

Nicholas Paul, Esq.
Partnership for the Advancement of New Americans (PANA)
PO Box 50189, San Diego, CA, 92105
(619) 363-0241
Nick@panasd.org
Pro Bono Counsel for the Plaintiff

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

Jose Angel GIRON RODAS

Case No.: 3:26-cv-03535-JAO-JAC

Petitioner-Plaintiff,

vs.

**TRAVERSE IN SUPPORT OF
WRIT OF HABEAS CORPUS
UNDER 28 U.S.C. § 2241**

Christopher J. LAROSE, in his official
capacity as Warden of Otay Mesa
Detention Center; Patrick DIVVER,
Field Office Director of San Diego
Office of Detention and Removal; Todd
LYONS, in his official capacity as
Acting Director of ICE; Markwayne
MULLIN, in his official capacity as
Secretary of Homeland Security; Daren
K. MARGOLIN as Acting Director of
EOIR, and Todd BLANCHE, in his
capacity as acting U.S. Attorney General

Agency File No.:

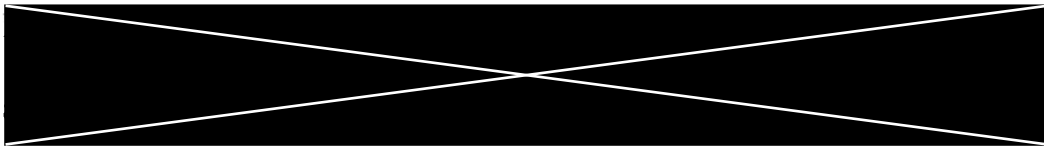


Respondent-Defendants.

I. INTRODUCTION

1. Petitioner, Jose Angel GIRON RODAS, entered the United States without inspection near Douglas, Arizona on July 25, 2003. For over 20 years, Petitioner lived in the United States without incident. He married, found steady work in the construction industry and became an active member of the Church of Jesus Christ and Latter-Day Saints in Los Angeles, California.
2. On May 23 2024, Immigration and Customs Enforcement (ICE) arrested Petitioner at a Border Patrol checkpoint near Dulzura, CA. Petitioner pled guilty to a single felony charge of Transportation of Certain Aliens under 8 U.S.C. § 1324(a)(1)(A)(ii) and was sentenced to time served (255 days) with one year of supervised release. Petitioner was transferred to Department of Homeland Security (DHS) custody on January 10, 2025.
3. Petitioner has been under Respondents custody for over 17 months and no neutral decisionmaker has conducted a hearing to determine whether this lengthy incarceration is warranted based on danger or flight risk.¹
4. Petitioner suffers from severe medical conditions including hypertension,

¹ Petitioner requested a bond hearing on March 10, 2025 and July 3, 2025. At both bond hearings, the immigration judges did not do an analysis of “petitioners danger” or “flight risk”, instead they categorically denied bond based on lack of jurisdiction



5. Petitioner therefore respectfully requests that this Court 1) Issue a writ of habeas corpus, 2) Enjoin Respondents from transferring Petitioner outside the jurisdiction of the United States District Court for the Southern District of California pending the resolution of this case, 3) Order Respondents to immediately release Petitioner from immigration detention; 4) Alternatively, conduct an immediate bond hearing where DHS bears the burden of justifying Petitioner's continued detention by clear and convincing evidence; 5) Award reasonable attorney's fees and costs pursuant to the Equal Access to Justice Act, 5 U.S.C. 504 and 28 U.S.C. 2412; 6) Grant such further relief as the Court deems just and proper.

II. Petitioner does not deny that he is mandatorily detained under 8 under U.S.C. § 1226(c)

6. Petitioner was convicted of 8 U.S.C. § 1324(a)(1)(A(ii), the transportation of certain aliens, on January 10, 2025. Petitioner's conviction falls within the mandatory detention provision of 8 U.S.C §

1 1226(c). The question is not whether petitioner is detained under the right
2 authority, it is whether the prolonged detention of individuals like the
3 Petitioner violates due process.
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6 **III. Petitioners detention under 8 U.S.C § 1226(c) violates his Due**
7 **Process Rights**
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10 7. In *Demore*, the Supreme Court rejected a facial challenge to mandatory
11 detention under § 1226 (c). 538 U.S. at 527-31. However numerous
12 courts throughout the country, particularly here in the Ninth Circuit have
13 found that 'the Due Process Clause imposes some form of
14 'reasonableness' limitation upon the duration of detention... under [section
15 1226(c)]." *Loba L.M.*, 2025 U.S. Dist. LEXIS 204345, 2025 WL
16 2939178, at *5 (quoting *Reid v. Donelan*, 17 F.4th 1, 7 (1st Cir. 2021);
17 citing *Black v. Decker*, 103 F.4th 133, 138 (2d Cir. 2024) ("[concluding]
18 that a noncitizen's constitutional right to due process precludes his
19 unreasonably prolonged detention under section 1226 (c) without a bond
20 hearing"); *German Santos v. Warden Pike Cnty. Corr. Facility*, 965 F.3d
21 203, 209-10 (3d Cir. 2020) (holding that after *Demore* and *Jennings*,
22 petitioners detained pursuant to § 1226 (c) can still bring as-applied
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1 challenges to their detention and that due process affords them a bond
2 hearing once detention becomes unreasonable)). "[E]ssentially all district
3 courts that have considered the issue agree that prolonged mandatory
4 detention pending removal proceedings, without a bond hearing, 'will—at
5 some point—violate the right to due process.'" *Martinez v. Clark*, No.
6 2:18-cv-01669-RAJ, 2019 U.S. Dist. LEXIS 197895, 2019 WL 5968089,
7 at *6 (W.D. Wash. May 23, 2019)." *Abdul-Samed v. Warden*, Case No.
8 1:25-cv-00098-SAB-HC, 2025 U.S. Dist. LEXIS 142973 2025 WL
9 2099343, at *5 (E.D. Cal. July 25, 2025) (quoting *Demore*, 538 U.S. at
10 532 (Kennedy, J., concurring)); *see also Nielsen v. Preap*, 586 U.S. 392,
11 420, 139 S. Ct. 954, 203 L. Ed. 2d 333 (2019) ("Our decision today on
12 the meaning of [§ 1226 (c)] does not foreclose as-applied challenges . . .
13 ."); *Reid v. Donelan*, 17 F.4th 1, 7 (1st Cir. 2021) ("we adhere to the
14 notion that the Due Process Clause imposes some form of reasonableness
15 limitation upon the duration of detention under section 1226 (c)")
16 (cleaned up); *Black*, 103 F.4th at 149 (noting that the Supreme Court
17 "said nothing about whether due process may *eventually* require a
18 hearing") (emphasis in original); *German Santos v. Warden*, 965 F.3d
19 203, 209-10 (3rd Cir. 2020) (holding that noncitizens detained
20 under § 1226 (c) may bring as-applied due process challenges).

1 8. Here in the Southern District of California, Courts have continuously
2 found that prolonged detention without a bond hearing violates detainees
3 Due Process rights, even when detained under 1226 (c). *See Zarei v.*
4 *Larose*, No. 26-CV-2932 JAO (AHG), 2026 U.S. Dist. LEXIS 111081
5 (S.D. Cal. May 19, 2026), *Maldonado-Romero v. Warden of Imperial*
6 *Reg'l Det. Facility*, No. 3:26-cv-02366-RBM-SBC, 2026 U.S. Dist.
7 LEXIS 106196 (S.D. Cal. May 13, 2026), *Derbew v. LaRose*, No. 26-
8 CV-2803 JAO (DEB), 2026 U.S. Dist. LEXIS 115934 (S.D. Cal. May
9 22, 2026) (where prolonged detention under 1225b violated the Due
10 process clause), *Blake v. Mullin*, No. 3:26-cv-00844-BTM-SBC, 2026
11 U.S. Dist. LEXIS 73989, 2026 WL 913130, at *2 (S.D. Cal. Apr. 2,
12 2026). Petitioners' detention of 17 months without a bond hearing is
13 unreasonable.
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18 9. Moreover, given the Petitioners extremely severe medical conditions and
19 need for intensive specialized treatment, fleeing prior to or during [his]
20 removal proceedings is extremely unlikely. As mentioned in the original
21 complaint, Petitioner has submitted dozens of requests for medical
22 treatment at the Otay Mesa Detention Center and has provided a sworn
23 declaration where he describes not being able to exist without extreme
24 pain. Even if this court were to adopt the reasoning in *Farhiat* and
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1 *Demore*, Petitioners continued detention does not serve the purpose of
2 preventing flight because Petitioner is already in such a weakened state,
3 that intensive medical care is a necessity for survival and flight is
4 unlikely.
5

6 **IV. Petitioner has been subject to unconstitutionally prolonged**
7 **detention**
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9 10. Courts have applied different tests to analyze whether a noncitizen's
10 detention has become unconstitutionally prolonged. Here, Respondents
11 suggest that the Court apply the three-factor test of *Lopez v. Garland*, 631
12 F. Supp. 3d 870, 878 (E.D. Cal. 2022). Under this test, the Court
13 considers "the total length of detention to date, the likely duration of
14 future detention, and the delays in the removal proceedings caused by the
15 petitioner and the government." *Id.*
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18 11. In Petitioners original Habeas filing, he suggested the more
19 comprehensive six factor analysis from *Banda v. McAleenan*, 385 F.
20 Supp. 3d 1099, 1105 (W.D. Wash. 2019), which also includes the three
21 factors analyzed in the *Lopez* test.
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24 12. Petitioner believes the *Banda* test is more appropriate here, because of
25 the unique facts of this case. Unlike the *Lopez* test, the *Banda* test
26 analyzes "Conditions of Confinement". This issue, especially as it relates
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1 to petitioners' medical treatment in detention/ lack thereof, gets to the
2 unreasonableness of Petitioners prolonged detention at the Otay Mesa
3 Detention Center. Immigration detention is "civil" (as opposed to
4 criminal), meaning that it should not be punitive in nature. To this day,
5 Petitioner continues to suffer from excruciating pain from 
6  and other colorectal conditions. Petitioner is not receiving
7 the appropriate medical treatment while in Immigration Detention.
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10 13. Notably, Respondents counsel does not address any of the horrid
11 conditions of confinement elevated by the petitioner through his sworn
12 declaration and grievances against CoreCivic and their medical team.
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14 14. If the *Banda* test were adopted by this Court for this case, the Conditions
15 of Confinement factor would favor Petitioner.
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17 15. Below, I address the three factors elevated by Respondent in their reply.
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19 **a) Total Length of Detention**

20 16. "In general, '[a]s detention continues past a year, courts become
21 extremely wary of permitting continued custody absent a bond
22 hearing.'" *Gonzalez v. Bonnar*, Case No. 18-cv-05321-JSC, 2019 U.S.
23 Dist. LEXIS 12636, 2019 WL 330906, at *3 (N.D. Cal. Jan. 25,
24 2019) (finding petitioner who had been detained for approximately 12
25 months was entitled to bond hearing in § 1226(c) case).
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1 17. The Petitioner in this case, has been detained for over 17 months.

2 18. According to the Respondents, Petitioner's 17 months of detention is an
3 insufficient amount of time for a "prolonged detention" finding.
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5 Respondents highlight several cases in the Southern District where the
6 Court found that detention was prolonged at three years, two-and-a half
7 years, and two years respectively. *See Sanchez-Rivera v. Matuszewski*,
8 No. 22-cv-1357-MMA-JLB, 2023 WL 139801, at *6 (S.D. Cal. Jan. 9,
9 2023) (detained for three years); *Durand v. Allen*, 2024 WL 711607, at *
10 (over two-and-a half years); *Yagao v. Figueroa*, No. 17-cv-2224-AJB-
11 MDD, 2019 WL 1429582, at *2 (S.D. Cal. Mar. 29, 2019) (two years).
12

13 However, the examples provided by Respondents do not set a minimum
14 standard for a prolonged detention finding. In fact, there is a growing
15 number of cases where detentions of less than 17 months without a bond
16 hearing violates Due Process.²
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21 ² *See, e.g., Zarei v. Larose*, No. 26-CV-2932 JAO (AHG), 2026 U.S. Dist. LEXIS 111081 (S.D.
22 Cal. May 19, 2026) (14 months), *Abdul Kadir v. Larose*, Case No.: 25cv1045-LL-MMP, 2025
23 U.S. Dist. LEXIS 203614, 2025 WL 2932654, at *5 (S.D. Cal. Oct. 15, 2025 (13 months
24 detained), *Black v. Dir. Thomas Decker*, 103 F.4th at 137-38 (2d Cir. 2024), (affirming district
25 court judgment ordering bond hearing for petitioner detained seven months), *Mingzhi Gao v.*
26 *Larose*, No. 25-CV-2084-RSH-SBC, 2025 U.S. Dist. LEXIS 190572, 2025 WL 2770633, at *5
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1 19. Petitioners' detention of over 17 months without a bond hearing weighs
2 this factor in Petitioners favor.

3
4 **b) Likely Duration of Future Detention**

5 20. The second factor requires consideration of "how long the detention is
6 likely to continue absent judicial intervention; in other words, the
7 anticipated duration of all removal proceedings—including
8 administrative and judicial appeals." *Banda*, 385 F. Supp. 3d at 1119.

9
10 21. Courts throughout the country have acknowledged the unpredictability of
11 immigration court proceedings and the variances in length of detention.
12 "While the Court cannot definitively determine the duration of
13 petitioner's future detention, based on the current record, it appears likely
14 petitioner will face many more months and potentially years in detention,
15 'especially if there is a petition for review before the Court of Appeals.'
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20 (S.D. Cal. Sept. 26, 2025) ("The Court finds that Petitioner's detention for over 10 months
21 without a bond hearing became unreasonable and violates due process."); *Amado v. United*
22 *States Dep't of Just.*, No. 25-CV-2687-LL-DDL, 2025 U.S. Dist. LEXIS 217453, 2025 WL
23 3079052, at *6 (S.D. Cal. Nov. 4, 2025) ("Courts have found detention over seven months
24 without a bond hearing weighs toward a finding that it is unreasonable."); *Masood v. Barr*, No.
25 19-CV-07623-JD, 2020 U.S. Dist. LEXIS 4809, 2020 WL 95633, at *3 (N.D. Cal. Jan. 8, 2020)
26 (finding detention for nearly nine months weighs in favor of the petitioner);
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1 *Belqasim v. Bostock*, No. 2:25-CV-01282-LK-TLF, 2025 U.S. Dist.
2 LEXIS 224772, 2025 WL 3466971, at *9 (W.D. Wash. Oct. 28, 2025),
3 *report and recommendation adopted sub nom. Belqasim v. Hermosillo*,
4 No. 2:25-CV-01282-LK, 2025 U.S. Dist. LEXIS 223710, 2025 WL
5 3170929 (W.D. Wash. Nov. 13, 2025); *Guatam v. Corr. Corp. of Am.*, No.
6 3:25-CV-3600-JES-DEB, 2026 U.S. Dist. LEXIS 994, 2026 WL 25846, at
7 *5 (S.D. Cal. Jan. 5, 2026) (“[A] removal order may not become final until
8 after the appeals Petitioner could file, to both the Board of Immigration
9 Appeals and Ninth Circuit...These appeals can take a long time.”);
10 *Abubakar Abdul-Samed v. Warden of the Golden State Annex Det. Facility*,
11 No. 1:25-CV-00098-SAB-HC, 2025 U.S. Dist. LEXIS 142973, 2025 WL
12 2099343, at *7 (E.D. Cal. July 25, 2025) (“Although the Court recognizes
13 that future events are difficult to predict, the Court nevertheless finds that in
14 the event Petitioner’s applications for relief from removal are denied,
15 Petitioner’s possible administrative appeal and judicial review by the Ninth
16 Circuit will be sufficiently lengthy such that this factor weighs in favor of
17 Petitioner.”)

18 22. Here, the length of future detention is unclear. Petitioner an asylum
19 seeker and petitioned for protection out of fear of persecution in
20 Guatemala. When his application for relief was denied, Petitioner filed a
21 Petition for Review with the Board of Immigration Appeals (BIA) on
22

1 April 22, 2026. According to recent studies, a BIA appeal now takes 216
2 days median—exceeding 6 months before a decision. See Exhibit P
3 ZABDI J. SALAZAR Declaration at ¶ 13.
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5 23. Moreover, in the past year researchers have found that at the BIA,
6 “[r]espondent-favorable categories remained rare, especially favorable
7 merits outcomes, which were absent in Q4 2025 and accounted for only
8 two completions in Q1 2026.” See *Id* at ¶ 17. The reality of the BIA
9 today is that adjudications take longer than they have in the past and
10 render results that are disproportionally against migrant detainees. These
11 trends increase the likelihood that Petitioner will need to appeal his
12 decision to the Ninth Circuit. Such appeals would subject Petitioner to
13 continued detention for months if not years.
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17 24. This factor weighs in Petitioners favor.
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19 **c) Delays in Removal**

20 25. These factors concern delays in the removal proceedings caused by
21 Petitioner or the Respondents. These factors are meant to weigh and
22 protect against delay tactics; good-faith actions to litigate and defend are
23 not considered. See *Lopez v. Garland*, 631 F. Supp. 3d 870, 881 (E.D.
24 Cal. 2022) (“Petitioner is entitled to raise legitimate defenses to removal
25 ... and such challenges to his removal cannot undermine his claim that
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1 detention has become unreasonable.”); *Gonzalez v. Bonnar*, No. 18-CV-
2 05321-JSC, 2019 U.S. Dist. LEXIS 12636, 2019 WL 330906, at *4 (N.D.
3 Cal. Jan. 25, 2019) (“The government cites no authority for the
4 proposition that a petitioner who pursues his available legal remedies
5 must forego any challenge to the reasonableness of his detention in the
6 interim and the Court is unaware of any.”); *Liban M.J. v. Sec’y of Dep’t of*
7 *Homeland Sec.*, 367 F. Supp. 3d 959, 965 (D. Minn. 2019) (“[T]he Court
8 agrees Petitioner has not engaged in dilatory tactics and finds this factor
9 favors granting relief...Petitioner is entitled to raise legitimate defenses to
10 removal, including filing a petition for conditional residence, and such
11 challenges to his removal cannot undermine his claim that detention has
12 become unreasonable.”).

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17 26. The Petitioner was unreasonably detained at a tent near the US-Mexico
18 border for more than half a month (17 days) before he was officially
19 served with a Notice to Appear. This delay pushed back the start of his
20 removal proceedings and prolonged his detention. Moreover, the decision
21 to continue the Individual Hearing for 4 months was decided entirely by
22 the immigration court. Petitioner did not choose to prolong his detention
23 for over 100 days. This delay seems to be attributable solely to the
24 ordinary pace of immigration proceedings and the
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1 Government's administration of cases, nevertheless this does not
2 justify prolonged detention without an individualized bond hearing. See;
3 *Mohammad Amin Dawlatzai v. Mullin*, No. 26-cv-850-BJC-DDL, 2026
4 U.S. Dist. LEXIS 105010 (S.D. Cal. May 12, 2026). It is unclear why a
5 continuance would be granted for nearly half a year later. These delays
6 rest solely on the Respondent and they have not addressed them in their
7 reply.
8

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10 27. Moreover, the minimal delays attributed to Petitioner should not be
11 counted against them. On December 3, 2025, counsel for Petitioner
12 submitted a good-faith Motion to Continue to give Petitioner time to
13 supplement the record with critical evidence for his removal defense trial.
14 See Exhibit N at ¶ 3-6. Respondents granted this motion at the Otay Mesa
15 Immigration Court, recognizing the importance of this evidence to Due
16 Process and the Petitioners overall removal defense claim. See Exhibit O.
17 This delay should not be factored against the Petitioner.
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21 28. However, should this Court agree with the Respondents and count the
22 four-month delay from December 2025 to March 2026 against Petitioner,
23 the overall detention would still be unreasonable because Petitioner
24 would have been detained for over 12 months without a bond hearing
25 disregarding the time lost due to the Motion to Continue.
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1 29. Courts have routinely found that 12 months of detention without a bond
2 hearing is unconstitutional and delays attributable solely to the ordinary
3 pace of immigration proceedings and the Government's administration of
4 the case do not justify prolonged detention without an individualized
5 bond hearing. See; *Mohammad Amin Dawlatzai v. Mullin*, No. 26-cv-
6 850-BJC-DDL, 2026 U.S. Dist. LEXIS 105010 (S.D. Cal. May 12,
7 2026). Regardless, the delays created by the respondents made petitioners
8 detention unconstitutionally prolonged.
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10 30. This factor slightly favors Petitioner because the delays mentioned by
11 Respondent were good faith efforts to defend against his removal.
12 Petitioners' continuance request was not a dilatory tactic to make him
13 eligible for a habeas prolonged detention claim. Respondent agrees, as
14 evidenced by their motion grant on December 5, 2025. See Exhibit O.
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18 **V. Immediate Release should be ordered**
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20 31. Petitioner has alleged that his detention has become unconstitutionally
21 prolonged and has provided an analysis of the *Banda* factors to justify his
22 position. Moreover, Petitioner argues that immediate release is proper
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1 because a bond hearing with the immigration court would be futile.³ As
2 the record shows, Petitioner has already requested a bond hearing on two
3 different occasions March 10 and July 3, 2025, and was categorically
4 denied without an analysis of flight risk or danger to the community.
5 Requiring petitioner to do another bond hearing does not promote judicial
6 economy and unnecessarily prolongs the detention of Petitioner, who
7 desperately needs medical attention. To remedy any concerns over flight
8 risk or danger, Respondents are welcome to used alternatives to detention
9 in this situation like an ankle monitor or watch.
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13 **VI. The burden of proof belongs to the government**

14 32. Many Courts have held that the government must justify the continued
15 confinement of a non-citizen detainee under § 1226 (c) by clear and
16 convincing evidence that the non-citizen is a flight risk or a danger to the
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21 ³ Over the past several months, Immigration Judges throughout the country have been denying
22 bonds at habeas-mandated bond hearings based on “flight risk” at concerning rates. *See Said v.*
23 *Noem*, No. 3:25-cv-938-MOC, 2026 LX 47279 (W.D.N.C. Feb. 4, 2026); *Picado v. Hyde*, No.
24 26-cv-065-JJM-PAS, 2026 LX 18501 (D.R.I. Feb. 9, 2026); *W.T.M. v. Bondi*, No. 2:25-cv-
25 02428-RAJ-BAT, 2026 LX 50958, (W.D.Wash. Jan. 30, 2026).
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community.⁴ Petitioner has been subjected to unconstitutionally prolonged detention without a bond hearing for over 17 months. Placing the burden of proof on the Petitioner, would not remedy the constitutional violation that has occurred and would not comport with precedent set in other cases in this District.

PRAYER FOR RELIEF

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

⁴ See *Zarei v. Larose*, No. 26-CV-2932 JAO (AHG), 2026 U.S. Dist. LEXIS 111081 (S.D. Cal. May 19, 2026), *Derbew v. LaRose*, No. 26-CV-2803 JAO (DEB), 2026 U.S. Dist. LEXIS 115934 (S.D. Cal. May 22, 2026), *Pacheco v. Warden of the Cal. Det. Facility*, No. 1:26-cv-1047 DJC CSK, 2026 U.S. Dist. LEXIS 86595 (E.D. Cal. Apr. 17, 2026); *Sanchez-Rivera*, 2023 U.S. Dist. LEXIS 3858, 2023 WL 139801, at *7 n.5 (citing *Singh v. Holder*, 638 F.3d 1196, 1200 (9th Cir. 2011)); see also *Martinez v. Clark*, 124 F.4th 775, 785 (9th Cir. 2024). Compare with *Cruz-Munoz v. Warden, Cal. City Det. Facility*, No. 1:26-cv-1619 TLN CSK, 2026 U.S. Dist. LEXIS 67986 (E.D. Cal. Mar. 30, 2026) (Petitioner in this case was detained under 1226© but before filing his habeas, he was granted a bond hearing where the judge weighed danger and flight risk. In our case, no such bond hearing was conducted. Petitioner has been denied bond twice, based on lack of jurisdiction.)

1. Assume jurisdiction over this matter;
2. Enjoin Respondents from transferring Petitioner outside the jurisdiction of
the U.S. District Court for the Southern District of California pending the
resolution of this case;
3. Issue a Writ of Habeas Corpus;
4. Order Respondents to immediately release Petitioner from immigration
detention;
5. Alternatively, conduct *an immediate bond hearing where DHS bears the
burden of justifying Petitioner's continued detention by clear and convincing
evidence*. If a bond hearing is not scheduled within the Courts ordered
deadline, we request immediate release;
6. Award reasonable attorney's fees and costs pursuant to the Equal Access to
Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412
7. Grant such further relief as the Court deems just and proper.

Dated: June 28, 2026

Respectfully submitted,

By: s/ Nicholas Paul

Pro-bono Attorney for Petitioner

Email: nick@panasd.org