

Good morning, Officers,

My name is ATTORNEY NAME, and I am an attorney with the National Immigrant Justice Center (NIJC). I represent **CLIENT NAME, A#XXX-XXX-XXX**. Attached please find my G-28.

I understand from the ORR shelter where CLIENT is currently detained — SHELTER NAME — that his family reunification case will not be complete by the time he turns 18, which is **DATE**. Consequently, I am writing to urgently request that ICE release CLIENT on his own recognizance to his PARENT/OTHER RELATIVE/SPONSOR in Chicago. Please consider CLIENT for placement in the least restrictive setting available, as required by 8 U.S.C. § 1232(c)(2)(B). Additionally, please make alternatives to detention available to CLIENT, which may include placement with an individual or organizational sponsor, or in a supervised group home. In CLIENT's case, the least restrictive setting is with his PARENT/OTHER RELATIVE/SPONSOR at the following address:

ADDRESS

In support of this request, please find attached NIJC's letter of support for CLIENT's release, which includes all necessary information regarding his post-18 plan, and the order from the U.S. District Court for the District of Columbia in the class action *Garcia-Ramirez v. ICE*. Said order states that ICE must comply with 8 U.S.C. § 1232(c)(2)(B) in the placement of similarly situated teenagers; therefore, CLIENT should be released to his PARENT/OTHER RELATIVE/SPONSOR, which is the least restrictive setting available to him.

Please let me know if you have any questions or concerns, and thank you so much for your consideration of this request. If you need to speak with me regarding this case, please call me at XXX-XXX-XXXX.

Sincerely,
ATTORNEY NAME