

1 Edita Ghushchyan, Esq.
2 Managing Attorney
3 International Institute of Los Angeles
4 3845 Selig Place
5 Los Angeles, CA 90031-3143
6 eghushchyan@iilosangeles.org
7 (323) 476-0654

8 Counsel for Petitioner

9
10 UNITED STATES DISTRICT COURT
11 SOUTERN DISTRICT OF CALIFORNIA
12

13 ALVARD NERSISYAN,

14 Petitioner,

15 v.

16 TODD BLANCHE, in his official capacity as
17 Attorney General of the United States; U.S.
18 Immigration & Customs Enforcement;
19 TODD LYONS, in his official capacity as
20 Acting Director of U.S. Immigration and
21 Customs Enforcement; MARKWAYNE
22 MULLIN, in his official capacity as U.S.
23 Secretary of Homeland Security; DANIEL
24 A. BRIGHTMAN, Director, San Diego Field
25 Office, Immigration and Customs
26 Enforcement, Enforcement and Removal
27 Operations; JEREMY CASEY, Warden,
28 Imperial Regional Detention Center

Respondents.

Case No. **'26CV3453 BAS BJW**

**VERIFIED PETITION FOR
WRIT OF HABEAS CORPUS**



I. INTRODUCTION

1. This petition challenges Petitioner's unlawful prolonged detention, which violates the Fifth Amendment's guarantees of substantive and procedural due process. Petitioner seeks immediate release from detention.
2. Petitioner, a native of Armenia, has been detained for over 540 days since December 14, 2024. She is detained pursuant to 8 U.S.C 1225(b)(1) as an applicant seeking admission who was subject to expedited removal prior to being placed in removal proceedings.
3. The facts underlying both causes of action are straightforward. Petitioner has remained in immigration detention for more than seventeen months despite serious and worsening medical conditions, including diagnosed heart failure and a growing neck mass for which imaging has raised concern for lymphoma. She has repeatedly sought care, but Respondents have failed to provide timely diagnostic testing, adequate treatment, meaningful language access, or humane conditions of confinement. At the same time, Petitioner has no criminal history, has passed her credible fear interview, and has submitted multiple parole requests through counsel without response.
4. Meanwhile, publicly available evidence demonstrates that Immigration and Custody Enforcement ("ICE") possesses both lawful alternatives to detention and explicit authority under the Immigration and Nationality Act

1 to release noncitizens classified as applicants for admission, yet it has
2 declined to exercise that authority here. And even if Executive Office of
3 Immigration Review (“EOIR”) were deemed to have jurisdiction over the
4 custody issue, it would not provide the neutral process due process requires.
5 Respondents’ refusal to meaningfully account for Petitioner’s medical
6 conditions, together with the extraordinary humanitarian circumstances
7 underlying her parole requests, renders her continued detention punitive in
8 practical effect and underscores the inadequacy of the existing custody
9 review process.
10
11
12

13 **II. PARTIES**

- 14
- 15 5. Petitioner ALVARD NERSISYAN is a fifty-six-year-old Armenian national
16 who has been detained since her entry into the United States on December
17 14, 2024. She is currently held at the Imperial Regional Detention Facility.
18
- 19 6. Respondent TODD BLANCHE is sued in his official capacity as Attorney
20 General of the United States. As Attorney General, Respondent TODD
21 BLANCHE oversees the immigration court system, including the
22 immigration judges who conduct removal proceedings and bond hearings as
23 his designees, and is responsible for the administration of immigration laws
24 pursuant to 8 U.S.C. § 1103(g). He is legally responsible for administering
25
26
27
28

1 Petitioner's removal and bond proceedings, and as such, he is a legal
2 custodian of Petitioner.
3

4 7. Respondent TODD LYONS is sued in his official capacity as Acting
5 Director of ICE. As Acting Director of ICE, Respondent TODD LYONS is
6 a legal custodian of Petitioner.
7

8 8. Respondent MARK WAYNE MULLIN is sued in his official capacity as
9 Secretary of Homeland Security. As the head of the Department of
10 Homeland Security ("DHS"), the agency tasked with enforcing immigration
11 laws, Respondent MARK WAYNE MULLIN is Petitioner's ultimate legal
12 custodian.
13

14 9. Respondent DANIEL A. BRIGHTMAN is sued in his official capacity as
15 Director of the San Diego Field Office of ICE's Enforcement and Removal
16 Operations division. As Director of the San Diego Field Office, Respondent
17 DANIEL A. BRIGHTMAN is the custodian of all persons held at the ICE
18 facilities within the San Diego Field Office. He is Petitioner's immediate
19 custodian and is responsible for Petitioner's detention.
20
21

22 10. Respondent JEREMY CASEY is sued in his official capacity as Warden of
23 the Imperial Regional Detention Center in Calexico, California, where
24 Petitioner is detained. As Warden, Respondent JEREMY CASEY has
25 immediate physical custody of Petitioner.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

III. JURISDICTION AND VENUE

11. This Court has jurisdiction under the U.S. Constitution. U.S. Const. art. I § 9, cl. 2 (“The privilege of the Writ of Habeas Corpus shall not be suspended, unless when in Cases of Rebellion or Invasion the public Safety may require.”).

12. The Court also has jurisdiction under 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 1651 (the All Writs Act); and 28 U.S.C. § 2241 (habeas corpus).

13. This Court has additional remedial authority under 28 U.S.C. §§ 2201-02 (the Declaratory Judgment Act), to grant injunctive and declaratory relief.

14. Venue is proper in the Southern District of California under 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 giving rise to these claims occurred in this District.

15. Venue is additionally proper in accordance with 28 U.S.C. § 2241(d) because Petitioner is currently being detained at the Imperial Regional Detention Facility, a facility within the Southern District of California.

IV. STATEMENT OF FACTS

16. Petitioner, a fifty six year old native of Armenia, has been detained for more 540 days.

1 17. Petitioner entered the United States on December 14, 2024 and was
2 processed for an Expedited Removal/ Credible Fear Interview (CFI). Ex. B,
3 Form I-213.
4

5 18. Following a positive credible fear determination, Petitioner's expedited
6 removal order was vacated, and Petitioner was placed in removal
7 proceedings under 8 USC § 1229a after a Notice to Appear ("NTA"), dated
8 January 8, 2025 was filed with the EOIR. Ex. A, NTA dated January 8, 2025.
9

10 19. Petitioner filed an application for asylum on May 7, 2025, based on the
11 religious persecution she had suffered in Armenia.
12

13 20. On September 24, 2025, the Immigration Judge denied asylum and related
14 relief, expressly finding Petitioner credible. Significantly, the Immigration
15 Judge denied her asylum claim, ruling her barred under the "Securing the
16 Border" proclamation because she entered without inspection. Petitioner
17 timely appealed to the Board of Immigration Appeals ("BIA") on October
18 13, 2025. That appeal remains pending.
19

20 21. While the case was pending appeal with the BIA, Petitioner sought Custody
21 Redetermination with the EOIR. On December 9, 2025, the Court denied
22 her request for a bond hearing, asserting it lacked jurisdiction because she
23 was an "arriving alien" but citing 8 U.S.C. § 1225(b)(2)(A). The court also
24 stated that Petitioner was not a member of the eligible class under
25
26
27
28

1 Maldonado Bautista v. Santacruz, No. 5:25-CV-01873-SSS-BFM, ECF No.
2 82 at *2, 14-15 (C.D. Cal. Nov. 25, 2025. Ex. C, Order of the Immigration
3 Judge on Petitioner's Request for Custody Redetermination.
4

5 22. Throughout the year and a half of her detention, Respondents have
6 transferred Petitioner three times. She was initially held at the Otay Mesa
7 Detention Facility in California until approximately October 2025. She was
8 then moved to the San Luis Detention Facility in Arizona and subsequently
9 transferred back to California to the Imperial Regional Detention Facility
10 (hereinafter "Imperial") around February 2026.
11

12 23. Throughout her detention, Petitioner has endured serious deficiencies in
13 medical care, inadequate access to food, harassment, unsafe living
14 conditions, and prolonged isolation.
15

16 **A. Respondents have failed to provide Petitioner the urgent medical care**
17 **she needs.**
18

19 24. Petitioner has suffered from ongoing medical issues since the onset of her
20 detention, including hypertension, swelling in her lower extremities, a
21 growing mass on her neck, and gastrointestinal symptoms. See Exs. E,
22 Declaration of Dr. Hala Borno and Dr. Triveni DeFries regarding the
23 Medical Care of Alvard Nersisyan at the 7488 Calzada De La Fuente
24 (Detention Center) and F, Petitioner's Detention Medical Records. While in
25
26
27
28

1 detention, she was diagnosed with heart failure, and imaging has raised
2 concern for a lymphoproliferative disorder such as lymphoma. *Id.*
3

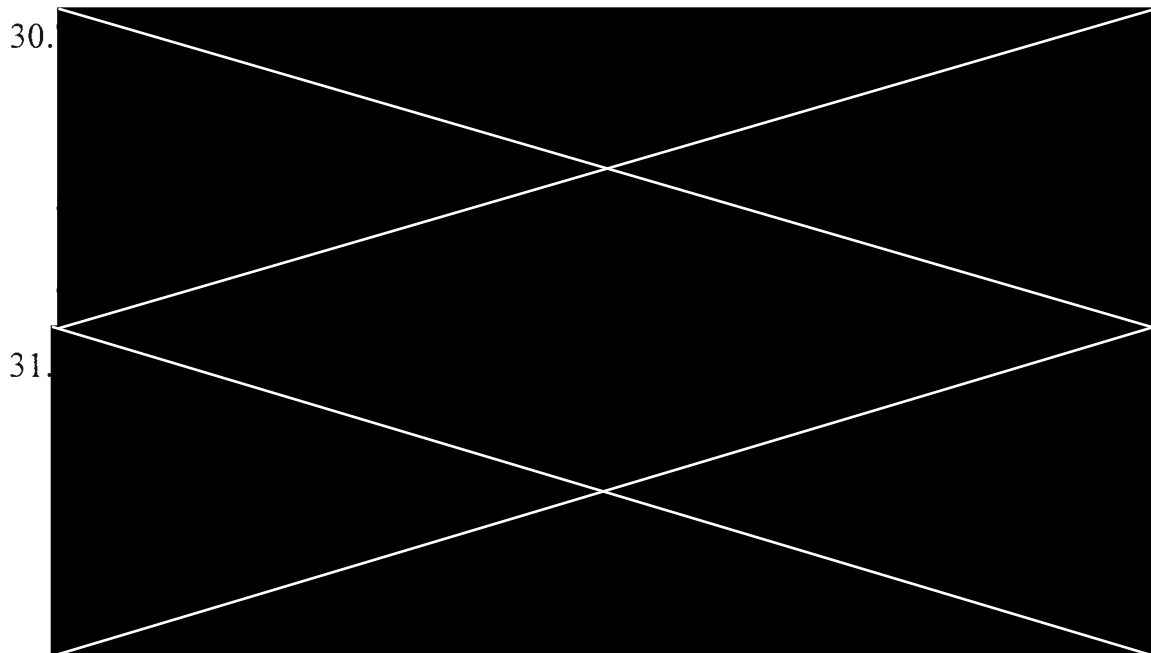
4 25. The medical records currently available to counsel span from October 2025
5 through March 2026. *Id.* The October 2025 report, however, reflects only
6 the earliest record presently available to counsel, not the first time Petitioner
7 reported these symptoms while in custody. *Id.*
8

9 26. The available medical records describe Petitioner as a “morbidly obese” 55-
10 to 56-year-old woman with hypertension, persistent and chronic headaches,
11 shortness of breath, and leg edema. *Id.* The records further reflect ongoing
12 fatigue and significant difficulty with movement. *Id.*
13
14

15 27. The available records also document a large mass on Petitioner’s neck, noted
16 as early as October 1, 2025, in a new-patient assessment conducted in Yuma,
17 Arizona. *Id.* This notation represents only the earliest documentation
18 available to counsel; it does not reflect the onset of the condition or the first
19 time Petitioner reported it while in custody.
20

21 28. At each recorded visit available to counsel, Petitioner raised concerns about
22 her neck mass and consistently reported that it had increased in size since
23 the beginning of her detention. *Id.* In one report, she estimated that the mass
24 had grown by approximately three sizes during her detention. *Id.*
25
26
27
28

1 29.Despite these repeated complaints and the documented enlargement of the
2 neck mass over time, Petitioner did not receive a CT scan until February 11,
3 2026, more than one year after her detention began. *Id.* That CT scan was
4 follow-up imaging undertaken in response to Petitioner’s longstanding
5 complaints regarding the neck mass.
6
7



19 32.A subsequent ultrasound dated February 17, 2026, again showed enlarged
20 lymph nodes and recommended further sampling. *Id.* Medical providers
21 documented that a biopsy was necessary to establish a definitive diagnosis.
22
23 *Id.*

24 33.Despite that recommendation, based on information and knowledge,
25 Petitioner has not received the biopsy. As of the date of this Petition, the
26 neck mass has remained present, and, according to Petitioner, has continued
27
28

1 to grow, for a significant portion of her detention without definitive
2 diagnostic follow-up or treatment.
3

4 34. In addition, a medical report dated February 17, 2026, signed by Julio Cesar
5 Martinez, diagnosed Petitioner with “chronic heart failure with preserved
6 ejection fraction,” a condition requiring further evaluation and treatment by
7 a cardiologist. *Id.*
8

9 35. In March 2026, medical staff informed Petitioner that she required a CT scan
10 of her head and below her neck, as well as a biopsy as she was suspected to
11 have lymphoma. *Id.* Despite this determination, no diagnostic testing was
12 scheduled for approximately two months.
13

14 36. On May 19, 2026, Petitioner was informed that she would be transported for
15 these procedures. The night before, she was transferred to the medical unit
16 to ensure that she remained fasting. During this transfer, her box of personal
17 belongings was misplaced.
18
19

20 37. The following morning, Petitioner was transported, still fasting, to an
21 outside medical provider. No interpreter was provided. She was presented
22 with documents she could not understand and after some time there learned
23 that her appointment would be canceled that day. She was then returned to
24 Imperial without receiving any medical evaluation or treatment.
25
26
27
28

1 38. Upon her return, Petitioner was instructed to obtain food from her housing
2 unit, but no food was available. By that time, she had been fasting for more
3 than twelve hours in anticipation of medical procedures. For a 56-year-old
4 woman with hypertension, going without food for that length of time caused
5 significant hunger and physical distress. The meal provided during transport,
6 which she had saved to eat upon her return to detention, was confiscated.
7 Medical staff later delivered the wrong food tray, which belonged to another
8 detainee. As a result, Petitioner received no lunch and was left to eat only
9 oatmeal purchased from commissary.
10
11
12

13 39. Petitioner's medications have been altered without explanation, including
14 the discontinuation of [REDACTED] medications on which she
15 previously relied. Despite her hypertension, her blood pressure is checked
16 only approximately every ten days.
17
18

19 40. Petitioner has submitted medical requests for approximately two months
20 without being seen by a provider. When she has seen a doctor, she has not
21 felt cared for. She has felt like she was treated as a criminal, although she
22 has never committed a crime.
23

24 41. She also describes blood draws as painful and humiliating because of the
25 hostile tone and demeanor of staff.
26
27
28

1 42. As of the date of this Petition, Respondents have still not provided Petitioner
2 with the CT scans and biopsy recommended more than two months ago. As
3 a result, Petitioner has been forced to endure the ongoing fear and distress
4 of knowing that she may have cancer, while also knowing that she is not
5 receiving the diagnostic care and treatment she urgently needs as the
6 suspected disease may continue to progress.
7

8
9 **B. Respondents have subjected Petitioner to harassment, isolation, and**
10 **unsafe conditions.**
11

12 43. In February 2026, six detainees mocked her and pulled her hair in the
13 presence of an officer who did not intervene.
14

15 44. On another occasion, a detainee blocked Petitioner's access to the bathroom
16 while an officer observed without taking any action.
17

18 45. Petitioner also reports persistent nighttime noise from other detainees
19 speaking loudly, which interferes with her ability to sleep. Officers do not
20 intervene.
21

22 46. Petitioner reports that there are no other Armenian detainees at the facility
23 and that she has felt completely isolated throughout her seventeen-month
24 detention. She became distressed and cried when attempting to report this
25 isolation she has been feeling for the last 540 days.
26
27
28

1 47. Although Petitioner has repeatedly requested an interpreter, none has been
2 provided. A supervisor informed her that she would be scheduled for a
3 meeting with an interpreter, but no such meeting has occurred. As a result,
4 Petitioner has been unable to communicate effectively with staff, present
5 grievances to a supervisor, or meaningfully raise concerns regarding her
6 medical care, safety, or treatment.
7
8

9 **C. Respondents have not provided adequate living conditions for**
10 **Petitioner.**
11

12 48. Because of her medical conditions, Petitioner is prescribed a special diet,
13 and her meals must be delivered directly from the cafeteria. She cannot eat
14 the standard unit meals. She is therefore entirely dependent on officers to
15 deliver her food.
16

17 49. Petitioner reports repeated incidents in which officers delayed, mishandled,
18 or failed altogether to deliver her meals. At times, meals arrived incomplete,
19 were delivered with hostility, or did not arrive at all, leaving her hungry and
20 without any dependable alternative source of nutrition. On other occasions,
21 the fruit provided was rotten. Even when meals were delivered as intended,
22 they were monotonous, dry, and nutritionally inadequate. Petitioner reports
23 that the food often consists of little more than rice and steamed carrots,
24 offering minimal variety and insufficient nourishment. At prior facilities,
25
26
27
28

1 she received no fruit for more than one year and two months, and she only
2 recently began receiving fruit at Imperial. Petitioner further reports that
3 many of her gastrointestinal problems developed only after she entered
4 detention.
5

6 50. Petitioner reports that the facility water makes her ill, yet bottled water and
7 soda costs approximately \$3 per bottle.
8

9 51. Petitioner sleeps on a thin mattress placed directly on a metal surface and is
10 not provided a pillow, causing body pain and discomfort. She wakes
11 multiple times each night and is awakened by lights at approximately 5:00
12 a.m. The housing unit has no clock, and the environment is consistently
13 noisy. As a result of these conditions, Petitioner suffers from exhaustion,
14 worsening physical and mental health, chronic pain, sleep deprivation, and
15 significant emotional distress.
16
17

18 52. Petitioner's prolonged isolation, lack of linguistic and cultural community,
19 and inability to access adequate medical and psychological care have
20 substantially worsened her condition.
21
22

23 **D. Respondents have been aware of Petitioner's medical conditions and**
24 **have failed to provide her with any due process rights.**
25
26
27
28

1 53. Through counsel, Petitioner submitted three separate parole requests to ICE
2 on January 28, 2025; December 3, 2025; and February 23, 2026.
3 Respondents have not responded to any of these requests.
4

5 **E. Medical Professionals who have reviewed the facts contained herein and**
6 **the available medical records have raised serious concerns about**
7 **Petitioner’s conditions and her care in continued detention.**
8

9 54. The available medical records and Subsections A-D of the statement of facts
10 included in this petition were reviewed by two physicians: Dr. Hala Borno,
11 a board certified medical oncologist licensed in California, an Associate
12 Professor at the University of California San Francisco with clinical practice
13 since 2013 and extensive experience in oncology care and medical education,
14 and Dr. Triveni DeFries, a California licensed, board certified physician in
15 Internal Medicine and Addiction Medicine with over 10 years of primary
16 care experience treating heart failure, cancer, and complex conditions in
17 diverse patient populations. Together, they provided their professional
18 opinion regarding Petitioner’s condition, the care she has received, her
19 medical needs, and the consequences of continued lack of proper care and
20 detention. Ex. E.
21
22
23
24

25 55. The reviewing physicians concluded that “medical care provided during
26 Petitioner’s detention has fallen below accepted standards of care” (Ex. E ¶
27
28

12), noting that “Diagnostic evaluation of her enlarging neck mass was substantially delayed,” with “approximately one year elapsing between the initial request for advanced imaging and completion of the CT scan” (Ex. E ¶¶ 12, 22), and that “recommended urgent biopsy procedures were not completed” despite findings “highly suggestive of lymphoma” and airway compression (Ex. E ¶¶ 12, 22). They further observed that “multiple specialty referrals remain outstanding” (Ex. E ¶¶ 12, 24), that “cardiologist-recommended... workup... remains incomplete” (Ex. E ¶¶ 11, 23), and that “repeated transfers between correctional facilities have fragmented continuity of care,” “resulting in significant delays in necessary diagnostic evaluation and treatment” (Ex. E ¶¶ 12, 25). The physicians emphasized that this “failure to obtain a timely biopsy... resulted in a prolonged delay in the diagnosis and management of a potentially life-threatening condition” (Ex. E ¶ 22(b)) and “represents a significant departure from accepted standards of medical care” (Ex. E ¶¶ 22(c), 28), which has “exposed Petitioner to foreseeable risks... progression of an undiagnosed malignancy, worsening airway obstruction, worsening hypercalcemia... avoidable morbidity, and death” (Ex. E ¶¶ 22(c), 28). Accordingly, they recommend “urgent biopsy of the cervical lymph nodes and thyroid nodules to establish a definitive diagnosis,” “expedited completion of the outstanding cardiology workup,”

1 and “prompt completion of all pending specialty consultations and
2 recommended diagnostic studies” (Ex. E ¶ 13(1)–(3)), including that “Core
3 needle biopsy or excisional biopsy should be performed without further
4 delay” and that “Transthoracic echocardiography, nuclear stress test, carotid
5 ultrasound, and lower extremity duplex should be completed” (Ex. E ¶¶
6 26(a), 26(c)).
7
8

9 56. The physicians warn that continued detention without proper medical care
10 places Petitioner at severe and escalating risk. They state that “further delay
11 places Petitioner at substantial risk of progression of an undiagnosed
12 malignancy (cancer), worsening hypercalcemia, airway compromise...
13 cardiovascular decompensation... preventable hospitalization, permanent
14 disability, and death” (Ex. E ¶ 13). They further explain that failure to
15 provide recommended care risks “disease progression and death from
16 undiagnosed cancer,” “acute airway compromise” from the enlarging
17 thyroid mass, “cardiovascular decompensation” due to incomplete heart
18 failure evaluation, “vascular compromise” from compression of cervical
19 vessels, and “malignant hypercalcemia” causing life threatening
20 complications (Ex. E ¶ 27(a)–(e)). Overall, they conclude that detention
21 conditions have “exposed her to foreseeable risks of disease progression,
22
23
24
25
26
27
28

1 preventable complications, permanent disability, and death,” making urgent
2 intervention necessary (Ex. E ¶ 28).

4 CAUSES OF ACTION

5 **FIRST CAUSE OF ACTION**

6 **Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241** 7 **and the Fifth Amendment (Continued Civil Detention Has Become** 8 **Punitive and Unconstitutional; Immediate Release Required)**

9
10 57. Petitioner realleges and incorporates by reference all preceding paragraphs
11 as though fully set forth herein.

12
13 58. Because Petitioner is a civil immigration detainee, and not a convicted
14 prisoner, her claim arises under the Fifth Amendment’s Due Process Clause,
15 informed by the standards developed under the Fourteenth Amendment for
16 other non-convicted detainees. *Bell v. Wolfish*, 441 U.S. 520, 534–35 (1979);
17 *Pierce v. County of Orange*, 526 F.3d 1190, 1205 (9th Cir. 2008).

18
19 59. The Fifth and Fourteenth Amendments protect a non-convicted detainee
20 from punishment prior to an adjudication of guilt. *Bell*, 441 U.S. at 535. That
21 protection is more protective than the Eighth Amendment standard
22 applicable to convicted prisoners. *Pierce*, 526 F.3d at 1205.

23
24
25 60. To evaluate whether a condition of detention violates due process, the Court
26 asks whether the challenged condition or treatment amounts to punishment.
27 *Bell*, 441 U.S. at 535. In the absence of an express intent to punish,
28

1 punishment may be inferred where a restriction or condition is not
2 reasonably related to a legitimate governmental objective or is excessive in
3 relation to that objective. *Bell*, 441 U.S. at 538–39; *Pierce*, 526 F.3d at 1205;
4 *Demery v. Arpaio*, 378 F.3d 1020, 1028–30 (9th Cir. 2004).

61. A condition of confinement violates due process where it imposes harm that
7 significantly exceeds, or is independent of, the inherent discomforts of
8 confinement and lacks a reasonable relation to a legitimate nonpunitive
9 purpose. *Demery*, 378 F.3d at 1030. Under the Due Process Clause, the
10 Court makes an objective assessment whether there is a reasonable
11 relationship between the government’s conduct and a legitimate purpose.
12 *Kingsley v. Hendrickson*, 576 U.S. 389, 398 (2015).

16 62. Civil detainees are entitled to more considerate treatment than those held
17 pursuant to criminal process. *Youngberg v. Romeo*, 457 U.S. 307, 321–22
18 (1982); *Jones v. Blanas*, 393 F.3d 918, 931–33 (9th Cir. 2004). The Ninth
19 Circuit has emphasized that civil detainees may not be subjected to
20 conditions that are identical to, similar to, or more restrictive than those
21 faced by criminal detainees absent adequate, nonpunitive justification. *Jones*,
22 393 F.3d at 932–33.

25 63. Due process further requires that the nature and duration of confinement
26 bear some reasonable relation to the purpose for which the individual is
27
28

1 detained. *Jackson v. Indiana*, 406 U.S. 715, 738 (1972). Although courts
2 ordinarily defer to correctional officials on matters of security and
3 institutional management, such deference is not unlimited, and the relevant
4 inquiry remains whether officials could reasonably believe that the
5 challenged policies or practices advance a legitimate governmental objective.
6 *Bell*, 441 U.S. at 540 n.23, 546; *Valdez v. Rosenbaum*, 302 F.3d 1039, 1045–
7 46 (9th Cir. 2002).

10 64. Courts have identified only two legitimate purposes for immigration
11 detention: mitigating flight risk pending removal and preventing danger to
12 the community. *See Zadvydas*, 533 U.S. at 690-91; *see also Demore v. Kim*,
13 538 U.S. 510 at 519–20, 527–28, 531 (2003). But if a person cannot actually
14 be removed, “preventing flight” is a “weak or nonexistent” justification. *See*
15 *Zadvydas*, 533 U.S. at 690. Detention for community safety, in turn, is only
16 permissible “when limited to specially dangerous individuals and subject to
17 strong procedural safeguards.” *Zadvydas*, 533 U.S. at 691.

21 65. The facts alleged herein support the inference that Respondents’ continued
22 detention of Petitioner is punitive in purpose and operation. Maintaining a
23 civil detainee in prolonged physical suffering, while failing to provide
24 necessary diagnostic care for serious and potentially life-threatening
25 conditions, is not consistent with the limited regulatory purposes of civil
26
27
28

1 immigration detention. *Bell*, 441 U.S. at 538–39; *Demery*, 378 F.3d at 1028–
2 30.
3

4 66.As alleged above, Petitioner has suffered from serious and worsening
5 medical conditions throughout her detention, including hypertension,
6 swelling in her lower extremities, gastrointestinal symptoms, a growing
7 neck mass, and heart failure diagnosed while in detention. Imaging has
8 raised concern for a lymphoproliferative disorder such as lymphoma.
9 Despite the length and seriousness of these conditions, Respondents have
10 failed to provide constitutionally adequate diagnostic evaluation and
11 treatment.
12
13

14 67.Petitioner has lived for a substantial portion of her detention with a growing
15 neck mass. She repeatedly reported that it was enlarging. Although the
16 February 11, 2026 CT scan was follow-up imaging undertaken in response
17 to those longstanding complaints, it did not occur until more than one year
18 after detention began. That CT scan revealed diffuse, multistation cervical
19 lymphadenopathy suggestive of a lymphoproliferative disorder such as
20 lymphoma and documented a large multinodular thyroid lobe causing mass
21 effect on adjacent structures. A subsequent ultrasound again showed
22 enlarged lymph nodes and recommended further sampling. Medical
23 providers documented that a biopsy was necessary to establish a definitive
24
25
26
27
28

1 diagnosis. Yet, as of the date of this Petition, Respondents still have not
2 ensured that the biopsy has been performed.
3

4 68. Respondents have also failed to provide other recommended diagnostic care
5 and follow-up. Petitioner has therefore been forced to endure the fear and
6 distress of knowing that she may have cancer while also knowing that she is
7 not receiving the diagnostic care and treatment necessary to determine the
8 nature of her condition and prevent further deterioration.
9

10 69. Respondents' failures extend beyond diagnostic delay. As alleged above,
11 Petitioner's medications have been changed without explanation; her
12 hypertension and cardiac condition have not been adequately monitored; she
13 has submitted repeated medical requests without timely access to a provider;
14 and she has received no meaningful psychological care despite ongoing
15 distress. She has also repeatedly requested an interpreter and has not been
16 provided one, including in connection with outside medical care, leaving her
17 unable to meaningfully communicate about treatment, consent, safety, or
18 grievances.
19

20 70. Petitioner's detention conditions have compounded and exacerbated these
21 medical harms. Because she is on a special diet, she is entirely dependent on
22 officers to deliver medically appropriate meals. Yet officers have delayed,
23 mishandled, or failed to deliver those meals; provided incomplete meals; and
24
25
26
27
28

1 at times left Petitioner hungry without any reliable alternative source of
2 nutrition. The food provided has often been repetitive, dry, nutritionally
3 deficient, and at times spoiled. Petitioner's gastrointestinal symptoms began
4 during detention.
5

6
7 71. Petitioner's sleeping conditions likewise aggravate her pain and illness. She
8 sleeps on a thin mattress placed directly on metal and is not provided a
9 pillow. Given her age, obesity, hypertension, chronic heart failure, and neck
10 mass, sleeping under such conditions is especially painful and, at times,
11 unbearable. Her rest is further disrupted by persistent noise, repeated
12 nighttime awakenings, and early morning lights.
13

14
15 72. The harms Petitioner suffers significantly exceed the inherent discomforts
16 of confinement. They are not limited to ordinary inconvenience, discomfort,
17 or the basic restrictions incident to civil immigration detention. Rather, they
18 include prolonged deprivation of necessary diagnostic care for a potentially
19 malignant and progressively enlarging neck mass; inadequate attention to
20 diagnosed heart failure and hypertension; medically harmful barriers to food,
21 sleep, and communication; and the cumulative worsening of Petitioner's
22 physical and mental condition.
23
24

25
26 73. Respondents have long been on notice of Petitioner's serious and worsening
27 medical conditions. Petitioner repeatedly reported her symptoms while in
28

1 custody, her detention medical records document chronic and escalating
2 health problems, and counsel submitted multiple parole requests identifying
3 the severity of her condition. Yet Respondents have continued to detain her
4 without ensuring adequate medical care.
5

6 74. At all relevant times, Respondents have possessed authority to release
7
8 Petitioner from custody through parole under 8 U.S.C. § 1182(d)(5)(A),
9 which authorizes the parole, on a case-by-case basis, of an applicant for
10 admission for “urgent humanitarian reasons” or “significant public benefit.”
11
12 Petitioner’s serious and worsening medical conditions, including diagnosed
13 heart failure, a growing neck mass with imaging suggestive of a
14 lymphoproliferative disorder such as lymphoma, and the prolonged failure
15 to provide necessary diagnostic testing and treatment, plainly constitute
16 urgent humanitarian circumstances supporting release.
17

18 75. Through counsel, Petitioner submitted three separate parole requests to ICE
19 on January 28, 2025; December 3, 2025; and February 23, 2026.
20
21 Respondents ignored each of them. Their refusal to release Petitioner despite
22 repeated notice of her deteriorating condition, and despite their clear
23 statutory authority to parole her on humanitarian grounds, further supports
24 the inference that her continued detention is punitive and coercive rather
25
26
27
28

1 than reasonably related to a legitimate civil objective, and reflects deliberate
2 disregard of the grave harms she faces in custody.
3

4 76.The broader policy context further supports the inference that Petitioner’s
5 continued detention is punitive and coercive rather than merely regulatory.
6 Public reporting has described the Trump administration’s immigration
7 agenda as embracing mass deportation, expanded removals without ordinary
8 process, and detention practices designed to pressure some noncitizens to
9 give up their claims and accept removal. Ex. M. The same reporting
10 documents rhetoric portraying immigrants as “poisoning the blood” of the
11 country and as coming from “insane asylums.” Against that backdrop,
12 Respondents’ refusal to release Petitioner despite notice of her serious
13 medical deterioration and despite available alternatives to detention further
14 supports the inference that her continued detention is being used punitively
15 and coercively, rather than to serve a legitimate civil objective. Id.
16
17
18
19

20 77.At the same time, public reporting shows that detention conditions and
21 release practices are pushing detainees to give up and leave. NBC News
22 reported that detained immigrants denied bond were “losing hope” and “self-
23 deporting,” and described detention and resulting physical and emotional
24 deterioration as breaking detainees who previously had not considered
25 abandoning their cases. Ex. I. Stateline likewise reported that voluntary
26
27
28

1 departures have sharply increased and that advocates and analysts linked that
2 increase to detention without bond and “dire” detention conditions that make
3 immigrants feel that departure is their best option even when they may have
4 a legal right to remain. Ex. J. The Marshall Project similarly reported that
5 poor food, inadequate medical care, unsanitary housing, ignored due process
6 concerns, and alleged misuse of solitary confinement were being described
7 by detainees and advocates as pressures pushing immigrants to abandon
8 their claims and “voluntarily” depart. Ex. K.

12 78. Even if Respondents disclaim punitive intent, Petitioner’s continued
13 detention and the conditions of her confinement violate due process because
14 they are not reasonably related to a legitimate governmental objective and
15 are excessive in relation to any such objective. *Bell*, 441 U.S. at 538–39;
16 *Pierce*, 526 F.3d at 1205; *Kingsley*, 576 U.S. at 398.

19 79. In the civil immigration context, detention is justified only by narrow
20 regulatory interests, principally ensuring appearance for proceedings and,
21 where applicable, protecting the community from danger. *Hernandez v.*
22 *Sessions*, 872 F.3d 976, 991–96 (9th Cir. 2017). Detention is not justified as
23 punishment. *Bell*, 441 U.S. at 535.

25 80. Respondents cannot justify Petitioner’s continued physical detention as
26 necessary to ensure compliance with immigration proceedings or to mitigate
27
28

1 any risk of nonappearance. ICE has long used alternatives to detention to
2 supervise noncitizens released from custody through telephonic reporting,
3 GPS monitoring, the SmartLINK mobile application, and related reporting
4 requirements, all designed to permit noncitizens to remain in the community
5 while their cases proceed. Ex. L.
6
7

8 81.Although the government is not always required to use the least restrictive
9 means, the existence of established alternatives to detention underscores that
10 continued detention of this medically vulnerable Petitioner is excessive in
11 relation to the government’s asserted regulatory interests, particularly where
12 Respondents have readily available means to supervise her outside of
13 custody while she pursues her immigration case and obtains urgently needed
14 medical care. *Bell*, 441 U.S. at 538–39; *Valdez*, 302 F.3d at 1045–46;
15 *Hernandez*, 872 F.3d at 991–96.
16
17
18

19 82.Nor are the harms inflicted on Petitioner reasonably related to protecting the
20 community. Petitioner has no criminal history, and the prolonged failure to
21 provide diagnostic care for her enlarging neck mass, ensure a recommended
22 biopsy, adequately monitor her heart failure and hypertension, provide
23 medically appropriate food, ensure language access, or prevent chronic sleep
24 disruption serves no public-safety or appearance-related purpose. It imposes
25 additional and unnecessary harm.
26
27
28

1 83. After more than seventeen months of detention, during which Petitioner's
2 condition has worsened and critical diagnostic care remains outstanding, her
3 continued confinement no longer bears a reasonable relation to any
4 legitimate civil objective. *Jackson*, 406 U.S. at 738. Instead, it has become
5 excessive in relation to any asserted regulatory interest and therefore violates
6 substantive due process. *Bell*, 441 U.S. at 538–39; *Demery*, 378 F.3d at
7 1028–30.

8 84. Respondents may rely on *Fraihat v. U.S. Immigration & Customs*
9 *Enforcement*, 16 F.4th 613 (9th Cir. 2021), but *Fraihat* does not foreclose
10 relief here. *Fraihat* reversed a sweeping nationwide preliminary injunction
11 governing ICE's systemwide COVID-19 response across detention facilities
12 nationwide and imposing broad operational requirements on the agency. The
13 Ninth Circuit held that the plaintiffs had not made the clear showing
14 necessary to justify judicial intervention of that magnitude on the national
15 record before it. *Fraihat*, 16 F.4th at 635–45.

16 85. This case is fundamentally different. Petitioner does not seek a nationwide
17 structural injunction, systemwide detention standards, or court management
18 of ICE operations. She seeks only individualized habeas relief under 28
19 U.S.C. § 2241 based on her own medical record, her own prolonged neglect,
20 and the unconstitutional nature of her own continued detention. Unlike
21
22
23
24
25
26
27
28

1 *Fraihat*, this case does not challenge ICE policy in the abstract; it challenges
2 the lawfulness of continuing to detain this Petitioner after Respondents have
3 demonstrated over a prolonged period that they cannot or will not provide
4 constitutionally adequate care for her serious and worsening conditions.
5 Immediate release is the only effective remedy. The constitutional violation
6 here arises from the fact of Petitioner's continued detention under conditions
7 that Respondents have shown they cannot or will not remedy in a
8 constitutionally adequate manner. Lesser relief would be inadequate because
9 further delay would prolong the same unconstitutional confinement and the
10 same substantial risk of serious harm. Petitioner therefore seeks a writ of
11 habeas corpus ordering her immediate release from immigration detention,
12 under such reasonable conditions of supervision as the Court deems
13 appropriate.
14
15
16
17
18

19 **SECOND CAUSE OF ACTION**

20 **Violation of Fifth Amendment Procedural Due Process**

21 **Prolonged Detention, Futility of Immigration Court**

22 **Custody Review, and Custody Redetermination by This Court**

23
24 86. Petitioner realleges and incorporates by reference all preceding paragraphs
25 as though fully set forth herein.
26
27
28

1 87. Federal district courts retain habeas jurisdiction over constitutional claims
2 and questions of law arising from immigration detention, including claims
3 that the detention-review process itself is constitutionally defective. *Singh v.*
4 *Holder*, 638 F.3d 1196, 1202 (9th Cir. 2011); *Martinez v. Clark*, 124 F.4th
5 775, 783–84 (9th Cir. 2024). A recent decision from this District likewise
6 recognized that habeas jurisdiction extends to claims that the custody-review
7 process provided by the immigration system is legally and constitutionally
8 deficient. *Perez Velasquez v. Bondi*, No. 26-cv-01759-GPC-DDL, slip op.
9 at 4–6 (S.D. Cal. Apr. 16, 2026).

13 88. The Fifth Amendment guarantees a civil immigration detainee a meaningful
14 opportunity to seek release before a neutral decisionmaker. Because
15 immigration detention is civil rather than criminal, due process requires a
16 real and fair opportunity to contest continued confinement. *Bell*, 441 U.S. at
17 535, 538–39; *Hernandez*, 872 F.3d at 991–96. Courts evaluating prolonged
18 mandatory detention under 8 U.S.C. § 1225 have applied the factors set forth
19 in *Banda v. McAleenan*, 385 F. Supp. 3d 1099, 1117–20 (W.D. Wash. 2019):
20 the length of detention, the likely duration of future detention, the conditions
21 of detention, delays attributable to the detainee, delays attributable to the
22 government, and the likelihood of a final order of removal. *Yevhenii v.*
23
24
25
26
27
28

1 *Mullin*, No. 3:26-cv-02228-JES-MMP, slip op. at 8–13 (S.D. Cal. Apr. 30,
2 2026).

3
4 89. Petitioner's claim is not that she has already received and been denied a
5 constitutionally adequate custody hearing. Rather, her claim is that, under
6 present conditions, it would be futile and constitutionally inadequate to
7 require her to seek custody review through the immigration court because
8 the current DOJ and EOIR structure is not functioning as a neutral forum for
9 detention redeterminations.
10

11
12 90. The first Banda factor, the length of detention, strongly favors Petitioner.
13 She has now been detained for more than seventeen months. That period is
14 substantially longer than the detention periods that have triggered habeas
15 relief in recent immigration detention cases, including *Sadeqi v. LaRose*, No.
16 25-cv-2587-RSH-BJW, 2025 WL 3154520, at *1, *5–8 (S.D. Cal. Nov. 12,
17 2025) and *Yevhenii*, No. 3:26-cv-02228-JES-MMP, slip op. at 8–13.
18
19

20 91. The second Banda factor, the likely duration of future detention, also favors
21 Petitioner. Her detention is not near a predictable endpoint. She remains in
22 custody despite worsening medical conditions, despite repeated requests for
23 release through counsel, and despite the absence of any meaningful release
24 mechanism likely to function neutrally or promptly. If the Board of
25 Immigration Appeals dismisses her appeal, Petitioner intends to file a
26
27
28

1 petition for review and seek a stay of removal in the Ninth Circuit, which
2 would likely further extend the duration of her detention. Public reporting
3 reflected in Exs. N and O indicates that immigration judges have been
4 directed not to grant bond, and in many cases not to hold bond hearings, for
5 broad categories of detainees, making future detention likely to continue
6 absent judicial intervention. Petitioner has passed her credible-fear interview
7 and been found to have a credible fear of return. And despite more than
8 seventeen months of detention under the conditions described above, she has
9 chosen to remain in custody rather than abandon her case and self-deport.
10 That decision strongly underscores the seriousness of her fear of return.
11
12
13
14

15 92. The third Banda factor, the conditions of detention, weighs heavily in
16 Petitioner's favor. Her confinement has been especially severe because she
17 is medically vulnerable and has not received adequate care. She has been
18 left in custody with diagnosed heart failure, hypertension, an enlarging neck
19 mass with imaging suggestive of a lymphoproliferative disorder such as
20 lymphoma, the absence of a recommended biopsy, barriers to medically
21 appropriate food, lack of interpreter access, chronic sleep disruption, and
22 painful sleeping conditions that are especially difficult in light of her age,
23 obesity, cardiac disease, and neck mass. These conditions make her
24 detention far more burdensome than ordinary civil confinement and strongly
25
26
27
28

1 support prompt custody review. Cf. *Sadeqi*, No. 25-cv-2587-RSH-BJW, slip
2 op. at 5–7.
3

4 93. The fourth Banda factor, delays attributable to the detainee, does not weigh
5 against Petitioner. Nothing in the record indicates that she has prolonged her
6 detention through bad-faith litigation tactics or dilatory conduct. To the
7 contrary, she has sought medical care, repeatedly requested an interpreter,
8 and pursued release through counsel, including three parole requests.
9 Seeking protection from unconstitutional detention and attempting to obtain
10 care while in custody cannot fairly be characterized as detainee-caused delay.
11 Cf. *Yevhenii*, No. 3:26-cv-02228-JES-MMP, slip op. at 10–11.
12
13

14 94. The fifth Banda factor, delays in the removal proceedings caused by the
15 government, is unknown. On the present record, Petitioner does not rely on
16 any specific delay in her removal proceedings that can clearly be attributed
17 to the government. This factor is therefore neutral.
18
19

20 95. The sixth Banda factor, the likelihood of a final order of removal, does not
21 justify continued detention without neutral custody review. Even where
22 removal proceedings are ongoing, due process still requires meaningful
23 release review once detention becomes prolonged. *Sadeqi* granted habeas
24 relief to a petitioner detained under 8 U.S.C. § 1225 while removal
25 proceedings remained pending. See *Sadeqi*, No. 25-cv-2587-RSH-BJW, slip
26
27
28

1 op. at 5–7. The relevant question is not whether proceedings continue in the
2 abstract, but whether prolonged detention without a genuine opportunity for
3 release remains constitutionally permissible. Here it does not.
4

5 96. Taken together, the Banda factors establish that Petitioner’s detention has
6 become prolonged enough to trigger heightened procedural due process
7 protection. The length of detention, likely duration of future detention, and
8 conditions of detention weigh strongly in Petitioner’s favor; delays
9 attributable to the detainee do not weigh against her; delays attributable to
10 the government are unknown and therefore neutral; and the likelihood of a
11 final order of removal does not justify continued detention without
12 meaningful custody review. Under *Sadeqi* and *Yevhenii*, Petitioner is
13 entitled to a meaningful custody determination. The question, then, is
14 whether the immigration court can presently provide that determination in a
15 neutral and constitutionally adequate manner. The answer is no.
16
17
18
19

20 97. Requiring Petitioner to seek custody review through the immigration court
21 would be futile and constitutionally inadequate. Ex. N reflects that, since
22 President Trump returned to office, the administration has systematically
23 pressured immigration judges to deport more people, threatened them with
24 discipline if they do not align with administration priorities, and fired more
25 than 100 immigration judges. Ex. N further reflects that immigration judges
26
27
28

1 work for the Justice Department and can be fired, while Ex.N reflect that
2 immigration judges have been instructed not to grant bond to many
3 immigrants who entered without inspection and that the pressure to deny
4 bond is overt. Exs. I-P provides additional context regarding the
5 administration's broader immigration agenda, including mass deportation
6 and rhetoric portraying immigrants as dangerous and less deserving of legal
7 protection. In such a system, a custody request by Petitioner would not be
8 heard by a neutral and detached adjudicator.
9
10
11

12 98. Resort to the Board of Immigration Appeals would be futile for the same
13 reason. In *Perez Velasquez*, the Southern District of California recognized
14 evidence that the Board of Immigration Appeals had been drastically
15 reshaped and that the reconstituted Board was far less likely to provide any
16 efficacious relief. In waiving exhaustion, that court relied on evidence that
17 the Board agreed with the Department of Homeland Security in 97 percent
18 of cases in 2025, with incomplete data placing the figure around 90 percent
19 in 2026, and concluded that requiring further administrative review would
20 likely prolong detention without meaningful relief. *Perez Velasquez*, No. 26-
21 cv-01759-GPC-DDL, slip op. at 5–9. Ex. P reinforces that conclusion by
22 reporting that the Board issued a record number of precedent decisions in
23
24
25
26
27
28

2025, nearly all adverse to immigrants, including decisions making it harder for immigration judges to grant bond.

99. Petitioner's own experience confirms that the available administrative process is not meaningful. She has repeatedly requested an interpreter and has never been provided one, including in connection with outside medical care and communications with detention staff. She has therefore been unable fully advocate for herself while detained. Through counsel, she submitted three parole requests to ICE, all of which were ignored. Ex. L further shows that ICE has long maintained alternatives to detention, including telephonic reporting, GPS monitoring, and SmartLINK, underscoring that meaningful release options short of confinement exist and have been available throughout Petitioner's detention.

100. Because the Banda factors demonstrate that Petitioner's detention is prolonged, and because the current DOJ and EOIR system does not provide a neutral, meaningful, or efficacious forum for release, requiring Petitioner to seek custody review in immigration court would violate the Fifth Amendment's guarantee of procedural due process. Under these circumstances, remand to DOJ would not cure the constitutional defect; it would merely return Petitioner to the same biased and futile system that due process forbids the Court from relying upon.

1 101. Petitioner therefore seeks a custody redetermination by this Court,
2 sitting in habeas, applying the proper standards of danger, flight risk, and
3 less restrictive alternatives to detention. In the alternative, if the Court orders
4 a bond hearing rather than conducting the custody redetermination itself,
5 that hearing must be constitutionally adequate and must require the
6 Government to prove, by clear and convincing evidence, that Petitioner is a
7 flight risk or a danger to the community. *Singh*, 638 F.3d at 1200, 1203,
8 1208; *Sandesh v. La Rose*, No. 26-cv-0846-JES-DDL, 2026 WL 622690, at
9 *5 (S.D. Cal. Mar. 5, 2026).

13 102. This Court has previously applied that standard to bond hearings
14 ordered after prolonged detention found to violate the Fifth Amendment, and
15 courts have continued to do so in order to protect the substantial liberty
16 interests at stake. *Sandesh*, 2026 WL 622690, at *5; *Belqasim v. Bostock*,
17 No. 2:25-cv-01282-LK-TLF, 2025 WL 3466971, at *10 (W.D. Wash. Oct.
18 28, 2025), adopted by No. 2:25-cv-01282-LK, slip op. at 1–3 (W.D. Wash.
19 Nov. 17, 2025); *Gao v. LaRose*, 805 F. Supp. 3d 1106, 1112 (S.D. Cal. 2025).

23 103. It is imperative that any bond hearing ordered by this Court apply the
24 legal standard set forth in *Singh*. Doing so is necessary to protect Petitioner's
25 critical liberty interest and to ensure that any hearing ordered as a remedy
26 for prolonged detention is constitutionally sufficient. *Singh*, 638 F.3d at
27
28

1 1203, 1208; *Banda*, 385 F. Supp. 3d at 1120; *Belqasim*, 2025 WL 3466971,
2 at *10; *Gao*, 805 F. Supp. 3d at 112. If the Government cannot meet that
3 burden, the immigration judge must order Petitioner's release on appropriate
4 conditions of supervision, taking into account the availability of less
5 restrictive alternatives to detention and Petitioner's ability to comply with
6 any conditions imposed. *Singh*, 638 F.3d at 1203–08; *Alternatives to*
7 *Detention*, U.S. Immigr. & Customs Enf't, Ex. D.

8
9
10
11 **PRAYER FOR RELIEF**

12 WHEREFORE, Petitioner respectfully requests that this Court:

- 13 a. Assume jurisdiction over this action and waive any prudential exhaustion
14 requirement as futile, inadequate, and likely to cause irreparable harm.
15
16 b. Issue a writ of habeas corpus under 28 U.S.C. § 2241.
17
18 c. Declare that Petitioner's continued detention violates the Fifth Amendment.
19
20 d. Order Petitioner's immediate release from immigration detention.
21
22 e. In the alternative, order Respondents to release Petitioner within 24 or 48
23 hours subject to reasonable conditions of supervision short of detention.
24
25 f. In the further alternative, conduct a custody redetermination in this habeas
26 proceeding.
27
28 g. If the Court orders a bond hearing instead, require that the hearing occur
within 7 days, that the Government bear the burden of proving by clear and

1 convincing evidence that Petitioner is a flight risk or danger to the
2 community, that less restrictive alternatives to detention be considered, that
3 a competent interpreter be provided, that a contemporaneous record be
4 made, and that the immigration judge make specific findings if bond is
5 denied.
6

7
8 h. In light of Petitioner's diagnosed heart failure and related medical
9 conditions, enjoin Respondents from requiring Petitioner to wear an ankle
10 monitor or any leg-worn electronic monitoring device as a condition of
11 release, supervision, parole, or any other non-detention alternative. If
12 supervision is imposed, Respondents shall instead employ other reasonable,
13 non-leg-worn conditions of supervision.
14

15
16 i. Enjoin Respondents from transferring Petitioner outside this District while
17 this action remains pending.
18

19 j. Require Respondents to file confirmation of release and any conditions of
20 supervision within 48 hours of release.
21

22 k. Award reasonable attorney's fees and costs pursuant to the Equal Access to
23 Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412; and

24 l. Grant such other and further relief as the Court deems just and proper.
25

26 Respectfully submitted this 8th day of June 2026.
27
28

/s/ Edita Ghushchyan

Edita Ghushchyan, Esq.
Managing Attorney
International Institute of Los Angeles
3845 Selig Place
Los Angeles, CA 90031-3143
eghushchyan@iilosangeles.org
(323) 476-0654
Attorney for Petitioner

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

This verification was executed in Los Angeles, California, on this 8th day of June 2026.

Edita Ghushchyan, Esq.
Managing Attorney
International Institute of Los Angeles
3845 Selig Place
Los Angeles, CA 90031-3143
eghushchyan@iilosangeles.org
(323) 476-0654
Attorney for Petitioner