

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

**ISABEL ZELAYA, GERONIMO
GUERRERO, CAROLINA ROMULO
MENDOZA, LUIS BAUTISTA
MARTÍNEZ, MARTHA PULIDO,
CATARINO ZAPOTE HERNÁNDEZ, and
MARIA DEL PILAR GONZALEZ CRUZ,**
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

JERE MILES, Special Agent in Charge,
Homeland Security Inve

INTRODUCTION

1. In April 2018, officers from U.S. Immigration and Customs Enforcement (“ICE”), Homeland Security Operations (“HSI”), Enforcement and Removal Operations (“ERO”),¹ and the Tennessee Highway Patrol (“THP”) descended on the Southeastern Provision meatpacking plant (“Plant”) in Bean Station, Tennessee, a small town in the far eastern corner of the state. Heavily armed, the officers formed a perimeter around the plant and blocked every exit. They used official vehicles to seal off the one public road to the Plant. Law enforcement helicopters flew above the Plant, securing and surveilling the premises. In the Plant’s parking lot, several vans and large bags of plastic “zip tie” handcuffs waited to be used. Moments later, dozens of armed officers in bullet-proof vests rushed into the Plant. They quickly fanned out, many with their firearms drawn, and screamed at the workers inside to stop moving. The workers, terrified and confused, feared the commotion was a terrorist attack, a mass shooting, or a fire.

2. oriersrrenfeltiore.Rad tr,ed

search warrant for documents in hand, the officers executed the largest workplace immigration raid in nearly a decade. They forcefully seized and arrested approximately 100 Latino workers. In the process, the officers beat the workers with racial slurs, punched one worker in the face, and shoved firearms in the faces of many others. Meanwhile, the officers did not detain the Plant's white workers or subject them to the same intrusive and aggressive treatment and prolonged detention that the Latino workers experienced.

4. Many of the Latino workers were long-term employees of the Plant who had spent years performing the dangerous work endemic to slaughterhouses, often in unsafe conditions and

made arrests without a valid arrest warrant, ~~not~~ because that each worker had violated U.S. immigration or criminal laws, ~~on~~ any exigent circumstances. ~~in~~ executing some of these arrests, the federal officers used ~~at~~ brutal and excessive ~~for~~ force without any provocation.

7.

12. Plaintiff Geronimo Guerrero

19. Defendant Robert Hammer (“Defendant Hammer”) was at all times relevant to this action an Assistant Special Agent in Charge with the FBI. He oversaw the Southeastern Provision raid. Defendant Hammer is sued in his individual capacity.

20. Defendant David Vicente (“Defendant Vicente”) was at all times relevant to this action an Agent of ICE ERO Knoxville. He participated in the planning and execution of the Southeastern Provision raid. Defendant Vicente is sued in his individual capacity.

21. Defendant Francisco Ayala (“Defendant Ayala”) was at all times relevant to this action an Agent of ICE ERO. He participated in the planning and execution of the Southeastern Provision raid. Defendant Ayala is sued in his individual capacity.

22. Defendant Billy Riggins (“Defendant Riggins”) was at all times relevant to this action a Special Agent of ICE. He participated in the planning and execution of the Southeastern Provision raid. Defendant Riggins is sued in his individual capacity.

23. Defendant William Hinkle (“Defendant Hinkle”) was at all times relevant to this action a Deportation Officer of ICE. He participated in the planning and execution of the Southeastern Provision raid. Defendant Hinkle is sued in his individual capacity.

24. Defendant Anthony Martin (“Defendant Martin”) was at all times relevant to this action a Deportation Officer of ICE. He participated in the planning and execution of the Southeastern Provision raid. Defendant Martin is sued in his individual capacity.

25. Defendant M. Grooms (“Defendant Grooms”) was at all times relevant to this action a Deportation Officer of ICE. He participated in the planning and execution of the Southeastern Provision raid. Defendant Grooms is sued in his individual capacity.

26. Defendant Scott Pa (“Defendant Pa”) was at all times relevant to this action a Special Agent of ICE. He participated in the planning and execution of the Southeastern Provision raid. Defendant Pa is sued in his individual capacity.

27. The identities and capacities of Defendants 1 through 30 are presently unknown to Plaintiffs, and on this basis, they sue these defendants by fictitious names. Plaintiffs will amend the Complaint to substitute the true names and capacities of the Doe Defendants when they are ascertained. Plaintiffs are informed, believe, and do believe that Does 1 through 30 are, and were at all times relevant to this action, employees and/or agents of ICE, HSI, and/or ERO and are responsible for the acts and omissions complained of herein including, but not limited to, their unlawful seizure and arrest, and violation of their Fourth and Fifth Amendment rights.

CLASS ACTION ALLEGATIONS

28. Plaintiffs Maria del Pilar Gonzalez Cruz and Catarino Zapote Hernández (“Class Representative Plaintiffs”) seek to bring this class action against the Defendants on behalf of themselves and all other similarly situated Latino workers in the Plant on April 5, 2018 who were targeted by the Defendants’ conspiracy to detain every worker in the Plant solely on the basis of their actual or apparent Latino race or ethnicity.

29. The Class Representative Plaintiffs seek to bring as a class action the claim set forth in Count I (“Equal Protection Class Claim”) under Federal Rules of Civil Procedure 23(a) and (b)(3), for their requests for damages. This action satisfies the numerosity, commonality, typicality, adequacy, predominance, and superiority requirements of those provisions.

30. Plaintiffs Gonzalez Cruz and Zapote Hernández seek to certify the following Class:

All individuals who are or appeared to be of Latino race or ethnicity who were working at the Plant the morning of April 5, 2018.

31. The Class Representative Plaintiffs' proposed Class meets the prerequisites of Rule 23(a):

1. Numerosity: The Class is so numerous that joinder of all members is impracticable. The Class Representative Plaintiffs believe that the Class consists of approximately 100 individuals. Membership in the Class is readily ascertainable from Defendants' arrest records from the day of the raid and Defendants' public statements regarding the raid.⁴

2. Commonality: There are numerous questions of law or fact common to the Class, and those issues predominate over questions affecting only individual Class Members. The common legal and factual issues include, but are not limited to, the following:

(a) Whether the Defendants' conduct set out in paragraphs 48-100 and Count I violated the Fifth Amendment to the U.S. Constitution.

(b) Whether the Defendants conspired to violate the rights of the Class under the equal protection component of the Due Process Clause of the Fifth Amendment to the U.S.

Constitution. DocId:32000000-0000-0000-0000-000000000000-2.295 TD .001 Tc 0 Tw ((b))Tj /TT7 1 Tf 1.165 0 TD 0

(d)

6. Superiority: The Class Representative Plaintiffs and Class Members have all suffered damages as a result of Defendants' wrongful conduct. A class action is

37. Inside the Plant there are three offices, a break room, bathrooms, several large freezer sections, a processing area, and a “kill floor.” Some of the areas are separated by solid doors or walls, but rather are completely open or separated by clear, heavy curtains.

38. The workers stored personal items in the break area and would receive their uniforms there at the beginning of their shift.

39. The processing area was one of two main work areas in the Plant. In the processing area, workers prepared and packaged cuts of meat to be distributed for sale.

40. Approximately fifty workers were working in the processing area on April 5, 2018.

41. The second main work area at the Plant was the “kill floor,” which is where workers butchered and cut apart the cows to be processed into meat.

42. Approximately forty workers were working on the “kill floor” on April 5, 2018.

43. The Plant’s physical and electronic documents were stored in offices and a locked storage room in the Plant. They are not accessible to the workers employed on the processing and kill floor areas.

44. Most people working at the Plant arrived on-site before 7 a.m. each day, five or six days each week, to put on their uniforms and “clock-in” before the morning shift began at 7 a.m.

45.

The Internal Revenue Service Search Warrant

48. The federal investigation into the Plant ~~begs~~ an investigation by the IRS into the owner of the plant, Mr. James Brantley (“~~Brley~~”), related to various alleged tax and immigration law violations.

49. As part of that investigation, the IRS obtained a search ~~warr~~ authorizing the search for and seizure of an enumerated list of items. ~~See~~ re the Search of: 1617 Helton Road, Bean Station, TN 37708 E.D. Tenn. Apr. 2, 2018) (attached hereto as Exhibit 1) (“IRS Search Warrant”); Affidavit in Support of a Search Warrant Attachment B (attached hereto as Exhibit 2).

50. The items to be seized pursuant to the ~~S~~ Search Warrant were, among other things, all “records, documents and materials...related to the financial activities of James Brantley.” Ex. 1, at 5.

51. The IRS Search Warrant did not authorize the ~~re~~ention or arrest of any individual(s).

52. The Affidavit submitted with the IRS Search ~~Warr~~ant relies in part on information from a Confidential Informant (“CI”). The only information provided in the Affidavit about the CI is that he or she was “working with law enforcement.” The Affidavit provides no other indicia of the CI’s reliability. Ex. 2, at 7-10.

53. The Affidavit does not state or imply any ~~pot~~ential safety concerns involved in the execution of the IRS Search Warrant. ~~See~~ generally ~~id.~~

54. The Affidavit states that Plant’s employees are “Hispanic” on five separate occasions. See ~~id~~ at 7-10.

55. The Affidavit notes the CI observed that many of the Plant's workers are "Hispanic," and that the CI believes many are "exploited and without "legal recourse for workplace mistreatment." Id. at 10.

56. The Affidavit states that "personnel" at Brantley's bank said during a tour of the Plant, "they were told [by the owner's wife] that the employees were Hispanic and were paid weekly with cash." Id. at 7.

57. According to the Affidavit, HSI and THP had already been participating in the IRS investigation of Brantley before the search warrant was obtained. Id. at 6.

58. The presence of Defendants at the Plant the morning of April 5 was pursuant to the IRS Search Warrant.

59. The Defendants did not obtain a separate in-home administrative warrant related to their presence and activities at the Plant that day.

The Raid

60. The morning of April 5 began like most other mornings at the Plant.

61. Plaintiffs and Class Members arrived sometime before 7 a.m. to prepare for their shift, which began promptly at 7 a.m.

62. Once the shift began, Plaintiffs and Class Members were all working at their respective stations in the Plant.

63. None of the Plaintiffs or the Class Members worked in the Plant's offices.

64. At around 9 a.m., near the morning break time when the workers were anticipating the opportunity to take a break from their work to attend to personal needs, such as using the restroom, the raid began.

65. Officers from ICE, HSI, and THP formed a perimeter around the plant. Multiple armed agents secured every Plant exit.

66. The THP officers sealed off the one public road to the Plant with official vehicles.

67. THP helicopters surveilled and secured the Plant from above.

68. Dozens of officers from ICE burst, unannounced, into the Plant. They poured through the Plant's multiple doors and quickly fanned out throughout the interior of the Plant.

69. The federal officers wore black uniforms with bullet-proof vests, and they were armed. Some of the officers had their firearms on display or drawn.

70. The federal officers did not wear name tags and did not identify themselves by name to the workers. Most officers did not verbally identify themselves by agency.

71. The federal officers were yelling and loudly ordering the Plaintiffs and the Latino workers to freeze and to stop working.

72. The commotion caused by the federal officers' sudden and forcible entry into the Plant terrorized the Plaintiffs and the Class Members. In the first minutes of the raid, many workers were confused and uncertain about who the officers were or what was the purpose of their presence inside of the Plant.

73. Some federal officers ordered individuals to put their hands in the air.

74. Some federal officers pointed guns at workers while they ordered them to stop working.

75. Individuals who had work equipment on their person were ordered to take off any equipment. Others were ordered to put down any tools they were holding.

76. None of the Latino workers were permitted to continue working.

77. Plaintiffs and the Latino workers were not permitted to use the restroom or otherwise move freely about the Plant as they would have done during break time.

78. The federal officers then ordered the Plaintiffs and the Latino workers to walk from their work station into a line up.

79. Many of the workers were restrained during Plant seizure with plastic zip ties, including Plaintiffs Gonzalez Oz, Zapote Hernández, Zelaya Pulido, Bautista Martínez, and Guerrero. Other workers witnessed the federal agents handcuff their coworkers and were fearful that they too might be handcuffed.

80. After forcing the workers to line up, the federal officers ordered the Plaintiffs and the other Latino workers of the Class to walk outside the Plant and told them to remain in line outside.

81. When they went outside the Plant, Plaintiffs saw that the THP officers had secured the perimeter, the parking lot, and a public road leading to the Plant. Plaintiffs saw and heard two helicopters circling overhead.

82. Some of the THP officers outside stood behind large machine guns which were pointed at the Plant and the workers.

83. Plaintiffs and the Class Members, seeing a number of officers, the firearms, the helicopters, and the police cars, felt terrified.

84. While detained outside the Plant, the workers were not allowed to move freely or talk. When a worker attempted to speak, officers ordered them to shut up.

85. As a result of the actions of the Defendants, Plaintiffs and the Class Members were not free to leave.

86. Under these highly coercive conditions, the Defendants interrogated some of the workers about their immigration status at the Plant.

87. Eventually, Plaintiffs and all the Latino workers were loaded into vans and transported to a National Guard Armory ("Armory") located at 5255 E. Andrew Jackson Highway,

95. The white workers were not restrained and were not handcuffed. They did not have guns

103. Plaintiff Zelaya was terrified by the aggressive treatment of his coworkers he observed. He feared that these two Defendants would point a firearm at him or throw him to the ground as well.

104. The same two Defendants ordered Plaintiff Zelaya to throw his apron and work tools on the ground. He immediately complied.

105. During this time, Plaintiff Zelaya saw the officers point a firearm at his son because he did not take off his tool belt fast enough. Plaintiff Zelaya feared for his son's safety.

106. The same two Defendants then forced him and the other Latino workers in his work area to gather in a central area of the Plant.

107. Plaintiff Zelaya is legally authorized to live and work in the United States.

108. While gathered with the other workers, Plaintiff Zelaya told a Latino ICE officer who spoke Spanish that he had legal status and offered to show him documents as proof. He took out his Employment Authorization Card and handed it to the officer. The ICE officer grabbed the card from him and told him in Spanish that they needed to "investigate" him. The officer then proceeded to handcuff Plaintiff Zelaya.

109. Once gathered, the federal officers, including the Latino officer, walked Plaintiff Zelaya and the other workers outside the Plant.

110. The officers then transported Plaintiff Zelaya in a van to the Armory.

111. The ICE officers at the Armory interrogated Plaintiff Zelaya. Finally, after establishing proof of his legal status, Plaintiff Zelaya was released.

112. Plaintiff Zelaya was detained for approximately two hours.

113. Plaintiff Zelaya was not questioned about his identity, work authorization, or immigration status prior to being detained at the Plant and transported to the Armory. Plaintiff

121. Plaintiff Romulo Mendoza was detained for approximately ten hours.

122. Plaintiff Romulo Mendoza was not questioned about her identity, work authorization, or immigration status prior to being detained at the Plant and transported to the Armory.

The Claims of Named Plaintiff Martha Pulido

123. Plaintiff Pulido was working on the kill floor area of the Plant the morning of the raid.

124. She suddenly heard officers ordering workers to put their hands up. The Plant quickly became a chaotic scene filled with armed officers shouting. She observed an officer point a firearm at a woman who had tripped and fallen and another tall, white, male officer pushing another female worker. She also observed a male officer punch Plaintiff Guerrero.

125. As a result of the Defendants' actions, Plaintiff Pulido feared that the officers would physically harm her if she did not comply with their orders. She was terrified. She complied with their orders.

126. Defendants ordered Plaintiff Pulido and other workers to exit the Plant. Once Plaintiff Pulido was outside the Plant, officers handcuffed her wrists with zip ties.

127. During this time, Plaintiff Pulido was not free to move around or even to talk. When a worker attempted to speak, officers ordered her to shut up. She was extremely humiliated by this treatment. She felt like she was being treated like a dangerous criminal.

128. Plaintiff Pulido observed that white workers were outside the Plant. Those workers were allowed to walk around freely, were not handcuffed, and were allowed to smoke. None of the Defendants interrogated the white workers.

129. Eventually, Plaintiff Pulido and other Latino workers were transported to the Armory.

130. Upon arrival at the Armory, her personal items were confiscated. Plaintiff Pulido was interrogated and fingerprinted. She was restrained in zip ties until she was fingerprinted.

131. Plaintiff Pulido was detained for approximately fourteen hours.

132. Plaintiff Pulido was not questioned about identity, work authorization, or immigration status prior to being detained at the Plant and transported to the Armory.

The Claims of Named Plaintiff Geronimo Guerrero

133. Plaintiff Guerrero, a long-term employee and supervisor at the Plant, was in the processing area the morning of the raid.

134. From his location, Plaintiff Guerrero observed numerous officers with firearms inside the Plant.

135. A short, white, male officer ("Defendant Doe"), who was armed, approached Plaintiff Guerrero and shouted at him to come towards him. Defendant Doe 1 simultaneously made a fist and intentionally struck Plaintiff Guerrero in the face.

136. Immediately after Defendant Doe 1 punched Plaintiff Guerrero, a second male officer who was tall and of Asian descent arrived and grabbed Plaintiff Guerrero by the arm. Defendant Doe 1 and the other officer pushed Plaintiff Guerrero against the wall and patted him down.

137.

Guerrero remained handcuffed just outside the office entrance with other Latino workers who had also been handcuffed and required to remain there. The Plant's general supervisor, Carl Kinser, who is white, was outside the office. He was permitted to move freely and was not handcuffed.

140. Plaintiff Guerrero remained handcuffed and was required to remain seated at the office entrance area for about an hour. While detained in this area, Plaintiff Guerrero was in a complete state of shock and fear. Other officers controlled this area closely, watching over the workers and ordering them not to move.

141. Eventually the officers escorted Plaintiff Guerrero outside the Plant, where he continued to be detained.

142. He was eventually taken to the Armory with the other Latino workers, where he was interrogated and fingerprinted.

143. At the Armory, Plaintiff Guerrero continued to be restrained by plastic zip ties.

144. Plaintiff Guerrero was detained for approximately twelve hours.

145. Plaintiff Guerrero was not questioned about his identity, work authorization, or immigration status prior to being detained at the Plant and transported to the Armory.

The Claims of Named Plaintiff Luis Bautista Martínez

146. Plaintiff Bautista Martínez was working inside the loading dock of the Plant the morning of the raid.

147. Once the raid began, three white male officers approached him with their firearms pointed at him. Plaintiff Bautista Martínez thought they were terrorists and were going to kill him. He stopped working and put his hands up in the air.

148. A tall, white, male officer grabbed Plaintiff Bautista Martínez by the shirt to walk him outside.

149. Outside, Plaintiff Bautista Martínez saw many federal and THP officers surrounding the Plant and blocking the exits. He saw patrol cars and a helicopter flying above.

150. One of Plaintiff Bautista Martínez's coworkers fell on the ground, and officers immediately ran toward him. One officer put his foot on the worker's head and pointed a gun at him. Two other officers handcuffed the worker.

151. Seeing this, Plaintiff Bautista Martínez feared that the officers would treat him with the same level of aggression.

152. Plaintiff Bautista Martínez and other workers were lined up outside the Plant. Officers handcuffed him while he was standing outside. Plaintiff Bautista Martínez and some of his coworkers were left standing handcuffed outside of the plant for about two hours.

153. During this time, Plaintiff Bautista Martínez asked Defendant Ayala if a pregnant coworker could sit down. Defendant Ayala refused and told Plaintiff Bautista Martínez to "Shut [his] f--king mouth."

154. Plaintiff Bautista Martínez asked several officers for permission to use the restroom himself. Defendant Ayala refused and cursed Plaintiff Bautista Martínez, saying to him "You don't have rights here" and told him "Mexican sh-t."

155. Eventually, after Plaintiff Bautista Martínez said that he urgently needed to use the bathroom, a white, male ICE officer ("Defendant 2") grabbed him by the shoulder and led him to an outside area behind a trailer. Defendant Doe 2 held a firearm to Plaintiff Bautista Martínez's head and told him to relieve himself right there in plain sight of the other officers

outside. Then Defendant Doe 2 laughed and cursed at Plaintiff. Plaintiff Bautista Martínez felt extremely humiliated by this treatment.

156. Approximately two hours after Plaintiff Bautista Martínez was moved outside the Plant, an officer grabbed him by his clothes and pushed him into a van along with the other Latino workers. The van transported Plaintiff Bautista Martínez to the Armory. No white workers were transported to the Armory in the van with Plaintiff Bautista Martínez.

157. While in the van, a male officer, who was overweight, white, and had long blond hair down to his waist, took out his phone and took a picture of himself with the Latino workers in the van, yelling “selfie!” while he snapped the shot.

158. At the Armory, Plaintiff Bautista Martínez continued to be handcuffed with plastic zip ties.

159. During this time, Defendant Ayala berated Plaintiff Bautista Martínez and the other workers. He told them in Spanish to “shut [their] f--king mouths” and yelled that they were “going back to [their] damned s--t country.”

160. Eventually, Plaintiff Bautista Martínez was interrogated and fingerprinted at the Armory.

161. Plaintiff Bautista Martínez was detained for approximately twelve hours.

162. Plaintiff Bautista Martínez was not questioned about his identity, work authorization, or immigration status prior to being detained at the Plant and transported to the Armory.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

Equal Protection in Violation of Fifth Amendment
On Behalf of the Class
(Bivensclaim against All Defendants)

163. Plaintiffs reallege and incorporate by reference each and every allegation contained in paragraphs 1-162 as ifly set forth herein.

164. The Defendants stopped, detained, searched, seized, and/or arrested Plaintiffs and the Class solely on the basis of Plaintiffs' and Class Members' actual or apparent race and ethnicity, in violation of the equal protection component of the Due Process Clause of the Fifth Amendment to the United States Constitution.

165. The Defendants did not seize, detain, search, and/or arrest the similarly situated white workers in the Plant on the day of the raid.

166. The Defendants' actions were motivated by discriminatory intent and racial animus toward Plaintiffs and the Class.

167. The actions of the Defendants were intentional, malicious, and reckless and reflect a

SECOND CAUSE OF ACTION
42 U.S.C. § 1985: Conspiracy to Violate Civil Rights
On Behalf of the Class
(Bivensclaim against All Defendants)

170. Plaintiffs reallege and incorporate by reference each and every allegation contained in paragraphs 1-169 as if fully set forth herein.

171. By agreeing to stop, detain, search, seize, and arrest Plaintiffs and the Class solely on the basis of their actual or apparent race and color, Defendants conspired to deprive Plaintiffs and the Class of the equal protection of the law of the United States, in violation of 42 U.S.C. § 1985(3).

172. As a result of Defendants' actions, Plaintiffs and Class Members suffered damages, including but not limited to actual damages, loss of liberty, humiliation, fear, and emotional distress.

THIRD CAUSE OF ACTION
42 U.S.C. § 1986: Failure to Prevent Violation of Civil Rights
On Behalf of the Class
(Bivensclaim against All Defendants)

173. Plaintiffs reallege and incorporate by reference each and every allegation contained in paragraphs 1-172 as if fully set forth herein.

174. Defendants, having knowledge of the conspir

FOURTH CAUSE OF ACTION

Unreasonable Seizures and/or Arrests in Violation of the Fourth Amendment
On Behalf of Plaintiffs Isabel Zelaya, Ge

183. The Defendants arrested the Plaintiffs without an arrest warrant, probable cause that they had violated U.S. immigration or criminal laws, or exigent circumstances in violation of their Fourth Amendment rights.

184. The right to be free from seizures and arrests that are not supported by a warrant, probable cause, or exigent circumstances is clearly established.

185.

193. The right to be free from the use of excessive force is clearly established.

194. As a result of Defendant Doe 1's actions, Plaintiff Guerrero has suffered damages, including but not limited to actual damages, pain and suffering, humiliation, fear, and emotional distress.

SIXTH CAUSE OF ACTION

Excessive Force in Violation of Fourth Amendment
On Behalf of Plaintiff Luis Bautista Martínez
(Bivensclaim against Defendant Doe)2

195. Plaintiff Bautista Martínez realleges and incorporates by reference each and every

h. A determination that Plaintiffs' Third Cause of Action may properly be maintained as a class action pursuant to Fed. R. Civ. P. 23(b)(3);

i. An order finding that Plaintiffs Gonzalez Cruz and Zapote Hernández are proper representatives of the Class Members and appoint the undersigned as Class Counsel.

j. An order awarding Plaintiffs costs of suit and reasonable attorneys' fees and expenses pursuant to applicable law; and

k. Such other and further relief as the Court deems equitable, just and proper.

Dated: February 21, 2019

Respectfully Submitted,

/s/ John L. Farringer
William L. Harbison (No. 7012)*
Phillip F. Cramer (No. 20697)*
John L. Farringer IV (No. 22783)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date the foregoing and accompanying documents were filed through the Court's CM/ECF filing system and will be served on the defendants listed below with the summons. When service is complete a Proof of Service form will be filed with the Court, which Proof of Service will list the date, method, and documents served.

Jere Miles, Special Agent in Charge, HSI
669 Silverthorne Lane
Covington, LA 70433-7823

Robert Hammer, Assistant Special Agent in Charge, HSI
3841 Cannondale Drive
Clarksville, TN 37042-1507

David Vicente, Agent, ICE, ERO
1105 Mercer Drive
Maryville, TN 37801-9320

Francisco Ayala, Agent, ICE ERO
608 Belle Oak Lane
Brandon, MS 39042-8101

Billy Riggins, Special Agent, ICE
Department of Homeland Security
3801 Nebraska Avenue, NW
Washington, DC 20016

William Hinkle, Deportation Officer, ICE
6704 35th Street
Lubbock, TX 79407-1810

Anthony Martin, Deportation Officer, ICE
Department of Homeland Security
3801 Nebraska Avenue, NW
Washington, DC 20016

M. Grooms, Deportation Officer, ICE
Department of Homeland Security
3801 Nebraska Avenue, NW
Washington, DC 20016

Scott Pa, Special Agent, ICE
Department of Homeland Security
3801 Nebraska Avenue, NW
Washington, DC 20016

United States Attorney, Eastern District of Tennessee
800 Market Street, Suite 211
Knoxville, Tennessee 37902

United States Attorney General
950 Pennsylvania Avenue, NW
Washington, D.C. 20530

Dated: February 21, 2019

/s/ John L. Farringer