

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PRECEDENTIAL VALUE	unpublished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)

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