive order setting out a series of interior  
22 immigration enforcement actions. *See* Exec. Order No. 14,159, 90 Fed. Reg.  
23 8443 (Jan. 29, 2025). This executive order instructs the DHS Secretary to  
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1 “take all appropriate action to enable” ICE, CBP, and USCIS to prioritize  
2 civil immigration enforcement procedures, including through mass  
3 detention. The Trump administration, through this and other actions, has  
4 outlined sweeping changes to immigration enforcement, establishing a  
5 formal framework for mass deportation.  
6

7 36. Since then, ICE has engaged in highly publicized arrests of individuals who  
8 presented no flight risk or danger. Many of those arrests were immediately  
9 preceded by “Call-In” notices from ICE.<sup>1</sup>  
10

11 37. On or about September 8, 2025, Petitioner Alfonso Rangel Velazquez  
12 received a “Call-In” notice instructing him to appear for an interview at the  
13 ICE San Diego Field Office on October 15, 2025, at 8:30 a.m. Mr. Rangel  
14 Velazquez reported to the appointment as instructed.  
15

16 38. During the appointment, the Department of Homeland Security issued Mr.  
17 Rangel Velazquez a Notice to Appear in Immigration Court. Therein, the  
18 DHS charged Mr. Rangel Velazquez with inadmissibility pursuant to 8  
19

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20  
21 <sup>1</sup> See *Emotional Glimpses of an Immigration Crackdown in a San Diego*  
22 *Courthouse* (Nov. 8, 2025),  
23 <https://www.nytimes.com/card/2025/11/08/us/immigration-ice-san-diego-courthou>  
24 [se.](#)  
25

1 U.S.C. §§ 1182(a)(6)(A)(i), as an alien present in the United States without  
2 inspection and admission or parole, and 1182(a)(7)(A)(i)(I), as an “arriving  
3 alien” who, at the time of application for admission, is not in possession of a  
4 valid entry document.

5  
6 39. Also during the appointment, Mr. Rangel Velazquez was taken into ICE  
7 custody and transferred to the Otay Mesa Detention Center, where he  
8 remains detained pending his removal proceedings.

9  
10 40. Mr. Rangel Velazquez was not provided any notice of his change in custody  
11 status or provided an opportunity to provide evidence as to why he should  
12 not be detained. Indeed, the reason for Mr. Rangel Velazquez’s detention  
13 remains unclear, particularly because his presence in the United States at the  
14 time of his detention remained authorized pursuant to his grant of advance  
15 parole and his Form I-360, Form I-485, and related applications filed on  
16 August 8, 2025, remained pending.

17  
18  
19 41. Mr. Rangel Velazquez’s next master calendar hearing is scheduled on  
20 December 31, 2025, at 1:00 p.m. before Immigration Judge Grande at 7488  
21 Calzada de la Fuente, San Diego, California.

22  
23 42. In addition to his pending Form I-360, Form I-485, and related applications,  
24 Mr. Rangel Velazquez is statutorily eligible for Cancellation of Removal  
25

1 pursuant to 8 U.S.C. § 1229b(b)(1). His application will be filed at his  
2 master calendar hearing on December 31, 2025.

3 43. Mr. Rangel Velazquez is suffering greatly in detention. He is depressed and  
4 is struggling to maintain his physical health which is already compromised  
5 due to high blood pressure. He is also suffering from the emotional toll of  
6 separation from his wife and daughter and his inability to fulfill his  
7 responsibilities to them.  
8

9  
10 44. Petitioner Alfonso Rangel Velazquez does not have a criminal history. He  
11 has extensive family and community ties in the United States as well as  
12 pending applications for immigration benefits. Thus, there is no reason to  
13 believe that he would pose a danger to the community or a flight risk if  
14 released from DHS custody.  
15

### 16 VIII. LEGAL FRAMEWORK

17  
18 45. The Immigration and Nationality Act (“INA”) permits the Department of  
19 Homeland Security (“DHS”) to grant parole to applicants for admission “on  
20 a case-by-case basis for urgent humanitarian reasons or significant public  
21 benefit.” 8 U.S.C. § 1182(d)(5)(A).  
22

23 46. “Advance parole” is a form of parole authorized prior to an individual’s  
24 temporary travel abroad. See 8 C.F.R. § 212.5(f). A person who returns to  
25

1 the United States under advance parole does so pursuant to DHS's prior  
2 adjudication and discretion. Advance parole is authorized under 8 U.S.C. §  
3 1182(d)(5).

4 47. Parole does not constitute an admission into the United States, but it does  
5 authorize physical presence and confers a liberty interest in remaining at  
6 liberty unless and until DHS determines, on an individualized basis, that  
7 circumstances have changed. *See* 8 U.S.C. § 1182(d)(5)(A).

8  
9  
10 48. All persons residing in the United States are protected by the Due Process  
11 Clause of the Fifth Amendment. *Zadvydas v. Davis*, 533 U.S. 678, 694  
12 (2001).

13  
14 49. The Due Process Clause of the Fifth Amendment provides that “[n]o person  
15 shall be ... deprived of life, liberty, or property, without due process of law.”  
16 U.S. Const. amend. V.

17  
18 50. Freedom from bodily restraint is at the core of the liberty protected by the  
19 Due Process Clause. *Zadvydas*, 533 U.S. at 690. This vital liberty interest is  
20 at stake when an individual is subject to detention by the federal  
21 government. *See id.*

22  
23 51. While the government may detain individuals who have been placed in  
24 immigration removal proceedings, immigration detention is still subject to  
25

1 review under the Due Process Clause. *See Zadvydas*, 533 U.S. at 694;  
2 *Hernandez v. Sessions*, 872 F.3d 976, 981 (9th Cir. 2017).

3 52. Individuals who have been paroled have a significant liberty interest under  
4 the Due Process Clause. *See Morrissey v. Brewer*, 408 U.S. 471, 482 (1972);  
5 *see also Sanchez v. LaRose*, No. 25-CV-2396-JES-MMP, at 5 (S.D. Cal.  
6 Sept. 26, 2025) (“When the government grants an alien parole into the  
7 country, it creates a liberty interest intimately tied to freedom from  
8 imprisonment.” (internal citation omitted)).  
9

10  
11 53. As such, revocation of a grant of parole must comport with Due Process.  
12 *See Morrissey*, 408 U.S. at 482.  
13

## 14 IX. CLAIMS FOR RELIEF

### 15 COUNT ONE

#### 16 Violation of the Fifth Amendment Due Process Clause

#### 17 Procedural Due Process

18  
19 54. Mr. Rangel Velazquez realleges and incorporates the allegations set forth  
20 above as if fully set out herein.  
21

22 55. The Fifth Amendment Due Process Clause forbids deprivation of liberty  
23 without notice and a meaningful opportunity to be heard. The Due Process  
24 Clause protects “all ‘persons’ within the United States, including  
25  
26

1 [non-citizens], whether their presence here is lawful, unlawful, temporary, or  
2 permanent.” *Zadvydas*, 533 U.S. at 693.

3 56. Respondents revoked Mr. Rangel Velazquez’s parole and took him into  
4 custody in an arbitrary manner, not based on any rational or individualized  
5 determination, and without notice or an opportunity to be heard prior to his  
6 detention.  
7

8 57. Under *Matthews v. Eldridge*, 42 U.S. 319, 335 (1976), courts evaluate  
9 procedural Due Process claims by balancing (1) the private interest affected;  
10 (2) the risk of erroneous deprivation of such an interest; and (3) the  
11 government’s interest.  
12

13 58. Applying this test, Mr. Rangel Velazquez’s private liberty interest in being  
14 free from detention is weighty, particularly given his lawful parole,  
15 long-term residence, family ties, and pending applications for immigration  
16 relief. *See Zadvydas*, 533 U.S. at 690. Additionally, he retains a significant  
17 liberty interest in his parole. *See Morrissey*, 408 U.S. at 482.  
18

19 59. Furthermore, the risk of erroneous deprivation of Mr. Rangel Velazquez’s  
20 liberty interest is great given that he did not receive any type of  
21 pre-deprivation hearing. As a result, neither he nor the government had an  
22 opportunity to determine whether there was a valid basis for his detention or  
23  
24  
25

1 the revocation of his parole. *See Pinchi v. Noem*, No. 5:25-cv-05632-PCP at  
2 8 (N.D. Cal. July 24, 2025).

3 60.The government can claim no interest in revoking Mr. Rangel Velazquez’s  
4 parole and detaining him where there are no changed circumstances since his  
5 parole that would warrant either action. *See, e.g., id.* (in the re-detention  
6 context, finding no interest in re-detention where there were no changed  
7 circumstances going to flight risk or danger that warranted it).  
8

9  
10 61.Because Mr. Rangel Velazquez was not afforded a pre-detention hearing to  
11 determine whether he posed a danger to the community or flight risk or  
12 whether his parole should be revoked, his detention and revocation of his  
13 parole violate procedural Due Process.  
14

15 **COUNT TWO**

16 **Violation of the Fifth Amendment Due Process Clause**

17 **Substantive Due Process**

18  
19 62.Mr. Rangel Velazquez realleges and incorporates the allegations set forth  
20 above as if fully set out herein.  
21

22 63.All persons residing in the United States are protected by the Due Process  
23 Clause of the Fifth Amendment. *Zadvydas*, 533 U.S. at 690.  
24

1 64. Freedom from bodily restraint is at the core of the liberty protected by the  
2 Due Process Clause. *Id.* This liberty interest is at stake when an individual is  
3 subject to detention by the federal government. *See id.*

4 65. Immigration detention must serve a legitimate purpose—such as ensuring  
5 appearance or protecting the community—and must be reasonably related to,  
6 and not excessive in relation to, that purpose. *See id.*

7  
8 66. Thus, immigration detention that does not serve legitimate government  
9 purposes of preventing flight or mitigating danger violates substantive Due  
10 Process. *See id.*

11  
12 67. Immigration detention facilitated by blanket government policies without  
13 regard to whether an individual is a flight risk or a danger to the community  
14 violates the Due Process Clause. *See id.*; *see also United States v. Trimble*,  
15 487 F.3d 752, 757 (9th Cir. 2007) (stating that due process requires that  
16 government action be rational and non-arbitrary).  
17  
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19 68. Mr. Rangel Velazquez does not present a danger to the community or a flight  
20 risk. He does not have a criminal history of arrest, charges, or convictions,  
21 in the United States or any other country. He has strong family ties in this  
22 country, a long employment history, and pending applications for  
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1 immigration benefits. His detention does not serve any legitimate  
2 government purpose.

3 69.Mr. Rangel Velazquez's detention violates substantive Due Process because  
4 it is not rationally related to any legitimate government purpose.

5  
6 **X. PRAYER FOR RELIEF**

7 Petitioner prays that this Court grant the following relief:

- 8  
9  
10 1. Assume jurisdiction over this matter;
- 11 2. Issue an Order to Show Cause ordering Respondents to show cause  
12 why this Petition should not be granted within three days;
- 13 3. Declare that Petitioner's detention without an individualized  
14 determination violates the Due Process Clause of the Fifth  
15 Amendment;
- 16 4. Declare that revocation of Petitioner's parole without an  
17 individualized determination violates the Due Process Clause of the  
18 Fifth Amendment;
- 19 5. Grant Petitioner a writ of habeas corpus directing the Respondents to  
20 immediately release him from custody, under reasonable conditions of  
21 supervision;  
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- 1           6. In the alternative, order a constitutionally adequate bond hearing in
- 2           which Respondents bear the burden of justifying Petitioner's
- 3           continued detention by clear and convincing evidence;
- 4           7. Order Respondents to refrain from transferring Petitioner out of the
- 5           jurisdiction of this court during the pendency of these proceedings and
- 6           while the Petitioner remains in Respondents' custody;
- 7           8. Award attorneys' fees and costs to Petitioner under the Equal Access
- 8           to Justice Act, and on any other basis justified by law; and
- 9           10           9. Grant any other and further relief which this Court deems just and
- 10           proper.

11           I affirm, under penalty of perjury, that the foregoing is true and correct.

12           Dated: December 8, 2025

13           Signature: /s/ Robin M. Nagele  
14           By: Robin M. Nagele  
15           Attorney for Petitioner

**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

1 I, Robin M. Nagele, attorney for Petitioner, declare that I am acting on  
2 behalf of Alfonso Rangel Velazquez, the person for whose relief the foregoing  
3 Petition for Writ of Habeas Corpus is intended. I have discussed with Petitioner  
4 the events described in the Petition. Based on those discussions, I verify that  
5 the factual statements contained in the attached Petition for Writ of Habeas Corpus are  
6 true and correct to the best of my knowledge, information, and belief.  
7  
8  
9

10 Executed on December 8, 2025, in Vista, California.

11  
12 Respectfully submitted,

13  
14 /s/ Robin M. Nagele  
15 Robin M. Nagele  
16 *Attorney for Petitioner*  
17  
18  
19  
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21  
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25  
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