UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ALFA NOHEMI CHAVEZ ALVAREZ, *et al.*,	)	
Petitioners,	)	
	)	No. 25 C 11853
v.	)	
	)	Judge Ellis
KRISTI NOEM, in her official capacity as Secretary of Homeland Security, *et al.*,	)	
Respondents.	)	

RESPONSE IN OPPOSITION TO PETITIONERS' PETITION FOR A WRIT OF HABEAS CORPUS AND MOTION FOR TEMPORARY RESTRAINING ORDER

ANDREW S. BOUTROS
United States Attorney for
the Northern District of Illinois

JOSHUA S. PRESS
Assistant United States Attorney
219 South Dearborn Street, Fifth Floor
Chicago, Illinois 60604
Tel: (312) 886-7625
e-Mail: joshua.press@usdoj.gov

Table of Contents **Page**

Table of Authorities

Cases **Page(s)**

Statutes

Regulations

Introduction

The petitioners in this matter are natives and citizens of Guatemala who are attacking their detention by U.S. Immigration and Customs Enforcement ("ICE") while they pursue applications for asylum before an immigration judge. But, as explained below, their habeas petition, Dkt. 1, should be dismissed for lack of jurisdiction, and their motion for a temporary restraining order, Dkt. 2, should concomitantly be denied.

Background

The petitioners in this matter are a family of four from Guatemala: Alfa Nohemi Chavez Alvarez (the mother), Jaime Misael Ramirez Ambrosio (the father), and their two children, D.R.C. and J.R.C. *See* Pet.¶¶ 1, 13. In "approximately December 2023," they "entered the United States without inspection and were apprehended by immigration authorities shortly after entry. After being briefly detained, Petitioners were released on orders of recognizance and placed in standard removal proceedings pursuant to 8 U.S.C. § 1229a." *Id.* at ¶ 40. According to the petition, the petitioners' removal proceedings will involve, *inter alia*, inadmissibility under 8 U.S.C. § 1182(a)(6)(A)(i) as foreign nationals "who entered the United States without inspection." *Id.* at ¶ 41. Consequently, both Alvarez and Ambrosio "have pending removal proceedings with hearing dates set for October 2027." *Id.* at ¶ 42. However, on "September 28, 2025, Petitioners were detained by DHS while having a family outing at Millenium Park in Chicago, Illinois." Dkt. 2-1 ("Petr. Mem.") at 4. As understood by petitioners' counsel, Alvarez was "detained at or near the O'Hare International Airport with her two minor children," while Ambrosio was "detained at Immigration and Customs Enforcement's (ICE's) Broadview Processing Center just outside of Chicago, Illinois." Pet. ¶ 13.

In response to their detention, petitioners filed this action at 4:16 p.m. (CDT) on Monday, September 29, 2025. Dkt. 1. The petition is brought under 28 U.S.C. § 2241, Pet. ¶ 8, demands

that petitioners not be detained unless they are given individualized bond hearings during their removal proceedings, *see id.* at 12 (Prayer for Relief), and claims that their continued detention contravenes both the Immigration and Nationality Act ("INA") (Count I), *id.* at ¶¶ 46–48; and the Due Process Clause of the Fifth Amendment (Count II), *id.* at ¶¶ 49–52. Their memorandum in support of their motion presses the same claims. *See* Petr. Mem. at 5–10.

What is not discussed in the petition is how Ambrosio's past immigration history is more eventful. Specifically, he has previously been ordered removed from this country on two separate occasions: one in April 2003 under § 1182(a)(6)(A)(i) (the same charge as discussed in the petition), Exhibit B, the other in May 2013, Exhibit C. And he pleaded guilty to illegal entry, 8 U.S.C. § 1325(a)(1), in September 2014. Exhibit D; *see also United States v. Ramirez-Ambrocio*, No. 14-cr-62857, Dkt. 1 (D. Ariz. Sept. 18, 2014). Based on Ambrosio's past orders of removal and repeated illegal entries into the United States, ICE transported him out of the Broadview processing center before the instant petition was filed with this court. *See* Dkt. 9-1, Declaration of Deportation Officer Morales ("Morales Decl.") at ¶ 9; *see also* Exhibit E (row 2, column 7 show that Ambrosio was booked out of Broadview at 9:46 a.m. (CDT)). More specifically, he was transported out of Broadview on the morning of September 29th "to Gary-Chicago International Airport in Gary, Indiana," by "12:10 p.m. (CDT) he was flown to Indianapolis International Airport in Indianapolis, Indiana," and at "2:45 p.m. (CDT), he was flown to Valley International Airport in Harlingen, Texas," where he "arrived at 3:45 p.m. (CDT)." *Id.* "He was then transported to the Port Isabel Service Processing Center in Los Fresnos, Texas" and "booked into" ICE's Enforcement and Removal Operations ("ERO") custody in the evening of September 29, 2025. *Id.*

Meanwhile, an emergency hearing was conducted on September 29, 2025, at 7:30 p.m.

(CDT). Dkt. 6. Acting in his capacity as emergency judge, Judge Harjani, and based on the parties' understanding on the petitioners' locations at that time, ordered that respondents "not transfer Petitioners from the Northern District of Illinois, nor remove them from the jurisdiction of the United States, starting at 7:50 p.m. Central Standard Time on September 29, 2025 through October 6, 2025." Dkt. 7. Once it became clear to respondents' counsel that complying with the intent of that order vis-à-vis Ambrosio was not possible, though, respondents' counsel filed a status report regarding Ambrosio's custody on October 1, 2025. Dkt. 9; *see also* Morales Decl. ¶ 9.

That same day, Alvarez and the two child petitioners were released on their own recognizance. *See* Exhibit F.

Legal Standards

I. Habeas Relief

Section 2241 confers jurisdiction on this court to order the release of any person who is held in the custody of the United States in violation of the "laws . . . of the United States" or the United States Constitution. 28 U.S.C. § 2241(c). The burden rests on the person in custody to prove their detention is unlawful. *See, e.g.*, *Walker v. Johnston*, 312 U.S. 275, 286 (1941).

II. Preliminary Injunctive Relief

Under Federal Rule of Civil Procedure 65, a district court may issue a temporary restraining order or preliminary injunction. Here, petitioners seek a temporary restraining order. Dkt. 2. "The standard for issuing a temporary restraining order is the same one that governs issuance of a preliminary injunction," *Inventus Power, Inc. v. Shenzhen Ace Battery Co., Ltd.*, No. 20 C 3375, 2020 WL 3960451, at *4 (N.D. Ill. July 13, 2020), which is "never awarded as of right," *Munaf v. Geren*, 553 U.S. 674, 690 (2008), and "is an extraordinary and drastic remedy, one that should not be granted unless the movant, *by a clear showing*, carries the burden of persuasion," *Mazurek v. Armstrong*, 520 U.S. 968, 972 (1997) (cleaned up). More specifically, a movant for preliminary

relief "must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest." *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008).

As the Seventh Circuit has explained, an "applicant must make a strong showing that he is likely to succeed on the merits." *Ill. Republican Party v. Pritzker*, 973 F.3d 760, 762 (7th Cir. 2020). "[A] possibility of success is not enough. Neither is a 'better than negligible' chance." *Id.* Movants must also demonstrate clearly, and through specific factual allegations, that immediate and irreparable injury will result to them absent the order. *City of Los Angeles v. Lyons*, 461 U.S. 95, 101–02 (1983) (citations omitted). Only if the movant meets their burden of showing both a likelihood of success on the merits and an imminent risk of irreparable harm will courts then engage in further analysis. *See Christian Legal Soc'y v. Walker*, 453 F.3d 853, 859 (7th Cir. 2006).

Argument

I. Petitioners Have No Likelihood of Success.

A. This Case Is Moot for Alvarez and the Children.

As a threshold matter, this case is moot regarding Alvarez and the two child petitioners. This is because they were ordered released on their own recognizance just yesterday, Exhibit F, and "release moots [their] federal claims[.]" *Peshek v. Johnson*, 111 F.4th 799, 802 (7th Cir. 2024) (citing *DeFunis v. Odegaard*, 416 U.S. 312, 319–20 (1974) (per curiam)). At this morning's status hearing, petitioner's counsel noted that Alvarez is still subject to electronic monitoring, and thus her claims are not moot. Dkt. 12. But a case can become moot where the plaintiff receives the requested relief before the litigation of the claim is complete. *See DeFunis*, 416 U.S. at 319–20.

This principle applies here because the claims and arguments petitioners bring here are laser-focused on them receiving bond hearings so that they might be able to obtain orders of release on their own recognizance. *See* Pet. at 12 (asking for "individualized determination[s]" and "a

prompt bond hearing" for the purpose of obtaining release from ICE detention); *see also* Petr. Mem. at 9 (arguing for a likelihood of success on the merits by claiming that "[b]y subjecting Petitioners to mandatory detention without bond, Respondents commit several errors"). As mentioned above, however, the need for petitioners to receive individualized bond hearings is no longer present. Alvarez and the children are now only being electronically monitored to ensure that they do not abscond during their removal proceedings under 8 U.S.C. § 1229a.[1] The changed circumstances justifying her electronic monitoring therefore render this case moot. *Cf. Jackson v. Clements*, 796 F.3d 841, 842–43 (7th Cir. 2015) (per curiam) (case was moot where habeas petitioner "challeng[ed] his extradition from Illinois to Wisconsin" because he "was no longer a pre-trial detainee when the district court ruled on the merits of his petition").

Further, even if petitioners' legal argument about detention authority under 8 U.S.C. § 1225(b) versus § 1226(a) were correct, *see* Petr. Mem. at 5–9, detention is explicitly in the agency's discretion during removal proceedings under § 1226(a): "an alien *may* be arrested and detained pending a decision on whether the alien is to be removed from the United States[.]" This means that "detaining" Alvarez and the children via ankle-monitoring is entirely lawful, discretionary, and indeed is regularly applied to persons across the country while their removal proceedings are litigated. *See, e.g.*, *Corpeno-Argueta v. United States*, 341 F. Supp. 3d 856, 867 n.6 (N.D. Ill. 2018) (citing cases).

More importantly for this court, though, is how the "may" language within § 1226(a) means that the relief still being sought by petitioners is specified as a discretionary decision under

[1] To the extent petitioners would prefer to not be subject to electronic monitoring while they are in removal proceedings, 8 C.F.R. § 1236.1(d)(1) provides a mechanism for "[a]ppeals from custody decisions." They may also request such an alteration before an immigration judge during their removal proceedings.

the INA. *See, e.g.*, *Bouarfa v. Mayorkas*, 604 U.S. 6, 13–14 (2024) ("As 'this Court has repeatedly observed,' 'the word may *clearly* connotes discretion.'" (emphasis in original) (quoting *Biden v. Texas*, 597 U.S. 785, 802 (2022) (cleaned up)). That fact is fatal to this court's jurisdiction under the plain text of 8 U.S.C. § 1252(a)(2)(B)(ii), which bars district courts from reviewing "any other decision or action of the Attorney General or the Secretary of Homeland Security the authority for which is specified under this subchapter to be in the discretion of the Attorney General or the Secretary of Homeland Security, other than the granting of relief under section 1158(a) of this title." And that jurisdictional bar extends to "pure questions of law," too. *See Dijamco v. McAleenan*, No. 18 C 3338, 2019 WL 13280486, at *5–6 (N.D. Ill. Aug. 12, 2019) (Ellis, J.), *aff'd sub. nom.*, *Dijamco v. Wolf*, 962 F.3d 999, 1003 (7th Cir. 2020); *see also Bultasa Buddhist Temple of Chicago v. Nielsen*, 878 F.3d 570, 573 (7th Cir. 2017); *El-Khader v. Monica*, 366 F.3d 562, 567 (7th Cir. 2004). And that bar includes even constitutional claims. *See, e.g.*, *Fathers of St. Charles v. USCIS*, No. 24 C 13197, 2025 WL 2201013, at *6 (N.D. Ill. Aug. 1, 2025); *Nobles v. Noem*, No. 24 C 9473, 2025 WL 860364, at *5–6 (N.D. Ill. Mar. 19, 2025).

B. This Court Lacks Jurisdiction Over Ambrosio's Ongoing Detention Because of 8 U.S.C. § 1252(g).

This court also lacks jurisdiction regarding Ambrosio's continued detention under 8 U.S.C. § 1252(g). Among other things, that provision precludes judicial review of the decision to execute removal orders, and ICE is currently in the process of reinstating Ambrosio's past removal orders at this very moment. The language in 8 U.S.C. § 1252(g) is unequivocal and its text controls here:

> Except as provided in this section and notwithstanding any other provision of law (statutory or nonstatutory), including section 2241 of title 28, or any other habeas corpus provision, and sections 1361 and 1651 of such title, no court shall have jurisdiction to hear any cause or claim by or on behalf of any alien *arising from the decision or action by the Attorney General to commence proceedings*, adjudicate cases, *or execute removal orders against any alien* under this chapter.

8 U.S.C. § 1252(g) (emphases added). Given this statutory language, the Supreme Court has likewise noted this power of immigration-related enforcement discretion on numerous occasions. *See, e.g.*, *Arizona v. United States*, 567 U.S. 387, 396 (2012) ("A principal feature of the removal system is the broad discretion exercised by immigration officials. Federal officials, as an initial matter, must decide whether it makes sense to pursue removal at all."). The petition here ignores both the statute and this historical discretion. But binding case law does not.

In *Reno v. American Arab Anti-Discrimination Committee*, 525 U.S. 471 (1999) ("*AADC*"), for example, the Supreme Court considered the reach of § 1252(g) and the Executive's discretion over immigration enforcement—concluding that the provision demands a narrow reading. More specifically, that jurisdictional bar "applies . . . to three discrete actions that the [federal government] may take: [the] 'decision or action' to '*commence* proceedings, *adjudicate* cases, or *execute* removal orders.'" *Id.* at 482 (emphases in original). "At each stage the Executive has discretion to abandon the endeavor" of removal, or to proceed, without judicial interference. *Id.* at 483–84.

The Seventh Circuit's decision in *E.F.L. v. Prim*, 986 F.3d 959 (7th Cir. 2021), is equally helpful regarding the definition of what constitutes "any" challenge to one of § 1252(g)'s three stages. In that case, the habeas petitioner sought injunctive relief to prevent her deportation pending administrative review of another petition for immigration relief (more specifically, a petition for relief under the Violence Against Women Act ("VAWA")). *Id.* at 961–62. Although the *E.F.L.* petitioner's VAWA petition was still pending with USCIS, the court of appeals nonetheless held that § 1252(g) barred habeas jurisdiction because the "habeas petition falls directly in § 1252(g)'s path" as she "challenge[d] DHS's decision to execute her removal order while she seeks administrative relief." *Id.* at 964. And *E.F.L.* likewise explained that

section "1252(g) precludes judicial review of 'any' challenge to 'the decision or action by [DHS] to . . . execute removal orders,'" which "includes challenges to DHS's 'legal authority' to do so." *Id.* at 965 (alteration in original).

Ambrosio's challenge in this case is functionally identical to *E.F.L.*, as it is simply another challenge to the Executive's legal authority to execute past removal order(s) while Ambrosio's removal proceedings are still pending before an immigration judge, with the added twist of including a policy argument about bond hearings during removal proceedings. *See generally* Pet. To conclude that there is some sort of wiggle room around § 1252(g) under such circumstances would make the provision "a paper tiger; any petitioner challenging the execution of a removal order could characterize his or her claim as an attack on DHS's 'legal authority' to execute the order and thereby avoid § 1252(g)'s bar. [The court] will not render § 1252(g) so toothless." *E.F.L.*, 986 F. 3d at 965 (internal citations omitted). And that approach is in line with many other courts of appeals. *See Rauda v. Jennings*, 55 F.4th 773, 777–78 (9th Cir. 2022); *Camarena v. Dir. of ICE*, 988 F.3d 1268, 1274 (11th Cir. 2021) ("[W]e do not have jurisdiction to consider 'any' cause or claim . . . arising from the government's decision to execute a removal order. If we held otherwise, any petitioner could frame his or her claim as an attack on the government's *authority* to execute a removal order rather than its *execution* of a removal order."); *Tazu v. Att'y Gen.*, 975 F.3d 292, 297 (3d Cir. 2020) (rejecting a habeas petition challenging the timing of DHS decision to execute a removal order); *Hamama v. Adducci*, 912 F.3d 869, 874 (6th Cir. 2018); *Silva v. United States*, 866 F.3d 938, 941 (8th Cir. 2017) (noting how § 1252(g) applies to constitutional claims arising from the execution of a final order of removal, and language barring "any cause or claim" made it "unnecessary for Congress to enumerate every possible cause or claim"); *Tsering v. ICE*, 403 F. App'x 339, 342–43 (10th Cir. 2010); *Foster v. Townsley*, 243 F.3d 210, 214 (5th

Cir. 2001).

In fact, other decisions from this judicial district are in line with *E.F.L.* In *Albarran v. Ricardo Wong*, 157 F. Supp. 3d 779, 782 (N.D. Ill. 2016), for example, the plaintiff believed he was entitled to a stay of a reinstated removal order based on his interpretation of an internal ICE memorandum that made his offense "a second level priority." The *Albarran* court concluded that § 1252(g) blocks review of specific types of administrative decisions. *Id.*; *accord Hussain v. Keisler*, 505 F.3d 779, 783–84 (7th Cir. 2007); *Wigglesworth v. INS*, 319 F.3d 951, 960 (7th Cir. 2003); *Gomez-Chavez v. Perryman*, 308 F.3d 796, 800–01 (7th Cir. 2002); *Sharif ex. rel. Sharif v. Ashcroft*, 280 F.3d 786, 787 (7th Cir. 2002). Importantly, a foreign national cannot evade § 1252(g) by attempting to recharacterize a claim that, at its core, attacks the decision to execute a removal order. *See Lemos v. Holder*, 636 F.3d 365, 367 (7th Cir. 2011); *Fedorca v. Perryman*, 197 F.3d 236, 240 (7th Cir. 1999) (affirming dismissal of habeas petition brought under 28 U.S.C. § 2241, because the relief sought (a stay of deportation) was barred by § 1252(g)); *Jung Ok Seol v. Holder*, No. 13 C 1379, 2013 WL 3835370, at *3 (N.D. Ill. July 24, 2013); *Dave v. INS*, No. 03 C 852, 2003 WL 466006, at *1 (N.D. Ill. Feb. 20, 2003).

In his petition and motion for relief, Ambrosio does not address his immigration history, including his three prior removals from this country. *See* Exhibit E (column 8 showing Ambrosio was removed in 2014, 2013, and 2003). His claims instead boil down to how no removal order can be executed while he is in immigration proceedings, and that he cannot constitutionally be detained without a bond hearing during those removal proceedings. *See generally* Pet. ¶¶ 46–52. Given the case law discussed above, though, Ambrosio's ability to challenge the reinstatement and execution of his past removal orders is barred by § 1252(g). *See AADC*, 525 U.S. at 482; *see also Velarde-Flores v. Whitaker*, 750 F. App'x 606, 607 (9th Cir. 2019) (no jurisdiction under

§ 1252(g) to enjoin removal of foreign nationals with final orders of removal and pending petitions); *Rivas-Melendrez v. Napolitano*, 689 F.3d 732, 737–38 (7th Cir. 2012) (no jurisdiction under § 1252(g) to hear challenge to execution of removal order after removal occurred).

Finally, to the extent the court reads the petition as an attack on Ambrosio's short-term detention by ICE in order to execute his reinstated removal order to Guatemala, that claim would be equally barred by the plain language of § 1252(g). *See, e.g.*, *Tazu*, 975 F.3d at 298. This is because a "challenge to [a] short re-detention for removal attacks a key part of *executing* his removal order." *Id.* (emphasis added). The verb "execute" within § 1252(g)'s phrase "execute removal orders" means "[t]o perform or complete." Execute, *Black's Law Dictionary* (11th ed. 2019). And to perform or complete a removal, DHS must exercise its "discretionary power to detain an alien for a few days. That detention does not fall within some other 'part of the deportation process.'" *Id.* (quoting *AADC*, 525 U.S. at 482). Thus, "a brief door-to-plane detention is integral to the act of 'execut[ing] [a] removal order[.]'" *Id.* (quoting § 1252(g)).

C. This Court Also Lacks Jurisdiction Regarding Ambrosio Because the Petition Was Not Brought Against His Immediate Custodian.

This court should also deny the petition vis-à-vis Ambrosio because he was not detained in this jurisdiction (or by a respondent within the jurisdiction of this district court) at the time the petition was filed. *See Trump v. J.G.G.*, 604 U.S. 670, 672 (2025) (because "[t]he detainees are confined in Texas . . . venue is improper in the District of Columbia" and that, "[a]s a result, the Government is likely to succeed on the merits of this action"). The federal habeas corpus statute, 28 U.S.C. §§ 2241–55, provides that the proper respondent to a habeas petition is "the person who has custody over [the petitioner]," 28 U.S.C. § 2242, and that district courts may grant writs of habeas corpus only "within their respective jurisdictions," 28 U.S.C. § 2241(a). For "core" habeas petitions—petitions challenging present physical confinement (like the petition involved here)—

the Supreme Court has held that "there is generally only one proper respondent to a given prisoner's habeas petition," and that this singular proper respondent is the petitioner's "immediate custodian." *Padilla v. Rumsfeld*, 542 U.S. 426, 434–35 (2004). Thus, well-settled practice dictates that the custodian is defined as "the warden of the facility where the prisoner is being held, not the Attorney General or some other remote supervisory official." *Id.* at 435. As the Seventh Circuit has recognized, this is because the writ of habeas corpus acts not upon the petitioner, but upon the person who confines him in allegedly unlawful custody. *See Robledo-Gonzalez v. Ashcroft*, 342 F.3d 667, 673 (7th Cir. 2003) (citing *Braden v. 30th Judicial Cir. Ct. of Ky.*, 410 U.S. 484, 494–95 (1973)). Courts should therefore be cautious not to "conflate the person responsible for authorizing custody with the person responsible for maintaining custody." *al-Marri v. Rumsfeld*, 360 F.3d 707, 711 (7th Cir. 2004).

As in other cases before Article III courts of limited jurisdiction, the petitioner must come forward with "competent proof" supporting his jurisdictional allegations. *NLFC, Inc. v. Devcom Mid-Am., Inc.*, 45 F.3d 231, 237 (7th Cir. 1995); *see also Kontos v. U.S. Dep't of Labor*, 826 F.2d 573, 576 (7th Cir. 1987). The petition here attempts to comply with the immediate custodian rule by claiming that Ambrosio was detained at Broadview, but by the time the petition was filed at 4:16 p.m. (CDT), he was already in Texas—nowhere in this district. Morales Decl. ¶ 9. That is a problem because the Seventh Circuit recognizes that habeas cases must be brought in the proper district of the petitioner's confinement, not *past* confinement. *Kholyavskiy v. Achim*, 443 F.3d 946, 949–51 (7th Cir. 2006). No such immediate custodian is present here. Morales Decl. ¶ 9. Thus, because none of the respondents is Ambrosio's immediate custodian, this court lacks jurisdiction to hear his claims for habeas relief, and he should be dismissed from this case under Federal Rule of Civil Procedure 12(b)(1).

Ambrosio faces the same inevitable jurisdictional result: he has not named the proper respondents to each of his claims, and as such, under *Kholyavskiy*, his claims must be dismissed for lack of jurisdiction. Thus, applying the Seventh Circuit precedent to this case regarding where and whom to sue in a habeas corpus petition brought under 28 U.S.C. § 2241, the default rule is that one must (1) sue the actual custodian—the person in charge of the jail or prison—(2) in the district of confinement. *See al-Marri*, 360 F.3d at 708. Pursuant to the federal habeas statute, federal judges are entitled to issue writs of habeas corpus "within their respective jurisdictions," and the writ "shall allege the facts concerning the applicant's commitment or detention, the name of the person who has custody over him, and by virtue of what claim or authority, if known." 28 U.S.C. §§ 2241(a), 2242, and 2243. "Long ago the Supreme Court held that the phrase 'within their respective jurisdictions' in § 2241's predecessor limits proceedings to the federal district in which petitioner is detained." *al-Marri*, 360 F.3d at 709 (citations omitted); *see also Kholyavskiy* at 443 F.3d at 949.

With this backdrop in mind, and because Ambrosio has named *no one* with actual custody over him, his habeas claims must be dismissed for lack of jurisdiction. *Yacobo v. Achim*, No. 06 C 1425, 2008 WL 907444, at *3 (N.D. Ill. Mar. 31, 2008). As the Seventh Circuit stated in *Kholyavskiy*: "Congress has provided that an application for a writ of habeas corpus shall allege, among other matters, the name of the person who has actual custody over" the petitioner. 443 F.3d at 948 (cleaned up). And if the writ is "granted by the district court, it 'shall be directed to the person having custody of the person detained.'" *Id.* (quoting 28 U.S.C. § 2243) (citing *Robledo-Gonzales*, 342 F.3d at 673). Finally, this strict adherence to the habeas statute "fits within the logic of collateral relief" because "[t]he writ of habeas corpus does not act upon the prisoner who seeks relief, but upon the person who holds him in what is alleged to be unlawful custody." *Kholyavskiy*,

443 F.3d at 949, (citing *Braden*, 410 U.S. at 494–95). In this case, no respondent had custody when the petition was filed, meaning it is impossible for the court here to issue the writ as to the proper person (that is, the actual immediate custodian). Thus, without a proper respondent, there is no relief that the court may grant to the petitioner regarding those who allegedly hold him in "unlawful custody," and as such, Ambrosio must be dismissed from this case for lack of jurisdiction. *See* Fed. R. Civ. P. 12(h)(3).

D. Alternatively, Detention During Removal Proceedings Do Not Violate Due Process.

Setting aside the jurisdictional problems discussed above, petitioners' due process claim, Pet. ¶¶ 49–52, is off-base because they admittedly never effected a lawful entry, *see Kaplan v. Tod*, 267 U.S. 228, 230 (1925) (holding that, despite nine years of physical presence on parole, a foreign national "was still in theory of law at the boundary line and had gained no foothold in the United States"). Without a lawful entry or admission, petitioners have no more due process rights than what processes Congress chooses to provide them. *See DHS v. Thuraissigiam*, 591 U.S. 103, 114, 139–40 (2020); *Landon v. Plasencia*, 459 U.S. 21, 32 (1982) ("This Court has long held that an alien seeking initial admission to the United States requests a privilege and has no constitutional rights regarding his application, for the power to admit or exclude aliens is a sovereign prerogative"); *United States ex rel. Knauff v. Shaughnessy*, 338 U.S. 537, 544 (1950) ("Whatever the procedure authorized by Congress is, it is due process[.]"); *cf. also Licea-Gomez v. Pilliod*, 193 F. Supp. 577, 580 (N.D. Ill. 1960) ("Nor does the fact that the excluded alien is paroled into the country . . . change his status or enlarge his rights. He is still subject to the statutes governing exclusion and has no greater claim to due process than if he was held at the border.").

To this end, the Supreme Court has also long applied the so-called "entry fiction" that all "aliens who arrive at ports of entry . . . are treated for due process purposes as if stopped at the

border." *Thuraissigiam*, 591 U.S. at 139. Indeed, that is so "even [for] those paroled elsewhere in the country for years pending removal." *Id.* The Supreme Court has applied the entry fiction to foreign nationals with highly sympathetic claims to having "entered" and developed significant ties to this country. *See, e.g.*, *Kaplan v. Tod*, 267 U.S. 228, 230 (1925) (holding that a mentally disabled girl paroled into the care of U.S. citizen relatives for nine years should be "regarded as stopped at the boundary line" and "had gained no foothold in the United States"); *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 214–215 (1953) (holding that a foreign national with 25 years' of lawful residence who sought to reenter enjoyed "no additional rights" beyond those granted by "legislative grace"). With these cases in mind, it follows that Congress intended for an unlawful entrant who violates immigration laws and evades detection must, once found, be "treated as if stopped at the border." *See Mezei*, 345 U.S. at 215.

Indeed, Supreme Court precedents indicate that foreign nationals who entered illegally by evading detection while crossing the border should be treated the same as those who were stopped at the border in the first place. *See Thuraissigiam*, 591 U.S. at 138–40. While foreign nationals who have been *admitted* may claim due-process protections beyond what Congress has provided even when their legal status changes (such as a foreign national who overstays a visa, or is later determined to have been admitted in error), *see Wong Yang Sung v. McGrath*, 339 U.S. 33, 49–50 (1950), the Supreme Court has never held that foreign nationals who have "entered the country clandestinely" are entitled to such additional rights, *see Yamataya v. Fisher*, 189 U.S. 86, 1000 (1903). Congress has instead codified the distinction between admitted and non-admitted foreign nationals by treating the latter category—including unlawful entrants who have evaded detection

for years—as "applicants for admission."[2] 8 U.S.C. § 1225(a)(1). In line with these cases, and as will be discussed in more detail below, Congress created a detention system where applicants for admission, including those who entered the country unlawfully, are detained for removal proceedings under § 1225 and foreign nationals who have been admitted to the country are detained under § 1226.

This background is critical here because the Court has confirmed that statutes denying bond during removal proceedings do not violate due process when such proceedings have a definite end point. *See Demore v. Kim*, 538 U.S. 510, 531 (2003) ("Detention during removal proceedings is a constitutionally permissible part of that process."); *see also Zadvydas v. Davis*, 533 U.S. 678, 701 (2001) (even after foreign national is ordered removed and detention may be indefinite, detaining him for up to 180 days is presumptively valid). Indeed, the Seventh Circuit has already rejected the argument that due process is violated by not affording a foreign national a bond hearing. *See Parra v. Perryman*, 172 F.3d 954, 958 (7th Cir. 1999). In *Parra,* the court of appeals held that the prospect of a foreign national ultimately avoiding removal was so remote that he had no liberty interest meriting protection:

> An alien in Parra's position can withdraw his defense of the removal proceeding and return to his native land, thus ending his detention immediately. He has the keys in his pocket. A criminal alien who insists on postponing the inevitable has no constitutional right to remain at large during the ensuing delay, and the United States has a powerful interest in maintaining the detention in order to ensure that removal actually occurs.

Parra, 172 F.3d at 958; see also *Velez-Lotero v. Achim*, 414 F.3d 776, 782 (7th Cir. 2005).

These cases mean there is no constitutional impediment to detaining petitioners during their

---

[2] This memorandum uses the term "foreign national" as equivalent to the statutory term of "alien" within the INA.

removal proceedings, and claims of such an entitlement can be plausible only where he may begin to endure unconstitutionally prolonged detention (such as where no prospect for deportation exists). *See, e.g.*, *Lopez Santos v. Clesceri*, No. 20 C 50349, 2021 WL 663180, at *3–7 (N.D. Ill. Feb. 19, 2021). The problem with analogizing petitioners' situation to such a case is that the only ongoing detention in this matter is Ambrosio's, and he has been detained for days while ICE reinstates his removal to Guatemala (as it has done with him in the past). It is therefore impossible to argue that detention pending such proceedings are now unconstitutionally prolonged or "indefinite." Hence, the Seventh Circuit's background precedent should control in this situation—meaning Ambrosio's detention is entirely lawful.

Further, Ambrosio has not submitted any evidence that he is being detained for any purpose beyond the resolution of his removal proceedings, or that he might be detained any longer than it might take to effect his removal to Guatemala. *Cf. Chaviano v. Bondi*, No. 25-cv-22451, 2025 WL 1744349, at *8 (S.D. Fla. June 23, 2025) (noting how hearings before an immigration court and opportunities for credible-fear interviews, together with a one-month detention, was not a sufficient basis for finding a due process violation, particularly where "detention, even for far longer periods, pending immigration proceedings" did not violate due process). And any argument that petitioners here "entered the United States," Pet. ¶ 8, is incorrect under the Supreme Court's decision that foreign nationals intercepted shortly after crossing the border are still considered to be "on the threshold" and have *only* the procedural rights that Congress has provided them by statute. *Thuraissigiam*, 591 U.S. at 140.

In this case, petitioners admittedly entered the country without inspection and, at this point, have been given notice of the charges against them, have access to counsel, may attend hearings with an immigration judge, can request bond at that time, and will have the right to appeal the

denial of any request for bond. *See* 8 U.S.C. § 1362. The fact that they might not want to appeal any potentially adverse bond order by an immigration judge through the procedures provided by Congress do not make those procedures constitutionally deficient. *See Thuraissigiam*, 591 U.S. at 138–40. Instead, petitioners' only plausible challenge to their detention is that they were detained under the wrong statute, which, even if true, would make that detention unlawful, but it would not make it unconstitutional. *See id.*; *cf. also Al-Shabee v. Gonzales*, 188 F. App'x 333, 339 (6th Cir. 2006) (Petitioner's "disagreement with the Immigration Judge's order, however, does not constitute a violation of the Due Process Clause"). Therefore, the court should reject petitioners' due process claim.

E. Alternatively, Petitioners Were Properly Detained Under 8 U.S.C. § 1225(b)(2).

Turning to petitioners' statutory claim under the INA, Pet. ¶¶ 46–48, the court should also hold that petitioners were properly detained under § 1225(b)(2) because they unambiguously meet every element in the text of the statute and, even if the text were ambiguous, the structure and history of the statute support respondents' interpretation. The statute here, 8 U.S.C. § 1225(b)(2)(A), is simple and unambiguous:

> Subject to subparagraphs (B) and (C) [not relevant here], in the case of an alien who is an applicant for admission, if the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained for a proceeding under section 1229a of this title.

8 U.S.C. § 1225(b)(2)(A). Even with its definitions, 8 U.S.C. §§ 1101(a)(13)(A) and 1225(a)(1), it is only three sentences long. The first relevant term is "applicant for admission," which is statutorily defined. *See* 8 U.S.C. § 1225(a)(1). The statute deems any foreign national "present in the United States who has not been admitted" to be an "applicant for admission." 8 U.S.C. § 1225(a)(1). Thus, under its plain terms, all unadmitted foreign nationals in the United States are "applicants for admission," regardless of their proximity to the border, the length of time they have

been present here, or whether they ever had the subjective intent to properly apply for admission. *See id.* While this may seem like a counterintuitive way to define an "applicant for admission," "[w]hen a statute includes an explicit definition, [courts] must follow that definition, even if it varies from a term's ordinary meaning." *Digital Realty Tr., Inc. v. Somers*, 583 U.S. 149, 160 (2018) (cleaned up). Thus, under the plain text of the statute, petitioners are unambiguously "applicants for admission" because they are foreign nationals, who were not admitted, and were present in the United States when apprehended. *See* Petr. Mem. at 1.

The next relevant portion of the statute is whether an examining immigration officer determined that petitioners were "seeking admission." *See* 8 U.S.C. § 1225(b)(2)(A). The INA defines "admission" as "the lawful entry of the alien into the United States after inspection and authorization by an immigration officer." 8 U.S.C. § 1101(a)(13)(A). Therefore, the inquiry is whether an immigration officer determined that petitioners were seeking a "lawful entry." *See id.* A foreign national's past unlawful physical entry has no bearing on this analysis. *See id.* This element of "lawful entry" is important here for two reasons. First, a foreign national cannot legally be admitted into the United States without a lawful entry. *See* 8 U.S.C. §§ 1101(a)(13), 1225(a)(3); *see also Sanchez v. Mayorkas*, 593 U.S. 409, 411–12 (2021); *Gomez v. Lynch*, 831 F.3d 652, 658 (5th Cir. 2016) (distinguishing "admission," which is "an occurrence" where an individual "presents himself at an immigration checkpoint" and gains entry, with status, which "describes [an individual's] type of permission to be present in the United States"). Second, a foreign national cannot *remain* in the United States without a lawful entry because a foreign national is removable if he did not enter lawfully. *See* 8 U.S.C. § 1182(a)(6). Indeed, one of the charges of removal against petitioners is based on their admittedly unlawful entry. Pet. ¶ 2. So, unless petitioners obtain a lawful admission in the future, they will be subject to removal in perpetuity. *See* 8 U.S.C.

§§ 1101(a)(13), 1182(a)(6).

The INA provides two examples of foreign nationals who are not "seeking admission." The first is someone who withdraws his application for admission and "depart[s] immediately from the United States." 8 U.S.C. § 1225(a)(4); *see also Matushkina v. Nielsen* 877 F.3d 289, 291 (7th Cir. 2017) (providing a relevant example of this phenomenon). The second is someone who agrees to voluntarily depart "in lieu of being subject to proceedings under § 1229a . . . or prior to the completion of such proceedings." 8 U.S.C. § 1229c(a)(1). This means even in removal proceedings, a foreign national can concede removability and accept removal, in which case he will no longer be "seeking admission." 8 U.S.C. § 1229a(d). Foreign nationals present in the United States who have not been lawfully admitted and who do not agree to immediately depart are seeking lawful entry and must be referred for removal proceedings under § 1229a. *See* 8 U.S.C. §§ 1225(a)(1), (b)(2)(A). In removal proceedings, if an unlawfully admitted foreign national does not accept removal, he can seek a lawful admission. *See, e.g.*, 8 U.S.C. § 1229b. Accordingly, Miguel is still "seeking admission" under § 1225(b)(2) because he has not agreed to depart, he has not yet conceded his removability or allowed his removal proceedings to play out—he wants to be admitted via his removal proceedings. *See Thuraissigiam*, 591 U.S. at 108–09 (discussing how an "alien present in the United States who has not been admitted or who arrives in the United States (whether or not at a designated port of arrival)" is deemed "an applicant for admission").

The court should likewise reject any argument that petitioners are not "seeking admission" as it is not a reasonable interpretation of § 1225(b)(2)'s text. *See* Petr. Mem. at 6. This is because petitioners ignore how they have not agreed to immediately depart, so logically they must be seeking to remain in this country, which (for them) still requires an "admission" (which is, as discussed above, a lawful entry). It also defies the legal presumption created by the definition of

"applicant for admission," which characterizes *all* unlawfully present foreign nationals as applying for admission until they are either removed or successfully obtain a lawful entry, regardless of their own intent. *See* 8 U.S.C. § 1225(a)(1).

The final textual requirement here is that petitioners "be detained for a proceeding under section 1229a of this title." 8 U.S.C. § 1225(b)(2)(A). In this case, the petitioners are not in expedited removal and have been placed in full removal proceedings where they will receive the benefits of the procedures (motions, hearings, testimony, evidence, and appeals) provided in § 1229a. Therefore, they also meet this element within § 1225(b)(2)(A)'s text. "Where the language is plain and admits of no more than one meaning, the duty of interpretation does not arise, and the rules which are to aid doubtful meanings need no discussion." *Caminetti v. United States*, 242 U.S. 470, 485 (1917). This principle applies even where a petitioner contends that the plain application of the statute would lead to a harsh result. *See, e.g.*, *Jay v. Boyd*, 351 U.S. 345, 357 (1956) (courts "must adopt the plain meaning of a statute, however severe the consequences"). Therefore, no further exercise in statutory interpretation is necessary or permissible in this case and the court should conclude that petitioners' detention under § 1225(b)(2) was lawful.

To the extent the court finds § 1225(b)(2)(A)'s text potentially ambiguous or is interested in policy arguments against the Board of Immigration Appeals' ("BIA") recent decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025), those arguments are equally meritless. See Petr. Mem. at 6–8. First, it is important to note that not all decisions have been resolved against the government on the issue of properly interpreting 8 U.S.C. § 1225(b)(2). *Compare* Petr. Mem. at 8 (listing cases), *with Chavez v. Noem*, — F. Supp. 3d —, 2025 WL 2730228, at *4–5 (S.D. Cal. Sept. 24, 2025); *Pena v. Hyde*, No. 25-cv-11983, 2025 WL 2108913, at *2 (D. Mass. July 28, 2025) ("Because petitioner remains an applicant for admission, his detention is authorized so long

as he is 'not clearly and beyond doubt entitled to be admitted' to the United States." (quoting 8 U.S.C. § 1225(b)(2)(A))); *and Florida v. United States*, 660 F. Supp. 3d 1239, 1274–75 (N.D. Fla. 2023).

As the Supreme Court itself has previously explained, applicants for admission "fall into one of two categories, those covered by § 1225(b)(1) and those covered by § 1225(b)(2)." *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018). "Read most naturally, §§ 1225(b)(1) and (b)(2) . . . mandate detention of applicants of admission until certain proceedings have concluded." *Id.* at 297. Despite the clear direction from the Supreme Court, petitioners (along with the cases they cite) argue that there is some third category of applicants for admission who are not subject to mandatory detention. *See* Petr. Mem. at 7–8. Section 1225(b)(1) covers which applicants for admission, including arriving aliens or foreign nationals who have not been admitted and have been present for less than two years, and directs that both of those classes of applicants for admission are subject to expedited removal. 8 U.S.C. § 1225(b)(1). Section 1225(b)(2) "serves as a catchall provision that applies to all applicants not covered by 1225(b)(1) (with specific exceptions not relevant here)."[3] *Jennings*, 583 U.S. at 287. And *Jennings* recognized that 1225(b)(2) mandates detention. *Id.* at 297; *see also Matter of Li*, 29 I. & N. Dec. 66, 69 (BIA 2025) ("[A]n applicant for admission . . . whether or not at a port of entry, and subsequently placed in removal proceedings is detained under . . . 8 U.S.C. § 1225(b), and is ineligible for any subsequent release on bond."). Thus, § 1225(b) should apply to petitioners here because they are present in the United States without being admitted and are thus still applicants for admission. *See Yajure Hurtado*, 29 I. & N. Dec. at 221.

---

[3] The two exceptions are crewmen and stowaways. *See* 8 U.S.C. §§ 1225(a)(2), 1281, and 1282(b). Neither is relevant to this case.

Any argument that "seeking admission" limits the scope of § 1225(b)(2)(A) is unpersuasive. Courts "interpret the relevant words not in a vacuum, but with reference to the statutory context, 'structure, history and purpose.'" *Abramski v. United States*, 573 U.S. 169, 179 (2014) (quoting *Maracich v. Spears*, 570 U.S. 48, 76 (2013)). The BIA has long recognized that "many people who are not actually requesting permission to enter the United States in the ordinary sense are nevertheless deemed to be 'seeking admission' under immigration laws." *Matter of Lemus-Losa*, 25 I. & N. Dec. 734, 743 (BIA 2012). Statutory language "is known by the company it keeps." *McDonnell v. United States*, 579 U.S. 550, 569 (2016). The phrase "seeking admission" in § 1225(b)(2)(A) must be read in the context of "applicant for admission" in § 1225(a)(1). Applicants for admission includes arriving aliens and foreign nationals present without admission. *See* 8 U.S.C. § 1225(a)(1). Both are understood to be "seeking admission" under §1225(a)(1). *See Lemus-Losa*, 25 I. & N. at 743. Congress made clear that all foreign nationals "who are applicants for admission or otherwise seeking admission" to be inspected by immigration officers. 8 U.S.C. § 1225(a)(3). The word "or" here "introduce[s] an appositive–a word or phrase that is synonymous with what precedes it ('Vienna or Wien,' 'Batman or the Caped Crusader')." *See United States v. Woods*, 571 U.S. 31, 45 (2013).

Petitioners' preferred interpretation reads "applicant for admission" out of 1225(b)(2)(A). "[O]ne of the most basic interpretive canons" instructs that a "statute should be construed so that effect is given to all its provisions." *Corley v. United States*, 556 U.S. 303, 314 (2009). "Applicant" is defined as "[s]omeone who requests something; a petitioner, such as a person who applies for letters of administration." *Black's Law Dictionary* (12th ed. 2024). Applying the definition of "applicant" to "applicant for admission," an applicant for admission is a foreign national "requesting" admission, defined by statute as "the lawful entry of the alien into the United States

after inspection." 8 U.S.C. § 1101(a)(13)(A). With this definition in mind, "seeking admission" does not have a different meaning from applicant for admission ("requesting admission"); the terms within § 1225(b)(2)(A) are thus synonymous.

This reading also comports with one of the central purposes behind Illegal Immigration Reform and Immigrant Responsibility Act of 1996 ("IIRIRA")—which was to stop treating foreign nationals who had evaded immigration authorities better than foreign nationals who correctly applied for admission at ports of entry. *See, e.g.*, *Hing Sum v. Holder*, 602 F.3d 1092, 1100 (9th Cir. 2010). The "IIRIRA amendments sought to ensure sensibly enough, that those who enter the country illegally, without proper inspection, are not treated more favorably under the INA than those who seek admission through proper channels, but are denied access." *Wilson v. Zeithern*, 265 F. Supp. 2d 628, 631 (E.D. Va. 2003). Petitioners' reading of the statute ignores the context and purpose of IIRIRA in the treatment of foreign nationals present without inspection. *See Norfolk & W. Ry. Co. v. Am. Train Dispatchers Ass'n*, 499 U.S. 117, 129 (1991) (noting that interpretive canons must yield "when the whole context dictates a different conclusion); *see also U.S. Nat'l Bank of Or. v. Indep. Ins. Agents of Am., Inc.*, 508 U.S. 439, 455 (1993) ("In expounding a statute, we must not be guided by a single sentence or member of a sentence, but look to the provisions of the whole law, and to its object and policy.").

II. There Is No Showing of Imminent, Irreparable Harm Here.

This court should also deny petitioners' motion because they cannot carry their burden to show that they are likely to suffer imminent, irreparable harm. *See Int'l Union, Allied Indus. Workers of Am., AFL–CIO v. Local Union No. 589*, 693 F.2d 666, 674 (7th Cir. 1982). Petitioners here hitch this prong to two things: (1) their legal arguments, and (2) the concept that their detention is inherently harmful. *See* Petr. Mem. at 10–11. But these arguments should fail in this case because their legal arguments are (as discussed above) meritless, and the detentions here

either no longer exist or will be done with soon enough.

Start with Alvarez and the children. Petitioners' motion points to the "physical and mental harm" suffered by those in detention but forgets that Alvarez and the children are no longer being detained here. Petr. Mem. at 11; *see also* Exhibit F (releasing Alvarez and the children from detention). As for Ambrosio and the pending execution of his removal order(s), such a relatively brief detention in order to effect that removal is not "irreparable" here because respondents intend to release him in the very near future—to Guatemala. *Cf. Thuraissigiam*, 591 U.S. at 119 ("While respondent does not claim an entitlement to release, the Government is happy to release him—provided the release occurs in the cabin of a plane bound for Sri Lanka.").

III. The Balance of Equities and the Public Interest Favor Respondents.

The balance of equities and public interest factors "merge when the Government is the opposing party." *Nken v. Holder*, 556 U.S. 418, 435 (2009). A court "'should pay particular regard for the public consequences'" of injunctive relief. *Winter*, 555 U.S. at 24 (quoting *Weinberger v. Romero-Barcelo*, 456 U.S. 305, 312 (1982)). Here again, petitioners' motion hitches the balancing of harms to their legal arguments. *See* Petr. Mem. at 12. Petitioners even go so far as to argue that respondents' interest in vindicating Congress's wish to mandatorily detain foreign nationals who have surreptitiously made their way into this country is "de minimis." *Id.* But "[c]ontrol over immigration is a sovereign prerogative" reserved for the political branches and not the courts. *El Rescate Legal Servs., Inc. v. EOIR*, 959 F.2d 742, 750 (9th Cir. 1992). And sovereignty is also why the public's interest in enforcing immigration laws is significant. *See United States v. Martinez-Fuerte*, 428 U.S. 543, 556–58 (1976). This same public interest would not be served by having courts commandeer this power by managing how bond hearings are adjudicated while an immigration judge is still deciding whether petitioners should be removed from this country.

Finally, this court may grant preliminary injunctive relief only if a movant "gives security in an amount that the court considers proper to pay the costs and damages sustained by any party found to have been wrongfully enjoined." Fed. R. Civ. P. 65(c). Rule 65(c) thus makes some form of security mandatory as a general rule in the Seventh Circuit, *see Gateway E. Ry. Co. v. Terminal R.R. Ass'n of St. Louis*, 35 F.3d 1134, 1141 (7th Cir. 1994), although a court may forgo a bond when "a bond that would give the opposing party absolute security against incurring any loss from the injunction would exceed the applicant's ability to pay . . . ." *Habitat Educ. Ctr. v. U.S. Forest Serv.*, 607 F.3d 453, 458 (7th Cir. 2010). The risk of harm to respondents here is not insubstantial, and if the court grants their motion, respondents request that the court require that petitioners post a security bond during the pendency of the court's order, in the event it is later determined that respondents were (or have been) wrongfully enjoined. *See id.* (reasoning that the government "may lose money as a result of the" preliminary injunction obtained against it). Indeed, if the court grants preliminary injunctive relief, that risks mooting the entire case and preventing respondents from even appealing an adverse ruling on a matter of public importance.

Conclusion

For the foregoing reasons, the court should deny both the petition and petitioners' motion.

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

By: s/ Joshua S. Press
JOSHUA S. PRESS
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 886-7625
joshua.press@usdoj.gov