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8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**

10 Askat Zharmatov,

11 *Petitioner*

12 v.

13 1. TONYA ANDREWS, Facility  
14 Administrator, Golden State Annex Detention  
15 Center;

16 2. DAVID J. VENTURELLA,  
17 Acting Director, U.S. Immigration  
18 and Customs Enforcement;

19 3. TODD BLANCHE, Acting U.S.  
20 Attorney General;

21 4. MARKWAYNE MULLIN,  
22 Secretary, U.S. Department of  
23 Homeland Security.

24 *Respondents.*

CASE NO: 2:26-at-01149

**PETITION FOR WRIT OF  
HABEAS CORPUS  
PURSUANT TO 28 U.S.C. § 2241**

**PETITION FOR WRIT OF HABEAS CORPUS**

**PURSUANT TO 28 U.S.C. § 2241**

**INTRODUCTION**

1. Petitioner Askat Zharmatov (“Petitioner”) seeks a writ of habeas corpus to challenge his unlawful and indefinite detention by U.S. Immigration and Customs Enforcement (“ICE”). *See* Exhibit 1, Online Detainee Locator System. (*Exhibit 1, Ice Locator System*)

2. Mr. Zharmatov, a native and citizen of Kyrgyzstan (*Exhibit 2, Passport*), presented himself for inspection at Hidalgo, Texas on November 6, 2023. (*Exhibit 3, Notice to Appear*).

3. Petitioner presented himself at the Hidalgo, Texas Port of Entry on November 6, 2023, seeking admission to the United States. DHS subsequently served him with a Notice to Appear (Form I-862), classifying him as an arriving alien. Thereafter, on February 8, 2024, DHS exercised its discretionary authority under INA § 212(d)(5)(A) to parole Petitioner into the United States. His parole was authorized by a written Interim Notice Authorizing Parole dated February 8, 2024. (*See Exhibit 3 and Exhibit 4.*)

4. Since being paroled, Mr. Zharmatov has been residing in the United States at [REDACTED]. He is an asylum applicant. (*Exhibit 5, Form I-589, Application for Asylum and for Withholding of Removal, filed by Petitioner and currently pending.*) He has also obtained a valid employment authorization document and a state driver’s license. (*See Exhibit 6.*)

5. Despite his full compliance with all immigration requirements and his lawful work authorization, he was abruptly re-arrested by ICE on June 27, 2026.

6. On June 27, 2026, Petitioner appeared at his regularly scheduled ICE check-in in Sacramento, California, at approximately 10:00 a.m., as required by the conditions of his release. Petitioner had fully complied with all reporting requirements and other conditions of ICE supervision. During the check-in, ICE officers took Petitioner into custody without incident. He was subsequently transferred to the Golden State Annex Detention Center, McFarland, California, where he is currently detained.

1 7. The Department of Homeland Security (“DHS”) has not clearly indicated under  
2 which statutory authority Petitioner is currently detained. It remains uncertain whether  
3 Petitioner is being held pursuant to 8 U.S.C. § 1225(b), § 1226(a). This lack of clarity  
4 presents a grave due process concern and further underscores the arbitrariness of  
5 Petitioner’s ongoing incarceration. Petitioner therefore challenges his detention under any  
6 such authority to the extent it violates the Due Process Clause of the Fifth Amendment.

7 8. Regardless of the authority claimed, Petitioner contends that his ongoing detention  
8 is unlawful, arbitrary, and violates due process. Even assuming that § 1225(b) applied,  
9 Petitioner’s prolonged detention without any hearing or individualized determination  
10 violates the Fifth Amendment’s Due Process Clause. Freedom from government detention  
11 lies at the core of the liberty protected by due process.

12 9. Mr. Zharmatov has been jailed for a period without any chance to contest the  
13 necessity of his confinement, without any finding that he poses a flight risk or danger, and  
14 without basic procedural safeguards. The government’s summary revocation of his parole  
15 and re-detention without notice or a prompt bond hearing is fundamentally unfair and  
16 unconstitutional.

17 10. Accordingly, Mr. Zharmatov petitions this Court for habeas relief. He asks the Court  
18 to order his immediate release from custody.

19 11. He further requests that this Court declare that any detention under 8 U.S.C. § 1225  
20 is unlawful under the facts presented and that he is entitled to the protections of 8 U.S.C. §  
21 1226(a), including eligibility for a bond hearing. See *Chiliquinga Yumbillo v. Stamper*, No.  
22 2:25-cv-00479 (D. Me. Sept. 19, 2025) (order granting TRO) (persuasive authority from  
23 an out-of-circuit district court). Absent such relief, Petitioner will remain imprisoned  
24 indefinitely in violation of federal law and his constitutional rights.

**JURISDICTION AND VENUE**

12. This Court has subject matter jurisdiction over this Petition pursuant to 28 U.S.C. § 2241 (habeas corpus) and 28 U.S.C. § 1331 (federal question jurisdiction). Petitioner challenges the legality of his detention by federal immigration authorities, presenting federal questions arising under the Constitution, laws, and treaties of the United States. The Suspension Clause, U.S. Const. art. I, § 9, cl. 2, guarantees Petitioner the right to seek habeas corpus review of his civil immigration detention.

13. Venue is proper in the United States District Court for the Eastern District of California because Petitioner is detained at Golden State Annex, located at 611 Frontage Road, McFarland, California 93250, in Kern County, California. Petitions under 28 U.S.C. § 2241 must generally be filed in the district of confinement. Because Kern County lies within the Eastern District of California, this Court is the proper venue for this action. The Court has personal jurisdiction over Petitioner's immediate custodian, including the Warden or Facility Administrator of Golden State Annex, as well as the federal officials responsible for Petitioner's detention within this District.

**PARTIES**

14. Petitioner Askat Zharmatov is a native and citizen of Kyrgyzstan. He is detained in Golden State Annex Detention Center, McFarland, California, within the jurisdiction of this Court.

15. Respondent TONYA ANDREWS is the facility administrator of Golden State Annex and is the immediate physical custodian of Petitioner. In her official capacity, she has direct control over the facility where Petitioner is currently held and is therefore a proper respondent to this action.

16. Respondent TODD BLANCHE is the Acting United States Attorney General. As the head of the United States Department of Justice, he has supervisory authority over the Executive Office for Immigration Review (EOIR), the component of the Department of Justice responsible for administering the immigration court system, including removal

1 proceedings and custody redetermination (bond) hearings under the Immigration and  
2 Nationality Act (INA).

3 17. Respondent DAVID J. VENTURELLA is the Acting Director of the U.S.  
4 Immigration and Customs Enforcement. In his official capacity, he oversees the  
5 enforcement of immigration detention policies and procedures and is responsible for  
6 Petitioner's continued detention.

7 18. Respondent MARKWAYNE MULLIN is the Secretary of the Department of  
8 Homeland Security. He is responsible for the implementation and enforcement of the INA,  
9 and oversees ICE, which is responsible for Petitioner's detention. Mr. Mullin has ultimate  
10 custodial authority over Petitioner and is sued in his official capacity.

11 **FACTUAL BACKGROUND**

12 19. Petitioner Askat Zharmatov  is a citizen of Kyrgyzstan. Fleeing  
13 persecution in his home country based on his political opinion and he also seeks protection  
14 under the Convention Against Torture (CAT), he traveled to the United States to seek  
15 safety.

16 20. On or about November 6, 2023, Petitioner presented himself at the Hidalgo, Texas  
17 Port of Entry and applied for admission to the United States. Because he did not possess a  
18 valid immigrant visa or other required entry documents, he was inspected by officers of  
19 U.S. Customs and Border Protection ("CBP") and processed as an applicant for admission.  
20 DHS subsequently initiated removal proceedings by serving Petitioner with a Notice to  
21 Appear, charging him as an "arriving alien" under INA § 212(a)(7)(A)(i)(I). Thereafter, on  
22 February 8, 2024, DHS exercised its discretionary authority under INA § 212(d)(5)(A), 8  
23 U.S.C. § 1182(d)(5)(A), to parole Petitioner into the United States, releasing him from ICE  
24 custody pursuant to an Interim Notice Authorizing Parole. (*See Exhibits 3 & 4.*) The Notice  
25 to Appear confirms that Petitioner is charged as an arriving alien and inadmissible for  
26 lacking a valid immigrant visa or other required entry document at the time he applied for  
27 admission. Petitioner has not been charged with or found removable on any criminal or  
28 national security grounds.

1 21. After his release, Mr. Zharmatov resided at [REDACTED]

2 [REDACTED] While attending services at House of Bread Church, Petitioner met his  
3 fiancée, Ms. Iana Mocanu. Their friendship developed into a committed long-term  
4 relationship, and they became engaged with the sincere intention of marrying. Their  
5 relationship has continued to grow, and they have made concrete plans to build their future  
6 together. Petitioner has also established a close relationship with Ms. Mocanu's family,  
7 who fully support their relationship and consider him to be part of their family. He regularly  
8 participates in family gatherings, holidays, and other activities with them, and they have  
9 attested to his honesty, compassion, responsibility, and strong moral character. These  
10 substantial family and community ties demonstrate that Petitioner has every intention of  
11 remaining with his fiancée and her family, complying with all immigration proceedings,  
12 and continuing to build his life in the United States. (*See Exhibits 10-11-12 Support Letter*  
13 *from Fiancée, Denis Mocanu and roommate*)

14 22. Petitioner fully complied with all conditions of his parole and every instruction  
15 issued by ICE. Petitioner regularly reported for scheduled ICE check-ins in Sacramento,  
16 California, submitted to required home visits, and continuously wore the GPS electronic  
17 monitoring device provided by ICE. On the morning of June 27, 2026, at approximately  
18 10:00 a.m., Petitioner appeared as directed for his scheduled ICE check-in in 800 H St.  
19 Sacramento, California 95814. Instead of being released after the routine check-in, ICE  
20 officers took him into custody. He was subsequently transferred to the Golden State Annex  
21 Detention Center, in McFarland, California where he is currently detained. (*See Ex. 5 ICE*  
22 *check-in reports and GPS*)

23 23. The Petitioner has no criminal record and posed no danger to the public. There is no  
24 indication that he ever failed to comply with any official requirement or that he intended  
25 to abscond.

26 24. The Petitioner took affirmative steps to pursue legal status. He timely filed an I-589,  
27 Application for Asylum and for Withholding of Removal on August 29, 2024 within one  
28 year of his arrival, and that application remains pending. (*See Exhibit 6, Form I-589*).  
Application for Asylum and for Withholding of Removal.

1 25. On June 27, 2026, Petitioner appeared for his regularly scheduled ICE check-in in  
2 Sacramento, California, as required by the conditions of his release. Petitioner had  
3 consistently complied with all conditions of his parole, including attending scheduled ICE  
4 appointments, submitting to required home visits, and wearing a GPS electronic  
5 monitoring device. At the June 27, 2026 check-in, ICE officers took Petitioner into custody  
6 without incident. Prior to his detention, Petitioner resided at his home in Roseville,  
7 California, and continued to comply with all reporting requirements while his Form I-589,  
8 Application for Asylum and for Withholding of Removal, remained pending. Following  
9 his arrest, Petitioner was transferred to the Golden State Annex Detention Center, in  
10 McFarland, California, where he is currently detained.

11 26. This arrest occurred well after Petitioner's initial entry – more than two years after  
12 he was paroled into the country. Petitioner was not attempting to flee nor was he engaged  
13 in any wrongdoing at the time; ICE's action appears to have been part of a broad change  
14 in policy to detain certain noncitizens who had previously been allowed to live in the  
15 community.

16 27. ICE either treated Petitioner's one-year parole as expired or affirmatively  
17 terminated his parole early. In either event, ICE did not provide Petitioner with any advance  
18 notice or opportunity to respond before stripping him of parole and liberty. He was simply  
19 taken into custody and informed that he would remain detained. Petitioner was transported  
20 to the Golden State Annex Detention Center in McFarland, California far from his home  
21 and attorney, where he remains detained to this day.

22 28. Petitioner has now been detained at the Golden State Annex Detention Center. The  
23 conditions at the detention center are difficult and impose significant hardships on him.

24 29. With no set timeline for resolution of his asylum case, which may take months or  
25 even years, Petitioner faces the prospect of prolonged incarceration despite having  
26 committed no crime and posing no danger. This situation is tantamount to punishment and  
27 is causing Petitioner irreparable harm.  
28

**CLAIMS FOR RELIEF**

**COUNT ONE**

**Unlawful Detention under the Immigration and Nationality Act (INA)**

1. Petitioner's Detention Should Be Governed by 8 U.S.C. § 1226(a), Not § 1225(b). The INA's detention framework makes an important distinction between individuals who are applicants for admission at the border and those who are arrested inside the United States while in removal proceedings. Section 1225(b) generally applies to "arriving" aliens or recent entrants who are deemed applicants for admission – it requires their detention during removal proceedings and offers no opportunity for release on bond (only DHS parole, at its discretion). In contrast, 8 U.S.C. § 1226(a) applies to aliens who have entered the U.S. (even if unlawfully) and are facing removal proceedings under INA § 240; under § 1226(a), such individuals are eligible for release on bond or conditional parole by the Department of Justice's immigration courts.

2. In Petitioner's case, although DHS has labeled him an "arriving alien" because he was paroled, the reality is that he has been physically present in the United States for a prolonged period and is in standard removal proceedings. The plain text of the INA indicates that § 1226(a) – the default detention authority for those in removal proceedings – should govern here, not § 1225(b). In fact, § 1226(a) explicitly covers even those noncitizens charged as inadmissible for entering without proper documents.

3. Petitioner is charged with inadmissibility for lack of valid entry documents – a charge that squarely falls under § 1226(a) detention according to the statute's text. Thus, DHS's treatment of Petitioner under § 1225 is contrary to the statute. Had Petitioner entered the country without inspection (for example, by crossing the border illegally) and been caught days later, he would unquestionably be detained (if at all) under § 1226(a) with bond eligibility. It would be illogical and inequitable for him to be in a worse position (mandatory detention) simply because he followed the process at a port of entry and was paroled into the country. Congress did not intend § 1225(b)(2)(A) to apply to someone in Petitioner's posture – living in the U.S. for many months awaiting a hearing.

1 4. Accordingly, his current detention without bond is not authorized by the INA. The  
2 Court should hold that Petitioner is legally detained, if at all, under § 1226(a) and is entitled  
3 to the benefits of that provision (especially the possibility of release on bond or conditional  
4 parole by an immigration judge).

## 5 **COUNT TWO**

### 6 **Petitioner's Parole Termination Was Unlawful**

7 5. To the extent ICE justifies Petitioner's detention by saying his prior grant of parole  
8 has ended, Petitioner maintains that the revocation or termination of his parole was  
9 unlawful under the circumstances. DHS regulations permit termination of parole either  
10 upon the expiration of the parole period or earlier, with written notice, if the purposes of  
11 parole have been served or the agency decides continued presence is not in the public  
12 interest.

13 6. In Petitioner's case, it appears that ICE may have treated his parole as expired after  
14 one year. Petitioner was paroled into the United States on November 6, 2023, with parole  
15 authorized through February 8, 2024. ICE appears to have taken this position without  
16 properly considering an extension of parole or an alternative form of supervision.  
17 Alternatively, if ICE affirmatively terminated parole prior to its expiration, Petitioner  
18 received no written notice or explanation. The NTA served on Petitioner may have  
19 purported to serve as notice of parole termination per 8 C.F.R. § 212.5(e)(2)(i). Regardless  
20 of technical compliance with the regulations, the process afforded was minimal to  
21 nonexistent.

22 7. Petitioner had no opportunity to contest the termination of his parole or to present  
23 reasons why he should not be detained. If parole was terminated arbitrarily – for example,  
24 as part of a mass roundup of parolees – then Petitioner's continued detention is also  
25 unlawful for that reason. Furthermore, because Petitioner is eligible for asylum or other  
26 relief, terminating parole and detaining him without cause frustrates the humanitarian  
27 purpose for which parole was granted. This Court should scrutinize whether DHS properly  
28 followed the law in extinguishing Petitioner's parole and effectively converting his status  
to a detained applicant for admission. Any failure by DHS to follow its own procedures or

1 to act rationally in this respect is an additional basis to find Petitioner's detention unlawful  
2 and void.

3 **COUNT THREE**

4 **Detention Without a Bond Hearing Violates the Fifth Amendment Due Process**  
5 **Clause**

6 8. Even if Petitioner's custody were deemed statutorily authorized, the Constitution  
7 forbids the government from continuing to detain him under these conditions without  
8 affording basic due process. The Fifth Amendment's Due Process Clause applies to all  
9 "persons" on U.S. soil, including noncitizens like Petitioner. It protects against arbitrary  
10 detention and guarantees fundamental fairness in procedures that deprive a person of  
11 liberty. Petitioner's detention violates both procedural and substantive due process.

12 **COUNT FOUR**

13 **Lack of Any Individualized Hearing (Procedural Due Process Violation)**

14 9. Petitioner has never received an individualized custody hearing. At no point has an  
15 immigration judge or any neutral decision-maker reviewed whether Petitioner's  
16 imprisonment is justified by a legitimate government interest (such as risk of flight or  
17 danger) or whether alternatives to detention could serve the government's purposes.

18 10. Procedural due process typically requires, at minimum, notice of the reasons for  
19 detention and an opportunity to be heard at a meaningful time and in a meaningful manner.  
20 Here, Petitioner's parole was revoked without notice or an opportunity to respond, and he  
21 was not given any prompt post-arrest hearing.

22 11. The DHS determination to detain him has been unilateral and non-transparent.  
23 Petitioner essentially has been told that no hearing is available at all because of his  
24 "arriving" classification. This absolute denial of any hearing mechanism is unprecedented  
25 in the civil context – even persons arrested for crimes are entitled to a bail hearing within  
26 days. Numerous courts have recognized that due process requires a bond hearing for  
27 immigration detainees whose detention becomes prolonged. For example, a federal court  
28 in Maine, in *Chiliquinga Yumbillo v. Stamper*, granted a temporary restraining order for an

1 immigrant re-detained after living in the U.S., finding the petitioner was likely to prevail  
2 on his due process claim that re-arrest without an opportunity for bond was unlawful.

3 12. Other courts have similarly ordered bond hearings or conditional release for arriving  
4 or re-apprehended noncitizens who had been living in the community, reasoning that  
5 procedural due process demands an individualized determination of flight risk and danger  
6 once detention is no longer brief or inevitable. Petitioner's case for a hearing is at least as  
7 strong: he has a proven record of compliance and poses no danger to anyone, meaning that  
8 a fair hearing could very well result in his release. By denying him any hearing,  
9 Respondents are violating the *Mathews v. Eldridge* balancing test – the risk of erroneous  
10 deprivation of liberty here is high without a hearing, Petitioner's interest in freedom is  
11 fundamental, and the government's interests can be protected through less restrictive  
12 means like bond or supervision. In sum, the failure to provide a timely bond hearing is a  
13 clear violation of procedural due process.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Petitioner respectfully requests this Court to:

16 a. Enter an order asserting the Court's jurisdiction over this matter under 28 U.S.C. §  
17 2241;

18 b. Declare that Petitioner's ongoing detention is unlawful. In particular, declare that  
19 Petitioner is not properly subject to mandatory detention under 8 U.S.C. § 1225(b), and  
20 that his detention without a bond hearing violates the Immigration and Nationality Act, the  
21 Administrative Procedure Act, and the Due Process Clause of the United States  
22 Constitution as described above; 8 U.S.C. § 1226(a) applies to aliens who have entered the  
23 U.S. and are facing removal proceedings under INA § 240; under § 1226(a), such  
24 individuals are eligible for release on bond or conditional parole by the Department of  
25 Justice's immigration courts.

26 c. Order Respondents to immediately release Petitioner from custody on his own  
27 recognizance or under appropriate conditions of supervision or, in the alternative, order  
28 Respondents to provide Petitioner with a timely individualized bond hearing before a  
neutral immigration judge (or other appropriate adjudicator) at which the government bears

1 the burden of justifying continued detention. The Court should further order that if such a  
2 bond hearing is not conducted (and a decision rendered) within a short, specified timeframe  
3 (e.g. 7 days from the Court's order), Respondents must release Petitioner forthwith;

4 d. Issue an injunction preventing Respondents from re-arresting or re-detaining  
5 Petitioner in the future based on the same removal proceedings, unless Petitioner violates  
6 a material condition of release or new circumstances arise that would lawfully warrant  
7 detention under the INA (such as a final removal order or Petitioner becoming subject to a  
8 separate detention provision) to ensure that Petitioner is not subjected again to arbitrary  
9 detention without due process;

10 e. Grant attorneys' fees and costs of this suit under the Equal Access to Justice Act, 5  
11 U.S.C. § 504 and 28 U.S.C. § 2412(d), et seq.

12 f. Grant any other relief that the Court deems just and proper, including such relief as  
13 may be necessary to ensure that Petitioner's rights are fully protected.

14  
15 Dated: July 8, 2026

16 Respectfully submitted,

17 *By: /s/ YakupSari*

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23  
24 *Attorney for Petitioner*

**Table Of Contents****Exhibits: Zharmatov Askat A#241-380-091**

| <b>Exhibit No.</b> | <b>Description of Document</b>                                                                        | <b>Relevant Claim</b>                                                                                                                                                                                |
|--------------------|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Exhibit 1</b>   | <b>Online detainee locator system</b>                                                                 | ICE online detainee locator report                                                                                                                                                                   |
| <b>Exhibit 2</b>   | <b>Copy of Petitioner's Kyrgyzstan Passport Biographic Page</b>                                       | Proof of Identity & Citizenship                                                                                                                                                                      |
| <b>Exhibit 3</b>   | <b>Notice to Appear (Form I-862)</b>                                                                  | Proof of Immigration Proceedings                                                                                                                                                                     |
| <b>Exhibit 4</b>   | <b>Interim Notice Authorizing Parole; Parole Instructions/Reporting Page (dated February 8, 2024)</b> | Evidence that DHS exercised its discretionary authority under INA § 212(d)(5)(A) to parole Petitioner into the United States and released him from ICE custody, subject to the conditions of parole. |
| <b>Exhibit 5</b>   | <b>Check/In - Reporting requirement to ICE</b>                                                        | Proof of Compliance & No Flight Risk                                                                                                                                                                 |
| <b>Exhibit 6</b>   | <b>Application for Asylum (Form I-589)</b>                                                            | Proof of Relief Eligibility                                                                                                                                                                          |

|                       |                                                                                  |                                                                                                                                                                                                      |
|-----------------------|----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Exhibit<br/>7</b>  | <b>Work Authorization card (EAD)</b>                                             | Proof of Lawful Work Status                                                                                                                                                                          |
| <b>Exhibit<br/>8</b>  | <b>Commercial Driver's License(CDL)</b>                                          | <b>Evidence of Petitioner's<br/>lawful commercial driver's<br/>license, identity, and<br/>community ties.</b>                                                                                        |
| <b>Exhibit<br/>9</b>  | <b>Employment Offer Letter from<br/>Visenta Studio CA LLC</b>                    | Evidence of Petitioner's<br>prospective lawful<br>employment, financial stability,<br>and strong community ties in<br>the United States.                                                             |
| <b>Exhibit<br/>10</b> | <b>Declaration/Letter of Support from<br/>Iana Mocanu (Petitioner's Fiancée)</b> | Evidence of Petitioner's<br>committed relationship, intent<br>to marry, close ties with his<br>fiancée's family, good moral<br>character, and substantial<br>community ties in the United<br>States. |
| <b>Exhibit<br/>11</b> | <b>Declaration/Letter of Support from<br/>Denis Mocanu</b>                       | Evidence of Petitioner's good<br>moral character, close family<br>ties, and community support.                                                                                                       |

|                       |                                                                 |                                                                                                              |
|-----------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| <b>Exhibit<br/>12</b> | <b>Declaration/Letter of Support from<br/>Kanatbek Ryskulov</b> | Evidence of Petitioner's<br>residence, close family ties,<br>good moral character, and<br>community support. |
|-----------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|

VERIFICATION

I, Yakup Sari, counsel for Petitioner hereby verify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the factual allegations in this petition are true and correct to the best of my knowledge, information, and belief, based upon the records available and information provided by Petitioner.

Dated: July 8, 2026

Respectfully submitted,

By: /s/ Yakup Sari

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