

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Stefanski v. Healy

Stefanski · No. 4:25-cv-1680 · Decided November 25, 2025

SUMMARY

The United States District Court for the Northern District of Ohio denied and dismissed Kenneth Edward Stefanski Jr.'s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that a state-law detainer did not satisfy the federal habeas custody requirement and that its effects on prison classification and program eligibility did not establish a due process violation. The court also denied a certificate of appealability and determined that an evidentiary hearing was unwarranted.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	J. Philip Calabrese
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	November 25, 2025
DOCKET	4:25-cv-1680
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought relief under 28 U.S.C. § 2241 challenging a state detainer lodged against him while he was incarcerated in federal custody. The district court denied and dismissed the habeas petition and denied a certificate of appealability.
STANDARD OF REVIEW	The court applied the statutory requirements for § 2241 habeas jurisdiction and evaluated whether the petition alleged custody under the conviction or sentence being challenged, a violation of federal law or the Constitution, and a basis for a certificate of appealability.
PRECEDENTIAL VALUE	unpublished
PARTIES	Kenneth Edward Stefanski Jr. v. Ian Healy, Warden

TOPICS

- federal habeas corpus
- post-conviction relief
- due process

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Constitutional law

QUESTIONS PRESENTED

1. Whether a federal court may grant § 2241 habeas relief based solely on a state detainer that was not issued in connection with a federal offense.
2. Whether the detainer's alleged effects on prison classification, programming, and eligibility for time credits established a due process violation.
3. Whether Stefanski was entitled to a certificate of appealability.

HOLDINGS

1. A state detainer not issued in connection with a federal offense did not satisfy the federal habeas custody requirement and could not support relief under § 2241.
2. The mere lodging of a detainer, including adverse effects on prisoner classification and eligibility for programs, did not by itself violate due process.
3. A certificate of appealability was denied because no reasonable jurist could find the dismissal of the petition incorrect or fairly debatable.

KEY QUOTATIONS

“The detainer at issue does not satisfy this “in custody” requirement because it was not issued in connection with a federal offense.”

“Without more, the mere lodging of a detainer does not violate a prisoner’s due process rights.”

“Therefore the Court DENIES and DISMISSES his habeas petition.”

FACTUAL BACKGROUND

Kenneth Edward Stefanski Jr. was incarcerated at FCI Elkton in Lisbon, Ohio, serving a sentence imposed by the Eastern District of Michigan. A Wayne County, Michigan prosecutor allegedly issued a detainer against him, which Stefanski claimed was invalid and had expired in 2022. He alleged that the detainer adversely affected his programming and eligibility for time credits, and he had unsuccessfully pursued relief in Michigan state court.

PROCEDURAL HISTORY

Stefanski, an inmate at FCI Elkton, filed a § 2241 petition challenging a Wayne County, Michigan detainer that allegedly interfered with programming and eligibility for time credits and had expired. He had previously sought relief in Michigan state court without success. The Northern District of Ohio dismissed the federal habeas petition and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- *Maleng v. Cook*, 490 U.S. 488, 490-91 (1989)
- *Carafas v. LaVallee*, 391 U.S. 234, 238 (1968)
- *Brundage v. Snyder*, 27 F. App'x 572, 572 (6th Cir. 2001)
- *Norris v. Schotten*, 146 F.3d 314, 328 (6th Cir. 1998)
- *Moody v. Daggett*, 429 U.S. 78, 86, 88 n.9 (1976)
- *Tennard v. Dretke*, 542 U.S. 274, 282 (2004)
- *Miller-El v. Cockrell*, 537 U.S. 322, 337 (2003)

OPINION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION KENNETH EDWARD STEFANSKI) Case No. 4:25-cv-1680 JR.,)) Judge J. Philip Calabrese Petitioner,)) Magistrate Judge v.) Jonathan D. Greenberg) IAN HEALY, Warden,)) Respondent.)) OPINION AND ORDER Petitioner Kenneth Edward Stefanski Jr., an inmate at FCI Elkton in Lisbon, Ohio, is serving a sentence pursuant to a judgment of the Eastern District of Michigan.

He brings this habeas petition under 28 U.S.C. § 2241 to challenge a detainer, which interferes with certain programming and eligibility for time credits. He contends that the prosecutor in Wayne County, Michigan issued the detainer, which is invalid and allegedly expired in 2022 in any event.

Under Section 2241, a “writ of habeas corpus shall not extend to a prison” except in certain circumstances. 28 U.S.C. § 2241(c). Under the statute, a prisoner must be in custody under the authority of the United States or in violation of the Constitution or federal law, among other things. See *id.* § 2241(c)(1)–(5). This provision means that, to obtain federal habeas relief, the prisoner must be “in custody” under the conviction or sentence under attack at the time the petition is filed.

See *Maleng v. Cook*, 490 U.S. 488, 490–91 (1989) (per curiam) (quoting *Carafas v. LaVallee*, 391 U.S. 234, 238 (1968)). The detainer at issue does not satisfy this “in custody” requirement because it was not issued in connection with a federal offense. Put another way, a claim based solely on State law is not redressable through federal habeas corpus. *Brundage v. Snyder*, 27 F. App'x 572, 572 (6th Cir.

2001) (citing *Norris v. Schotten*, 146 F.3d 314, 328 (6th Cir.1998)). Without more, the mere lodging of a detainer does not violate a prisoner’s due process rights. *Moody v. Daggett*, 429 U.S.

78, 86 (1976). In addition, an adverse impact on a prisoner's classification and his eligibility for programs does not suffice to invoke due process. *Id.* at 88 n.9.

The Court understands that Mr. Stefanski must be frustrated that the detainer affects him. After all, he tried, unsuccessfully, to obtain relief in State court in Michigan. But federal habeas does not provide an avenue for the relief he seeks.

Therefore the Court DENIES and DISMISSES his habeas petition. CERTIFICATE OF APPEALABILITY Without a certificate of appealability, a habeas petitioner cannot appeal a final order in a habeas proceeding. 28 U.S.C. § 2253(c)(1). Issuance of a certificate of appealability requires a petitioner to make "a substantial showing of the denial of a constitutional right." 28 U.S.C. § 2253(c)(2).

This means that the petitioner must show that reasonable jurists would find the district court's determination of the relevant constitutional claims debatable or incorrect. *Tennard v. Dretke*, 542 U.S. 274, 282 (2004).

The petitioner need not show that the appeal would succeed to be eligible for a certificate of appealability. *Miller-El v. Cockrell*, 537 U.S. 322, 337 (2003). Because of clearly established decisions of the Sixth Circuit and the Supreme Court set forth above, the Court determines that no reasonable jurist could find the dismissal of this petition incorrect or fairly debatable.

Therefore, the Court DENIES a certificate of appealability. CONCLUSION For the foregoing reasons, the Court DENIES and DISMISSES Petitioner's habeas petition and determines that an evidentiary hearing is not warranted. Pursuant to 28 U.S.C. § 2253, the Court DENIES a certificate of appealability. SO ORDERED. Dated: November 25, 2025 J.PhilipCalabrese United States District Judge Northern District of Ohio