

1 Bardis Vakili, CA SBN 247783  
2 bardis@vakililegal.com  
3 Law Office of Bardis Vakili, P.C.  
4 P.O. Box 234160  
5 Encinitas, CA 92023  
6 Tel: (619) 483-3490

7  
8  
9  
10 *Attorney for Plaintiff John M. Manley*

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

John M. Manley,

Plaintiff,

v.

U.S. Customs and Border Protection,  
Defendant.

) Case No.: 24-1427

) **COMPLAINT [FREEDOM OF  
INFORMATION ACT]**

## INTRODUCTION

1  
2 1. This is an action under the Freedom of Information Act (“FOIA”), 5  
3 U.S.C. § 552, for declaratory, injunctive, and other appropriate relief, seeking  
4 transparency regarding the administration by United States Customs and Border  
5 Protection (“CBP”) of a civil enforcement system for alleged violations of Trusted  
6 Traveler programs by motorists and their passengers at the land borders of the  
7 United States.

8 2. Many people approaching the United States border by car find the  
9 process extremely complicated and can easily make mistakes. Plaintiff John Manley  
10 is a prominent Los Angeles-based immigration attorney who regularly represents  
11 individuals impacted by CBP’s enforcement of its Trusted Traveler programs,  
12 including people facing exorbitant CBP fines for inadvertently getting stuck in the  
13 northbound “SENTRI” lanes (lanes reserved for members of certain Trusted  
14 Traveler programs) from Mexico to the United States border. Mr. Manley has  
15 become an outspoken advocate regarding CBP’s SENTRI lane enforcement at land  
16 ports of entry, seeking to educate the public about their existence so that such fines  
17 may be avoided.

18 3. The policies, procedures, adjudicative structure, and legal authority for  
19 CBP’s financial penalty system for alleged SENTRI lane violations are not well  
20 understood by the public, travelers, or the immigration bar. In addition, it is not  
21 widely publicized how much financial benefit CBP gains from its enforcement  
22 efforts or what notice CBP provides to travelers so that they may avoid exorbitant  
23 fines. Furthermore, whether CBP’s policies and practices differ at the northern and  
24 southern border warrants public scrutiny.

25 4. Opaque adjudicative systems such as CBP’s financial penalty system  
26 for SENTRI lane violations invite arbitrary enforcement, to the detriment of the  
27 public generally and cross-border travelers specifically. Thus, to seek transparency  
28 and meaningful information, Plaintiff submitted, through counsel, a FOIA request

1 to CBP on September 25, 2023, seeking records related to CBP’s enforcement  
2 practices regarding alleged SENTRI lane violations.

3 5. To date, and long past the statutory deadline to respond, CBP has  
4 provided no response. Meanwhile, Plaintiff continues to encounter members of the  
5 public against whom hefty fines are being extracted under CBP’s punitive SENTRI  
6 enforcement system based on mistake or lack of awareness regarding SENTRI lane  
7 restrictions. To help the public better understand this system and to probe its  
8 lawfulness, Mr. Manley seeks an order requiring CBP to immediately search for and  
9 disclose records pursuant to Mr. Manley’s FOIA request.

### 10 JURISDICTION AND VENUE

11 6. This Court has subject matter jurisdiction over the FOIA claim and  
12 personal jurisdiction over the parties pursuant to 5 U.S.C. § 552(a)(4)(B). This  
13 Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C.  
14 § 1331 and 5 U.S.C. §§ 701–706.

15 7. Venue is proper in this district under 5 U.S.C. § 552(a)(4)(B) and 28  
16 U.S.C. § 1391(e) because Plaintiff resides and has his principal place of business in  
17 Los Angeles, California.

18 8. Because Defendant CBP failed to respond to Plaintiff’s FOIA Request  
19 in the time required by statute, *see* 5 U.S.C. § 552(a)(6)(A)(i), Plaintiff has  
20 constructively exhausted all administrative remedies and is entitled to file suit with  
21 this Court to enforce compliance with FOIA. *See* 5 U.S.C. §§ 552(a)(4)(B) &  
22 (a)(6)(C)(i).

### 23 PARTIES

24 9. Plaintiff John M. Manley is an immigration lawyer who resides and  
25 maintains his principal office in Los Angeles, California. He currently serves on the  
26 Executive Committee of the Southern California chapter of the American  
27 Immigration Lawyers’ Association (“AILA”). He also serves on the AILA National  
28 Media and Advocacy committee as its Vice Chair, and he is a past Chair of the

1 Immigration Section of the Los Angeles County Bar Association. Mr. Manley  
2 maintains a blog for purposes of informing the public about pertinent immigration  
3 issues, and he has written extensively about CBP’s operation of a financial penalty  
4 system for enforcing Trusted Traveler programs at the southern border of the United  
5 States.

6 10. Defendant CBP is a component of the U.S. Department of Homeland  
7 Security and an “agency” within the meaning of 5 U.S.C. §§ 551, 552(f)(1), and  
8 702. It is headquartered in Washington, D.C. and has field offices throughout the  
9 country. Among other things, CBP operates at ports of entry to the United States  
10 through its Office of Field Operations, and it implements Trusted Traveler  
11 programs, including its civil penalty system for alleged violations of those  
12 program’s requirements. On information and belief, CBP has possession, custody,  
13 and control of the records sought by Plaintiff.

## 14 **FACTUAL ALLEGATIONS**

### 15 **I. Trusted Traveler Programs**

16 11. The U.S. Department of Homeland Security operates Trusted Traveler  
17 programs, which allow travelers to utilize expedited lanes in U.S. airports and when  
18 crossing international borders, including the land borders of the United States.  
19 Applicants may be granted membership into one of these programs by applying,  
20 paying a fee, and passing appropriate background checks.

21 12. The Secure Electronic Network for Travelers Rapid Inspection  
22 (“SENTRI”) program is a Trusted Traveler program operated by CBP that “allows  
23 expedited clearance for pre-approved, low-risk travelers upon arrival in the United  
24 States,” including by permitting travelers to “enter the United States by using  
25 dedicated primary lanes into the United States at [s]outhern land border ports.”<sup>1</sup>  
26 SENTRI pass holders also receive expedited processing at ports of entry along the

27  
28 <sup>1</sup> CBP, “Secure Electronic Network for Travelers Rapid Inspection,”  
<https://www.cbp.gov/travel/trusted-traveler-programs/sentri>.

1 northern border of the United States and through Transportation and Security  
2 Administration Pre-Check lanes in United States airports.

3 13. NEXUS is a program operated by CBP which provides many of the  
4 same benefits as SENTRI, but which only operates along the United States border  
5 with Canada.

6 14. Global Entry is another Trusted Traveler program. As relevant for this  
7 case, Global Entry members may utilize the same expedited processing lanes at land  
8 ports of entry that SENTRI and NEXUS program members may utilize.

9 **II. Vehicle entry to the United States from the southern border between**  
10 **California and Mexico**

11 15. Along California's southern border, there are at least four ports of entry  
12 through which motorists may lawfully enter the United States: San Ysidro, Otay  
13 Mesa, Calexico, and Tecate. The San Ysidro and Otay Mesa ports of entry connect  
14 between Tijuana, Mexico and San Ysidro, California, about twenty miles south of  
15 the city of San Diego, California. The Tecate port of entry connects between Tecate,  
16 Mexico and the eastern part of San Diego County. The Calexico ports of entry  
17 (which contain an East and West section) connect between Mexicali, Mexico and  
18 Calexico, California. The San Ysidro port of entry is the largest of these: it has been  
19 described as the fourth busiest land border crossing in the world and the busiest in  
20 the western hemisphere.

21 16. Tens of thousands of motorists transit through these crossings every  
22 day. Many are part of the region's robust cross-border community: people who live  
23 in one country but who work, attend school, or regularly do business or shop in the  
24 other. However, a great many are unfamiliar with the process of entering the United  
25 States through the southern land ports of entry, including individuals returning to the  
26 United States after a trip abroad for tourism, visiting friends or family, or for myriad  
27 other reasons.

28

1           17. As motorists approach the United States southern border from Mexico,  
2 there are certain traffic lanes dedicated specifically as SENTRI lanes, though the  
3 exact number may vary depending on the day, time, and degree of traffic  
4 congestion. Only vehicles in which all riders are members of an appropriate Trusted  
5 Traveler program may utilize these SENTRI lanes.

6           18. Depending on the day and time, the vehicle wait times at the ports of  
7 entry are often more than an hour – sometimes far more – for people in the general  
8 vehicle lanes. The wait times for SENTRI lanes are often shorter than for the general  
9 traffic lanes, but it is not uncommon for the SENTRI lanes to also have significant  
10 wait times.

11           19. There is some signage extending south from the United States border  
12 that advises motorists which lanes are SENTRI lanes and which are not. However,  
13 the traffic lines waiting to enter the United States regularly extend much further than  
14 the signage, particularly in Tijuana, where the traffic lines can wind through the city  
15 and beyond.

16           20. The directions for arriving at a port of entry from Mexico are  
17 notoriously confusing for many, especially in Tijuana, where roads frequently close  
18 or may be suddenly barricaded with minimal warning as Mexican officials attempt  
19 to direct the flow of traffic as the lines back up. As a result, electronic map or GPS  
20 applications or programs can be an unreliable method for navigating to the ports of  
21 entry from Mexico. They also sometimes send motorists on routes to avoid the  
22 significant traffic which ultimately do not provide access to the ports of entry. In  
23 addition, they frequently send motorists inadvertently into SENTRI lanes. Many  
24 lanes and roads in Mexico approaching the border are also poorly marked.  
25 Consequently, people routinely get lost or make wrong turns on their way while  
26 trying to get into the appropriate traffic lane for the port of entry.

27           21. The traffic lines, particularly in Tijuana, routinely become so  
28 congested that it is extremely difficult to change lanes. If motorists find themselves

1 inappropriately in a SENTI lane, it often becomes necessary to drive aggressively  
2 or unsafely to change to an appropriate lane. Sometimes, motorists in this situation  
3 stop moving forward in the SENTRI lane until they can change lanes, causing the  
4 SENTRI lane to back up with angry motorists. Traffic police in Mexico patrol these  
5 lanes and often issue tickets to individuals who back up the SENTRI lane in this  
6 way or who drive unsafely while trying to leave it. As the lanes get closer to the  
7 port of entry, there are physical barriers and/or medians between the SENTRI lanes  
8 and general lanes, making it physically impossible to change lanes. In addition,  
9 motorists and passengers frequently report initially encountering a CBP agent on  
10 foot before entering the primary inspections kiosk. These agents reportedly do not  
11 provide assistance to people mistakenly in the lane seeking to leave it, typically  
12 directing them to drive forward instead.

13 22. Thus, many individuals who accidentally end up in a SENTRI lane –  
14 whether because they got lost, the lines extended beyond the signage, or simply  
15 misjudged which lane they should be in – have no choice but to arrive at the port of  
16 entry in that lane, even though they are not in a Trusted Traveler program. The  
17 mistake is likely to cost them thousands of dollars.

### 18 **III. CBP’s civil forfeiture policy for alleged SENTRI lane violations**

19 23. When a motorist who is not a member of a Trusted Traveler program  
20 arrives at a port of entry in a SENTRI lane and CBP asserts its alleged authority to  
21 impose a fine, CBP issues to the driver a “Notice of Penalty and Liquidated  
22 Damages Incurred and Demand for Payment.” The notice alleges violations of 19  
23 U.S.C. § 1433, 19 U.S.C. § 1436, and 19 C.F.R. § 123.2, and it demands payment  
24 of a financial penalty – usually \$5,000 for a first violation and \$10,000 for any  
25 subsequent violation, citing 19 U.S.C § 1436. The notice provides that a person  
26 seeking to contest the fine may file a petition for relief directly with CBP within 60  
27 days through CBP’s Fines, Penalties, and Forfeitures Officer, and that the process  
28 includes the right to object if there are extenuating circumstances that led to the

1 alleged violation. If payment is not timely made, the notice warns that the case will  
2 be referred to the United States Department of Justice.

3 24. Sometimes passengers in vehicles who are not in charge of the vehicles  
4 are also cited and fined as described in the preceding paragraph. The notice will  
5 similarly allege that the passenger is in charge of the vehicle.

6 25. Payment is often extracted by CBP that day, though the enforcement  
7 varies: sometimes it is the full \$5,000, sometimes less, sometimes \$0.

8 26. It is not clear that the cited provisions actually provide the legal  
9 authority asserted by CBP. For instance:

10 a. 19 U.S.C. § 1433(b) requires vehicles to arrive only at designated  
11 border crossing points. However, it is not clear that a vehicle that  
12 arrives at a designated port of entry, though mistakenly from the  
13 wrong lane, violates subsection (b).

14 b. 19 U.S.C. § 1433(d) requires the person “in charge of” such a  
15 vehicle to present appropriate documentation to customs officials  
16 “as the Secretary may by regulation prescribe.” However, it is not  
17 clear what paperwork is required by subsection (d), what if any  
18 regulations mandate the production of documents by SENTRI pass  
19 holders or people in SENTRI lanes, or that an inability to produce  
20 proof of membership in a Trusted Traveler program by someone  
21 mistakenly in a SENTRI lane necessarily violates this subsection.  
22 Even if there is a violation by the person in charge of the vehicle, a  
23 passenger not in charge of the vehicle would not appear to be in  
24 violation of this subsection.

25 c. 19 U.S.C. § 1436 authorizes penalties and fines for failure to meet  
26 specific arrival and reporting requirements, cross-referencing  
27 myriad other statutes and regulations. Of the cross-referenced  
28 provisions, the only one that appears relevant to the SENTRI issue



1 is a violation of 19 U.S.C. § 1433, discussed in the preceding sub-  
2 paragraphs.

3 d. 19 C.F.R. § 123.2 authorizes civil penalties against, among other  
4 individuals, people in charge of vehicles who enter a vehicle into  
5 the U.S. anywhere other than a designated port of entry. However,  
6 it does not appear to apply to a vehicle that arrives at a designated  
7 port of entry, albeit inadvertently from an incorrect lane, nor to  
8 passengers who are not in charge of a vehicle.

9 27. CBP also sometimes alleges violation of section 15.8 of the Trusted  
10 Traveler program guidelines. However, these guidelines do not appear to be federal  
11 regulations and therefore cannot fall within 19 U.S.C. §1433(d). In any event, they  
12 obviously cannot apply to non-participants in the program, who have not agreed to  
13 them.

14 28. CBP agents have orally informed people being fined that they have  
15 committed multiple violations, even if the agents have no basis for the assertion.

16 29. CBP agents have detained people who inadvertently arrive at a  
17 SENTRI lane for hours, keeping them in handcuffs and/or shackles.

18 30. Travelers who wish to apply for relief from a SENTRI penalty can file  
19 a Petition for Remission of Forfeiture and Response to Seizure Notice with the CBP  
20 Fines, Penalties, and Forfeitures office. Travelers who are dissatisfied with the  
21 decision on that petition can then file a Supplemental Petition for Remission of  
22 Forfeiture and Response to Seizure Notice pursuant to 19 C.F.R §§171.61-64. This  
23 process appears similar to the process for challenging CBP civil asset forfeitures.

24 31. Plaintiff regularly represents clients who have been served by CBP  
25 with a notice and demand for payment, including by submitting petitions for  
26 remission and supplemental petitions to the CBP Fines, Penalties, and Forfeiture  
27 office. In his experience, the procedures, processes, and rules for the adjudication  
28 of these petitions and supplemental petitions are opaque. For instance, it is not clear

1 what statute authorizes the adjudicative system and/or arrest, who bears the burden  
2 of proof and by what standards, what mental state is required for a violation, what  
3 if any defenses might be available, and what avenues exist for judicial review. In  
4 addition, CBP agents will sometimes lower, mitigate, or forgive the amount of the  
5 fine, but the extent to which such a decision by CBP is discretionary is unclear, as  
6 is whether any articulable factors govern such a decision. There is also little  
7 information regarding how the supplemental petition process works and  
8 adjudications of these appeals can take longer than a year.

9 32. Agencies that arbitrarily interpret statutes or exceed their lawful  
10 authority can cause significant public harm. In this case, the damage is not  
11 theoretical. In addition to the substantial \$5,000 fine, which can be devastating for  
12 individuals of limited means, affected travelers often suffer emotional scars as many  
13 have reported being handcuffed, held in secondary, and treated unprofessionally by  
14 CBP agents. Transparency is required to ensure CBP is applying its SENTRI  
15 enforcement authority lawfully.

16 33. To the extent CBP's SENTRI enforcement practices are lawful, a  
17 better understanding and wide dissemination of the policies and procedures  
18 governing this system will aid the public in avoiding mistaken use of the SENTRI  
19 lane, which will ultimately assist the government in achieving greater compliance  
20 with SENTRI lane requirements. It will also assist immigration attorneys seeking  
21 to assist impacted individuals.

22 34. The volume of cases processed through CBP's opaque SENTRI lane  
23 penalty system raises questions of public concern regarding how much money CBP  
24 collects from its enforcement efforts and whether enough is being done to notify  
25 travelers and prevent violations.

26 35. Furthermore, any differences between the manner of CBP's SENTRI  
27 enforcement at the southern border compared to its NEXUS enforcement at the  
28

1 northern border are important for the public to know, to ensure the rules are not  
2 applied arbitrarily or based on impermissible factors.

3 36. Thus, through his FOIA request, Plaintiff seeks to shine a light on the  
4 process to the benefit of the general public, as well as the government.

### 5 **37.Plaintiff’s FOIA Request and Defendant’s Failure to Respond**

6 38. The Freedom of Information Act, 5 U.S.C. § 552, “focuses on the  
7 citizens’ right to be informed about ‘what their government is up to’” by fostering  
8 the release of “[o]fficial information that sheds light on an agency’s performance of  
9 its statutory duties.” *DOJ v. Reporters Comm. For Freedom of the Press*, 489 U.S.  
10 749, 773 (1989) (citation omitted). “[D]isclosure, not secrecy, is the dominant  
11 objective” of FOIA. *Dep’t of Interior v. Klamath Water Users Protective Ass’n*, 532  
12 U.S. 1, 8 (2001) (internal quotations and citation omitted).

13 39. Any member of the public may make a request under FOIA for records  
14 to an agency of the United States. FOIA requires an agency to timely disclose all  
15 records responsive to a FOIA request that do not fall within one of nine narrowly  
16 construed statutory exemptions. 5 U.S.C. §§ 552(a)(3)(A), 552(b)(1)-(9).

17 40. On September 25, 2023, Plaintiff, through counsel, submitted a FOIA  
18 request via CBP’s online FOIA portal ([www.securerelease.us](http://www.securerelease.us)) seeking, from CBP  
19 headquarters and the local field offices of its Office of Field Operations, records  
20 related to the policies, practices, complaints, and data regarding CBP’s system for  
21 enforcing penalties against alleged SENTRI and NEXUS lane violators.

22 41. Plaintiff specified that responsive records should include:

- 23 (1) All policies and/or formal or informal guidance related to the treatment  
24 of, imposition of penalties (including fines, demands for payment,  
25 and/or demands for and/or impounding of automobiles) against, and/or  
26 custody, release, and inspection of:

- 1 a. drivers of a vehicle who do not have the SENTRI pass or are not  
2 members of the Trusted Traveler program and who presented for  
3 inspection at a port of entry through the SENTRI lane;
- 4 b. passengers of a vehicle who do not have the SENTRI pass or are  
5 not members of the Trusted Traveler program, where the vehicle  
6 presented for inspection at a port of entry through the SENTRI lane;
- 7 (2) Records identifying and/or interpreting the statutory authority for the  
8 imposition of penalties for unauthorized use of SENTRI lanes;
- 9 (3) All policies and/or formal or informal guidance related to any  
10 discretion in enforcement in the imposition of SENTRI lane penalties,  
11 including whether enforcement is through strict liability, graduated  
12 enforcement based on the number of violations (such as “three strikes”  
13 enforcement), or other enforcement mechanism, as well as where and  
14 how such penalties are administered;
- 15 (4) All policies and/or informal guidance followed by San Diego Fines,  
16 Penalties and Forfeiture Officer(s) in responding to or adjudicating  
17 Petitions for Remission of Forfeiture and Response to Seizure Notices,  
18 including standards for denying/approving relief or mitigating  
19 penalties in response to such petitions;
- 20 (5) All policies and/or formal or informal guidance related to the  
21 provision, or lack of provision, of warnings, advisals, and/or notice to  
22 the public regarding penalties for unauthorized use of the SENTRI  
23 lanes, including whether those penalties are to be enforced through  
24 strict liability, graduated enforcement based on the number of  
25 violations (such as “three strikes” enforcement), or other enforcement  
26 mechanism, as well as any advisals themselves and the location and  
27 manner that any warnings, advisals, and/or notice are provided;
- 28

1 (6) Statistics reflecting the total number of fines and/or demands for  
2 payment issued by CBP for unauthorized use of the SENTRI lane, the  
3 dollar amount of each fine, the location where such fines were  
4 incurred, and the frequency of fines issued since January 1, 2020;

5 (7) Complaints, whether formal or informal, filed since January 1, 2020  
6 by drivers or passengers who do/did not hold a SENTRI pass or  
7 are/were not members of the Trusted Traveler program for use of the  
8 SENTRI lane based on the imposition of penalties or demands for  
9 payment pursuant to 19 U.S.C. §§ 1618, 1623;

10 (8) All policies and/or formal or informal guidance related to the treatment  
11 of, imposition of penalties (including fines, demands for payment,  
12 and/or demands for and/or impounding of automobiles) against, and/or  
13 custody, release, and inspection of:

14 a. drivers of a vehicle who do not have the NEXUS pass or are not  
15 members of the Trusted Traveler program and who presented for  
16 inspection at a port of entry through the NEXUS lane;

17 b. passengers of a vehicle who do not have the NEXUS pass or are not  
18 members of the Trusted Traveler program, where the vehicle  
19 presented for inspection at a port of entry through the NEXUS lane;  
20 and

21 (9) Statistics reflecting the total number of fines and/or demands for  
22 payment (whether pursuant to 19 U.S.C. § 1618, 1623, or otherwise)  
23 issued by CBP for unauthorized use of the NEXUS lane, the dollar  
24 amount of each fine, the location where such fines were incurred, and  
25 the frequency of fines issued since January 1, 2020.

26 42. Plaintiff also sought a fee waiver under 5 U.S.C. § 552(a)(4)(A)(iii) on  
27 the grounds that (1) disclosure of the requested records will contribute significantly  
28 to the public understanding of government operations regarding the SENTRI and

1 NEXUS lanes, and (2) Plaintiff has the capacity, intent, and demonstrated ability to  
2 disseminate the requested information to a broad cross-section of the public,  
3 through his leadership and media liaison roles with AILA and the Los Angeles  
4 County Bar Association and through his blog.<sup>2</sup>

5 43. An agency that receives a FOIA request must respond within twenty  
6 business days after the receipt of the request. 5 U.S.C. § 552(a)(6)(A)(i). In its  
7 response, the agency must inform the requestor whether it intends to comply with  
8 the request, provide reasons for its determination, and inform the requestor of his or  
9 her right to appeal the determination. *Id.*

10 44. The 20-day deadline to respond to Plaintiff's request expired on  
11 October 16, 2023. As of the date of the filing of this Complaint, CBP has not  
12 responded to Plaintiff's request.

13 45. On November 28, 2023, in an effort to elicit a response without  
14 resorting to litigation, Plaintiff submitted, through counsel, a message on CBP's  
15 online FOIA platform, which has a specific link for submitting messages related to  
16 requests. The message asked for a status update on Plaintiff's request and offered  
17 to provide any necessary additional information. To date, Defendant CBP has not  
18 responded to this message.

---

21 <sup>2</sup> FOIA requires that documents shall be furnished without charge or at a reduced  
22 charge if disclosure of the information is in the public interest because it "is likely  
23 to contribute significantly to public understanding of the operations or activities of  
24 the government" and is "not primarily in the commercial interest of the requester."  
25 5 U.S.C. § 552(a)(4)(A)(iii). A requestor may also seek a waiver of search and  
26 review fees on the grounds that the requestor is a "representative of the news  
27 media" and the records are not sought for a commercial purpose. *See* 5 U.S.C. §  
28 552(a)(4)(A)(ii). A representative of the news media is "any person or entity that  
gathers information of potential interest to a segment of the public, uses its editorial  
skills to turn the raw materials into a distinct work, and distributes that work to an  
audience." *Id.*







1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

E. Grant such other relief as the Court may deem just and proper.

DATED this 21st day of February, 2024.

Respectfully submitted,

Law Office of Bardis Vakili P.C.

/s/ Bardis Vakili

Bardis Vakili

*Counsel for Plaintiff*