UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Yi Mei Zhen a/k/a Yi Mia Zheng, Petitioner, v. Kevin Raycraft,[1] the Acting Director of the Detroit ICE Field Office, Respondent.	)	CASE NO. 3:25-CV-01507 JUDGE PAMELA A. BARKER **RESPONDENT'S RETURN OF WRIT AND MOTION TO DISMISS**

INTRODUCTION

Petitioner Yi Mei Zhen entered the United States unlawfully, she has a final, valid order of removal, and her detention is lawful. This Court should deny the relief requested by Zhen and dismiss the Petition. Zhen has raised no issues subject to judicial review, pled no facts inconsistent with due process, and made no claims that her removal will not happen in the reasonably foreseeable future. Therefore, this Court should dismiss the petition under Federal Rules of Procedure 12(b)(1) for lack of subject matter jurisdiction.

FACTUAL BACKGROUND

Zhen brings this action as a petition for habeas corpus under 28 U.S.C. § 2241. (Petition ("Pet.") ¶ 11, ECF No. 1, PageID # 5.) Zhen, a Chinese national, was not lawfully admitted or paroled into the United States of America at any point in time. (Pet. ¶ 1; *see also* Declaration of Lucas Wandyg ("Wandyg Decl.") ¶ 5, Attached as Exhibit A.) Zhen is currently detained at the

[1] Kevin Raycraft is currently the ICE Detroit Field Office Director and is automatically substituted as a party pursuant to Fed. R. Civ. P. 25(d).

Corrections Center of Northwest Ohio in Stryker, Ohio. (Pet. ¶ 6; Wandyg Decl. ¶ 4.)

In 1993, Zhen unlawfully entered this country without an inspection. (Pet. ¶ 1, Wandyg Decl. ¶ 5.) She was apprehended the same day and served with an Order to Show Cause and a Hearing Notice. (*Id.*) In 2009, she had a merit hearing before an immigration judge who denied her application for withholding of removal. (Pet. ¶ 1.) The immigration judgment gave Zhen until May 12, 2010, to voluntarily depart the United States. (Wandyg Decl. ¶ 6.) Zhen appealed the immigration judge's decision to the Board of Immigration Appeals ("BIA"), which dismissed her appeal and gave Zhen 60 days to voluntarily depart. (Pet. ¶ 2, Wandyg Decl. ¶ 8.) Zhen then filed a petition for review with the Sixth Circuit Court of Appeals. (Pet. ¶ 3.)

When Zhen did not depart the United States within the 60-day period in the Voluntary Departure Order, the order was converted to a Deportation Order on October 2, 2011. (Wandyg Decl. ¶ 11.) On July 11, 2012, the Department of Homeland Security ("DHS") placed Zhen on an Order of Supervision and instructed her to obtain a passport. (Wandyg Decl. ¶ 13.)

On October 29, 2012, the Appellate Court upheld Zhen's deportation. (Pet. ¶ 17.) On April 15, 2013, United States Supreme Court denied Zhen's request for a writ of certiorari. (Wandyg Decl. ¶ 19.)

In 2018, Zhen filed a motion to reopen her deportation proceedings with the BIA, but that motion was denied as well. (*Id.* at ¶ 20.) On June 3, 2025, Zhen's supervision was revoked, and she was taken into custody based on her final order of deportation. (*Id.* at ¶ 21.) On June 5, 2025, Zhen filed a second motion to reopen with the BIA, which was rejected by the BIA on June 10, 2025. (*Id.* at ¶ 22.) On June 16, 2025, Zhen resubmitted the motion. (*Id.* at ¶ 23.) The motion is currently pending with the BIA. (*Id.* at ¶ 24.) Zhen is currently the beneficiary of an application for adjustment of status, however, as the form states largely at the top, "THIS NOTICE DOES

NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT." (Form I-797C, attached as Exhibit B to Pet., ECF No. 1, PageID #23.)

On July 2, 2025, Zhen was provided an application to complete in order for the U.S. Immigration and Customs Enforcement ("ICE") to obtain a travel document, and on July 1, 2025 ICE requested a travel document for Zhen from China. (*Id.* at ¶¶ 25, 26.) Thus, ICE believes there is a significant likelihood Zhen will be removed in the reasonably foreseeable future. (*Id.* at ¶ 27.)

Zhen filed this Petition on July 18, 2025, alleging that she has been unlawfully taken into custody and detained. She claims the Court has jurisdiction over her action under the Administrative Procedure Act, 28 U.S.C. § 2241 et seq.; Art I., § 9, Cl. 3 of the United States Constitution (the Suspension Clause), and common law. (Pet. ¶ 8.) She states this action arises under the Due Process Clause of the Fifth Amendment and the Immigration and Nationality Act ("INA".) *Id.* She seeks relief under the habeas corpus statutes, 28 U.S.C. § 2241 et. seq., the Declaratory Judgment Act, 28 U.S.C. § 2001 et seq. and the All Writs Act, 28 U.S.C. § 1651. *Id.*

LEGAL AND STATUTORY BACKGROUND

"The Immigration and Nationality Act (INA) establishes procedures for removing aliens living unlawfully in the United States." *Johnson v. Guzman Chavez*, 594 U.S. 523, 527 (2021). "If the immigration judge decides that the alien is inadmissible or deportable and that the alien is not entitled to any of the relief or protection that he requested, the immigration judge will issue an order of removal." *Id.* at 528 citing 8 U. S. C. § 1229a(c)(5).

The INA provides a statutory scheme for the civil detention of aliens pending a decision during removal proceedings as well as once a final order of removal has been entered. *See generally* 8 U.S.C. §§ 1225, 1226, 1231. The time and circumstances of entry, as well as the

stage of the removal process, determines where an alien falls within this scheme and whether detention of the alien is discretionary or mandatory.

The statute referring to a 90-day removal period, 8 U.S.C. § 1231(a)(1)(A), holds: "Except as otherwise provided in this section, when an alien is ordered removed, the Attorney General shall remove the alien from the United States within a period of 90 days (in this section referred to as the 'removal period')." *Martinez v. Larose*, 968 F.3d 555, 559 (6th Cir. 2020). "The removal period is defined as beginning on the latest of three events: (1) "[t]he date the order of removal becomes administratively final"; (2) "[i]f the removal order is judicially reviewed and if a court orders a stay of the removal of the alien, the date of the court's final order"; or (3) "[i]f the alien is detained or confined (except under an immigration process), the date the alien is released from detention or confinement." *Id.* at 559–60 citing 8 U.S.C. § 1231(a)(1)(B).

Regarding detaining an alien beyond the 90-day period, 8 USC § 1231(a)(6) states:

> An alien ordered removed who is inadmissible under section 1182 of this title, removable under section 1227(a)(1)(C), 1227(a)(2), or 1227(a)(4) of this title or who has been determined by the Attorney General to be a risk to the community or unlikely to comply with the order of removal, may be detained beyond the removal period and, if released, shall be subject to the terms of supervision in paragraph (3).

"§ 1231(a)(3) allows for supervised release after the 90-day removal period expires '[i]f the alien does not leave or is not removed' during that time period." *Johnson v. Guzman Chavez*, 594 U.S. 523, 538 (2021).

Once the 90-day removal period has elapsed, the alien becomes subject to 8 USC § 1231(a)(6) which makes detention discretionary. *Jimenez v. Cronen*, 317 F. Supp. 3d 626, 639 (D. Mass. 2018). "Continued detention under this provision creates the 'post-removal-period.'" *Id.* "[I]n enacting § 1231, Congress and the President anticipated that not all aliens ordered

removed would be deported during the removal period. *See* § 1231(a)(3)(referring to 'an alien' who 'does not leave ... within the removal period')." *Jimenez v. Cronen*, 317 F. Supp. 3d 626, 651 (D. Mass. 2018). Thus, 8 U.S.C. § 1231 expressly anticipates detention beyond the 90-day removal period.

LAW AND ARGUMENT

Zhen's petition seeks relief in the form of release from detention and ultimately seeks to avoid her pending removal. Despite having a valid final order of removal, Zhen argues that her detention is not authorized because her final order has somehow expired. She concedes her detention could be based on 8 U.S.C. § 1231(a)(6) which states in pertinent part: "An alien ordered removed who is inadmissible under section 1182 of this title, removable under section 1227(a)(1)(C), 1227(a)(2), or 1227(a)(4) of this title … may be detained beyond the removal period …" (Pet. ¶ 15.) She argues that since she was not detained during her 90-day removal period, that period has expired, and she should not be detained now. (*Id.* at ¶ 21.) However, there is no authority supporting Zhen's assertion. Zhen is essentially asking this Court to stop her removal, which this Court has no jurisdiction to do. Thus, the Court should dismiss her Petition.

I. STANDARD OF REVIEW

The jurisdiction of the federal courts is presumptively limited. *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994). Federal courts are courts with limited jurisdiction and may only hear cases that are "authorized by Constitution and statute." *Id.* If at any time, the court determines that it lacks subject-matter jurisdiction, that court must dismiss the action in front of them. *Mich. Emp't Sec. Comm'n v. Wolverine Radio Co.*, 930 F.2d 1132 (6th Cir. 1991).

The requirement that a plaintiff establish subject-matter jurisdiction "as a threshold matter 'spring[s] from the nature and limits of the judicial power of the United States' and is 'inflexible

and without exception.'" *Steel Co. v. Citizens for a Better Env't*, 523 U.S. 83, 95 (1998) (some internal quotation marks omitted).

A motion under Fed. R. Civ. P. 12(b)(1) can raise facial or factual attacks. *W6 Rest. Grp., Ltd v. Loeffler*, 140 F.4th 344, 349 (6th Cir. 2025). Regardless of which attack is used, the plaintiff bears the burden of persuading the Court that subject matter jurisdiction exists. *Dismas Charities, Inc. v. U.S. Dep't of Justice*, 401 F.3d 666, 671 (6th Cir. 2005).

II. ZHEN'S CUSTODY IS NOT IN VIOLATION OF THE CONSTITUTION OR LAWS OR TREATIES OF THE UNITED STATES.

The Court lacks jurisdiction to challenge Zhen's removal under 8 U.S.C. § 1252. For these reasons, this Court should deny the Petition and dismiss this action for lack of subject-matter jurisdiction. In 8 U.S.C. § 1252(g) through the REAL ID Act, Congress limited the jurisdiction of federal courts as follows:

> Except as provided in this section and notwithstanding any other provision of law (statutory or nonstatutory), *including section 2241 of title 28,* or any other habeas corpus provision, and sections 1361 and 1651 of such title, no court shall have jurisdiction to hear any cause or claim by or on behalf of any alien arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or *execute removal orders* against any alien under this chapter.

8 U.S.C. § 1252(g) (emphasis added). "In the REAL ID Act, Congress decided that, as a matter of public policy, [federal courts] do not have jurisdiction to decide claims that arise from the decision of the Executive Branch to execute a removal order." *Rranxburgaj v. Wolf,* 825 F. App'x 278,283 (6th Cir. 2020). This holds true "whether or not [federal courts] agree with ICE's decision to execute [a petitioner's] removal order." *Id.*

8 U.S.C. § 1252(g) therefore limits jurisdiction as it relates to claims arising from such execution of removal orders—even if federal question jurisdiction would otherwise be proper. *See Elgharib v. Napolitano,* 600 F.3d 597, 607 (6th Cir. 2010). By its terms, this statutory limitation also applies to habeas relief under 28 U.S.C. § 2241, which would typically provide

jurisdiction over cases where an alien is held in custody in violation of the Constitution or the laws of the United States. *Zadvydas v. Davis,* 533 U.S. 678, 687 (2001).

Thus, to obtain habeas relief, Zhen must not merely show that she is "in custody," but rather that she is "in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(3); see also *Dickerson v. United States*, 530 U.S. 428, 439, n. 3 (2000) ("Habeas corpus proceedings are available only for claims that a person 'is in custody in violation of the Constitution or laws or treaties of the United States,'" quoting 28 U.S.C. § 2254(a).). Zhen cannot meet this burden. Thus the Court lacks jurisdiction and the Petition should be dismissed.

A. THERE IS NO TIME LIMIT ON ENFORCING ZHEN'S ORDER OF REMOVAL.

Zhen does not contest the fact that she has valid removal order. She argues that because the Respondent did not detain her within the 90-day removal period following the date the order became final, it has forfeited its opportunity and has no authorization to detain (and consequently remove) her now. However, immigration officials retain discretion not to execute a final order of removal within 90 days. *Arizona v. Biden*, 40 F.4th 375, 391 (6th Cir. 2022). "Immigration authorities, as the Supreme Court has made clear, have considerable discretion over whom to arrest and remove." *Arizona v. Biden*, 40 F.4th 375, 391 (6th Cir. 2022) citing *Arizona v. U.S.*, 567 U.S. 387, 396 (2012). Just because immigration authorities did not remove Zhen within 90 days of her removal order, does not mean they cannot remove her now. Her final order of removal remains valid.

Zhen relies on the language in 8 U.S.C. § 1231(a)(1)(A) which states "when an alien is ordered removed, the Attorney General shall remove the alien from the United States within a period of 90 days." The Sixth Circuit addressed this issue and found:

"Except as otherwise provided," it says that, "when an alien is ordered removed, the Attorney General shall remove the alien from the United States within a period of 90 days." *Id.* But Congress itself appreciated that removal would not always occur within 90 days. It permitted supervised release—release from custody—"[i]f the alien does not leave or is not removed within the removal period." *Id.* § 1231(a)(3). Combined with the basic principle that "[a]t each stage" of the removal process, "the Executive has discretion to abandon the endeavor" to remove someone, *Reno*, 525 U.S. at 483, 119 S.Ct. 936, *all of this means that immigration officials retain some discretion not to execute a final order of removal within 90 days.*

Arizona v. Biden, 40 F.4th 375, 391 (6th Cir. 2022) (emphasis added). Indeed, "the use of 'shall' does not automatically create a judicially enforceable mandate, especially when criminal or civil law enforcement is at issue." *Id.* citing *Town of Castle Rock v. Gonzales*, 545 U.S. 748, 761–62, 125 S.Ct. 2796, 162 L.Ed.2d 658 (2005). The only authority Zhen cites to support her interpretation of the language are inapplicable traffic stop cases. (Pet. ECF No. 1, PageID # 9-10.)

In keeping with the discretion afforded in 8 U.S.C. § 1231(a)(3), ICE released Zhen was released on an Order of Supervision after her removal period expired. DHS regulations then permitted ICE to revoke the supervised released and detain Zhen in order to effectuate her removal. *See* 8 C.F.R. § 241.4. Such regulation addresses the procedure of revocation of release after the removal period. It states in pertinent part: "Release may be revoked in the exercise of discretion when, in the opinion of the revoking official…it is appropriate to enforce a removal order…" (8 C.F.R. § 241.4(l)(2)(iii)). That is precisely what happened here. ICE is enforcing Zhen's Order of Removal and removing her to China. It is within ICE's authority to end her supervised release and detain her while they process her removal.

Recently a petitioner in another district court case made the same argument as Zhen, and the court rejected this argument. Touni Ghamelian filed a Writ of Habeas Corpus on July 1, 2025, after he was detained when his order of supervision was revoked after living in this

country for 40 years. *Ghamelian v. Baker,* No. SAG-25-02106, 2025 WL 2049981 at *1 (D. Md. July 22, 2025) *reconsideration denied sub nom. Ghamelian v. Baker,* No. CV SAG-25-02106, 2025 WL 2074155 (D. Md. July 23, 2025). Ghamelian argued, like Zhen, that his 90-day statutory removal period under 8 U.S.C. § 1231 plus the consecutive additional three-month period permitted under *Zadvaydas* expired many years ago. *Id.* at *4. The court said it found "no support for that reading in *Zadvydas* or the text of § 1231(a)(6)." *Id.* The court held that *Zadvaydas* did not "purport to create some sort of limitations period for § 1231(a)(6) detention." *Id.* "In the end, then, neither the language of § 1231(a)(6) nor *Zadvydas* supports the notion that the government's ability to detain Petitioner expired in the late 1990s." *Id.* The court denied Ghamelian's petition. *Id.* This Court should adopt the rationale in *Ghamelian.* Here, Zhen was also under an order of supervision as provided under 8 U.S.C. § 1231(a)(3), and Zhen similarly argues that the government must either remove an alien within 90 days or forever relinquish its ability to remove the alien at all. As the Maryland district court recognized, neither 8 U.S.C. § 1231 nor any applicable authority support such a notion.

Finally, and contrary to Zhen's assertions, the Supreme Court's decision in *Zadvydas v. Davis* does not create a time limitation to her Order of Removal. *See* 533 U.S. 678 (2001). In fact, *Zadvaydas* does not apply to her case at all as her removal is reasonably foreseeable and she has not argued that it is not. "When a removal is foreseeable, detention does not violate due process as set out in *Zadvydas v. Davis*, 533 U.S. 678 (2001)." *Martinez v. Larose*, 968 F.3d 555, 557 (6th Cir. 2020). "Since *Zadvydas* came down, the Supreme Court has clarified that the *Zadvydas* due process analysis applies only if a danger of indefinite detention exists and there is no significant likelihood of removal in the reasonably foreseeable future." *Jiang Lu v. U.S. ICE*, 22 F. Supp. 3d 839, 843 (N.D. Ohio 2014).

Zadvydas does not apply to this case, and Zhen's detention does not violate the Constitution or laws or treaties of the United States. Consequently, this Court lacks subject matter jurisdiction, and the Petition should be dismissed.

B. ZHEN WAS AFFORDED ALL DUE PROCESS.

Zhen's argument that her right to due process was violated is also without merit. "[A]n alien who tries to enter the country illegally is treated as an 'applicant for Admission.'" *Dep't of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 140 (2020), citing 8 U.S.C. § 1225(a)(1). An applicant for admission "has only those rights regarding admission that Congress has provided by statute." *Id.* For applicants for admission, "Congress provided the right to a 'determin[ation]' whether he had 'a significant possibility' of 'establish[ing] eligibility for asylum'". *Id.*, citing 8 U.S.C. §§ 1225(b)(1)(B)(ii), (v). "Because the Due Process Clause provides nothing more, it does not require review of that determination or how it was made." *Id.*

The Supreme Court has also long recognized that immigration-related decisions of executive branch officers as in Zhen's case afford due process in the absence of judicial review. "[A]s to 'foreigners who have never been naturalized, nor acquired any domicil or residence within the United States, nor even been admitted into the country pursuant to law,' 'the decisions of executive or administrative officers, acting within powers expressly conferred by Congress, are due process of law.'" *Thuraissigiam*, 591 U.S. at 138, quoting *Nishimura Ekiu v. United States*, 142 U.S. 651, 660 (1892). "Since then, the [Supreme] Court has often reiterated this important rule." *Id.*, citing *United States ex rel. Knauff v. Shaughnessy*, 338 U.S. 537, 544 (1950), *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 210 (1953), and *Landon v.*

Plasencia, 459 U.S. 21, 32 (1982) ("This Court has long held that an alien seeking initial admission to the United States requests a privilege and has no constitutional rights regarding his application, for the power to admit or exclude aliens is a sovereign prerogative").

The essential requirements of procedural due process are: (1) notice; and (2) an opportunity to be heard. *Goldberg v. Kelly*, 397 U.S. 254, 267-68 (1970); *Gorman v. Univ. of R.I.*, 837 F.2d 7, 12 (1st Cir. 1988). Zhen does not demonstrate that she has been deprived of these requirements. Zhen does not contest that she unlawfully entered the United States. She cannot contest that she has had ample opportunity to appeal and challenge her removal proceedings in immigration court, in the BIA, and before the Sixth Circuit Court of Appeals. Zhen also cannot contest that she has a final order of removal, which was consistently upheld. Thus, her due process claim must fail.

C. THE COURT HAS NO JURISDICTION TO CHALLENGE ZHEN'S REMOVAL OR THAT SHE IS INADMISSIBLE.

In an attempt to challenge her removal, Zhen then asks the Court to reconsider her status as "inadmissible" because she claims that she was conditionally "paroled" into the United States. (Pet. ¶¶35-38.) This argument is also baseless. In her 2009 deportation proceedings, Zhen conceded deportability in accordance with INA § 241(a)(1)(B) which is 8 U.S.C. § 1231. (Deportation Proceedings Order, attached as Exhibit C to Pet., ECF No. 1, PageID #25.) 8 U.S.C. § 1252(f)(1) bars review of this determination and Zhen's status cannot now be relitigated in this Court.

Ultimately, Zhen is challenging her detention because she is challenging her imminent removal. Section 1252(g) bars claims arising from the three discrete actions identified in § 1252(g), including, as relevant here, the decision or action to "execute removal orders."

Congress spoke clearly, emphatically, and repeatedly, providing that "no court" has jurisdiction

over "any cause or claim" arising from the execution of removal orders, "notwithstanding any other provision of law," whether "statutory or nonstatutory," including habeas, mandamus, or the All Writs Act. 8 U.S.C. § 1252(g). Accordingly, by its terms, this jurisdiction-stripping provision precludes habeas review under 28 U.S.C. § 2241 (as well as review pursuant to the All Writs Act and Administrative Procedure Act) of claims arising from a decision or action to "execute" a final order of removal. See *Reno v. American-Arab Anti-Discrimination Committee ("AADC")*, 525 U.S. 471, 482 (1999).

The Sixth Circuit and including other Courts of Appeals have consistently held that similar petitioners' challenges to removal are barred by § 1252(g). *Hamama v. Adducci*, 912 F.3d 869, 874–77 (6th Cir. 2018) (vacating district court's injunction staying removal, concluding that § 1252(g) stripped district court of jurisdiction over removal-based claims and remanding with instructions to dismiss those claims); *see also Rauda v. Jennings*, 55 F.4th 773, 778 (9th Cir. 2022); *Camarena v. Dir., ICE*, 988 F.3d 1268, 1274 (11th Cir. 2021) ("[W]e do not have jurisdiction to consider 'any' cause or claim brought by an alien arising from the government's decision to execute a removal order. If we held otherwise, any petitioner could frame his or her claim as an attack on the government's authority to execute a removal order rather than its execution of a removal order."); *E.F.L. v. Prim*, 986 F.3d 959, 964-65 (7th Cir. 2021) (rejecting the argument that jurisdiction remained in similar circumstances because petitioner was challenging, DHS's legal authority as opposed to its "discretionary decisions"); *Tazu v. Att'y Gen., U.S.*, 975 F.3d 292, 297 (3d Cir. 2020) (observing that "the discretion to decide whether to execute a removal order includes the discretion to decide when to do it" and that "[b]oth are covered by the statute") (emphasis in original); *Silva v. United States*, 866 F.3d 938, 941 (8th Cir. 2017) (Section 1252(g) applies to constitutional claims arising from the execution of a final

order of removal, and language barring "any cause or claim" made it "unnecessary for Congress to enumerate every possible cause or claim").

The Court lacks jurisdiction to reconsider Zhen's status and pending removal and her Petition must be dismissed.

III. ZHEN HAS NOT NAMED THE PROPER PARTY RESPONDENT

Zhen only named the Acting Director of the ICE Detroit Field as the Respondent. "[I]n habeas challenges to present physical confinement the default rule is that the proper respondent is the warden of the facility where the prisoner is being held, not the Attorney General or some other remote supervisory official." *Rumsfeld v. Padilla*, 542 U.S. 426, 435 (2004). The habeas statute "straightforwardly provides that the proper respondent to a habeas petition is 'the person who has custody over [the petitioner].'" *Id.* at 434 (quoting 28 U.S.C. § 2242); *see also* 28 U.S.C. § 2243 ("The writ, or order to show cause shall be directed to the person having custody of the person detained") (emphasis added). Moreover, its long-standing interpretation "'contemplate[s] a proceeding against some person who has the *immediate custody* of the party detained, with the power to produce the body of such party before the court or judge, that he may be liberated if no sufficient reason is shown to the contrary.'" *Padilla*, 542 U.S. at 435 (quoting *Wales v. Whitney*, 114 U.S. 564, 574 (1885)) (emphasis in *Padilla*). As Zhen has not named the warden of the facility where she is detained, her Petition should be dismissed.

CONCLUSION

Because Zhen's detention does not violate the Constitution or the laws of the United States and because she did not name the proper Respondent, this Court must deny relief and dismiss the action.

Respectfully submitted,

DAVID M. TOEPFER
United States Attorney

By: *s/ Rema A. Ina*
Rema A. Ina (# 0082549)
Assistant U.S. Attorney
Carl B. Stokes U.S. Courthouse
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113-1852
(216) 622-3723
(216) 522-4982 (Facsimile)
Rema.Ina@usdoj.gov

Attorney for Respondent