

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE CHIEF ADMINISTRATIVE HEARING OFFICER

July 21, 2025

ZAJI OBATALA ZAJRADHARA,	)	
Complainant,	)	
	)	
	)	
v.	)	8 U.S.C. § 1324b Proceeding
	)	OCAHO Case No. 2024B00020
	)	
	)	
BLOSSOM CORPORATION,	)	
Respondent.	)	
	)	

Appearances: Zaji Zajradhara, pro se Complainant
Wei Lin, for Respondent

ORDER DENYING RESPONDENT’S MOTION FOR SANCTION – NO VEXATIOUS
LITIGANT DESIGNATION AVAILABLE IN THE FORUM

On July 9, 2025, the Court issued an Order Denying Respondent’s Motion for Summary Decision. In that Order, the Court noted that Respondent’s Motion for Sanctions, contained in the Motion for Summary Decision, would be addressed in a separate order. July 9, 2025 Order Den. Mot. Summ. Dec. 1 n.2. This Order addresses Respondent’s request for sanctions.

In its Motion, Respondent requests the Court declare Complainant a “vexatious litigant” and bar him “from any further and future filings, complaints or proceedings before OCHAO [sic] or the USDOL Civil Rights Division except upon application for and grant of leave on showing of a realistic prospect of success on the merits.” Mot. Sanctions 1. As basis for such a request, Respondent argues that “Mr. Zajradhara’s litigation history in this and other forums [sic] reflects a pattern of bringing baseless complaints transparently designed as attempts to harass and extort money from CNMI businesses.” Mot. Sanctions 2. In Respondent’s view, this litigation strategy “satisf[ies] the [Ninth Circuit’s] standard for designating vexatious litigants and enjoying further litigious activity without prior leave.” Mot. Sanctions 3–4 (citing *Molski v. Evergreen Dynasty Corp.*, 500 F.3d 1047 (9th Cir. 2007)).

Complainant maintains that his “actions are not based on frivolous claims, but on a genuine belief in the importance of upholding the law and promoting equality in the workplace.” Resp. 2.

This Court need not answer the question of whether Complainant’s conduct meets the Ninth Circuit’s standard to declare him a “vexatious litigant” and enter a prefiling injunction against him. The Ninth Circuit’s own precedent regarding such sanctions holds that federal courts—not administrative fora—may impose them. *See De Long v. Hennessey*, 912 F.2d 1144, 1147 (9th Cir. 1990) (recognizing the “inherent power of federal courts to regulate the activities of abusive litigants by imposing” prefiling injunctions pursuant to the All Writs Act, 28 U.S.C. § 1651(a)); *Molski*, 500 F.3d at 1057 (“The All Writs Act . . . provides district courts with the inherent power to enter pre-filing orders against vexatious litigants.”); *see also United States v. Facebook, Inc.*, 14 OCAHO no. 1386b, 6 (2021) (“OCAHO is a forum of limited jurisdiction,” which jurisdiction is limited to “the text and construction of [8 U.S.C. § 1324b], which sets forth what Congress has directed this Court to adjudicate, and conversely what is outside the scope of this Court’s jurisdictional ambit.”).¹

Neither 8 U.S.C. § 1324b nor the regulations implementing it, codified at 28 C.F.R. pt. 68 (2024), authorize this Court to issue prefiling injunctions pursuant to the All Writs Act. Respondent pointed to no such statutory or regulatory authority in its motion, either, and so with no basis for the proposed sanction other than *Molski*, the Court finds itself incapable of ordering the requested relief. Accordingly, Respondent’s Motion for Sanctions is DENIED.

SO ORDERED.

Dated and entered on July 21, 2025.

Honorable Andrea R. Carroll-Tipton
Administrative Law Judge

¹ Citations to OCAHO precedents in bound volumes one through eight include the volume and case number of the particular decision followed by the specific page in the bound volume where the decision begins; the pinpoint citations which follow are to the pages, seriatim, of the specific entire volume. Pinpoint citations to OCAHO precedents after volume eight, where the decision has not yet been reprinted in a bound volume, are to pages within the original issuances; the beginning page number of an unbound case will always be 1 and is accordingly omitted from the citation. Published decisions may be accessed through the Westlaw database “FIM OCAHO,” the LexisNexis database “OCAHO,” and on the United States Department of Justice’s website: <https://www.justice.gov/eoir/office-of-the-chief-administrative-hearing-officer-decisions>.