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11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 Emine Sahin,

15 Petitioner,

16 v.

17 Reggie Rader, Henderson Chief of Police;
18 Michael Bernacke, Field Director, West
19 Valley City Office of ICE ERO; Todd
20 Lyons, ICE Acting Director; Kristi Noem
21 DHS Secretary; Pam Bondi, U.S. Attorney
22 General, et al.,

23 Respondents.
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Case No. 2:26-cv-00134-RFB-MDC

**Petitioner's Emergency Motion for
Temporary Restraining Order**

HEARING REQUESTED

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INTRODUCTION

Petitioner Emine Sahin faces immediate irreparable harm because her continued detention violates (1) the Due Process Clause of the Fifth Amendment to the U.S. Constitution ; (2) the Administrative Procedure Act, 5 U.S.C. § 706(2)(A) and Immigration and Customs Enforcement (“ICE”) Directive 11032.4 that governs the detention of pregnant women; and (3) her procedural due process rights because she is entitled to the opportunity to seek release on bond under 8 U.S.C. § 1226(a). Sahin is in the 23rd week of a high-risk pregnancy, and her continued unlawful detentions puts her and her unborn child at risk. This Court should grant emergency temporary relief to prevent any further irreparable injury based on her continued illegal detention.

Sahin’s detention runs afoul of the Fifth Amendment due process guarantees, the APA’s mandate that federal agencies comply with existing regulations and policies, and ICE’s policies regarding the detention of pregnant women. Should she be released, she plans to reunite with her husband in Las Vegas and seek immediate prenatal care in the community.

The requested emergency temporary restraining order (“TRO”) would address the irreparable injury that Sahin is currently experiencing by ordering Respondents to release Sahin and allowing her to obtain immediately necessary medical care to promote a health pregnancy. Sahin therefore respectfully requests that this Court grant this emergency TRO.

STATEMENT OF FACTS

Sahin outlined relevant facts regarding her immigration history and medical issues related to her pregnancy in her petition for writ of habeas corpus.¹ Sahin incorporates those facts by reference and provides additional details.

Sahin is a pregnant asylum-seeker in ICE custody in the Henderson Detention Center. Sahin’s condition in custody has required offsite medical

¹ ECF No. 2 at 4–5.

1 intervention on two occasions. Beginning on October 18, 2025, she “experienced
2 pain and cramps in her groin area and it continued for about 10 days.”² On the 11th
3 day, ICE transported her to the emergency room for blood and urine testing.³ Sahin
4 was transported to a clinic on December 1, 2025, due to her worsening health
5 condition.⁴ The treating physician opined that the supplements and medical care
6 Sahin was receiving in custody were insufficient.⁵ The doctor further advised that
7 Sahin needed to return for weekly follow-up appointments for the next 6 weeks in
8 order to run tests on the baby.⁶ ICE has failed to comply with the doctor’s orders.
9 Sahin has not been examined by a physician since December 1.⁷

10 Sahin is not receiving the basic care that is necessary to ensure a healthy
11 pregnancy. She is not being given pre-natal vitamins⁸ or a diet suitable for a
12 pregnant mother.⁹ She has not been provided fresh fruits or vegetables while in
13 custody.¹⁰ Other than her two emergency visits, Sahin has not received any other
14 medical evaluations, pregnancy examinations or ultrasounds.¹¹ She frequently
15 suffers from pain and illness related to her pregnancy and has not received any
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18 ² ECF No. 3-26 at 2, ¶ 13. (The exhibits referenced herein are the exhibits
19 filed in support of the petition.)

20 ³ *Id.* at ¶ 14.

21 ⁴ *Id.* at ¶ 15.

22 ⁵ *Id.* at ¶ 16.

23 ⁶ *Id.* at ¶ 17.

24 ⁷ *Id.* at ¶ 18.

25 ⁸ ECF No. 3-26 at 3, ¶ 21.

26 ⁹ John Hopkins Medicine, *Nutrition During Pregnancy*,
27 <https://www.hopkinsmedicine.org/health/wellness-and-prevention/nutrition-during-pregnancy> (last visited January 21, 2026).

¹⁰ ECF No. 3-26 at 3, ¶ 22.

¹¹ *Id.* at ¶ 20.

1 intervening care.¹² Specifically, Sahin has been suffering from low blood pressure.¹³
2 The low blood pressure causes headaches and dizziness.¹⁴ While ICE has monitored
3 her blood pressure, no medication or treatment plan has been offered to manage
4 this condition.¹⁵

5 Sahin's recent previous miscarriage already places her in a high-risk
6 pregnancy category. Her continued detention, under these abhorrent conditions,
7 further exacerbates the risk of adverse health outcomes for Sahin and her unborn
8 child.

9 ARGUMENT

10 To obtain a TRO, a plaintiff “must establish that he is likely to succeed on the
11 merits, that he is likely to suffer irreparable harm in the absence of preliminary
12 relief, that the balance of equities tips in his favor, and that an injunction is in the
13 public interest.” *Winter v. Nat. Res. Def Council, Inc.*, 555 U.S. 7, 20 (2008); accord
14 *Stuhlbarg Int’l Sales Co. v. John D. Brush & Co.*, 240 F.3d 832, 839-40 & n.7 (9th
15 Cir. 2001) (noting that a TRO and preliminary injunction involve “substantially
16 identical” analysis). A “variant[] of the same standard” is the “sliding scale”: “if a
17 plaintiff can only show that there are ‘serious questions going to the merits’—a
18 lesser showing than likelihood of success on the merits—then a preliminary
19 injunction may still issue if the balance of hardships tips *sharply* in the plaintiff’s
20 favor, and the other two *Winter* factors are satisfied.” *Immigrant Defenders Law*
21 *Center v. Noem*, 145 F.4th 972, 986 (9th Cir. 2025) (emphasis in original) (internal
22 quotation marks omitted). Under this approach, the four *Winter* elements are
23 “balanced, so that a stronger showing of one element may offset a weaker showing
24 of another.” *All. for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1131 (9th Cir. 2011).

25 ¹² *Id.* at ¶ 19, 25 and 26.

26 ¹³ *Id.* at ¶ 27.

27 ¹⁴ *Id.* at ¶ 28.

¹⁵ *Id.* at ¶ 29.

1 A TRO may be granted where there are “serious questions going to the merits’ and
2 a hardship balance ... tips sharply toward the plaintiff,” and so long as the other
3 *Winter* factors are met. *Id.* at 1132.

4 Here, this Court should issue a TRO because “immediate and irreparable
5 injury . . . or damage” is occurring and will continue in the absence of an order. Fed.
6 R. Civ. P. 65(b). Sahin has not received adequate prenatal care for her entire first
7 trimester, and most of the second. The lack of care quite literally and directly puts
8 Sahin’s life, and the life of her unborn child, in danger. This Court should order
9 Sahin’s immediate release under conditions suitable for a pregnant woman.

10 **I. Sahin will likely succeed on the merits, or at a minimum, Sahin
11 raises serious merits questions.**

12 In her § 2241 petition, Sahin raises claims that her detention violates Fifth
13 Amendment due process guarantees, the APA’s mandate that federal agencies
14 comply with existing regulations and policies, and ICE’s policies regarding the
15 detention of pregnant women. Sahin addresses the merits of these claims below:

16 **A. Sahin is likely to succeed on the merits of her claim that her
17 continued detention violates her Fifth Amendment right to due
18 process because ICE’s denial of medical care amounts to
19 punishment.**

20 The Fifth Amendment guarantees detainees are not denied medical care and
21 are not subject to conditions that “amount to punishment.” *Bell*, 441 U.S. at 535.
22 The federal government may not detain an individual and then deny that person
23 medical care through their deliberate indifference. *Charles*, 925 F.3d at 85.
24 Deliberate indifference “involves culpable recklessness, i.e., an act or a failure to act
25 that evinces a conscious disregard of a substantial risk of serious harm.” *Id.* at 87
26 (quoting *Cuoco v. Moritsugu*, 222 F.3d 99, 107) (2d Cir. 2000) (cleaned up).

27 Sahin is approximately 23 weeks pregnant, yet ICE has failed to provide
her with medical care.¹⁶ Since being in ICE custody, Sahin has been denied prenatal
care, she has not had any prenatal check-ups, professional evaluations, or medical

¹⁶ See Exs. 13, 14, 20, 21, 22, 24, 25, 26.

1 testing, despite being in her second trimester of pregnancy.¹⁷ A detailed anatomy
2 ultrasound should have been, but was not, performed between Sahin's 18th and
3 22nd week of gestation.¹⁸ The purpose of this ultrasound is to check the
4 development of fetal organs and body parts.¹⁹ During this scan, congenital
5 conditions can be detected.²⁰ The failure to provide Sahin with prenatal care
6 amounts to deliberate indifference that can lead to a serious risk to both Sahin and
7 the fetus. Sahin's case is exceptionally urgent as her pregnancy is high-risk and she

8  ²¹

9 In addition to failing to provide Sahin prenatal care, ICE has not
10 provided her proper nutrition. Sahin is Muslim and therefore does not eat pork.²²
11 Despite informing ICE that she requires a special diet, ICE has ignored her needs.²³
12 The stress of her continued detention and the inadequate nutrition being provided
13 to her has resulted in Sahin losing weight.²⁴ The failure to provide Sahin with
14 proper nutrition amounts to deliberate indifference that can lead to a serious risk to
15 both Sahin and her fetus.

16 It is likely that this Court will find that ICE is violating Sahin's Fifth
17 Amendment guarantees by refusing to provide Sahin with her medical and
18 nutritional needs. Sahin must be immediately released.

19 **B. Sahin is likely to succeed on the merits of her claim that ICE**
20 **violated its own regulations in continuing to detain her.**

21 ¹⁷ *Id.*

22 ¹⁸ *See* Ex. 4.

23 ¹⁹ *Id.*

24 ²⁰ *Id.*

25 ²¹ *See* Exs. 5, 10 at 3, 13, 26.

26 ²² Ex. 26.

27 ²³ *Id.*

²⁴ *Id.*

1 Under the Administrative Procedures Act (“APA”), a court must hold
2 unlawful and set aside agency action found to be “arbitrary, capricious, an abuse of
3 discretion, or otherwise not in accordance with law” or “without observance of
4 procedure required by law.” 5 U.S.C. § 706(2). An agency action is “arbitrary and
5 capricious if the agency has relied on factors which Congress has not intended it to
6 consider, entirely failed to consider an important aspect of the problem, offered an
7 explanation for its decision that runs counter to the evidence before the agency, or is
8 so implausible that it could not be ascribed to a difference in view or the product of
9 agency expertise.” *Motor Vehicles Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto.*
10 *Ins. Co.*, 463 U.S. 29, 43 (1983). Courts “defer to an agency’s determinations so long
11 as the agency ‘gives adequate reasons for its decisions, in the form of a satisfactory
12 explanation for its action including a rational connection between the facts found
13 and the choice made.” *Nat. Res. Def. Council, Inc. v. United States Env't Prot.*
14 *Agency*, 961 F.3d 160, 170 (2d Cir. 2020) (cleaned up).

15 ICE Directive 11032.4 applies to pregnant individuals detained in ICE
16 custody. The Directive prohibits the detention of pregnant individual, unless
17 “prohibited by law or exceptional circumstances exist.” *Id.* at ¶ 1. The policy clearly
18 defines the only exceptional circumstances in which ICE can detain a pregnant
19 individual—“(1) the individual poses national security concerns; or (2) the
20 individual poses an imminent risk of death, violence, or physical harm to any
21 individual.” *Id.* at ¶ 3.4.

22 ICE is required to follow its own regulations and directives, and this court
23 may review a detention decision for compliance with the regulations.

24 Because Sahin is pregnant, ICE’s own directive prohibits her detention
25 unless her release is prohibited by law or ICE has alleged extraordinary
26 circumstances to continue her detention. Because there is no evidence that
27 Respondents found Sahin’s release is prohibited by law and she is not a threat to
national security or any individual, ICE is violating its own regulations by
detaining Sahin. “It is a familiar rule of administrative law that an agency must
abide by its own regulations.” *Fort Stewart Schs. v. Fed. Lab. Rels. Auth.*, 495 U.S.

1 641, 654 (1990); *see also United States ex rel Accardi v. Shaughnessy*, 347 U.S. 260
2 (1954) (holding that government agencies are required to follow their own
3 regulations).

4 Recently, a court in the Western District of Louisiana found a pregnant ICE
5 detainee's continued detention was not consistent with the *Accardi* doctrine based
6 on Directive 11032.4. *De Leon v. Ladwig*, No. 6:25-cv-01884, 2026 WL 19095, at *8
7 (W.D. La. Jan. 2, 2026). Additionally, numerous courts have released re-detained
8 immigrants after finding that ICE failed to comply with applicable regulations. *See*
9 *e.g. Ghafouri v. Noem, et. al.*, No. 3:25-CV-02675-RBM-BLM, 2025 WL 3085726,
10 (S.D. Cal. Nov. 4, 2025); *Cesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 166 (W.D.N.Y.
11 2025); *You v. Nielsen*, 321 F. Supp. 3d 451,463 (S.D.N.Y. 2018); *Rombot v. Souza*,
12 296 F. Supp. 3d 383,387 (D. Mass. 2017); *Zhu v. Genalo*, No. 1:25-CV-06523 (JLR),
13 2025 WL 2452352, at *7-9 (S.D.N.Y. Aug. 26, 2025); *M.S.L. v. Bostock*, No. 6:25-CV-
14 01204-AA, 2025 WL 2430267, at *10-12 (D. Or. Aug. 21, 2025); *Escalante v. Noem*,
15 No. 9:25-CV-00182-MJT, 2025 WL 2491782, at *2-3 (E.D. Tex. July 18, 2025); *Hoac*
16 *v. Becerra*, No. 2:25-cv-01740-DC-JDP, 2025 WL 1993771, at *4 (E.D. Cal. July 16,
17 2025); *Liu*, 2025 WL 1696526, at *2; *M.Q. v. United States*, 2025 WL 965810, at *3,
18 *5 n.1 (S.D.N.Y. Mar. 31, 2025); *Rokhfirooz v. Larose*, No. 25-CV-2053-RSH-VET,
19 2025 WL 2646165, (S.D. Cal. Sept. 15, 2025).

20 Accordingly, this Court will likely find that Sahin's continued detention
21 violates the APA because it is arbitrary and capricious and not in accordance with
22 law.

23 **C. Sahin is likely to succeed on the merits of her claim that she is**
24 **entitled to the opportunity to seek release on bond under 8**
25 **U.S.C. § 1226(a).²⁵**

26 ²⁵ While this claim is meritorious, Sahin requests that this Court only order
27 relief in the form of a bond hearing if this Court finds that Sahin does not warrant
relief in the form of release on Claims One and Two.

1 When ICE detained Sahin on September 29, 2025, it indicated that she would
2 be “held in ICE custody without bond.”²⁶ This Court will likely find Sahin’s detention
3 without bond is a violation of her procedural due process rights because she is
4 guaranteed the opportunity to seek release on bond pursuant to 8 U.S.C. § 1226(a).
5 It is clear that Sahin is detained pursuant to section 1226(a), because ICE arrested
6 her nearly two years after she entered the United States without inspection. This
7 Court will likely find that she cannot be detained under 8 U.S.C. § 1225 or any other
8 detention authority. ICE conceded this position when it charged Sahin in the NTA
9 with being present in the United States without admission pursuant to section
10 212(a)(6)(A)(i) as opposed to charging her as “an arriving alien.”²⁷

11 “The overwhelming majority of district courts across the country, including
12 this Court, that have considered the government’s new statutory interpretation have
13 found it incorrect and unlawful.” *In re Alejandro Pueblas Rojas*, 2026 WL 125152, at
14 *2 (Nev. Jan. 16, 2026). Accordingly, this Court will likely order that Sahin receive a
15 bond hearing in immigration court or be released.

16 **II. Sahin continues to suffer irreparable harm absent injunctive relief.**

17 Sahin also meets the second factor: irreparable harm. “It is well established
18 that the deprivation of constitutional rights ‘unquestionably constitutes irreparable
19 injury.’” *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (quoting *Elrod v.*
20 *Burns*, 427 U.S. 347, 373 (1976)). Where the “alleged deprivation of a constitutional
21 right is involved, most courts hold that no further showing of irreparable injury is
22 necessary.” *Warsoldier v. Woodford*, 418 F.3d 989, 1001-02 (9th Cir. 2005) (quoting
23 11A Charles Alan Wright et al., *Federal Practice and Procedure*, § 2948.1 (2d ed.
24 2004)).

26 ²⁶ I-213 at 4.

27 ²⁷ Ex. 2.

1 Sahin easily meets this standard here. Unlawful detention itself “constitutes
2 extreme or very serious damage, and that damage is not compensable in damages.”
3 *Hernandez v. Sessions*, 872 F.3d 976, 999 (9th Cir. 2017) (internal citations
4 omitted). Sahin has been in custody for approximately four months.

5 In this case, however, the risk of irreparable harm is all the more clear
6 because Sahin’s continued confinement during her high-risk pregnancy without
7 proper medical care is placing her life and the life of her unborn child in danger.
8 ICE has failed to provide her with adequate prenatal treatment. Despite being told
9 on December 1 that she needed to be seen on a weekly basis for a period of six
10 weeks for prenatal monitoring, Sahin has not been seen by a physician since. Sahin
11 has not been examined by an obstetrician, nor has she received any prenatal genetic
12 testing or ultrasounds. Sahin finds herself 23 weeks pregnant and she does not have
13 any relevant information on her overall health, the health of her unborn child or the
14 vitality of her pregnancy. Physicians for Human Rights has also noted the lack of
15 medical care for pregnant women by ICE and the high number of miscarriages
16 experienced by ICE detainees.²⁸

17 Sahin is suffering from unmanaged and undiagnosed low blood pressure.
18 Sahin has not received a medical explanation for the cause of her blood pressure
19 issue, nor is she receiving medication to ensure that it remains at a healthy rate.
20 ICE has failed to provide her with adequate care at every turn. While in custody,
21 Sahin has not received prenatal vitamins or a diet commiserate with the needs of a
22 pregnant woman²⁹ (lean protein, fresh fruits and vegetables, and whole grains). The
23 harm that Sahin continues to experience while in ICE detention are irreparable,
24 and every day spent in detention multiplies the risks to her and her unborn child’s
25 health.

26 ²⁸ ECF No. 3-1.

27 ²⁹ John Hopkins Medicine, *Nutrition During Pregnancy*,
<https://www.hopkinsmedicine.org/health/wellness-and-prevention/nutrition-during-pregnancy> (last visited January 21, 2026).

1 **III. The balance of hardships and the public interest weigh heavily in**
2 **Sahin's favor.**

3 The final two factors for a TRO—the balance of hardships and public interest—
4 “merge when the Government is the opposing party.” *Nken v. Holder*, 556 U.S.
5 418,435 (2009). That balance tips decidedly in Sahin's favor.

6 The government “cannot reasonably assert that it is harmed in any legally
7 cognizable sense” by being compelled to follow the law. *Zepeda v. I.N.S.*, 753 F.2d
8 719, 727 (9th Cir. 1983). Moreover, it is always in the public interest to prevent
9 violations of the U.S. Constitution and ensure the rule of law. *See Nken*, 556 U.S. at
10 436 (describing public interest in preventing noncitizens “from being wrongfully
11 removed, particularly to countries where they are likely to face substantial harm”);
12 *Moreno Galvez v. Cuccinelli*, 387 F. Supp. 3d 1208, 1218 (W.D. Wash. 2019) (when
13 government's treatment “is inconsistent with federal law, . . . the balance of
14 hardships and public interest factors weigh in favor of a preliminary injunction.”).

15 Sahin also faces weighty hardships: her health and the health and safety of
16 her unborn child. The balance of equities thus favors preventing the violation of
17 “requirements of federal law,” *Arizona Dream Act Coal. v. Brewer*, 757 F.3d 1053,
18 1069 (9th Cir. 2014), by granting emergency relief to protect against unlawful
19 detention.

20 **CONCLUSION**

21 For the foregoing reasons, Sahin requests that this Court hold a hearing on
22 this motion and issue a temporary restraining order on an emergency basis given
23 the urgency of the risks presented to Sahin and her unborn child. Furthermore,
24 while Claim Three is meritorious, Sahin requests that this court only grant relief on
25 that claim if that Court determines that relief is not warranted on Claims One and
26 Two. Release is the most appropriate relief in these circumstances, and therefore
27 Sahin hopes to avoid unnecessarily having to seek and pay for release on bond.

1 Dated January 23, 2026.

2 Respectfully submitted,

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4 Rene L. Valladares
5 Federal Public Defender

6 */s/ Megan Hopper-Rebegea*

7 Megan Hopper-Rebegea
8 Assistant Federal Public Defender

9 */s/ Laura Barrera*

10 Laura Barrera
11 Assistant Federal Public Defender
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1 **DECLARATION IN SUPPORT OF EMERGENCY MOTION**

2 1. My name is Megan Hopper-Rebegea. I am an Assistant Federal Public
3 Defender in the district of Nevada. I am one of the attorneys representing Emine
4 Sahin in this case.

5 2. Ms. Sahin has been in custody since September 2025, in violation of
6 her constitutional rights and the Government's own detention policy for pregnant
7 women, as outlined in the petition (ECF No. 2).

8 3. This case constitutes an emergency because the DHS, ICE, and/or its
9 acting agents, and/or contractors have failed to provided Ms. Sahin with any
10 prenatal care to the detriment of her health and the health of her unborn child, as
11 outlined in the petition (ECF No. 2) and instant motion (ECF No. 9).

12 4. My office number is 702-388-6577. My address is 411 E. Bonneville
13 Ave., Ste. 250, Las Vegas, Nevada 89101.

14 5. According to her notice of appearance (ECF No.9), Attorney for
15 Respondents is Virginia Tomova. Her number is 702-388-6336 and her address is
16 501 Las Vegas Blvd. So., Suite 1100, Las Vegas, Nevada 89101. AUSA Summer
17 Johnson is also named as the attorney for the United States Attorney for the
18 District of Nevada.

19 6. Prior to the filing of the petition, AFPD Keisha Matthews, reached out
20 to AUSA Tony Lopez by phone on January 21, and left a voicemail message on his
21 office number. On the same day, AFPD Matthews followed up with an email to
22 AUSAs Lopez and Summer Johnson requesting a telephonic meet-and-confer to
23 discuss the circumstances surrounding Ms. Sahin's continued detention and the
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1 necessity of an emergency TRO motion in accordance with LR 7-4 and LR IA 1-3(f).
2 AUSA Johnson responded to the email and requested additional information to
3 inform the call. On January 22, AFPD Matthews and AUSA Johnson engaged in a
4 meet-and-confer over the phone in an effort to resolve the dispute over Ms. Sahin's
5 continued detention. Unfortunately, the parties were unable to resolve the issue
6 absent Court action.
7

8 I declare under penalty of perjury that the forgoing statement is true. This
9 Declaration is presented in accordance with LR 7-4. This statement was executed in
10 Las Vegas, Nevada, on January 23, 2026.
11

12 /s/ Megan Hopper-Rebega
13 Megan Hopper-Rebegea
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on January 23, 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:

Summer Johnson Assistant United States Attorney District of Nevada 501 S. Las Vegas Blvd. Las Vegas, NV 89101 Email: Summer.Johnson@usdoj.gov	Sigal Chattah First Assistant, US Attorney for the District of Nevada 501 S. Las Vegas Blvd. Las Vegas, NV 89101 Email: Sigal.Chattah@usdoj.gov
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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 person:

Reggie Rader Henderson Chief of Police 223 Lead St. Henderson, NV 89105Sahin	Todd Lyons 500 12th St SW Washington, DC 20536
Pam Bondi Attorney General U.S. Department of Justice 950 Pennsylvania Ave, NW, Washington, DC, 20530	Michael Bernanke Salt Lake City ICE Field Office Director 2975 Decker Lake Drive, Ste 100 West Valley City, UT 841179-6096
Kristi Noem Secretary of the Department of Homeland Security 2707 Martin Luther King Jr. Ave SE, Washington, DC 20528	Virginia Tomova DOJ-OUSA District of Nevada 501 S. Las Vegas Blvd. Las Vegas, NV 89101 Email: Virginia.Tomova@usdoj.gov

/s/ Victoria Lenzi

 An Employee of the
 Federal Public Defender