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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

Jacinto ACEVEDO ROJAS,

Petitioner,

v.

CHRISTOPHER J. LAROSE, Senior Warden, Otay Mesa Detention Center, San Diego, California; GREGORY J. ARCHAMBEAULT, Field Office Director, San Diego Office of Detention and Removal, U.S. Immigrations and Customs Enforcement; U.S. Department of Homeland Security; DAVID J. VENTURELLA, Acting Director, Immigration and Customs Enforcement, U.S. Department of Homeland Security; MARKWAYNE MULLIN, Secretary, U.S. Department of Homeland Security; TODD BLANCHE, Attorney General of the United States;

Respondents.

CIVIL CASE NO.: '26CV4153 DMS DEB

AGENCY NO. 216-266-122

PETITION FOR WRIT OF HABEAS CORPUS; COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF

INTRODUCTION

1. Petitioner Jacinto Acevedo-Rojas seeks a writ of habeas corpus pursuant to 28 U.S.C. § 2241 challenging his continued detention by U.S. Immigration and Customs Enforcement ("ICE").

2. Petitioner is presently detained at the Otay Mesa Detention Center in San Diego County, California. He was taken into ICE custody on or about July 7, 2026.

3. Petitioner is a 43-year old native and citizen of Mexico who has lived in the United States for approximately 27 years. Mr. Acevedo Rojas first entered the United States in May 1999 and has resided in the United States continuously since January 2011, following a brief period of removal in November 20 I 0. He has spent the vast majority of his adult life in the United States, building his livelihood and his family here.

4. Petitioner has no criminal convictions and poses no threat to public safety or national security. Rather than evade immigration authorities, he has consistently pursued relief through lawful channels. He sought Cancellation of Removal before the Immigration Court, pursued appellate review after the denial of relief, and sought judicial review before the United States Court of Appeals for the Ninth Circuit. On April 16, 2026, the Ninth Circuit denied his petition for review, leaving his removal order in place.

5. Before his detention, Petitioner had been pursuing humanitarian immigration relief as a survivor of human trafficking. On July 6, 2026, prior counsel prepared and filed a T-nonimmigrant visa petition that is now pending before United States Citizenship and Immigration Services ("USCIS").

6. Petitioner is therefore a survivor pursuing victim-based immigration relief and a member of the nationwide class protected under *Immigr. Ctr. for Women & Child. v. Noem*, No. 2:25-CV-09848-AB-AS (C.D. Cal. May 20, 2026)(hereinafter "*ICWC*"), which restored longstanding ICE policies requiring a victim-centered approach toward T-visa petitioners and other survivors of crime.

7. Under the reinstated 2021 Directive, ICE officers must consider pending T-visa petitions and victim status as positive discretionary factors in custody decisions and generally refrain from enforcement actions against known beneficiaries or applicants for victim-based immigration relief absent exceptional circumstances.[1]

8. No exceptional circumstances exist here.

9. Nevertheless, Respondents continue to detain Petitioner despite his pending T-visa petition, lack of criminal history, lengthy residence in the United States, and status as a trafficking survivor.

[1] *See* U.S. Immigr. & Customs Enf't, ICE Directive 11005.3, Using a Victim-Centered Approach with Noncitizen Crime Victims (Dec. 2, 2021), https://www.ice.gov/doclib/foia/policy/11005.3_UsingVictimCenteredApproachNoncit izenVictims.pdf [https://perma.cc/TE6H-GVRT].

10. Petitioner's continued detention violates the district court's preliminary injunction in *ICWC v. Noem,* violates agency policy, and constitutes unlawful custody warranting habeas relief.

PARTIES

11. Petitioner Jacinto Acevedo-Rojas is a citizen of Mexico and is presently detained at the Otay Mesa Detention Center.

12. Respondent Christopher J. LaRose is the Senior Warden of Otay Mesa. He is employed by CoreCivic, a private, for-profit corporation that owns and manages private prisons and detention centers. Respondent LaRose is the immediate physical custodian of Petitioner. He is sued in his official capacity.

13. Respondent Gregory J. Archambeault is the San Diego ICE Field Office Director. In this capacity, he has responsibility for and authority over the detention and removal of noncitizens housed at Otay Mesa; is authorized to release Petitioner; and is a legal and immediate custodian of Petitioner. He has supervisory authority over ICE detention and deportation officers assigned to Otay Mesa. He is sued in his official capacity.

14. Respondent David J. Venturella is the Acting Director of U.S. Immigration and Customs Enforcement. As the highest-ranking officer for ICE, he has authority over all of the policies challenged in this action. He is sued in his official capacity.

15. Respondent Markwayne Mullin is the Secretary of the U.S. Department of Homeland Security ("DHS"), and is sued in his official capacity. The Secretary of Homeland Security is charged with the administration and enforcement of immigration laws. 8 U.S.C. § 1103(a).

16. Respondent Todd Blanche is the Attorney General of the United States and is sued in his official capacity as the head of the Department of Justice. The Attorney General is responsible for the fair administration of the laws of the United States.

JURISDICTION AND VENUE

17. This Court has jurisdiction under 28 U.S.C. § 2241 (federal habeas statute); 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 2201-2 (declaratory judgment); United States Constitution Article I, Section 9 (Suspension Clause).

18. Petitioner is currently detained in the custody of Respondents at the Otay Mesa Detention Facility in San Diego, California. Venue lies in the United States District Court for the Southern District of California, the judicial district in which Petitioner is currently in custody. Venue is proper in the Southern District of California under 28 U.S.C.A. § 1391, as venue is proper in any district in which a defendant resides, and a substantial part of the events giving rise to Petitioner's claims occurred in this District.

EXHAUSTION OF REMEDIES

19. Habeas claims are generally accompanied by a prudential exhaustion requirement. *Hernandez v. Sessions*, 872 F.3d 976, 988(9th Cir. 2017)("The exhaustion requirement is prudential, rather than jurisdictional, for habeas claims").

20. "[A] court may waive the prudential exhaustion requirement if 'administrative remedies are inadequate or not efficacious, pursuit of administrative remedies would be a futile gesture, irreparable injury will result, or the administrative proceedings would be void.'" *Hernandez v. Sessions*, 872 F.3d 976, 988 (9th Cir. 2017) (quoting *Laing v. Ashcroft*, 370 F.3d 994, 1000 (9th Cir. 2004)).

21. Here, administrative remedies are inadequate to address the injuries at issue. Mr. Acevedo Rojas does not merely challenge a discretionary custody determination; rather, he challenges his continued detention while his T-nonimmigrant visa application remains pending before USCIS and while he seeks protection as a survivor of severe human trafficking. Neither the Immigration Judge nor the Board of Immigration Appeals can provide the full relief sought here, which includes immediate release from unlawful detention and protection against governmental interference with the adjudication of his pending T-visa petition.

22. Moreover, Mr. Acevedo Rojas is a member of the Pending Petition Class and Stay of Removal Class certified in *ICWC v. Noem* Civ. No. 2:25-CV-09848-AB-AS (C.D. Cal. May 20, 2026). The district court in that matter preliminarily determined that individuals with pending T-visa petitions possess

significant interests in being free from detention and removal practices that interfere with the adjudication of their petitions, restored prior victim-centered guidance, and certified classes encompassing individuals in Mr. Acevedo Rojas's position. As such, prompt judicial review where a trafficking survivor with a pending T-visa petition is detained despite the absence of any public safety concerns or meaningful risk of flight, is required to prevent further irreparable harm to Petitioner.

23. Therefore, a writ of habeas corpus is the sole avenue to vindicate Mr. Rojas Acevedo's constitutional, statutory, and regulatory rights and restore his liberty.

STATEMENT OF FACTS

24. Petitioner is a 43-year old native and citizen of Mexico, who last entered the United States in 2011.

25. Mr. Acevedo Rojas is the father of A[redacted], a nine-year-old United States citizen born on [redacted] in Oceanside, California, who live with him and depends entirely on his father for daily care, financial support, and stability.

26. Petitioner has no criminal convictions, no DUI history, and criminal affiliations.

27. Petitioner is a survivor of human trafficking and pursued eligibility for T nonimmigrant status through prior counsel.

28. Petitioner previously appeared for immigration proceedings and pursued available legal remedies regarding his immigration case.

29. A final order of removal was issued in approximately 2019. Prior counsel pursued appellate review through the Ninth Circuit. The appeal process concluded in 2026.

30. On or about July 7, 2026, ICE detained Petitioner and transferred him to the Otay Mesa Detention Center.

31. ICE detained Petitioner despite the pending T-visa petition and despite the absence of any criminal or public-safety concerns.

32. ICE failed to meaningfully consider Petitioner's victim status, the pending T-visa petition, and the humanitarian concerns underlying that application.

33. ICE has continued Petitioner's detention notwithstanding the lack of any evidence that he poses a danger to the community or a national-security threat.

LEGAL FRAMEWORK

34. In 1994, Congress passed the Violence against Women Act ("VAWA") to break the cycle of noncitizens remaining in relationships with abusers who held the keys to their eligibility for lawful immigration status in the United States. *See* Violent Crime Control and Law Enforcement Act of 1994, Title IV, Pub. L. 103-322, 108 Stat. 1796 (September 13, 1994). "[T]he goal of the bill is to 'permit[ ] battered immigrant women to leave their batterers without fearing

deportation.'" *Hernandez v. Ashcroft*, 345 F.3d 824, 841 (9th Cir. 2003) (quoting H.R. Rep. No. 103–395, at 25).

35. Victims of Trafficking and Violence Protection Act of 2000 ("VTVPA"), which included the Trafficking Victims Protection Act of 2000. ("TVPA")

36. Through the TVPA, Congress created the T visa, which provides an avenue to lawful permanent residence and U.S. citizenship for survivors of a "severe form of trafficking in persons," as well as their family members. Pub L. No. 106-386, 114 Stat. 1464, 1475; 8 U.S.C. §§ 1101(a)(15)(T), 1255(1). "Severe form of trafficking in persons" means either sex trafficking or labor trafficking involving the use of "force, fraud, or coercion." 8 C.F.R. § 214.201.

37. In passing the TVPA, Congress made several express findings. It found that "trafficking in persons. . .is the largest manifestation of slavery today" and that "[a]pproximately 50,000 women and children are trafficked into the United States each year." 22 U.S.C. § 7101(b)(1). "Victims are often forced through physical violence to engage in sex acts or perform slavery-like labor." 22 U.S.C. § 7101(b)(6). Because "[e]xisting laws often fail to protect victims of trafficking, and because victims are often illegal immigrants in the destination country, they are repeatedly punished more harshly than the traffickers themselves." 22 U.S.C. § 7101(b)(17). "Victims of severe forms of trafficking should not be inappropriately incarcerated, fined, or otherwise penalized solely for unlawful acts committed as a

direct result of being trafficked." 22 U.S.C. § 7101(b)(19). The TVPA was passed to remedy these ills.

38. As the Immigration and Naturalization Service ("INS") acknowledged, "Congress's intentions in passing the TVPA were to further the humanitarian interests of the United States and to strengthen the ability of government officials to investigate and prosecute trafficking in persons crimes by providing temporary immigration benefits to victims." *New Classification for Victims of Severe Forms of Trafficking in Persons; Eligibility for "T" Nonimmigrant Status*, 67 Fed. Reg. 4784-01 (Jan. 31, 2002). As highlighted in the USCIS Policy Manual ("PM"), USCIS maintains this interpretation, stating the TVPA "was enacted to strengthen the ability of law enforcement agencies to investigate and prosecute trafficking in persons, while offering protections to victims of such trafficking, including temporary protections from removal, access to certain federal and state public benefits and services, and the ability to apply for T nonimmigrant status." PM vol. 3, pt B, ch. 1.A.

39. Congress capped the number of T visas for principal applicants that can be granted each year to 5,000. 8 U.S.C. § 1184(o)(2)-(3). The number of applicants has grown over the years. As a result, USCIS created processes for bona fide determinations and placement on a waiting list to protect T visa petitioners from removal if the annual cap is reached. 89 Fed. Reg. 34864 (Apr. 30, 2024); 8 C.F.R. §§ 214.205, 214.210.

40. Additionally, Congress authorized broad waivers of inadmissibility to protect eligible petitioners from removal. TVPA § 107(e)(3).

41. In 2008, Congress passed the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 ("TVPRA"). Pub. L. No. 110-457, 122 Stat. 5044. The TVPRA added § 237(d) to the Immigration and Nationality Act ("INA"), which authorizes DHS to issue a stay of any removal order against a U or T visa petitioner if the petition "sets forth a prima facie case for approval." 8 U.S.C. § 1227(d)(1). Any such stay remains in effect until the a T visa is approved or denied, during which time the applicant "shall not be removed." 8 U.S.C. §§ 1227(d)(1)-(3).

42. Consistent with Congress's intent to encourage noncitizen victims to report trafficking, for nearly two decades, DHS policies have generally required ICE to refrain from pursuing removal efforts against people with pending T visa petitions, like petitioner, absent serious public safety concerns.[2] These include the

[2] *See* Memorandum from William J. Howard, Principal Legal Advisor, to All OPLA Chief Counsel, *Prosecutorial Discretion* (Oct. 24, 2005), available at https://www.aila.org/library/ice-prosecutorial-discretion-memo; Memorandum from William Howard, Principal Legal Advisor, to All OPLA Chief Counsel, *VAWA 2005 Amendments to the Immigration and Nationality Act and 8 U.S.C. § 1367* (Feb. 1, 2007), available at https://www.ice.gov/doclib/foia/policy/memoVAWA_2005_INA_Amendments_02.01.2007.pdf; Memorandum of David J. Venturella, Acting Director, Detention and Removal Operations, to Field Office Directors, *Guidance: Adjudicating Stay Requests Filed by U Nonimmigrant Status (U-visa) Applicants*, (Sept. 24, 2009), available at https://www.ice.gov/doclib/foia/dro_policy_memos/11005_1-hd-stay_requests_filed_by_u_visa_applicants.pdf; Memorandum from Peter S. Vincent, Principal Legal Advisor, to OPLA Attorneys, *Guidance Regarding U Nonimmigrant Status (U visa) Applicants in Removal Proceedings or with Final Orders of Deportation or Removal* (Sept. 25, 2009), available at https://www.ice.gov/doclib/foia/dro_policy_memos/vincent_memo.pdf; ICE

written policies issued in 2011 and 2021 policies. *See* John Morton, ICE Policy Statement 10076.1, *Prosecutorial Discretion: Certain Victims, Witnesses, and Plaintiffs* (Jun. 17, 2011) ("2011 Policy"), available at https://www.ice.gov/doclib/foia/prosecutorial-discretion/certain-victims-witnesses-plaintiffs.pdf (last checked Jul. 20, 2026) and ICE Directive 11005.3, *Using a Victim-Centered Approach with Noncitizen Crime Victims* (Dec. 2, 2021) ("2021 Policy" or "2021 Directive"), available at https://www.ice.gov/doclib/foia/policy/11005.3_UsingVictimCenteredApproachNoncitizenVictims.pdf (last checked Jul. 20, 2026).

43. As with prior DHS policy, the 2011 Policy reiterated that "[a]bsent special circumstances or aggravating factors," it is generally "against ICE policy to initiate removal proceedings against" known victims of crime. 2011 Policy at 1. Notably, the 2011 Policy also explains "that a flag now exists in" DHS systems "to identify those victims of domestic violence, trafficking, or other crimes who already have filed for . . .victim-based immigration relief." 2011 Policy at 3.

44. The 2021 Directive continued ICE's longstanding policy to "refrain from taking civil enforcement action against" individuals "known to have a pending

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Directive 11005.2, *Stay of Removal Requests and Removal Proceedings Involving U Nonimmigrant Status (U Visa) Petitioners*, (Aug. 2, 2019), available at https://www.ice.gov/doclib/foia/policy/11005.2_StayRemovalReqRemProcUVisaPetitioners.pdf.

application" for "victim-based immigration benefits," "absent exceptional circumstances" such as national security or public safety concerns. 2021 Directive at 1-2, 9. If such an application was pending, ICE was to "defer" enforcement until USCIS adjudicates the petition or issues a negative interim adjudication. *Id.* at 2. Agents were to request expedited prima facie adjudications from USCIS for people in ICE custody, and eligibility "for victim-based immigration benefits . . . must be considered" a "positive discretionary factor." *Id.* at 2, 9.

45. In January 2025, Respondent ICE issued a policy that, for the first time in the agency's history, authorized the routine detention and removal of noncitizen victims of crime, like Petitioner. *See* ICE Policy Number 11005.4, *Interim Guidance on Civil Immigration Enforcement Actions Involving Current or Potential Beneficiaries of Victim-Based Immigration Benefits* (Jan. 30, 2025) ("2025 Guidance"), available at https://www.ice.gov/doclib/foia/policy/11005.4.pdf (last visited Jul. 20, 2026).

46. The 2025 Guidance marked an abrupt about-face from longstanding DHS practices, under which immigration agencies generally refrained from enforcement against noncitizen crime victims absent serious adverse factors.

47. On October 14, 2025, several individual plaintiffs and non-profit legal organizations serving immigrant survivors filed a class action complaint in *ICWC*, challenging the lawfulness of the 2025 Guidance and, as relevant here, the De Facto

Revocation Policy. *See* Compl. ¶¶ 200-233 *Immigr. Ctr. for Women & Child. v. Noem, et al.*, No. 2:25-cv-09848-AB-AS (C.D. Cal. Oct. 14, 2025) [Dkt. 1].

48. On May 20, 2026, the U.S. District Court for the Central District of California granted *ICWC* Plaintiffs' Motion for Class Certification and granted in part *ICWC* Plaintiffs' Motion for APA § 705 Relief and Individual and Classwide Preliminary Injunction. *ICWC* PI Order.

49. Petitioner falls squarely within the Pending Petition Class recognized by the *ICWC* court because he has a pending T-visa petition and is currently detained by ICE for civil immigration enforcement purposes. *See ICWC v. Noem* Civ. No. 2:25-CV-09848-AB-AS (C.D. Cal. May 20, 2026).

50. Absent release, Petitioner will continue to suffer severe and irreparable harms arising from his detention. Mr. Acevedo Rojas remains separated from his nine-year-old United States citizen son, A[redacted] for whom he serves as the primary caregiver, source of emotional support, and sole financial provider. His continued incarceration prevents him from caring for his son's ongoing educational, medical, and daily needs and deprives his family of its principal means of financial support. Petitioner also remains unable to assist his partner, who suffers from diabetes and relies upon him for transportation and healthcare-related support. Continued detention further exacerbates the significant psychological trauma Petitioner suffers as a result of the trafficking he endured, including recurring panic attacks and emotional distress associated with his trafficking experience.

Additionally, each day of detention interferes with Petitioner's ability to meaningfully pursue and support his pending Form I-914 Application for T Nonimmigrant Status before USCIS. The loss of liberty, family separation, economic hardship, deterioration of mental health, and impairment of Petitioner's ability to seek congressionally authorized humanitarian protection constitute ongoing and irreparable injuries that cannot be adequately remedied by monetary damages or other relief after the fact.

CLAIMS FOR RELIEF

COUNT ONE

Violation of the Administrative Procedure Act: Petitioner's Detention is Not in Accordance with Law because It Violates the ICWC PI Order

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

52. Under the APA, courts "shall . . . hold unlawful and set aside agency action . . .found to be . . .not in accordance with law." 5 U.S.C. § 706(2)(A).

53. ICE is required to follow the reinstated 2021 Directive and 2011 Policy recognized and restored by the *ICWC* order. *See ICWC*, 2026 WL 1455004, at *96.

54. Respondents failed to give meaningful consideration to Petitioner's status as a trafficking survivor and pending T-visa petitioner.

55. Respondents further failed to treat Petitioner's victim status and pending petition as positive discretionary factors as required by the 2021 Directive.

56. Because no exceptional circumstances exist, Petitioner's continued detention is contrary to binding agency policy and therefore not in accordance with law.

COUNT TWO

Violation of the Accardi Doctrine: Petitioner's Detention Violates the PM, Regulations, and Longstanding Policy and Practice

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

58. The Supreme Court has long recognized that government agencies are required to follow their own procedures. *See United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 268 (1954). Courts have regularly applied this principle to the immigration agencies. *See, e.g., Alcaraz v. INS*, 384 F.3d 1150, 1162 (9th Cir. 2004). The *Accardi* doctrine extends beyond formal "regulations" to include, e.g., "internal operating procedures," "handbook[s]," "policy statements," and other materials that document an agency's "usual practice." *Id.* at 1162.

59. The 2021 Directive and 2011 Policy are binding agency guidance governing ICE's treatment of trafficking survivors and T-visa applicants. *See ICWC*, 2026 WL 1455004, at *96.

60. Those policies require consideration of victim status and generally prohibit civil immigration enforcement actions against known applicants for victim-based relief absent exceptional circumstances.

61. Respondents have disregarded those requirements.

62. Respondents' failure to comply with their own governing policies violates the Accardi doctrine and renders Petitioner's detention unlawful.

COUNT THREE

Detention Contrary to the Victim-Centered Protections Recognized in ICWC v. Noem

63. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

64. The district court in *ICWC v. Noem* restored the victim-centered framework that had protected T-visa petitioners for years.

65. Petitioner is a member of the Pending Petition Class identified by the court. On July 6, 2026, Petitioner mailed his T-Visa petition to USCIS.

66. Petitioner is a member of the Stay of Removal Class identified by the court. On July 7, 2026, Petition submitted his Stay of Removal with ICE.

67. By detaining Petitioner without the exceptional circumstances required by the reinstated policies, Respondents are acting inconsistently with the protections recognized in ICWC and with the court's order.

68. Habeas relief is necessary to enforce Petitioner's rights and to prevent ongoing unlawful detention.

COUNT FOUR

Fifth Amendment: Violation of Due Process

69. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

70. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

71. Because "[a]rbitrary civil detention is not a feature of our American government," *Rodriguez v. Marin*, 909 F.3d 252, 256 (9th Cir. 2018), civil confinement is only permissible "in certain special and narrow non-punitive circumstances," where a "special justification" asserted by the government "outweighs the individual's constitutionally protected interest in avoiding physical restraint." *Zadvydas*, 533 U.S. at 690 (cleaned up).

72. Petitioner has a fundamental interest in liberty and being free from official restraint.

73. The government's detention of Petitioner violates his rights to due process because he has been detained without lawful authority, infringing on his fundamental right to liberty.

74. Petitioner acknowledges that a final order of removal exists and does not seek vacatur of that order itself before this Court in this matter. Rather, Petitioner challenges Respondents' ongoing detention and the threat of removal while his Form I-914 Application for T Nonimmigrant Status remains pending before USCIS. Petitioner further challenges Respondents' actions insofar as they interfere with his ability to pursue congressionally authorized humanitarian relief as a survivor of severe human trafficking.

75. The continued detention of a trafficking survivor with a pending T-visa petition, absent any public-safety rationale and contrary to governing policies, is arbitrary and violates due process.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully prays the Court to:

1) Assume jurisdiction over this matter;
2) Order that Petitioner shall not be transferred outside the Southern District of California while this habeas petition is pending;
3) Issue a Writ of Habeas Corpus requiring that Respondents immediately release Petitioner;

4) Award Petitioner his costs and reasonable attorneys' fees in this action as provided for by the Equal Access to Justice Act, 28 U.S.C. § 2412, other statute; and

5) Grant any other and further relief this Court deems just and proper.

DATED this 20th of July, 2026

By: /s/ Priscilla Merida

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28 U.S.C. § 2242 VERIFICATION STATEMENT

I am submitting this verification on behalf of the petitioner because I am the Petitioner's attorney. I have discussed with the Petitioner the events described in this Petition and Complaint. On the basis of those discussions, I hereby verify that the statements made in this Petition and Complaint are true and correct to the best of my knowledge.

Dated this 20th of July, 2026

By: /s/ Priscilla Merida

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