

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

Alfa Nohemi Chavez Alvarez;

Jaime Misael Ramirez Ambrosio;

D.R.C.;

J.R.C.;

Petitioners,

v.

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

GREGORY BOVINO, Chief Patrol Agent for
El Centro Sector of the U.S. Border Patrol, in
his official capacity;

RODNEY S. SCOTT, Commissioner of
Customs and Border Protection, in his official
capacity;

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

SAMUEL OLSON, Field Office Director,
Chicago Field Office, Immigration and
Customs Enforcement, in his official
capacity;

Respondents.

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

Petitioners, Alfa Nohemi Chavez Alvarez, Jaime Misael Ramirez Ambrosio, and their two minor children, D.R.C. and J.R.C., file a motion for temporary restraining order and petition for habeas corpus relief, seeking their release from Respondents' custody and an order instructing Respondents to refrain from moving them outside of the jurisdiction of the Northern District of Illinois, where they are currently detained, without this Court's approval. As discussed in Petitioners' separately filed memorandum in support, Petitioners Alvarez and Ambrosio are noncitizens from Guatemala who were previously released by Respondents on their own recognizance, placed in standard removal proceedings, and allowed to pursue asylum claims before being unlawfully placed in mandatory detention.

Respectfully submitted,

Dated: September 29, 2025

s/ Keren Zwick

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