

1 KELI M. REYNOLDS (CA 227650)
2 OLMOS & REYNOLDS LAW GROUP, LLP
3 315 W. 9th St. Ste. 801
4 Los Angeles, CA 90015
5 (323) 951-0144
6 keli@olmosandreynolds.com

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

9 Raphael GEVORGYAN,

Case No. 25-cv-03408

10 Petitioner,

11 v.

12 Kristi NOEM, Secretary, U.S.
13 Department of Homeland Security;
14 Pamela BONDI, U.S. Attorney General;
15 Todd LYONS, Acting Director,
16 Immigration and Customs Enforcement;
17 Jaime RIOS, Acting Director, Los
18 Angeles Field Office, Immigration and
19 Customs Enforcement, Enforcement and
20 Removal Operations; Fereti SEMAIA,
21 Warden, Adelanto ICE Processing
22 Center; IMMIGRATION AND
23 CUSTOMS ENFORCEMENT; and U.S.
24 DEPARTMENT OF HOMELAND
25 SECURITY,

26 Respondents.

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

PETITIONER'S DHS NO:

27 A 

INTRODUCTION

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3 1. Petitioner Raphael Gevorgyan (“Petitioner”), by and through undersigned
4 counsel, files this petition for a writ of habeas corpus challenging the unlawful
5 revocation of his release on an order of supervision (“OSUP”) and his continued
6 detention without belief that his removal from the United States is reasonably
7 foreseeable.
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9 2. Petitioner is a citizen of the former Soviet Union. In 1990, he entered the
10 United States as a refugee with his family when he was only five years old. In or
11 about 2014, Petitioner adjusted status to that of a lawful permanent resident. On
12 January 5, 2016, he was convicted of violating felony California Penal Code §
13 245(a)(1) (assault with a deadly weapon not a firearm) and sentenced to four years in
14 prison.¹ On May 24, 2019, an Immigration Judge ordered Petitioner removed to
15 Armenia.
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18 3. Petitioner’s 2019 removal order remains unexecuted because he is stateless
19 and does not possess nor can he obtain necessary travel documents. On multiple
20 occasions, including in 2019 and most recently November 2025, the Consulate
21 General of Armenia has informed him and ICE that Petitioner is not a citizen of
22 Armenia and declined to issue him travel documents. As a result of their inability to
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27 ¹ Petitioner has other criminal history prior to this conviction, but on information and belief, the
28 conviction for assault with a deadly weapon was the only conviction charged in the Notice to
Appear.

1 secure travel documents during the 90-day period after he was ordered removed, ICE
2 released Petitioner on an OSUP in or about fall of 2019 when the same consulate
3 refused to issue Petitioner travel documents.
4

5 4. On November 10, 2025, Petitioner was arrested in Burbank, California, on
6 suspicion of violating California Penal Code § 148 (resisting arrest or obstruction)
7 during a traffic stop where his wife was the driver and he was the passenger. The
8 police initially mistook Petitioner for his brother, who had an active arrest warrant,
9 and released him after they confirmed his identity.
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12 5. Although no charges were filed in court as a result of the arrest in Burbank,
13 California, ICE detained Petitioner upon release from police custody on November
14 12, 2025. The ICE officers told Petitioner that they were revoking his OSUP and that
15 they intended to seek his removal to a third country. He was transferred to the
16 Adelanto ICE Processing Center, where he remains detained.
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19 6. On the same day of his re-detention, ICE officers provided Petitioner with a
20 letter advising him of the reason for the OSUP revocation, which also included an
21 advisal that he would “promptly” be provided with an interview where he would have
22 the opportunity to present evidence to show that his removal is unlikely. Petitioner
23 has been detained now for one month and no interview has taken place or even been
24 offered.
25

26 7. Petitioner is married to a U.S. citizen and together, they have two minor U.S.
27 citizen children.
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1 8. On information and belief, ICE had no particularized evidence that Petitioner
2 could be deported to any country at the time they detained him, and continue to have
3 no particularized evidence that Petitioner can be removed at this time.
4

5 9. Petitioner's detention on this basis violates his rights under the U.S.
6 Constitution. All individuals within the United States have constitutional rights.
7 "[T]he Due Process Clause applies to all 'persons' within the United States, including
8 aliens, whether their presence here is lawful, unlawful, temporary, or permanent."
9 *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). Petitioner's ongoing detention violates
10 his Fifth Amendment right to due process, the Immigration and Nationality Act, and
11 8 U.S.C. § 1231(a)(6) and its implementing regulations.
12
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14 10. Accordingly, Petitioner seeks a writ of habeas corpus requiring that he be
15 immediately released from custody and to enjoin Respondents from re-detaining him
16 absent order of this Court or absent the provision of an interview where Petitioner
17 can contest the reason for the revocation of his OSUP and demonstrate that his
18 removal is not reasonably foreseeable.
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21 JURISDICTION

22 11. Jurisdiction is proper and relief is available pursuant to 28 U.S.C. § 1331,
23 general federal question jurisdiction; 5 U.S.C. §§ 701 et seq., the Administrative
24 Procedure Act (APA); habeas jurisdiction pursuant to 28 U.S.C. § 2241 et seq.; Art
25 I., § 9, Cl. 2 of the United States Constitution (the Suspension Clause); and the
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1 common law. This action arises under the Due Process Clause of the Fifth
2 Amendment of the U.S. Constitution and the INA.

3
4 12. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241
5 et. seq., the Declaratory Judgment Act, 28 U.S.C. § 2001 et seq., and the All-Writs
6 Act, 28 U.S.C. § 1651.

7
8 13. Federal district courts have jurisdiction to hear habeas claims by noncitizens
9 challenging the lawfulness or constitutionality of DHS conduct. Federal courts are
10 not stripped of jurisdiction under 8 U.S.C. § 1252. See e.g., *Zadvydas v. Davis*, 533
11 U.S. 678, 687 (2001).

12
13 **VENUE**

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15 14. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484,
16 493- 500 (1973), venue lies in the United States District Court for the Central District
17 of California, the judicial district in which Petitioner is currently detained.

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19 15. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because
20 Respondents are employees, officers, and agencies of the United States, and because
21 a substantial part of the events or omissions giving rise to the claims brought herein
22 occurred in the Central District of California.

23
24 **REQUIREMENTS OF 28 U.S.C. § 2243**

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26 16. The Court must grant a petition for writ of habeas corpus or order Respondents
27 to show cause “forthwith,” unless a petitioner is not entitled to relief. 28 U.S.C. §
28

1 2243. If an order to show cause is issued, Respondents must file a return “within three
2 days unless for good cause additional time, not exceeding twenty days, is allowed.”

3
4 *Id.*

5 17. Habeas corpus is “perhaps the most important writ known to the constitutional
6 law . . . affording as it does a swift and imperative remedy in all cases of illegal
7 restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963). “The application
8 for the writ usurps the attention and displaces the calendar of the judge or justice who
9 entertains it and receives prompt action from him within the four corners of the
10 application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).
11
12

13
14 **PARTIES**

15 **Petitioner**

16 18. Petitioner (DHS No. ) was arrested by ICE agents on November
17 12, 2025, in Burbank, California. He has been in immigration detention since that
18 date. After arresting Petitioner, ICE did not set bond.
19

20 **Respondents**

21 19. Respondent Kristi Noem is the Secretary of U.S. Department of Homeland
22 Security (“DHS”). She is responsible for the implementation and enforcement of the
23 Immigration and Nationality Act and oversees Immigration and Customs
24 Enforcement (“ICE”), which is responsible for Petitioner’s detention. Ms. Noem has
25 ultimate custodial authority over Petitioner. She is sued in her official capacity.
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1 20. Respondent Pamela Bondi is the Attorney General of the United States. She is
2 responsible for the Department of Justice, of which the Executive Office for
3 Immigration Review and the BIA and immigration court system it operates, is a
4 component agency. She is sued in her official capacity.
5

6 21. Todd Lyons is the Acting Director of ICE, a federal law enforcement agency
7 within DHS. ICE's responsibilities include operating the immigration detention
8 system. In his capacity as ICE Acting Director, Respondent Lyons exercises control
9 over and is a custodian of persons held at ICE facilities nationally. He is Petitioner's
10 immediate custodian and is responsible for Petitioner's detention. He is sued in his
11 official capacity.
12

13 22. Respondent Jaime Rios is the Acting Director of the Los Angeles Field Office
14 of ICE's Enforcement and Removal Operations division. As such, he is the custodian
15 of all persons held at the ICE facilities within the Los Angeles Field Office. He is
16 Petitioner's immediate custodian and is responsible for Petitioner's detention. He is
17 sued in his official capacity.
18

19 23. Respondent Fereti Semaia is the Warden of the Adelanto ICE Processing
20 Center, Adelanto, California, where Petitioner is detained. He has immediate
21 physical custody of Petitioner. He is sued in his official capacity.
22

23 24. Respondent U.S. Department of Homeland Security ("DHS") is the federal
24 agency responsible for implementing and enforcing the INA, including the detention
25 and removal of noncitizens.
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25. Respondent Immigration and Customs Enforcement (“ICE”) is the agency within DHS responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

LEGAL FRAMEWORK

26. The INA prescribes three basic forms of detention for the vast majority of noncitizens in removal proceedings conducted pursuant to 8 U.S.C. § 1229a.

27. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in § 1229a removal proceedings before an IJ. Individuals covered by § 1226(a) detention are generally 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 subjected to an Expedited Removal order imposed pursuant to 8 U.S.C. § 1225(b)(1) and for certain other noncitizen applicants for admission to the U.S. who are deemed not clearly entitled to be admitted. *See* 8 U.S.C. § 1225(b)(2).

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

30. This case concerns the detention provision at 8 U.S.C. § 1231(a).

1 31. The Constitution establishes due process rights for “all ‘persons’ within the
2 United States, including [noncitizens], whether their presence here is lawful,
3 unlawful, temporary, or permanent.” *Hernandez v. Sessions*, 872 F.3d 976, 990 (9th
4 Cir. 2017) (quoting *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001)). These due process
5 rights are both substantive and procedural.
6

7
8 32. Section 1231(a) of 8 U.S.C. governs the detention of individuals who have
9 been ordered removed. The statute directs ICE to detain such individuals for 90 days
10 while carrying out a removal order. *See* 8 U.S.C. § 1231(a)(2). This 90-day removal
11 period begins when the removal order becomes final. Absent an applicable
12 exception, if ICE cannot remove a person within the 90-day removal period, they
13 are released from custody subject to supervision. 8 U.S.C. § 1231(a)(3).
14

15
16 33. Section § 1231(a)(6) of 8 U.S.C. permits detention beyond the normal 90-day
17 removal period, but even these exceptions do not authorize indefinite detention. *See*
18 *Zadvydas v. Davis*, 533 U.S. 678, 689 (2001) (limiting ICE’s detention authority to
19 a period “reasonably necessary” to carry out removal and deeming detention
20 impermissible when removal is not “reasonably foreseeable”).
21

22
23 34. The regulations permit release of a non-citizen subject to a removal order after
24 the 90-day removal period has elapsed if ICE determines that the non-citizen “would
25 not pose a danger to the public or a risk of flight, without regard to the likelihood of
26 the [non-citizen’s] removal in the reasonably foreseeable future.” 8 C.F.R.
27 § 241.13(b)(1). These released individuals are typically subject to an OSUP, as
28

1 Petitioner has been for the last six years. *See* 8 C.F.R. § 241.4(j); 8 C.F.R.
2 § 241.13(h).
3

4 35. ICE may withdraw its approval for the release of a non-citizen if it can
5 effectual the individual's removal from the United States "in the reasonably
6 foreseeable future" or if the individual fails to comply with the conditions of release.
7 8 C.F.R. § 241.13(h)(4). ICE may only revoke a non-citizen's release if "there is a
8 significant likelihood that the [non-citizen] may be removed in the reasonably
9 foreseeable future." *Id.* at § 241.13(i)(2). "Upon revocation, the [non-citizen] will
10 be notified of the reasons for revocation of his [] release." *Id.* at § 241.13(i)(3).
11

13 36. Respondents may remove a non-citizen to a third country (*i.e.*, a country in
14 which the non-citizen does not hold citizenship) if removal to their country of
15 citizenship is impractical, inadvisable or impossible. *See* 8 U.S.C.
16 § 1231(b)(2)(E)(ii). However, DHS is barred from removing a non-citizen to a
17 country where the non-citizen's life or freedom would be threatened because of five
18 protected grounds. *Id.* at § 1231(b)(3)(A). In addition, DHS is barred from deporting
19 a non-citizen to a country where they face a threat of torture. *See* 8 C.F.R. §§ 208.16-
20 208.18.
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24 FACTS

25 37. Petitioner has resided in the United States since 2000 when he was only 5 years
26 old. He entered the country as a refugee along with his parents and siblings.
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1 38. Petitioner is married to a U.S. citizen and together, they have two minor U.S.
2 citizen children.

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4 39. Upon information and belief, in 2014, Petitioner was placed in removal
5 proceedings pursuant to 8 U.S.C. § 1229a and adjusted status to that of a lawful
6 permanent resident.

7
8 40. On January 15, 2016, Petitioner was convicted of violating California Penal
9 Code (“Cal. PC”) § 245(a)(1) (assault with a deadly weapon not a firearm), a felony,
10 and sentenced to four years in prison. Upon his release from state prison, Petitioner
11 was again placed in removal proceedings pursuant to 8 U.S.C. § 1229a. On
12 information and belief, Petitioner was charged with removal under 8 U.S.C. §
13 1227(a)(2)(A)(iii) (aggravated felony conviction) based on his 2016 Cal. PC §
14 245(a)(1) conviction. The immigration judge sustained the charge of removability
15 and on May 24, 2019, ordered Petitioner removed to Armenia.

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18 41. Shortly after his removal order, ICE initiated the process to execute
19 Petitioner’s removal order, but was unsuccessful. On information and belief, the
20 Consulate General of Armenia (“Consulate General”) responded to correspondence
21 from ICE in 2019 after he was ordered removed, informing them that Petitioner is
22 not a citizen of Armenia, and declining to issue travel documents. Because Petitioner
23 was born in the former Soviet Union, he is considered stateless.
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1 42. On information and belief, in or about fall of 2019, ICE officials released
2 Petitioner with an OSUP after it could not execute the removal order during the 90-
3 day removal period. ICE provided Petitioner a new OSUP on June 12, 2024.
4

5 43. On November 10, 2025, Petitioner was arrested in Burbank, California, on
6 suspicion of violating Cal. PC § 148 (resisting arrest/obstruction) during a traffic stop
7 where his wife was the driver and he was the passenger. The police initially mistook
8 Petitioner for his brother, who had an active arrest warrant. No criminal charges were
9 filed in court as a result of his arrest.
10
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12 44. When the Burbank Police Department released Petitioner on November 12,
13 2025, ICE was waiting for him. The ICE officers told Petitioner that they were
14 revoking his OSUP and that they intended to seek his removal to a third country. He
15 was transferred to the Adelanto ICE Processing Center, where he remains detained.
16

17 45. On the same day of his re-detention, ICE officers provided Petitioner with a
18 letter advising him of the reason for the OSUP revocation, which also included an
19 advisal that he would “promptly” be provided with an interview where he would have
20 the opportunity to present evidence to show that his removal is unlikely.
21

22 46. Petitioner has been detained now for one month and no interview has taken
23 place or even been offered.
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25 47. Upon information and belief, following Petitioner’s arrest and transfer to the
26 ICE Adelanto Processing Center, ICE issued a custody determination to continue
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1 Petitioner's detention without an opportunity to post bond or be released on other
2 conditions.

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4 48. While ICE officers indicated upon his arrest that the agency would seek his
5 removal to a third country, the deportation officer assigned to Petitioner's case in the
6 detention facility indicated that the agency continues to seek his removal to Armenia.

7
8 49. On November 26, 2025, after Petitioner was detained, his mother, Ripsime
9 Arutyunyan, attended an appointment at the Armenian Consulate in Glendale,
10 California. She inquired with the consular officer whether the Consulate would issue
11 a passport or other travel documents for Petitioner. The consular officer told
12 Petitioner's mother that they would not because they had no record of Petitioner and
13 could not just grant citizenship to him.
14

15
16 **FIRST CLAIM FOR RELIEF**

17 **Unlawful Revocation of Release**

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19 50. Petitioner incorporates by reference the allegations of fact set forth in the
20 preceding paragraphs.

21 51. Petitioner was previously detained by ICE and released because his removal
22 could not be effectuated. If he has complied with the conditions of this OSUP,
23 Respondents have the authority to revoke his release only if there is a significant
24 likelihood that they can remove him in the reasonably foreseeable future. *See* 8
25 C.F.R. § 241.13(i)(2).
26
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1 52. Respondents revoked Petitioner's release without evidence that he could be
2 deported to any country.

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4 53. Respondents' actions are arbitrary, capricious, an abuse of discretion, and
5 contrary to law. 5 U.S.C. § 706(a)(2)(A). Petitioner is entitled to immediate release
6 on an OSUP.

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8 **SECOND CLAIM FOR RELIEF**

9 **Violation of the Procedures for Revocation of Release**

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11 54. Petitioner incorporates by reference the allegations of fact set forth in the
12 preceding paragraphs.

13
14 55. The governing regulations require Respondents to not only notify Petitioner of
15 the reason for his re-detention, but also to provide him with "an initial informal
16 interview *promptly*" after his re-detention, where he may submit evidence to show
17 that his removal is unlikely or that his OSUP has not been violated. 8 C.F.R. §
18 241.13(i)(3) (emphasis added). While Respondents have provided Petitioner with a
19 purported reason for his re-detention, they have yet to provided him with an initial
20 interview at which he can respond to the purported reason for revocation or
21 demonstrate that his removal is unlikely. *Cf. id.* As such, Petitioner is entitled to
22 immediate release on OSUP until ICE can provide the minimal process required by
23 the regulation.
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THIRD CLAIM FOR RELIEF

Unlawful Detention Where Removal Is Not Reasonably Foreseeable

56. Petitioner incorporates by reference the allegations of fact set forth in the preceding paragraphs.

57. Post-removal order detention violates 8 U.S.C. § 1231(a)(6) where removal is not significantly likely to occur in the reasonably foreseeable future. *See also Zadvydas v. Davis*, 533 U.S. 678 (2001).

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

59. Petitioner was already detained during the 90-day removal period, until ICE determined it could not effectuate removal and released him on an OSUP. Given that Petitioner remains stateless more than six years later, Petitioner has made an initial showing under *Zadvydas* that his removal is not significantly likely. *Id.* at 701. Respondents cannot rebut this showing, as they do not have any individualized evidence to believe that Petitioner's removal is reasonably foreseeable.

60. Petitioner's re-detention under these circumstances violates Section 1231 of 8 U.S.C. and the Due Process Clause under the U.S. Constitution.

61. Petitioner is entitled to immediate release on an OSUP.

FOURTH CLAIM FOR RELIEF

Unlawful Detention Without Individualized

Determinations of Danger or Flight Risk

62. Petitioner incorporates by reference the allegations of fact set forth in the preceding paragraphs.

63. Detention violates Section 1231 of 8 U.S.C. and the Due Process Clause of the U.S. Constitution unless it is reasonably related to the government's purpose of preventing flight and protecting the community. *Zadvydas*, 533 U.S. at 690-91.

64. Before being re-detained, Petitioner lived in the community for more than six years. During that time, he lived with his wife and children and had no arrests for violent offenses. Petitioner has received no process to determine if his re-detention is warranted.

65. Petitioner is entitled to an individualized determination by impartial adjudicators as to whether detention is justified based on danger or flight risk.

FIFTH CLAIM FOR RELIEF

Unlawful Removal To A Third Country

66. Petitioner incorporates by reference the allegations of fact set forth in the preceding paragraphs

67. Notwithstanding the statutory and regulatory prohibitions on removing non-citizens to countries where they face potential persecution or torture, on March 30, 2025, Respondent Noem issued a memo entitled, "Guidance Regarding Third

Country Removals” (available at: [https://immigrationlitigation.org/wp-content / uploads/2025/04/43-1-Exh-A-Guidance.pdf](https://immigrationlitigation.org/wp-content/uploads/2025/04/43-1-Exh-A-Guidance.pdf)). This memo states that if the United States has received “diplomatic assurances” from a third country that non-citizens removed to that country will not be persecuted or tortured, DHS may remove that non-citizen “without the need for further procedures.”

68. The procedure laid out in this memo violates the statutory and regulatory provisions requiring Respondents to provide a non-citizen with a forum to demonstrate an individualized risk of torture or persecution in a specific country. The memo purports to rely on blanket assurances from third countries that non-citizens generally will not be tortured or persecuted to circumvent the obligation to determine if an individual non-citizen faces a risk of torture or persecution.

69. To the extent that Respondents are detaining Petitioner with the intent to remove him to a third country without notice or the opportunity to demonstrate that he is at a particularized risk of torture or persecution in that third country, the detention is unlawful.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully ask that this Court take jurisdiction over this matter and grant the following relief:

- a. Assume jurisdiction over this matter;
- b. Order that Petitioner shall not be transferred outside of the Central District of California while this petition is pending;

- c. Issue an Order to Show Cause ordering Respondents to show cause within three days why this Petition should not be granted;
- d. Declare that Petitioner's detention is unlawful;
- e. Issue a Writ of Habeas Corpus ordering Respondents to immediately release Petitioner from custody on an OSUP;
- f. Enjoin Respondents from revoking Petitioner's release unless they have individualized evidence that his removal is reasonably foreseeable;
- g. Enjoin Respondents from revoking Petitioner's release without providing him a determination by an impartial adjudicator that his detention is justified based on danger or flight risk, which cannot be sufficiently addressed by alternative conditions of release and/or supervision, at which hearing Respondents will bear the burden of proof of demonstrating that Petitioner is a flight risk or a danger to the community;
- h. Enjoin Respondents from re-detaining Petitioner without first notifying him of the reasons for the revocation of his release, providing him with an opportunity to rebut those reasons, and providing him with a prompt interview as required by regulation;
- i. Enjoin Respondents from removing Petitioner to a third country without sufficient notice and opportunity to demonstrate that he faces a specific risk of torture or persecution in that third country;

- 1 j. Award Petitioner attorney's fees and costs under the Equal Access to
2 Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other
3 basis justified under law; and
4
5 k. Grant any other and further relief that this Court deems just and proper.
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8

9 DATED: December 16, 2025

s/ Keli M. Reynolds
KELI M. REYNOLDS
Olmos & Reynolds Law Group, LLP
Attorney for Petitioner

VERIFICATION

I, Keli M. Reynolds, declare as follows:

I am an attorney admitted to practice law in the State of California.

Because many of the allegations of this Petition require a legal knowledge not possessed by the Petitioner, I am making this verification on his behalf.

I have read the foregoing Petition for Writ of Habeas Corpus and know the contents thereof to be true to my knowledge, information, or belief.

I certify under penalty of perjury that the foregoing is true and correct and that this declaration was executed on December 16, 2025.

s/ Keli M. Reynolds
KELI M. REYNOLDS
Olmos & Reynolds Law Group, LLP
Attorney for Petitioner