

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

SAMUEL OCHOA OCHOA,  
Petitioner,

v.

KRISTI NOEM, Secretary, U.S. Department  
of Homeland Security, in her official capacity;

TODD M. LYONS, Acting Director of U.S.  
Immigration and Customs Enforcement, in his  
official capacity;

SAM OLSON, Deputy Field Office Director,  
Chicago Field Office, Immigration and  
Customs Enforcement, in his official  
capacity;  
Respondents.

Case No. 25-cv-10865

**PETITION FOR A WRIT OF HABEAS CORPUS  
EMERGENCY RELIEF REQUESTED**

Petitioner Samuel Ochoa Ochoa files a motion for temporary restraining order and petition for habeas corpus relief, seeking his release from Respondents' custody and an order instructing Respondents to refrain from moving him from the Clay County Detention Center, where he is currently detained or, alternatively, from the jurisdiction of the Chicago Immigration Court, until this case is resolved. As discussed in Petitioner's separately filed memorandum in support, Petitioner is a noncitizen from Venezuela who was previously released by Respondents on his own recognition, placed in standard removal proceedings, and allowed to pursue his asylum claim before being unlawfully placed in mandatory detention.

Respectfully submitted,

Dated: September 18, 2025

s/ Keren Zwick

Keren Zwick  
Charles Roth

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