UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

Marco JEREZ-LOPEZ Petitioner, v. 1.. KRISTI NOEM, in her official capacity as Secretary, U.S. Department of Homeland Security; 2.. Pamela BONDI, in her official capacity as U.S. Attorney General Executive Office for Immigration Review; 3. Robert CERNA, in his official capacity as Field Office Director of Enforcement and Removal Operations, ICE Dallas Field Office, Immigration and Customs Enforcement; 4. Scarlett GRANT, in her official capacity as Warden of Cimarron Correctional Facility Respondents.	)	Case No. _______________ Immigration File No. A

INTRODUCTION

1. Petitioner, Marco Jerez-Lopez, ("Petitioner"), by and through his undersigned counsel, hereby petitions this Court for a writ of habeas corpus to review the lawfulness of his detention. Petitioner is currently being held in detention by Immigration and Customs Enforcement ("ICE"), a part of the Department of Homeland Security ("DHS"). Petitioner challenges his indefinite and unlawful detention, which is the result of a new and erroneous interpretation of the Immigration and Nationality Act ("INA") by the

U.S. Department of Homeland Security and the U.S. Department of Justice ("DOJ"). Petitioner has been physically present in the United States since 2008. Petitioner has been held without the possibility of bond due to the misapplication of 8 U.S.C. § 1225(b)(2)(A) and the Board of Immigration Appeals' ("BIA") recent decision in *Matter of Yajure Hurtado*, 26 I&N Dec. 216 (BIA 2025). Petitioner and countless of similarly situated individuals have been stripped of their ability for bond hearings guaranteed by 8 U.S.C. § 1226. As a result, Petitioner remains detained at the Cimarron Correctional Facility in Cushing, Oklahoma, without judicial oversight, in violation of both the INA and the Due Process Clause of the Fifth Amendment.

2. Petitioner is in the physical custody of Respondents at the Cimarron Correctional Facility in Cushing, Oklahoma. He now faces unlawful detention because DHS and the Executive Office for Immigration Review ("EOIR") have concluded Petitioner is subject to mandatory detention.

3. Petitioner is charged with, *inter alia*, entering the United States without admission or inspection. *See* 8 U.S.C. § 1182(a)(6)(A)(i).

4. Based on this allegation in Petitioner's removal proceedings, DHS denied Petitioner release from immigration custody, consistent with a new DHS policy issued on July 8, 2025, instructing all ICE employees to consider anyone inadmissible under § 1182(a)(6)(A)(i), i.e., those who entered the United States without admission or inspection, subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

5. On September 5, 2025, the BIA issued a precedent decision, binding on all immigration judges, holding that an immigration judge has no authority to consider bond requests for any person who entered the United States without admission. *See Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). The BIA determined that such individuals are subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

6. Petitioner's detention on this basis violates the plain language of the Immigration and Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner who previously entered and are now residing in the United States. Instead, such individuals are subject to a different statute, § 1226(a), that allows for release on conditional parole or bond. That statute expressly applies to people who, like Petitioner, are charged as inadmissible for having entered the United States without inspection.

7. Respondents' new legal interpretation is plainly contrary to the statutory framework and contrary to decades of agency practice applying § 1226(a) to people like Petitioner.

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

JURISDICTION

9. Petitioner is in the physical custody of Respondents. Petitioner is detained at the Cimarron Correctional Facility in Cushing, Oklahoma.

10. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause).

11. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.

12. In *Demore v. Kim*, 538 U.S. 510 (2003), the Supreme Court held that habeas corpus may be used to bring a constitutional challenge to pre-removal order detention.

VENUE

13. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky* , 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Western District of Oklahoma, the judicial district in which Petitioner currently is detained.

14. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the United States District Court for the Western District of Oklahoma.

REQUIREMENTS OF 28 U.S.C. § 2243

15. The Court must grant the petition for writ of habeas corpus or order Respondents to show cause "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, Respondents must file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

16. Habeas corpus is "perhaps the most important writ known to the constitutional law… affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). "The application for the writ usurps the attention and displaces the calendar of the judge or justice who

entertains it and receives prompt action from him within the four corners of the application." *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

PARTIES

17. Petitioner, Marco Jerez-Lopez, is alleged to be a citizen of Guatemala who has been in immigration detention since on or about December 31, 2025. After detaining Petitioner, ICE did not set bond and Petitioner is unable to obtain review of his custody by an immigration judge, pursuant to the BIA's decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

18. Respondent, Kristi Noem, is the Secretary of the Department of Homeland Security. Respondent Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act (INA), and oversees ICE, who is responsible for Petitioner's detention. Respondent Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

19. Respondent, Pamela Bondi, is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, she has the authority to adjudicate removal cases and to oversee EOIR, which administers the immigration courts and the BIA. Respondent Bondi is a legal custodian of Petitioner.

20. Respondent, Robert Cerna, is sued in his official capacity as the Acting Director of the Dallas Field Office and Oklahoma City Sub-Office of U.S. Immigration and Customs Enforcement. Respondent Cerna is a legal custodian of Petitioner and has authority to release him.

21. Respondent, Dr. Scarlet Grant, is the Warden of Cimarron Correctional Facility, and she has immediate physical custody of Petitioner pursuant to the facility's contract with U.S. Immigration and Customs Enforcement. Respondent Grant is a legal custodian of Petitioner.

STATEMENT OF FACTS

22. Petitioner has resided continuously in the United States since 2008 and currently lives in Oklahoma City, Oklahoma.

23. On or about December 31, 2025, Petitioner was detained by ICE on his way to work. Petitioner was taken into custody and is presently detained at the Cimarron Correctional Facility in Cushing, Oklahoma.

24. Petitioner is currently in removal proceedings before the Aurora, Colorado Immigration Court pursuant to 8 U.S.C. § 1229a. ICE has charged Petitioner with, *inter alia*, being inadmissible under 8 U.S.C. §1182(a)(6)(A)(i) as someone who entered the United States without inspection.

25. Petitioner has resided in the United States for more than fifteen (15) years. Petitioner is alleged to have entered the United States in 2008.

26. Without intervention from this Court, Petitioner faces the prospect of indefinite detention lasting months or even years, separated from his family and community.

LEGAL FRAMEWORK

27. The INA prescribes three basic forms of detention for the vast majority of noncitizens in removal proceedings.

28. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal proceedings before an Immigration Judge. *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are generally entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, *see* 8 U.S.C. § 1226(c).

29. Second, the INA provides for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission referenced in § 1225(b)(2).

30. Last, the INA provides for detention of noncitizens who have been ordered removed, including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b).

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

32. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104--208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025).

33. Following the enactment of the IIRIRA, EOIR drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225. Instead, they were considered detained under § 1226(a). *See* Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

34. Thus, in the decades that followed, most people who entered without inspection and were placed in standard removal proceedings received bond hearings, unless their criminal history rendered them ineligible pursuant to 8 U.S.C. § 1226(c). This practice was consistent with many more decades of prior practice, in which noncitizens who were not deemed "arriving" were entitled to a custody hearing before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply "restates" the detention authority previously found at § 1252(a)).

35. On July 8, 2025, ICE, "in coordination with" the DOJ, announced a new policy that rejected well-established understanding of the statutory framework and reversed decades of practice.

36. The new policy, entitled "Interim Guidance Regarding Detention Authority for Applicants for Admission,"[1] claims that all persons who entered the United States without inspection shall now be subject to mandatory detention provision under § 1225(b)(2)(A). The policy applies regardless of when a person is apprehended and affects those who have resided in the United States for months, years, and even decades.

37. On September 5, 2025, the BIA adopted this same position in a published decision, *Matter of Yajure Hurtado*. There, the BIA held that all noncitizens who entered the United States without admission or parole are subject to detention under § 1225(b)(2)(A) and are ineligible for bond hearings before immigration judges.

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[1] Available at https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission.

38. Since Respondents adopted their new policies, dozens of federal courts have rejected this new interpretation of the INA's detention authorities. Courts have likewise rejected *Matter of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

39. Prior to ICE or the BIA introducing these nationwide policies, IJs in the Tacoma, Washington Immigration Court stopped providing bond hearings for persons who entered the United States without inspection and who have since resided in the country. There, the U.S. District Court in the Western District of Washington found that such a reading of the INA is likely unlawful and that § 1226(a), not § 1225(b), applies to noncitizens who are not apprehended upon arrival to the United States. *Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025).

40. Subsequently, courts have adopted the same reading of the INA's detention authorities and rejected ICE and EOIR's new interpretation, including some judges from this Court and our sister courts in the Tenth Circuit. *See Cruz-Hernandez v. Noem,* No. 25-cv-1378 (W.D. Okla. Jan. 2 2026), *Escarcega v. Olson*, No. 25-cv-1129 (W.D. Okla. Oct. 28, 2025); *Salinas Gallardo v. Olson*, No. 25-cv-1090 (W.D. Okla. Oct. 28, 2025) (holding § 1226(a) governs detention of non-arriving aliens arrested in the interior), *Garcia Cortes v. Noem*, No, 1:25-cv-02677, 2025 WL 2652880 (D. Colo. Sept. 16, 2025); *Salazar v. Dedos*, No. 1:25-cv-00835, 2025 WL 2676729 (D.N.M. Sept. 17, 2025); and *Gamez Lira v. Noem*, No. 1:25-cv-00855 (D.N.M. Sept. 24, 2025).

41. Other District Courts across the country have also rejected ICE's erroneous interpretation. *See*, e.g., *Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*, No. CV 25-11613-BEM, --- F. Supp. 3d ----,

2025 WL 2084238 (D. Mass. July 24, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), report and recommendation adopted, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263 (N.D. Cal. Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), --- F. Supp. 3d ----, 2025 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v. Raycraft*, No. 2:25-cv-12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass. Sept. 9, 2025); *see also, e.g., Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566, at *2 (D. Neb. Sept. 3, 2025) (noting that "[t]he Court tends to agree" that § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL 2402271 at *3 (D. Neb. Aug. 19, 2025)

(same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224 at *2 (D. Neb. Aug. 14, 2025)(same).

42. On December 18, 2025, the United States District Court for the Central District of California granted a nationwide class action in *Maldonado Bautista v. Noem*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal.), rejecting *Matter of Yajure Hurtado* and the predecessor ICE policy applying 235(b)(2)(A) detention without bond to all persons who entered without admission/inspection. The Immigration Courts are not recognizing the class action and still following *Matter of Yajure Hurtado.*

43. Section 1226(a) applies by default to all persons "pending a decision on whether the [noncitizen] is to be removed from the United States." These removal hearings are held under § 1229a, to "decid[e] the inadmissibility or deportability of a[] [noncitizen]."

44. The text of § 1226 also explicitly applies to people charged as being inadmissible, including those who entered without inspection. *See* 8 U.S.C. § 1226(c)(1)(E). Subparagraph (E)'s reference to such people makes clear that, by default, they are afforded a bond hearing under subsection (a). As the *Rodriguez Vazquez* court explained, "[w]hen Congress creates 'specific exceptions' to a statute's applicability, it 'proves' that absent those exceptions, the statute generally applies." *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 (citing *Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)); *see also Gomes*, 2025 WL 1869299, at *7.

45. Section 1226 therefore leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole.

46. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently entered the United States. The statute's entire framework is premised on inspections at the border of people who are "seeking admission" to the United States. 8 U.S.C. § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention scheme applies "at the Nation's borders and ports of entry, where the Government must determine whether a[] [noncitizen] seeking to enter the country is admissible." *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018).

47. Accordingly, the mandatory detention provision of § 1225(b)(2)(A) does not apply to people like Petitioner, who have already entered and were residing in the United States at the time they were apprehended.

CLAIMS FOR RELIEF

COUNT ONE
Violation of the INA

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

49. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those who previously entered the country and have been residing in the United States prior to being apprehended and placed in removal proceedings by Respondents. Such noncitizens are detained under § 1226(a), unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.

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

COUNT TWO
Violation of Due Process

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

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

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

54. The government's detention of Petitioner without a bond redetermination hearing to determine whether he is a flight risk or danger to others violates his right to due process.

COUNT THREE

Violation of Due Process – Constructive Denial of Bond
Through Excessive Amount

55. Petitioner incorporates by reference the allegations of fact and law set forth in the preceding paragraphs as if fully set forth herein.

56. Although Respondents have thus far consistently denied individuals in Petitioner's position any bond hearing by asserting that the Immigration Judge lacks jurisdiction under 8 U.S.C. § 1226(a), Respondents have increasingly taken the position—once jurisdiction

is found—that detention may nevertheless continue through the imposition of excessive and unpayable bond amounts.

57. A bond amount set beyond a detainee's ability to pay is the functional equivalent of continued detention, and therefore constitutes a constructive denial of bond.

58. The Due Process Clause does not permit the government to accomplish indirectly—through wealth-based detention—what it may not do directly: detain a noncitizen without a meaningful opportunity for release based on individualized findings of flight risk or danger.

59. Federal courts have repeatedly recognized that a bond hearing which fails to consider a detainee's ability to pay, or which results in continued detention solely because of indigence, is constitutionally inadequate and violates due process. *See*, e.g., *Pensamiento v. McDonald*, 315 F. Supp. 3d 684, 693–94 (D. Mass. 2018) (holding that due process requires immigration judges to consider ability to pay and alternatives to detention); *Doe v. Decker*, No. 21-cv-5257, 2021 WL 5112624, at *3 (S.D.N.Y. Nov. 3, 2021) (setting conditions on the adjudicator to consider ability to pay); *Hernandez v. Sessions*, 872 F.3d 976, 991 (9th Cir. 2017) (requiring individualized determinations and consideration of alternatives to detention).

60. Where, as here, detention has already been prolonged and the agency has adopted an unlawful interpretation that categorically forecloses bond jurisdiction, there is a substantial risk that any belated bond hearing will be rendered meaningless through the imposition of an excessive bond designed to ensure continued detention.

61. This Court's habeas authority includes the power to impose procedural safeguards necessary to ensure that any bond hearing ordered is meaningful and constitutionally adequate. Without such safeguards, Respondents could frustrate this Court's relief by granting bond in name only.

62. Accordingly, due process requires that if this Court orders a bond hearing under § 1226(a), the Immigration Judge must:

a. Consider Petitioner's ability to pay in setting any bond amount;

b. Ensure that any bond is reasonably calculated to secure appearance, not to effect continued detention;

c. Consider less restrictive alternatives to detention; and

d. Articulate findings tied to flight risk or danger, not generalized enforcement interests.

63. Absent compliance with these requirements, Petitioner's continued detention would violate the Due Process Clause of the Fifth Amendment.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests this Court to grant the following:

(1) Assume jurisdiction over this matter;

(2) Order that Petitioner shall not be transferred outside the Western District of Oklahoma while this habeas petition is pending;

(3) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.

(4) Issue a Writ of Habeas Corpus requiring that Respondents release Petitioner or, in the alternative, provide Petitioner with a bond hearing pursuant to 8 U.S.C. § 1226(a) within seven (7) days, at which the Immigration Judge must consider Petitioner's ability to pay, alternatives to detention, and may not impose a bond amount that results in continued detention based solely on indigence, or, in the alternative, order Petitioner's immediate release under appropriate conditions.

(5) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

(6) Grant any further relief this Court deems just and proper.

DATED this 9th of January 2026.

Respectfully submitted,

s/Kelli J. Stump
Kelli J. Stump
OBA No. 21374
Kelli J. Stump, PLLC
111 NW 15th St. Ste. B
Oklahoma City, Oklahoma 73103
(405)217-4550
kelli.stump@stumpimmigration.com
Attorney for the Petitioner

Dated: January 9, 2026

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

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

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of January, 2026, in Oklahoma City, Oklahoma.

Respectfully submitted,

s/Kelli J. Stump
Kelli J. Stump
OBA No. 21374
Kelli J. Stump, PLLC
111 NW 15th St. Ste. B
Oklahoma City, Oklahoma 73103
(405)217-4550
kelli.stump@stumpimmigration.com
Attorney for the Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2026, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Robert J. Troester, U.S. Attorney
Western District of Oklahoma
210 W. Park Avenue, Suite 400
Oklahoma City, OK 73102

s/Kelli J. Stump
Kelli J. Stump, OBA No. 21374