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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

Jefferson DOMINGUEZ-LARA;
Jose RAMIREZ,
on behalf of themselves as individuals
and on behalf of others similarly situated,

Plaintiffs,

vs.

KRISTI NOEM, Secretary of
the United States Department of Homeland
Security; PAM BONDI,
United States Attorney General;
TODD LYONS, Director of
United States Immigration and Customs
Enforcement; BRYAN WILCOX,
Field Office Director for Detention and
Removal, U.S. Immigration and Customs
Enforcement, Department of Homeland
Security; John Mattos, Warden,
Nevada Southern Detention Center;
EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW (EOIR);
Sirce OWEN, Acting Director, EOIR;
LAS VEGAS IMMIGRATION COURT

Defendants.

CIVIL NO. 2:25-CV-1553

CLASS ACTION
COMPLAINT AND
PETITION FOR WRIT
OF HABEAS CORPUS

INTRODUCTION

1. Plaintiffs are noncitizens detained at the Nevada Southern Detention Center (NSDC) who face prolonged detention because of a unique policy adopted by U.S. Immigration and Customs Enforcement (ICE) that prevent them and others from being released on bond while in civil immigration proceedings. Agency policies and practices further exacerbate Plaintiffs' plight—and prolong their detention and that of others—by failing to provide an expediated appeal process for bond determinations.

2. Starting in July of 2025, government counsels for ICE have started filing frivolous appeals for every bond decision where a bond has been granted to a noncitizen in removal proceedings who entered the United States without inspection, including as to those who have lived here for decades. Government counsels justify their position by citing the mandatory detention provision of Section 235 of the Immigration and Nationality Act (INA) even though that provision is explicitly limited to those “seeking admission”, providing a mechanism for expediated removal. Notably, when government counsel files a Notice of Intent to Appeal (EOIR Form 43) or a Notice of Appeal (EOIR Form 26), the bond decision is stayed for 10 days and a further 90 days, respectively.

3. Government counsels' actions defy the INA. Detention under 8 U.S.C. § 1225(b)(2) is limited to recent arrivals to the United States and does not apply to those who have lived in this country for years.

4. Importantly, ICE detained the instant Plaintiffs and others similarly situated with an administrative arrest warrant issued under Section 236 of the INA, as further governed under 8 U.S.C. § 1226(a), not § 1225(b), for the arrest and detention of noncitizens who entered without inspection and are later apprehended in the interior. ICE documents the arrest of such noncitizens under Section 236 of the INA in Form 213, which is typically filed into the record for bond proceedings by government who, nonetheless, go on to argue that detention is occurring under Section 235 of the INA.

5. There are now dozens, if not hundreds, of noncitizens detained at NSDC who are being denied their right to be released on bond because of this practice.

6. The only form of relief available to these noncitizens is to fight these appeals by ICE to the Board of Immigration Appeals (BIA), a course of action that virtually always ends in mootness.

7. The BIA, on average, takes over six months to issue a decision on a bond appeal. However, since the Las Vegas Immigration Court, on average, takes three months to conclude the removal proceedings for a detained individual, bond appeals are

meaningless. By the time the BIA issues its decision the individual has either won relief and been released or has been deported. Unfortunately, detained noncitizens often make the decision to give up and ask for removal rather than suffer the spirit-breaking conditions at NSDC and face the daunting task of trying to coordinate their removal defense while being detained even when they have meritorious claims for relief.

8. The BIA's systematic bond appeal delays are depriving detained noncitizens of their Due Process rights. ICE, recognizing this failure by the BIA, is taking advantage of these delays by filing frivolous appeals for every single bond grant, acting much as a petulant child who has not gotten his way would. Perhaps government counsels think this new tactic is clever, forcing detained noncitizens who have been granted bond to languish in NSDC or accept defeat and be removed even when they are statutorily eligible to remain in the U.S. It is not clever; it is deplorable. If attorneys from the private sector engaged in this manner of litigation, they would most likely face disciplinary action if not outright disbarment.

9. ICE's bond appeal tactic is inflicting permanent, irreparable harm on detained noncitizens who have been granted a bond.

10. Plaintiffs seek to represent two classes of noncitizens to challenge these agency policies and practices denying bond and preventing any meaningful appeal.

11. First, Plaintiffs seek to represent a class of noncitizens detained at the NSDC who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival into the United States, and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing and has been or will be granted a bond by an immigration judge in the Las Vegas Immigration Court (“Bond Stay Class”). This class of individuals seeks declaratory relief that establishes class members are not subject to bond decision stays under 8 C.F.R. §1003.19 and therefore entitled to immediately post the determined bond amount with ICE and be released from detention.

12. Second, Plaintiffs seek to represent a class of noncitizens who have a pending appeal, or will file an appeal or respond to an appeal filed by government counsel, of an IJ’s bond hearing ruling to the BIA (“Bond Appeal Class”). This class of individuals seeks declaratory relief that establishes their right to a bond appeal decision by the BIA within thirty days of filing the notice of appeal.

JURISDICTION AND VENUE

13. This case arises under the Immigration and Nationality Act (INA), 8 U.S.C. §§ 1101–1538, and its implementing regulations; the Administrative Procedure Act (APA), 5 U.S.C. §§ 500–596, 701–706; and the U.S. Constitution.

14. This Court has jurisdiction pursuant to 28 U.S.C. § 1331, as this is a civil action arising under the laws of the United States, and under 28 U.S.C. § 2241, as the case challenges Plaintiffs' and class members' unlawful detention.

15. 2 The Court may grant relief pursuant to 28 U.S.C. § 2241; the Declaratory Judgment Act, 28 U.S.C. § 2201; the APA, 5 U.S.C. §§ 702, 706; the All Writs Act, 28 U.S.C. § 1651; Federal Rule of Civil Procedure 65; and the Court's inherent equitable powers.

16. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(e) because Defendants are U.S. agencies and officers of the United States acting in their official capacities or because they reside in this district. In addition, a substantial part of the events or omissions giving rise to the claims occurred in this District, Plaintiffs are detained in this District, and no real property is involved in this action.

PARTIES

17. Plaintiff Jefferson Dominguez-Lara is currently detained at NSDC. He is a resident of Las Vegas, NV. The immigration court granted him bond in the amount of \$3,000.00 on July 21, 2025, which was immediately stayed by government counsel filing a Notice of Intent to Appeal.

18. Plaintiff Jose Ramirez is currently detained at NSDC. He is a resident of Las Vegas, NV. The immigration court granted him bond in the amount of \$3,000.00 on July 16, 2025, which was immediately stayed by government counsel filing a Notice of Intent to Appeal.

19. Defendant Bryan Wilcox is the Field Office Director for ICE Enforcement and Removal Operations (ERO) in Salt Lake City, UT. As the ERO Salt Lake City Field Office Director, he is Plaintiffs' immediate custodian, responsible for their detention at NSDC, and the person with the authority to authorize their detention or release. Defendant Wilcox is sued in his official capacity.

20. John Mattos is the Warden of the NSDC, oversees the day-to-day functioning of NSDC, and has immediate physical custody of Plaintiffs pursuant to a contract with ICE to detain noncitizens. Mr. Mattos is sued in his official capacity as the Warden of a federal detention facility.

21. Defendant Kristi Noem is the Secretary of the Department of Homeland Security. As Secretary, she oversees the federal agency responsible for implementing and enforcing the INA, including the detention of noncitizens. She is sued in her official capacity.

22. Defendant Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention of noncitizens.

23. Defendant Pamela Bondi is the Attorney General of the United States and head of the U.S. Department of Justice. In that capacity, she oversees administrative warrants issued under Section 236 of the INA. She is sued in her official capacity.

24. Defendant EOIR is a component agency of the Department of Justice responsible for conducting removal and bond hearings of noncitizens. EOIR is comprised of a lower adjudicatory body administered by IJs and an appellate body known as the Board of Immigration Appeals.

25. Defendant Sirce Owen is the Director of EOIR and has ultimate responsibility for overseeing the operation of the immigration courts and the Board of Immigration Appeals, including bond hearings. She is sued in her official capacity.

LEGAL BACKGROUND

Detention under 8 U.S.C. § 1226(a) and § 1225(b)(2)

26. The INA prescribes three basic forms of detention for noncitizens in removal proceedings.

27. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard non expedited removal proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are entitled to a bond hearing at the outset of their detention, see 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, see 8 U.S.C. § 1226(c).

28. Second, the INA provides for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission referred to under § 1225(b)(2).

29. Last, the Act also provides for detention of noncitizens who have been previously ordered removed, including individuals in withholding-only proceedings, see 8 U.S.C. § 1231(a)–(b).

30. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

31. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104–208, Div. C, §§ 302–03, 110 Stat. 3009–546, 3009–582 to 3009–583, 3009–585. Section 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No. 119–1, 139 Stat. 3 (2025).

32. Following enactment of the IIRIRA, EOIR drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225 and that they were instead detained under § 1226(a). *See, Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures*, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

33. Thus, in the decades that followed, most people who entered without inspection unless they were subject to some other detention authority—received bond hearings. That practice was consistent with many more decades of prior practice, in which noncitizens who were not deemed “arriving” were entitled to a custody hearing before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a) (1994); see also H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply “restates” the detention authority previously found at § 1252(a)).

34. Starting in July of 2025, government counsel for ICE started arguing in bond hearing before the Las Vegas Immigration Court that all individuals who entered the U.S. without inspection are subject to expedited removal, regardless of how long they have resided in the U.S. or where in the interior of the U.S. they were encountered by ICE, over twenty-five years after IIRIRA was enacted.

35. ICE reasons that the mandatory detention provision of § 1225(b)(2)(A) applies to people who enter without inspection because that subparagraph of the statute references “applicant[s] for admission.” According to ICE, the paragraph therefore applies to all individuals who are subject to the grounds of inadmissibility at § 1182, including § 1182(a)(6)(A) and (a)(7). Those two provisions make inadmissible people who entered the United States without inspection or who do not have adequate documentation to allow them to enter or remain in the United States. When the immigration judges of the Las Vegas Immigration Court recognized that this position is without merit or any legal basis, continuing to grant bond to individuals who have resided in the U.S. for over two years and arrested by ICE under Section 236 of the INA, ICE started immediately filing frivolous appeals for every single bond grant.

36. This policy change has dramatic consequences. As a result of it, all noncitizens detained at NSDC who have entered the United States without inspection and are subject to the grounds of inadmissibility, including long-time U.S. residents, are now in *de facto* mandatory detention under § 1225(b) and ineligible to post their bonds because of the stays exercised by ICE.

37. This interpretation defies the INA. The plain text of the statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people similarly situated to the Plaintiffs.

38. Section 1226(a) applies by default to all persons “pending a decision on whether the [noncitizen] is to be removed from the United States.” These removal hearings are held under § 1229a, which “decid[e] the inadmissibility or deportability of a[] [noncitizen].”

39. The text of § 1226 also explicitly applies to people charged as being inadmissible, including those who entered without inspection. See 8 U.S.C. § 1226(c)(1)(E). Subparagraph (E)’s reference to such people makes clear that, by default, such people are afforded a bond hearing under subsection (a). Section 1226 therefore leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole.

40. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently entered the United States. The statute’s entire framework is premised on inspections at the border of people who are “seeking admission” to the United States. 8 U.S.C. § 1225(b)(2)(A).

41. Accordingly, the mandatory detention provision of § 1225(b)(2) does not apply to people such as the Plaintiffs and other putative class members.

42. Notably, ICE counsels adopted their interpretation of § 1225(b) even though DHS, the agency responsible for arresting and detaining noncitizens at NSDC, initially detains noncitizens through a contrary section of the INA.

43. DHS continues to issue arrest warrants pursuant to § 1226 for people who have entered without inspection and who have since resided in the United States.

44. When DHS arrests individuals such as the Plaintiffs, the agency typically issues a Notice of Custody Determination (Form I-286). That Notice states that the basis for the individual's detention is § 236 of the INA, which corresponds to 8 U.S.C. § 1226.

45. The BIA's appellate process does not offer a meaningful avenue to correct ICE's manipulative legal maneuvering.

46. According to the agency's own data, during FY 2024, the agency's average processing time for a bond appeal was 204 days, or nearly seven months.

47. The lengthy delays in bond appeal determinations affect all noncitizens who are detained, who have a right to a bond hearing, and who have their request for a bond denied or cannot afford the bond they are provided.

48. This average of 204 days tells only part of the story. The data released by EOIR shows that in many cases, the BIA review takes far longer—in some cases, a year or more—to decide a person's bond appeal.

49. These processing times defy the Due Process Clause.

50. The Supreme Court and the Ninth Circuit have explained that appellate review is a critical component of a constitutional civil detention scheme, including in immigration cases. *See, e.g., Schall v. Martin*, 467 U.S. 253, 280 (1984); *Singh v. Holder*, 638 F.3d 1196, 1209 (9th Cir. 2011); *Prieto-Romero v. Clark*, 534 F.3d 1053, 1065–66 (9th Cir. 2008).

51. The Supreme Court has also made clear that timely appellate review is a key feature of any civil detention scheme. As the Court has explained, “[r]elief [when seeking review of detention] must be speedy if it is to be effective.” *Stack v. Boyle*, 342 U.S. 1, 4 (1951).

52. Most notably, the Court upheld the federal pretrial detention under the Bail Reform Act in part because the statute “provide[s] for immediate appellate review of the detention decision.” *United States v. Salerno*, 481 U.S. 739, 752 (1987). As the Ninth Circuit later elaborated, “[e]ffective review of pretrial detention orders necessarily entails a speedy review in order to prevent unnecessary and lengthy periods of incarceration on the basis of an incorrect magistrate’s decision.” *United States v. Fernandez-Alfonso*, 813 F.2d 1571, 1572 (9th Cir. 1987).

53. These principles derive from the federal pretrial context, where, by definition, individuals are subject to federal criminal proceedings. Yet here, where only civil

proceedings are at issue, the BIA provides nothing like the speedy review federal district and appellate courts provide of magistrate judge detention decisions.

54. Without timely review, appellate review is meaningless. Indeed, the Supreme Court has explained that the opportunity to obtain “freedom before conviction permits the unhampered preparation of a defense, and serves to prevent the infliction of punishment prior to conviction.” *Stack*, 342 U.S. at 4. Additionally, such detention “may imperil the [detained person’s] job, interrupt his source of income, and impair his family relationships.” *Gerstein v. Pugh*, 420 U.S. 103, 114 (1975).

55. During the many months the BIA takes to review a bond appeal, a detained noncitizen will be forced to defend themselves against their removal on the merits, depriving them of a meaningful chance to assemble evidence outside detention, coordinate with family, or communicate with potential witnesses in other countries.

56. Indeed, their very detention significantly reduces their likelihood of obtaining legal representation. In removal proceedings, noncitizens have the right to be represented by legal counsel but “at no expense to the government.” 8 U.S.C. § 1362. Those detained while in removal proceedings face significant challenges to accessing and communicating with counsel or other forms of legal assistance. *See, e.g.,* ACLU, No Fighting Chance: ICE’s Denial of Access to Counsel in U.S.

Immigration Detention Centers 6 (June 9, 2022), <https://www.aclu.org/publications/no-fighting-chance-ices-denial-access-counsel-us-immigration-detention-centers>.

57. The lack of legal representation in turn dramatically reduces the potential for successful outcomes in their underlying removal proceedings. *Id.* at 12.

58. The months a noncitizen waits for appellate review also deprives them of time with their spouses, children, parents, and other family members. These individuals—who are often U.S. citizens or lawful permanent residents—are similarly deprived of the love, care, and financial support that the detained person provides.

59. Time in detention is also difficult in other ways. Detained persons are often incarcerated in jail-like settings, forced to sleep in communal spaces, receive inadequate medical care, and subjected to other degrading treatment.

60. While not all noncitizens succeed in their appeals, some do. The BIA's months-long appellate review means that for those individuals, they have spent months of unnecessary time in detention and suffered the many harms outlined above.

61. Such review processing times violate the Due Process Clause and do not constitute a reasonable time as required by the APA.

CLASS ALLEGATIONS

62. Plaintiffs bring this action on behalf of themselves and all other persons who are similarly situated, pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(2). A class action is proper because this action involves questions of law and fact common to the class; the class is so numerous that joinder of all members is impractical; the claims of the Plaintiffs are typical of the claims of the class, Plaintiffs will fairly and adequately protect the interests of the class; and Defendants have acted on grounds that apply generally to the class, so that final declaratory relief is appropriate with respect to the class as a whole.

Bond Stay Class

63. Plaintiffs seek to represent a “Bond Stay Class” comprised of the following: All noncitizens detained at the Northwest ICE Processing Center who (1) have entered or will enter the United States without inspection, (2) are not apprehended upon arrival into the United States, and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the noncitizen is scheduled for or requests a bond hearing and has been or will be granted a bond by an immigration judge in the Las Vegas Immigration Court (“Bond Stay Class”) that has been statutorily stayed.

64. The Bond Stay Class is so numerous that joinder of all members is impracticable. Plaintiffs are not aware of the exact number of putative class members as Defendants are uniquely positioned to identify such persons. Upon information and belief, there are hundreds of individuals detained each year at NSDC to whom the ICE automatic, frivolous appeal policy applies. The class is also comprised of many future members.

65. The proposed class meets the commonality requirement of Federal Rule of Civil Procedure 23(a)(2). All class members present the same question of whether ICE's abuse of the statutory stay under 8 C.F.R. §1003.19 constitutes a Due Process violation.

66. Plaintiffs' claims are typical of the class, as they face the same injury as the class and assert the same claims and rights as the class. The proposed class meets the adequacy requirement of Federal Rule of Civil Procedure 23(a)(4). The Named Plaintiffs seek a declaration of rights applicable to the whole class, are represented by competent class counsel, and will fairly and adequately protect the class's interest.

Bond Appeal Class

67. Plaintiffs seek to represent a class entitled the "Bond Appeal Class," where detained noncitizens have a pending appeal, will file an appeal of, or will respond

to an appeal filed by ICE of an immigration judge's bond hearing ruling before the Board of Immigration Appeals.

68. The Bond Appeal Class is so numerous that joinder of all members is impracticable. Plaintiffs are not aware of the exact number of potential class members because Defendants are uniquely positioned to identify such persons. However, upon information and belief, there are thousands of noncitizens who file an appeal in their bond proceedings each year.

69. The proposed class meets the commonality requirement of Federal Rule of Civil Procedure 23(a)(2). All class members present the same question of whether the Due Process Clause or the APA entitles them to timely adjudication of their bond hearing appeals.

70. Plaintiffs' claims are typical of the class, as they face the same injury as the class and assert the same claims and rights as the class.

71. The proposed class meets the adequacy requirement of Federal Rule of Civil Procedure 23(a)(4). The proposed class seeks a declaration of rights applicable to the whole class, is represented by competent immigration counsel, and Plaintiffs will fairly and adequately protect the class's interest.

CAUSES OF ACTION

COUNT I

Violation of the Due Process Clause of the Fifth Amendment Delayed Posting of
Bonds (on Behalf of Plaintiffs and the Bond Stay Class)

72. Plaintiffs incorporate by reference the allegations of fact set forth in paragraphs 1–71.

73. The Due Process Clause protects noncitizens’ vested interests in bond grants.

74. By automatically staying bond grants with frivolous appeals that lack timely adjudication, said vested interests are deprived without any procedural safeguards.

75. This failure to protect against unlawful taking violates the Due Process Clause of the Fifth Amendment.

COUNT II

Violation of the Administrative Procedure Act Unlawful Stay of Bond Grants (on
Behalf of Plaintiffs and the Bond Stay Class)

76. Plaintiffs incorporate by reference the allegations of fact set forth in paragraphs 1–75.

77. The application of 8 C.F.R. §1003.19 to Bond Stay Class members is arbitrary, capricious, and not in accordance with law, and as such, it violates the APA. *See* 5 U.S.C. § 706(2).

COUNT III

Violation of the Due Process Clause of the Fifth Amendment Delayed
Adjudication of Bond Appeals (on Behalf of Plaintiff and the Bond Appeal Class)

78. Plaintiffs incorporate by reference the allegations of fact set forth in paragraphs 1–77.

108. The Due Process Clause guarantees persons in civil detention timely appellate review of the decision to detain.

79. By not adjudicating appeals within thirty days of the filing of a notice of appeal, the BIA does not provide timely appellate review of detention decisions.

80. This failure to provide timely appellate review violates the Due Process Clause of the Fifth Amendment.

COUNT IV

Violation of the Administrative Procedure Act Delayed Adjudication of Bond
Appeals (on Behalf of Plaintiff and the Bond Appeal Class)

81. Plaintiffs incorporate by reference the allegations of fact set forth in paragraphs 1–80.

82. The APA requires that agencies act on matters presented to them within a “reasonable time.” 5 U.S.C. § 555(b). It also empowers individuals to sue for “agency action unlawfully withheld or unreasonably delayed.” Id. § 706(1)

83. In the context of physical liberty, a reasonable time for appellate review of a civil detention decision is thirty days from the filing of the notice of appeal.

84. The BIA's appellate review extends far longer than thirty days in the cases of proposed Bond Appeal Class members.

85. This failure to provide timely appellate review violates the APA.

PRAYER FOR RELIEF WHEREFORE,

A. Plaintiff respectfully requests that this Court:

1. Assume jurisdiction over this matter;
2. Certify this case as a class action, and certify a Bond Stay Class and a Bond Appeal Class;
3. Appoint Named Plaintiffs as representatives of the Bond Stay Class;
4. Appoint Named Plaintiffs as representatives of the Bond Appeal Class;
5. Appoint undersigned counsel as class counsel pursuant to Federal Rule of Civil Procedure 23(g).

B. As remedies for each of the causes of action asserted above, Plaintiffs and proposed class members request:

1. A declaratory judgment finding Defendants' policy and practice of staying bonds under 8 C.F.R. §1003.19 violate the INA, Due Process Clause and the APA;

2. A writ of habeas corpus as to Named Plaintiffs, requiring that Defendants release them or allow them to post their respective bonds within 7 days;

3. A declaratory judgment finding that the Due Process Clause or the APA provides that the Named Plaintiffs and the Bond Appeal Class Members have a right to timely adjudication of their bond appeal by receiving a decision within 30 days of filing the notice of appeal so long as the noncitizen remains detained;

4. A writ of habeas corpus as to Named Plaintiffs, requiring that Defendants release him or adjudicate his bond appeal within 30 days;

C. Reasonable attorneys' fees and costs pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412(d), 5 U.S.C. § 504, or any other applicable law; and

D. Such further relief as this Court deems just and appropriate.

DATED this 18th day of August, 2025.

A handwritten signature in blue ink, appearing to read "Jeremy Mondejar", is written over a horizontal line.

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