

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

Beata Mariana de Jesus Mejia-Mejia,)
)
Petitioner-Plaintiff,)

v.)

Case No. _____

)
U.S. Immigration and Customs)
Enforcement ("ICE"); U.S. Department of)
Homeland Security ("DHS"); U.S.)
Customs and Border Protection ("CBP");)
U.S. Citizenship and Immigration)
Services ("USCIS"); U.S. Department of)
Health and Human Services ("HHS");)
Office of Refugee Resettlement ("ORR");)
Thomas Homan, Acting Director of ICE;)
Henry Lucero, Phoenix Field Office)
Director, ICE; Michael Zackowski,)
Phoenix Assistant Field Office)
Director, ICE; Kirstjen Nielsen, Secretary of)
DHS; Jefferson Beauregard Sessions III,)
Attorney General of the United States;)
L. Francis Cissna, Director of USCIS;)
Kevin K. McAleenan, Acting)
Commissioner of CBP; William K. Brooks,)
Tucson Field Director, CBP; Alex Azar,)
Secretary of the Department of Health and)
Human Services; Scott Lloyd, Director of)
the Office of Refugee Resettlement,)
)

Respondents-Defendants.

**PETITION FOR HABEAS CORPUS AND COMPLAINT FOR
DECLARATORY, INJUNCTIVE, AND MONETARY RELIEF**

NOW COMES Beata Mariana de Jesus Mejia-Mejia ("Ms. M."), by and
through counsel, and files this petition for habeas corpus and civil action against

the Trump administration to vindicate her substantive and procedural due process rights under the Fifth Amendment of the U.S. Constitution and her rights under the International Convention on Civil and Political Rights, the United Nations Convention Relating to Status of Refugees, 8 U.S.C. § 1158, and the International Child Abduction Convention. In support, Plaintiff states as follows:

INTRODUCTION

1.

This case challenges the United States government's forcible separation of a parent from her young child for no legitimate reason and notwithstanding the threat of irreparable psychological damage that separation has been universally recognized to cause young children. Ms. M. is the mother of a seven (7) year-old son who was inexplicably ripped away from her and then sent to another facility to be detained alone. President Donald Trump's Chief of Staff, John Kelly, when he was Secretary of Homeland Security, stated that separating children from families crossing the U.S. border would be an effective "deterrent" to those considering coming to the United States. At present, this "deterrent" is being used against all families, *including families seeking asylum*, despite the administration's denials, deflections, and semantics. The administration's attempts at obscuring of this blatantly unconscionable practice within its own

borders begs this Court give pause to reflect on history and the evils this nation has fought to defeat.

2.

Ms. M. brings this action to have the government reunite her with her young child, D.M., from whom she has been separated now for more nearly one month. Ms. M. was released on bond after seeking asylum, but her son remains in custody and Ms. M. does not even know where her son is. As of this time, the government has forcibly separated *thousands* of other parents from their children and continues to separate them. Like Ms. M., almost all these individuals have fled persecution and are seeking asylum in the United States. Without any assertions of abuse, neglect, or parental unfitness, and with no hearings of any kind, the government is detaining these young children, alone and frightened, in facilities often thousands of miles from their parents.

3.

Forced separation from parents causes severe trauma to young children, especially those who are already traumatized and are fleeing persecution in their home countries. The resulting cognitive and emotional damage can be permanent. The Trump Administration knows this, but it continues to enforce this separation policy and lashes out defensively when admonished for the policy, be it by the United Nations, allied nations, the president of the American

Academy of Pediatrics, or a petition of over 7,600 mental health professionals and 142 organizations.

4.

Defendants have ample ways to keep Plaintiff together with her child. There are shelters that house families (including asylum-seekers) while they await the final adjudication of their immigration cases. If, however, the government feels compelled to continue detaining these parents and young children, it should at a minimum detain them together in one of its immigration family detention centers.

5.

As Defendants well know, the Due Process Clause of the Fifth Amendment does not permit the federal government to forcibly take young children from their parents without justification or even a hearing.

JURISDICTION

6.

This case arises under the Fifth Amendment to the United States Constitution. The court has jurisdiction under 28 U.S.C. § 1331 (federal question jurisdiction); 28 U.S.C. § 2241 (habeas jurisdiction); and Art. I., § 9, cl. 2 of the United States Constitution (“Suspension Clause”). Plaintiff’s child in custody for purposes of habeas jurisdiction.

VENUE

7.

Venue is proper under 28 U.S.C. § 1391 because at least one of the Defendants is subject to personal jurisdiction in this district with regards to this action.

PARTIES

8.

Plaintiff Ms. M. is a citizen of Guatemala and was born in 1979. She is the mother of 7-year-old “D.M.”

9.

Defendant U.S. Immigration and Customs Enforcement (“ICE”) is the sub-agency of DHS that is responsible for carrying out removal orders and overseeing immigration detention.

10.

Defendants U.S. Department of Homeland Security (“DHS”) has responsibility for enforcing the immigration laws of the United States.

11.

Defendant U.S. Customs and Border Protection (“CBP”) is the sub-agency of DHS that is responsible for the initial processing and detention of noncitizens who are apprehended near the U.S. border.

12.

Defendant U.S. Citizenship and Immigration Services (“USCIS”) is the sub-agency of DHS that, through its Asylum Officers, conducts interviews of certain individuals apprehended at the border to determine whether they have a credible fear of persecution and should be permitted to apply for asylum.

13.

Defendant U.S. Department of Health and Human Services (HHS) is a department of the executive branch of the U.S. government which has been delegated with authority over “unaccompanied” noncitizen children.

14.

Defendant Office of Refugee Resettlement (“ORR”) is the component of HHS which provides care of and placement for “unaccompanied” noncitizen children.

15.

Defendant Thomas Homan is sued in his individual capacity and his official capacity as the Director of ICE, was a legal custodian of Plaintiff at the time of separation, and is a custodian of Plaintiff’s son D.M.

16.

Defendant Henry Lucero is sued in his official capacity as the ICE Phoenix Field Office Director, was a legal custodian of Plaintiff at the time of separation, and is a custodian of Plaintiff's son D.M.

17.

Defendant Michael Zackowski is sued in his official capacity as the ICE Phoenix Assistant Field Office Director for the Eloy Detention Facility, was a legal custodian of Plaintiff at the time of separation, and is a custodian of Plaintiff's son D.M.

18.

Defendant Kirstjen Nielsen, is sued in her individual capacity and official capacity as the Secretary of the Department of Homeland Security. In this capacity, she directs each of the component agencies within DHS: ICE, USCIS, and CBP. As a result, Respondent Nielsen has responsibility for the administration of the immigration laws pursuant to 8 U.S.C. § 1103, is empowered to grant asylum or other relief, was a legal custodian of Plaintiff at the time of separation, and is a custodian of Plaintiff's son D.M.

19.

Defendant Jefferson Beauregard Sessions III is sued in his individual capacity and his official capacity as the Attorney General of the United States. At

all times relevant to this Complaint, he had responsibility for the administration of the immigration laws pursuant to 8 U.S.C. § 1103, oversaw the Executive Office of Immigration Review, was empowered to grant asylum or other relief, was a legal custodian of Plaintiff at the time of separation, and is a custodian of Plaintiff's son D.M. At all times relevant to this Complaint, he had the power to direct his subordinates to carry out any order directed to him to separate children from parents seeking asylum and to produce or release the petitioner's child.

20.

Defendant L. Francis Cissna is sued in his individual and official capacity as the Director of USCIS.

21.

Defendant Kevin K. McAleenan is sued in his individual and official capacity as the Acting Commissioner of CBP.

22.

Defendant William K. Brooks is sued in his individual and official capacity as the Tucson Field Director of CBP.

23.

Defendant Alex Azar is sued in his individual capacity and his official capacity as the Secretary of the Department of Health and Human Services.

24.

Defendant Scott Lloyd is sued in his individual capacity and his official capacity as the Director of the Office of Refugee Resettlement.

RELEVANT FACTS

a. “Zero Tolerance” and the Trump Administration’s separation of parents from their young children

25.

Over the past year, the federal government has separated hundreds of migrant families for no legitimate purpose.

26.

Almost all of these migrant families fled persecution and are seeking asylum. Although there are no allegations that the parents are unfit or abusing their children in any way, the government has forcibly separated them from their young children and detained the children, often far away, in facilities for “unaccompanied” minors.

27.

There is overwhelming medical evidence that the separation of a young child from his or her parent will have a devastating negative impact on the child’s well-being, especially where there are other traumatic factors at work, and that this damage can be permanent.

28.

The American Association of Pediatrics has recently denounced the Administration's practice of separating migrant children from their parents, noting that: "The psychological distress, anxiety, and depression associated with separation from a parent would follow the children well after the immediate period of separation – even after the eventual reunification with a parent or other family."

29.

Such a situation could have long-term, devastating effects on young children, who are likely to develop what is called toxic stress in their brain once separated from caregivers or parents they trusted. This disrupts a child's brain development and increases the levels of fight-or-flight hormones in their bodies; and this kind of emotional trauma could eventually lead to health problems, such as heart disease and substance abuse disorders.

30.

As of the date of filing Ms. M's Complaint, over 7,600 mental health professionals and 142 organizations have signed a petition urging President Trump, Attorney General Jeff Sessions and several elected officials to stop the policy of separating children from their parents. The petition says:

These children are thrust into detention centers often without an advocate or an attorney and possibly even without the presence of

any adult who can speak their language. **We want you to imagine for a moment what this might be like for a child: to flee the place you have called your home because it is not safe to stay and then embark on a dangerous journey to an unknown destination, only to be ripped apart from your sole sense of security with no understanding of what just happened to you or if you will ever see your family again.** And that the only thing you have done to deserve this, is to do what children do: stay close to the adults in their lives for security.

31.

That petition further says:

To pretend that separated children do not grow up with the shrapnel of this traumatic experience embedded in their minds is **to disregard everything we know about child development, the brain, and trauma.**

32.

Prior Administrations detained migrant families but did not have a practice of forcibly separating fit parents from their young children.

33.

According to reports, the government may soon adopt a formal national policy of separating migrant families and placing the children in government facilities for unaccompanied minors.

34.

In effect, the Trump Administration adopted this child-separation policy in April 2018 when Defendant Sessions announced a “Zero Tolerance” policy for all families that cross the Southwest border, specifically directing U.S. Attorneys

Offices of Southern District of California, District of Arizona, District of New Mexico, Western District of Texas, and the Southern District of Texas to criminally prosecute all Department of Homeland Security referrals of section 1325(a) violations. As a result, when the parents are jailed for the formerly administrative – *now criminal* – offense of crossing the border, the children – be they infants, toddlers, pre-teens, or young teenagers – are separated from the parents and placed in HHS custody.

35.

Nearly 2,000 *immigrant children* were separated from parents during six weeks in April and May, according to the Department of Homeland Security.

36.

On Monday, June 18, 2018, the United Nations' top human rights official entered the mounting furor over the Trump administration's policy of separating undocumented immigrant children from their parents, calling for an immediate halt to a practice he condemned as abuse. On that same day, the president of the American Academy of Pediatrics called the practice "child abuse."

37.

There are non-governmental shelters that specialize in housing and caring for families – including asylum seeking families – while their immigration applications are adjudicated. There are also government-operated family

detention centers where parents can be housed together with their children, should the government decide not to release them.

38.

On information and belief, the intent of Defendants Sessions and Nielsen is to use the de-facto child separation policy as a bargaining chip to get funding to build a “wall” on the southern border and overhaul immigration laws.

b. Ms. M. and her seven-year old son D.M. are separated after seeking asylum

39.

Ms. M. and her son D.M. are one of the many families that have recently been separated by the government.

40.

Ms. M. and her son are seeking asylum in the United States.

41.

Ms. M. and her son crossed the U.S. border near San Luis, Arizona on approximately May 19, 2018.

42.

They were immediately approached by border agents, and although their native language is Spanish, they were able to communicate to the border guards that they sought the storied protection of the U.S. government based on the severe violence and threats of death that she was experiencing in Guatemala,

including violence and threats of death from her husband toward both Ms. M. and her son, D.M.

43.

Ms. M. and her son D.M. were placed in a holding cell by border agents. Approximately two days later, in the middle of May, immigration officials forcibly separated 7-year-old D.M. from his mother. Men dressed in green uniforms (border agents) told Ms. M. they needed to take her son and would not tell her why. Ms. M. said “no” and demanded an explanation, but they would not tell her why they needed to take her seven-year-old son, and they took him anyway.

44.

The border agents did not tell Ms. M. where they were taking her son.

45.

When D.M. was taken away from his mother, he was screaming and crying and did not want to be taken away from his mother. That was the last time Ms. M. saw her son.

46.

Ms. M. was subsequently transferred to Eloy Detention Center. At Eloy, she spoke to an officer who was able to find out that her son was in Phoenix, AZ, but could not give her any more information.

47.

Ms. M. has not been given any paperwork to indicate where her son is or what his status or health condition is.

48.

On information and belief, D.M. was housed in a detention facility for “unaccompanied” minors run by the Office of Refugee Resettlement (ORR).

49.

Based on her expression of a fear of returning to Guatemala, Ms. M. was referred for an initial screening before an asylum officer, called a “credible fear interview.” She subsequently passed the credible fear screening, and until June 15, 2018, remained detained in the Eloy Detention Center in the Eloy, Arizona area.

50.

On information and belief, Ms. M. asserted asylum after being detained by border patrol and subsequently passed her credible fear interview, and she was never indicted for illegal entry into the U.S.

51.

The day after her credible fear interview, she was permitted to speak to her son on the phone (no video).

52.

During the one time Ms. M. was able to speak to her son on the phone, her son was crying and scared. An official facilitating the call, who was with D.M., told Ms. M. that her son was “fine,” but Ms. M. could clearly hear her son saying “Mama! Mama! Mama!” in a distressed voice over and over and over again.

53.

Ms. M. and her son have been separated now for approximately four weeks.

54.

For four weeks – so far – Ms. M. has been terrified that she would never see her son again.

55.

On information and belief, seven-year-old D.M. is alone in a facility in Phoenix, AZ.

56.

D.M. is scared and misses his mother and wants to be reunited with her as soon as possible.

57.

Every day that D.M. is separated from his mother causes him greater emotional and psychological harm and could potentially lead to permanent emotional trauma.

58.

Ms. M. is distraught and depressed because of the separation from her son. In detention, she did not eat properly, lost weight, and was not sleeping due to worry and nightmares.

59.

The government has no legitimate interest in separating Ms. M. and her child.

60.

There has been no evidence, or even accusation, that D.M. was abused or neglected by Ms. M.

61.

There is no evidence that Ms. M. is an unfit parent or that she is not acting in the best interests of her child.

62.

Defendants released Ms. M. from custody on June 15, 2018 after posting bond with the help of Libre by Nexus. But despite being lawfully released on

bond, Defendants have not reunited her with her son, who remains detained at an ORR facility.

63.

After being released, Ms. M. has repeatedly tried calling the number that she was connected to the single time she spoke to her son, but no one will answer the phone.

64.

Ms. M. fears direly for her son's safety and wellbeing every moment of every day that passes.

CAUSES OF ACTION

COUNT I

Substantive Due Process

Violation of 5th Amendment of the U.S. Constitution under 42 U.S.C. § 1983
(Claim for Injunctive and Declaratory Relief against all Defendants in their official capacities)

65.

All of the foregoing allegations are repeated and realleged as though fully set forth herein.

66.

The Due Process Clause of the Fifth Amendment applies to all "persons" on United States soil and thus applies to Ms. M. and her son.

67.

Ms. M. and her son have a liberty interest under the Due Process Clause in remaining together as a family.

68.

The separation of the Ms. M. from her son violates substantive due process because it furthers no legitimate purpose, not to mention a compelling governmental interest.

69.

The separation of the Ms. M. from her son violates substantive due process because it shocks the conscience to forcibly separate children from their parents, let alone without any explanation to the child or the parent. It also shocks the conscience to induce trauma on innocent young children like Ms. M.'s son who have done nothing wrong – with potential long-term effects on their developing brains. It also shocks the conscience to intentionally enforce a policy of family separations, knowing that they will be so traumatic that the policy will deter people from seeking asylum in the United States out of fear for their children's safety and bodily integrity. It even further shocks the conscience that these Defendants would continue this policy despite outcry from thousands of mental health professionals, pediatricians, organizations, and the United Nations citing the severe psychological trauma that causes serious, life-altering developmental

and behavioral complications. And it further shocks the conscience that this would be done as a bargaining chip for Congress to pass a bill funding a “wall” to fulfill an ill-conceived campaign promise at the expense of the lives of innocent children and their shell-shocked parents seeking asylum in the United States.

COUNT II

Substantive Due Process: Supervisory Liability

Violation of 5th Amendment of the U.S. Constitution under 42 U.S.C. § 1983
(Claim for Damages against Defendants Homan, Nielsen, Sessions, Cissna, McAleenan, Brooks, Azar, and Lloyd in their individual capacities)

70.

All of the foregoing allegations are repeated and realleged as though fully set forth herein.

71.

The Due Process Clause of the Fifth Amendment applies to all “persons” on United States soil and thus applies to Ms. M. and her son.

72.

Ms. M. and her son have a liberty interest under the Due Process Clause in remaining together as a family.

73.

The separation of the Ms. M. from her son violates substantive due process because it furthers no legitimate purpose, not to mention a compelling governmental interest.

74.

The separation of the Ms. M. from her son violates substantive due process because it shocks the conscience to forcibly separate children from their parents, let alone without any explanation to the child or the parent. It also shocks the conscience to induce trauma on innocent young children like Ms. M.'s son who have done nothing wrong – with potential long-term effects on their developing brains. It also shocks the conscience to intentionally enforce a policy of family separations, knowing that they will be so traumatic that the policy will deter people from seeking asylum in the United States out of fear for their children's safety and bodily integrity. It even further shocks the conscience that these Defendants would continue this policy despite outcry from thousands of mental health professionals, pediatricians, organizations, and the United Nations citing the severe psychological trauma that causes serious, life-altering developmental and behavioral complications. And it further shocks the conscience that this would be done as a bargaining chip for Congress to pass a bill funding a "wall" to fulfill an ill-conceived campaign promise at the expense of the lives of

innocent children and their shell-shocked parents seeking asylum in the United States.

75.

Ms. M. has suffered severe mental anguish, pain, and suffering as a result of these Defendants ordering the separation of Ms. M. from her son and enforcing this unconscionable policy.

76.

As a result, Ms. M. is entitled to compensatory damages, to include pain and suffering, as well as costs and fees of this litigation.

COUNT III
Procedural Due Process
Violation of 5th Amendment of the U.S. Constitution under 42 U.S.C. § 1983
(Claim for Injunctive and Declaratory Relief against all Defendants in their official capacities)

77.

All of the foregoing allegations are repeated and realleged as though fully set forth herein.

78.

The Due Process Clause of the Fifth Amendment applies to all “persons” on United States soil and thus applies to Ms. M. and her son.

79.

Ms. M. and her son have a liberty interest under the Due Process Clause in remaining together as a family.

80.

The separation of Ms. M. from her son also violates procedural due process because it was undertaken without any hearing, and Ms. M. was not even given any paperwork to indicate where her son is located or how she can contact him or retrieve him from detention.

COUNT IV

Procedural Due Process

Violation of 5th Amendment of the U.S. Constitution under 42 U.S.C. § 1983
(Claim for Damages against Defendants Homan, Nielsen, Sessions, Cissna, McAleenan, Brooks, Azar, and Lloyd in their individual capacities)

81.

All of the foregoing allegations are repeated and realleged as though fully set forth herein.

82.

The Due Process Clause of the Fifth Amendment applies to all “persons” on United States soil and thus applies to Ms. M. and her son.

83.

Ms. M. and her son have a liberty interest under the Due Process Clause in remaining together as a family.

84.

The separation of Ms. M. from her son also violates procedural due process because it was undertaken without any hearing, and Ms. M. was not even given any paperwork to indicate where her son is located or how she can contact him or retrieve him from detention.

85.

Ms. M. has suffered severe mental anguish, pain, and suffering as a result of these Defendants ordering the separation of Ms. M. from her son and enforcing this unconscionable policy.

86.

As a result, Ms. M. is entitled to compensatory damages, to include pain and suffering, as well as costs and fees of this litigation.

COUNT V

Petition for Habeas Corpus under Treaties of the United States: International Convention on Civil and Political Rights

(Claim for Injunctive and Declaratory Relief against all Defendants in their official capacities)

87.

All of the foregoing allegations are repeated and realleged as though fully set forth herein.

88.

The ICCPR has been signed and ratified by the United States.

89.

Under Article 17 of the ICCPR “[n]o one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence, nor to unlawful attacks on his honour and reputation.” Article 23 states that “family is the natural and fundamental group unit of society and is entitled to protection by society and the State.”

90.

By forcibly separating Ms. M. from her son, Plaintiff has been subjected to arbitrary, unlawful, and unjustified interference with her family in violation of the ICCPR.

COUNT VI

**Petition for Habeas Corpus under Laws and Treaties of the United States:
United Nations Convention Relating to Status of Refugees and 8 U.S.C. § 1158**
(Claim for Injunctive and Declaratory Relief against all Defendants in their official capacities)

91.

All of the foregoing allegations are repeated and realleged as though fully set forth herein.

92.

The U.S. is party to 1967 Protocol Relating to the Status of Refugees and key provisions have been incorporated into U.S. law giving individuals a cause for action for litigation. Under U.S. federal law “any alien who is physically

present in the United States or who arrives in the United States (whether or not at a designated port of arrival and including an alien who is brought to the United States after having been interdicted in international or United States waters), irrespective of such alien's status, may apply for asylum..." 8 U.S.C. § 1158.

93.

Because the right to seek asylum and the definition of refugee, which stems from an international treaty, is directly incorporated into U.S. law, it creates a legal cause for action for Ms. M.

94.

By interfering with Ms. M.'s parental rights to be with her seven-year-old son, these Defendants have unlawfully interfered with her right to seek asylum with her son and punished her for doing so by ripping her son away from her after seeking asylum.

COUNT VII

Petition for Habeas Corpus under Treaties of the United States: International Child Abduction Convention (ICAC)

(Claim for Injunctive and Declaratory Relief against all Defendants in their official capacities)

95.

All of the foregoing allegations are repeated and realleged as though fully set forth herein.

96.

The ICAC provides that the removal or retention of a child is "wrongful" whenever:

- a. It is in breach of rights of custody attributed to a person, an institution or any other body, either jointly or alone, under the law of the State in which the child was habitually resident immediately before the removal or retention; and
- b. at the time of removal or retention those rights were actually exercised, either jointly or alone, or would have been so exercised but for the removal or retention." These rights of custody may arise by operation of law or by reason of a judicial or administrative decision, or by reason of an agreement having legal effect under the law of the country of habitual residence.

97.

The Trump Administration and these Defendants have in effect abducted Ms. M.'s son from her lawful custody and has not given her any information on his whereabouts or his condition.

COUNT VIII

Violation of the International Child Abduction Remedies Act (ICARA) *(Claim for Injunctive Relief against all Defendants in their official capacities)*

98.

All of the foregoing allegations are repeated and realleged as though fully set forth herein.

99.

The ICAC provides that the removal or retention of a child is "wrongful" whenever:

- a. It is in breach of rights of custody attributed to a person, an institution or any other body, either jointly or alone, under the law of the State in which the child was habitually resident immediately before the removal or retention; and
- b. at the time of removal or retention those rights were actually exercised, either jointly or alone, or would have been so exercised but for the removal or retention." These rights of custody may arise by operation of law or by reason of a judicial or administrative decision, or by reason of an agreement having legal effect under the law of the country of habitual residence.

100.

The ICARA is the implementing legislation for the ICAC, creating a private right of action for claimants.

101.

The Trump Administration and these Defendants have in effect abducted Ms. M.'s son from her lawful custody and has not given her any information on his whereabouts or his condition.

**COUNT IX
PUNITIVE DAMAGES**

(Against Defendants Homan, Nielsen, Sessions, Cissna, McAleenan, Brooks, Azar, and Lloyd in their individual capacities)

Based on the foregoing, Plaintiff is entitled to punitive damages because these Defendants acted with a willful indifference to the laws that protect Ms. M. and her son's constitutional rights. Actually, these Defendants have played with their lives.

**COUNT X
ATTORNEYS' FEES**

Based on the foregoing, Plaintiff is entitled to attorneys' fees under all applicable laws.

PRAYER FOR RELIEF

Petitioner-Plaintiff requests that the Court enter a judgment against Respondents-Defendants and award the following relief:

- A. Declare unlawful the separation of Ms. M. from her son, immigrants seeking asylum and protection in the country;
- B. Preliminarily and permanently enjoin and restrain Defendants from continuing to separate Ms. M. from her son;
- C. Order Defendants to release Ms. M.'s son into his mother's custody;
- D. Enjoin Defendants from removing Ms. M. from the country until she is reunited with her son, in the event that Ms. M. is not permitted to remain in the United States;
- E. Enter judgment in favor of Plaintiff;
- F. Award compensatory damages to Plaintiff, including pain and suffering arising from the separation between Ms. M. and her son,
- G. Award punitive damages for the conscious disregard for Plaintiff's rights;
- H. Require Defendants to pay reasonable attorneys' fees and costs;

I. Order all other relief that is just and proper.

Respectfully submitted this 19th day of June 2018,

/s/John M. Shoreman
John M. Shoreman (#407626)

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