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7 **UNITED STATES DISTRICT COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**

9 HABIBULLAH MIRZAIE,

10 Plaintiff,

11 vs.

12 CHRISTOPHER LAROSE, warden of
13 Otay Mesa Detention Center
14 SIDNEY AKI, San Diego Field Office
15 Director, Immigration and Customs
16 Enforcement and Removal Operations
17 (“ICE/ERO”);
18 TODD LYONS, Acting Director of
19 Immigration Customs Enforcement
20 (“ICE”);
21 KRISTI NOEM, Secretary of the
22 Department of Homeland Security
23 (“DHS”);
24 PAMELA BONDI, Attorney General of
25 the United States,
26 U.S. DEPARTMENT OF HOMELAND
27 SECURITY;
28 U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT;

Respondents.

Case No.: '25CV2568 JO KSC

Agency Number: A 

PETITION FOR WRIT OF HABEUS
CORPUS

ORAL ARGUMENT REQUESTED

EXPEDITED HEARING
REQUESTED

PETITION FOR WRIT OF HABEUS CORPUS ORAL ARGUMENT REQUESTED EXPEDITED HEARING
REQUESTED - 1

INTRODUCTION

1. The Taliban are a radical insurgent group that the United States, alongside the legitimate government of Afghanistan, has been battling for nearly 20 years. In August of 2021, the Taliban successfully took over the entire country when they entered and took control of Kabul, the capital of Afghanistan.

2. The Hazara are an ethnic and religious minority in Afghanistan and are despised by the Taliban. The Hazara have been subjected to persecution and periodic genocide for generations. The Taliban were brutal toward the Hazara during their first rule and they have continued their persecution of the Hazara to this day. As an ethnic minority they speak Dari rather than Pashto, spoken by the Taliban. They practice Shia Islam, rather than the Sunni Islam promoted by the Taliban. Life for the Hazara was always difficult. Under the Taliban it is dangerous. The Petitioner believed that life in Afghanistan was no longer tenable and he left Afghanistan with his wife.

3. Mr. Mirzaie waited in Mexico City for three months for an appointment via the CBP One app to request entry. Mr. Mirzaie was granted humanitarian parole on March 20, 2024 by the respondents; he then applied for asylum before the U.S. immigration authorities in January of 2025.

1 4. Respondents commenced removal proceedings against him in
2 immigration court upon his initial entry. However, on September 10, 2024,
3 respondents and petitioner filed a joint motion to terminate his removal
4 proceedings because he had been granted humanitarian parole. This allowed petitioner
5 to file his asylum case with USCIS, to obtain work authorization and proceed with
6 his quest for asylum without any further involvement of EOIR.
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8 5. On September 19, 2025, petitioner was attempting to make a
9 delivery at Camp Pendleton Marine Base. When he approached the gate he
10 presented his ID and, without any explanation he was directed to move over to the
11 side of the lane. The Military Police arrived and blocked his car so he could not
12 leave. He asked several times if he was free to go. He was told he could not leave.
13 He presented proof of his work authorization and his pending asylum application
14 with USCIS which guarantees his presence in the United States until the
15 application is adjudicated. No base personnel ever explained what law he had
16 violated that allowed them to hold him their prisoner. He was told simply to wait
17 for ICE to arrive. He was held against his will for nearly four and a half hours until
18 ICE officers arrived. With no cause and no explanation and no warrant he was put
19 in handcuffs, put in the ICE vehicle and transferred to the ICE facility in
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1 downtown San Diego. He was subsequently served with a new Notice to Appear
2 which has commenced a new 240 removal proceedings.
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4 6. One of the benefits that petitioner enjoyed with parole and filing an
5 affirmative application with USCIS is that he effectively gets two chances to file
6 for asylum. One with USCIS and, if that is not successful, another *de novo*, chance
7 with a defensive application while in removal. This is a huge benefit for the
8 petitioner. Yet, in a deceptive sleight of hand Respondents now seek to eject Mr.
9 petitioner. Yet, in a deceptive sleight of hand Respondents now seek to eject Mr.
10 Mirzaie from his own asylum case, detain him, force him to seek only defensive
11 asylum and to remain in custody for that entire process. Respondents do so based
12 not on Mr. Mirzaie's personal circumstances or individualized facts, nor due to any
13 mistake made by previously dismissing his 240 removal proceedings, but because
14 of Respondents' interpretation of President Trump's whim and categorical
15 determination that, the Fifth Amendment notwithstanding, noncitizens are not
16 entitled to due process.
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21 7. But Respondents cannot evade the law so easily. The U.S.
22 Constitution requires the Respondents provide at least the rights available to him
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1 when he was granted Humanitarian Parole and when he filed his application for
2 asylum¹.

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4 8. Accordingly, to vindicate Petitioner's rights, this Court should grant
5 the instant petition for a writ of habeas corpus. Mr. Mirzaie asks this Court to find
6 that Respondents' attempt to detain him are arbitrary and capricious and in
7 violation of the law, and to immediately issue an order preventing his transfer out
8 of this district.
9

10 JURISDICTION

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12 9. This action arises under the Constitution of the United States and
13 the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 et. seq.
14

15 10. This court has subject matter jurisdiction under 28 U.S.C. § 2241
16 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the
17 United States Constitution (Suspension Clause).
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19 11. This Court may grant relief under the habeas corpus statutes, 28
20 U.S.C. § 2241 et. seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et. seq.,
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25 ¹ See, e.g., NBC News, Meet the Press interview of President Donald Trump (May 4, 2025),
26 <https://www.nbcnews.com/politics/trump-administration/read-full-transcript-president-donaldtrump-interviewed-meet-press-mod-rcna203514> (in response to a question whether noncitizens
27 deserve due process under the Fifth Amendment, President Trump replied "I don't know. It
28 seems—it might say that, but if you're talking about that, then we'd have to have a million or 2
million or 3 million trials.").

1 the All Writs Act, 28 U.S.C. § 1651, and the Immigration and Nationality Act, 8
2 U.S.C. § 1252(e)(2).
3

4 **VENUE**

5 12. Venue is proper because Petitioner is in Respondents' custody in
6 San Diego, California. Venue is further proper because a substantial part of the
7 events or omissions giving rise to Petitioner's claims occurred in this District,
8 where Petitioner is now in Respondent's custody. 28 U.S.C. § 1391(e).
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11 13. For these same reasons, divisional venue is proper under Local
12 Rule HC.1
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14 **REQUIREMENTS OF 28 U.S.C. §§ 2241, 2243**

15 14. The Court must grant the petition for writ of habeas corpus or
16 issue an order to show cause (OSC) to the Respondents "forthwith," unless the
17 petitioner is not entitled to relief. 28 U.S.C. § 2243. If an OSC is issued, the Court
18 must require Respondents to file a return "within three days unless for good cause
19 additional time, not exceeding twenty days, is allowed." *Id.*
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22 15. Courts have long recognized the significance of the habeas statute
23 in protecting individuals from unlawful detention. The Great Writ has been
24 referred to as "perhaps the most important writ known to the constitutional law of
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1 England, affording as it does a swift and imperative remedy in all cases of illegal
2 restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963).
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4 16. Petitioner is “in custody” for the purpose of § 2241 because he is
5 arrested and detained by Respondents.
6

7 **PARTIES**

8 17. Habibullah Mirzaie (“Petitioner”) is a 25-year-old citizen of
9 Afghanistan. He is a resident of San Diego, California, and is present within the
10 state of California as of the time of the filing of this petition.
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12 18. Respondent Christopher Larosse is the Warden of the Otay Mesa
13 Detention Center and is a legal custodian of Petitioner.
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15 19. Respondent Sydney Aki is the Field Office Director for the San
16 Diego Field Office, Immigration and Customs Enforcement and Removal
17 Operations (“ICE”). The San Diego Field Office is responsible for local custody
18 decisions relating to non-citizens charged with being removable from the United
19 States, including the arrest, detention, and custody status of non- citizens. The San
20 Diego Field Office’s area of responsibility includes San Diego, California and the
21 Otay Mesa Detention Center. Respondent Sidney Aki is a legal custodian of
22 Petitioner.
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1 20. Respondent Todd Lyons is the acting director of U.S. Immigration
2 and Customs Enforcement, and he has authority over the actions of respondent
3 Sidney Aki and ICE in general. Respondent Lyons is a legal custodian of
4 Petitioner.
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6 21. Respondent Kristi Noem is the Secretary of the Department of
7 Homeland Security (DHS) and has authority over the actions of all other DHS
8 Respondents in this case, as well as all operations of DHS. Respondent Noem is a
9 legal custodian of Petitioner and is charged with faithfully administering the
10 immigration laws of the United States.
11

12 22. Respondent Pamela Bondi is the Attorney General of the United
13 States, and as such has authority over the Department of Justice and is charged
14 with faithfully administering the immigration laws of the United States.
15

16 23. Respondent U.S. Immigration Customs Enforcement is the federal
17 agency responsible for custody decisions relating to non-citizens charged with
18 being removable from the United States, including the arrest, detention, and
19 custody status of non-citizens.
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21 24. Respondent U.S. Department of Homeland Security is the federal
22 agency that has authority over the actions of ICE and all other DHS Respondents.
23

1 25. This action is commenced against all Respondents in their official
2 capacities.
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4 5 **LEGAL FRAMEWORK** 6

7 26. The Refugee Act of 1980, the cornerstone of the U.S. asylum
8 system, provides a right to apply for asylum to individuals seeking safe haven in
9 the United States. The purpose of the Refugee Act is to enforce the “historic policy
10 of the United States to respond to the urgent needs of persons subject to
11 persecution in their homelands.” Refugee Act of 1980, § 101(a), Pub. L. No. 96-
12 212, 94 Stat. 102 (1980).
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15 27. The “motivation for the enactment of the Refugee Act” was the
16 United Nations Protocol Relating to the Status of Refugees, “to which the United
17 States had been bound since 1968.” *INS v. Cardoza-Fonseca*, 480 U.S. 421, 424,
18 432-33 (1987). The Refugee Act reflects a legislative purpose “to give ‘statutory
19 meaning to our national commitment to human rights and humanitarian concerns.’”
20
21 *Duran v. INS*, 756 F.2d 1338, 1340 n.2 (9th Cir. 1985).
22

23 28. The Refugee Act established the right to apply for asylum in the
24 United States and defines the standards for granting asylum. It is codified in
25 various sections of the INA.
26
27

1 29. The INA gives the Attorney General or the Secretary of Homeland
2 Security discretion to grant asylum to noncitizens who satisfy the definition of
3 “refugee.” Under that definition, individuals generally are eligible for asylum if
4 they have experienced past persecution or have a well-founded fear of future
5 persecution on account of race, religion, nationality, membership in a particular
6 social group, or political opinion and if they are unable or unwilling to return to
7 and avail themselves of the protection of their homeland because of that
8 persecution of fear. 8 U.S.C. § 1101(a)(42)(A).
9

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11 30. Although a grant of asylum may be discretionary, the right to
12 apply for asylum is not. The Refugee Act broadly affords a right to apply for
13 asylum to any noncitizen “who is physically present in the United States or who
14 arrives in the United States[.]” 8 U.S.C. § 1158(a)(1).
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16

17 31. Because of the life-or-death stakes, the statutory right to apply for
18 asylum is robust. The right necessarily includes the right to counsel, at no expense
19 to the government, see 8 U.S.C. § 1229a(b)(4)(A), § 1362, the right to notice of the
20 right to counsel, see 8 U.S.C. § 1158(d)(4), and the right to access information in
21 support of an application, see § 1158(b)(1)(B) (placing the burden on the applicant
22 to present evidence to establish eligibility.).
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1 32. Noncitizens seeking asylum are guaranteed Due Process under the
2 Fifth Amendment to the U.S. Constitution. *Reno v. Flores*, 507 U.S. 292, 306
3 (1993).
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5 33. Noncitizens who are applicants for asylum are entitled to a full
6 hearing in immigration court before they can be removed from the United States. 8
7 U.S.C. § 1229a. Consistent with due process, noncitizens may seek administrative
8 appellate review before the Board of Immigration Appeals of removal orders
9 entered against them and judicial review in federal court upon a petition for
10 review. 8 U.S.C. § 1252(a) *et seq.*
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13 34. Immigration detention is a form of civil confinement that
14 “constitutes a significant deprivation of liberty that requires due process
15 protection.” *Addington v. Texas*, 441 U.S. 418, 4253 (1979).
16
17

18 35. Immigration detention should not be used as a punishment and
19 should only be used when, under an individualized determination, a noncitizen is a
20 flight risk because they are unlikely to appear for immigration court or a danger to
21 the community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).
22
23

24 36. Humanitarian Parole must be terminated upon written notice after
25 an individualized determination that the humanitarian purposes no longer apply. 8
26 C.F.R. § 212.5(e)(2)(i).
27

FACTUAL BACKGROUND

37. Petitioner is a citizen of Afghanistan. He was born July 24, 2000 in the Province of Ghazni, Afghanistan.

38. Petitioner was threatened with death in Afghanistan by the Taliban and other terrorists in Afghanistan.

39. On or about March 20, 2024, pursuant to an invitation from the U.S. Government via the CBP One application, Petitioner came to the port of entry San Ysidro, California to seek asylum. On March 20, 2024, Respondents granted him and his wife humanitarian parole and released him into the United States, based on the individualized facts in his case, under 8 U.S.C. § 1182(d)(5) and released him from custody pursuant to the same statute.

40. On or about March 20, 2024, Respondents commenced removal proceedings against Petitioner under 8 U.S.C. § 1229a in San Diego, California.

41. On September 10, 2024, respondents and petitioner made a joint motion to terminate his removal proceedings to allow him to and his wife to pursue their claims affirmatively while they enjoyed their humanitarian parole. The order dismissing case was entered on September 11, 2024.

1 42. On information and belief, Petitioner regularly complied with and
2 appeared for ICE check-ins.
3

4 43. Petitioner applied for asylum with USCIS on January 14, 2025.
5 The acknowledgement of receipt sent to the petitioner from respondents in
6 paragraph 2 reads “You may remain in the United States until your asylum
7 application is decided.” The next step in his case is to attend an asylum interview
8 with USCIS.
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11 44. On April 03, 2024, Respondents issued work authorization to
12 Petitioner pursuant to 8 C.F.R. § 274a.12(c)(11).
13

14 45. On September 19, 2025, Mr. Mirzaie was attempting a delivery
15 for the delivery service that employed him. When he arrived at the entry gate the
16 gate guard did not allow him to proceed but asked him to pull to the side. Mr.
17 Mirzaie complied. Subsequently the Military Police arrived, blocked Mr. Mirzaie’s
18 car so he could not leave and held him against his will. He asked several times if
19 he could leave and the Camp Pendleton authorities refused. They informed him
20 that they had called ICE and he must remain there until ICE arrived. He was held
21 their prisoner for approximately four and a half hours.
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25 46. When ICE arrived, they placed Mr. Mirzaie in handcuffs put him
26 in their vehicle, and transported him to their downtown San Diego holding area. He
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1 prioritize civil immigration enforcement procedures including through the use of
2 mass detention.
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4 49. On information and belief, Respondents are detaining Petitioner
5 regardless of the individual facts and circumstances of his case.
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7 50. On information and belief, Respondents are using the immigration
8 detention system as a means to punish individuals for asserting rights under the
9 Refugee Act.
10

11 51. On information and belief, Petitioner has no criminal history.
12

13 **CLAIMS FOR RELIEF**

14 **COUNT ONE**

15 **Violation of Fifth Amendment Right to Due Process**

16 **Procedural Due Process**

17
18 52. Petitioner restates and realleges all paragraphs as if fully set forth
19 here.
20

21 53. The Due Process Clause of the Fifth Amendment to the U.S.
22 Constitution prohibits the federal government from depriving any person of “life,
23 liberty, or property, without due process of law.” U.S. Const. Amend. V. Due
24 process protects “all ‘persons’ within the United States, including [non-citizens],
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1 was never given a written notice that his parole was being terminated. He was not
2 given any particularized reason for why he was being placed into detention. He
3 was never presented with a warrant for his arrest. He was eventually transported to
4 Otay Mesa Detention Center. On September 23, 2025, four days after he was
5 detained, a new Notice to Appear was filed with the court. This act took
6 jurisdiction of his asylum application away from USCIS, basically denying his
7 petition without review or consideration. Mr. Mirzaie must now begin his asylum
8 application process again while in detention.

12 47. Mr. Mirzaie was never presented with a warrant for his arrest. The
13 ICE agents did not provide him any process. The ICE agents did not offer him any
14 opportunity to be heard prior to arresting and detaining him.

16 48. On January 20, 2025, President Donald Trump issued several
17 executive actions relating to immigration, including “Protecting the American
18 People Against Invasion,” an executive order (EO) setting out a series of interior
19 immigration enforcement actions. The Trump administration, through this and
20 other actions, has outlined sweeping, executive branch-led changes to immigration
21 enforcement policy, establishing a formal framework for mass deportation. The
22 “Protecting the American People Against Invasion” EO instructs the DHS
23 Secretary “to take all appropriate action to enable” ICE, CBP, and USCIS to
24

1 whether their presence here is lawful, unlawful, temporary, or permanent.”

2 *Zadvydas*, 533 U.S. at 693.

3
4 54. Due process requires that government action be rational and non-
5 arbitrary. *See U.S. v. Trimble*, 487 F.3d 752, 757 (9th Cir. 2007).

6
7 55. While asylum is a discretionary benefit, the right to apply is not. 8
8 U.S.C. § 1158(a)(1). Any noncitizen who is “physically present in the United
9 States or who arrives in the United States (whether or not at a designated port of
10 arrival . . .), irrespective of such [noncitizen’s] status, may apply for asylum.” *Id.*

11
12 56. Because the denial of the right to apply for asylum can result in
13 serious harm or death, the statutory right to apply is robust and meaningful. It
14 includes the right to legal representation, and notice of that right, *see id.* §§
15 1229a(b)(4)(A), 1362, 1158(d)(4); the right to present evidence in support of
16 asylum eligibility, *see id.* § 1158(b)(1)(B); the right to appeal an adverse decision
17 to the Board of Immigration Appeals and to the federal circuit courts, *see id.* §§
18 1229a(c)(5), 1252(b); and the right to request reopening or reconsideration of a
19 decision determining removability, *see id.* § 1229a(c)(6)-(7).

20
21 57. Applying for asylum with USCIS comes with a particular benefit.
22 It allows the petitioner a second opportunity to file for asylum should USCIS deny
23 the original application. This is a substantial benefit that the respondents initially
24

1 bestowed upon the petitioner when they agreed to dismiss his initial removal
2 proceedings. The detention of petitioner and refiling of an NTA with no
3 explanation and no apparent rational, other than to put another immigrant in
4 detention was a clear violation of Mr. Mirzaie's right to due process.
5

6
7 58. Here, Petitioner was not advised by DHS that they sought to
8 terminate his affirmative application in order to place him in detention and
9 removal, depriving him of the bundle of rights associated with his pending asylum
10 application. Because of his legal interest in his pending asylum application, this
11 violated due process. *See generally Mathews v. Eldridge*, 424 U.S. 319, 333 (1976)
12 (requiring notice and an opportunity to be heard before deprivation of a legally
13 protected interest).
14
15

16 COUNT TWO

17 Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A)

18 Not in Accordance with Law and in Excess of Statutory Authority

19 Unlawful Detention

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21
22 59. Petitioner restates and realleges all paragraphs as if fully set forth
23 here.
24

25 60. Under the APA, a court shall “hold unlawful and set aside agency
26 action” that is an abuse of discretion. 5 U.S.C. § 706(2)(A).
27

1 61. An action is an abuse of discretion if the agency “entirely failed to
2 consider an important aspect of the problem, offered an explanation for its decision
3 that runs counter to the evidence before the agency, or is so implausible that it
4 could not be ascribed to a difference in view or the product of agency expertise.”
5 *Nat’l Ass’n of Home Builders v. Defs. of Wildlife*, 551 U.S. 644, 658 (2007)
6 (quoting *Motor Vehicle Mfrs. Ass’n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*,
7 463 U.S. 29, 43 (1983)).

8 62. To survive an APA challenge, the agency must articulate “a
9 satisfactory explanation” for its action, “including a rational connection between
10 the facts found and the choice made.” *Dep’t of Com. v. New York*, 139 S. Ct. 2551,
11 2569 (2019) (citation omitted).

12 63. By categorically revoking Petitioner’s humanitarian parole and
13 transferring him to Otay Mesa Detention Center without consideration of his
14 individualized facts and circumstances, Respondents have violated the APA.

15 64. Respondents have made no finding that Petitioner is a danger to
16 the community.

17 65. Respondents have made no finding that Petitioner is a flight risk.

18 66. By detaining the Petitioner categorically, Respondents have
19 further abused their discretion because there have been no changes to his facts or
20

1 circumstances since the agency made its initial determination to parole him into the
2 United States that support detention.
3

4 67. Respondents have already considered Petitioner's facts and
5 circumstances and determined that he was not a flight risk or danger to the
6 community. There have been no changes to the facts that justify this revocation of
7 his parole.
8

9 **COUNT THREE**

10 **Violation of Fifth Amendment Right to Due Process**

11 **Procedural Due Process**

12 68. Petitioner restates and realleges all paragraphs as if fully set forth
13 here.
14

15 69. The Due Process Clause of the Fifth Amendment to the U.S.
16 Constitution prohibits the federal government from depriving any person of "life,
17 liberty, or property, without due process of law." U.S. Const. Amend. V. Due
18 process protects "all 'persons' within the United States, including [non-citizens],
19 whether their presence here is lawful, unlawful, temporary, or permanent."
20 Zadvydas, 533 U.S. at 693; accord Flores, 507 U.S. at 306.
21

22 70. Due process requires that government action be rational and non-
23 arbitrary. See U.S. v. Trimble, 487 F.3d 752, 757 (9th Cir. 2007).
24

1 71. While the government has discretion to detain individuals under 8
2 U.S.C. § 1226(a) and to revoke custody decisions under 8 U.S.C. § 1226(b), this
3 discretion is not “unlimited” and must comport with constitutional due process. *See*
4 *Zadvydas*, 533 U.S. at 698.
5

6 72. Here, Respondents have chosen to revoke Petitioner’s release in
7 an arbitrary manner and not based on a rational and individualized determination
8 of whether he is a safety or flight risk, in violation of due process. Because no
9 individualized custody revocation has been made and no circumstances have
10 changed to make Petitioner a flight risk or a danger to the community,
11 Respondents’ revocation of Petitioner’s release violates his right to procedural due
12 process.
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18 PRAYER FOR RELIEF

19 WHEREFORE, Petitioner respectfully requests this Court to grant the
20 following:
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22 (1) Assume jurisdiction over this matter;

23 (2) Issue an Order to Show Cause ordering Respondents to show
24 cause why this Petition should not be granted within three days;
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1 (3) Declare that Petitioner's detention without an individualized
2 determination violates the Due Process Clause of the Fifth Amendment;
3

4 (4) Declare that the denial of petitioner's affirmative asylum claim by
5 detaining him and commencing new 240 removal proceedings without an
6 individualized determination to return him to 240 removal proceedings violates the
7 Due Process Clause of the Fifth Amendment;
8

9 (5) Issue a Writ of Habeas Corpus ordering Respondents to release
10 Petitioner from custody;
11

12 (6) Issue an Order prohibiting the Respondents from transferring
13 Petitioner from the district without the court's approval;
14

15 (7) Award Petitioner attorney's fees and costs under the Equal Access
16 to Justice Act, and on any other basis justified under law; and
17

18 (8) Grant any further relief this Court deems just and proper.
19

20
21 Dated: September 29, 2025.

/s/ Brian J. McGoldrick
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