

JS 44 (Rev. 03/24)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p>I. (a) PLAINTIFFS</p> <p style="text-align: center;">Ayman Soliman</p> <p>(b) County of Residence of First Listed Plaintiff <u>Hamilton County, Ohio</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys (Firm Name, Address, and Telephone Number) Robert A. Ratliff, Brennan, Manna and Diamond, LLC 200 Public Square, Suite 1850, Cleveland, OH 44114 (216) 658-2323</p>	<p style="text-align: center;">DEFENDANTS</p> <p style="text-align: center;">Todd M. Lyons, Acting Director, DHS-ICE</p> <p>County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known) _____</p>
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<p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input checked="" type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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IV. NATURE OF SUIT <i>(Place an "X" in One Box Only)</i>					Click here for: Nature of Suit Code Descriptions.
<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury - Medical Malpractice</p>	<p>PERSONAL INJURY</p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p>PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p>FORFEITURE/PENALTY</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 690 Other</p> <p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Management Relations</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 751 Family and Medical Leave Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Employee Retirement Income Security Act</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>INTELLECTUAL PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application</p> <p><input type="checkbox"/> 840 Trademark</p> <p><input type="checkbox"/> 880 Defend Trade Secrets Act of 2016</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609</p>	<p>OTHER STATUTES</p> <p><input type="checkbox"/> 375 False Claims Act</p> <p><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)</p> <p><input type="checkbox"/> 485 Telephone Consumer Protection Act</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 896 Arbitration</p> <p><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision</p> <p><input type="checkbox"/> 930 Constitutionality of State Statutes</p>

V. ORIGIN *(Place an "X" in One Box Only)*

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District *(specify)* 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*
28 USC § 2241

Brief description of cause:
Emergency Habeas action, seeking stay of any transfer or removal pending bond decision in Immigration Court.

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY *(See instructions):* JUDGE _____ DOCKET NUMBER _____

DATE _____ SIGNATURE OF ATTORNEY OF RECORD _____

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. (a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
(b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
(c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; NOTE: federal question actions take precedence over diversity cases.)
- III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. **Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. **Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

AYMAN SOLIMAN,

Petitioner,

v.

TODD M. LYONS, Acting Director,
Immigration and Customs Enforcement,
ROBERT LYNCH, Field Office Director
Detroit Field Office;
KRISTI NOEM, Secretary, United States
Department of Homeland Security;
RICHARD K. JONES, Sheriff, Butler County
Jail;

Respondents.

HEARING REQUESTED

Case No.:

**EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28
U.S.C. § 2241 AND REQUEST FOR TEMPORARY RESTRAINING ORDER**

INTRODUCTION

1. Petitioner Ayman Soliman, a detained non-citizen, asylum applicant, has been detained since July 9, 2025 in U.S. Immigration and Customs Enforcement (ICE) custody at the Butler County Jail, 705 Hanover Street, Hamilton, Ohio 45011. Mr. Soliman has no criminal history, was previously granted asylum by United States Citizenship and Immigration Services (USCIS) and is currently pursuing review of the revocation and asylum before the Immigration

Courts.

2. Petitioner has filed with the United States Immigration Court, Cleveland, Ohio, an application for custody redetermination (Bond). That application is currently pending and Petitioner is waiting for a scheduled hearing date.

3. Petitioner seeks relief in the form of an Injunction or Temporary Restraining Order (TRO) preventing the United States Department of Homeland Security from moving or transferring Petitioner outside of the jurisdiction of the Cleveland Immigration Court until such time as a custody redetermination hearing can be held regarding Petitioner's ongoing detention. Jurisdiction for consideration of release on bond is currently vested with the Cleveland Immigration Court pursuant to 8 C.F.R. § 1003.19(h)(2)(i), as referenced by Immigration Court Practice Manual, Section 9.3(c)(3).

4. Petitioner has submitted his signed statement in support of this application at Exhibit A.

JURISDICTION AND VENUE

5. This Court has jurisdiction under 28 U.S.C. § 2241(a) and § 2243, which authorizes federal district courts to grant writs of habeas corpus to persons in custody in violation of the Constitution or laws of the United States. See *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001) (habeas jurisdiction over immigration detention challenges).

6. This Court also has jurisdiction under 28 U.S.C. § 2201, Declaratory Judgement Act, and the All Writs Act, 28 U.S.C. § 1651, to address constitutional violations and issue injunctive relief.

7. Venue is proper in the Southern District of Ohio under 28 U.S.C. § 1391(e) because Petitioner is detained at Butler County Jail, a detention facility located within this district.

FACTUAL HISTORY

8. Respondent lawfully entered the United States with a B1/B2 visa on March 6, 2014. Contrary to the Notice to Appear, Respondent entered the United States at the Detroit International Airport.

9. Respondent briefly adjusted his status to that of R-1. He then filed a timely asylum application with USCIS on February 2, 2015.

10. Respondent was granted asylum in the United States on June 7, 2018. Subsequently, he followed the appropriate process to seek his “green card.” That process has been ongoing for over 6 years, with no resolution by USCIS.

11. By letter dated December 4, 2024, USCIS notified Respondent of their intent to revoke his grant of asylum. A brief hearing was held on the revocation issue with the Chicago Asylum Office. A decision revoking the prior grant of asylum was issued under the signature of the Director of the Chicago Asylum Office, Darice Alvertos, on June 3, 2025. A notice to appear was issued on that same date and filed with the Immigration Court on June 5, 2025.

12. Petitioner has submitted objections to the Notice to Appear in Immigration, objecting to the findings and conclusions of the Asylum Office.

CLAIMS

13. Petitioner has a right pursuant to the 5th Amendment of the United States Constitution to due process of law in immigration proceedings. *Pylar v. Doe*, 457 U.S. 202, 210 (1982) While not specifically mandating due process in bond proceedings, the Supreme Court has stated that indefinite detention is impermissible. *Zadvydas v. Davis*, 533 U.S. 678 (2001). The

Sixth Circuit, following *Zadvydas*, has required detention periods to be “reasonable.” *Ly v. Hansen*, 351 F.3rd 263 (6th Cir. 2003). The Immigration Court Practice Manual states that a bond hearing should be held at “the earliest possible date.” Practice Manual Section 9.3(d).

14. As of this filing, the Immigration Court has not yet scheduled the bond hearing date. The required filing of form I-830 by DHS was completed today, over 36 hours after detention. The Immigration Court may now transfer the matter to their Detained Docket and schedule a custody redetermination hearing.

15. DHS controls the location of Petitioner’s detention. Petitioner’s detention location determines the immigration court jurisdiction. By relocating Petitioner, DHS can delay a bond hearing for Petitioner by requiring the Immigration Courts to change venue, per the courts jurisdictional rules. While the instant application may seem premature or speculative as Petitioner has not been transferred or directly threatened with transfer at this time, DHS-ICE proudly claims its detention system manages the “...most highly transient...” detained population in the world. (Source: <https://www.ice.gov/detain/detention-management>) (Ex. B) Further, media reports have documented the use of transit, and relocation within the ICE detention system and how this practice and policy has stymied and even prevented detainees from seeking access to the court. (Source: <https://www.cnn.com/2025/04/10/us/immigration-detainees-trump-ice-students-visa>), Ex. C.

16. Defendant DHS has already caused a delay and prevented access to the scheduling of an immigration bond hearing by delaying the filing of the I-830 for over 36 hours, (Ex. D, Immigration Court electronic docket)

17. Petitioner is detained currently within the jurisdiction of the Cleveland

Immigration Court. Petitioner's access to an Immigration Judge for a bond hearing, is subject to the unfettered discretion of DHS to move him without notice. Further, the Immigration Court could not schedule a bond hearing until such time as DHS first filed the I-830 form and the matter is transferred to the court's detained docket.

18. Co-Counsel for Petitioner, Julia Healy, attempted to visit Petitioner at the Butler County Jail on July 9, 2025. Despite Petitioner being clearly listed on the jail's detainee roster, Counsel Healy was turned away and told Petitioner was not there. (Exhibit E, Jail Roster)

19. Thus, DHS controls the Immigration Courts ability to schedule a bond hearing. DHS controls jurisdiction and venue of the appropriate Immigration Court. DHS has unfettered discretion to delay bond hearings, and Immigration Court processes, by exercising this discretionary authority. DHS even controls counsel's access to the client. Such power, when implemented, prevents Petitioner from timely access to the Immigration Courts, needlessly prolongs detention at great cost to the United States taxpayer, and denies Petitioner due process of law.

20. This Court may grant a temporary restraining order and other such relief as necessary to prevent the transfer of a detained alien in immigration proceedings, in order to prevent access to immigration court, immigration counsel and immigration bond proceedings. See *Hamama v. Adducci*, 258 F.Supp 3d 828 (E.D. Mich. 2017) (vacated on other grounds, *Hamama v. Adducci*, 912 F.3d 869, (6th Cir. 2018) (The Sixth Circuit vacated the District Court jurisdiction, under 8 USC 1252(g) which barred judicial review of removal orders.))

20. Pursuant to Fed. R. Civ. P. 65(b), Petitioner requests a Temporary Restraining Order (TRO) prevent Defendants from transferring Petitioner to any detention facility outside the

Cleveland Immigration Court's jurisdiction until such time as the bond motion is resolved.

Petitioner satisfies the TRO requirements:

i. **Likelihood of Success on the Merits:** Petitioner's due process claim is likely to succeed, as transfers that delay bond hearings and impair court access violate the Fifth Amendment. Defendant DHS has already denied Petitioner to access to a bond hearing in Immigration Court for over 36 hours. Defendant Richard Jones and the Butler County Jail have denied Counsel's access to Petitioner, on July 9, 2025. Subsequent access was granted on July 10, 2025.

ii. **Irreparable Harm:** Transfer would cause irreparable harm by prolonging detention, disrupting counsel's representation, and delaying judicial review, with no adequate remedy at law.

iii. **Balance of Equities:** The harm to Petitioner outweighs any administrative inconvenience to DHS, as detention facilities within the Cleveland jurisdiction are available, and transfer is not necessary for public safety.

iv. **Public Interest:** Preventing arbitrary transfers upholds due process and ensures access to justice, serving the public interest.

PRAYER FOR RELIEF

WHEREFORE, Mr. Soliman prays that this Court grant the following relief:

1. Assume jurisdiction over this matter;
2. Order Respondents to show cause why the writ should not be granted and, if necessary, set a hearing on this Petition within five days of the return, pursuant to 28 U.S.C. § 2243;
3. Pursuant to Fed. R. Civ. P. 65(b), Petitioner requests a Temporary Restraining Order (TRO) to enjoin the United States from transferring or relocating Petitioner from the Butler County Jail to any facility outside the Cleveland Immigration Court's jurisdiction until the bond motion is resolved.
4. Petitioner requests that, following the TRO, this Court issue a preliminary injunction to maintain the status quo pending full adjudication of this habeas petition.
5. Petitioner requests such other and further relief as the Court deems just and proper, including

attorney's fees and costs under the Equal Access to Justice Act, 28 U.S.C. § 2412, if applicable.

6. Petitioner requests that the TRO be issued ex parte under Fed. R. Civ. P. 65(b)(1) because immediate and irreparable injury will result before Respondents can be heard in opposition, and DHS's transfer may occur imminently and without warning, rendering the bond motion moot. Petitioner's counsel has notified Respondents of this filing by sending this motion via email to DHS counsel at CLEOCCDutyAttorney@Ice.dhs.gov, and ICE-ERO operations at Detroit.Outreach@ice.dhs.gov the agencies posted email address for communications.

Dated: July 11, 2025

Respectfully submitted,



Robert A. Ratliff
Brennan, Manna and Diamond, LLC
200 Public Square, Suite 1850
Cleveland, OH 44114
(216) 658-2323

VERIFICATION

I, Robert A. Ratliff, Counsel for Petitioner, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: July 11, 2025

Signed: _____


Robert A. Ratliff
Brennan, Manna and Diamond, LLC
200 Public Square, Suite 1850
Cleveland, OH 44114
(216) 658-2323

CERTIFICATE OF SERVICE

I hereby certify that on this, the 11th day of July 2025, I have caused to be served via first class,
United States Mail a copy of this pleading with all exhibits to:

DHS Office of Chief Counsel
925 Keynote Road, Room 201
Brooklyn Heights, OH 44131

DHS-ICE, Blue Ash Field Office
9875 Redhill Dr.
Blue Ash, OH 45242

Butler Country Sheriff's Office
705 Hanover Street
Hamilton, OH 45011

Signed: _____



Robert A. Ratliff
Brennan, Manna and Diamond, LLC
200 Public Square, Suite 1850
Cleveland, OH 44114
(216) 658-2323

EXHIBIT A

AFFIDAVIT OF AYMAN SOLIMAN IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS AND MOTION FOR TEMPORARY RESTRAINING ORDER

I, Ayman Soliman, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am the Petitioner in the above-captioned case, and I am currently detained by Immigration and Customs Enforcement (ICE) at the Butler County Jail, located in Hamilton, Ohio, within the Southern District of Ohio.
2. I entered the United States lawfully on a B-2 visa on March 6, 2014. I applied for asylum within one year of my entry, and the United States Citizenship and Immigration Services (USCIS) granted my asylum on June 7, 2018. I maintained lawful status and employment authorization while pursuing permanent residency since that time.
3. On June 3, 2025, USCIS revoked my asylum status. I am currently disputing those findings and seeking asylum in removal proceedings before the Cleveland Immigration Court.
4. On June 10, 2025 I received a Notice to Appear in Immigration Court. It was included with the notice of the revocation of my asylum status, in the same envelope.
5. The court date was originally scheduled for July 3, 2025 at 2:30pm and on June 26th we received a Notice of Cancellation stating that they would schedule another hearing in the future. This was pursuant to my counsel's request for rescheduling.
6. I received a notice from ICE on June 23rd directing me to attend an appointment on June 25th. I had to reschedule it because I had a doctor's appointment on the same day. ICE notified me through my attorney that it was rescheduled for July 9th.
7. My attorney, Nazly Mamedova, was told by an ICE officer that this was a regular check in.
8. On July 9th I showed up to my appointment as directed, accompanied by Nazly's associate counsel, Julia Healy.
9. I was surprised to see that there were two officer conducting the interview, who introduced themselves as ICE officer [REDACTED] and FBI agent [REDACTED].
10. [REDACTED] proceeded to conduct the majority of the interview, and mostly asked questions about the political history of Egypt and my involvement with it as a journalist.
11. He repeatedly asked about my views on Egyptian politicians and well known organizations in Egypt and in the surrounding Middle East area.
12. He asked me about my family members and their political affiliations, which I confirmed they had none.

13. He also asked about my life in the US and the organizations that I have worked for and been involved with, places I lived, worked, and traveled, and my political views.
14. Both agents asked about my visa history, change of status, and application for asylum, including my mindset when applying for each.
15. I was shocked that a regular ICE check-in ended up being an interview with the FBI that lasted over two hours. My attorneys stated that they were also not expecting this.
16. At the end of the interview, the officers left the room to confer. They then returned and notified me that I was being placed under arrest.
17. I witnessed my attorney ask them about the reason for my detention. She asked them why they had to detain me, since I was clearly not a flight risk or a threat to the community. They replied that the detention was not about those issues, but was simply due to me being out of lawful immigration status. [REDACTED] explained that since my asylum was revoked, my immigration status reverts back to the status that I held most recently prior to asylum, which was R-1. He said that since I was only in valid R-1 status for a few weeks, that I had been out of status for a long time, and therefore he had to detain me.
18. My attorney offered that I could wear an ankle monitor or check in with an app on my phone, but [REDACTED] was unwilling to agree to these options. He stated that a new directive from the day before my appointment provided guidance stating that people should be detained if they lack immigration status.
19. I was then escorted to a cell inside the ICE facility, where I stayed alone for 30 minutes.
20. Then, they took my picture and fingerprints, and asked for biographical information such as my address and phone number.
21. Then, I was handcuffed again, and taken to Butler County Jail, where I arrived, around 1:45 or 2pm.
22. I was held with a group of other people in an inmate waiting room from 2pm until 3am the next morning.
23. I was allowed out of the room at 12a.m. to be processed into the system, where I was briefly interviewed about things like my name, height, weight, and any health issues, and they gave me an inmate tracking bracelet.
24. Then I was returned to the waiting room, and later entered my cell at 3:15am.
25. My attorney, Julia Healy, has informed me that she came to the Butler County Jail around 10:45 p.m. on July 9th. She was informed that I was not at the facility yet. This is not correct, as I was being held in the inmate waiting room at that time.

11. I respectfully request that this Court issue a writ of habeas corpus and a temporary restraining order to prevent ICE from transferring me from Butler County Jail to any facility outside the Cleveland Immigration Court's jurisdiction until my bond motion is resolved.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: July 10, 2025

Name: Ayman Soliman

Signature: Ayman Soliman

Witness Certification:

I, Julia Healy, am an attorney licensed to practice in the State of Ohio and admitted to practice in the Southern District of Ohio. I personally witnessed Ayman Soliman sign the foregoing document on July 10, 2025, and to the best of my knowledge, he did so knowingly and voluntarily.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 10, 2025 at Cincinnati, Ohio.

Julia Healy, Esq.
Bar No. 0104794
julia@nazlylaw.com / 513-740-1092

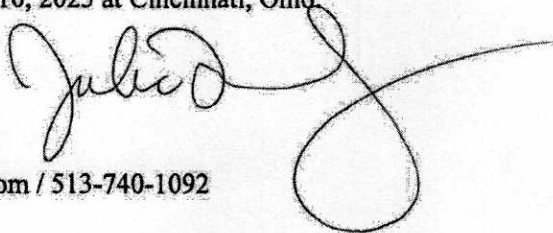
A handwritten signature in cursive script, appearing to read "Julia Healy", written in black ink. The signature is fluid and includes a large loop at the end.

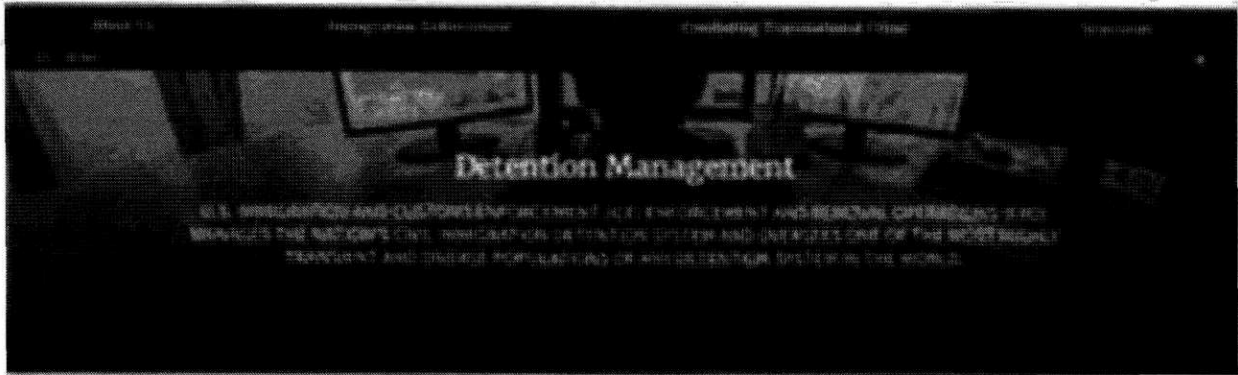
EXHIBIT B



U.S. Immigration
and Customs
Enforcement

Call 1-866-DHS-2-ICE to report suspicious activity

Report Crime



Detention Standards

Regardless of whether detention facilities are owned and operated by ICE, a state or local entity, or a contractor, all facilities housing ICE detainees must comply with one of several sets of detention standards which describe a facility's immigration detention responsibilities, explain what detainee services a facility must provide, and identify what a facility must do to ensure a safe and secure detention environment for staff and aliens in detention.

- 2024 National Detention Standards
- National Detention Standards (NDS) 2019
- National Detention Standards (NDS) 2013
- Detention Standards (NDS) 2007
- NDS 2001
- NDS 1999
- Form to Facility Standards 2020
- Detention Standards

Detention Facility Oversight

To ensure compliance with each contract's terms and conditions and the applicable detention standards, ICE and the Department of Homeland Security (DHS) employ a robust, multi-level oversight and compliance program. IRO monitors detention conditions through daily on-site compliance reviews to identify deficiencies, areas of concern, contract and facility issues, and to facilitate corrective actions. All facilities that house aliens detained by ICE are required to follow a strict set of detention standards.

Detention Policies

Detention is non-punitive. Once an alien is transferred to ICE custody, the agency makes a custody determination. ICE uses its limited detention resources to detain aliens to secure their presence for immigration proceedings or removal from the United States -- as well as those that are subject to mandatory detention, as outlined by the Immigration and Nationality Act, or those that ICE determines are a public safety or flight risk during the custody determination process.

When an alien is not subject to mandatory detention or is not deemed to be a public safety or flight risk, ICE exercises its discretion in making custody determinations to release aliens with conditions. These custody decisions are made on a case-by-case basis and after considering the totality of circumstances -- primarily considering risk of flight, national security threat, and risk to public safety.

ICE also takes other factors into consideration -- including when an alien has a serious medical condition, is the primary caregiver of minor children, or other humanitarian considerations.

Family Detention

In the past, ICE housed family units -- which contain adult alien parents or legal guardians accompanied by their own juvenile alien children -- in its Family Residential Centers (FRCs). In March 2021, ICE converted the Family Residential Centers (FRCs) from a 72-hour residential program to an under-72-hour residential/staging program called Family Staging Centers (FSCs).

In FY 2022, ICE opted to shift its resources again to increase efficiencies in Alternatives to Detention (ATD) enrollment for family units. ICE worked to co-locate with U.S. Customs and Border Protection (CBP) to avoid with limiting any processing slowdowns.

Once the agency determined that the FSCs were at a lower-than-expected capacity, ICE took steps to increase the use of the bed space for single adults and eventually, ICE stopped housing families entirely by December 2021.

Custody and Care of Unaccompanied Children (UC)

ICE does not detain unaccompanied children -- except in rare instances.

- As part of the restructuring of the former Immigration and Naturalization Service, the Homeland Security Act of 2002 transferred the responsibilities related to the care and custody of unaccompanied (undocumented) children to the U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR).
- In accordance with the Trafficking Victims Protection Reauthorization Act (TVPA) of 2008, IRO coordinates closely with inter-departmental partners to ensure the timely and safe transfer of unaccompanied alien children from DHS to HHS ORR custody.

Detention Statistics

ICE provides the following custody data below. The data tables are searchable and sortable, and worksheets are protected to ensure their accuracy and reliability. ICE confirms the integrity of the data as published on this site but cannot attest to subsequent transmissions.

EXHIBIT C

Why ICE is really moving detainees hundreds of miles from where they were arrested

CNN

[cnn.com/2025/04/10/us/immigration-detainees-trump-ice-students-visa](https://www.cnn.com/2025/04/10/us/immigration-detainees-trump-ice-students-visa)

Eric Levenson, Gloria Pazmino

April 10, 2025



From left to right, Badar Khan Suri, Rümeysa Öztürk and Mahmoud Khalil

AP/Reuters/CNN

CNN —

When Georgetown University fellow Badar Khan Suri was arrested by federal officers outside his home in Arlington, Virginia, so began a multistate, week-long journey in custody that would end in a rural jail over 1,000 miles away.

An Indian national working as a professor and studying in the US on a visa, Khan Suri was handcuffed on March 17 and taken to the Immigration and Customs Enforcement field office in Chantilly, Virginia, for fingerprinting, DNA swabs and paperwork, according to an amended complaint filed by his attorneys. He was moved to a detention center in Farmville, Virginia, in the middle of the night, and then to an ICE office in Richmond.

Next, he was taken to an airport, shackled, and flown to a detention facility in Alexandria, Louisiana. On March 20, Khan Suri was told he'd be sent to New York the next day, but he was instead driven to the Prairieland Detention Center in Alvarado, Texas. He was housed in

a common room with a TV playing 21 hours a day, given a thin plastic mattress for a bed, went without religious accommodations for several days and was given “used, dirty underclothing” to wear, according to the lawsuit.

In all, he was transferred 1,300 miles away from home even though two Virginia detention facilities were not operating at capacity, according to the lawsuit. The transfers to Louisiana and Texas, his attorneys argued, were “not necessary.”

Khan Suri’s whirlwind journey is not unique. Other detained immigrants, including Tufts University grad student Rümeysa Öztürk and former Columbia University grad student Mahmoud Khalil, were taken on similarly circuitous routes to faraway facilities. All three were arrested near their homes in urban East Coast areas and swiftly shipped off to detention facilities in rural Louisiana and Texas.

These transfers underscore ICE’s power in deciding where to house detained migrants – a power that some immigration attorneys say the Trump administration is now using to move disfavored migrants far from their attorneys, families and support systems.

“We’ve always seen transfers within the immigration system,” explained Adriel D. Orozco, senior policy counsel at the American Immigration Council, an immigrant advocacy group. “I hadn’t seen such a drastic transfer system, in the sense of sending folks from the Northeast all the way down to the South. That seems to be more of a change under this Trump 2.0.”

Khan Suri’s attorneys argued in their amended complaint that the moves represent a new government policy “to retaliate and punish noncitizens” like him who support Palestinian rights or are critical of Israeli policy.

“DHS has issued a directive that all individuals who are subject to the policy be transferred to detention centers in the south of the United States to jurisdictions that Respondents perceive will be more favorable to them, and where they will be far away from their families and attorneys, and therefore unable to promptly challenge their detention,” the filing states.

ICE says detention is ‘non-punitive’

For its part, ICE defends its transfer decisions in terms of practicality and logistics. A spokesperson for the agency did not comment on any other reasons as suggested in Khan Suri’s complaint.

The agency says on its website that detention is “non-punitive” and that it uses “limited detention resources to detain aliens to secure their presence for immigration proceedings or removal from the United States.”

Most immigration detention facilities are located along the southern border with Mexico. In fact, about half of all ICE detainees in the US are held in Texas and Louisiana, according to data from Transactional Records Access Clearinghouse (TRAC), a nonpartisan data research organization that tracks immigration records.

Their transfers across multiple state lines have sparked jurisdictional battles between the US government and attorneys representing Öztürk, Khalil, Khan Suri and others. While those battles play out, they continue to be held in custody more than a thousand miles from home.

None of them have had their motions for release decided by a judge, and the legality of their detention have yet to be considered by the courts. None of them have been charged with a crime.

These types of interstate transfers have long frustrated immigration attorneys, who say they can be a form of “judge-shopping” to friendlier districts and limit migrants’ ability to contact their lawyers and families.

“Part of the problem is they can be picked up and moved around like chess pieces, and that goes back many years,” immigration attorney Neil A. Weinrib told CNN last month. “They’ve always done that deliberately.”

For Öztürk, Khalil and Khan Suri – each detained in connection to their apparent pro-Palestinian views – the underlying explanation for being moved thousands of miles away may be less relevant than its devastating impact.

While his jurisdictional battle plays out, Khalil, who is a permanent legal US resident, is sitting inside the Central Louisiana ICE Processing Center, counting down the days until his wife is due to give birth later this month.

“Justice escapes the contours of this nation’s immigration facilities,” Khalil wrote in a public letter dictated to his attorneys by phone last month.

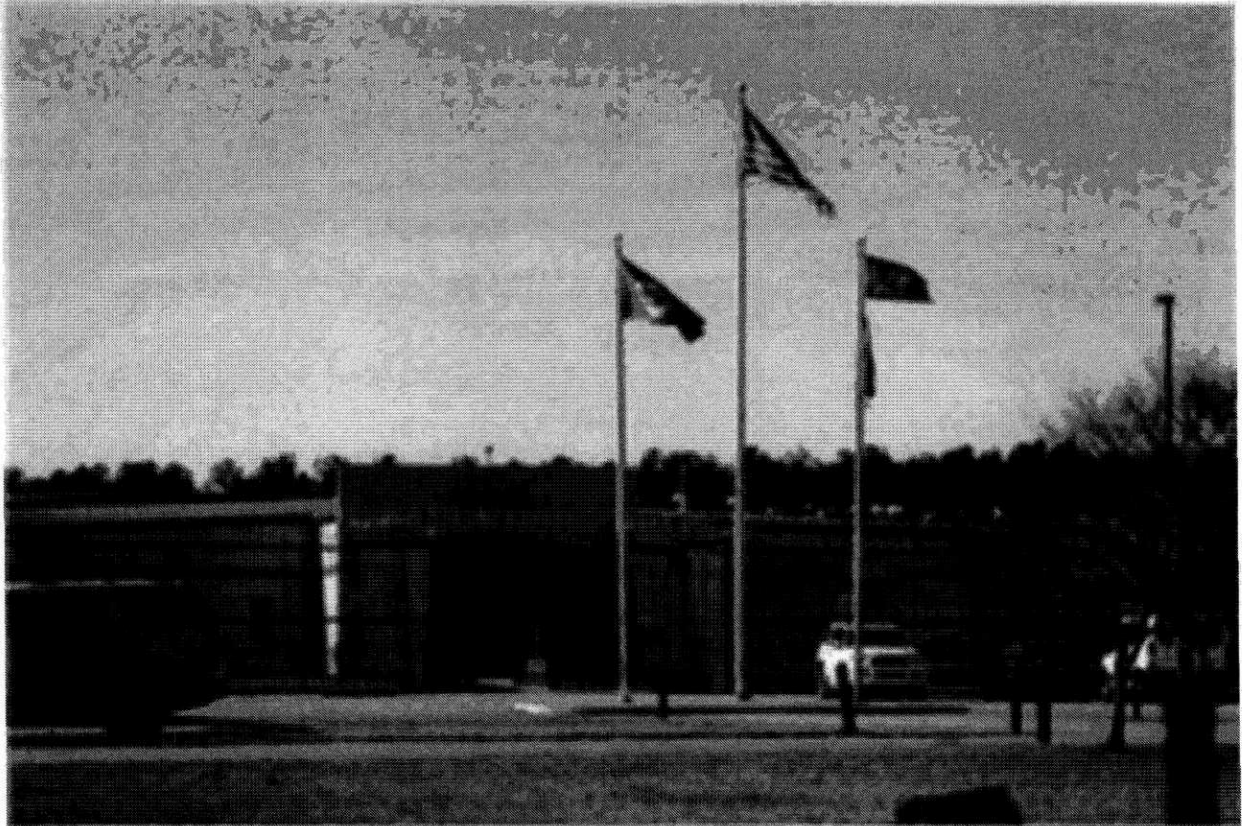
“Who has the right to have rights? It is certainly not the humans crowded into the cells here. It isn’t the Senegalese man I met who has been deprived of his liberty for a year, his legal situation in limbo and his family an ocean away. It isn’t the 21-year-old detainee I met, who stepped foot in this country at age nine, only to be deported without so much as a hearing.”

The migrants’ many moves post-arrest

Court filings on behalf of Khalil, Öztürk and Khan Suri show the challenges migrants face in the detention system, including the whiplash of being arrested and shipped across the country.

In video of Khalil's arrest, recorded by his wife, she can be heard asking officers multiple times where they are taking her husband. After ignoring her for several minutes, one of the officers says he's being taken to 26 Federal Plaza – the Immigration and Customs Enforcement District Office in Lower Manhattan.

The moment set off a chain of events that are still being litigated in court.



The Jena/La Salle ICE detention facility where Mahmoud Khalil is being held in Louisiana.

Edmund Fountain/Reuters

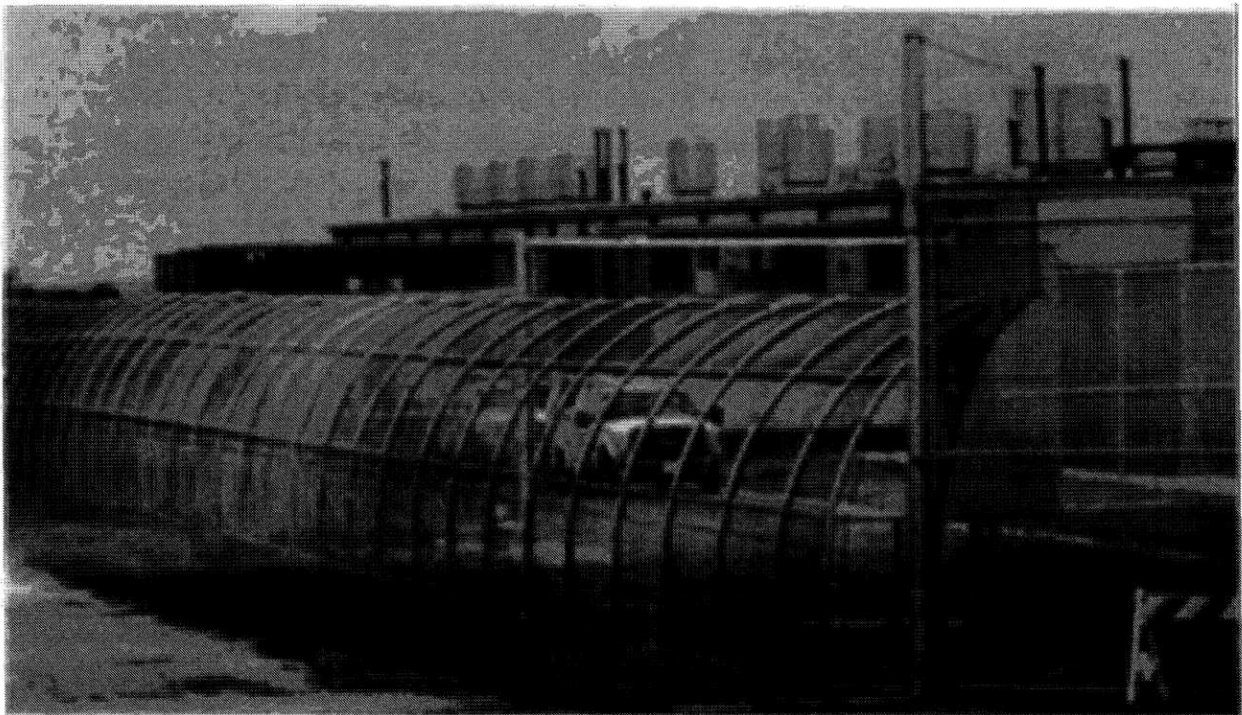
As officers drove Khalil downtown, his lawyer raced to file a habeas corpus motion – a petition to determine whether someone is being held legally – in a federal court in New York. The process took several hours and required Khalil's attorney to work into the night.

By the time the motion was filed, Khalil had been moved across the Hudson River to a detention facility in Elizabeth, New Jersey, without notice to his attorney. The government later told a judge the New Jersey detention center was unsuitable “because the facility was dealing with bedbug issues” and lack of space. Hours later, again without notifying his counsel, he was put on a plane from JFK airport to Dallas and then to Louisiana.

“Throughout this process, Mr. Khalil felt as though he was being kidnapped,” Khalil’s attorneys wrote in documents to the court. “He was reminded of prior experience fleeing arbitrary detention in Syria and forced disappearance of his friends in Syria in 2013.”

Following oral arguments on Khalil’s jurisdictional battle two weeks ago, his attorneys accused the government of purposely transferring not just Khalil but all the other student detainees. Ramzi Kaseem, one of the attorneys on Khalil’s legal team described the moves to CNN as part of a coordinated strategy on the government’s part.

“It’s this shell game where the government is trying to make it hard for lawyers to prevent them from doing this so that they can pick the court where they want these cases to move forward,” Kaseem said. “For some reason they think Louisiana gives them home court advantage. They want to cut people off from their communities, from their base of support, from their lawyers, from their families, from their schools, their friends and isolate them so that they can deport them in silence.”



Badar Khan Suri was arrested outside Washington DC and moved to the Prairieland Detention Center in Alvarado, Texas.

Louis DeLuca/The Dallas Morning News/AP

In Öztürk’s case, ICE officers determined there would be “no available bedspace” for Öztürk in the New England region prior to arresting her, attorneys for the US Attorney’s Office in Boston said in a filing.

But the lack of resources did not stop them from launching a dash across three states as they tried to find room – something her attorneys challenged later in court, saying the government had facility options in the New England area but simply declined to use them.

Her attorneys told a Boston court last week they were unable to locate her for several hours as immigration officers bounced her around the region.

First, Öztürk was moved to Methuen, Massachusetts; then to Lebanon, New Hampshire; and then to St. Albans, Vermont, where she was held overnight, according to court documents. From there she was transferred to Alexandria, Louisiana, followed by a final stop at the South Louisiana Correctional Facility in Basile – over 1,600 miles from her home in Boston.

“This all happened without notice to the court, without notice to her counsel,” Öztürk’s attorneys told reporters following a hearing in Boston last week.

Why ICE really moves detainees

One key explanation for why the government moves detainees to faraway facilities is because the majority of detention facilities are located in the southern US.

The ICE detention system is made up of hundreds of jails, prisons and other facilities, and many are concentrated along the border with Mexico, [according to TRAC](#). Texas houses over 12,000 detainees, by far the most of any state, followed by Louisiana with about 7,000 detainees, according to [March data from TRAC](#).

As of March 17, there was an average daily population of about 40,000 ICE detainees – meaning Texas and Louisiana house about half of all people in the detention system. By contrast, Massachusetts held just about 400 detainees on average, New York held about 650 detainees and Virginia held about 750, [TRAC data shows](#).

The government generally has a lot of power in choosing where to house detained migrants, Orozco explained.

“Unfortunately, there is a lot of discretion – at least, ICE states they have a lot of discretion – in where they decide to transfer individuals, and they’ve acted in that manner,” he said.

Immigration attorneys and civil rights advocates have sharply criticized many of these facilities for [mistreating migrants](#) and preventing them from properly defending their cases. They say the isolated nature of these rural detention facilities makes it difficult for migrants to communicate with attorneys, family and friends.

“When I’ve had clients, the difficulty there is not having a support system, not knowing what’s going to happen to you inside of those facilities. (That) can make it so that person decides that they just want to leave,” Orozco said.

For example, Orozco noted one former client who had been in the US for over 10 years, was married to a permanent legal resident and had two US citizen children. "But after three months (in detention) she said she couldn't take being in that facility anymore, and so she decided to accept her removal and leave the United States," Orozco said.

An ICE spokesperson did not comment on the attorney's allegations of detention location being used as a punishment.

The isolation and difficult conditions in these facilities is a form of coercion, the nonprofit advocacy group Robert F. Kennedy Human Rights said in a 2024 report on the Louisiana immigration detention system.

"In NOLA ICE detention, officials isolate people with viable defenses to deportation from the legal and language resources needed to fairly present their claims," the report stated. "And they use abusive treatment in punitive conditions to coerce people into renouncing those claims and accepting deportation to escape the misery of detention."

Immigration attorneys have also criticized these detention transfers as a form of judge-shopping. The idea is that the judge or appeals court in Texas or Louisiana under the Fifth Circuit Court of Appeals is likely to have more conservative legal views and be friendlier to the Trump administration's actions than a court in New York or Massachusetts. Trump appointed six of the active judges on the Fifth Circuit, in addition to some two-dozen Trump appointees who sit in the district courts the circuit covers.

"I think that there's maybe that kind of determination being made given that we're not seeing every person sent to Texas or Louisiana, so they're being very selective as to making sure that some of these folks are being sent to these facilities," Orozco said.

Whatever the underlying reasons, court filings show the transfers have had harsh personal consequences for Khalil, Öztürk and Suri.

"His children keep asking their mother when their father will come home," Suri's filing states. "Dr. Khan Suri normally holds his older son every night at bedtime, helping him fall asleep. Lately, his son has been crying uncontrollably and has stopped speaking. He is worried especially about his older son."

EXHIBIT D

[Back to Cases](#)

A-Number: [REDACTED] SOLIMAN, AYMAN
FAREH

Court Information

Select a case to view details and file documents

Removal Charging Doc. Date: **06/03/2025** Case Pending

End of list. Please file a Form EOIR-27 or EOIR-28 using "Appearances" link in the header to view additional cases.

Case Type: Removal
Charging Doc. Date: 06/03/2025
Noncitizen Name: SOLIMAN, AYMAN FAREH
Hearing Location: -- NA -- **Immigration Court:** 801 W. SUPERIOR AVE, STE13-100 CLEVELAND, OH 44113
Next Case Hearing: -- NA -- **Decision Date:** -- NA --
Hearing Medium: -- NA -- **Decision:** This case is pending.

Court Actions

eROP Documents

Document Filters

View All Filter at the Court Filter at the BIA

Actions	Document Type	Filed Date	Filed At	Filed By	Document Status
	I-830, Notice to EOIR: Alien Address	07/11/2025	Court	DHS	Pending
	I-830, Notice to EOIR: Alien Address	07/11/2025	Court	DHS	Pending
	EOIR-28, Notice of Entry of Appearance as an Attorney or Representative before the Immigration Court	07/10/2025	Court	Respondent Rep	Accepted
	EOIR-28, Notice of Entry of Appearance as an Attorney or Representative before the Immigration Court	07/10/2025	Court	Respondent Rep	Accepted
	Written Pleadings	07/10/2025	Court	Respondent Rep	Pending
	Motion to Change Docket Type	07/10/2025	Court	Respondent Rep	Pending
	Order - Initial Schedule (CFM-C4)	07/01/2025	Court	OIJ	Accepted

Actions	Document Type	Filed Date ▾	Filed At	Filed By	Document Status
	CASE Notice	06/26/2025	Court	OCII	Accepted
	EOIR-28, Notice of Entry of Appearance as an Attorney or Representative before the Immigration Court	06/24/2025	Court	Respondent Rep	Accepted
	Evidence Part 02	06/05/2025	Court	DHS	Accepted

Total Count: 13

« Previous 1 2 Next »

EXHIBIT E

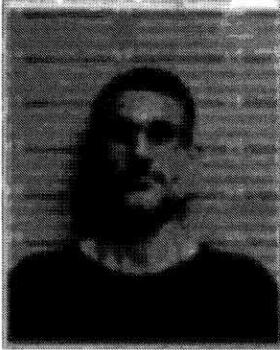
Butler County, Ohio - Persons Currently In Custody

Search by Last Name

A · B · C · D · E · F · G · H · I · J · K · L · M · N · O · P · Q · R · S · T · U · V · W · X · Y · Z

SOLIMAN, AYMAN FAREH AMIN

*** Held in custody by BUTL-JAIL at *Unmatched Code* ***

	Identifying Information	Alert Information
	Race: WHITE Gender: MALE DOB: [REDACTED] SSN: [REDACTED] Hair: GRAY Eye: BROWN Height: 5'09" Weight: 150 Source: BUTL-JAIL: [REDACTED] Updated: 7/11/2025	In Custody: IC Yes

Verify SSN

Booking Information	Arrest Information
Agency: BUTL-JAIL Location: *Unmatched Code* Booking Date: 7/9/2025 2:57 PM Booking Number: [REDACTED]	Arrest Date: 7/9/2025 3:00 PM Agency: *Not Entered* Location: Officer:

* Bonds/Bails listed below may not include the bail surcharge mandated by Ohio House Bill 1 and/or court costs which are due at the time the prisoner is released from custody. These fees may be as much as \$85 per bond.

#	COURT	CASE NUMBER	CHARGE DESCRIPTION	CHARGE DEGREE	CHARGE STATUS	JUDGE	BAIL TYPE	BAIL AMOUNT	DISPOSITION	DISP DATE	NEXT COURT DATE
[REDACTED]	*Unmatched Code*	()	HOLD FOR ICE	UN	*Unmatched Code*	*Unmatched Code*	*Unmatched Code*		*Not Entered*		



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