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13 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

14 Rondon Castellano Jhan Carlos,

15 Petitioner,

16 v.

17 John Mattos, Michael Bernacke, Kerri
18 Ann Quihuis, Todd Lyons, Kristi Noem,
and Pam Bondi,

19 Respondents.
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Case No. 2:26-cv-00124-GMN-BNW

**First Amended 28 U.S.C. § 2241
Petition**

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Ground One: Mr. Rondon Castellano’s prolonged detention without a bond hearing based on an offense for which he has not been convicted violates his right to due process under the Fifth Amendment of the United States Constitution..... 4

 A. Under the test set forth in *Mathews v. Eldridge*, the Laken Riley Act’s mandatory detention provision is unconstitutional as applied to Mr. Rondon Castellano. 5

 B. This Court should order Respondents to release Mr. Rondon Castellano or provide a constitutionally adequate hearing to seek release on bond. 10

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1 INTRODUCTION

2 Jhan Carlos Rondon Castellano, a citizen of Venezuela, was paroled into the
3 United States in 2023. In July 2025, he was arrested in Salt Lake County, Utah.
4 However, before his initial appearance on the underlying charges, he was
5 transferred to Immigration and Customs Enforcement (ICE) custody.

6 Mr. Rondon Castellano has now been in ICE custody for over six months
7 without a bond hearing because, under the Laken Riley Act, individuals who have
8 been arrested for or charged with a theft-related offense are subject to mandatory
9 detention. In other words, Mr. Rondon Castellano has been deprived of a bond
10 hearing based on pending criminal charges that have not been proven and that he
11 cannot defend against due to his continued detention in another state.

12 Mr. Rondon Castellano’s prolonged detention without a bond hearing based
13 on an offense that he has not been convicted of violates his right to due process
14 under the Fifth Amendment of the United States Constitution.

15 JURISDICTION AND VENUE

16 This Court has jurisdiction pursuant to 28 U.S.C. § 2241, which grants a
17 federal court the authority to issue a writ of habeas corpus to an individual “in
18 custody in violation of the Constitution or laws or treaties of the United States.” 28
19 U.S.C. § 2241(c)(3); *see also Demore v. Kim*, 538 U.S. 510, 516–17 (2003) (holding
20 that § 2241 is the proper vehicle through which to challenge the constitutionality of
21 a noncitizen’s detention without bail); *Jennings v. Rodriguez*, 583 U.S. 281, 294–296
22 (2018) (holding that neither 8 U.S.C. § 1226(e) nor § 1252(b)(9) bars review of
23 constitutional challenges to prolonged immigration detention without bail).

24 Venue is proper in the District of Nevada under 28 U.S.C. § 1391(e) because
25 Mr. Rondon Castellano is detained in this district and a substantial part of the
26 events or omissions giving rise to Mr. Rondon Castellano’s claim occurred in this
27 district.

PARTIES

1
2 Petitioner Jhan Carlos Rondon Castellano is a citizen of Venezuela who
3 entered the United States in December 2023. He is currently detained by ICE at the
4 Nevada Southern Detention Center in Pahrump, Nevada.

5 Respondent John Mattos is the warden of the Nevada Southern Detention
6 Center. Mr. Mattos is named in his official capacity and is the immediate custodian
7 of Mr. Rondon Castellano.

8 Respondent Michael Bernacke is the Field Office Director for the Salt Lake
9 City Field Office of ICE Enforcement and Removal Operations, which has
10 jurisdiction over detention facilities in Nevada, including Nevada Southern
11 Detention Center. Mr. Bernacke is named in his official capacity and is a legal
12 custodian of Mr. Rondon Castellano.

13 Respondent Kerri Ann Quihuis is the Field Office Director for the Las Vegas
14 Field Office of ICE, which has jurisdiction over Mr. Rondon Castellano. Ms. Quihuis
15 is named in her official capacity and is a legal custodian of Mr. Rondon Castellano.

16 Respondent Todd Lyons is the Acting Director of ICE. Mr. Lyons is named in
17 his official capacity. As the leader of ICE, the agency responsible for detaining and
18 removing noncitizens, he is a legal custodian of Mr. Rondon Castellano.

19 Respondent Kristi Noem is the Secretary of the United States Department of
20 Homeland Security (DHS). Ms. Noem is named in her official capacity. As the
21 Secretary of DHS, Ms. Noem is responsible for the administration of immigration
22 laws. *See* 8 U.S.C. § 1103(a). She is a legal custodian of Mr. Rondon Castellano.

23 Respondent Pam Bondi is the Attorney General of the United States and the
24 most senior official in the United States Department of Justice. Ms. Bondi is named
25 in her official capacity. The Attorney General delegates her authority to interpret
26 the immigration laws and adjudicate removal cases to the Executive Office of
27 Immigration Review, which includes the immigration courts and the Board of

1 Immigration Appeals. *See* 8 C.F.R. § 1003.0. Ms. Bondi is a legal custodian of Mr.
2 Rondon Castellano.

3 **PROCEDURAL HISTORY**

4 Jhan Carlos Rondon Castellano was paroled into the United States on
5 December 12, 2023.¹ He sought asylum after his arrival based on his credible fear of
6 persecution if returned to Venezuela.²

7 On July 26, 2025, Mr. Rondon Castellano was arrested in Salt Lake County,
8 Utah, on charges of forgery and theft.³ Mr. Rondon Castellano contests the charges
9 and believes he has a viable defense.

10 Although he posted bail shortly after his arrest, Mr. Rondon Castellano
11 remained in state custody until August 5, 2025, when he was transferred to ICE
12 custody and placed in removal proceedings.⁴ He never had an initial appearance in
13 his Utah case, nor did he ever have the opportunity to consult with an attorney
14 regarding the charges.⁵

15 In immigration court, Mr. Rondon Castellano sought a bond hearing. The
16 immigration judge denied the request on the ground that Mr. Rondon Castellano's
17 pending charges subject him to mandatory detention under the Laken Riley Act. *See*
18 8 U.S.C. § 1226(c)(1)(E)(ii).

19
20 _____
21 ¹ Ex. 1.

22 ² Factual allegations presented without citation to exhibits are made on
23 information and belief. Additional relevant documents that could corroborate these
24 allegations are in Respondents' possession.

25 ³ Ex. 5.

26 ⁴ *Id.*

27 ⁵ *See* Ex. 4 at 4–5. After Mr. Rondon Castellano posted bail, the Salt Lake
County District Court set his initial appearance for August 21, 2025. *Id.* at 4. By
that date, however, Mr. Rondon Castellano had been transferred to ICE custody.
Ex. 5. The Salt Lake County District Court issued a warrant based on Mr. Rondon
Castellano's failure to appear for the hearing. *Id.* at 4–5.

1 On October 20, 2025, Mr. Rondon Castellano was ordered removed.⁶ He filed
2 a timely appeal with the Board of Immigration Appeals.⁷ See 8 C.F.R. § 1003.38(b).
3 That appeal is still pending.

4 **GROUND FOR RELIEF**

5 **Ground One: Mr. Rondon Castellano’s prolonged detention without a bond**
6 **hearing based on an offense for which he has not been convicted violates**
7 **his right to due process under the Fifth Amendment of the United States**
8 **Constitution.**

9 The Fifth Amendment prohibits the government from depriving a person of
10 liberty without due process of law. U.S. Const. amend. V; accord *Zadvydas v. Davis*,
11 533 U.S. 678, 690 (2001). “Arbitrary civil detention is not a feature of our American
12 government.” *Rodriguez v. Marin*, 909 F.3d 252, 256 (9th Cir. 2018). Accordingly,
13 several circuit courts have concluded that prolonged mandatory detention of a
14 noncitizen while their removal proceedings are pending violates due process. See,
15 e.g., *Black v. Decker*, 103 F.4th 133, 155 (2d Cir. 2024) (holding that “due process
16 entitled [petitioners] to individualized bond hearings by an [immigration judge]
17 once their detentions became unreasonably prolonged”); *Reid v. Donelan*, 17 F.4th 1,
18 7 (1st Cir. 2021) (“[W]e adhere to the notion that the Due Process Clause imposes
19 some form of reasonableness limitation upon the duration of detention[.]” (internal
20 quotation marks omitted)); *Rodriguez*, 909 F.3d at 256 (expressing “grave doubts
21 that any statute that allows for arbitrary prolonged detention without any process
22 is constitutional”).

23 //

24 //

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26 ⁶ Ex. 2.

27 ⁷ Ex. 3.

1 **A. Under the test set forth in *Mathews v. Eldridge*, the Laken**
2 **Riley Act’s mandatory detention provision is unconstitutional**
3 **as applied to Mr. Rondon Castellano.**

4 Under the Immigration and Nationality Act, which governs the detention of
5 noncitizens in removal proceedings, there are two basic forms of detention:
6 discretionary detention pursuant to 8 U.S.C. § 1226(a), and mandatory detention
7 pursuant to 8 U.S.C. §§ 1225(b) and 1226(c).

8 In accordance with the requirements of due process, noncitizens subject to
9 prolonged detention under § 1226(a) are entitled to a bond hearing before an
10 immigration judge. *Hernandez-Lara v. Lyons*, 10 F.4th 19, 27, 41 (1st Cir. 2021). At
11 such hearing, the government bears the burden of proving by clear and convincing
12 evidence that the noncitizen is dangerous or a flight risk to justify their continued
13 detention. *Id.* at 27, 41.

14 By contrast, noncitizens detained pursuant to § 1226(c) are ineligible for bond
15 hearings. *See* 8 U.S.C. § 1226(c)(1) (identifying circumstances where the
16 government “shall” take a noncitizen into custody). In enacting this provision,
17 Congress relied on legislative findings that individuals with certain criminal
18 convictions posed elevated risks of dangerousness and flight. *Demore v. Kim*, 538
19 U.S. 510, 518–21 (2003).

20 The Laken Riley Act, passed by Congress in 2025, amended § 1226(c) to make
21 a new category of noncitizens subject to mandatory detention. *See* Pub. L. No. 119-1,
22 139 Stat. 3 (2025). As amended, § 1226(c) mandates detention of an individual who
23 “is *charged with*, is *arrested for*, [or] is convicted of . . . acts which constitute the
24 essential elements of any burglary, theft, larceny, shoplifting . . . offense.” 8 U.S.C.
25 § 1226(c)(1)(E)(ii) (emphasis added).

26 Mr. Rondon Castellano has been denied a bond hearing under the Laken
27 Riley Act due to the charges pending against him in Utah. However, the Laken
Riley Act’s mandatory detention provision is unconstitutional as applied to him—

1 detaining Mr. Rondon Castellano without a bond hearing based on an offense that
2 he has not been convicted of and has had no opportunity to defend against violates
3 his due process rights.

4 In an analogous case, the United States District Court for the District of
5 Massachusetts considered the constitutionality of the Laken Riley Act's mandatory
6 detention provision as applied to a noncitizen who had been arrested for shoplifting.
7 *Doe v. Moniz*, 800 F. Supp. 3d 203, 207 (D. Mass. 2025). As an initial matter, the
8 court concluded that the petitioner's challenge was not foreclosed by United States
9 Supreme Court precedent: “[n]either [*Demore v. Kim*, 538 U.S. 510 (2003) nor
10 *Zadvydas v. Davis*, 533 U.S. 678 (2001)] justifies detention without due process for
11 an individual who has not been convicted of a crime.” *Id.* at 215.

12 The court proceeded to apply the three-part test established in *Mathews v.*
13 *Eldridge*, 424 U.S. 319 (1976), in assessing whether the petitioner's continued
14 detention without a bond hearing pursuant to the Laken Riley Act violated due
15 process. *See Doe*, 800 F. Supp. 3d at 216–17. The *Mathews* factors are (1) “the
16 private interest that will be affected by the official action”; (2) “the risk of an
17 erroneous deprivation of such interest through the procedures used, and probable
18 value, if any, of additional procedural safeguards”; and (3) “the Government's
19 interest, including the function involved and the fiscal and administrative burdens
20 that the additional or substitute procedural requirement would entail.” *Mathews*,
21 424 U.S. at 335. Concluding that these factors weighed in favor of finding a due
22 process violation, the court ordered the immigration court to provide the petitioner
23 with a bond hearing. *Doe*, 800 F. Supp. 3d at 216–17.

24 The *Mathews* factors weigh equally in favor of finding a due process violation
25 in Mr. Rondon Castellano's case.

26 As to the first *Mathews* factor, the private interest at issue is indisputably
27 substantial. Mr. Rondon Castellano's interest in being free from physical detention

1 is “the most elemental of liberty interests.” *Hamdi v. Rumsfeld*, 542 U.S. 507, 529
2 (2004); accord *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992) (“Freedom from bodily
3 restraint has always been at the core of the liberty protected by the Due Process
4 Clause from arbitrary governmental action.”). Moreover, Mr. Rondon Castellano has
5 been detained for over six months. The duration of his detention without a bond
6 hearing reinforces the gravity of the interest affected by the immigration court’s
7 application of § 1226(c). See *Black*, 103 F.4th at 150 (“[A]ny immigration detention
8 exceeding six months without a bond hearing raises serious due process concerns.”).

9 Mr. Rondon Castellano’s liberty interest is not materially diminished by his
10 decision to challenge his removal order. He has sought asylum based on his credible
11 fear of persecution if returned to Venezuela. Because he has raised a substantial
12 and legitimate challenge to his removal, the exercise of his appellate rights does not
13 reduce his considerable interest in being free from prolonged detention. See *Ortiz-*
14 *Castillo v. United States*, No. 2:23-cv-01485-RFB-MDC, 2024 WL 756075, at *3 (D.
15 Nev. Feb. 23, 2024) (finding first *Mathews* factor weighed in petitioner’s favor
16 because petitioner’s substantial liberty interest was only “minimally” diminished by
17 the fact that he raised “legitimate collateral challenges to his removal order” and
18 “made use of the statutorily permitted appeals process” (internal quotation marks
19 omitted)).

20 As to the second *Mathews* factor, the risk of erroneous deprivation of Mr.
21 Rondon Castellano’s liberty interest in the absence of an individualized custody
22 determination is high. “Liberty is the norm, and detention prior to trial or without
23 trial is the carefully limited exception.” *Rodriguez*, 909 F.3d at 256–57 (quoting
24 *United States v. Salerno*, 481 U.S. 739, 755 (1987)) (internal brackets omitted).
25 Thus, detention of noncitizens in removal proceedings is only permissible for the
26 limited purposes of protecting the community and preventing flight. See *Zadvydas*,
27 533 U.S. at 690–91. Continuing to detain Mr. Rondon Castellano without a bond

1 hearing based on unproven allegations raises a significant possibility of erroneously
2 depriving him of his liberty interest—that is, of detaining him even though he is
3 neither dangerous nor a flight risk. Notably, in enacting the Laken Riley Act,
4 Congress made no findings that merely being arrested for or charged with a theft-
5 related offense corresponds to a higher risk of dangerousness or flight. *See* 139 Stat.
6 at 3; *see also Doe*, 800 F. Supp. 3d at 216 (“Respondents have not disputed
7 Petitioner’s assertions that the Congress enacting the Laken Riley Act made no
8 findings that merely being *arrested for* shoplifting correlated with flight risk or
9 dangerousness in any way.” (cleaned up)); *E.C. v. Noem*, No. 2:25-cv-01789-RFB-
10 BNW, 2025 WL 2916264, at *4 (D. Nev. Oct. 14, 2025) (“In [enacting the Laken
11 Riley Act,] Congress did not rely on any findings linking criminal charges or arrests
12 for [theft-related] offenses with higher risks of flight or danger.”).

13 In addition, the probable value of a bond hearing in ensuring that Mr.
14 Rondon Castellano is not erroneously deprived of his liberty interest is high. “[A]n
15 individualized bond hearing . . . would require the Government to establish that
16 [Mr. Rondon Castellano] presents a flight risk or danger to the community[.]” *See*
17 *E.C.*, 2025 WL 2916264, at *10; *see also A.E. v. Andrews*, No. 1:25-cv-00107-KES-
18 SKO-HC, 2025 WL 1424382, at *5 (E.D. Cal. May 16, 2025) (“[T]he probable value
19 of additional procedural safeguards, i.e., a bond hearing, is high, because
20 Respondents have provided virtually no procedural safeguards at all.”), *report and*
21 *recommendation adopted*, 2025 WL 1808676 (E.D. Cal. July 1, 2025). As one district
22 court has stated, there is “immense benefit to be gleaned—protection against
23 arbitrary and prolonged detention during removal proceedings—in exchange for the
24 minimal fiscal and administrative burden of a bond hearing.” *Hong v. Mayorkas*,
25 No. 20-CV-01784-LK, 2022 WL 1078627, at *5 (W.D. Wash. Apr. 11, 2022).

26 As to the third and final *Mathews* factor, the government’s limited interest in
27 continuing to detain Mr. Rondon Castellano without a bond hearing is insufficient

1 to justify the significant risk of erroneously depriving him of his interest in being
2 free from prolonged detention. While the government may have “a strong interest in
3 preventing [noncitizens] from remaining in the United States in violation of our
4 law” and “protecting the public from dangerous criminal[s],” *Rodriguez Diaz*, 53
5 F.4th 1189, 1208 (9th Cir. 2022) (quoting *Demore*, 538 U.S. at 515, 518) (cleaned
6 up), such interests are not implicated by the instant petition. “[T]he government
7 interest at stake here is not [Mr. Rondon Castellano’s] continued detention . . . , but
8 the government’s ability to detain him without a bond hearing.” *Singh v. Garland*,
9 No. 1:23-CV-01043-EPG-HC, 2023 WL 5836048, at *6 (E.D. Cal. Sept. 8, 2023)
10 (internal quotation marks omitted); *see also Henriquez v. Garland*, No. 5:22-cv-
11 00869-EJD, 2022 WL 2132919, at *5 (N.D. Cal. June 14, 2022) (“Although the
12 Government has a strong interest in enforcing the immigration laws and in
13 ensuring that lawfully issued removal orders are promptly executed, the
14 Government’s interest in detaining Petitioner without providing an individualized
15 bond hearing is low.”); *E.C.*, 2025 WL 2916264, at *12 (“[T]o the extent Petitioner
16 poses [a risk of flight or danger to the community], the Government’s interest is
17 adequately protected by the bond hearing process, and its ability to present
18 individualized evidence regarding its contention that prolonged detention of
19 Petitioner is warranted.”).

20 Moreover, “[c]ourts generally have found that the cost of providing a bond
21 hearing is relatively minimal.” *Eliazar G.C. v. Wofford*, No. 1:24-CV-01032-EPG-
22 HC, 2025 WL 711190, at *8 (E.D. Cal. Mar. 5, 2025); *see also Singh v. Barr*, 400 F.
23 Supp. 3d 1005, 1021–22 (S.D. Cal. 2019) (“Here, given the ‘minimal cost of
24 conducting a bond hearing, and the ability of the [immigration judge] to adjudicate
25 the ultimate legal issue as to whether [petitioner’s] continued detention is justified,
26 the Court concludes that the government’s interest is not as weighty as
27 [petitioner’s].”); *accord Hong*, 2022 WL 1078627, at *5. Indeed, “limiting the use of

1 detention to only those noncitizens who are dangerous or a flight risk may save the
2 government, and therefore the public, from expending substantial resources on
3 needless detention.” *Hernandez-Lara*, 10 F.4th at 33 (citing *Velasco Lopez v. Decker*,
4 978 F.3d 842, 854 n.11 (2d Cir. 2020), for data on daily costs of ICE detention).

5 In sum, while providing Mr. Rondon Castellano with a bond hearing would
6 place only a minimal burden on the government, the denial of a bond hearing
7 imposes a substantial burden on Mr. Rondon Castellano—who has already endured
8 over six months of incarceration based solely on criminal charges that he cannot
9 defend against given his ongoing detention. The *Mathews* factors therefore weigh in
10 favor of finding that the Laken Riley Act’s mandatory detention provision, as
11 applied to Mr. Rondon Castellano, violates due process. Given that 8 U.S.C.
12 § 1226(c) cannot constitutionally be applied to Mr. Rondon Castellano, § 1226(a)
13 governs his continued detention.

14 **B. This Court should order Respondents to release Mr. Rondon**
15 **Castellano or provide a constitutionally adequate hearing to**
16 **seek release on bond.**

17 Because depriving Mr. Rondon Castellano of a bond hearing under the Laken
18 Riley Act violates his Fifth Amendment right to due process, the government must
19 provide him with a constitutionally adequate hearing at which he can seek release
20 on bond, with the government bearing the burden of demonstrating that his
21 continued detention is warranted. If Mr. Rondon Castellano is not granted such a
22 hearing, he must be released from his unconstitutional detention. *See, e.g., Lopez*
23 *Reyes v. Bonnar*, 362 F. Supp. 3d 762, 778 (N.D. Cal. 2019) (granting relief and
24 ordering the government to hold a timely bond hearing or release the petitioner);
25 *E.C.*, 2025 WL 2916264, at *13 (same); *Arechiga v. Archambeault*, No. 2:23-cv-
26 00600-CDS-VCF, 2023 WL 5207589, at *1 (D. Nev. Aug. 11, 2023) (ordering the
27 government to provide the petitioner with a timely bond hearing, with the burden

1 on the government to “establish[] by clear and convincing evidence that [petitioner]
2 is a flight risk or a danger to the community”).

3 In light of Mr. Rondon Castellano’s prolonged detention to date, the Court
4 should order his release if Respondents fail to schedule a bond hearing before an
5 immigration judge within 30 days.

6
7 **PRAYER FOR RELIEF**

8 Accordingly, Jhan Carlos Rondon Castellano respectfully requests that this
9 Court:

10 1. Issue a writ of habeas corpus to have Jhan Carlos Rondon Castellano
11 brought before the Court so that he may be discharged from his unconstitutional
12 confinement within 30 days unless Respondents schedule a bond hearing before an
13 immigration judge at which the judge must order the release of Jhan Carlos Rondon
14 Castellano unless ICE can establish by clear and convincing evidence that he
15 presents a risk of flight or danger to the community.

16 2. Grant such other and further relief as, in the interests of justice, may
17 be appropriate.

18 Dated February 13, 2026.

19 Respectfully submitted,

20 Rene L. Valladares
21 Federal Public Defender

22 /s/ Bethany Wang Balchunas
23 Bethany Wang Balchunas
24 Assistant Federal Public Defender

25 /s/ Laura Barrera
26 Laura Barrera
27 Assistant Federal Public Defender

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on February 13, 2026. I personally served a true and correct copy of the foregoing index and exhibits in support of the first amended petition by CM/ECF to the following individuals:

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I further certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage pre-paid, or have dispatched it to a third-party commercial carrier for delivery within three calendar days, to the following persons:

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