

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

ISSA LY,	:	Case No. 1:25-cv-00958
	:	
Petitioner,	:	
	:	District Judge Jeffery P. Hopkins
v.	:	
	:	Magistrate Judge Elizabeth P. Deavers
KEVIN RAYCRAFT,	:	
Field Office Director for Enforcement	:	
And Removal Operations, United States	:	
Immigration and Customs Enforcement,	:	
Department of Homeland Security, <i>et al.</i> ,	:	
	:	
Respondents.	:	

PETITIONER ISSA LY’S REPLY TO RESPONDENTS’ RETURN OF WRIT

Petitioner Issa Ly (“Petitioner” or “Issa”), by and through his undersigned *pro bono* attorney, respectfully submits this reply to the Respondents’ opposition to his Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. Issa was abruptly taken into the custody of the Department of Homeland Security’s Immigration and Customs Enforcement Custody (“ICE”) on October 23, 2025, in violation of his Due Process Rights under the Fifth Amendment, as well as other applicable statutes and regulations.

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ARGUMENT

Respondents argue that this Court lacks jurisdiction pursuant to 8.U.S.C. § 1252. *See* ECF No. 12, PageID 47. Issa respectfully disagrees. § 1252 does not strip this Court of jurisdiction because Issa is not challenging the merits of his removal order but rather his unlawful detention. Respondents further argue that Immigration and Customs Enforcement (“ICE”) properly detained Issa on October 23, 2025 to effectuate his final order of removal pursuant to their authority under 8 U.S.C. § 1231. *See* ECF No. 12, PageID 43-45. Issa respectfully disagrees that he was properly detained. ICE had not met its burden to show that it was significantly likely for him to be returned to Mauritania when he was taken into custody after ICE had been unable to return him to Mauritania for the past several years. *See* 8 C.F.R. § 241.13(i)(2). When ICE re-detained him, ICE had not introduced any specific evidence showing how (or when) any relevant circumstances

had changed so that Petitioner could be removed. Individuals cannot be re-detained without warning after years of supervised release simply because ICE says it can now effectuate a removal without an individualized showing of how they are able to do so and whether, even if they are, re-detention is actually necessary to effectuate the removal. Petitioner will now address each of Respondents' arguments in turn.

I. THIS COURT HAS JURISDICTION

A. 8 U.S.C. § 1252 Does Not Strip this Court of Jurisdiction

Issa is not challenging the *execution* of his removal order. Rather, he is challenging the unconstitutional deprivation of personal liberty that ICE chose to employ as an *antecedent* to executing the removal order. Respondents' argue that this Court does not have subject matter jurisdiction because 8 U.S.C. § 1252 precludes review. *See* ECF No. 12, PageID 45-47.

8 U.S.C. § 1252(g) provides the following:

“[e]xcept as provided in this section and notwithstanding any other provision of law (statutory or nonstatutory), . . . no court shall have jurisdiction to hear any cause or claim by or on behalf of any [non-citizen] arising from the decision or action by [ICE] to commence proceedings, adjudicate cases, or execute removal orders against any [non-citizen] under this chapter.”

8 U.S.C. § 1252(g). The Supreme Court “narrow[ly] read[]” § 1252 and held that it does not encompass “all claims arising from deportation proceedings.” *Barrios v. Ripa*, No. 1:25-CV-22644, 2025 WL 2280485, at *4 (S.D. Fla. Aug. 8, 2025) (citing *Reno v. Am-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 482, 487 (1999)). Rather, it only blocks courts from having jurisdiction over claims arising from three “discrete actions”—“to commence proceedings, *adjudicate* cases, or *execute* removal orders.” *Barrios*, 2025 WL 2280485 at *4. Accordingly, claims that do not seek “review of an order of removal, the

decision to seek removal, or the process by which removability will be determined” are not barred by § 1252(g). *Elgharib v. Napolitano*, 600 F.3d 597, 605 (6th Cir. 2010); *see also Hamama v. Adducci*, 912 F.3d 869, 877 (6th Cir. 2018) (A “district court’s jurisdiction over the detention-based claims is independent of its jurisdiction over the removal-based claims.”); *Jennings v. Rodriguez*, 583 U.S. 281, 293 (2018) (“The Government’s argument that the Court is barred from adjudicating a challenge to detention as inherently implicating a challenge to removal is incorrect, and, if left unchecked, would lead to “absurd” results.”); *Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 152 (W.D.N.Y. May 2, 2025) (The court observed that detention related to a final order of removal “always is related to the execution of an immigration order, but courts routinely hear habeas petitions filed by individuals challenging detention during the removal process.”) (citing *Jennings*, 583 U.S. 281, 292-95).

The court in *Barrios v. Ripa* concluded that § 1252(g) deprived it of subject-matter jurisdiction over Respondents’ decision to revoke the OSUP, but not their purported failure to comply with their own procedures in doing so. *Barrios*, 2025 WL 2280485, at *4.

Petitioner does not challenge the Respondents’ authority or discretion to enforce the final order of removal. Petitioner is requesting this Court review and determine that his Order of Supervision was unlawfully revoked and his continued detention violates his Fifth Amendment rights. “Such claims do not fall within the three enumerated categories set forth in § 1252(g).” *Hammouda v. Department of Homeland Security*, No. 4:2025-CV-02696, at *5-6 (N.D. Ohio Jan. 13, 2026) (Order denying motion on other grounds).

Respondents' reference to the *Kellici* decision establishing that a habeas petition is proper where "the petition did not address the merits of the underlying order of removal," *Kellici v. Gonzalez*, 472 F.3d 416, 419-20 (6th Cir. 2006); *See* ECF No. 12, PageID 49. Much like the petitioner in the *Kellici* decision, here, Petitioner has not referenced or mentioned the merits of his final order of removal. Petitioner's only mention of his final order of removal was in his statement of facts and procedural history. *See* ECF 1, PageID 6, ¶¶31-32. Petitioner is not relitigating the merits of his order of removal. The jurisdiction-stripping provisions of § 1252(g) do not apply to this habeas petition.

B. Petitioner's Claims are Not Barred by Sections 1252(a)(5) and (b)(9)

This Court retains jurisdiction over Petitioner's claims despite 8 U.S.C. § 1252(a)(5) and (b)(9). § 1252(a)(5) provides that "[n]otwithstanding any other provision of law (statutory or nonstatutory) . . . or any other habeas corpus provision . . . a petition for review filed with an appropriate court of appeals in accordance with this section shall be the sole and exclusive means for judicial review of an order of removal"

As Respondents' reference, the Sixth Circuit has explained that district courts "are prohibited from reviewing and vacating a removal order." *Hamdi v. Napolitano*, 620 F.3d 615, 625 (6th Cir. 2010). Here, however, Petitioner is not challenging the merits of his removal order or requesting review of his final order of removal.

8 U.S.C. § 1252(b)(9) provides that "[j]udicial review of all questions of law and fact . . . arising from any action taken or proceedings brought to remove a [non-citizen] from the United States under this subchapter shall be available only in judicial review of a final order."

The court in *Ceesay* concluded that because Ceesay was not challenging the legality of his removal order, but instead was arguing that “his detention was unlawful because the government improperly revoked the order of supervision under which he had been released for more than a decade,” neither § 1252(b)(9) nor § 1252(g) precluded the court from exercising jurisdiction over his petition. *Ceesay*, 781 F. Supp. 3d at 153-54. The court first found that Ceesay was not seeking a stay of removal, which would be barred by section 1252(g) and went on to reject the government’s argument that because the stated purpose of his detention was to effectuate his removal, the case “stems from” his removal and was thus jurisdictionally barred, finding that it “proves far too much.” *Id.* at 151. Petitioner asserts that the revocation of his release and subsequent detention was done without adequate process and in violation of the Constitution and ICE’s own regulations. Therefore, this Court does not lack jurisdiction to review Petitioner’s challenge to his unlawful detention. *See Mantena v. Johnson*, 809 F.3d 721 (2d Cir. 2015) (Noting “even when a statute strips jurisdiction over a substantive discretionary decision, it does not strip jurisdiction over procedural challenges”).

II. PETITIONER IS NOT LAWFULLY DETAINED PURSUANT TO 8 U.S.C. § 1231.

The parties agree that Petitioner’s prior order of removal was final in 2011 such that he is now outside of the 90-day removal period during which the government “shall detain” the individual under 8 U.S.C. § 1231(a)(2). Regardless of the statutory authority for detention, once Petitioner was released under an Order of Supervision, ICE could only re-detain him by complying with specific constitutional, statutory, and regulatory requirements, which it did not do in this case, as Petitioner will now explain.

III. ICE'S REVOCATION OF RELEASE DOES NOT COMPLY WITH THE DUE PROCESS CLAUSE OF THE CONSTITUTION AND REGULATIONS.

The notice and informal interview provisions in § 241.4(1)(1) apply to revocations under 241.4(1)(2)(iii). *Constantinovici v. Bondi*, Case No. 3:25-CV-2405, 2025 WL 2898985 (S.D. Cal. October 10, 2025). Whether or not it was a proper exercise of ICE's discretion to revoke an Order of Supervision under the specific facts and circumstances this case presents is not relevant in light of the fact that ICE did not follow its own procedures, giving rise to Petitioner's meritorious and justiciable claims of *ultra vires* action, APA and *Accardi* violations.

A. ICE Did Not Comply with Notice Requirement Pursuant to 8 C.F.R. § 241.4.

The regulations under § 241.4 and § 241.13 require notice to be provided regarding the reasons for revocation of release. *See* 8 C.F.R. § 241.4(1)(3)(iii) and 8 C.F.R. § 241.13(i)(3).

Respondents provided Issa with a Notice of Revocation of Release on October 23, 2025 stating that Petitioner's order of supervision was revoked due to a "determination that there are changed circumstances". *See* Respondents' Exh. F, ECF No. 12-6, PageID 83; *see also* 8 C.F.R. § 241.13(i)(2) (Revocation for removal). The notice incorrectly stated "[o]n 10/04/2023" Petitioner was "ordered removed to Venezuela" and his case was "under current review by Venezuela for the issuance of a travel document." *Id.* Respondents quickly understated the significant number of errors in the Notice of Revocation provided to Petitioner. *See* ECF No. 12, PageID 56. Petitioner was not ordered removed on 10/04/2023 and he was not ordered removed to Venezuela. *See* Respondents' Exh. C, ECF No. 12-3, PageID 71. The Respondents provided Deportation

Officer Peng's declaration in which he affirms that it was not until November 10, 2025 that ICE requested a travel document for Petitioner. *See* Respondents' Exh. A, ECF No. 12-1, PageID 67, ¶22.

The notice is deficient as it incorrectly states when Petitioner was ordered removed, the country to which he was ordered removed, and the state of review of his case. This notice is constitutionally defective and must be subjected to high scrutiny. Therefore, Petitioner was not provided with adequate notice of revocation of his order of supervision and release.

B. ICE Did Not Comply with the Informal Interview Requirement Pursuant to 8 C.F.R. § 241.4 and § 241.13.

Respondents argue that Petitioner did not need to be afforded an informal interview because 8 C.F.R. § 241.4(1)(1) does not apply to revocations under 8 C.F.R. § 241.4 (1)(2). *See* ECF No. 12, PageID 55. Courts have held that an interview is required regardless of the reason for the revocation. *Ceesay*, 781 F. Supp. 3d 163-64 (citing *Noem v. Abrego Garcia*, 145 S. Ct. 1017, 1019 (2025) (Sotomayor, J. statement respecting the Court's disposition of the application); *M.Q. v. United States*, 776 F. Supp. 3d 180, 190 n.1 (S.D.N.Y. 2025); *Doe v. Smith*, 2018 WL 4696748 (D. Mass. Oct. 1, 2018).

Respondents argue that Issa was provided with due process since detention is required to be reviewed on an on-going-basis pursuant to 8 C.F.R. § 241.4. *See* ECF No. 12, PageID 59. However, § 241.4(3) provides the following:

If the alien is not released from custody **following the informal interview** provided for in paragraph (1)(1) of this section, the HQPDU Director shall schedule the review process in the case of an alien whose previous release or parole from immigration custody pursuant to a decision of either the district director, Director of the Detention and Removal Field Office, or Executive Associate Commissioner under the procedures in this section has been or is subject to being revoked. The

normal review process will commence with notification to the alien of a records review and scheduling of an interview, which will ordinarily be expected to occur within approximately three months after release is revoked.

8 C.F.R. § 241.4(1)(3) (emphasis added). The Notice to Alien of Custody Review provided to Issa does not comply with due process since Issa was not provided with any prompt informal interview following his detention on October 23, 2025. The Notice of Revocation of Release provided to Issa clearly states “[P]ursuant to 8 C.F.R. § 241.4 / 8 C.F.R. § 241.13, you are to remain in ICE custody at this time. You will **promptly be afforded an informal interview** at which you will be **given an opportunity to respond** to the reasons for the revocation... If you are **not released after the informal interview**, you will receive notification of a new review, which will occur within approximately three months of the date of this notice. (emphasis added). *See* Respondents’ Exh. F, ECF No. 12-6, PageID 83.

8 C.F.R. § 241.13(i)(2) governing revocation of release provides as follows:

The Service may revoke an alien's release under this section and return the alien to custody if, **on account of changed circumstances**, the Service determines that there is a significant likelihood that the alien may be removed in the reasonably foreseeable future. Thereafter, if the alien is not released from custody **following the informal interview provided for in paragraph (h)(3) of this section**, the provisions of § 241.4 shall govern the alien's continued detention pending removal.

8 C.F.R. § 241.13. (emphasis added). § 241.13(i)(3) further provides “[u]pon revocation, the alien will be notified of the reasons for revocation of his or her release. The Service will conduct an initial informal interview promptly after his or her return to Service custody to afford the alien an opportunity to respond to the reasons for revocation stated in the notification.”

Respondents argue that because Issa was provided with a biographical questionnaire for his custody review on December 31, 2025 it is the equivalent of an informal interview. *See* ECF No. 12, PageID 56. A biographical questionnaire for the purposes of a custody review does not satisfy the initial requirement of being promptly provided with an informal interview. Petitioner's detention, per his Notice of Revocation of Release, was pursuant to both 8 C.F.R. § 241.4 / 8 C.F.R. § 241.13. *See* Respondents' Exh. F, ECF No. 12-6, PageID 83. Respondents violated their own regulations by failing to provide Petitioner with a prompt informal interview following his arrest.

C. Petitioner's Revocation of his OSUP was Not Authorized by the Proper Authority Pursuant to § 241.4(l)(2).

Respondents incorrectly allege that Petitioner has no basis in his claim that the official responsible for revoking Petitioner's order of supervision had not been delegated the authority to revoke an order of supervision. *See* ECF No. 12, PageID 63.

8 C.F.R. § 241.4(l)(2) empowers the INS "Executive Associate Commissioner" to revoke release on discretion when, in his or her opinion: "(i) The purposes of release have been served; (ii) The alien violates any condition of release; (iii) It is appropriate to enforce a removal order . . . ; or (iv) The conduct of the alien, or any other circumstance, indicates that release would no longer be appropriate."

A "district director" or any other official who is "delegated the function or authority . . . for a particular geographic district, region, or area" may also revoke an order of supervision, 8 C.F.R. § 1.2., but only upon findings that "revocation is in the public interest and circumstances do not reasonably permit referral of the case to the Executive Associate Commissioner." 8 C.F.R. § 241.4(l)(2). The *Ceesay* court explained, when the Homeland Security Act of 2002 transferred INS functions to DHS, the authority

of the Executive Associate Commissioner to revoke release was conferred on the Executive Associate Director of ICE, and the authority of the district director was transferred to the Field Office Director. *Ceesay*, 781 F. Supp. 3d at 159-61. In *Ceesay*, the court concluded, for two reasons, that the person who revoked Ceesay's release, the Assistant Field Office Director, did so without clear authority. *Id.* at 161-162. First, the delegation order granting the Assistant Field Officer Director some authority did not specifically delegate the authority to revoke an order of supervision. *Id.* Second, the court found that the Assistant Field Officer Director did not make the findings required to support a release revocation: that revocation was in the public interest and circumstances did not reasonably permit referral of the case to the Executive Associate Director of ICE. *Id.* at 162.

Here, the Notice of Revocation of Release was signed by Deportation Officer ("DO") Gregory Lambert. *See* Respondents' Exh. F, ECF No. 12-6, PageID 83. Respondents argue that because the notice uses past-tense and does not state that it is the ICE Deportation Officer revoking the order of supervision at that moment it means that the officer that signed the document was not the person revoking the OSUP. *See* ECF no. 12, PageID 63. Respondents are essentially arguing that a signature on a document that contains past tense language is therefore irrelevant and does not provide any legitimization to the document. Respondents have not provided any documentation showing the Deportation Officer that signed the Notice of Revocation of Release was authorized to do so pursuant to § 241.4(l)(2).

There is no reason why Respondents could not have submitted documents with their Return of Writ to the Court demonstrating the proper authority had been delegated

to the Deportation Officer who signed the Notice of Revocation. *See Ceesay*, 781 F. Supp. 3d at 162 (Petitioner was released because “there [was] no delegation order clearly giving [the official] the authority to revoke release[.]”

IV. PETITIONER HAS BEEN PREJUDICED BY ICE’S VIOLATION OF HIS DUE PROCESS RIGHTS.

Respondents argue that Petitioner cannot demonstrate that he was substantially prejudiced to establish a due process violation because the outcome will not change, relying on multiple decisions from the Sixth Circuit. *See* ECF No. 12, PageID 60-63. Petitioner respectfully disagrees. Petitioner is not challenging his final order of removal or his removal from the United States. Petitioner is challenging his detention and Petitioner’s case is distinct from the caselaw relied upon by Respondents.

In *Surovtsev v. Noem*, where petitioner had been convicted of armed carjacking, the court found Ukraine had provided the petitioner with a travel document application and respondents had evidence of a plan to remove petitioner to a third country if his travel document was denied. Case No. 1:25-CV-160, 2025 WL 3264479 at *1 (N.D. Tex. Oct. 31, 2025). In Issa’s case, Respondents have not shown there have been any changed circumstances in regards to Mauritania or any progress made in obtaining a travel document for Petitioner. In *Karki v. Raycraft*, (E.D. Mich. Dec. 8, 2025) the petitioner was detained after the Government of Bhutan had issued him a travel document. *Karki*, 2025 WL 3516782, at *1. The court therefore found “[B]ecause there is a significant likelihood that Karki will be removed to Bhutan in the reasonably foreseeable future, Karki’s detention is lawful.” *Id.* The facts in *Karki* are substantially different from Petitioner’s case. In *Karki*, petitioner “moved to reopen his immigration case, requested a stay of his removal in the Atlanta Immigration Court, appealed the Immigration Court’s

order denying the motion to reopen and the motion to stay to the Board of Immigration Appeals (BIA), filed a habeas petition in the Southern District of Ohio, filed the instant habeas petition in the Eastern District of Michigan, appealed the BIA's decision to the Eleventh Circuit, and had a hearing before an Article III judge” all within the same year after he had been detained by ICE. *Id.* at *6. The court found “Karki cannot change the fact that the Government is ready, willing, and able to remove him to Bhutan. It purchased plane tickets just prior to the issuance of this order.” *Id.* at *7. Here, Respondents only showing of being able to remove Petitioner is a single request for a travel document made on November 10, 2025 and the boiler plate language in the Deportation Officer’s declaration with no other evidence. *See* Respondents’ Exh. A, ECF No. 12-1, PageID 67, ¶22.

The court in *Ceesay* stated “[t]he government does not have carte blanche to enforce the law, even the immigration law, in any manner that it chooses, provided that at the end of the day it can say that those it calls criminals have been jailed and that those it deems deportable have been deported. In America, the government—including the courts—are constrained by the Constitution, not free to follow the Machiavellian maxim. ICE has the power to execute removals, yes, but not in ‘any manner [that it] please[s]’ so long as the ends justify the means.” *Ceesay*, 781 F. Supp. 3d at 168; *see also Zadvydas v. Davis*, 533 U.S. 678, 679, 121 S. Ct. 2491, 2493, 150 L. Ed. 2d 653 (2001) (“[f]reedom from imprisonment lies at the heart of the liberty protected by the Due Process Clause.)

Under *Zadvydas*, once the initial 90-day removal period has passed, continued detention is lawful only if the government can show a “significant likelihood of removal in the reasonably foreseeable future.” *Zadvydas*, 533 U.S. 678; *see also Escalante v.*

Noem, 2025 WL 2206113 (E.D. Tex. Aug. 2, 2025) (finding when a non-citizen released pursuant to an OSUP is re-detained for the purposes of removal, the government immediately bears the burden to show a substantial likelihood of removal in the now foreseeable future); *Roble v. Bondi*, No. 25-CV-3196 (LMP/LIB), 2025 WL 2443453, at *4 (D. Minn. Aug. 25, 2025) (applying the “default rule” that the burden falls on the party who generally seeks to change the present state of affairs and that is ICE that seeks to change the present state of affairs by revocation of an OSUP); *Tadros v. Noem*, 2025 WL 1678501 (D.N.J. June 13, 2025) (finding individual had “the better argument” that the burden shifts to the government upon re-detention, although individual also presented un rebutted evidence that removal was not likely in the foreseeable future); *Nguyen v. Hyde*, No. 25-cv-11470, 2025 WL 1725791 (D. Mass. June 20, 2025) (finding Zadvydas 6-month presumption not applicable where alien is re-detained after having been on supervised release).

Respondents must show real, concrete steps toward removal—not mere speculation, general assertions, or boilerplate claims. Respondents only step towards removal is the declaration from Deportation Officer Peng asserting a request for a travel document was made on November 10, 2025. *See* ECF No. 12-1, PageID 67, ¶22. Petitioner has been on an order of supervision for fourteen years. Respondents have not made a showing of what circumstance has changed that has now made it possible for Respondents to obtain a travel document for Petitioner to return to Mauritania.

Respondents argue Petitioner cannot demonstrate prejudice because even if ICE complied with § 241.4(1)(1) notice and informal interview requirement, nothing changes. *See* ECF No. 12, PageID 63. Petitioner respectfully disagrees. The purpose of the

informal interview is to collect or confirm information relevant to the custody determination—including criminal history, immigration history, removal efforts, family ties, and any factors bearing on danger to the community or flight risk. *Guidance Relating to 8 C.F.R. § 241.4, Continued Detention of Aliens Beyond the Removal Period and New Procedures Relating to Case Transfers to the CDU*, U.S. Immigration and Customs Enforcement (Nov. 14, 2007). The informal interview provides the detained individual the opportunity to offer mitigating information, correct errors, and present evidence that they are not a danger to the community and not a flight risk under § 241.4. *ICE, Guidance Relating to 8 C.F.R. § 241.4* (2007).

ICE's compliance with regulations and their own procedures was the difference in Petitioner being released or remaining detained. Petitioner has no criminal record in the over 20-year time span that he has been in the United States, has never been deemed a flight risk and had attended all of his ICE check-ins within the almost 14 year span he was under an order of supervision. It is irresponsible for Respondents to argue that nothing would have changed had Petitioner been provided his right to due process by ICE following the regulations put in place without any showing or evidence, making an exception for ICE to not follow the Constitution, law or their own regulations and procedures. "Procedure is not mere puffery, a gesture that is irrelevant so long as the result is correct. The Constitution safeguards not just substantive rights under the law but *due process* as well. That process is at the core of what our Constitution guarantees." *Ceesay*, 781 F. Supp. 3d at 157.

CONCLUSION

Based on the foregoing, Issa respectfully reiterates his request that the Court grant his Petition for Writ of Habeas Corpus and order his immediate release from detention.

Respectfully submitted,

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