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9 Attorneys for Petitioner

10 UNITED STATES DISTRICT COURT
11
12 SOUTHERN DISTRICT OF CALIFORNIA

13 MOHSEN YOUSEFFI NEJAD,

14 Petitioner-Plaintiff,

15 v.

16 Christopher LAROSE, Facility
17 Administrator at Otay Mesa Detention
18 Center, San Diego, California; Patrick
19 DIVVER, Field Office Director of San
20 Diego Office of Detention and Removal,
21 U.S. Immigrations and Customs
22 Enforcement; U.S. Department of
23 Homeland Security; Todd M. LYONS,
24 Acting Director, Immigration and Customs
Enforcement, U.S. Department of
Homeland Security; Kristi NOEM, in her
Official Capacity, Secretary, U.S.
Department of Homeland Security;
Pam BONDI, in her Official Capacity,
Attorney General of the United States;

Respondents-Defendants.

Case No.: **'25CV2425 AGS JLB**

Agency File No.: A 

**PETITION FOR WRIT OF HABEAS
CORPUS AND ORDER TO SHOW
CAUSE WITHIN THREE DAYS;
COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

Challenge to Unlawful Incarceration
Under Color of Immigration Detention
Statutes; Request for Declaratory and
Injunctive Relief

1 Petitioner MOHSEN YOUSEFFI NEJAD petitions this Court for a writ of habeas
2 corpus under 28 U.S.C. § 2241 to remedy Respondents’ detaining him unlawfully, and
3 states as follows:

4
5 **INTRODUCTION**

- 6 1. Petitioner Mohsen Youseffi Nejad (Mr. Nejad) is a seventy-one-year-old man
7 with various health conditions detained at the Otay Mesa ICE Detention Center in
8 San Diego, California.
- 9 2. He submits this habeas petition under 28 U.S.C. § 2241 for a judicial check on
10 Respondents’ unlawful revocation of his release and his detention without belief
11 that his removal from the United States is reasonably foreseeable.
- 12 3. In 2011, an immigration judge (“IJ”) granted Mr. Nejad deferral of removal
13 under the Convention Against Torture (“CAT”) on the basis that his conversion
14 to Christianity would subject him to torture in Iran. Shortly after this grant of
15 protection, he was released from detention and has lived a law-abiding peaceful
16 life for the past 14 years until his arrest on June 24, 2025. On that date, Mr. Nejad
17 was inexplicably arrested in his community near his home.
- 18 4. Mr. Nejad’s arrest would have only been permissible if Respondents could
19 demonstrate that removal could occur “in the reasonably foreseeable future” or if
20 he had violated release conditions—neither of which occurred here. See
21 Zadvydas v. Davis, 533 U.S. 678 (2001); 8 C.F.R. § 241.13(h)(4).
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1 5. Moreover, even assuming Respondents possessed theoretical authority to revoke
2 Mr. Nejad's release, the agency failed to meet mandatory procedural requirements,
3 including the obligation to establish "a significant likelihood that the [non-citizen]
4 may be removed in the reasonably foreseeable future" under 8 C.F.R. §241.13(i)(2)
5 and to provide him with notice of the specific reasons for revocation as 8 C.F.R. §
6 241.13(i)(3) requires. Respondents' actions were all the more egregious because
7 they occurred well beyond the ninety-day removal period established by law (see 8
8 U.S.C. § 1231(a)(1)(A)), and after Mr. Nejad had continued to live lawfully in his
9 community for nearly 15 years.
10

11 6. Due to these due process and regulatory violations of the law, Mr. Nejad seeks
12 declaratory and injunctive relief to compel his immediate release from the
13 immigration jail where he has been held by Respondents since being unlawfully
14 detained on June 24, 2025, without being provided any notice or opportunity to
15 be heard regarding whether his incarceration is justified.
16

17 7. Absent review in this Court, no other neutral adjudicator will examine Mr.
18 Nejad's plight: Respondents will continue—unchecked—to detain him
19 essentially indefinitely. He thus urges this Court to review the lawfulness of his
20 detention; declare that his detention is unlawful and order his immediate release,
21 or at a minimum that Respondents provide him a bond hearing complying with
22 the procedural requirements in Singh v. Holder, 638 F.3d 1196 (9th Cir. 2011).
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CUSTODY

8. Mr. Nejad is currently in Respondents' legal and physical custody. They are detaining him at the Otay Mesa ICE Detention Center. He is under Respondents' and their agents' direct control.

PARTIES

9. Petitioner Mohsen Youseffi Nejad is a 71-year-old citizen of Iran who was unlawfully detained on June 24, 2025. He was inexplicably detained nearly 15 years after he was granted deferral of removal under the CAT by an IJ and was released from custody in 2011.
10. Mr. Nejad is currently in Respondents' legal and physical custody at the Otay Mesa ICE Detention Center in San Diego, California. CoreCivic Inc., a Maryland corporation, operates that facility.
11. Respondent Patrick DIVVER is the Field Office Director of ICE in San Diego, California and is named in his official capacity. ICE is the component of the DHS that is responsible for detaining and removing noncitizens according to immigration law and oversees custody determinations. In his official capacity, he is the legal custodian of Petitioner.
12. Respondent Todd M. LYONS is the Acting Director of ICE and is named in his official capacity. Among other things, ICE is responsible for the administration and enforcement of the immigration laws, including the removal of noncitizens. In his official capacity as head of ICE, he is the legal custodian of Petitioner.

1 13. Respondent Kristi NOEM is the Secretary of the DHS and is named in her
2 official capacity. DHS is the federal agency encompassing ICE, which is
3 responsible for the administration and enforcement of the INA and all other laws
4 relating to the immigration of noncitizens. In her capacity as Secretary,
5 Respondent Noem has responsibility for the administration and enforcement of
6 the immigration and naturalization laws pursuant to section 402 of the Homeland
7 Security Act of 2002, 107 Pub. L. No. 296, 116 Stat. 2135 (Nov. 25, 2002); *see*
8 *also* 8 U.S.C. § 1103(a). Respondent Noem is the ultimate legal custodian of
9 Petitioner.
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11 14. Respondent Pam BONDI is the Attorney General of the United States and the
12 most senior official in the U.S. Department of Justice (DOJ) and is named in her
13 official capacity. She has the authority to interpret the immigration laws and
14 adjudicate removal cases. The Attorney General delegates this responsibility to
15 the Executive Office for Immigration Review (EOIR), which administers the
16 immigration courts and the BIA.
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18 15. Respondent Christopher LAROSE is the Warden of the Otay Mesa Detention
19 Center where Petitioner is being held. Respondent Christopher LaRose oversees
20 the day-to-day operations of the Otay Mesa Detention Center and acts at the
21 Direction of Respondents Divver, Lyons and Noem. Respondent Christopher
22 LaRose is a custodian of Petitioner and is named in their official capacity.
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JURISDICTION AND VENUE

16. This action arises under the United States Constitution and the Immigration and Nationality Act, 8 U.S.C. § 1101 et seq., INA § 101 et seq., to challenge Mr. Nejad's detention under the INA and any inherent or plenary powers the government may claim to continue holding him.

17. This Court has jurisdiction under 28 U.S.C. § 2241; Art. I, § 9, cl. 2 of the United States Constitution; and 28 U.S.C. § 1331, as Mr. Nejad is presently in Respondents' custody under the United States' color of authority, and such custody violates the United States' Constitution, laws, or treaties. Its jurisdiction is not limited by a petitioner's nationality, status as an immigrant, or any other classification. *See Boumediene v. Bush*, 553 U.S. 723, 747 (2008). This Court may grant relief under U.S. CONST. art. I, § 9, cl. 2; U.S. CONST. amends. V and VIII; 28 U.S.C. §§ 1361 (mandamus), 1651 (All Writs Act), 2241 (habeas corpus).

18. Specifically, this Court has jurisdiction under 28 U.S.C. § 2241 to review Mr. Nejad's detention. Federal district courts possess broad authority to issue writs of habeas corpus when a person is held "in custody in violation of the Constitution or laws or treaties of the United States" (28 U.S.C. § 2241(c)(3)), and this authority extends to immigration detention challenges that survived the REAL ID Act's jurisdictional restrictions.

1 19. Because Mr. Nejad seeks the traditional habeas remedy of release from allegedly
2 unlawful detention rather than additional administrative review of his underlying
3 claims, his petition presents precisely the type of threshold legality-of-detention
4 question that § 2241 was designed to address. *See INS v. St. Cyr*, 533 U.S. 289,
5 301 (2001); *see also Lopez-Marroquin v. Barr*, 955 F.3d 759, 759 (9th Cir. 2020)
6 (citing *Singh*, 638 F.3d at 1211-12)). And no court has ruled on the legality of
7 Mr. Nejad's detention.
8

9 20. Venue is proper in this District under 28 U.S.C. §§ 1391(b)(2) and (e)(1)
10 because a substantial part of the events or omissions giving rise to this claim have
11 happened here, Mr. Nejad is detained here, and his custodian resides here. Venue
12 is also proper under 28 U.S.C. § 2243 because Mr. Nejad's immediate custodian
13 resides in this District. *See Rumsfeld v. Padilla*, 542 U.S. 426, 451-52 (2004)
14 (Kennedy, J., concurring).
15

16 **STATEMENT OF FACTS**

17 21. Mr. Nejad is a 71-year-old Iranian citizen with the following serious health
18 conditions for which he takes medications and sees medical specialists regularly:
19 He is legally blind and has glaucoma, diabetes, high cholesterol, and
20 cardiovascular disease.

21 22. Mr. Nejad cannot safely navigate his surroundings without help and depends
22 entirely on his family for cooking, mobility, medication management, and
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1 personal care. Mr. Nejad has not been receiving all necessary treatment for his
2 conditions in detention and his eyesight and health conditions have worsened.

3 23. Prior to his detention, he lived in Lake Forest, California with his U.S. citizen
4 wife to whom he has been married for fifty years. He is also a devoted father to
5 his two U.S. citizen daughters, his immediate family is all in the U.S., and he has
6 many friends who also live in Lake Forest.
7

8 24. Mr. Nejad came to the U.S. on a student visa in 1979 and subsequently became a
9 lawful permanent resident in 1982.

10 25. Unfortunately, in 2007, Mr. Nejad found himself in severe financial difficulty,
11 made some poor decisions and was convicted in 2009 for transportation and
12 possession for sale of opium.
13

14 26. Mr. Nejad was then placed into removal proceedings in immigration court, in
15 which he was ordered removed in 2011. The IJ, however, granted Mr. Nejad
16 deferral of removal to Iran. The IJ found that because of Mr. Nejad's conversion
17 to Christianity, it was more likely than not that he would be tortured or killed if
18 returned to Iran.
19

20 27. Over the past 14 years, Mr. Nejad has lived a peaceful and law-abiding life with
21 his family, friends, and church community.
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1 28. On June 24, 2025, while Mr. Nejad and his wife were driving close to their
2 home, Border Patrol agents detained them and then unlawfully took Mr. Nejad
3 into custody without a warrant, notice or opportunity to be heard.

4 29. Mr. Nejad is suffering greatly in detention. Mr. Nejad is depressed, has anxiety,
5 has back pain, difficulty sleeping and his vision and other medical conditions are
6 worsening.
7

8 **REQUIREMENTS OF 28 U.S.C. § 2243**

9 30. The Court must grant the petition for writ of habeas corpus or issue an order to
10 show cause (OSC) to Respondents “forthwith,” unless the petitioner is not
11 entitled to relief. 28 U.S.C. § 2243. If an OSC is issued, the Court must require
12 Respondents to file a return “within *three days* unless for good cause additional
13 time, *not exceeding twenty days*, is allowed.” *Id.* (emphasis added).
14

15 31. Courts have long recognized the significance of the habeas statute in protecting
16 individuals from unlawful detention. The Great Writ has been referred to as
17 “perhaps the most important writ known to the constitutional law of England,
18 affording as it does a *swift* and imperative remedy in all cases of illegal restraint
19 or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).
20

21 32. Habeas corpus must remain a swift remedy. Importantly, “The statute itself
22 directs courts to give petitions for habeas corpus ‘special, preferential
23 consideration to insure expeditious hearing and determination.’” *Yong v. INS*, 208
24

1 F.3d 1116, 1120 (9th Cir. 2000) (internal citations omitted). The Ninth Circuit
2 warned against any action creating the perception “that courts are more
3 concerned with efficient trial management than with the vindication of
4 constitutional rights.” *Id.*

5
6 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

7 33. For habeas claims, exhaustion of administrative remedies is prudential, not
8 jurisdictional. *Hernandez v. Sessions*, 872 F.3d 976, 988 (9th Cir. 2017). A court
9 may waive the prudential exhaustion requirement if “administrative remedies are
10 inadequate or not efficacious, pursuit of administrative remedies would be a futile
11 gesture, irreparable injury will result, or the administrative proceedings would be
12 void.” *Id.* (quoting *Laing v. Ashcroft*, 370 F.3d 994, 1000 (9th Cir. 2004) (citation
13 and quotation marks omitted)). Petitioner asserts that exhaustion should be
14 waived because administrative remedies are (1) futile and (2) his continued
15 detention results in irreparable harm.
16

17 34. Exhausting administrative remedies here is futile – this action is only necessary
18 because ICE refuses to release Mr. Nejad and an IJ does not have jurisdiction to
19 redetermine Mr. Nejad’s custody.
20

21 35. Moreover, no statutory exhaustion requirements apply to Petitioner’s claim of
22 unlawful custody in violation of his due process rights, and there are no
23 administrative remedies that he needs to exhaust. *See Am.-Arab Anti-*
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1 *Discrimination Comm. v. Reno*, 70 F.3d 1045, 1058 (9th Cir. 1995) (finding
2 exhaustion to be a “futile exercise because the agency does not have jurisdiction
3 to review” constitutional claims); *In re Indefinite Det. Cases*, 82 F. Supp. 2d
4 1098, 1099 (C.D. Cal. 2000) (same).

5
6 36. More importantly, every day that Petitioner remains detained causes him harm
7 that cannot be repaired. His continued detention puts his physical and mental
8 health at greater risk, further warranting a finding of irreparable harm and the
9 waiver of the prudential exhaustion requirement. The Court must consider this in
10 its irreparable harm analysis of the effects on Petitioner as his detention continues
11 into the fourth month (as of the time of filing of this action). *See De Paz Sales v.*
12 *Barr*, No. 19-CV-07221-KAW, 2020 WL 353465, at *4 (N.D. Cal. Jan. 21, 2020)
13 (noting that the petitioner “continues to suffer significant psychological effects
14 from his detention, including anxiety caused by the threats of other inmates and
15 two suicide attempts,” in finding that petitioner would suffer irreparable harm
16 warranting waiver of exhaustion requirement).

17 18 **LEGAL FRAMEWORK**

19 37. Section 1231(a) of Title 8 governs the detention of individuals whom
20 immigration courts have ordered removed. The statute commands ICE to detain
21 these individuals for ninety days while it executes the removal order. See 8
22 U.S.C. § 1231(a)(2). The ninety-day removal period starts the moment the
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1 removal order becomes final. Absent an applicable exception, ICE must release
2 the person under supervision if it cannot complete removal within ninety days.

3 See 8 U.S.C. § 1231(a)(3).

4
5 38. Subsection 1231(a)(6) authorizes ICE to extend detention beyond the ninety-day
6 period, yet it bars indefinite custody. See Zadvydas v. Davis, 533 U.S. 678, 689
7 (2001) (limiting ICE’s authority to a period “reasonably necessary” to carry out
8 removal and prohibiting detention when removal is not “reasonably
9 foreseeable”).

10 39. Regulations allow ICE to release a non-citizen after the ninety-day removal
11 period if the agency determines that the non-citizen “would not pose a
12 danger to the public or a risk of flight, without regard to the likelihood of the
13 [non-citizen’s] removal in the reasonably foreseeable future.” 8 C.F.R.
14 § 241.13(b)(1).

15
16 40. ICE may withdraw release approval if it can effectuate removal “in the
17 reasonably foreseeable future” or if the non-citizen violates the release
18 conditions. 8 C.F.R. § 241.13(h)(4). ICE may revoke release only when “there is
19 a significant likelihood that the [non-citizen] may be removed in the reasonably
20 foreseeable future.” *Id.* § 241.13(i)(2). Upon revocation, ICE must notify the non-
21 citizen of the reasons for the revocation. *Id.* § 241.13(i)(3).

1 41. Moreover, under the Administrative Procedures Act (“APA”), an agency must
2 act in a manner that is not arbitrary or capricious. See 5 U.S.C. § 706(2)(A)
3 (directing courts to “hold unlawful and set aside agency action” that is arbitrary
4 and capricious); Dep’t of Com. v. New York, 139 S. Ct. 2551, 2569 (2019)
5 (requiring an agency to articulate a “satisfactory explanation” for its action,
6 “including a rational connection between the facts found and the choice made”).
7

8 42. Furthermore, immigration detention should not be used as a punishment and
9 should only be used when, under an individualized determination, a noncitizen is
10 a flight risk because they are unlikely to appear for immigration court or a danger
11 to the community. Zadvydas, 533 U.S. at 690.
12

13 43. “Freedom from imprisonment—from government custody, detention, or other
14 forms of physical restraint—lies at the heart of the liberty that [the Due Process]
15 Clause protects.” Id. “[T]he Due Process Clause applies to all ‘persons’ within
16 the United States, including aliens, whether their presence here is lawful,
17 unlawful, temporary, or permanent.” Id. at 693.
18

19 **FIRST CAUSE OF ACTION**

20 **Violation of Due Process U.S. Constitution Amendment V**

21 44. Mr. Nejad re-alleges and incorporates by reference, as if fully set forth herein, the
22 allegations in the paragraphs above.
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1 45. The Due Process Clause of the Fifth Amendment to the U.S. Constitution

2 prohibits the federal government from depriving any person of “life, liberty, or
3 property, without due process of law.” U.S. Const. Amend. V. Due process
4 protects “all ‘persons’ within the United States, including [non-citizens], whether
5 their presence here is lawful, unlawful, temporary, or permanent.” Zadvydas, 533
6 U.S. at 693.

7
8 46. Here, neither Mr. Nejad nor his counsel were advised by Respondents that they
9 sought to detain him. Moreover, Mr. Nejad was detained despite there being no
10 evidence that he is a danger to the community or a flight risk. No conditions had
11 changed since his release in 2011 – in fact, Mr. Nejad has only developed more
12 ties to the U.S. and has significant medical conditions that make him even less of
13 a flight risk now. Yet Mr. Nejad was detained without any opportunity to even be
14 heard on these issues.

15
16 47. Detention violates 8 U.S.C. § 1231 and the Due Process Clause of the
17 United States Constitution unless it is reasonably related to the government’s
18 purpose of preventing flight and protecting the community. Zadvydas, 533 U.S.
19 at 690-91.

20
21 48. Before being re-detained, Mr. Nejad lived in the community for 14 years in
22 compliance with the law. And he has received no process to determine whether
23 his re-detention is warranted.

1 49. Mr. Nejad is entitled to an individualized determination by impartial
2 adjudicators as to whether detention is justified based on danger or flight. See
3 Singh v. Holder, 638 F.3d 1196 (9th Cir. 2011); see also Mathews v. Eldridge,
4 424 U.S. 319, 333 (1976) (requiring notice and an opportunity to be heard before
5 deprivation of a legally protected interest).
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7 **SECOND CAUSE OF ACTION**

8 **Violation of Due Process Clause of the U.S. Constitution** 9 **Unlawful Detention – Removal Not Reasonably Foreseeable**

10 50. Mr. Nejad re-alleges and incorporates by reference, as if fully set forth herein,
11 the allegations in the paragraphs above.

12 51. Post-removal order detention violates 8 U.S.C. § 1231(a)(6) where removal is
13 not significantly likely to occur in the reasonably foreseeable future. See
14 Zadvydas, 533 U.S. at 701.

15 52. Detention where removal is not reasonably foreseeable also violates due process.

16 53. The ninety-day removal period ended in 2011. And ICE determined it could not
17 effectuate Mr. Nejad's removal and released him. Given that the government did
18 not then find—and in the intervening 14 years has not since found—a third
19 country for removal, Mr. Nejad has made an initial showing that his removal is
20 not significantly likely. Zadvydas, 533 U.S. at 701.
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22 54. Respondents cannot rebut this showing, as they have already held Mr. Nejad for
23 nearly 3 months. Mr. Nejad's re-detention under these circumstances violates 8
24

1 U.S.C. § 1231 and the Due Process Clause under the United States Constitution.

2 Mr. Nejad is entitled to immediate release.

3 **THIRD CAUSE OF ACTION**

4 **Violation of 5 U.S.C. § 706(a)(2)(A) and 8 C.F.R. § 241.13(i)(2)**
5 **Unlawful Revocation of Release**

6 55. Mr. Nejad re-alleges and incorporates by reference, as if fully set forth herein,
7 the allegations in the paragraphs above.

8 56. Mr. Nejad was previously detained by ICE and released in 2011 because his
9 removal could not occur. As he has complied with all laws of the U.S. since his
10 release, Respondents have the authority to revoke his release only if there is a
11 significant likelihood that they can remove him in the reasonably foreseeable
12 future. See 8 C.F.R. § 241.13(i)(2).

13 57. Respondents revoked Mr. Nejad's release without evidence that he can be
14 removed to a third country. Mr. Nejad has been detained nearly three months as
15 of the filing of the instant action, further demonstrating there is no likelihood of
16 him being removed in the reasonably foreseeable future.

17 58. Moreover, the governing regulations require Respondents to notify Mr. Nejad
18 of the reason for his re-detention. 8 C.F.R. § 241.13(i)(3). Respondents have not
19 complied with this obligation, nor did they provide him with an initial
20 interview at which he could respond to the purported reasons for revocation.
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1 59. Respondents' actions in failing to abide by their own regulations are arbitrary,
2 capricious, an abuse of discretion, and contrary to the Administrative Procedures
3 Act. 5 U.S.C. § 706(a)(2)(A). As such, Mr. Nejad is entitled to immediate release.
4

5 **PRAYER FOR RELIEF**

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

- 7 (1) Assume jurisdiction over this matter;
- 8 (2) Issue the writ of habeas corpus and order Respondents to show cause,
9 within three days of Mr. Nejad's filing this petition, why the relief he
10 seeks should not be granted; and set a hearing on this matter within five
11 days of Respondents' return on the order to show cause (*see* 28 U.S.C.
12 § 2243);
- 13 (3) Declare that Petitioner's detention without an individualized
14 determination violates the Due Process Clause of the Fifth Amendment;
- 15 (4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner
16 from custody;
- 17 (5) In the alternative, order a constitutionally adequate bond hearing
18 complying with the procedural requirements in Singh where DHS bears
19 the burden of justifying Petitioner's continued detention by clear and
20 convincing evidence and the neutral adjudicator takes into consideration
21 alternatives to detention and Petitioner's ability to pay a bond;
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1 (6) In the alternative, conduct an immediate bond hearing before this Court
2 where DHS bears the burden of justifying Petitioner's continued
3 detention by clear and convincing evidence and the Court takes into
4 consideration alternatives to detention and Petitioner's ability to pay a
5 bond;

6 (7) Issue an Order prohibiting the Respondents from transferring Petitioner
7 from the district without the court's approval;

8 (8) Award Petitioner attorney's fees and costs under the Equal Access to
9 Justice Act, and on any other basis justified under law; and

10 (9) Grant any further relief this Court deems just and proper.
11

12 Dated: September 16, 2025

Respectfully submitted,

13
14 By: /s/ Bashir Ghazialam
15 Bashir Ghazialam
16 Attorney for Petitioner
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VERIFICATION PURSUANT TO 28 U.S.C. 2242

I am submitting this verification on behalf of the Petitioner because I am Petitioner's attorney in this action. I have discussed with the Petitioner the events described in the Petition. Based on those discussions, I hereby verify that the factual statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Executed on this September 16, 2025, in San Diego, California.

/s/ Kirsten Zittlau

Kirsten Zittlau

Attorney for Petitioner