UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LEYDI MARIAN GONZALEZ-DIAZ, Petitioner, v. **KRISTI NOEM**, in her official capacity as Secretary of the Department of Homeland Security; **PAMELA BONDI**, in her official capacity as Attorney General of the United States; **TODD LYONS**, in his official capacity as Acting Director and Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement; **MIGUEL VERGARA,** in his official capacity as Field Office Director of the San Antonio Field Office of U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations; **ROSE THOMPSON**, in her official capacity as Warden of the Karnes County Immigration Processing Center, *Respondents.*	Case No. 5:26-cv-00201 **MOTION FOR TEMPORARY RESTRAINING ORDER**

TABLE OF CONTENTS

INTRODUCTION 5

STATEMENT OF FACTS 2

I. Habeas Relief 2

II. Detention Authority Under the INA 3

STANDARD OF REVIEW 5

ARGUMENTS 5

I. **Petitioner Has Established a Likelihood of Success on the Statutory Detention** 5

A. Petitioner's Prolonged Detention Without a Bond Hearing Is Unlawful Under the INA.. 5

B. DHS's Reliance on a Jurisdictional Technicality Has Deprived Petitioner of a Custody Review Mechanism 6

C. Continued Detention Violates Petitioner's Fifth Amendment Right to Due Process..... 7

II. **Petitioner Will Suffer Irreparable Harm Unless the Court Issues a Temporary Restraining Order** 8

III. **The Balance of Harms Weighs in Favor of Petitioner** 10

CONCLUSION 11

VERIFICATION PURSUANT TO 28 U.S.C. § 2242 14

CERTIFICATE OF SERVICE 15

TABLE OF AUTHORITIES

I. CASES

Alliance for the Wild Rockies v. Cottrell, 632 F.3d 1127 (9th Cir. 2011) 5

Clark v. Martinez, 543 U.S. 371 (2005) 5

Demore v. Kim, 538 U.S. 510 (2003) 3, 4

Foucha v. Louisiana, 504 U.S. 71 (1992) 7

Hernandez v. Sessions, 872 F.3d 976 (9th Cir. 2017) 6, 9

Jennings v. Rodriguez, 138 S. Ct. 830 (2018) 4, 8

Landon v. Plasencia, 459 U.S. 21 (1982) 7

Melendres v. Arpaio, 695 F.3d 990 (9th Cir. 2012) 8

Nken v. Holder, 556 U.S. 418 (2009) 10

O'Donnell v. Harris County, 892 F.3d 147 (5th Cir. 2018) 10

R.I.L-R v. Johnson, 80 F. Supp. 3d 164 (D.D.C. 2015) 8

Rodriguez v. Robbins, 804 F.3d 1060 (9th Cir. 2015), rev'd, Jennings, 138 S. Ct. 830 8

Sajous v. Decker, 2018 WL 2357266 (S.D.N.Y. May 23, 2018) 6, 9

Winter v. Nat. Res. Def. Council, Inc., 555 U.S. 7 (2008) 5, 8

Zadvydas v. Davis, 533 U.S. 678 (2001) 5, 11

II. AGENCY / ADMINISTRATIVE DECISIONS

Matter of Q. Li, 29 I. & N. Dec. 66 (BIA 2025) 6

III. STATUTES

8 U.S.C. § 1182(d)(5)(A) 5

8 U.S.C. § 1225(a)(1) 3

8 U.S.C. § 1225(b) 3,6

8 U.S.C. § 1225(b)(2)(A) 3

8 U.S.C. § 1226(a) 2, 3, 4, 6

8 U.S.C. § 1226(c) 3

8 U.S.C. § 1229a 3

8 U.S.C. § 1231(a)–(b) 3

28 U.S.C. § 2241(c)(3) 2

IV. REGULATIONS

8 C.F.R. § 1003.19(a) 3, 4, 6

8 C.F.R. § 1236.1(d) 3, 4, 6

INTRODUCTION

Petitioner Leydi Marian Gonzalez-Diaz is a 26-year-old Cuban citizen and national. She fled political persecution and government harassment in Cuba, seeking refuge and protection in the United States. Since her arrival, Petitioner has demonstrated exemplary conduct, complied with all immigration requirements, and consistently cooperated with immigration authorities. Petitioner has no criminal convictions, no record of violence, and has complied with every requirement imposed by the Department of Homeland Security ("DHS") and the Immigration Court.

Despite these equities, on September 26, 2025, Immigration and Customs Enforcement ("ICE") arrested Petitioner and placed her into DHS custody. Petitioner is properly detained under 8 U.S.C. § 1226(a) and is statutorily eligible for an individualized custody redetermination before an Immigration Judge.

However, Petitioner was categorically denied access to any bond hearing when the Immigration Judge concluded that the Court lacked jurisdiction to consider bond pursuant to *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). As a result of this jurisdictional ruling, the Immigration Judge declined to conduct any individualized custody assessment or to evaluate whether Petitioner poses a danger to the community or a risk of flight.

As a direct result of this unlawful categorical detention rule, Petitioner has been denied the individualized custody review guaranteed to her under the Immigration and Nationality Act, Administrative Procedure Act, Suspension Clause, the Due Process Clause of the Fifth Amendment and Accardi Doctrine. Her detention—civil in name yet punitive in effect—has become arbitrary and indefinite, without any individualized finding of danger or flight risk.

Petitioner is likely to succeed on the merits of her habeas claims because DHS's continued detention of Petitioner without any mechanism for individualized custody review violates the Immigration and Nationality Act, exceeds the agency's statutory authority, and deprives Petitioner of fundamental constitutional protections governing civil detention. Without immediate judicial intervention, Petitioner will continue to suffer irreparable harm, as she remains confined for an indefinite period despite her statutory eligibility for discretionary detention and her pending applications for asylum, withholding of removal, and protection under the Convention Against Torture.

For these reasons, Petitioner respectfully requests that this Court: (1) enjoin Respondents from transferring her outside this District while this action is pending; (2) direct Respondents to provide her a constitutionally adequate custody determination within three days, before a neutral decisionmaker with authority to grant release, at which DHS bears the burden of proving by clear and convincing evidence that continued detention is warranted; and (3) grant such other and further relief as law and justice require..

STATEMENT OF FACTS

Petitioner repeats and incorporates by reference each Statement of Facts contained in the Petition for *Writ of Habeas Corpus* as if fully set forth herein.

I. HABEAS RELIEF

To obtain habeas corpus relief, a petitioner must demonstrate that he is "in custody in violation of the Constitution or laws or treaties of the United States." *See* 28 U.S.C. § 2241(c)(3). This Court has *habeas corpus* jurisdiction to consider the statutory and constitutional grounds for immigration detention that are unrelated to a final order of removal. See *Demore v. Kim*, 538 U.S.

510, 517-18 (2003).

II. DETENTION AUTHORITY UNDER THE INA

The Immigration and Nationality Act ("INA") establishes three principal statutory bases for the detention of noncitizens in removal proceedings. First, 8 U.S.C. § 1226(a) authorizes the discretionary detention of noncitizens placed in standard removal proceedings under 8 U.S.C. § 1229a. Individuals detained under § 1226(a) are entitled to an individualized custody determination before an Immigration Judge and may seek release on bond or conditional parole. See 8 C.F.R. §§ 1003.19(a), 1236.1(d). By contrast, noncitizens falling within certain enumerated criminal categories are subject to mandatory detention under § 1226(c).

Second, the INA authorizes mandatory detention of certain arriving or recently arrived noncitizens placed in expedited removal or other admission-related proceedings under 8 U.S.C. § 1225(b). Individuals encountered at or near the border are deemed "applicants for admission," 8 U.S.C. § 1225(a)(1), and must demonstrate that they are "clearly and beyond a doubt" entitled to be admitted. Id. § 1225(b)(2)(A). Those who cannot make such a showing "shall be detained" pending resolution of their cases, unless temporarily paroled under § 1182(d)(5)(A).

Third, individuals subject to a final order of removal fall under the post-order detention scheme set forth in 8 U.S.C. § 1231(a)–(b), which authorizes detention only for a period reasonably necessary to effectuate removal. Sections 1226(a) and 1225(b)(2) were enacted through the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 ("IIRIRA"), while § 1226(c) was most recently amended by the Laken Riley Act in 2025.

Under this statutory framework, Petitioner's custody arises under § 1226(a). She is in standard § 240 removal proceedings before the Pearsall Immigration Court, has no criminal history, and is not subject to any final order of removal. DHS issued a Form I-200 Warrant for

Arrest, placing her squarely within the discretionary custody authority of § 1226(a), not within the mandatory detention authority. Nothing in § 1226(a) authorizes prolonged or indefinite detention of a noncitizen who poses no danger or flight risk; civil detention must remain reasonably related to the government's limited purposes of ensuring appearance and protecting public safety. See *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018); *Demore v. Kim*, 538 U.S. 510, 528–31 (2003).

Despite this statutory scheme, DHS has invoked the Board of Immigration Appeals' decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025) to argue that Immigration Judges lack jurisdiction to conduct bond hearings for individuals who DHS asserts were apprehended "shortly after entry." Relying on that interpretation, the Immigration Judge denied jurisdiction to consider Petitioner's bond request, despite her placement in § 240 proceedings, her service of a Form I-200 warrant, and her eligibility for custody redetermination under 8 C.F.R. §§ 1003.19(a), 1236.1(d).

This position effectively deprives Petitioner—and similarly situated individuals—of the statutory and regulatory protections that Congress and the Executive have long provided to noncitizens in § 240 proceedings. It results in prolonged detention with no individualized assessment of necessity, contrary to the INA's structure and purpose and inconsistent with constitutional limits on civil confinement.

Accordingly, Petitioner's continued detention falls outside the narrow detention authority conferred by the INA, which requires individualized custody review and prohibits arbitrary or indefinite detention—protections that Petitioner has been categorically denied.

STANDARD OF REVIEW

Temporary restraining orders and preliminary injunctions are evaluated under the same standard in the Ninth Circuit. Under the framework established by the Supreme Court in *Winter v.*

Natural Resources Defense Council, Inc., 555 U.S. 7, 20 (2008), a movant must demonstrate a likelihood of success on the merits, a likelihood of suffering irreparable harm in the absence of preliminary relief, that the balance of equities tips in the movant's favor, and that an injunction is in the public interest. The Ninth Circuit also recognizes a complementary "sliding scale" approach under which a movant may obtain relief by raising serious questions going to the merits and demonstrating that the balance of hardships tips sharply in her favor, so long as the remaining *Winter* factors are met. *Alliance for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1134–35 (9th Cir. 2011). A TRO is warranted where, as here, the petitioner faces ongoing constitutional violations and unlawful detention that threaten immediate, irreparable injury for which no adequate remedy exists at law.

ARGUMENTS

I. PETITIONER HAS ESTABLISHED A LIKELIHOOD OF SUCCESS ON THE STATUTORY DETENTION[1]

A. Petitioner's Prolonged Detention Without a Bond Hearing Is Unlawful Under the INA

The Immigration and Nationality Act ("INA") authorizes civil immigration detention only when it serves a legitimate statutory purpose: ensuring appearance at future proceedings or protecting public safety. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Clark v. Martinez*, 543 U.S. 371, 381 (2005). When detention ceases to advance those purposes or becomes arbitrary or

[1] See, e.g., *Alvarez Ortiz v. Freden*, No. 25-CV-960, *Ortiz v. Freden*, 2025 U.S. Dist. LEXIS 217654 (W.D.N.Y.Nov. 4, 2025) (granting temporary restraining order and requiring bond hearing within seven days); *Padron Covarrubias v. Vergara*, No. 5:25-CV-112, *Hernandez Capote v. Sec'y of United States Dep't of Homeland Sec.*, 2025 U.S. Dist. LEXIS 218136 (S.D. Tex. Oct. 8, 2025) (granting habeas relief under 8 USCS § 1226 and ordering a prompt bond hearing or release by a fixed deadline); *Guerrero Orellana v. Moniz*, No. 25-CV-12664, *Orellana v. Moniz*, 2025 U.S. Dist. LEXIS 196282 (D. Mass. Oct. 3, 2025) (holding that petitioner's detention is governed by § 1226(a) and enjoining continued custody without a bond hearing); *Lepe v. Andrews*, No. 1:25-CV-01163, *Lepe v. Andrews*, 2025 U.S. Dist. LEXIS 187233 (E.D. Cal. Sept. 23, 2025) (same).

indefinite, it exceeds the government's statutory authority.

Petitioner has now been detained for more than three years without any individualized determination regarding the necessity of her confinement. She was served with a Form I-200 arrest warrant when she was initially detained and placed in standard § 240 removal proceedings, making her detention subject to the discretionary framework of 8 U.S.C. § 1226(a). Petitioner has no criminal history, poses no danger to the community, and has consistently complied with the requirements imposed by DHS and the Pearsall Immigration Court. Despite these facts, her request for a custody redetermination was denied on jurisdictional grounds, and she remains confined at the Karnes County Immigration Processing Center in Karnes City, Texas, without any individualized custody assessment.

Courts have repeatedly held that prolonged civil detention without an individualized bond hearing violates both the INA and the Due Process Clause. See *Hernandez v. Sessions*, 872 F.3d 976, 991 (9th Cir. 2017) (requiring individualized assessments for prolonged detainees); see also *Sajous v. Decker*, 2018 WL 2357266, at *11 (S.D.N.Y. May 23, 2018) (holding detention unreasonable where government failed to justify continued confinement). Because Petitioner's detention no longer serves any legitimate governmental interest, it has become arbitrary, excessive, and unlawful under the INA.

B. DHS's Reliance on a Jurisdictional Technicality Has Deprived Petitioner of a Custody Review Mechanism.

DHS asserts that Petitioner is subject to mandatory detention under § 1225(b) of the INA based on disputed allegations that he was apprehended "shortly after entry." The government's own actions contradict that assertion. Petitioner was served with a Form I-200 Warrant for Arrest

and placed in § 240 removal proceedings governed by § 1226(a). Under these circumstances, jurisdiction over the bond lies with the Immigration Judge. See 8 C.F.R. §§ 1003.19(a), 1236.1(d).

Nevertheless, on December 22, 2025, the Immigration Judge at the Pearsall Immigration Court denied jurisdiction based solely on *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025) and made an *ultra vires* finding citing *Matter of R-A-V-P*, 27 I&N Dec. 803 (BIA 2020), which DHS invoked to classify Petitioner as categorically ineligible for release. This categorical approach—grounded entirely in DHS's untested characterization of her case—has deprived Petitioner of any meaningful mechanism to seek release. She cannot obtain a constitutionally adequate custody hearing before the Immigration Judge, and DHS has provided no meaningful discretionary parole or custody review.

This bureaucratic reclassification has placed Petitioner in administrative limbo: she is treated as an "arriving alien" for detention purposes but as a § 240 respondent for removal purposes. The statute does not authorize DHS to deny her access to a custody review process by manipulating jurisdictional labels. This misclassification is contrary to the INA, the governing regulations, and established precedent requiring individualized assessments of custody.

C. Continued Detention Violates Petitioner's Fifth Amendment Right to Due Process.

The Fifth Amendment guarantees that no person shall be deprived of liberty without due process of law, a protection that extends to all persons within the United States regardless of immigration status. *Zadvydas*, 533 U.S. at 693; *Landon v. Plasencia*, 459 U.S. 21, 32 (1982). Petitioner's prolonged detention—without any custody redetermination hearing, without

individualized assessment, and following the Immigration Judge's express denial of jurisdiction to consider bond on January 2, 2026—violates these core constitutional protections.

The Supreme Court has emphasized that "[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects." *Zadvydas*, 533 U.S. at 690 (quoting *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)). Applying the three-part balancing test of *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976), Petitioner's due process claim easily prevails.

First, the private interest at stake—freedom from physical confinement—is one of the most fundamental recognized in constitutional law; even more so, when the deprivation of liberty occurs outside the authority of the law.

Second, the risk of erroneous deprivation is extraordinarily high given DHS's unilateral detention classification and the Immigration Judge's categorical refusal to evaluate Petitioner's actual danger or flight-risk profile based on a jurisdictional bar, rather than on the facts of Petitioner's case.

Third, the government's interest in maintaining custody is minimal here, as Petitioner has no criminal history, substantial community ties, and has complied with every requirement imposed upon her. Because the government has provided no constitutionally adequate procedure to review the lawfulness or necessity of Petitioner's detention, her continued confinement violates the Due Process Clause. At a minimum, due process requires a prompt bond hearing before a neutral adjudicator at which DHS bears the burden of establishing, by clear and convincing evidence, that continued detention is necessary.

I. PETITIONER WILL SUFFER IRREPARABLE HARM UNLESS THE COURT ISSUES A TEMPORARY RESTRAINING ORDER

Under *Winter v. Natural Resources Defense Council*, 555 U.S. 7 (2008), Petitioner must demonstrate that he will suffer irreparable harm in the absence of immediate injunctive relief. In the immigration detention context, courts have consistently recognized that ongoing, unlawful deprivation of physical liberty constitutes irreparable harm as a matter of law. See *Rodriguez v. Robbins*, 804 F.3d 1060, 1080–81 (9th Cir. 2015), rev'd on other grounds sub nom. *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018); *R.I.L-R v. Johnson*, 80 F. Supp. 3d 164, 191 (D.D.C. 2015) ("the deprivation of physical liberty for even one day constitutes irreparable harm"). Petitioner's continued confinement—following the Immigration Judge's denial of jurisdiction to conduct a bond hearing on December 22, 2025—inflicts exactly the sort of harm that the *Winter* standard contemplates.

Petitioner has been detained for several months at the Karnes County Immigration Processing Center in Karnes City, Texas, a secure civil detention facility whose conditions closely resemble those of a penal institution. She is deprived of freedom of movement, placed under strict institutional control, separated from her family and community support network, and subjected to continuous monitoring. Every additional day of confinement deepens the constitutional injury she suffers from being denied access to a bond hearing or any meaningful opportunity to challenge the legality of her detention.

Courts have recognized that "[p]rolonged detention without an individualized determination of dangerousness or flight risk inflicts irreparable injury on detainees." *Sajous v. Decker*, 2018 WL 2357266, at *12 (S.D.N.Y. May 23, 2018). The harm here is neither hypothetical nor remote; it is ongoing, acute, and directly attributable to Respondents' refusal to provide Petitioner with a custody determination. See also *Leal-Hernandez v. Noem*, No. 1:25-cv-02428,

2025 WL 327685, at *37 (D. Md. Aug. 24, 2025) (finding irreparable harm where petitioner remained detained without any lawful process or review).

Petitioner's continued incarceration has also caused significant emotional and psychological harm. Her declaration and supporting records reflect escalating anxiety, depression, insomnia, and fear stemming from the uncertainty of her circumstances, separation from family, and the stressful, punitive conditions of confinement. Such mental and emotional injuries cannot be undone after the fact, nor can they be compensated monetarily. The Ninth Circuit has recognized that "every day of detention is another day of lost liberty that cannot be recovered." *Hernandez v. Sessions*, 872 F.3d 976, 994 (9th Cir. 2017).

The public interest likewise favors immediate intervention. Preventing constitutional violations is always in the public interest. *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012). Allowing DHS to continue detaining Petitioner indefinitely without lawful authority or individualized review undermines the integrity of the immigration system and erodes public confidence in the rule of law.

Accordingly, Petitioner has demonstrated irreparable harm of the highest order. Immediate judicial intervention is necessary to prevent further unlawful deprivation of liberty and to ensure compliance with the statutory and constitutional safeguards governing civil detention.

II. THE BALANCE OF HARMS WEIGHS IN FAVOR OF PETITIONER

The final two *Winter* factors—the balance of equities and the public interest—strongly favor granting injunctive relief. Where the government is a party, these factors merge. *Nken v. Holder*, 556 U.S. 418, 435 (2009). Together, they require the Court to consider whether the harm to Petitioner from continued detention outweighs any harm to the government arising from her

release or from providing a prompt bond hearing, and whether such relief advances or undermines the public interest.

Here, the equities tilt sharply in Petitioner's favor. Every additional day of confinement inflicts a profound deprivation of liberty. It exacerbates the psychological and emotional harm that Petitioner has already suffered during her prolonged incarceration at the Karnes County Immigration Processing Center in Karnes City, Texas. Petitioner has no criminal history, poses no danger to the community, and has consistently complied with every requirement imposed by DHS and the Immigration Court. Her continued detention serves no legitimate purpose under the Immigration and Nationality Act ("INA"). It directly contradicts the government's stated interest in detaining only those who present a genuine risk of flight or a threat to public safety.

By contrast, the government faces minimal—if any—harm if relief is granted. Releasing Petitioner under reasonable supervision or providing her with a constitutionally adequate bond hearing does not impede any lawful enforcement objective. As courts have observed, "[t]he government suffers no harm when it is required to adhere to the Constitution." *O'Donnell v. Harris County*, 892 F.3d 147, 155 (5th Cir. 2018). Administrative convenience cannot justify prolonged, unlawful detention that exceeds statutory authority or violates constitutional protections.

The public interest also strongly favors Petitioner. The public has an overriding interest in ensuring that immigration detention is conducted lawfully, in accordance with due process, and only for legitimate statutory purposes. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (warning that indefinite civil detention "would raise serious constitutional concerns"); *Beltran v. Smith*, 458 F. Supp. 3d 1139, 1145 (D. Colo. 2020) (ordering release where detention no longer served INA objectives). Upholding constitutional safeguards for individuals in civil immigration custody

reinforces the integrity of the justice system and affirms that the government must operate within the bounds of law and necessity.

Balancing these considerations, both the equities and the public interest weigh decisively in favor of Petitioner's release or, at minimum, a prompt bond hearing before a neutral adjudicator. Granting relief will prevent further irreparable harm to Petitioner and promote the public's compelling interest in ensuring that the government complies with statutory and constitutional constraints governing civil detention.

CONCLUSION

For the reasons set forth above, Petitioner Leydi Marian Gonzalez-Diaz has demonstrated a clear likelihood of success on the merits of her claims, will suffer irreparable harm in the absence of immediate relief, and has shown that the balance of equities and the public interest overwhelmingly favor granting a temporary restraining order. Her continued detention—following the Immigration Judge's denial of jurisdiction to conduct a bond hearing on December 22, 2025, without an individualized custody determination, and without any meaningful judicial review—violates the Immigration and Nationality Act, the Due Process Clause of the Fifth Amendment, and the *Accardi* doctrine.

Accordingly, Petitioner respectfully requests that this Honorable Court:

1. Enjoin Respondents and their agents from transferring Petitioner outside the jurisdiction of this Court while this matter is pending;

2. Direct Respondents to provide her with a constitutionally adequate bond hearing before a neutral Immigration Judge within three (3) days, at which the government bears

the burden of proving, by clear and convincing evidence, that continued detention is necessary; and

3. Grant such other and further relief as the Court deems just and proper.

Dated: January 16, 2026

/S/ Halimatou Bah

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

I represent Petitioner, LEYDI MARIAN GONZALEZ-DIAZ, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Temporary Restraining Order are true and correct to the best of my knowledge.

Dated: January 16, 2026

/S/ Halimatou Bah
Halimatou Bah

CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2026, I filed the foregoing petition for Temporary Restraining Order electronically through the CM/ECF system, which caused all parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

Dated: January 16, 2026

/S/ Halimatou Bah
Halimatou Bah