

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

Betsa v. City of Avon Lake, Ohio, et al.

Betsa · No. 1:25-cv-2478 · Decided January 7, 2026

SUMMARY

This Report and Recommendation addresses pro se Plaintiff Jeremy Betsa’s motion for a temporary restraining order against the City of Avon Lake and related defendants. The magistrate judge recommends denying the motion, concluding that Younger abstention applies to Betsa’s due process claim and that he failed to establish the remaining requirements for injunctive relief. The recommendation was issued in connection with parallel state and federal litigation concerning Betsa’s suspension and termination from employment as Avon Lake’s fire chief.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	James E. Grimes Jr.
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	January 7, 2026
DOCKET	1:25-cv-2478
DISPOSITION	other
PROCEDURAL POSTURE	Report and recommendation on Plaintiff's motion for a temporary restraining order under Federal Rule of Civil Procedure 65.
STANDARD OF REVIEW	A party seeking a temporary restraining order under Federal Rule of Civil Procedure 65 bears the burden of establishing a strong or substantial likelihood of success on the merits, irreparable harm absent relief, substantial harm to others, and that injunctive relief serves the public interest. The factors are balanced rather than treated as prerequisites.
PRECEDENTIAL VALUE	Nonprecedential report and recommendation; not a final district-court disposition in the source text.
PARTIES	Jeremy Betsa v. City of Avon Lake, Ohio, et al.

TOPICS

injunctions

civil procedure

due process

first amendment

ada / disability

PRACTICE AREAS

civil procedure

constitutional law

civil rights

employment law

municipal law

remedies

QUESTIONS PRESENTED

1. Whether Betsa established a likelihood of success on his procedural due process claim sufficient to warrant a temporary restraining order.
2. Whether Younger abstention required the federal court to refrain from deciding Betsa's intertwined due process claim while related state proceedings were pending.
3. Whether Betsa established a likelihood of success on his First Amendment retaliation, ADA, and Rehabilitation Act claims.
4. Whether Betsa established irreparable harm, substantial harm to others, and a public interest supporting temporary injunctive relief.

HOLDINGS

1. The court recommended abstaining under Younger from deciding Betsa's procedural due process claim because related state judicial proceedings were ongoing, those proceedings implicated the important state interest in regulating municipal employee discipline, and the state proceedings provided an adequate opportunity to raise constitutional challenges.
2. The court recommended denying the temporary restraining order because Betsa failed to establish the required likelihood of success on the merits, irreparable harm, and a balance of the remaining factors favoring relief.

KEY QUOTATIONS

"These factors are not prerequisites but are factors that are to be balanced against each other." (Legal Standard)

"The loss of a job is quintessentially reparable by money damages." (Irreparable harm)

"For the reasons explained above, I recommend that the Court deny Betsa's TRO Motion, Doc. 23." (Conclusion)

FACTUAL BACKGROUND

Jeremy Betsa was Avon Lake's fire chief and alleged that the City disciplined and suspended him in July and August 2025 in violation of due process, the First Amendment, the ADA, the Rehabilitation Act, Ohio law, and other legal protections. He filed a federal action on November 14, 2025, and later sought a temporary restraining order after receiving additional disciplinary documents. While the federal action was pending, Betsa also had a related state-court action involving the same employment discipline and sought similar injunctive relief there; the City terminated him effective December 31, 2025.

PROCEDURAL HISTORY

Betsa filed a federal nine-count complaint against the City of Avon Lake, its employees and representatives, a firefighters' union, and union officers. He later moved for a temporary restraining order based on alleged disciplinary actions and termination. The motion was referred to the magistrate judge for a report and recommendation, and after briefing and a videoconference hearing, the magistrate judge recommended that the district court deny the motion.

DISPOSITION

other

CASES CITED

- Northeast Ohio Coalition for Homeless and Service Employees Int'l Union, 467 F.3d 999, 1009 (6th Cir. 2006)
- Jones v. Caruso, 569 F.3d 258, 265 (6th Cir. 2009)
- Overstreet v. Lexington-Fayette Urban County Gov't, 305 F.3d 566, 573, 579 (6th Cir. 2002)
- Porter v. Lee, 328 U.S. 246, 251 (1946)
- Detroit Int'l Bridge Co. v. Fed. Highway Admin., 666 F. Supp. 2d 740, 744 (E.D. Mich. 2009)
- Balow v. Michigan State Univ., Balow v. Michigan State Univ., 24 F.4th 1051, 1062 n.8 (6th Cir. 2022)
- Younger v. Harris, 401 U.S. 37 (1971)
- O'Neill v. Coughlan, 511 F.3d 638, 641, 643 (6th Cir. 2008)
- Ohio Civil Rights Comm'n v. Dayton Christian Sch., Inc., 477 U.S. 619, 626 (1986)
- Sun Refining & Mktg. Co. v. Brennan, 921 F.2d 635, 639 (6th Cir. 1990)
- Simone v. Cleveland, No. 1:23-cv-1114, 2023 WL 8480083, at *3 (N.D. Ohio Dec. 7, 2023)
- Walsh v. Erie Cnty. Dep't of Job & Fam. Servs., 240 F. Supp. 2d 731, 757 (N.D. Ohio 2003)
- United States v. Neal, 611 F.3d 399, 402 (7th Cir. 2010)
- Jean v. Nelson, 472 U.S. 846, 854 (1985)
- New York City Transit Auth. v. Beazer, 440 U.S. 568, 582 (1979)
- Crook v. Baker, 813 F.2d 88, 91 (6th Cir. 1987)
- Basicomputer Corp. v. Scott, 973 F.2d 507, 511 (6th Cir. 1992)
- Gunderson v. Burnaugh, No. 2:25-cv-301, 2025 WL 1424634, at *3 (S.D. Ohio May 15, 2025)
- Berkshire v. Beauvais, 928 F.3d 520, 530–31 (6th Cir. 2019)