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9 UNITED STATES DISTRICT COURT
10
11 FOR THE DISTRICT OF ARIZONA
12

13 Reza AMIRI,

14 Petitioner,

15 v.

16 Chris HOWARD, Acting Warden, Eloy Detention
17 Center;

18 John CANTU, Field Office Director of Phoenix
19 Office of Detention and Removal, U.S. Immigrations
20 and Customs Enforcement; U.S. Department of
21 Homeland Security;

22 Todd M. LYONS, Acting Director, Immigration and
23 Customs Enforcement, U.S. Department of Homeland
24 Security;

25 Kristi NOEM, in her Official Capacity, Secretary,
26 U.S. Department of Homeland Security; and

27 Pamela BONDI, in her Official Capacity, Attorney
28 General of the United States;

Respondents.

Case No.



**PETITION FOR WRIT OF
HABEAS CORPUS AND
COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF**

Challenge to Unlawful Detention
Under 28 U.S.C. § 2241

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INTRODUCTION

1. Petitioner Reza Amiri (“Mr. Amiri”) remains in ICE custody in Arizona despite withholding of his removal being ordered on June 3, 2024 based on findings by an Immigration Judge (IJ) that it’s “more likely than not” his life or freedom would be threatened due to a protected ground if returned to his home country of Afghanistan. On July 1, 2024, Immigration and Customs Enforcement (ICE) released Mr. Amiri on an order of supervision (*see* Exhibit A), but has now no-notice re-detained Mr. Amiri and refuses to release him, claiming that it is looking for alternative countries of removal despite knowing that he lacks citizenship in or a connection to any other country. Mr. Amiri’s continued detention is arbitrary and unlawful, and he requests that this Court order his immediate release from ICE custody.

2. Mr. Amiri is detained pursuant to 8 U.S.C. § 1231, which governs the detention of non-citizens with a final order of removal that has been withheld or deferred by an IJ due to a substantial risk of persecution or torture in their home country. 8 U.S.C. § 1231(a)(1)(B)(i). Mr. Amiri’s removal order and accompanying relief grant became final when both parties waived appeal on June 3, 2024. 8 C.F.R. § 1241.1.

3. Mr. Amiri’s continued detention violates 8 C.F.R. § 241.4 as well as Petitioner’s due process under both the Fifth Amendment and the Administrative Procedure Act under 8 U.S.C. § 1231(a)(6), as interpreted by the Supreme Court in *Zadvydas v. Davis*, 533 U.S. 678 (2001), because his removal is not reasonably foreseeable. He cannot be deported to his home country of Afghanistan because he was granted protection in the form of withholding of removal with respect to that country. 8 C.F.R. § 208.16. ICE’s half-

1 hearted attempts to remove Mr. Amiri to a random collection of unspecified alternative
2 countries are speculative and futile.

3 **JURISDICTION & VENUE**
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5 4. This Court has jurisdiction under 28 U.S.C. §§ 2241 *et seq.*; the Declaratory
6 Judgment Act, 28 U.S.C. §§ 2201 *et seq.*; the All Writs Act, 28 U.S.C. § 1651; and the
7 Fifth Amendment to the United States Constitution.
8

9 5. Federal district courts have jurisdiction to hear habeas claims by non-
10 citizens challenging the lawfulness of their detention. *See, e.g., Zadvydas*, 533 U.S. at 687.
11

12 6. Federal courts also have federal question jurisdiction, through the APA, to
13 “hold unlawful and set aside agency action” that is “arbitrary, capricious, an abuse of
14 discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). APA claims
15 are cognizable on habeas. 5 U.S.C. § 703 (providing that judicial review of agency action
16 under the APA may proceed by “any applicable form of legal action, including actions for
17 declaratory judgments or writs of prohibitory or mandatory injunction or habeas corpus”).
18 The APA affords a right of review to a person who is “adversely affected or aggrieved by
19 agency action.” 5 U.S.C. § 702. Respondents’ continued detention of Petitioner up to and
20 past the 90-day removal period has adversely and severely affected Petitioner’s liberty and
21 freedom.
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24 7. Venue is proper in this district and division pursuant to 28 U.S.C. §
25 2241(c)(3) and 28 U.S.C. § 1391(b)(2) and (e)(1) because Petitioner is detained within this
26 district at Eloy Detention Center. Furthermore, a substantial part of the events or omissions
27 giving rise to this action occurred and continue to occur at ICE’s Phoenix Field Office in
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1 Phoenix, Arizona, within this division.

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3 **PARTIES**

4 8. Petitioner Reza Amiri is a native and citizen of Afghanistan who was granted
5 withholding of removal on June 3, 2024. He is currently detained at the Eloy Detention
6 Center.

7 9. Respondent Chris Howard is, upon information and belief, the Acting
8 Warden of the Eloy Detention Center, where Mr. Amiri is being detained. He is Mr.
9 Amiri's immediate legal custodian and thus a proper respondent in this matter. *See*
10 *Rumsfeld v. Padilla*, 542 U.S. 426, 435 (2004).
11

12 10. Respondent John Cantu was the Field Office Director of the ICE
13 Enforcement and Removal Operations (ERO) Phoenix Field Office and was the federal
14 agent charged with overseeing all ICE detention centers in Arizona, including the Eloy
15 Detention Center. He was dismissed from this role on October 24, 2025. No replacement
16 for Mr. Cantu has been publicly identified. Mr. Cantu or his successor is responsible for
17 Mr. Amiri's detention, and thus a legal custodian of Mr. Amiri.
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19 11. Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and
20 Customs Enforcement (ICE) and is the federal agent charged with overseeing all ICE
21 operations. He is sued in his official capacity.

22 12. Respondents Pamela Jo Bondi and Kristi Noem are, respectively, the
23 Attorney General of the United States and the Secretary of Homeland Security. As such,
24 they are responsible for maintaining the immigration detention system. They are thus the
25 ultimate legal custodians of Mr. Amiri.
26

27 **LEGAL FRAMEWORK**

1 **I. WITHHOLDING OF REMOVAL**

2 13. Non-citizens in immigration removal proceedings can seek three main
3 forms of relief based on their fear of returning to their home country: asylum, withholding
4 of removal, and CAT relief. Non-citizens may be ineligible for asylum for several reasons,
5 including failure to apply within one year of entering the United States. *See* 8 U.S.C. §
6 1158(a)(2). There are fewer restrictions on eligibility for withholding of removal, *id.* §
7 1231(b)(3)(B)(iii), and no restrictions on eligibility for CAT deferral of removal. 8 C.F.R.
8 § 1208.16.
9

10 14. To be granted withholding of removal relief, a non-citizen must show that
11 it is “more likely than not” that his “life or freedom would be threatened” because of race,
12 religion, nationality, membership in a particular social group, or political opinion if they
13 return to their homeland. INA § 241(b)(3); 8 C.F.R. § 1208.16.
14
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16 15. When an IJ grants a non-citizen withholding relief, the IJ issues a removal
17 order and simultaneously withholds that order with respect to the country or countries for
18 which the non-citizen demonstrated a sufficient risk of persecution or torture. *See Johnson*
19 *v. Guzman Chavez*, 141 S. Ct. 2271, 2283 (2021). Once withholding relief is granted, either
20 party has the right to appeal that decision to the BIA within 30 days. *See* 8 C.F.R. §
21 1003.38(b). If both parties waive appeal or neither party appeals within the 30-day period,
22 the withholding grant and the accompanying removal order become administratively final.
23
24 *See id.* § 1241.1.
25

26 16. When a non-citizen has a final withholding grant, they cannot be removed
27 to the country or countries for which they demonstrated a sufficient likelihood of
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1 persecution or torture. *See* 8 U.S.C. § 1231(b)(3)(A); 8 C.F.R. § 1208.17(b)(2). While ICE
2 is authorized to remove non-citizens who were granted withholding to alternative countries,
3 *see* 8 U.S.C. § 1231(b); 8 C.F.R. § 1208.16(f), the removal statute specifies restrictive
4 criteria for identifying appropriate countries. Non-citizens can be removed, for instance, to
5 the country “of which the [non-citizen] is a citizen, subject, or national,” the country “in
6 which the [non-citizen] was born,” or the country “in which the [non-citizen] resided”
7 immediately before entering the United States. 8 U.S.C. § 1231(b)(2)(D)-(E).

9 17. If ICE identifies an appropriate alternative country of removal, ICE must
10 undergo further proceedings in immigration court to effectuate removal to that country.
11 Pursuant to the preliminary injunction in *DVD v. DHS*, 1:25-cv-10676, (D. Mass.) (March
12 23, 2025), [P]rior to removing any [noncitizen] to a third country, i.e., any country not
13 explicitly provided for on the [noncitizen]’s order of removal, Defendants (DHS) must: (1)
14 provide written notice to the [noncitizen]—and the [noncitizen]’s immigration counsel, if
15 any—of the third country to which the [noncitizen] may be removed, in a language the
16 [noncitizen] can understand; (2) provide meaningful opportunity for the [noncitizen] to
17 raise a fear of return for eligibility for CAT protections; (3) move to reopen the proceedings
18 if the [noncitizen] demonstrates “reasonable fear”; and (4) if the [noncitizen] is not found
19 to have demonstrated “reasonable fear,” provide meaningful opportunity, and a minimum
20 of 15 days, for that [noncitizen] to seek to move to reopen immigration proceedings to
21 challenge the potential third-country removal. *See also Jama v. ICE*, 543 U.S. 335, 348
22 (2005) (“If [non-citizens] would face persecution or other mistreatment in the country
23 designated under § 1231(b)(2), they have a number of available remedies: asylum,
24 § 1158(b)(1); withholding of removal, § 1231(b)(3)(A); [and] relief under an international
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1 agreement prohibiting torture, *see* 8 CFR §§ 208.16(c)(4), 208.17(a) (2004) . . .”); *Romero*
2 *v. Evans*, 280 F. Supp. 3d 835, 848 n.24 (E.D. Va. 2017) (“DHS could not immediately
3 remove petitioners to a third country, as DHS would first need to give petitioners notice and
4 the opportunity to raise any reasonable fear claims.”), *rev’d on other grounds, Guzman*
5 *Chavez*, 141 S. Ct. 2271.

6
7 18. As a result of these restrictions and procedures, “only 1.6% of noncitizens
8 granted withholding-only relief were actually removed to an alternative country” in FY
9 2017. *Johnson v. Guzman Chavez*, 141 S. Ct. at 2295 (Breyer, J., dissenting). An analysis
10 by Amica Center of updated statistics provided by ICE for FY 2019 through FY 2020
11 reveals that this percentage was at most 3.3% during that period, although it was likely
12 even lower.¹

13 14 15 STATEMENT OF FACTS

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17 19. Mr. Amiri initially came into immigration custody on or about February 4,
18 2024 while crossing the U.S.-Mexico border to seek asylum.

19
20 20. On June 3, 2024, Mr. Amiri was ordered removed but granted withholding
21 of his removal by the Eloy Immigration Court. **Exhibit B**. The Court found that it is more
22 likely than not that Mr. Amiri’s life or freedom would be threatened because of race,
23 religion, nationality, membership in a particular social group, or political opinion if
24 returned to Afghanistan.

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27 ¹ *See Exhibit C, Continued Detention of Noncitizens Who Win Immigration Relief, Amica Center,*
28 <https://amicacenter.org/app/uploads/2024/07/Continued-Detention-Brief-Amica-Version.pdf#:~:text=But%20the%20noncitizen%20must%20have%20some%20tangible,or%20CAT%20relief—between%201.6%20and%203.3%20percent>.

1 26. Section 241.4 imposes mandatory procedures for revoking release, and the
2 DHS has failed to follow any of them.

3 27. Under 8 C.F.R. § 241.4(l) (Revocation of Release), DHS may revoke an
4 OSUP only after: (1) providing the individual written notice of the reasons for revocation,
5 (2) having an immigration officer document those reasons, (3) giving the individual a
6 meaningful opportunity to respond, and (4) conducting prompt custody reviews under §
7 241.4(h)–(k).
8

9 28. These are mandatory, binding regulations, not aspirational guidelines.
10 Courts consistently hold that DHS’s failure to follow these procedures invalidates post-
11 order detention, because § 241.4 defines the scope of the agency’s authority to detain under
12 8 U.S.C. § 1231(a).
13

14 29. DHS has violated every requirement. Petitioner received no written notice,
15 no statement of reasons, no chance to contest the revocation, and no contemporaneous or
16 subsequent custody interview.
17

18 30. The DHS’s noncompliance with § 241.4 also violates the Fifth
19 Amendment’s due process clause.
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21 31. Even aside from § 241.4, DHS’s conduct violates the Fifth Amendment. A
22 person released under an OSUP retains a constitutionally protected liberty interest in
23 remaining in the community. Revocation of release and re-detention constitute a significant
24 deprivation of liberty requiring notice, a statement of reasons, an opportunity to respond,
25 and a neutral decisionmaker.
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1 32. DHS provided none of these. Instead, ICE re-detained Petitioner summarily,
2 without cause, and without any procedural safeguard. This type of unexplained, arbitrary
3 re-detention is antithetical to due process and constitutes an independent constitutional
4 violation, irrespective of the length of detention or *Zadvydas*.
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6 33. DHS's failure to follow its own mandatory regulations is arbitrary and
7 capricious under the APA.
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9 34. The Administrative Procedure Act requires courts to set aside agency action
10 that is: arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with
11 law (5 U.S.C. § 706(2)(A)), or without observance of procedure required by law (5 U.S.C.
12 § 706(2)(D)).
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14 35. DHS's conduct meets both defects: It ignored mandatory procedures
15 governing revocation of release; it offered no explanation for its action; it failed to conduct
16 any custody review interviews; and it provided no evidence of efforts to effectuate removal.
17

18 36. When an agency fails to follow its own binding regulations, courts
19 consistently deem the action *per se* arbitrary and capricious. Thus, even apart from
20 constitutional concerns or *Zadvydas*, DHS's actions violate the APA.
21

22 **II. GROUND TWO: MR. AMIRI'S CONTINUED DETENTION IN**
23 **IMMIGRATION CUSTODY VIOLATES THE DUE PROCESS CLAUSE OF**
24 **THE FIFTH AMENDMENT TO THE U.S. CONSTITUTION BECAUSE**
25 **THERE IS NO SIGNIFICANT LIKELIHOOD THAT HE WILL BE**
26 **REMOVED IN THE REASONABLY FORESEEABLE FUTURE.**

27 37. Mr. Amiri will very likely *never* be deported from the United States, let
28 alone in the reasonably foreseeable future. He cannot be deported to his home country of
Afghanistan because he has a final grant of withholding of removal. *See* 8 C.F.R. § 1208.16.

1 38. Furthermore, it is exceedingly unlikely that ICE will identify an alternative
2 country to which it can remove Mr. Amiri. ICE only managed to remove to third countries
3 approximately three percent of non-citizens granted withholding and CAT relief in FY
4 2019 and 2020, *see Ex. C*, and a significant increase in ICE's third country removals is
5 highly doubtful without a substantial change in diplomatic relationships between the
6 United States and other countries.²
7

8 39. Mr. Amiri's present detention is purportedly authorized under 8 U.S.C. §
9 1231.
10

11 40. Detention of aliens who have been ordered removed is mandatory during
12 the so-called 90-day "removal period." 8 U.S.C. § 1231(a)(1)(A).
13

14 41. The beginning of the removal period started on June 3, 2024, when Mr.
15 Amiri's order of removal became administratively final. 8 U.S.C. § 1231(a)(1)(B)(i).
16 Therefore, the 90-day removal period ran until September 1, 2024.
17

18 42. After the 90-day period runs, if an individual is not removed, they are placed
19 under supervision pursuant to the regulations. 8 U.S.C. § 1231(a)(3).
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21 43. Despite the mandatory nature of the removal period, Mr. Amiri was released
22 on July 1, 2024 and placed on an order of supervision.
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26 ² Foreign countries do not accept the deportation of random non-citizens who lack any connection to their territory.
27 According to a 2019 DHS report on ICE deportation procedures, "foreign governments do not issue travel
28 documents without confirming the identity and citizenship of the [non-citizen]" and "with limited exceptions,
require a passport or temporary travel permit to accept their nationals back into the country." DHS Office of the
Inspector General, *ICE Faces Barriers in Timely Repatriation of Detained Aliens* (March 11, 2019), at 8
<https://www.oig.dhs.gov/sites/default/files/assets/2019-03/OIG-19-28-Mar19.pdf>.

1 44. Given this fact and the additional fact that ICE has had over a year and a
2 half to effectuate Mr. Amiri's removal and determine a third country which would accept
3 him, it remains unclear how one is to believe that ICE will be able to remove Mr. Amiri.
4 Mr. Amiri is not a citizen of, has never lived in, and has no connection to *any* country
5 besides his home country.

6 45. Even in the highly unlikely scenario that an alternative country notifies ICE
7 of its willingness to accept the deportation of Mr. Amiri, ICE would still be required to
8 obtain travel documents and afford him a Reasonable Fear Interview (RFI) at which he
9 would have the opportunity to articulate a fear of return to the country willing to accept
10 him. *See* 8 C.F.R. § 241.8(e). If an Asylum Officer (AO) were to find that Mr. Amiri
11 demonstrated a reasonable possibility of persecution or torture at the RFI, or an IJ
12 subsequently vacated a negative finding by the AO, he would enter withholding-only
13 proceedings before an IJ in which he would again seek to demonstrate his eligibility for
14 withholding or CAT relief with respect to that country, thereby restarting the process that
15 took several months to complete the first time. *Id.*

16 46. Thus Mr. Amiri's continued detention in ICE custody violates the Due
17 Process Clause of the Fifth Amendment as described in *Zadvydas*.

18 47. Mr. Amiri's his removal is not reasonably foreseeable because 1) he cannot
19 be deported to his home country due to his withholding grant; 2) ICE has historically
20 managed to remove only a tiny fraction of non-citizens granted withholding or CAT to
21 alternative countries;
22 3) any countries to which requests may still be pending have no logical reason to accept Mr.
23 Amiri's deportation and have provided no timeline under which they might decide; and 4)
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1 deporting Mr. Amiri to those alternative countries would require additional, lengthy
2 proceedings. *See Hassoun v. Sessions*, No. 18-cv-586-FPG, 2019 WL 78984, at *5
3 (W.D.N.Y. Jan. 2, 2019) (finding removal not reasonably foreseeable where several
4 countries had declined to issue travel documents and several others had provided no
5 response or timeline for response); *Kacanic v. Elwood*, No. 02-cv-8019, 2002 WL
6 31520362, at *5 (E.D. Pa. Nov. 8, 2002) (finding removal not reasonably foreseeable where
7 the country of origin had “been in possession of all the information [ICE] is capable of
8 providing to it” but had “never stated that the Petitioner is likely to be granted travel papers”
9 and was “unable to tell the [ICE] when a decision will be reached”).

10
11 48. For the reasons stated above, Mr. Amiri has clearly met any burden of proof
12 that this Court may place on him. Unlike *Zadvydas* and the vast majority of its progeny,
13 which analyzed whether ICE will foreseeably remove non-citizens to their home country
14 or country of citizenship, *see, e.g., Zadvydas*, 533 U.S. at 684-85, the question here is
15 whether ICE will be able to deport Mr. Amiri to random third countries to which he has no
16 connection whatsoever. The answer to that question has been no since June 3, 2024 when
17 Mr. Amiri’s relief grant became final, and ICE has continuously failed to effectuate a third-
18 country removal since then.
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22 **A. *This Court should order Mr. Amiri’s immediate release.***

23 49. Because Mr. Amiri’s removal is not reasonably foreseeable, *Zadvydas*
24 requires that he be immediately released. *See* 533 U.S. at 700-01 (describing release
25 as an appropriate remedy); 8 U.S.C. § 1231(a)(6) (authorizing release “subject to . . . terms
26 of supervision”). To order his immediate release, this Court need only determine that Mr.
27 Amiri’s re-detention was in violation of 28 U.S.C. § 2241. Additionally, his removal is not
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1 reasonably foreseeable under *Zadvydas*. This Court does not need to analyze whether he
2 poses a danger to the community or a flight risk. *See* 533 U.S. at 699-700 (“[I]f removal is
3 not reasonably foreseeable; the court should hold continued detention unreasonable and no
4 longer authorized by statute.”). Although, we contend that he does not.

5
6 50. *Zadvydas* explicitly held that flight risk is already baked into the reasonable
7 foreseeability analysis, *see id.* at 690 (observing that the “justification . . . [of] preventing
8 flight . .
9 . is weak or nonexistent where removal seems a remote possibility at best”), and that
10 dangerousness cannot unilaterally justify indefinite civil detention barring “special
11 circumstances,” which may include the non-citizen being a “suspected terrorist[]” but do
12 not include the non-citizen’s “removable status itself.” *Id.* at 691. *See also Kansas v.*
13 *Hendricks*, 521 U.S. 346, 358 (1997) (“A finding of dangerousness, standing alone, is
14 ordinarily not a sufficient ground upon which to justify indefinite involuntary [civil
15 detention].”). With respect to Mr. Amiri’s detention, ICE has not invoked the regulations
16 governing these “special circumstances” determinations. *See* 8
17 C.F.R. § 241.14.
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20 51. Additionally, this Court or ICE is free to impose conditions on release to
21 mitigate any potential concerns regarding flight risk or danger (as ICE has done in the past
22 when they released Mr. Amiri on an order of supervision in July 2024). *See Zadvydas*, 533
23 U.S. at 700 (“[T]he [non- citizen]’s release may and should be conditioned on any of the
24 various forms of supervised release that are appropriate in the circumstances.”).
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27 **PRAYER FOR RELIEF**
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VERIFICATION PURSUANT TO 28 U.S.C. 2242

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

Executed on this December 19, 2025, in Phoenix, AZ.

/s/ Spencer C. Lee
Spencer C. Lee
Attorney for Reza Amiri

CERTIFICATE OF SERVICE

1
2 This is to certify that on December 19, 2025, the foregoing PETITION FOR WRIT OF
3 HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF
4 was served by certified mail, on:

5 Chris Howard,
6 Acting Warden, Eloy Detention Center,
7 Office of the General Counsel
8 U.S. Department of Homeland Security
9 245 Murray Lane, SW
10 Mail Stop 0485
11 Washington, DC 20528-0485

12 John Cantu,
13 Field Office Director of Phoenix Office of Detention and Removal, U.S. Immigrations and
14 Customs Enforcement
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26 Kristi Noem
27 Secretary, Department of Homeland Security
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