

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

Mr. Uthayachandran Uthayakumar,
Petitioner

v.

DREW BOSTOCK, Seattle Field Office
Director, Immigration and Customs
Enforcement and Removal Operations (ICE/
ERO); U.S. Immigration and Customs
Enforcement; **KRISTI NOEM**, Secretary of
the Department of Homeland Security; U.S.
Department of Homeland Security (DHS);
PAMELA BONDI, Attorney General of
the United States, and **TODD LYONS**, Director,
Immigration and Customs Enforcement.

Respondents

PETITION FOR WRIT OF HABEAS CORPUS

CASE No: 25-5786

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

Petitioner, Uthayachandran Uthayakumar (Mr. Uthayakumar) is a citizen of Sri Lanka who Respondents have detained at the Northwest Detention Center (AKA, Northwest ICE Processing Center) for nine (9) months. His detention has thus become prolonged and is no longer reasonably related to its statutory purpose. Because he is likely to face many additional months in detention, he seeks relief from this Court that would allow him to challenge his continuing, length and unconstitutional detention.

JURISDICTION

1. Petitioner is in the physical custody of Respondents and Immigration and Customs Enforcement (ICE), an agency within the Department of Homeland Security (DHS). He

is detained at the Northwest Detention Center in Tacoma, Washington and is under the direct control of Respondents and their agents.

2. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*
3. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause).
4. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.
5. Nothing in the INA deprives this Court of jurisdiction, including 8 U.S.C. §§ 1252(b)(9), (f)(1), or 1226(e). Congress has preserved judicial review of challenges to prolonged immigration detention. *See Jennings v Rodriguez*, 138 S. Ct. 830, 839-41 (2018) (holding that 8 U.S.C. §§ 1252(b)(9) and 1226(e) do not bar review of challenges to prolonged immigration detention).

VENUE

6. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Western District of Washington, the judicial district in which the Petitioner is currently in custody.
7. Venue is also properly vested in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies in the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Western District of Washington.

Parties

8. Petitioner is a citizen of Sri Lanka who most recently arrived in the United States on or about November 15, 2023, in San Diego, California. He has been in custody of the Department of Homeland Security (DHS) since November 15, 2023. Since that time, he has sought relief from removal in his immigration court case.
9. Respondent Drew Bostock is the Acting Director of the Seattle District Office of Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement, Department of Homeland Security. As such, Mr. Bostock is Petitioner's immediate custodian. He is named in his official capacity.
10. Respondent Todd Lyons is the acting director of U.S. Immigration and Customs Enforcement, and he has authority over the actions of respondent Drew Bostock and ICE in general. Respondent Lyons is a legal custodian of Petitioner.
11. Respondent Kristi Noem is the Secretary of the Department of Homeland Security (DHS) and has authority over the actions of all other DHS Respondents in this case, as well as all operations of DHS. Respondent Noem is a legal custodian of Petitioner and is charged with faithfully administering the immigration laws of the United States.
12. Respondent Pamela Bondi is the Attorney General of the United States, and as such has authority over the Department of Justice and is charged with faithfully administering the immigration laws of the United States.
13. Respondent Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention of noncitizens.

14. Respondent U.S. Immigration Customs Enforcement is the federal agency responsible for custody decisions relating to non-citizens charged with being removable from the United States, including the arrest, detention, and custody status of non-citizens.

FACTUAL ALLEGATIONS

15. Petitioner, Uthayachandran Uthayakumar (Mr. Uthayakumar), is a native and citizen of Sri Lanka. On or about November 15, 2024, Petitioner entered the United States near San Diego, California, without inspection or admission by an immigration officer. Immediately upon crossing the border, Petitioner was apprehended by United States Border Patrol (CBP) officers. Petitioner did not attempt to evade detection and was fully cooperative with immigration authorities.
16. Following his apprehension, Petitioner was held at a San Diego Border Patrol holding facility for approximately four (4) days. He was then transferred to a detention facility in Texas, where he remained for approximately eighteen (18) days. A Notice to Appear (NTA) was served upon him following a credible fear interview with a positive result. *See* Exh. 1. The Petitioner was placed into removal proceedings pursuant to the authority in 8 C.F.R 208.30, and the NTA marked “Section 235(b)(1) order was vacated...” and “You are an alien present in the United States who has not been admitted or paroled”, as opposed to designating the Petitioner as an arriving alien.
17. On or about December 2, 2024, Petitioner was transferred to the Northwest ICE Processing Center (Tacoma Detention Center) in Tacoma, Washington, where he has remained continuously detained by Respondents to the present date as of the filing of this petition.

18. Shortly after his transfer to Tacoma, Petitioner was provided with an initial master calendar and bond hearing. At that hearing, the Immigration Judge found that the court lacked jurisdiction to set bond, citing provisions of immigration law related to Petitioner's manner of entry into the United States. *See* Exh. 2. The IJ informed Petitioner that the only available process for review of his custody would be through the filing of an asylum application and further proceedings in immigration court. Petitioner's request for release was therefore denied, and he remained detained.
19. Through counsel, Petitioner timely filed a Form I-589, Application for Asylum and Withholding of Removal, along with extensive supporting documentation.
20. Petitioner appeared for his first individual merits hearing on May 27, 2025, before the Tacoma Immigration Court. The hearing lasted several hours, including approximately three and a half hours of direct and cross-examination of Petitioner and an additional hour and a half of argument and closing statements. Due to time constraints and the need for further questioning, the Immigration Judge did not complete the hearing. Instead, the Judge continued the matter for additional proceedings.
21. Although the Immigration Court acknowledged on May 27, 2025, that further testimony and argument were required, no follow-up hearing was scheduled prior to June 27, 2025, which is the statutory 30-day deadline. Petitioner remained detained without a set date for further proceedings for several weeks thereafter. Ultimately, the continued individual hearing was not scheduled until September 25, 2025, leaving Petitioner detained for four additional months without final adjudication of his asylum claim.
22. While detained, Petitioner has suffered severe and worsening mental health consequences due to his prolonged confinement, the conditions of detention, and separation from his

family. Petitioner has experienced persistent insomnia, anxiety, and depression and has been prescribed sleep medication by a facility psychiatrist. Despite these interventions, Petitioner's symptoms have worsened, and he remains emotionally distraught, fearful, and unable to function normally while detained. The language barrier has impeded Petitioner's ability to access medical and mental health care while in custody.

23. As of the filing of this petition, Petitioner has been continuously detained for over nine (9) months since his initial apprehension on November 15, 2024. Despite having a pending asylum application supported by substantial evidence and family members lawfully residing abroad as refugees, Petitioner continues to be held without bond or meaningful custody review.

24. His next individual hearing is scheduled for September 25, 2025, nearly four months after the prior incomplete hearing, prolonging his detention even further.

25. Petitioner's continued confinement is causing him irreparable physical and psychological harm and violates his rights under the INA and the Due Process Clause of the Fifth Amendment.

LEGAL FRAMEWORK

Due Process Clause

26. The Due Process Clause of the Fifth Amendment provides Petitioner with important protections regarding his detention. As the Supreme Court has explained, "[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty" that the Due Process Clause protects. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

27. The INA envisions three basic forms of detention for noncitizens in removal proceedings.

First is detention for noncitizens in regular, non-expedited removal proceedings. *See* 8

U.S.C. § 1226(a), (c). Individuals in § 1226(a) detention are entitled to a bond hearing at the outset of their detention, while noncitizens who have committed certain crimes are subject to mandatory detention. *See id.* § 1226(c).

28. The INA also provides for mandatory detention for noncitizens in expedited removal proceedings, 8 U.S.C. § 1225(b)(1), and detention for noncitizens whose immigration cases are completed, *id.* § 1231(a)(6). *See Banda v. McAleenan*, 385 F. Supp. 3d 1099, 1111-13 (W.D. Wash. 2019) (providing overview of INA's detention authorities).

29. In *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018), the Supreme Court held that as a matter of statutory interpretation, 8 U.S.C. § 1226(a) does not require the government to provide a detainee with more than an initial bond hearing. Significantly, the Court did not reach the constitutional question of whether the Due Process Clause requires an opportunity to test the government's justification for detention once detention after that initial hearing becomes prolonged.

30. Since the Supreme Court's *Jennings* decision, the Ninth Circuit has expressed "grave doubt" that "any statute that allows for arbitrary prolonged detention without any process is constitutional or that those who founded our democracy precisely to protect against the government's arbitrary deprivation of liberty would have thought so." *Rodriguez v. Marin*, 909 F.3d 252, 256 (9th Cir. 2018).

31. To guarantee against such arbitrary detention and to guarantee the right to liberty, due process requires "adequate procedural protections" that ensure the government's asserted justification for a noncitizen's physical confinement "outweighs the individual's

constitutionally protected interest in avoiding physical restraint.” *Zadvydas*, 533 U.S. at 690 (internal quotation marks omitted).

32. In the immigration context, the Supreme Court has recognized only two valid purposes for civil detention: to mitigate the risks of danger to the community and to prevent flight. *Id.*; *Demore*, 538 U.S. 510, 522, 528 (2003). The government may not detain a noncitizen based on any other justification.
33. As a result, where the government detains a noncitizen for a prolonged period or where the noncitizen pursues a substantial defense to removal or claim to relief, due process requires an individualized hearing before a neutral decisionmaker to determine whether detention remains reasonably related to its purpose. *Demore*, 538 U.S. at 532 (Kennedy, J., concurring) (stating that an “individualized determination as to [a noncitizen’s] risk of flight and dangerousness” may be warranted “if the continued detention became unreasonable or unjustified”); cf. *Jackson v. Indiana*, 406 U.S. 715, 733 (1972) (detention beyond the “initial commitment” requires additional safeguards); *McNeil v. Dir., Patuxent Inst.*, 407 U.S. 245, 249- 50 (1972) (noting that “lesser safeguards may be appropriate” for “short-term confinement”); *Hutto v. Finney*, 437 U.S. 678, 685-86 (1978) (observing, in Eighth Amendment context, that “the length of confinement cannot be ignored in deciding whether [a] confinement meets constitutional standards”).
34. At a minimum, detention without a bond hearing is unconstitutional when it exceeds six months. *See Demore*, 538 U.S. at 529-30 (upholding only “brief” detentions under 8 U.S.C. § 1226(c) that last “roughly a month and a half in the vast majority of cases . . . and about five months in the minority of cases in which the [non-citizen] chooses to

appeal”); *Zachrydas*, 533 U.S. at 701 (“Congress previously doubted the constitutionality of detention for more than six months.”).

35. The recognition that six months constitutes a substantial period of confinement is deeply rooted in our legal tradition. With only a few exceptions, “in the late 18th century in American crimes triable without a jury were for the most part punishable by no more than a six-month prison term.” *Duncan v. Louisiana*, 391 U.S. 145, 161 & n.34 (1968). Consistent with this tradition, the Supreme Court has found six months to be the limit of confinement for a criminal offense that a federal court may impose without the protection afforded by a jury trial. *Cheff v. Schnackenberg*, 384 U.S. 373, 380 (1966) (plurality opinion). The Court has also looked to six months as a benchmark in other contexts involving civil detention. *See McNeil*, 407 U.S. at 249, 250-52 (recognizing six months as an outer limit for confinement without individualized inquiry for civil commitment).
36. Accordingly, the Ninth Circuit has held that immigration detention becomes prolonged at six months. *See Diouf v. Napolitano*, 634 F.3d 1081, 1091 (9th Cir. 2011).
37. While due process may not require a bond hearing after six months in every case, at a minimum, due process demands a bond hearing after detention has become unreasonably prolonged. *See Diop*, 656 F.3d at 234. Courts that apply a reasonableness test have considered three main factors in determining whether prolonged detention is reasonable. First, courts have evaluated whether the noncitizen has raised a “good faith” challenge to removal—that is, the challenge is “legitimately raised” and presents “real issues.” *Chavez-Alvarez v. Warden York Cty. Prison*, 783 F.3d 469, 476 (3d Cir. 2015). Second, reasonableness is a “function of the length of the detention,” with detention presumptively unreasonable if it lasts six months to a year. *Id.* at 477-78; *accord Sopo*,

825 F.3d at 1217-18. Third, courts consider the likelihood that detention will continue pending future proceedings. *Chavez-Alvarez*, 783 F.3d at 478 (finding detention unreasonable after ninth months of detention, when the parties could “have reasonably predicted that Chavez-Alvarez’s appeal would take a substantial amount of time, making his already lengthy detention considerably longer”); *Sopo*, 825 F.3d at 128; *Reid*, 819 F.3d at 500.

38. Due process also requires certain minimal procedures at bond hearings. First, the government must bear the burden of proof by clear and convincing evidence to justify continued detention. Second, the decisionmaker must consider available alternatives to detention. Finally, if the government cannot meet its burden, a decisionmaker must assess a noncitizen’s ability to pay a bond when determining the appropriate conditions of release.
39. To justify prolonged immigration detention, the government must bear the burden of proof by clear and convincing evidence that the noncitizen is a danger or flight risk. *See Singh v. Holder*, 638 F.3d 1196, 1203 (9th Cir. 2011). The same is true for other contexts in which the Supreme Court has permitted civil detention; in those cases, the Court has relied on the fact that the government bore the burden of proof at least by clear and convincing evidence. *See United States v. Salerno*, 481 U.S. 739, 750, 752 (1987) (upholding pre-trial detention where the detainee was afforded a “full-blown adversary hearing,” requiring “clear and convincing evidence” before a “neutral decisionmaker”); *Foucha v. Louisiana*, 504 U.S. 71, 81-83 (1992) (striking down civil detention scheme that placed burden on the detainee); *Zachrydas*, 533 U.S. at 692 (finding post-final-order custody review procedures deficient because, *inter alia*, they placed burden on detainee);

see also *Padilla v. Immigration & Customs Enft*, 379 F. Supp. 3d 1170 (W.D. Wash. 2019) (requiring the government to bear the burden of proof for class members who receive bond hearings after being found to have a credible fear of persecution or torture); *Banda v. McAleenan*, 385 F. Supp. 3d 1120-21 (in case of arriving asylum seeker, government must bear burden of proof to justify continued detention after noncitizen had been detained for more than 18 months).

40. The requirement that the government bear the burden of proof by clear and convincing evidence is also supported by application of the three-factor balancing test from *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976).
41. First, prolonged incarceration deprives noncitizens of a “profound” liberty interest—one that always requires some form of procedural protections. *Diouf*, 634 F.3d at 1091- 92; see also *Foucha*, 504 U.S. at 80 (“It is clear that commitment for any purpose constitutes a significant deprivation of liberty that requires due process protection.” (citation omitted)).
42. Second, the risk of error is great where the government is represented by trained attorneys and detained noncitizens are often unrepresented and frequently lack English proficiency. See *Santasky v. Kramer*, 455 U.S. 745, 762-63 (1982) (requiring clear and convincing evidence at parental termination proceedings because “numerous factors combine to magnify the risk of erroneous factfinding” including that “parents subject to termination proceedings are often poor, uneducated, or members of minority groups” and “[t]he State’s attorney usually will be expert on the issues contested”). Moreover, Respondents detain noncitizens in prison-like conditions that severely hamper their

ability to obtain legal assistance, gather evidence, and prepare for a bond hearing. See *infra* ¶ 66.

43. Third, placing the burden on the government imposes minimal cost or inconvenience, as the government has access to the noncitizen's immigration records and other information that it can use to make its case for continued detention.
44. In light of these considerations, "[t]he overwhelming majority of courts to consider the question . . . have concluded that imposing a clear and convincing standard would be most consistent with due process." *Martinez v. Decker*, No. 18-CV-6527 (JMF), 2018 WL 5023946, at *5 (S.D.N.Y. Oct. 17, 2018) (internal quotation marks omitted).
45. Due process also requires that a neutral decisionmaker consider available alternatives to detention. A primary purpose of immigration detention is to ensure a noncitizen's appearance during removal proceedings. Detention is not reasonably related to this purpose if there are alternative conditions of release that could mitigate risk of flight. See *Bell v. Wolfish*, 441 U.S. 520, 538 (1979). ICE's alternatives to detention program—the Intensive Supervision Appearance Program (ISAP)—has achieved extraordinary success in ensuring appearance at removal proceedings, reaching compliance rates close to 100 percent. See *Hernandez v. Sessions*, 872 F.3d 976, 991 (9th Cir. 2017) (observing that ISAP "resulted in a 99% attendance rate at all EOIR hearings and a 95% attendance rate at final hearings"). It follows that alternatives to detention must be considered in determining whether prolonged incarceration is warranted.
46. Due process likewise requires consideration of a noncitizen's ability to pay a bond. "Detention of an indigent 'for inability to post money bail' is impermissible if the individual's 'appearance at trial could reasonably be assured by one of the alternate forms

of release.” *Id.* at 990 (quoting *Pugh v. Rainwater*, 572 F.2d 1053, 1058 (5th Cir. 1978) (en banc)). As a result, in determining the appropriate conditions of release for immigration detainees, due process requires “consideration of financial circumstances and alternative conditions of release” to prevent against detention based on poverty. *Id.*

47. Evidence about immigration detention and the adjudication of removal cases provide further support for the due process right to a bond hearing in cases of prolonged detention.

48. Immigration detainees face severe hardships while incarcerated. Immigration detainees are held in lock-down facilities, with limited freedom of movement and access to their families: “the circumstances of their detention are similar, so far as we can tell, to those in many prisons and jails.” *Jennings*, 138 S. Ct. at 861 (Breyer, J., dissenting); *accord Chavez-Alvarez*, 783 F.3d at 478; *Ngo v. INS*, 192 F.3d 390, 397-98 (3d Cir. 1999); *Sopo*, 825 F.3d at 1218, 1221. “And in some cases[,] the conditions of their confinement are inappropriately poor.” *Jennings*, 138 S. Ct. at 861 (Breyer, J., dissenting) (citing Dept. of Homeland Security (DHS), Office of Inspector General (OIG), DHS OIG Inspection Cites Concerns With Detainee Treatment and Care at ICE Detention Facilities (2017) (reporting instances of invasive procedures, substandard care, and mistreatment, e.g., indiscriminate strip searches, long waits for medical care and hygiene products, and, in the case of one detainee, a multiday lock down for sharing a cup of coffee with another detainee)).

49. These conditions and obstacles only further underscore the serious due process concerns that prolonged immigration detention pose for noncitizens like the Petitioner and reflect the need for a decision before a neutral decisionmaker regarding continued detention.

Bond Authority

50. The Immigration Judge (IJ) incorrectly asserted that the Respondent was ineligible for a bond hearing pursuant to INA § 235 (8 U.S.C. § 1226) which has deprived him of his right to a bond hearing.

51. INA § 235 is the provision of law that regards the designation and treatment of arriving aliens.

52. The Petitioner is not an arriving alien, having been processed under the provisions of the INA and CFR which place an alien into INA § 240 removal proceedings following a positive credible fear interview.

CLAIM FOR RELIEF

COUNT 1: Violation of Fifth Amendment Right to Due Process (Freedom from Arbitrary Detention)

53. Mr. Uthayakumar re-alleges and incorporates by reference the paragraphs above.

54. The Due Process Clause of the Fifth Amendment forbids the government from depriving any "person" of liberty "without due process of law." U.S. Const. amend. V.

55. Petitioner's detention, which has lasted more than six (6) months to date, constitutes prolonged detention and is not reasonably related to a legitimate government purpose.

56. Petitioner's Due Process rights were also violated when the IJ encouraged the Petitioner to withdraw his request for a bond hearing, prematurely and erroneously finding a lack of jurisdiction on the bond case by considering the Petitioner an arriving alien, despite never having been designated as such, and despite the NTA clearly establishing that the Petitioner's INA § 235(b) order be terminated under 8 C.F.R. § 208.30.

57. The IJ advised that he would make an adverse bond jurisdiction finding and encouraged the Respondent to withdraw his bond request despite the fact that Mr. Uthayakumar was placed into INA § 240 removal proceedings and would have been eligible and entitled to bond.
58. Moreover, DHS has prolonged Mr. Uthayakumar's detention without providing him an opportunity to test the continuing validity of his detention.
59. To justify Petitioner's ongoing prolonged detention, due process requires that the government establish, at an individualized hearing before a neutral decisionmaker, that his detention is justified by clear and convincing evidence of flight risk or danger, as well as whether alternatives to detention could sufficiently mitigate any risk that does exist.
60. For these reasons, Mr. Uthayakumar's ongoing detention without a hearing violates the Due Process Clause of the Fifth Amendment.

COUNT 2: Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A) Not in Accordance with Law and in Excess of Statutory Authority Violation of 8 U.S.C. § 1225(b)

61. Petitioner restates and realleges all paragraphs as if fully set forth here.
62. Under the APA, a court “shall . . . hold unlawful . . . agency action” that is “not in accordance with law;” “contrary to constitutional right;” “in excess of statutory jurisdiction, authority, or limitations;” or “without observance of procedure required by law.” 5 U.S.C. § 706(2)(A)-(D).
63. Both Congress and the evidence in the record make it clear that the arriving alien statute, and therefore mandatory detention, does not apply to those who are placed into INA § 240 removal proceedings following the process outlined in 8 C.F.R. § 208.30.

64. Under the APA, an agency must provide “reasoned explanation for its action” and “may not depart from a prior policy *sub silentio* or simply disregard rules that are still on the books.” *FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 515 (2009).
65. Because the IJ concluded that the Petitioner was bond ineligible and caused the Petitioner to withdraw his request for bond, the continued detention of the Petitioner without a bond hearing is arbitrary, capricious, and without the Due Process of law.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

66. Assume jurisdiction over this matter;
67. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three (3) days;
68. Declare that Petitioner’s detention without an individualized determination violates the Due Process Clause of the Fifth Amendment;
69. Issue a Writ of Habeas Corpus ordering the Respondents to release Petitioner from custody; hold a hearing if warranted; determine that Mr. Uthayakumar’s detention is not justified because the government has not established by clear and convincing evidence that Mr. Uthayakumar presents a risk of flight or a danger to the community in light of the available alternatives;
70. Issue an Order prohibiting the Respondents from transferring Petitioner from the district without the court’s approval;
71. Declare that Mr. Uthayakumar’s continued detention is unconstitutional and unlawful, as it is not reasonably related to any valid purpose of immigration detention and violates the Fifth Amendment guarantee of due process;

72. Declare that Respondents' conduct violates the Administrative Procedure Act, 5 U.S.C.

§§ 702 and 706, as arbitrary, capricious, and not in accordance with law;

73. In the alternative, should the Court determine that immediate release is not warranted,

order Respondents to provide Mr. Uthayakumar with an individualized bond hearing

before an impartial immigration judge within 14 days, at which the government bears the

burden to justify continued detention by clear and convincing evidence;

74. Award reasonable attorneys' fees and costs pursuant to the Equal Access to Justice Act,

28 U.S.C. § 2412, and any other applicable authority; and

75. Grant such other and further relief as the Court deems just and proper.

DATED: September 4, 2025.

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