

FILED
10-07-2025
CLERK OF WISCONSIN
SUPREME COURT

IN THE SUPREME COURT OF WISCONSIN

NO. 2025AP002121

VOCES DE LA FRONTERA, INC.,

Petitioner,

v.

DAVE GERBER, IN HIS OFFICIAL CAPACITY AS SHERIFF OF WALWORTH COUNTY; TODD J. DELAIN, IN HIS OFFICIAL CAPACITY AS SHERIFF OF BROWN COUNTY; CHAD BILLEB, IN HIS OFFICIAL CAPACITY AS SHERIFF OF MARATHON COUNTY; DAVID ZOERNER, IN HIS OFFICIAL CAPACITY AS SHERIFF OF KENOSHA COUNTY; AND CHIP MEISTER, IN HIS OFFICIAL CAPACITY AS SHERIFF OF SAUK COUNTY,

Respondents.

**APPENDIX TO NON-PARTY BRIEF OF THE AMERICAN CONSTITUTIONAL
RIGHTS UNION
IN OPPOSITION TO VOCES DE LA FRONTERA, INC.'S PETITION TO THE
SUPREME COURT TO TAKE JURISIDCTION OF AN ORIGINAL ACTION**

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CERTIFICATE OF COMPLIANCE WITH RULE 809.19(2)(a), (am)

I hereby certify that filed with this brief is a separate appendix that complies with Wis. Stat. § 809.19(2)(1) and (am) and that contains, at a minimum:

1. A Table of Contents; and
2. A copy of any unpublished opinion.

I further certify that if the record is required by law to be confidential, the portions of the record included in the appendix are reproduced using the first names and last initials instead of full names or persons, specifically including juveniles, with a notation that the portions of the record have been so reproduced to preserve confidentiality and with appropriate references to the record.

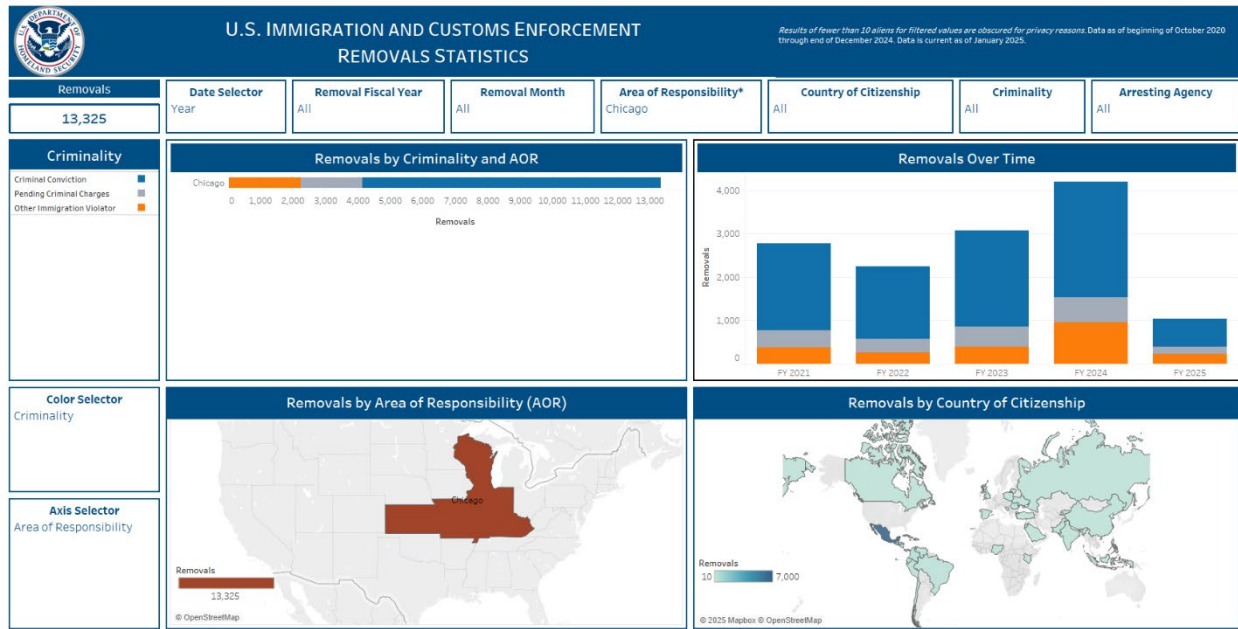
Dated: October 7, 2025.

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Exhibit 1



Taken from ICE.gov/statistics. Accessed October 6, 2025.

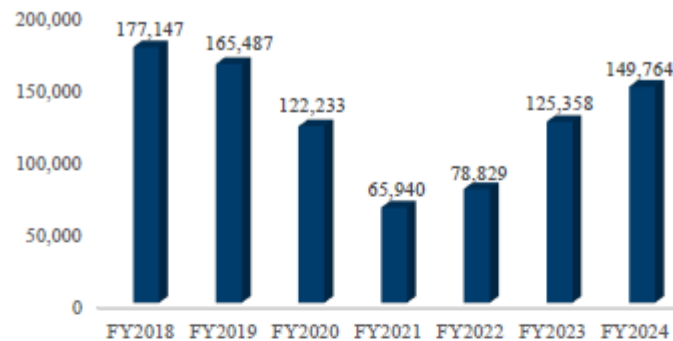
Exhibit 2

Figure 11. FY 2019 – FY 2024 ERO Detainers Issued¹³

In FY 2024, ERO issued 149,764 detainers for noncitizens with criminal histories, an increase of 19.5% from FY 2023, when ERO issued 125,358 detainers. During FY 2024, ERO issued detainers to noncitizens with convictions and charges for numerous serious criminal activities, including 80,854 assaults; 21,379 sexual assault and sex offenses; 19,409 weapons offenses; 19,248 burglaries; 7,904 robberies; 4,541 kidnappings; and 4,085 homicides.

Custody and Case Management

ERO manages the detained and non-detained dockets from initial book-in to final case disposition (and removal, if applicable). Although ERO's detained population is limited due to congressional funding for ERO's detention beds, the non-detained population has grown significantly, driven primarily by increased migration at the Southwest Border. At the end of FY 2024, ICE managed more than 7.6 million noncitizens in removal proceedings or subject to final orders of removal on the agency's non-detained docket. In addition, in FY 2024, ERO provided for the safety, security and care for nearly 278,000 noncitizens who entered into ERO custody over the course of the fiscal year. Additionally, ERO transports noncitizens between detention facilities, to and from medical appointments, to relieve overcrowding along the Southwest Border, and to stage those who have received final orders of removal.

Taken from U.S. Immigration and Customs Enforcement, FY24, P. 21,
<https://www.ice.gov/doclib/eoy/iceAnnualReportFY2024.pdf>.