



National Immigrant Justice Center

DATE

Officer X
Department of Homeland Security
Immigration and Customs Enforcement
101 W. Congress, 4th Floor
Chicago, IL 60605
VIA FAX: 312-356-4518

CC: Supervisor X

RE: Grant of Withholding of Removal for and Continued Detention of X, Axxx-xxx-xxx

Dear Officer X:

I am following up to our phone conversation that we had on X, in regards to the continued detention of my client, X. As you know, on X date, Immigration Judge X granted withholding of removal to X. *See* Tab A. Despite this grant of withholding more than X days ago, Immigration and Customs Enforcement (ICE) continues to detain X at McHenry County Jail. Pursuant to the March 6, 2012 ERO Field Guidance Reminder entitled "Reminder on Detention Policy Where an Immigration Judge Has Granted Asylum, Withholding of Removal or CAT", my client should be released from ICE custody. *See* Tab B.

Per our conversation, I understand that ICE seeks to examine the possibility of deporting X to a third country. Other than ties to his homeland of Country X, X has no relations or connections to any other country, nor has he established residency in another country. Furthermore, during removal proceedings, the Immigration Judge did not designate any other country other than X home country, Country X, as a country of removal. In short, there is no third country to which X can be deported.

I respectfully request that X's case be reviewed expeditiously, and that he be released from ICE custody. As he has been granted protection from removal and pursuant to the March 2012 Field Guidance policy, X's continued detention has ceased to be either reasonable or necessary and he should be immediately released from ICE custody.

Thank you in advance for your consideration of this request. If you have further questions or require additional information, please do not hesitate to contact me at 312.660.1379. I look forward to hearing from you as soon as possible.

Sincerely,

Name
Signature

Enclosure