Keaton Elliot (Bar No. 38841-49)
Keaton@ChildrensLegalCenterChicago.org
Laura Smith (Illinois ARDC 6300907)
Laura@ChildrensLegalCenterChicago.org
Children's Legal Center
1100 W Cermak Rd., Suite 422
Chicago, Illinois 60608
(312) 722-6642

Attorneys for Petitioners

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

C.M.A.P and D.Y.A.P, minors, and B.Y.P.O., as Next Friend of minors

Petitioners/Plaintiffs,

v.

Angie SALAZAR, in her official capacity as Acting Director of the Office of Refugee Resettlement (ORR), Andrew GRADISON, in his official capacity as Acting Assistant Secretary for the Administration for Children and Families (ACF), Robert F. KENNEDY JR., in his official capacity as Secretary of the Department of Health and Human Services (HHS), Bridgette BROWN, in her official capacity as Federal Field Specialist, Office of Refugee Resettlement AND Sandra CEASAR, in her official capacity as the Federal Field Specialist Supervisor, Office of Refugee Resettlement, RONDA WEDEL in her official capacity as Director of BCS

Respondents/Defendants.

Case No.
1:25-cv-01006

PETITION FOR WRIT OF HABEAS CORPUS AND MANDAMUS RELIEF

INTRODUCTION

This is a petition for a writ of habeas corpus filed pursuant to 8 U.S.C. § 2241 on behalf of C.M.A.P. and D.Y.A.P. natives and citizens of Honduras, by and through their attorneys, seeking relief to remedy their unlawful detention by Respondents. This petition for a writ of mandamus is filed pursuant to pursuant to 28 U.S.C. § 1361 and the Administrative Procedure Act, 5 U.S.C. §§ 555(b) and 702, on behalf of C.M.A.P. and D.Y.A.P. to remedy their continued unlawful detention by Respondents. Petitioners hereby request that an immediate hearing be set on this matter. Petitioners also request that they be released during the pendency of this Petition. In support of this Petition, Petitioners allege the following:

CUSTODY

1. Petitioners are in the physical custody of Respondents, Angie SALAZAR, in her official capacity as Acting Director of the Office of Refugee Resettlement (ORR), Andrew GRADISON, in his official capacity as Acting Assistant Secretary for the Administration for Children and Families (ACF), Robert F. KENNEDY JR., in his official capacity as Secretary of the Department of Health and Human Services (HHS), Bridgette BROWN, in her official capacity as Federal Field Specialist, Office of Refugee Resettlement AND Sandra CEASAR, in her official capacity as the Federal Field Specialist Supervisor, Office of Refugee Resettlement in Indianapolis, Indiana. Petitioners are under the direct control of Respondents and their agents.

JURISDICTION

2. This action arises under the Constitution of the United States.

3. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause), and the Fifth Amendment to the United States Constitution (Due Process Clause), 28 U.S.C. § 1331, as they

arise under federal statutes, 28 U.S.C. § 2201 (Declaratory Judgment Act); 28 U.S.C. § 2241 (habeas corpus), and 28 U.S.C. § 1361 (writ of mandamus).

4. This Court has jurisdiction under 28 U.S.C. § 1331, as Petitioners are presently in custody under color of authority of the United States and such custody is in violation of the U.S. Constitution, laws, or treaties of the United States.

5. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et. seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All-Writs Act, 28 U.S.C. § 1651.

VENUE

6. Venue is proper because today, June 3, 2025, Petitioners are detained at an ORR Detention Center in Indianapolis, Indiana, which is within the jurisdiction of this District.

7. Venue is proper in this District because Respondents are officers, employees, or agencies of the United States and a substantial part of the events or omissions giving rise to Petitioners' claims occurred in this District and Petitioners reside in this District and no real property is involved in this action. 28 U.S.C. § 1391(e).

REQUIREMENTS OF 28 U.S.C. § 2243

8. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the Respondents "forthwith," unless the Petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require Respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).

9. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most

important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

10. Petitioner C.M.A.P. is a 14-year-old citizen of Honduras. DHS classified Petitioner as an unaccompanied minor (UAC) pursuant to 6 U.S.C. § 279. ORR has detained Petitioner in a juvenile detention facility since January 29, 2025. Petitioner is in the custody, and under the direct control, of Respondents and their agents at Bethany Cristian Services in Indianapolis, Indiana.

11. Petitioner D.Y.A.P. is a 13-year-old citizen of Honduras. DHS classified Petitioner as an unaccompanied minor (UAC) pursuant to 6 U.S.C. § 279. ORR has detained Petitioner in a juvenile detention facility since January 29, 2025. Petitioner is in the custody, and under the direct control, of Respondents and their agents at Bethany Cristian Services in Indianapolis, Indiana.

12. B.Y.P.O. ("Sponsor") is the biological mother of Petitioners and is the individual applying to ORR to be Petitioners' Sponsor and have Petitioners released to her custody. Pursuant to ORR Rule 2.2.1. Identification of Qualified Sponsors, B.Y.P.O. is a "Category 1: Parent or legal guardian."

13. Respondent Ronda Wedel is sued in her official capacity as the Director of Bethany Cristian Services (BCS). BCS is the facility in which Petitioners are being held and contracts with ORR to hold children in the custody of ORR.

14. Respondent Bridgette Brown is sued in her official capacity as an ORR Federal Field Specialist (FFS). Federal Field Specialists are the government officials responsible for the care and custody of children in ORR facilities. In this role, FFS Brown is responsible for

determining Petitioners' placement and has authority to approve their release to an appropriate sponsor's care. Respondent is a legal custodian of Petitioners.

15. Respondent Sandra Ceasar is sued in her official capacity as an ORR Federal Field Specialist Supervisor (FFS). Federal Field Specialist Supervisors are government officials responsible for the care and custody of children in ORR facilities and supervise Federal Field Specialists. In this role, FFS Supervisor Ceasar is responsible for determining Petitioners' placement and has authority to approve their release to an appropriate sponsor's care. Respondent is a legal custodian of Petitioners.

16. Respondent Angie Salazar is the Acting Director of ORR, the component of the U.S. Department of Health and Human Services (HSS) responsible for implementing HSS's obligations to unaccompanied minors who are immigrants. ORR is the government entity directly responsible for the detention of Petitioners and has the authority to release them. Respondent Salazar is sued in her official capacity. Respondent is a legal custodian of Petitioners.

17. Respondent Andrew Gradison is sued in his official capacity as the Acting Assistant Secretary for ACF. ACF is the operating division of HHS, is the agency responsible for the welfare of children and families and is comprised of 23 offices including ORR, the component agency responsible for Petitioners' detention and custody. Respondent is a legal custodian of Petitioners.

18. Respondent Robert F. Kennedy Jr. is sued in his official capacity and is the Secretary of HHS, which is comprised of his operating division ACF, and subsequently ORR, the component agency responsible for Petitioners' detention and custody. Respondent is a legal custodian of Petitioners.

STATEMENT OF FACTS

19. Petitioners entered the United States on or about January 27, 2025 and were designated UACs by DHS. On January 29, 2025, Petitioners were placed in ORR custody. Upon information and belief, in February 2025 B.Y.P.O. submitted the Family Reunification Packet (FRP) to ORR to have her biological children, Petitioners, released to her care.

20. On February 16, 2025, ORR completed a home study report which resulted in a positive recommendation that Petitioners be released to B.Y.P.O. and no additional recommendations were made on the report. Two days later on February 18, 2025, a positive sponsor suitability recommendation was completed recommending that Petitioners be released to the care of their biological mother B.Y.P.O.

21. On March 7, 2025, ORR amended Rule 2.2.4. The change "Updates the list of acceptable documents to verify identity. Reduces the types of documents that may be used for proof of address and reduces the timeframe from which those documents may be dated in some instances from 60 days to 30 days."[1] ORR did not publish the notice of rule change in the federal register and did not provide a notice-and-comment pursuant to 5 U.S.C. § 553(b)(A). The March 7, 2025 rule change provides:

> "List of Acceptable Documents:
> - U.S. Passport or U.S. Passport Card
> - Permanent Resident Card or Alien Registration Card (Form 1-551)
> - Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine-readable immigrant visa
> - Employment Authorization Document that contains a photograph (I-766)
> - Foreign passport with Form I-94 or Form I-94A with Arrival-Departure Record, and containing an endorsement to work
> - Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI

[1] *See* https://acf.gov/orr/policy-guidance/unaccompanied-children-program-policy-guide-record-posting-and-revision-dates at 2.2.4 Required Documents for Submission with the Application for Release

- Driver's license or ID card issued by a U.S. state or outlying possession of the United States provided it contains a photograph or information such as a name, date or birth, gender, height, eye color, and address
- ID card issued by U.S. federal, state or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address
- U.S. Military card or draft record
- U.S. Military dependent's ID card
- U.S. Coast Guard Merchant Mariner Card
- Native American tribal document
- Driver's license issued by a Canadian government authority"

22. On March 14, 2025 ORR amended their Field Guidance 27 ("FG 27") to expand the DNA testing requirement to biological parents (Category 1 Sponsors). Pursuant to FG 27, "once the TAR is submitted, appointments are generally able to be scheduled within 2 days."[2]

23. On March 18, 2025 the ORR Program holding Petitioners emailed Petitioners' counsel stating that "...sponsor is mother to both girls. We have documented proof of the relationship, and the Honduran consulate verified both the minors' birth certificates. The DNA will further verify the relationship. For context, **we have no concerns regarding any of the documents** provided. **We also have no current safety concerns regarding sponsor or the sponsor's household** based on the vetting efforts." (emphasis added).

24. However, on March 18, 2025 the ORR Program also emailed Petitioners' counsel that, "Changes to ORR policy have delayed the case, and we are no longer able to request release as of now. In policy 2.2.4., the list of IDs acceptable for proof of identification have drastically changed, and it does not appear the sponsor will be able to obtain one. We are working toward preparing for an exception, as noted in the new policy updates. '*For Category 1 Sponsors Only*: Any deviation from this requirement must be supported by clear justification and exceptions may be made on a case-by case basis by HHS ORR Headquarters.' I am also writing to notify you that

[2] https://acf.gov/sites/default/files/documents/orr/FG-27_-_DNA_Testing_Expansion.pdf

both minors and the sponsor will be undergoing DNA testing in accordance with FG 27: "The case manager must provide notice to the child's attorney of record, as applicable, that a DNA test is conducted." We will not be able to move forward with the exception process until this is completed, it appears."

25. On March 20, 2025 the ORR Program emailed Petitioners' counsel and stated that FFS/Respondent Brown provided guidance "to begin drafting an exception request (similar to a release request) and submit it once the DNA test results have been received. Unfortunately, we are not able to submit the request prior to having the DNA results. Only the ID requirements may potentially qualify for an exception with a category 1 case; the new DNA policy does not, apparently, provide for any exception."

26. On March 27, 2025, Petitioners' counsel emailed FFS Supervisor/Respondent Sandra Caesar. Respondent Caesar responded by reciting FG 27, and stating that if counsel has any further questions, an authorization for release of records should be executed.

27. On April 21, 2025 Petitioners and Sponsor completed DNA testing pursuant to ORR Field Guidance 27.

28. Upon information and belief, on May 27, 2025 Respondent CESAR instructed Respondent WEDEL to submit the matter for release of Minor's from ORR custody. On May 27, 2025 Respondent WEDEL submitted Minor's case to Respondent CESAR for release from ORR custody. On June 2, 2025 Respondent CESAR changed the directive and "remanded" the release, pausing the release of Minors from ORR custody.

29. Petitioners, minor children, have now been in federal custody and separated from their mother for 125 days, despite all positive recommendations and full compliance with ORR's additional requirements. The ongoing delay in scheduling DNA testing—well beyond the

timeframe outlined in ORR's own guidance—has resulted in continued, unnecessary detention and emotional distress for the minor children being separated from their mother.

LEGAL FRAMEWORK

30. Three key laws and agreements govern the federal government's treatment and custody of unaccompanied immigrant children: (1) the 1997 Flores Settlement Agreement; (2) the Homeland Security Act of 2002; and, (3) the Trafficking Victims Protection Reauthorization Act.

31. The Flores Settlement Agreement arose from a lawsuit filed by a group of immigrant children challenging their detention and seeking to be released to family members and/or sponsors within the United States. *See Flores v. Sessions*, 862 F.3d 863, 869 (9th Cir. 2017) (discussing the history of the Flores litigation); *see also Flores v. Sessions*, Case No. CV 85-4544-DMG (C.D. Cal., July 9, 2018) (affirming the terms of the Flores Settlement Agreement). In 1997, the plaintiff children entered into a consent decree with the federal government that created a nationwide policy governing the custody and release of immigrant children by immigration authorities and applies to this case. *Flores v. Reno*, No. CV 85-4544, Settlement Agreement ("Flores Settlement Agreement"). Among other things, the Agreement requires: (a) release without unnecessary delay, (b) release to an adult caregiver, with parents, legal guardians, and other family members given priority, and (c) placement in the "least restrictive setting" appropriate to the minor's needs. Flores Settlement Agreement, ¶¶ 11, 14.

32. At the time of the Flores Settlement Agreement, a single agency – the Immigration and Naturalization Service (INS) – administered the custody, detention, and deportation of immigrant children. In 2002, Congress passed the Homeland Security Act (HSA), which abolished the INS, created a new Department of Homeland Security, and transferred all functions related to the care and custody of unaccompanied immigrant children to ORR, a sub-department of the

Department of Health and Human Services. *See* Pub. L. 107-296, 116 Stat. 2153 (Nov. 25, 2002). Section 462 of the HSA extended the key terms of the Flores Settlement Agreement to all unaccompanied immigrant children, including the requirement that ORR place such children in the least restrictive setting. *Id.*

33. In 2008, Congress further strengthened protections for unaccompanied children through the Trafficking Victims Protection Reauthorization Act ("TVPRA"). *See* Pub. L. 110-457, 122 Stat. 5044 (Dec. 23, 2008). The TVPRA requires federal officials to screen these unaccompanied children for certain vulnerabilities, including whether they are victims of trafficking and whether they fear persecution in their home countries. *See* 8 U.S.C. § 1232(a)(4). The TVPRA also enacted procedures for ensuring "safe and secure placements" for these children. *See* 8 U.S.C. § 1232(c)(1). Like the Flores Settlement Agreement, the TVPRA mandates that an unaccompanied child "shall be promptly placed in the least restrictive setting that is in the best interest of the child." 8 U.S.C. § 1232(c)(2)(A).

34. In accordance with these Congressional procedural safeguards, ORR has a statutory responsibility to grant Sponsor's reunification request and place Petitioners in the least restrictive setting that is in their best interests.

35. The Flores Settlement Agreement, Homeland Security Act, and TVPRA provide ORR multiple placement options for unaccompanied children. Paragraph 14 of the Flores Settlement Agreement requires in relevant part:

> Where the INS [ORR] determines that the detention of the minor is not required either to secure his or her timely appearance before the INS or the immigration court, or to ensure the minor's safety or that of others, the INS [ORR] shall release a minor from its custody without unnecessary delay, in the following order of preference, to:
>
> a. a parent
> b. a legal guardian
> c. an adult relative (brother, sister, aunt, uncle, or grandparent);

> d. an adult individual or entity designated by the parent or legal guardian as capable and willing to care for the minor's well-being in a declaration signed under penalty of perjury before an immigration or consular officer....

See also 8 U.S.C. §§ 1232(c)(2)(A), 1232(c)(3) (codifying the Flores Settlement Agreement).

CLAIMS FOR RELIEF

COUNT ONE
Violation of 8 U.S.C. § 1232(c)(2) and (3)

36. Pursuant to 8 U.S.C. § 1232(c)(2), "an unaccompanied alien child in the custody of [HHS] shall be promptly placed in the least restrictive setting that is in the best interest of the child."

37. Pursuant to 8 U.S.C. § 1232(c)(3)(A), "Subject to the requirements of subparagraph (B), an unaccompanied alien child may not be placed with a person or entity unless the Secretary of Health and Human Services makes a determination that the proposed custodian is capable of providing for the child's physical and mental well-being. Such determination shall, at a minimum, include verification of the custodian's identity and relationship to the child, if any, as well as an independent finding that the individual has not engaged in any activity that would indicate a potential risk to the child."

38. Pursuant to 1232(c)(3)(B) provides, "Before placing the child with an individual, the Secretary of Health and Human Services shall determine whether a home study is first necessary."

39. Respondents have verified that Sponsor meets the requirements set forth in §§ 1232(c)(2) and (3). *Id.* On March 18, 2025 Respondents stated that "...sponsor is mother to both girls. We have documented proof of the relationship, and the Honduran consulate verified both the minors' birth certificates. The DNA will further verify the relationship. For context, **we have no**

concerns regarding any of the documents provided. **We also have no current safety concerns regarding sponsor or the sponsor's household** based on the vetting efforts." (emphasis added).

40. Despite a positive Home Study, positive sponsor suitability recommendation, completion of DNA testing and no safety concerns regarding the Sponsor, Petitioners face continued detention because of the new ORR Unaccompanied Alien Children Bureau Policy Guide: Section 2.2.4 and the newly expanded F.G. 27. Petitioners have been unjustly detained and separated from their mother/Sponsor for 87 days, further condemning Petitioners to indefinite detention.

41. The prolonged detention of Petitioners is inflicting devastating trauma at a young age and violates the TVPRA requirement that children be "promptly placed in the least restrictive setting that is in the best interest of the child". 8 U.S.C. § 1232(c)(2). This grievous harm caused by Petitioners' prolonged detention at the hands of the government is ongoing, as are the violations of Petitioners' constitutional, statutory, and other legal rights.

42. Respondents have failed to act promptly.

43. ORR's ongoing and prolonged detention of Petitioners bears no reasonable relation to any government purpose. Petitioners have committed no crime and are not a danger to anyone. Their mother/Sponsor has demonstrated herself as a capable, and willing sponsor to care for her children, according to the requirements of law.

44. Moreover, Sponsor is in fact capable, proper, and fit, and Petitioners present no flight risk. Petitioners should be released into the care and custody of Sponsor.

45. Respondents are holding Petitioners C.M.A.P. and D.Y.A.P. in federal custody, in violation of the Flores Settlement Agreement, federal statutes, and the U.S. Constitution.

46. Accordingly, Petitioners seek a writ of habeas corpus compelling Respondents to release Petitioners to the custody and care of Sponsor.

COUNT TWO
Violation of *Flores* Settlement

47. Petitioners re-allege and incorporate by reference the paragraphs above as though fully set forth herein.

48. The Flores Settlement Agreement authorizes any minor who disagrees with ORR's placement or custodial determination to seek review in "any United States District Court with jurisdiction and venue over the matter to challenge that placement determination . . ." Flores Settlement Agreement, ¶ 24B.

49. The standard of review for placement decisions is "de novo." *Id.* at ¶ 24C.

50. As unaccompanied minors, Petitioners are members of the *Flores* class and are therefore authorized to challenge Respondents' custodial decision in this Court.

51. Respondents' continued incarceration of Petitioners is a violation of the *Flores* Settlement Agreement.

COUNT THREE
Violation of the Section 235 of the TVPRA, 8 U.S.C. § 1232

52. Petitioners re-allege and incorporate by reference the paragraphs above as though fully set forth herein.

53. Respondents have a non-discretionary duty to promptly place Petitioners in the least restrictive setting that is in their best interests. 8 U.S.C. § 1232(c)(2)(A).

54. Respondents failed to act promptly.

55. Respondents have arbitrarily and unlawfully failed to place Petitioners in the least restrictive setting that is in their best interest.

56. Accordingly, Respondents have violated Section 235 of the TVPRA, 8 U.S.C. § 1

COUNT FOUR
Violaton of 5th Amendment Right to Due Process

57. Petitioners re-allege and incorporate by reference the paragraphs above as though fully set forth herein.

58. The substantive component of the Due Process Clause of the Fifth Amendment provides that individuals shall not be deprived of "life, liberty, or property, without due process of law." U.S. Const. Amendment 5. Petitioners have a substantive liberty interest to be released from ORR detention and reunified with their biological mother.

59. Respondents' policies and actions, as set forth above, have infringed upon Petitioners' substantive liberty interest in being free from confinement, and in family integrity. These policies and actions have caused a period of prolonged confinement in detention facilities without any government need, resulting in substantial harm to young children.

60. For these reasons, Petitioners' prolonged detention violates the Due Process Clause of the 5th Amendment.

COUNT FIVE
Violation of the Administrative Procedures Act

61. Petitioners re-allege and incorporate by reference the paragraphs above as though fully set forth herein.

62. Respondents' detainment of and failure to release Petitioners constitutes final agency action.

63. Respondents' detention of Petitioners and their failure to release Petitioners to a fit sponsor is arbitrary, capricious, and not in accordance with the law, ignoring the mandate of the *Flores* Settlement Agreement.

64. The amendment to ORR 2.2.4. and expansion of F.G. 27 is arbitrary, capricious, and not in accordance with the law, ignoring the mandate of the *Flores* Settlement Agreement.

65. The amendment to ORR 2.2.4. and expansion of F.G. 27 violates 5 U.S.C. § 553(b)(A).

66. The agency's action determined the rights of Petitioners and has the legal consequence of continued detainment, depriving Petitioners of their fundamental right to family integrity. Accordingly, Petitioners are entitled to judicial review of ORR's actions under 5 U.S.C. § 704.

67. Petitioners have exhausted all administrative remedies available to them as of right.

68. Petitioners have no recourse to judicial review other than by this action.

COUNT SIX
Violation of the Mandamus Act, 28 U.S.C. § 1361

69. Petitioners re-allege and incorporate by reference the paragraphs above as though fully set forth herein.

70. Mandamus is available to compel a federal official or agency to perform a duty if: (1) there is a clear right to the relief requested; (2) defendant has a clear, non-discretionary duty to act; and (3) there is no other adequate remedy available. *See* 28 U.S.C. § 1361.

71. Petitioners fall within the zone of interest protected by the TVPRA. They have the statutory right to be "promptly placed in a least restrictive setting that is in their best interest." 8 U.S.C. § 1232(c)(2).

72. Respondents have a nondiscretionary duty place Petitioners in a "least restrictive setting that is in their best interest." 8 U.S.C. § 1232(c)(2).

73. There are no other adequate remedies available to Petitioners to obtain release

from ORR custody.

74. Petitioners are entitled to relief in the nature of mandamus pursuant to 28 U.S.C. § 1361 to compel Respondents to promptly release Petitions to the care of their biological mother/Sponsor.

PRAYER FOR RELIEF

Petitioners pray that the Court assume jurisdiction over this Petition and Complaint and grant the following relief:

I. Issue a Writ of Habeas Corpus and Mandamus compelling Respondents to release Petitioners to the custody and care of Sponsor.

II. A declaration that Respondents have violated Petitioners' constitutional and statutory rights.

III. An injunction compelling Petitioners' placement in the custody of Sponsor as required by federal statutes, the Flores Settlement Agreement, and the U.S. Constitution;

IV. An award of attorney's fees and costs to the extent permitted by law, including but not limited to the Equal Access to Justice Act, 5 U.S.C. § 504, 28 U.S.C. § 2412; and,

V. Any other relief the Court deems just and proper.

Dated: June 3, 2025

Respectfully submitted,

/s/ Keaton Elliott
Attorney for Petitioners

Keaton Elliot (Bar No. 38841-49)
Keaton@ChildrensLegalCenterChicago.org
Laura Smith (Illinois ARDC 6300907)

Laura@ChildrensLegalCenterChicago.org
Children's Legal Center
1100 W Cermak Rd., Suite 422
Chicago, Illinois 60608
(312) 722-6642

Attorneys for Petitioners