

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION (CINCINNATI)**

AYMAN SOLIMAN,

Petitioner,

v.

JOSEPH B. EDLOW, in his official capacity
as Director, U.S. Citizenship and Immigration
Services, U.S. Citizenship and Immigration
Services;

KRISTI NOEM, in her official capacity as
Secretary, U.S. Department of Homeland Security,
U.S. Department of Homeland Security;

RICHARD JONES, Sheriff, Butler County Sheriff's
Office
Defendants.

EX PARTE GRANT REQUESTED
HEARING REQUESTED

Case No.: 1:25-cv-556-JPH-MRM

**AMENDED AND CORRECTED EMERGENCY MOTION FOR EX PARTE
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION TO
PREVENT CONTINUED UNLAWFUL DETENTION**

INTRODUCTION

Plaintiff Ayman Soliman, by and through undersigned counsel, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 65(b) for an Emergency Ex Parte Temporary Restraining Order (TRO) and, following notice and hearing, a Preliminary Injunction, enjoining Defendants from continuing his unlawful detention pending resolution of this action challenging the termination of his asylum status and detention.

In support thereof, Plaintiff states as follows:

I. BACKGROUND

1. Plaintiff previously filed a Petition for Writ of Habeas Corpus seeking to vacate U.S. Citizenship and Immigration Services' (USCIS) arbitrary and unlawful June 3, 2025, termination of his asylum status. That termination, which is invalid as arbitrary, capricious, contrary to law, and violative of due process, has resulted in Plaintiff's unlawful detention by U.S. Immigration and Customs Enforcement (ICE) as a purported removable alien.

2. The Immigration Court has declined jurisdiction to review Plaintiff's custody status. That order is, in part, premised upon a continuation of use of unsupported and undocumented allegations regarding the Plaintiff. (Ex. A, Denial of Bond Jurisdiction) (Exhibit B DHS Brief opposing bond, Supp. Exhibits Omitted) These new allegations, submitted by DHS in immigration court proceedings, never mentioned in the termination notice, and only stated after three separate authors refuted USCIS and DHS reasoning based on their articles.

3. Plaintiff, a lawfully granted asylee since June 7, 2018, was detained on July 9, 2025, in Cincinnati, Ohio, following a scheduled ICE check-in. He is currently detained at Butler County Jail. His detention, based solely on the flawed termination decision, is depriving him of liberty without due process and in violation of the Immigration and Nationality Act (INA).

4. Without immediate relief, Plaintiff will suffer ongoing irreparable harm from prolonged detention, including separation from family and friends, loss of employment, psychological distress, and risk of removal to persecution in Egypt. Plaintiff satisfies the requirements for a TRO and preliminary injunction: a strong likelihood of success on the merits; irreparable harm; equities in his favor; and public interest alignment.

5. Pursuant to Fed. R. Civ. P. 65(b)(1)(B), counsel certifies that, due to the urgency of ongoing detention, no prior notice has been provided to Defendants. Plaintiff will serve this motion on Defendants via the U.S. Attorney's Office immediately upon filing and requests an expedited hearing for preliminary injunction.

II. LEGAL STANDARD

6. A TRO or preliminary injunction requires: (1) substantial likelihood of success on the merits; (2) irreparable harm absent relief; (3) balance of equities favoring relief; and (4) public interest served. *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008); *Overstreet v. Lexington-Fayette Urban Cnty. Gov't*, 305 F.3d 566, 573 (6th Cir. 2002). In immigration detention cases, courts grant relief to prevent unconstitutional or unlawful confinement. *See, e.g., Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (detention must serve legitimate purpose); *Hamama v. Adducci*, 946 F.3d 875, 879 (6th Cir. 2020) (enjoining detention pending due process claims).

III. ARGUMENT

A. Plaintiff Has a Substantial Likelihood of Success on the Merits

7. Plaintiff's Habeas claims are strong and consistent. The asylum termination is arbitrary and capricious under 5 U.S.C. § 706(2)(A), based on errors, and lacking the preponderance of evidence required for Tier III status or material support. INA § 212(a)(3)(B). Attached Ex. C, Asylum Termination; Ex. D, Brooke Letter (July 14, 2025); Ex. E, Vannetzel Letter (July 20, 2025), Ex. F, Russel E-mail, (July 24, 2025).

8. It is contrary to law under § 706(2)(C), misapplying the terrorism bar without required findings and violating res judicata. *Uddin v. AG*, 870 F.3d 282 (3d Cir. 2017); *Arangure v. Whitaker*, 911 F.3d 333 (6th Cir. 2018).

9. Detention violates due process because Plaintiff retains his asylee status absent valid termination. Fifth Amendment; *Jennings v. Rodriguez*, 583 U.S. 281, 293 (2018) (detention requires procedural safeguards); *Matter of M-H-Z-*, 26 I&N Dec. 757 (BIA 2016) (burden on government).

10. As an asylee, Plaintiff is not subject to mandatory detention under INA § 236. The government's Form I-261 filed on July 22, 2025, does not include any charge that requires mandatory detention, and it supersedes the Notice to Appear issued on July 3, 2025. Ex. G, NTA dated July 3, 2025; Ex. H, Form I-261 dated July 22, 2025. Further, by withdrawing the material support claims from the Notice to Appear, DHS prevents those claims from being challenged prior to an asylum trial through a contested Master Calendar proceeding.

11. Additionally, the termination's invalidity renders detention unlawful. 8 C.F.R. § 208.24(f) (asylees not detainable absent valid termination).

12. Petitioner has no other relief available as the Immigration Court has declined jurisdiction to reconsider his detention, in part based upon new claims by DHS, never previously raised, never supported with any facts or documentary evidence and so prejudicial to the procedure and due process in immigration proceedings as to question the validity of all other claims made by DHS regardless of which agency is involved. (Ex. B, *supra*).

B. Plaintiff Will Suffer Irreparable Harm Absent Relief.

13. Continued detention causes immediate, irreparable injury: liberty deprivation, family separation, physical and mental health risks and economic loss. *Zadvydas*, 533 U.S. at 690 (indefinite detention presumptively harmful); *Hamama*, 946 F.3d at 879 (detention harm irreparable).

14. While detained at Butler County Jail, Plaintiff was previously placed into segregated detention by DHS agents, and officers of the Butler County Sheriff's Office. This custody placement is believed to be a result of targeted harassment due to Plaintiff's attempt to practice his religion. The segregated detention resulted in solitary confinement, denial of access to visitation, and restricted access to legal calls with counsel. Petitioner remains subject to the internal procedural whims of the detention center, subject to often and random lock-downs based on the conduct of other inmates and detainees. All of which are further due process violations that are designed to limit and control Plaintiff's ability to effectively pursue asylum claims.

C. The Balance of Equities Favors Plaintiff

15. Defendants suffer no harm from release; they can monitor via alternatives methods of detention, such as supervision or electronic monitoring. Plaintiff faces profound hardship. *Nken v. Holder*, 556 U.S. 418, 435 (2009) (government interest yields to liberty). Importantly, Petitioner has been in the United States without incident for over a decade. There has been no change in the information available to the Government during that time. Detention now is premised solely on conditions, circumstances and unsupported allegations created by DHS and its subordinate agencies.

D. Relief Serves the Public Interest

16. Enjoining unlawful detention upholds due process, humanitarian principles, and efficient adjudication. It prevents taxpayer-funded unnecessary confinement and aligns with asylum protections. *See Hamama*, 946 F.3d at 880 (public interest in constitutional compliance).

IV. BOND

17. No bond required, as this challenges government action without pecuniary harm.
Fed. R. Civ. P. 65(c); *Zambelli Fireworks Mfg. Co. v. Wood*, 592 F.3d 412, 426 (3d Cir. 2010).

V. CONCLUSION

For the foregoing reasons, Plaintiff requests this Court:

- A. Issue a temporary restraining order ex parte enjoining continued detention and ordering Plaintiff's immediate release from ICE custody pending full resolution of this action;
- B. Set an expedited hearing regarding the request for preliminary injunction;
- C. Upon hearing, preliminary injunction extending relief;
- D. Grant such other relief as the Court deems just.

Dated: August 14, 2025

Respectfully submitted,


/s/ Robert A. Ratliff
Robert A. Ratliff, Esq.
Brennan, Manna and Diamond, LLC
200 Public Square, Suite 1850
Cleveland, Ohio 44114
(216) 658-2323
raratliff@bmdllc.com
Attorney for Plaintiff Ayman Soliman

CERTIFICATE OF SERVICE

I certify that on August 14, 2025, this Motion was served via first class United States mail and email on the U.S. Attorney for the Southern District of Ohio and the Butler County Prosecutor.

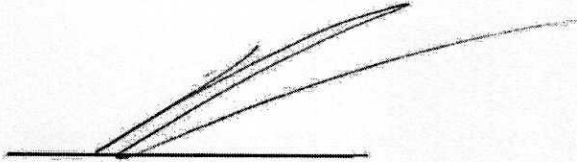
A handwritten signature in black ink, consisting of several overlapping, sweeping lines that start from a horizontal baseline and curve upwards and to the right.

EXHIBIT A

Part 1

EXHIBIT A

Part 2

Exhibit A

Part 3

EXHIBIT B

EXHIBIT C

EXHIBIT D

EXHIBIT E

EXHIBIT F

EXHIBIT G

EXHIBIT H

EXHIBIT A

Part 1



UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
CLEVELAND IMMIGRATION COURT

Respondent Name:

SOLIMAN, AYMAN FAREH

To:

Ratliff, Robert A
200 Public Square
Suite 1850
Cleveland, OH 44114

A-Number:

██████████-160

Riders:

In Custody Redetermination Proceedings

Date:

08/11/2025

AMENDED ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

Denied, because

This Court does not have the authority to redetermine custody status in this case.

Granted. It is ordered that Respondent be:

released from custody on his own recognizance.

released from custody under bond of \$

other:

Other:

In the alternative, the Court finds that the Respondent did not meet his burden to establish that he does not pose a threat to the community and a risk of flight from proceedings.



Immigration Judge: Riedthaler-Williams, Jennifer 08/11/2025

Appeal: Department of Homeland Security: waived reserved
Respondent: waived reserved

Appeal Due: 08/27/2025

Certificate of Service

This document was served:

Via: [M] Mail | [P] Personal Service | [E] Electronic Service | [U] Address Unavailable

To: [] Alien | [] Alien c/o custodial officer | [E] Alien atty/rep. | [E] DHS

Respondent Name : SOLIMAN, AYMAN FAREH | A-Number : ~~2025-000~~160

Riders:

Date: 08/11/2025 By: DIAZ, MANJU, Court Staff



UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
CLEVELAND IMMIGRATION COURT

Respondent Name:

SOLIMAN, AYMAN FAREH

To:

Ratliff, Robert A.
200 Public Square
Suite 1850
Cleveland, OH 44114

A-Number:

[REDACTED]

Riders:

In Custody Redetermination Proceedings

Date:

07/28/2025

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

Denied, because

This Court does not have the authority to redetermine custody status in this case.

Granted. It is ordered that Respondent be:

released from custody on his own recognizance.

released from custody under bond of \$

other:

Other:

In the alternative, the Court finds that the Respondent did not meet his burden to establish that he does not pose a threat to the community and a risk of flight from proceedings.




Immigration Judge: Riedthaler-Williams, Jennifer 07/28/2025

Appeal: Department of Homeland Security: waived reserved
Respondent: waived reserved

Appeal Due:

Certificate of Service

This document was served:

Via: [M] Mail | [P] Personal Service | [E] Electronic Service | [U] Address Unavailable
To: [] Noncitizen | [] Noncitizen c/o custodial officer | [E] Noncitizen's atty/rep. | [E] DHS
Respondent Name : SOLIMAN, AYMAN FAREH | A-Number : 

Riders:

Date: 07/28/2025 By: DIAZ, MANJU, Court Staff

EXHIBIT B

EXHIBIT C

U.S. Department of Homeland Security
Chicago Asylum Office
181 W. Madison St., Suite 3000
Chicago, Illinois 60602



**U.S. Citizenship
and Immigration
Services**

Date: May ~~2025~~ **2025**

Alien #: 





Ayman SOLIMAN


Notice of Termination of Asylum Status

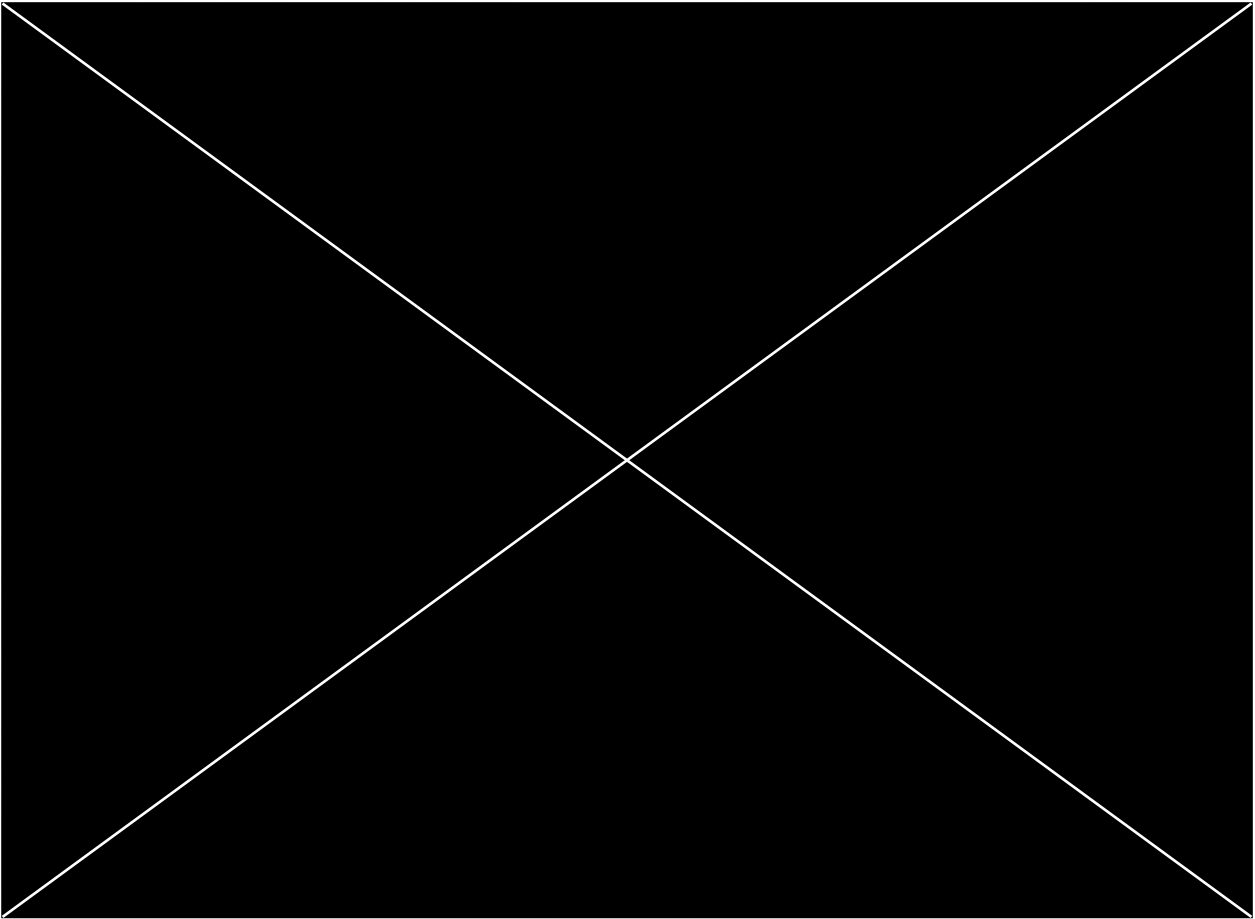
Dear Mr. SOLIMAN:

The purpose of this letter is to notify you that U.S. Citizenship and Immigration Services (USCIS) has terminated your asylum status, effective **May 21, 2025**.

USCIS obtained evidence that indicated you provided material support to a Tier III terrorist organization, such that you are not eligible for asylum. Pursuant to Section 208(c)(2)(B) of the Immigration and Nationality Act (INA), asylum status may be terminated if, following an interview, it is determined that an alien is subject to a terrorism-related ground of inadmissibility as defined in INA Section 212(a)(3)(B). Specifically, your asylum status is terminated due to your having provided material support to an undesignated terrorist organization and for membership in a terrorist organization, as defined in INA sections 212(a)(3)(B)(iv)(VI)(dd) and 212(a)(3)(B)(i)(VI).

A group meets the definition of a Tier III terrorist organization when it engages in terrorist activity or has a subgroup that engages in terrorist activity as defined in INA Section 212(a)(3)(B).  a group of which you were once a board member and active member, became openly associated with the —a terrorist group from December 5, 2012 to the present—between 2011 and 2013, during part of the time you were politically engaged in Egypt; specifically, “[i]n one instance,  allegedly used its vehicles to transport ‘fully veiled [female] voters’ (*al-nakhibat al-munaqibat*) to polling stations. 

 Steven Brooke, Combatting Terrorism Center at West Point, *Islamic Groups' Social Service Provision and Attitudinal Change in Egypt*, June 2015, available at https://ctc.westpoint.edu/wp-content/uploads/2015/06/Brooke_CTC_IslamicGroupSocialService_June20153.pdf (accessed 25 April 2025).



A preponderance of the evidence indicates you provided material support to a Tier III terrorist organization, and you did not demonstrate by clear and convincing evidence that you did not know, or reasonably should not have known, that the organization was a terrorist organization. As a member of [REDACTED] for over a decade, including during the time the group was affiliated with [REDACTED] you either knew, or reasonably should have known, of the link between these groups, particularly considering your level of participation as a board member of your local chapter. Furthermore, the ruling of the Administrative Court that [REDACTED] [REDACTED] has no ties to [REDACTED] was, as noted by the country reports, a result of the group's pursuit [REDACTED] Steven Brooke, Combatting Terrorism Center at West Point, *Islamic Groups' Social Service Provision and Attitudinal Change in Egypt* (cited above). As such, the High Administrative Court ruling is not given much weight in refuting the link between the groups, since it came as a result of [REDACTED] currying favor with the Egyptian government to achieve a favorable ruling.

Enclosed please find a Notice to Appear (Form I-862), which places you in removal proceedings. Pursuant to 8 C.F.R. 208.24(c), you are no longer eligible for employment authorization incident to asylum status. Accordingly, the employment authorization last issued to you on June 7, 2018 based on your grant of asylum is hereby terminated as of the date of this letter.

You should direct any questions about your asylum request or removal proceedings to the immigration court having jurisdiction in your case. In addition, you must notify the immigration court of any change of your address.

Sincerely,

Darice I. Alvertos
Director, Chicago Asylum Office

Attach: Notice to Appear

CC: Kathryn Brady



EXHIBIT D

EXHIBIT E

EXHIBIT G


Department of Homeland Security

Notice to Appear

In removal proceedings under section 240 of the Immigration and Nationality Act:

File No. 

In the Matter of:

Respondent: AYMAN FAREH SOLIMAN currently residing at:

(Number, street, city and Zip Code) (Area code and phone number)

- 1. You are an arriving alien.
- 2. You are an alien present in the United States who has not been admitted or paroled.
- 3. You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States.
2. You are a native of EGYPT and a citizen of EGYPT;
3. You were admitted to the United States at TUCSON, AZ on or about 06 MARCH 2014 as a nonimmigrant B-2 VISTOR FOR PLEASURE with authorization to remain in the United States until 01 SPETEMBER 2014;
4. On 02 FEBRUARY 2015, you filed an I-589 Application for Asylum with the U.S. Citizenship and Immigration Services (USCIS) Asylum Office;
5. On 07 JUNE 2018, your I-589 Application for Asylum was granted by the Chicago Asylum Office;
6. On 03 JUNE 2025, your asylum status was terminated because there is evidence that indicated that you provided material support to a Tier III terrorist organization, such that you are not eligible for asylum;
7. You remained in the United States thereafter without further authorization.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a) (1) (A) of the Immigration and Nationality Act (Act), as amended, in that you are an alien who at the time of entry or adjustment of status was within one or more of the classes of aliens inadmissible by the law existing at such time, to wit:
Section 212(a) (3) (b) (i) of the Immigration and Nationality Act, in that you are an alien who has engaged in terrorist activity as described in 212(a) (3) (B) (iv) (VI) (dd) and 212(a) (3) (B) (iv) (VI) for having provided material support for the commission of terrorist activity, an individual that commits terrorist activity, or to a terrorist organization.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- Section 235(b)(1) order was vacated pursuant to: 8CFR 208.30 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

801 W. SUPERIOR AVE, STE13-100 CLEVELAND, OH 441131829

(Complete Address of Immigration Court, including Room Number, if any)

on 07/03/2025 at 02:30pm to show why you should not be removed from the United States based on the

(Date)

(Time)

charge(s) set forth above.



Supervisory Asylum Officer

(Signature and Title of Issuing Officer)

Date: 06/03/2025

Chicago IL

(City and State)

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/I-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Upon information and belief, the language that the alien understands is ARABIC.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office of Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

(Signature of Respondent)

Date: _____

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on 06/05/2025, in the following manner and in compliance with section 239(a)(1) of the Act.

In person by certified mail, returned receipt # _____ requested by regular mail

Attached is a credible fear worksheet.

Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the _____ language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

(Signature of Respondent if Personally Served)

A. Hunt, LAS

(Signature and Title of Officer)

EOIR - 2 of 3

Privacy Act Statement

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.



EXHIBIT H

Uploaded on: 07/22/2025 at 11:02:16 AM (Eastern Daylight Time) Base City: CLE

U.S. Department of Homeland Security
Immigration & Customs Enforcement

Additional Charges of Inadmissibility/Deportability

In: Removal proceedings under section 240 of the Immigration and Nationality Act
 Deportation proceedings commenced prior to April 1, 1997 under former section 242 of the Immigration and Nationality Act

In the Matter of:

Alien: Soliman, Ayman

File No: ~~XXXXXXXXXX~~

Address: c/o Counsel of record – ICE Custody

In addition to In lieu of the charge(s) already pending, there is hereby lodged against you additional charge(s) that you are subject to being taken into custody and deported or removed from the United States pursuant to the following provision(s) of law:

Section 237(a)(1)(B) of the Immigration and Nationality Act (Act), as amended, in that after admission as a nonimmigrant under Section 101(a)(15) of the Act, you have remained in the United States for a time longer than permitted, in violation of this Act or any other law of the United States.

Section 237(a)(1)(B) of the Immigration and Nationality Act (Act) as amended, in that you are present in the United States in violation of law

In support of the additional charge(s) there is submitted the following factual allegation(s) in addition to in lieu of those set forth in the original charging document:

1. You are not a citizen or national of the United States.
2. You are a native of Egypt and a citizen of Egypt;
3. You were admitted to the United States on or about March 6, 2014 as a nonimmigrant B-1/B-2 Visitor with authorization to remain in the United States until September 1, 2014;
4. Your status was changed to that of an R-1 Nonimmigrant, with authorization to remain in the United States from September 2, 2014 to March 1, 2017;
5. On February 2, 2015, you filed an I-589 Application for Asylum with the U.S. Citizenship and Immigration Services (USCIS) Asylum Office;
6. On June 7, 2018, your I-589 Application for Asylum was granted by the Chicago Asylum Office;
7. On June 3, 2025, your asylum status was terminated by the Chicago Asylum Office;
8. You remained in the United States beyond the termination of your asylum status without authorization from the Department of Homeland Security.
9. You are present in the United States in violation of the law, as you have not been provided authorization from the Department of Homeland Security to remain in the United States.

Dated: July 22, 2025

**CHERYL C
GUTRIDGE**

Digitally signed by CHERYL C
GUTRIDGE
Date: 2025.07.22 10:57:28
-04'00'

Cheryl C. Gutridge
Senior Attorney

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this Notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents which you desire to have considered in connection with your case. If any document is in a foreign language, you must bring the original and a certified English translation of the document. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.


At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the charging document and that you are inadmissible or deportable on the charges contained in the charging document. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government.

You will be advised by the immigration judge before whom you appear, of any relief from removal for which you may appear eligible including the privilege of departing voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

Failure to appear: You are required to provide the ICE, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the ICE.

Certificate of Service

This charging document was served on the respondent by me on July 22, 2025, in the following manner and in compliance with section 239(a)(1)(F) of the Act:
(Date)

in person by certified mail, return receipt requested by regular mail  via ECAS delivery

to: Counsel of Record, Robert Ratliff, who is a registered ECAS user

(Alien's address)

The alien was provided oral notice in the _____ language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

**CHERYL C
GUTRIDGE**

Digitally signed by CHERYL C
GUTRIDGE

Date: 2025.07.22 10:58:24

(Signature of respondent if personally served)

Cheryl C. Gutridge, Senior Attorney