

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RAMIRO CABRERA, )  
 )  
 Petitioner, )  
 ) No. 25 C 12160  
 v. )  
 ) Judge Kennelly  
 KRISTI NOEM, in her official capacity as )  
 Secretary of Homeland Security, *et al.*, )  
 )  
 Respondents. )

**STATUS REPORT AND AGREED MOTION  
TO PARTIALLY ALTER ADMINISTRATIVE STAY**

Respondents' counsel is aware of this matter and this court's minute order from yesterday that requires "respondents' counsel . . . to file a status report setting out the current location of the petitioner." Dkt. 4. To that end, respondents report that the petitioner is still being detained at U.S. Immigration and Customs Enforcement's ("ICE") Broadview facility in Broadview, Illinois. Since the entry of that order, though, the parties' counsel have conferred and *agreed* that petitioner should be allowed to be detained in either Wisconsin or Indiana.<sup>1</sup> This is because ICE's Broadview facility was never intended or designed for longer-term detention, and due to the fact that the Illinois TRUST Act does not allow for state-detention facilities to cooperate with the federal government in housing detained migrants awaiting their removal proceedings. Other courts in this

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<sup>1</sup> Such transfers to out-of-state facilities stem from the Illinois TRUST Act, which was enacted in 2017 to prohibit state law enforcement officials from participating in federal civil immigration enforcement. *See* TRUST Act, 5 Ill. Comp. Stat. 805/1 *et seq.* (2017). The TRUST Act was also amended in 2021 by the Way Forward Act, to, *inter alia*, prevent state and local law enforcement officials from entering into agreements to detain individuals for federal civil immigration violations. *See id.* at 805/15(g). In combination, the Way Forward Act and the TRUST Act limit cooperation with federal enforcement in numerous ways, including limiting the detention options for foreign nationals within the State of Illinois.

district have entered similar orders. *See Hernandez Lopez v. Olson*, 25 C 10145, Dkt. 10 (N.D. Ill. Aug. 27, 2025) (“The Emergency Order entered on August 26, 2025, . . . is extended through the disposition of petitioner’s motion for temporary restraining order, . . . and is modified to allow petitioner to be housed not only in the State of Illinois, but also the States of Indiana and Wisconsin[.]”). Respondents therefore request that this court partially alter its administrative stay to allow ICE to also house the petitioner in either Wisconsin or Indiana.

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](mailto:joshua.press@usdoj.gov)