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

RONALDO V.,

Petitioner

Agency File No. 
Case No. 1:25-cv-00747

-against-

Pam BONDI, in her official capacity as the Attorney General of the United States; Kristi NOEM, in her official capacity as Secretary for the United States Department of Homeland Security; Joseph EDLOW, in his capacity as Director for United States Citizenship and Immigration Services, Robert Lynch, in his capacity as Field Office Director, ERO Detroit and Kevin GRATHWOHL, in his capacity as warden at Butler County Jail.

**PETITIONER'S NOTICE OF FILING
EXHIBITS IN SUPPORT OF
VERIFIED PETITION FOR
WRIT OF HABEAS CORPUS**

Respondents.

U.S. DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO

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SUMMARY OF EXHIBITS

Now comes Petitioner, by and through undersigned Counsel, and hereby gives notice of filing the attached exhibits in support of his petition for writ of habeas corpus, requesting, among other relief, his immediate release from detention.



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OMB Control No: 0970-0552
 Expiration Date: 03/31/2022



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS)
OFFICE OF REFUGEE RESETTLEMENT (ORR)
 DIVISION OF UNACCOMPANIED CHILDREN OPERATIONS (DUCO)
VERIFICATION OF RELEASE

VERIFICATION OF RELEASE

Name of Minor: **Ronaldo V [REDACTED]** Aliases (if any): **V [REDACTED] Ronaldo**
 Minor's Date of Birth: **[REDACTED]** Minor's A#: **240570871**

The Office of Refugee Resettlement (ORR) has released the above named minor from Federal custody pursuant to section 462 of the Homeland Security Act of 2002 and section 235 of the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 to the care of:



Name of Sponsor: **[REDACTED]**
 Aliases (if any): **[REDACTED]**
 Address: **[REDACTED]**
 City: **Cincinnati**
 State: **OH** Zip Code: **45246**
 Telephone#: **[REDACTED]**
 Relationship to Child: **[REDACTED] (Non-Primary Caregiver)**

ACKNOWLEDGEMENT OF THE SPONSOR CARE AGREEMENT

The above named sponsor has agreed to the provisions set forth in the *Sponsor Care Agreement*, pertaining to the minor's care, safety, and well-being, and the sponsor's responsibility for ensuring the minor's presence at all future proceedings before the Department of Homeland Security and the Department of Justice/Executive Office for Immigration Review (EOIR).

FOR INTERNAL USE ONLY

Name ORR care provider Facility: **A New Leaf - Dorothy Mitchell**

Date: **03/04/2022**

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Declaration of Ronaldo [REDACTED] V [REDACTED]

1. My name is Ronaldo [REDACTED] V [REDACTED]. I was born on [REDACTED] in Guatemala.
2. I entered the U.S. on February 11, 2022 as an Unaccompanied Minor.
3. I am currently twenty-one years old and am a senior at [REDACTED]
4. On June 19, 2025 I was charged with my second No Operator's License charge and a speeding ticket. There was no crash, no injury, and no damage to any property.
5. Although I have one prior ticket for driving without license, also with no damage or injury to anyone, I have no other criminal history.
6. I was sentenced to 180 days county jail with 90 suspended.
7. I have been in local jail since in the 19 of June 2025.
8. I spent about 20 days in one jail without air conditioning in June through July. For one week, due to my situation and due to my depression, I wanted to kill myself. I thought a lot about suicide for about a week.
9. I began to work in the kitchen while there, which gave me a purpose and something to do. I earned calling cards to speak to my family. It wasn't until I started working in the kitchen and had a purpose and then things in my head quieted down.
10. In exchange for the work I provided, which was 2 am through 3 pm daily, I was given 40 free coffees (I do not drink coffee) and five 5-minute calling cards per week, but no pay.
11. During this time, I was not given the medications I am prescribed for multiple health conditions including anxiety, depression, gastritis, neck pain, and more, since I entered jail on June 19, 2025 although I have requested them. I was provided something for anxiety which I do not recall the name of. I felt like I was going to faint on them, my head was pounding, so I stopped taking them. It clearly was not what I was prescribed before. That was daily.
12. I used to take many medications per day. I would take one pill every four hours for gastritis and I have neck problems for a lot of anxiety. My stomach hurts, I can't eat without pain.
13. I have missed over one month of school days this school year due to my incarceration. The school is telling me I will not graduate. This is my final year, I was entering 12th grade and was ready to graduate. If I am expelled from school, I will not be able to return to a public education due to my age.
14. On September 3, I was granted early release by Fairfield Municipal Court. I do not know why I was taken back to the jail. I went to work in the kitchen but they told me I wasn't eligible or available to work in the kitchen anymore. They didn't tell me why. They sent me to a cell, and I slept there that night. No one told me anything.

15. On September 4, 2025, when I went to leave, I didn't even gather my belongs aside from my paperwork, like shampoo, pasta, clothing, food, because I thought I was going home. I got into a van but exited at the Butler County Jail.
16. They put me in a cell, then they called me to a room and took my fingerprints, asked me for my personal information, and they didn't present me with any ICE information but asked if I wanted to see a judge, because if I didn't, they would deport me. I said I want to see a judge because I don't want them to deport me. The officer said something like, "Well I don't know when it will be, and it will be all the way in Cleveland." They said it to discourage me and get me to sign my deportation. They left me waiting for like 5 hours in a cell, then changed me to a new uniform, took my shoes, and put me in a cell. The officers have asked me to "sign for my deportation" though I instead signed a document stating I want to see a judge. They tell us, "If you sign for your deportation, you will be out of here in just two weeks."
17. They initially put me in a dirty cell, with food thrown on the ground, no air conditioning that functioned, and a toilet that didn't worked so for two days, we had a toilet that wouldn't flush most of the time and the second day, it didn't work at all. I could see empty cells with televisions that were totally open, with no one in the. One inmate told me there were cells open, so I asked four officials to move my cell mate and I, but they all told me no. Until the toilet wouldn't work at all, and so they were forced to move us to another cell but I think they put us there so we would despair and sign our deportations.
18. Recently, I was sleeping and they called to me and said, "You have a medical check." The nurse came to where I was and I was surrounded by people who could see and hear what was happening with no privacy. They took my blood pressure, checked my blood, gave me an injection but I don't know what it was called because she told me in English and I don't know the name of medications in English. They told me I have anemia and I need vitamins and calcium. And I told them I have gastritis; I don't think they will help with the vitamins.
19. Until I filed my petition for habeas, the government failed to actually open a removal case against me, meaning I could not even argue my case to a judge, but was rather detained indefinitely.
20. I have approved Special Immigrant Juvenile Status, which has not been revoked.


State of Ohio, County of Butler

Sworn to or affirmed and subscribed before me by Ronaldo V [REDACTED] on this date of November 4, 2025.



My commission expires: never

Signature of Notary Public – State of Ohio


(0092899) Carolyn Marks



Carolyn A. Marks
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration Date
Sec 147.03 O.R.C.



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

Respondent Name:

V [REDACTED] RONALDO

To:

Marks, Carolyn A
9378 Mason Montgomery Road
#385
Mason, OH 45040

A-Number:



Riders:

In Custody Redetermination Proceedings

Date:

10/09/2025

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
The Court does not have the authority to redetermine bond 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:



Immigration Judge: Riedthaler-Williams, Jennifer 10/09/2025

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

Appeal Due: 11/07/2025

Certificate of Service

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Respondent Name : V [REDACTED], RONALDO | A-Number : 

Riders:

Date: 10/09/2025 By: Rainieri, Robert, Court Staff

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

DOB: [REDACTED]
Event No: EPB2202000606

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

subject ID: [REDACTED] FINS: [REDACTED] File No: [REDACTED]

In the Matter of:

Respondent: RONALDO [REDACTED] v. [REDACTED] currently residing at:

705 Hanover St, Hamilton, OH 45011. BUTLER COUNTY JAIL
(Number, street, city, state and ZIP code) (Area code and phone number)

You are an arriving alien.

You are an alien present in the United States who has not been admitted or paroled.

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 GUATEMALA and a citizen of GUATEMALA;
3. You arrived in the United States at or near EL PASO, TX, on or about February 11, 2022;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

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:

212(a) (6) (A) (1) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

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:

705 Hanover St, Hamilton, OH 45011. 705 Hanover St, Hamilton, OH 45011
(Complete Address of Immigration Court, including Room Number, if any)

on November 28, 2025 at 1:00 pm to show why you should not be removed from the United States based on the
(Date) (Time)

charge(s) set forth above.

STEPHEN MATRJCIK - JUDGE
(Signature and Title of Issuing Officer)

Date: October 30, 2025 CLEVELAND, OH
(City and State)

EOIR - 1 of 4



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

Respondent Name:

V , RONALDO

A-Number:



Riders:

In Removal Proceedings

Initiated by the Department of Homeland Security

Date:

11/06/2025

To:

Marks, Carolyn A
9378 Mason Montgomery Road
#385
Mason, OH 45040

ORDER OF THE IMMIGRATION JUDGE

Respondent the Department of Homeland Security has filed a motion to terminate these proceedings, and the non-moving party was accorded notice and an opportunity to respond. The motion is opposed unopposed.

After considering the facts and circumstances, the immigration court orders that the motion to terminate is granted with without prejudice denied because:

- The Department of Homeland Security met did not meet its burden of proving by clear and convincing evidence that Respondent is removable as charged. 8 C.F.R. § 1240.8(a).
- Respondent met did not meet the burden of proving that Respondent is clearly and beyond a doubt entitled to admission to the United States and is not inadmissible as charged. 8 C.F.R. § 1240.8(b)-(c).
- Other.
- Further analysis/explanation:

Motion to be renewed at master calendar set for 11/25/25 at 1 PM. DHS to articulate position on Motion at renewal.

Immigration Judge: Riedthaler-Williams, Jennifer 11/06/2025

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

Appeal Due:

Certificate of Service

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

Respondent Name : V , RONALDO | A-Number :

Riders:

Date: 11/06/2025 By: Reveron, Krista, Court Staff

CERTIFICATE OF SERVICE

I, Carolyn A. Marks, hereby certify that the foregoing pleading was electronically filed on November 14, 2025, and will automatically be served on all the parties for whom counsel has entered an appearance.

A handwritten signature in black ink, appearing to read 'C. Marks', is written over a horizontal line.

Carolyn A. Marks (0092899)
Counsel for Petitioner
Admitted Pro Hac Vice