UNITED STATES DISTRICT COURT
IN THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JACQUELINE STEVENS,

Plaintiff,

vs.

ERIC HOLDER, Attorney General of the United States;
JUAN OSUNA, Director, Executive Office of Immigration Review;
FRAN MOONEY, Assistant Director for the Office of Management Programs, Executive Office of Immigration Review in her individual and official capacity;
MARYBETH KELLER, Assistant Chief Immigration Judge, Executive Office of Immigration Review, in her individual and official capacity;
GARY SMITH, Assistant Chief Immigration Judge, Executive Office of Immigration Review;
WILLIAM ANTHONY CASSIDY, Immigration Judge, Executive Office of Immigration Review in his individual and official capacity;
CYNTHIA LONG, Court Administrator, in her individual and official capacity

-ODE

Case No. 1:12-CV-1352

COMPLAINT FOR VIOLATIONS OF THE FIRST, FOURTH, AND FIFTH AMENDMENTS TO THE UNITED STATES CONSTITUTION (*BIVENS V. SIX UNKNOWN NAMED AGENTS OF FEDERAL BUREAU OF NARCOTICS*; FALSE IMPRISONMENT; ASSAULT; BATTERY

DEMAND FOR JURY TRIAL

DARREN EUGENE SUMMERS, Regional District Supervisor, Federal Protective Services, in his individual and official capacity; INSPECTOR DOE, Federal Protective Services; PARAGON SYSTEMS, INC., and PARAGON SYSTEMS INC.'s GUARD DOES 1-3; PARAGON SYSTEM INC.'s SUPERVISOR DOE

Defendants.

COMPLAINT FOR DAMAGES, DECLARATORY JUDGMENT, INJUNCTIVE RELIEF AND ACCESS TO IMMIGRATION COURT PROCEEDINGS IN THE NATURE OF MANDAMUS

COMES NOW Jacqueline Stevens and submits the above Complaint showing to the Court as follows:

1. Dr. Jacqueline Stevens is a United States citizen and resident of the State of Illinois. Her current address is at Political Science Department, Northwestern University, 601 University Place, Evanston, Illinois, 60208.

2. At all times relevant to this complaint Plaintiff was employed as a tenured professor in California and was conducting research in the state of Georgia for articles on immigration law enforcement published in books, national magazines, scholarly journals, and her blog. Plaintiff's scholarship on misconduct by immigration law enforcement officials, including that of immigration judges,

has been reported extensively, including on CNN, NPR; the *New York Times*; the *Christian Science Monitor*; and numerous local and national stories reported by AP and McClatchy wire services between 2009 and 2012.

3. For her reporting on secrecy in deportation proceedings and law-breaking by immigration law enforcement officials, including Defendant William Anthony Cassidy, Project Censored recognized Plaintiff' story in *The Nation* magazine as being fourth among the Top 25 Censored Stories for 2010.

4. Defendant Eric Holder is the Attorney General of the United States who ultimately oversees the Executive Office of Immigration Review (EOIR). He can be served at the United States Department of Justice (DOJ), 10th & Pennsylvania Avenue, N.W., Washington, D.C. 20530.

5. Defendant Juan Osuna is the Director of the EOIR. He can be served at 5107 Leesburg Pike, Suite 2600, Falls Church, Virginia 22041.

6. Fran Mooney is the Assistant Director for the Office of Management Programs at the EOIR responsible for security, space and facilities. She can be served at the EOIR, 5107 Leesburg Pike, Suite 1850, Falls Church, Virginia 22041.

7. MaryBeth Keller is an Assistant Chief Immigration Judge at the EOIR , responsible for managing investigations of misconduct complaints against immigration judges. She can be served at Office of the Chief Immigration Judge,

5107 Leesburg Pike, Suite 1850, Falls Church, Virginia 22041.

8. Defendant Gary W. Smith is an Assistant Chief Immigration Judge at the EOIR, responsible for investigating misconduct complaints against immigration judges in Georgia. He can be served at the EOIR, Office of the Chief Immigration Judge, 5107 Leesburg Pike, Suite 2500, Falls Church, Virgina 22041.

9. Defendant William Anthony Cassidy is an adult U.S. citizen and resident of Georgia who at all pertinent times was licensed to practice law by the state of Ohio and is employed by the EOIR as an immigration judge. On information and belief, at the present time and during all times pertinent to this complaint he manages and issues orders on immigration cases for EOIR immigration courts in Atlanta, Georgia and Lumpkin, Georgia. Based on information and belief, Defendant Cassidy presently works at 180 Spring Street, S.W., Atlanta, Georgia 30303 and can be served at this address.

10. Defendant Cynthia Long is the EOIR administrator for the Atlanta court. Based on information and belief, Defendant Long presently works at 180 Spring Street, S.W., Atlanta, Georgia 30303 and can be served at this address.

11. Defendant Darren Eugene Summers is an adult citizen who, on information and belief at all times pertinent to this complaint was employed by the Federal Protective Services (FPS), an agency of the Department of Homeland

Security (DHS) as Central District Commander and thus responsible for supervising FPS Inspector DOE who supervises building security at 180 Spring Street, S.W., Atlanta, Georgia, 30303. ("Definitions. Law Enforcement Supervisors. FPS law enforcement officials, such as area commander, district commander, or supervisory special agent, who serve as the approval authority for reports submitted by law enforcement officers," from FPS Directive No. 15.5.1.5, valid through 09/30/2014). On information and belief Darren E. Summers resides at 3156 Mount Zion Road, Stockbridge, Georgia 30281 and can be served at this address.

12. Based on information and belief, FPS Inspector DOE has direct supervisory responsibility over Paragon Systems guards at 180 Spring Street, S.W. Atlanta, Georgia 30303 ("FPS inspectors are primarily responsible for responding to incidents and demonstrations, overseeing contract guards..." from GAO-08-683, June 2008, p. 7).

13. On information and belief, Defendant Paragon Systems, Inc. is a foreign corporation doing business in the Northern District of Georgia. On information and belief, Defendant Paragon Systems, Inc., is a corporation authorized to conduct business in the State of Georgia, whose registered agent for service is CT Corporation System, located at 1201 Peachtree Street, N.E., Atlanta, Georgia

30361.

14. According to information and belief, Paragon Systems, Inc. at all times pertinent to this complaint was under contract with DHS to manage building security for 180 Spring Street, S.W., Atlanta, Georgia.

15. In addition to Defendant Paragon Systems, Inc., unknown named employees of Paragon Systems are sued under fictitious names as "Paragon DOES 1-3" because their true names were withheld from Plaintiff at the time of the incident underlying this complaint and redacted from documents obtained under 5 U.S.C. § 552, and their capacities, and degree of responsibility for the acts alleged herein are unknown to the Plaintiff at this time. When Plaintiff ascertains this information, she will amend this Complaint accordingly. Defendant Paragon DOES 1-3 were on April 19, 2010, employees of Paragon Systems, Inc. under contract with the Department of Homeland Security and charged with the supervision of building security at 180 Spring Street, S.W., Atlanta, Georgia.

JURISDICTION AND VENUE

16. Plaintiff claims against Defendants Eric Holder, Fran Mooney, MaryBeth Keller, Gary Smith, William Anthony Cassidy, Darren Eugene Summers, FPS Inspector Doe, Paragon Systems, Inc., and Paragon System, Inc's Guard Does 1-3

and Paragon Supervisor Doe are brought pursuant to *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971) and under the First, Fourth, and Fifth Amendments to the United States Constitution.

a. This court has jurisdiction due to 28 U.S.C. § 1331, § 1361, §2201 and/or 5 U.S.C. § 701 et seq.

b. Venue is proper according to 28 U.S.C. § 1391 because upon information and belief most of the Defendants reside in this district, conduct official business in this district, and a substantial part of the events or omissions giving rise to this claim occurred in this District.

FACTS

17. Defendants' conduct violated the rights of the Plaintiff, the public and the press guaranteed by the U.S. Constitution. The articulated reasons for prohibiting Plaintiff and others from observing immigration court hearings are based on pretext and not legally justifiable.

18. On multiple occasions Plaintiff had been unlawfully prevented from observing hearings or removed from them after hearings were underway and she has observed in her physical presence this treatment toward other members of the public by officials of the DHS and DOJ, including by Defendant Cassidy.

19. Based on information and belief, Defendant Cassidy was assisted in

evading legal and public accountability through the efforts of his colleagues Defendant Cynthia Long, Defendant MaryBeth Keller, and Defendant Gary W. Smith to obstruct justice, including fabricating and destroying official documents.

20. On information and belief, the actions above exploited laws Congress crafted to protect immigrants' privacy and asylum rights, including demonstrably pretextual invocations of "sexual abuse" cases when none existed (Points 35-46).

21. This miscarriage of law and justice was perpetrated at the agency's highest levels, including by individuals in the Office of the General (OGC) (Point 40), the division responsible for ensuring the agency's legal compliance.

22. On April 19, 2010 Plaintiff was observing immigration hearings conducted by Defendant William Anthony Cassidy in court room 5 at 180 Spring Street, S.W. Atlanta, Georgia. On this day, Defendant Cassidy enlisted the muscle of his co-defendants against Plaintiff in order to continue to shroud in secrecy his unlawful deportations, thus by their actions individually and jointly causing Plaintiff's constitutional rights to be violated.

EOIR PRACTICE OF UNLAWFUL SECRET HEARINGS

October 7, 2010

23. On October 7, 2009 Defendant Cassidy avoided accountability for his hearings by leaving his courtroom after noting observers.

24. Defendant Cassidy avoided accountability for preventing media access to his hearings that same afternoon by telling the public affairs officer Susan Eastwood that in Plaintiff's presence he had affirmed that two survivors of sexual abuse requested a closed hearing (Point 35). Cassidy's alleged exchange with sexually abused respondents, supposedly discussed in Plaintiff's presence, is noted in an email from Eastwood to other colleagues at the EOIR. In addition to being falsified by the information presented below, it can be easily refuted by Lyttle, Attorney A (Point 33), and the EOIR case management database.

25. On October 7, 2009 Defendant Cassidy unlawfully avoided holding a public hearing after ascertaining the presence of the Plaintiff and Mark Lyttle in courtroom. Lyttle is a U.S. citizen whom Defendant Cassidy had unlawfully deported in 2008 (Point 123). Defendant Cassidy and his supervisors lied and obstructed justice in a failed effort to convince Plaintiff that her exclusion was lawful. Based on information and belief, Defendant Cassidy did not want public scrutiny of his hearings by Plaintiff or other court observers.

26. On October 7, 2009 at approximately 1:25 p.m. Plaintiff Cassidy arrived in courtroom #5 to preside over a 1 p.m. docket that was posted in the EOIR waiting room and listed three cases.

27. The court room included an attorney (hereafter "Attorney A"), a woman

who arrived with Attorney A and was the wife of a man who was detained at Stewart Detention Center and agreeing to voluntary departure. A third adult introduced himself to Plaintiff as a court interpreter. No other respondents or attorneys were present.

28. After entering, Defendant Cassidy immediately ascertained the purpose of each individual's presence. Mr. Lyttle and Plaintiff said they were observing. After hearing this reply, Defendant Cassidy immediately exited the court room, providing no explanation to the respondent (appearing via televideo) or Attorney A.

29. A few minutes later, Atlanta court administrator Defendant Cynthia Long opened the door and from the hall and told Plaintiff and Lyttle they had to leave. Then she scolded them for not "checking in"; asked for their names, and told them they were not allowed to stay because asylum hearings were scheduled.

30. Plaintiff asked Long if the respondents had requested closed hearings and the three moved to the EOIR lobby. Defendant Long provided several conflicting accounts about why Plaintiff and Lyttle were not allowed to attend hearings and none were credible.

31. Plaintiff knew of EOIR data indicating only a small fraction of immigration cases involve asylum or related claims. Of the 325,326 hearings that

were held in 2010 the EOIR classified just 2,095 as invoking claims of "Credible Fear" (1,165) "Reasonable Fear" (398) or "Asylum" (532) (source: EOIR Statistical Yearbook, Table 3 C3). Plaintiff questioned Defendant Long on the inconsistencies and indicated she did not believe that all three cases on Cassidy's docket that afternoon included asylum claims.

32. Defendant Long told Plaintiff she would check further about these cases and left the lobby. After a few minutes she returned and said Plaintiff and Lyttle could sit in on a case. Plaintiff and Lyttle walked back to court room 5 and encountered in the hallway Attorney A. He informed Plaintiff that the husband and wife were saying goodbye to each other via televideo and Plaintiff, Attorney A, and Lyttle remained in the hallway to give them privacy.

33. After the wife exited, Plaintiff and Lyttle entered and sat down. A few minutes later, Long entered and said that no further hearings were scheduled and Plaintiff and Lyttle should leave. This was at approximately 1:50 p.m.

34. At no point did Plaintiff encounter Cassidy any further on October 7, 2009.

35. An October 7, 2009 email from EOIR Public Affairs officer Susan Eastwood sent and copied at 2:13 p.m. to various EOIR officials states in parts pertinent to this complaint,

> ... I spoke to Cynthia who advised that Jackie was allowed to observe a removal hearing today in Atlanta, but was not allowed to observe an asylum hearing – at the request of the respondents. I spoke to Judge Cassidy who advised that, in Jackie's presence, he advised the respondents and their attorneys that a member of the media was present and asked if they wanted an open or closed hearing. Both respondents advised they wanted a closed hearing (sexual abuse case).
>
> (from pp. 95 -96, EOIR FOIA case 2010-12055, pt. 2, received in Fall, 2011).

36. At approximately 4 p.m. on October 7, 2009, Eastwood returned Plaintiff's phone call. During their conversation Plaintiff asked if there were an EOIR policy requiring observers to "check in" before attending hearings and indicated her frustration with her inability to attend hearings as well as the lack of transparency about the events that afternoon. At no point did Eastwood state that Cassidy had closed his hearings in Plaintiff's presence because they were sexual abuse cases

37. Distrustful of Defendant Long's explanation, Plaintiff filed a request under 5 U.S.C. § 552 for Defendant Cassidy's October 7, 2009 1 p.m. docket. On October 7, 2009 in the Atlanta EOIR lobby it listed three cases. On January 25,

2010, the EOIR OGC's FOIA staff sent Plaintiff a docket listing one hearing, a case about which EOIR officials knew Plaintiff had copied on October 7, 2009.

38. The January 25, 2010 cover letter signed by Crystal Souza, states: "Please be advised the original Immigration Court calendar could not be located."

39. On information and belief, the individual responsible for responding to FOIA requests for the Atlanta court is Defendant Long.

40. In response to Plaintiff inquiries about the missing cases Plaintiff received an unsigned statement via email from EOIR Public Affairs officer Elaine Komis. It states in pertinent part, "The third hearing for October 7, 2009, was recalendared for another day at the request of the respondent's attorney prior to October 7. It appeared on the October 7 calendar due to administrative oversight." On January 20, 2010, Elaine Komis exchanged email with Robin Stutman and Heidi Brissette of the EOIR OGC under the subject heading: "Document Fraud Question re: Jackie Stevens Query." Stutman writes, "We will draft a response and get back to you."

41. According to an immigration judge and an EOIR court administrator, the cases are maintained in an EOIR database and, if recalendared, do not disappear unless someone with access to the database deletes them or otherwise changes their codes.

42. Plaintiff earlier had called the attorney listed (hereafter "Attorney B"). Attorney B's secretary confirmed that her boss on that date had a telephonic hearing before Defendant Cassidy and stated definitively that the client was not seeking asylum.

43. Attorney A's case was not an asylum case nor was Attorney B's case an asylum case; since the EOIR asserts a third case was "recalendared" Cassidy's alleged statement to Eastwood is demonstrably inconsistent with the cases tracked for that date: Hearings for cases involving attorneys A and B, and two sexual abuse cases, and one recalendared case would require the afternoon docket to show five cases, not the three that were posted. The EOIR data later also do not accommodate Cassidy's claim to have heard two cases involving sexual abuse: two cases heard, plus the case of Attorney B (the one case listed on response to Plaintiff's FOIA request), and Stutman's claim of a third "recalendared" hearing add up to four hearings, not the three the EOIR confirms were posted that afternoon .

44. This event and others Plaintiff saw first-hand and heard repeated by other Atlanta court observers put Plaintiff on notice that Defendant Cassidy and his colleagues at the EOIR were intent on evading the laws, regulations, and procedures mandating public observation of immigration hearings.

April 19, 2010

45. On April 19, 2010 Defendant Cassidy's docket included cases of individuals who were imprisoned in a facility managed by the Corrections Corporation of America, Inc. (CCA), in Lumpkin, Georgia, approximately 145 miles south of Atlanta, Georgia. The attorney representing the government on information and belief was Anthony Cacavio. Communication among the parties occurred via televideo.

46. At 10:21 a.m. Eastwood sent an email to her EOIR colleagues Lauren Alder Reid, Elaine Komis, Kathryn Mattingly, and Crystal Riley with the subject heading "Jackie Stevens is at the Atlanta Immigration Court" stating "[s]he's currently observing Judge Cassidy's televideo hearings (he's doing Stewart docket via VTC today). He called to let us know."

47. At 10:22 a.m. Reid forwarded this message to Fran Mooney and Scott Cohen, also of the EOIR. (EOIR FOIA 2010-12055 pt 2, p. 306).

48. Shortly after the proceedings began, and after Defendant Cassidy had ascertained Plaintiff's presence in courtroom 5 there was a televideo failure in the middle of the hearing, a frequent occurrence to which immigration judges typically respond by rebooting the connection. However, that morning, without rebooting,

Defendant Cassidy told the crowded court room that he could not hear any more cases.

49. The respondent attorneys were collectively taken aback and objected. Defendant Cassidy said, "If we can't make a connection and hear..." The attorneys told him to call back. Defendant Cassidy relented and requested staff to reconnect; this occurred and the hearings continued.

50. The video of courtroom 5 that detained respondents view on the Lumpkin monitor includes the dais and those behind it, typically the immigration judge and, if present, an interpreter and court staff. Respondent attorneys, if any, and court observers normally cannot be seen by detained CCA respondents in Lumpkin.

51. On April 19, 2010, shortly after 3 p.m. and after the court had cleared of all attorneys, Defendant Cassidy left the dais and approached the Plaintiff, who was seated in the first row and had no difficulty understanding Defendant Cassidy's verbal statements heretofore.

52. Defendant Cassidy, standing directly above the Plaintiff, told the Plaintiff that he was asking her to leave. Plaintiff requested a legal reason for his request and referenced the first sentence of 8 CFR § 1003.27 - Public access to hearings – stating "[a]ll hearings, other than exclusion hearings, shall be open to

the public," subject to certain specific exceptions. Defendant Cassidy repeated his request that she leave.

8 CFR §1003.27 in its entirety states:

All hearings, other than exclusion hearings, shall be open to the public except that:
(a) Depending upon physical facilities, the Immigration Judge may place reasonable limitations upon the number in attendance at any one time with priority being given to the press over the general public;
(b) For the purpose of protecting witnesses, parties, or the public interest, the Immigration Judge may limit attendance or hold a closed hearing.
(c) In any proceeding before an Immigration Judge concerning an abused alien spouse, the hearing and the Record of Proceeding shall be closed to the public unless the abused spouse agrees that the hearing and the Record of Proceeding shall be open to the public. In any proceeding before an Immigration Judge concerning an abused alien child, the hearing and the Record of Proceeding shall be closed to the public.
(d) Proceedings before an Immigration Judge shall be closed to the public if information subject to a protective order under § 1003.46, which has been filed under seal pursuant to § 1003.31(d), may be considered.

53. Plaintiff asked Defendant Cassidy if the respondent had requested a closed hearing – as this would be legal grounds for closing a hearing. Defendant Cassidy said, "No, the respondent is pro se."

54. Defendant Cassidy then said he could "order" guards to remove Plaintiff. Plaintiff asked if Defendant Cassidy could provide a legal reason for closing the hearing. Defendant Cassidy said, "No," and told Plaintiff to remain in the court room, that he would return with a copy of the relevant regulation. This exchange between Plaintiff and Defendant Cassidy occurred in conversational

tones and lasted approximately 90 seconds. At no point did Plaintiff indicate she would refuse Defendant Cassidy's request nor behave in any manner lacking propriety, nor did Eastwood observe this in her email reflecting Defendant Cassidy's phone call to her shortly before 3:12 p.m. (Point 91).

55. Defendant Cassidy left through the rear of courtroom 5. Concerned about Defendant Cassidy's threat to order guards to physically remove Plaintiff, and concerned that he was leaving the court room to effect this threat, Plaintiff told Defendant Cassidy's assistant, seated on the dais, that Plaintiff would be waiting in the immigration court lobby, located several corridors away from courtroom 5, and that in the unlikely event the respondent had followed any of their exchange and requested her presence, Plaintiff would return. This statement occurred outside the presence of Defendant Cassidy.

56. From approximately 3:00 p.m. until approximately 3:15 p.m. on April 19, 2010, Plaintiff was in an EOIR waiting area, first informing EOIR court staff Marion Crosby about Defendant Cassidy's unlawful actions and then writing in her notebook.

57. According to an email sent the next day, April 20, 2010, from EOIR court staff Marion Crosby to Cynthia Long EOIR Atlanta court administrator, Crosby was notified that the guards were planning to remove Plaintiff prior to that

event occurring. Out of earshot from Plaintiff, Crosby was *not* asking them to remove Plaintiff from the building:

... "Officer [REDACTED] was proceeding to the Immigration Court waiting room, and I informed him that I was not requesting for her to leave the building, but she is currently not allowed in courtroom #5. The officer indicated that he understood and still proceeded into the waiting room. I heard the officer ask her to come back with him..."

This statement is consistent with those Crosby made to Plaintiff on April 19, 2010.

58. At approximately 3:15 to 3:20 p.m. three guards (DOES 1-3) employed by Defendant Paragon Systems, Inc. crowded the small space between the entrance and the Plaintiff's chair, where she was writing in a notebook. Defendant Paragon DOE 1 stood over her and said, "It's time to leave." Plaintiff asserted her right to observe immigration court hearings and asked for the reason for ordering her removal and the name of the person ordering the actions of DOES 1-3. Plaintiff's questions went unanswered. Defendant Paragon DOES 1 -3 jointly told Plaintiff to leave the building. Defendant DOE 1 removed his handcuffs from his belt. Plaintiff stood up and walked out of the EOIR lobby and toward the building exit, closely crowded by Defendant DOES 1-3.

59. Between the EOIR lobby and the building foyer, Plaintiff asked DOE 1 his name. He replied, "Officer Out the Front Door."

60. In the building foyer, Plaintiff turned her head and tried to read the names on the guards' shirt tags. Plaintiff believes DOE 1's name tag said "Hayes" or "Hays." After Plaintiff made this effort to read the name tag, DOE 1 pushed Plaintiff's shoulder and side with his hands from her left. DOE 2 also had his hands on the right side of Plaintiff's torso.

61. During the time frame when Plaintiff and Defendants DOES 1-3 were in the building foyer, DOE 1 told another guard, "Judge Cassidy wants her out of here! He wants her out of the building!"

62. NPPD 10F202 is a transcript of a conversation between Defendant Paragon DOE 1 and the MegaCenter Operator in Battle Creek, Michigan, time-stamped as recorded between 3:25:26 p.m. and 3:31:41 p.m. on April 19, 2010. (Sent to Plaintiff on September 27, 2011 in response to a request made under 5 U.S.C. § 552.) The transcript indicates that the first initial of Defendant Paragon DOE 1 is "N."

63. According to information furnished by the Georgia Secretary of State, Nathaniel Hayes (license #SGE053828) has been associated with Paragon Systems, Inc. (license #PSC001821) to be employed as a "security guard."

64. NPPD10F202 indicates that Defendant Cassidy's actions directly caused Plaintiff's false imprisonment, assault, and battery and violated her First, Fourth, and Fifth Amendment rights.

65. NPPD10F202 shows as well that Paragon Defendant DOES 1-3 lacked probable cause for ordering Plaintiff to leave the immigration courts or lobby:

MEGACENTER OFFICER: Do you have a DOB on her?

PCO: No, ma'am. We didn't get anything from her, 'cause we wasn't told everything that happened, that transpired in there until afterwards. We were only told to just escort her off the property. So, when we came back in, they gave us everything then, of what went on.

....MEGACENTER OPERATOR: Who asked you to escort her off? The judge?

PCO: The judge, yes ma'am.

MEGACENTER OPERATOR: Good.

PCO: And one of the young ladies that works in the court hearings – what is her last name [REDACTED] something?

MEGACENTER OPERATOR: In the court clerks?

PCO OFFICER: Yes, ma'am. Court clerks.

MEGACENTER OPERATOR: Okay. So they asked you guys to remove

her, right?

PCO Yes, ma'am...

By his own admission, Defendant Paragon DOE 1 said he and the other guards "were only told to just escort her off the property" and thus lacked an articulable justification for their actions.

UNLAWFUL USE OF FORCE BY FEDERAL ACTORS OUTSIDE SCOPE OF EMPLOYMENT

66. Employees from one executive department lack supervisory authority over those from another branch of government (U.S. Government Manual, Organization Chart, GPO, 2012).

67. On information and belief, at all times pertinent to this complaint, the DHS had responsibility for building security at 180 Spring Street, S.W., Atlanta, Georgia.

68. On information and belief, Defendant Paragon Systems, Inc. was under contract #25126656 with the DHS for "guard services" at 180 Spring Street, S.W. Atlanta, Georgia at all times relevant to this complaint (Fedspending FY 2009 3Q).

69. According to a webpage maintained by the DOJ, "The Atlanta, Georgia, Immigration Court falls under the Office of the Chief Immigration Judge, which is

a component of EOIR under the Department of Justice."

70. Defendant Cassidy is employed by the EOIR.

71. Defendant Cassidy may report to law enforcement officials outside the DOJ allegations of law-breaking, and these law enforcement officials or guards under contract to them may initiate investigations, and if they independently ascertain unlawful behavior may act appropriately. It is outside the scope of Defendant Cassidy's employment to order the use of force or any other actions by private guards under contract with another the DHS or its subsidiary agencies.

72. EOIR employees are cognizant of their lack of supervisory authority over guards under contract with the DHS. On March 26, 2009, EOIR Public Affairs Officer Elaine Komis told Plaintiff that the EOIR "only controls our own buildings," meaning those whose security is handled through DOJ employees and contracts. Komis said that the EOIR was unable to assist with reporters' access to immigration courts in detention centers under the control of private CCA guards under contract with ICE, an agency of the DHS.

73. On information and belief, employees of the EOIR have stated before, on, and after April 19, 2010 in their official documents, protocols, on their web pages, in internal memoranda, and in numerous public statements and interviews with journalists about immigration court security policies nationwide that DOJ

employees lack legal authority to control the access to buildings whose security is managed by Homeland Security employees or private security firms under contract with the DHS.

74. On April 19, 2010 at approximately 5:10 p.m. Plaintiff called the EOIR from the Atlanta airport to report the incident and spoke with Lauren Alder Reid. Reid told Plaintiff that Defendant Cassidy had no authority over the guards at the immigration courts.

75. Based on information and belief, FPS Central District Commander Defendant Darren Summers and Defendant FPS Inspector DOE at all times relevant to this complaint had supervisory authority of building security at 180 Spring Street, S.W., Atlanta, GA.

76. In a telephone conversation with Plaintiff on or about April 27, 2010 Defendant Summers claimed that Defendant Cassidy was a "federal judge" and also that immigration courts were under the jurisdiction of the DHS.

77. Defendant Summers also indicated that he had no understanding of the regulations concerning public access to immigration courts. He asked Plaintiff, "What were you doing hanging out there?" and "Who detailed you?" The conversation in its specifics and totality demonstrated that Defendant Summers had no understanding of the chain of command in his own agency and thus would be

unable to train his subordinates on these matters. Insofar as chain-of-command is crucial expertise for law enforcement personnel, and especially if one's job description includes the supervision of law enforcement personnel on premises that may house more than one agency, Defendant Summers' ignorance on these matters was especially shocking.

78. According to an email received by Plaintiff on November 16, 2010 from Reverend Tracy Blagec, a resident of Georgia who has attempted to observe hearings in the Atlanta immigration courts, "one of the heads of security, Dan Piccolo (uncertain of spelling) casually mentioned (during a conversation about something else while we were holding a prayer vigil [in August, 2009] outside the building) that the judges routinely tell security to not allow observers in court. [H]e just said it like it was matter of fact and ok."

79. Defendant Summers was grossly incompetent in his understanding of the DHS chain of the command (Point 77). Knowledge of basic chain-of-command components and protocols is essential for protecting citizens' due process rights. Defendant Summers's deficiencies in this respect directly led to Plaintiff's false imprisonment, assault, and battery and deprived her of her rights under the First, Fourth, and Fifth Amendment.

DEFENDANTS CASSIDY AND GARY SMITH OBSTRUCT JUSTICE

80. The EOIR on its web page solicits misconduct complaints. The attorney who coordinates these is Defendant Assistant Chief Immigration Judge MaryBeth Keller, who during all times pertinent to this complaint was in EOIR headquarters in Falls Church, Virginia.

81. At the time pertinent to this complaint, the attorney charged with investigating complaints lodged against Atlanta IJs was Defendant Assistant Chief Immigration Judge Gary Smith, also an attorney in the EOIR headquarters.

82. According to information on the EOIR web pages, neither Defendants Keller nor Smith have among their job responsibilities any recognizably judicial roles, their job titles notwithstanding. Their sole responsibilities include supervision of the operations of the immigration courts, not assisting with deciding the outcomes of immigration cases.

83. On or about April 27, 2010, Plaintiff submitted a detailed complaint about the events pertinent to this complaint to Defendant Keller.

84. On or about June 3, 2010, Defendant Smith sent Plaintiff a letter with numerous false statements, all exonerating Defendant Cassidy. Defendant Smith never contacted Plaintiff for purposes of this investigation, in defiance of agency policy as conveyed by Defendant Keller to Plaintiff, and refused his agency's FOIA

officer's repeated requests for documents responsive to a request of that office by Plaintiff made on June 10, 2010 under 5 U.S.C. §552.

85. Instead of affirming the legality of Defendant Cassidy's actions on April 19, 2010, Defendant Smith's letter asserted they did not happen.

86. This letter is itself crucial evidence of Defendant Smith's and Cassidy's belief that the statements and actions Defendant Cassidy actually undertook on April 19, 2010 were unlawful.

87. According to information and belief, the source of the description of Defendant Cassidy's actions and statements pertinent to this complaint narrated in a letter of June 3, 2010 from Defendant Smith to Plaintiff was Defendant Cassidy. Defendant Smith writes:

"The second matter you raised pertained to Judge Cassidy ordering a security officer to have you removed from the building. My inquiry does not reveal that to be substantiated, and there is no indication that the judge ordered you removed from the building."

But see Point 65.

88. The letter states as well: "Judge Cassidy asked you to leave the courtroom because he needed to inquire of a *pro se* respondent whether the respondent wished to have the hearing closed to the public. Judge Cassidy told you

that after speaking with the respondent in the case, if he deemed it appropriate, he would permit you to return. After talking with the respondent, the judge deemed it appropriate under 8 Code of Federal Regulations, Section 1003.27, to exclude the public from that hearing."

89. This account is inconsistent with what occurred (Points 51 to 65) and additional independent facts. The time-line of these events does not permit for the type of conversation Defendant Smith describes. Before Defendant Cassidy could have held this conversation, Plaintiff on his order already was being pushed out the building.

90. According to a copy of the Cassidy's Lumpkin docket for April 19, 2010, no evidentiary asylum hearings were calendared.

91. A 3:12 p.m. email on April 19, 2010 paraphrasing the contents of a phone call from Defendant Cassidy to Susan Eastwood in EOIR headquarters mentions Defendant Cassidy's desire to speak with the government attorney and not a pro se respondent: "Judge Cassidy just called to advise that he had to ask Jackie to leave the courtroom while he conferred with counsel." The message also includes statements made by Plaintiff to his assistant outside the presence of Defendant Cassidy, thus proving Plaintiff's conversation with Defendant Cassidy's assistant occurred before 3:12 p.m.

92. Defendant Cassidy threatened Plaintiff directly with forced removal (Point 54); Paragon Guard DOE 1 made at least three contemporaneous statements that Defendant Cassidy ordered Plaintiff's removal from the building, two of which are documented in this complaint (Point 65); and, Defendant Paragon DOE 1 tells the MegaCenter Operator "they're trying to ban her from the building" (NPPD10F202).

93. For Defendant Smith to assert in his official response to a complaint about Defendant Cassidy that there was "no indication that the judge ordered [Plaintiff] removed from the building" not only defies credibility but is evidence of obstruction of justice.

94. "Evidentiary hearings involving an application for asylum or withholding of removal ('restriction on removal'), or a claim brought under the Convention Against Torture and Other Cruel, Inhuman, or Degrading Treatment or Punishment, are open to the public unless the respondent expressly requests that the hearing be closed. In cases involving these applications or claims, the Immigration Judge inquires whether the respondent requests such closure. (Immigration Court Practice Manual, 4.9).

95. Defendant Cassidy's Lumpkin and Atlanta caseload for April 19, 2010, Cassidy's docket *included no evidentiary asylum hearings* (EOIR 2010-12055 pt.

1). Thus, Defendant Smith's claim that he reviewed a case consistent with inquiring about a request for a closed hearing defies credibility.

96. DHS and EOIR officials as well as a Paragon guard also demonstrably lied about the events above (see below Points 85-108). This cover-up demonstrably concedes their awareness of the illegality of their actions, their obstruction of justice, and their intention to harm and violate the rights of the Plaintiff.

97. According to the FPS Incident Report Form 3155 for reporting Plaintiff's removal from 180 Spring Street, S.W., Defendant Paragon DOE 1 writes, "Supervisor [REDACTED] came to the lobby and asked us to remove Ms. Stephens" (sic)(p. 4).

98. This statement contradicts the statement Paragon DOE 1 made to the MegaCenter Operator on April 19, 2010. (MegaCenter Operator: Who asked you to escort her off? The judge? PCO: The judge, yes ma'am.")

99. Plaintiff alleges that the statement in Point 97 is fabricated for inclusion on Form 3155 to hide the unlawful actions of Defendants Cassidy, Defendant Paragon Does 1-3, Defendant Summers, and Defendant FPS Inspector DOE.

100. Plaintiff, pursuant to 5 U.S.C. 552, requested all FPS documents related to the incidents of April 19, 2010. FPS Directive 15.1.5.5 requires

Defendant FPS Inspector DOE to investigate all incident reports. The absence of any investigative report among the documents to Plaintiff indicates that Defendant Paragon Inspector DOE was negligent in ensuring that the public not be falsely imprisoned, assaulted, or battered by private guards under his supervision, and that Defendant Regional Director Summers was likewise negligent in not procuring this investigative report after he was on notice about the injuries to the Plaintiff pursuant to depriving Plaintiff of her First, Fourth, and Fifth Amendment rights.

101. Defendant Paragon DOE 1 filed an incident report, Form 3155. Based on information and belief, the report was written at some distance from April 19, 2010, the date on which it is purportedly written. It is crafted to avoid legal liability for the unlawful actions undertaken throughout the DHS chain of command.

102. The space above the line for the supervisor signature is blank.

103. The "Report Time" is "1529." "Occur Time Span" is "1529 __ [BLANK]". It states that "At 15:47 Inspector [REDACTED] was called... Inspector [] advised me to called [sic] Battle Creek and do a 3155. Battle Creek was called at approx. 1550."

104. The times in the 3155 report do not coincide with the times on the Battle Creek transcript.

105. In the 3155 report, Defendant Paragon Doe 1 writes, "Supervisor [REDACTED] came to the lobby and asked us to remove Ms. Stephens." (sic) On information and belief, that is not what occurred.

106. The independent transcript of a recording demonstrably proximate to the events reveals Defendant Paragon DOE 1 clearly indicating that "the judge" personally told him to remove Plaintiff from the building, not his supervisor.

107. The misrepresentation of a material fact about the chain of command resulting in Plaintiff's assault, battery, false imprisonment, and preventing her from collecting information instrumental to her rights under the First amendment demonstrate Defendant Paragon Doe 1's knowledge that the events described in points 55 to 65mplicate him and his co-defendants in actions that were unlawful.

108. On information and belief, Defendant Cassidy's personal docket listed 46 cases on April 19, 2010, of which two were non-evidentiary pro se asylum cases. One record indicates the case was adjourned because the respondent was "not presented for hearing." The second indicates that Defendant went on the record with the respondent but adjourned to provide respondent time to seek counsel. As of April 19, 2010 this respondent had either appeared or had cancelled 10 previous hearings with Defendant Cassidy. As of November 24, 2010, seven more appearances had occurred, the last one cancelled, the record indicates,

because of televideo failure. Plaintiff notes for that date indicate that this case was not discussed in her presence.

109. The hearing history of this case is consistent with the pattern of abusive calendaring for which the DOJ, the EOIR, and the Atlanta Immigration Court have been sued by Edward Bloodworth of Macon County, Georgia (5:42-CV-020), filed January 17, 2012.

110. Bloodworth has been married since 2001 to a South Korean citizen whom he had sponsored for legal residency in 2004 and who had been in ICE detention in Irwin County, Georgia for nine months subsequent to a shoplifting conviction.

111. Cassidy refused to hold a merits hearing for nine months, despite Defendant Cassidy's awareness of her Stage 3 breast cancer and the adequacy of her documents justifying a waiver of removal so that she could adjust her status.

112. Based on belief and information, on or about February 9, 2012, Cho was informed that her hearing date had been moved up and she would be taken to the Atlanta immigration court the next day. Based on information and belief, immigration judge J. Dan Pelletier had assumed responsibility for her case and scheduled a merits hearing for the following week during which he approved the documents Bloodworth and Cho filed on her behalf and ordered her released.

113. Based on information and belief, the EOIR criteria for performance review incentivizes IJs to issue decisions in simple cases and also on behalf of government attorneys and not to hold merits hearings for complex cases, including asylum cases.

114. If the IJ does not issue a decision, then respondents are detained interminably. Experiencing this as hopeless, they sign deportation orders agreeing to their removal.

115. Based on information and belief, respondents who find themselves in this situation express their anger and frustration because even an adverse decision, which they may appeal to the Board of Immigration Appeals, is better than no decision.

116. Based on information and belief, an IJ with respondents who find themselves in this position would have a strong preference to avoid these cases being seen by a reporter.

"IMMIGRATION JUDGES" ARE NOT JUDGES AND THE EOIR IS NOT A JUDICIAL AGENCY

117. Judges, including administrative judges, enjoy sovereign immunity from civil claims against them while they are serving in a judicial capacity.

119. The hearing room furniture and official seal, the attire of the EOIR

attorney, and the job title of "immigration judge" nominally indicate that the activities in their midst are judicial procedures and that those effecting such procedures are acting in a judicial capacity. But there is no empirical sanction for characterizing a hearing as "judicial" in U.S. jurisprudence on the basis of props and title alone. Indeed the concept of the kangaroo court aptly conveys the intuition that reasonable people may on inspection distinguish between those contexts where procedures, contexts, and temperament truly are judicial and those where they have the trappings of such contexts but no other meaningful similarities.

120. Dana Marks, co-president of the National Association of Immigration Judges stated in an interview with Plaintiff, "As long as we are housed in the culture of a law enforcement agency, it's going to be difficult to achieve judicial neutrality." ("Lawless Courts," *The Nation*, November 8, 2010).

121. Marks has endorsed an American Bar Association proposal to radically reorganize the federal immigration courts so that they will acquire the judicial character they presently lack.

122. Structural bias toward one party is inconsistent with judicial proceedings.

123. The distance between judicial proceedings and the events that transpire

in the hearings over which Defendant Cassidy presides is not hypothetical. In his order of March 31, 2012 in *Lyttle v. U.S.A. et al.* Case No. 4:11-CV-152, U.S. District Court Judge Clay Land writes "Despite Lyttle's mental disabilities, the IJ [Defendant Cassidy] did not assess whether Lyttle was competent to proceed unrepresented in his removal proceedings or waive his right to counsel. The IJ did not determine whether safeguards were necessary to ensure Lyttle received a fair hearing. Construing these allegations in Lyttle's favor, it is reasonable to infer that the IJ simply rubber-stamped the false conclusion and unsupported record constructed by North Carolina ICE and the Georgia ICE Defendants that stated Lyttle was a citizen of Mexico" (p. 15).

124. Land's characterization of Defendant Cassidy's actions is consistent with events noted in an interagency email; the fact that mass hearings are occurring under the supervision of more than one judge and with the full assent of the EOIR top officials further shows the absence of any distinctly judicial character to its employees.

125. On April 13, 2010, a desk clerk working at the immigration hearing rooms in the CCA facility at Lumpkin, Georgia sent the following message to court administrator Ray Bethune:

"Subject: Problem...

Ray- That reporter woman is back and being argumentative about being allowed in the Courtroom. The courtroom is full! 97 detainees. We are suggesting that she wait until we do that mass removal and then allow her in. She refuses to take no for an answer. She is arguing with Sgt Perry also. Any suggestions on how to handle this?" (EOIR FOIA 2010-12055, p. 315, received January 9, 2012 in response to Plaintiff request of June 3, 2010)

126. "Mass removals" are not lawful under EOIR or any other DOJ procedures. According to the Immigration Judge (hereafter IJ) Benchbook: "[A]ll salient points discussed in the non-detainee setting must be covered in the detainee setting as well. In the detainee setting, it is important to get individualized answers from each respondent to important matters."

127. The windowless room in which the 97 people may or may not have heard their names called, and may or may not have heard and understood they were all being ordered removed, at all times relevant to this complaint had a seating capacity for approximately 24 people.

128. Plaintiff has been physically present in that room. Based on information and belief, the immigration judge running that hearing was J. Dan Pelletier. Based on information and belief, it would be impossible for Pelletier, reciting his script from a dais in an Atlanta court room and observing the Lumpkin

hearing room via televideo, to have visually discerned individual respondents, much less engage each of them in any meaningful exchange.

129. Mass hearings of any sort are not consistent with judicial procedures.

130. The IJ Benchbook states that "A great deal of efficiency is gained if the immigration judge can coordinate with the Government detention officers to screen the detainees to determine which among them are contesting their cases and which are not."

131. The officials who work for an agency that, pursuant to agency policy, are relying for their decisions on officers of an arresting law enforcement agency accurately ascertaining the assent to deportation among those in their custody are not acting in a judicial capacity. Plaintiff alleges that these policies and practices enumerated in points 117-131 are evidence of an agency that is not judicial – and not that these are "bad judges" -- and thus does not by procedure or practice qualify for the sovereign immunity traditionally reserved for judges or those acting in a judicial capacity.

132. Defendant Cassidy had no authority over the actions of guards under contract to the DHS and therefore acted outside his bounds of discretionary authority.

133. Defendant Summers had fair warning that the immigration courts

were part of the DOJ, not the DHS and thus was responsible for training his subordinates on the procedures consistent with the division of authority between these two agencies. Defendant Summers's demonstrable disrespect for the laws and regulations governing observers' access to immigration courts, directly caused the harms Plaintiff endured at the hands of Defendants Cassidy, FPS Inspector DOE and Paragon DOES 1-3.

134. Plaintiff was unlawfully and maliciously detained and deprived of her personal liberty by the Defendant Paragon System Inc.'s security guards, which constitutes false imprisonment, a seizure in violation of her Fourth Amendment constitutional rights.

135. Plaintiff was maliciously threatened with handcuffs and force and pushed in the back by the Defendant Paragon System Inc.'s security guards.

136. The Defendants actions of false imprisonment, assault and battery, amounted to a "seizure," a violation of her Fourth Amendment constitutional rights.

137. At no time did the Plaintiff conduct herself or behave in such a manner as to cause a person of reasonable prudence to believe that the Plaintiff had violated any laws or regulations.

138. The manner of prohibiting Plaintiff to have access to the courtroom

observation and the unlawful detention, assault, and battery in violation of Plaintiff's constitutional rights actually and proximately caused her damages.

139. As a result of the foregoing, Plaintiff has been hindered in her professional and journalistic research on immigration courts in Georgia though the Defendants' violations of Plaintiff's constitutional right of access to the courts.

140. The Plaintiff as a member of the public and the press has a constitutional right of access to and information about governmental proceedings and such proceedings are presumptively open. The right of public access to these proceedings is protected by the Constitution:

> The Executive Branch seeks to uproot people's lives, outside the public eye, and behind a closed door. Democracies die behind closed doors. The First Amendment, through a free press, protects the people's right to know that their government acts fairly, lawfully, and accurately in deportation proceedings. When government begins closing doors, it selectively controls information rightfully belonging to the people. Selective information is misinformation. The Framers of the First Amendment "did not trust any government to separate the true from the false for us." Kleindienst v. Mandel, 408 U.S. 753, 773, 33 L. Ed. 2d 683, 92 S. Ct. 2576 (1972) (quoting Thomas v. Collins, 323 U.S. 516, 545, 89 L. Ed. 430, 65 S. Ct. 315 (Jackson, J., concurring)). They protected the people against secret government. From *Detroit Free Press v. Ashcroft*, 303 F.3d 681 (6th Cir. 2002)

141. E-mail among the top officials at the EOIR, including those named in this complaint, expresses repeated dismay and even derision about Stevens's persistence in attempting to observe immigration hearings and references a

meeting or meetings convened on or about April, 2010 to discussing "banning" Plaintiff from hearings. This email is among the same officials who obstructed justice instead of adequately investigating her misconduct complaints of April 27, 2010, November 20, 2010 and December 6, 2010 submitted or referred to the EOIR as well as the DOJ Office of the Inspector General (OIG) and the Office of Professional Responsibility.

142. On June 3, 2010 Plaintiff received a response to her April 27, 2010 complaint about the events of April 19, 2010 containing information that was demonstrably inaccurate and did nothing to alleviate the harms perpetrated by Defendants Cassidy,Keller, Smith, Mooney and Long.

143. Unsigned correspondence to Plaintiff from the OIG indicates that the complaint stemming from the events of October 7, 2009 was referred to the EOIR Office of General Counsel on April 21, 2011.

144. Unsigned correspondence to Plaintiff from the OIG about a complaint about the obstruction of justice and policies limiting media access to immigration courts under the direction of EOIR public affairs officer Lauren Alder Reid, submitted December 6, 2010 indicates that this complaint was referred to to the EOIR OGC on April 27, 2011.

145. According to a voice mail message from an EOIR employee conveyed

on or about March 29, 2012, neither of these referrals has been investigated.

146. Plaintiff has exhausted administrative remedies for addressing the conspiracy to prevent her access to the immigration courts in Georgia.

COUNT ONE: CONSTITUTIONAL VIOLATION *(Solely pled against Defendant Cassidy in his individual capacity and Paragon System Inc.'s Security Guards Defendant Does 1-3 in their individual capacity)*

147. Plaintiff re-alleges and incorporates herein the allegations of each preceding paragraph.

148. Defendants' conduct in seizing the Plaintiff and preventing her access to the immigration courtrooms violated the rights of the Plaintiff as guaranteed by the First, Fourth, and Fifth Amendment rights as established in the U.S. Constitution. The articulated reasons for prohibiting Plaintiff from observing Judge Cassidy's court and seizing her were based on pretext and conducted in an effort to prevent her from having access to observe Defendant Cassidy's courtroom. Without access to observe Defendant Cassidy's or other hearings, Plaintiff's ability to write articles exposing their unlawful actions has been hindered.

WHEREFORE Plaintiff requests that she be granted the following relief:

A. A declaratory judgment stating that Plaintiff must be granted open access

to the immigration hearings in Defendant Cassidy's court in compliance with the law.

B. That she be awarded damages, consequential, general, special, and punitive, from the Defendants in their individual capacity.

C. An award of Plaintiff's costs and attorney fees related to this action.

D. Any further relief that the Court deems just.

COUNT TWO: PRELIMINARY AND PERMANENT INJUNCTION

(against all Defendants)

149. Plaintiffs re-allege and incorporate herein the allegations of each preceding paragraph.

150. Allowing Defendant Cassidy to continue closed secret proceedings by prohibiting Plaintiff or other members of the public or press in violation of constitutional rights will cause irreparable harm to the Plaintiff, to the public, and to our democratic society. Closed proceedings impair Plaintiff's, the public's and the press's ability to observe, gather or report the news and otherwise exercise the First amendment and due process constitutional right of access to immigration hearings.

151. The rights the Plaintiff seeks to exercise are fundamental to our free society and democratic form of government. Plaintiff and other members of the

public or press are being prohibited from observing immigration court proceedings on grounds of pretext in direct violation of constitutional rights.

WHEREFORE Plaintiff requests that she be granted the following relief:

A. A preliminary and permanent injunction granting Plaintiff, the public, and the press open access to the immigration hearings in Judge Cassidy's court in compliance with the law.

B. An award of Plaintiff's costs and fees related to this action.

C. Any further relief that the Court deems just.

WHEREFORE, PLAINTIFF PRAYS FOR THE FOLLOWING:

1. That she be awarded damages, consequential, general, special, and punitive where she is legally entitled to them.

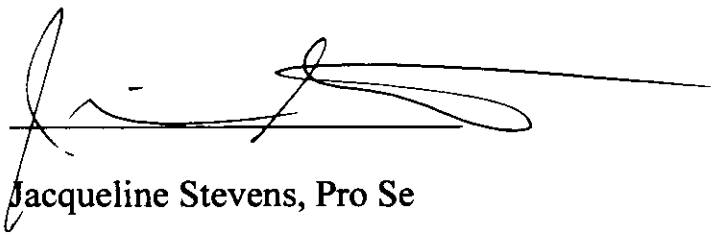
2. That this Court award injunctive relief and declaratory judgment where she is legally entitled to that;

3. That she have a jury trial upon the issues herein presented;

4. That she be awarded her costs for this action; and,

5. That she be awarded such other and further relief which this Court deems just and proper.

This is the 17 day of April, 2012.



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