

Case No. _____

**Supreme Court
of the State of Ohio**

STATE OF OHIO *ex rel.* LISA DALY,

Relator,

v.

BOARD OF EDUCATION OF THE FOREST HILLS LOCAL SCHOOL DISTRICT,

and

ALANA CROPPER,

Treasurer, Forest Hills Local School District,

Respondents.

Original Action in Mandamus

VERIFIED COMPLAINT FOR WRIT OF MANDAMUS

Counsel for Relator Lisa Daly:

Curt C. Hartman (0064242)
THE LAW FIRM OF CURT C. HARTMAN
7394 Ridgepoint Drive, Suite 8
Cincinnati, Ohio 45230
(513) 379-2923
hartmanlawfirm@fuse.net

Christopher P. Finney (0038998)
FINNEY LAW FIRM
4270 Ivy Pointe Blvd., Suite 225
Cincinnati, Ohio 45245
(513) 943-6655
chris@finneylawfirm.com

*Counsel for Respondents Board of
Education of the Forest Hills Local
School District and Aana Cropper:*

William M. Deters II (0065203)
ENNIS BRITTON L.P.A.
1714 W. Galbraith Rd.
Cincinnati, Ohio 45239
(513) 421-2540

responding to “acts of terrorism,” *see* R.C. 149.433, the BOARD OF EDUCATION and Treasurer CROPPER have improperly expanded such exemption by claiming such exemption in order to refuse to release information in records relating to the School District’s response relative to federal law enforcement officers being present on school property in order to enforce federal law.

3. Stated otherwise, in invoking the exemption under R.C. 149.433, the BOARD OF EDUCATION and Treasurer CROPPER have equated federal law enforcement officers simply seeking to enforce federal law as being akin to an “act of terrorism” or an “attack, interference, or sabotage” so as to deny, in part, a request for public records that simply sought “any plan, memorandum, or outline from January 20, 2025, to the present, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE).”

4. As federal law enforcement officers enforcing federal law are not equivalent to being “terrorists” or engaging in an “attack, interference, or sabotage” against the School District, the refusal of the BOARD OF EDUCATION and Treasurer CROPPER to provide unredacted copies of records addressing the response to such federal law enforcement officers on school property lacks any basis in law. Thus, a claim for mandamus and other relief under the Public Records Act is in order.

* * * * *

5. Relator LISA DALY is a resident and taxpayer of the State of Ohio, as well as a resident and taxpayer in the Forest Hills Local School District, located in Hamilton County.

6. Respondent BOARD OF EDUCATION OF THE FOREST HILLS LOCAL SCHOOL DISTRICT is the governing body for the Forest Hills Local School District and,

pursuant to Section 3313.17 of the Ohio Revised Code, is a body politic and corporate capable of suing and being sued. The BOARD OF EDUCATION is the public office whose public records are at issue herein.

7. Respondent ALANA CROPPER is the Treasurer of the Forest Hills Local School District and, in that capacity, is a person responsible for the public records of the BOARD OF EDUCATION OF THE FOREST HILLS LOCAL SCHOOL DISTRICT and the Forest Hills Local School District, including, without limitation, the public records at issue herein.

* * * * *

8. After four years whereby millions of illegal aliens crossed the United States borders or were permitted to fly directly into the United States on commercial flights and allowed to settle in American communities, all in violation of longstanding federal laws, President Trump and his Administration, since taking office on January 20, 2025, have undertaken numerous executive actions and initiatives related to the enforcement of federal immigration laws.

9. On January 20, 2025, President Trump issued *Executive Order No. 14159*, entitled “Protecting the American People Against Invasion”.

10. A true and accurate copy of *Executive Order No. 14159* is attached hereto as *Exhibit A*.

11. Within *Executive Order No. 14159*, President Trump declared and pronounced that “[i]t is the policy of the United States to faithfully execute the immigration laws against all inadmissible and removable aliens, particularly those aliens who threaten the safety or security of the American people.”

12. Within *Executive Order No. 14159*, President Trump declared and directed “[t]he Secretary of Homeland Security [to] take all appropriate action to enable the Director of U.S.

Immigration and Customs Enforcement, the Commissioner of U.S. Customs and Border Protection, and the Director of U.S. Citizenship and Immigration Services to set priorities for their agencies that protect the public safety and national security interests of the American people, including by ensuring the successful enforcement of final orders of removal. Further, the Secretary of Homeland Security shall ensure that the primary mission of U.S. Immigration and Customs Enforcement's Homeland Security Investigations division is the enforcement of the provisions of the INA and other Federal laws related to the illegal entry and unlawful presence of aliens in the United States and the enforcement of the purposes of this order.”

13. Within *Executive Order No. 14159*, President Trump also declared and directed “[t]he Attorney General, in coordination with the Secretary of State and the Secretary of Homeland Security, [to] take all appropriate action to prioritize the prosecution of criminal offenses related to the unauthorized entry or continued unauthorized presence of aliens in the United States.”

14. Thus, consistent with and in furtherance of *Executive Order No. 14159*, components of the Department of Homeland Security, including the U.S. Immigration and Customs Enforcement (“ICE”), have undertaken actions across the country to faithfully enforce and execute the immigration laws, including deporting individuals who entered the country illegally, including deporting illegal aliens who, while in this country, committed criminal acts of violence against citizens of this country.

15. In response to the efforts by federal law enforcement officials to enforce the federal immigration laws, a narrow and extreme element of society and anarchists have sought to disrupt and interfere with such law enforcement efforts.

16. Efforts opposing federal law enforcement officials enforcing the federal immigration laws have also resulted in some students in public schools staging walkouts in the middle of the school day, *i.e.*, engaging in truancy, with either the silent ratification of such efforts by school officials or outright condonation and appellation of such efforts by school officials.

17. Such a walkout occurred in the Forest Hills Local School District on January 23, 2026, when a small group of students at Turpin High School walked out in the middle of the school day purportedly to protest the enforcement of federal law by ICE officials, with reports indicating various levels of coordination with school officials for such efforts.

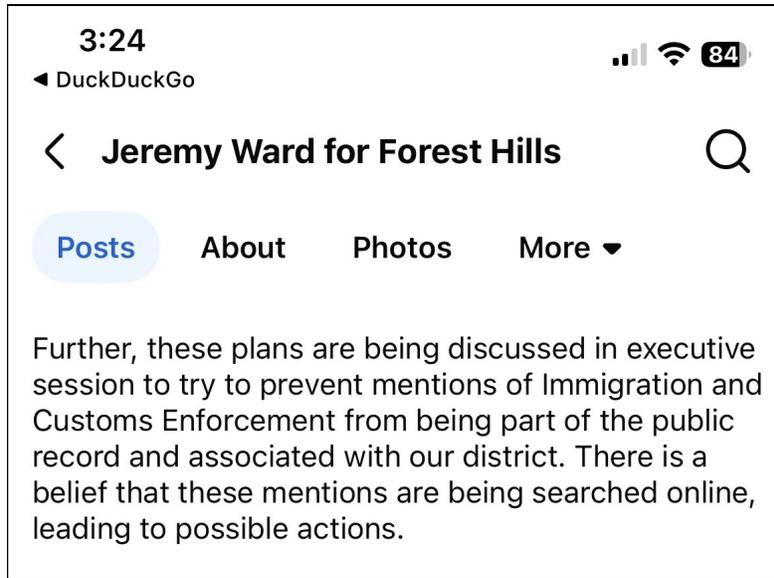
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18. In early February 2026, it became known in and about the community of the Forest Hills Local School District that the BOARD OF EDUCATION and School District administrators had already developed and approved a written plan or policy on how the School District and its personnel should respond should federal law enforcement officers (such as ICE) appear on school property in an effort to enforce federal immigration law.

19. Based on information and belief, the BOARD OF EDUCATION actually met in an executive session during a meeting on February 3, 2026, wherein they discussed, helped develop, and ultimately approved such a plan or policy which was ultimately entitled *ICE Response Plan — FHSD*.

20. Subsequently, one member of the BOARD OF EDUCATION, Jeremy Ward, in a Facebook post on February 14, 2026, explained the development and adoption of the *ICE Response Plan — FHSD* in the executive session as being undertaken in order to avoid calling

the School District to the attention of federal law enforcement officials (including ICE) in order to avoid possible enforcement of the law by such officials:



21. Based upon information and belief, at no time has the Forest Hills Local School District had any knowledge or indication of any effort or plans by federal law enforcement officials (including ICE) to be present on school property of the School District in order to enforce federal immigration law.

* * * * *

22. On February 14, 2026, undersigned counsel, on behalf of LISA DALY, tendered a *Public Records Request* to the Forest Hills Local School District seeking:

any plan, memorandum, or outline from January 20, 2025, to the present, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE).

23. On February 17, 2026, Josh Bazan (the Director of Communications for the Forest Hills School District) provided a *Response to Public Records Request* wherein he provided a single document entitled *ICE Response Plan — FHSD*.

24. A copy of the email exchange containing the *Public Records Request* and the *Response to Public Records Request* is attached hereto as *Exhibit B*.

25. A copy of the *ICE Response Plan — FHSD* as provided with the *Response to Public Records Request* on February 17, 2026, is attached hereto as *Exhibit C*.

26. As indicated in the *Response to Public Records Request* and the *ICE Response Plan — FHSD*, the BOARD OF EDUCATION (through its Director of Communications, Josh Bazan) denied, in part, the *Public Records Request* when it redacted information therein under the purported authority of R.C. 149.433.

* * * * *

27. “The Public Records Act allows public access to public records with certain exceptions and is based on the ‘fundamental policy of promoting open government, not restricting it.’” *Gilbert v. Summit Cty.*, 104 Ohio St. 3d 660, 821 N.E.2d 56, 2004-Ohio-7108 ¶7 (quoting *State ex rel. The Miami Student v. Miami Univ.*, 79 Ohio St. 3d 168, 171, 680 N.E.2d 956, 1997-Ohio-386).

28. Pursuant to R.C. 149.43(B)(1), “a public office or person responsible for public records” has the legal duty or obligation to make copies of requested public records available to the requester within a reasonable period of time.

29. “Consistent with this policy, exceptions to disclosure must be strictly construed against the public records custodian, and the custodian bears the burden to establish the applicability of an exception.” *State ex rel. Besser v. Ohio State Univ.*, 89 Ohio St. 3d 396, 398, 732 N.E.2d 373, 2000-Ohio-207.

30. A “public record” is defined as meaning “records kept by any public office...” R.C. 149.43(A)(1).

31. Additionally, a “public office” is defined as including “state agency, public institution, political subdivision, or other organized body, office, agency, institution, or entity established by the laws of this state for the exercise of any function of government.” R.C. 149.011(A)

32. A “record” is defined as including “any document, device, or item...created or received by or coming under the jurisdiction of any public office of the state or its political subdivisions, which serves to document the organization, functions, policies, decisions, procedures, operations, or other activities of the office.” R.C. 149.011(G).

33. The public records sought by the *Public Records Request*, i.e., records documenting any plan, memorandum, or outline since January 20, 2025, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE), constitute “public records” of the BOARD OF EDUCATION and of the Forest Hills Local School District.

34. The BOARD OF EDUCATION is a “public office” which has the legal duty or obligation to make copies of the public records sought pursuant to the *Public Records Request*.

35. ALANA CROPPER is a “person responsible” for the public records sought pursuant to the *Public Records Request* and, thus, has the legal duty or obligation to make copies of the public records sought pursuant to the *Public Records Request*.

36. Courts “construe the Public Records Act liberally in favor of broad access and resolve any doubt in favor of disclosure of public records.” *State ex rel. Rucker v. Guernsey Cty. Sheriff’s Office*, 126 Ohio St. 3d 224, 932 N.E.2d 327, 2010-Ohio-3288 ¶6.

37. Thus, “[e]xceptions to disclosure under the Public Records Act, R.C. 149.43, are strictly construed against the public-records custodian, and the custodian has the burden to

establish the applicability of an exception.” *State ex rel. Cincinnati Enquirer v. Jones-Kelly*, 118 Ohio St.3d 81, 886 N.E.2d 206, 2008-Ohio-1770 (syllabus ¶2).

38. R.C. 149.433 exempts from disclosure under the Public Records Act information constituting a “security record” which, in turn, means: (i) a record containing “information directly used for protecting or maintaining the security of a public office against attack, interference, or sabotage”; (ii) any “record assembled, prepared, or maintained by a public office or public body to prevent, mitigate, or respond to acts of terrorism”; or (iii) an emergency management plan adopted pursuant to R.C. 5502.262.

39. Information in a record addressing responses to federal law enforcement officials enforcing federal immigration law does not fall within the ambit of being a “security record” as the actions of federal law enforcement officers enforcing the law does not constitute or equate to an “act of terrorism” or an “attack, interference, or sabotage” of a public office.

40. Thus, records documenting any plan, memorandum, or outline since January 20, 2025, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE), including the *ICE Response Plan — FHSD*, are not security records as they do not constitute or equate to an “act of terrorism” or an “attack, interference, or sabotage” of a public office.

41. Thus, the BOARD OF EDUCATION and Treasurer CROPPER have violated their legal duties in refusing to produce the public records sought by the *Public Records Request*, i.e., records documenting any plan, memorandum, or outline since January 20, 2025, addressing how the Forest Hills School District or its staff should respond to the presence on school property of

any officers or officials with Immigration and Customs Enforcement (ICE), and to produce such records without redactions.

42. The BOARD OF EDUCATION *qua* a public office and Treasurer CROPPER *qua* a person responsible have the clear legal duty pursuant to the Public Records Act to produce the public records sought by the *Public Records Request*, *i.e.*, records documenting any plan, memorandum, or outline since January 20, 2025, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE), and to produce such records without redactions.

43. LISA DALY has a clear legal right to copies of the public records sought by the *Public Records Request*, *i.e.*, records documenting any plan, memorandum, or outline since January 20, 2025, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE), and such records to be produced without redactions.

44. LISA DALY has no adequate remedy in the ordinary course of law to obtain copies of the public records sought by the *Public Records Request*, *i.e.*, records documenting any plan, memorandum, or outline since January 20, 2025, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE), and to obtain such copies without redactions.

45. There is no legally valid excuse for the failure of the BOARD OF EDUCATION and Treasurer CROPPER to provide the public records sought by the *Public Records Request*, *i.e.*, records documenting any plan, memorandum, or outline since January 20, 2025, addressing how the Forest Hills School District or its staff should respond to the presence on school

property of any officers or officials with Immigration and Customs Enforcement (ICE), and to provide such records without redactions.

46. The issuance of a writ of mandamus will serve the public interest and provide a public benefit by encouraging and promoting compliance in the future by public offices and public officials with the terms of the Public Records Act, as well as court decisions thereon. *See State ex rel. Rasul-Bey v. Onunwor*, 94 Ohio St.3d 119,122, 760 N.E.2d 421, 2002-Ohio-67; *State ex rel. Kim v. Wachenschwanz*, 93 Ohio St.3d 586, 589, 757 N.E.2d 367, 2001-Ohio-1616.

47. The issuance of a writ of mandamus will serve the public interest and provide a public benefit by exposing to public scrutiny detailed information concerning the efforts of a local governmental body, *i.e.*, the BOARD OF EDUCATION, to frustrate or interfere with the rule of law by how they respond or intend to respond to law enforcement officers simply seeking to enforce the law.

48. The issuance of a writ of mandamus will serve the public interest and provide a public benefit by ensuring that the BOARD OF EDUCATION and its officials and employees operate openly so that such operations will be subject to public scrutiny.

WHEREFORE, the STATE OF OHIO, by and through Relator LISA DALY, and, in support of its claim, hereby applies and requests this Court to order the issuance of a peremptory writ of mandamus or, alternatively, an alternative writ of mandamus, compelling the Respondents to comply with their legal duties under the Public Records Act, including, without limitation, to produce copies of all public records sought by and responsive to the *Public Records Request*, *i.e.*, records documenting any plan, memorandum, or outline since January 20, 2025, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE),

including producing such records without redactions, together with an award of statutory damages, attorney fees, and costs.

Respectfully submitted,

/s/ Curt C. Hartman
Curt C. Hartman
THE LAW FIRM OF CURT C. HARTMAN
7394 Ridgepoint Drive, Suite 8
Cincinnati, Ohio 45230
(513) 379-2923
hartmanlawfirm@fuse.net

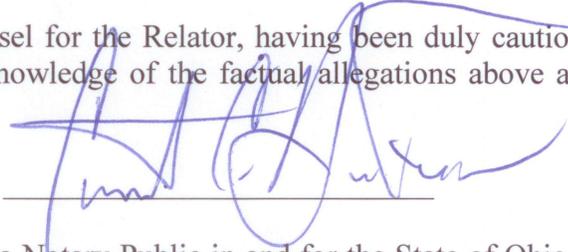
Christopher P. Finney (0038998)
FINNEY LAW FIRM
4270 Ivy Pointe Blvd., Suite 225
Cincinnati, Ohio 45245
(513) 943-6655
chris@finneylawfirm.com

Attorneys for Relator Lisa Daly

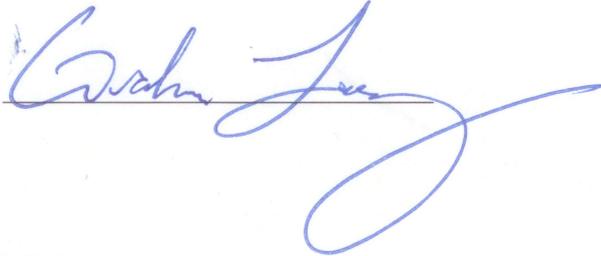
VERIFICATION

State of Ohio, County of Clermont) ss:

Comes now, Curt C. Hartman, counsel for the Relator, having been duly cautioned and sworn, and declares that he has personal knowledge of the factual allegations above and such allegations are true and accurate.



Sworn to and subscribed before me, a Notary Public in and for the State of Ohio, on this the 25th day of February 2026.



GRAHAM LANG
Notary Public, State of Ohio
My Commission Expires
May 08, 2028
COMMISSION: 2023-RE-863547

Presidential Documents

Executive Order 14159 of January 20, 2025

Protecting the American People Against Invasion

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the Immigration and Nationality Act (INA) (8 U.S.C. 1101 *et seq.*) and section 301 of title 3, United States Code, it is hereby ordered:

Section 1. Purpose. Over the last 4 years, the prior administration invited, administered, and oversaw an unprecedented flood of illegal immigration into the United States. Millions of illegal aliens crossed our borders or were permitted to fly directly into the United States on commercial flights and allowed to settle in American communities, in violation of longstanding Federal laws.

Many of these aliens unlawfully within the United States present significant threats to national security and public safety, committing vile and heinous acts against innocent Americans. Others are engaged in hostile activities, including espionage, economic espionage, and preparations for terror-related activities. Many have abused the generosity of the American people, and their presence in the United States has cost taxpayers billions of dollars at the Federal, State, and local levels.

Enforcing our Nation's immigration laws is critically important to the national security and public safety of the United States. The American people deserve a Federal Government that puts their interests first and a Government that understands its sacred obligation to prioritize the safety, security, and financial and economic well-being of Americans.

This order ensures that the Federal Government protects the American people by faithfully executing the immigration laws of the United States.

Sec. 2. Policy. It is the policy of the United States to faithfully execute the immigration laws against all inadmissible and removable aliens, particularly those aliens who threaten the safety or security of the American people. Further, it is the policy of the United States to achieve the total and efficient enforcement of those laws, including through lawful incentives and detention capabilities.

Sec. 3. Faithful Execution of the Immigration Laws. In furtherance of the policies described in section 2 of this order:

(a) Executive Order 13993 of January 20, 2021 (Revision of Civil Immigration Enforcement Policies and Priorities), Executive Order 14010 of February 2, 2021 (Creating a Comprehensive Regional Framework To Address the Causes of Migration, To Manage Migration Throughout North and Central America, and To Provide Safe and Orderly Processing of Asylum Seekers at the United States Border), Executive Order 14011 of February 2, 2021 (Establishment of Interagency Task Force on the Reunification of Families), and Executive Order 14012 of February 2, 2021 (Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans) are hereby revoked; and

(b) Executive departments and agencies (agencies) shall take all appropriate action to promptly revoke all memoranda, guidance, or other policies based on the Executive Orders revoked in section 3(a) of this order and shall employ all lawful means to ensure the faithful execution of the immigration laws of the United States against all inadmissible and removable aliens.

Exhibit A

Sec. 4. *Civil Enforcement Priorities.* The Secretary of Homeland Security shall take all appropriate action to enable the Director of U.S. Immigration and Customs Enforcement, the Commissioner of U.S. Customs and Border Protection, and the Director of U.S. Citizenship and Immigration Services to set priorities for their agencies that protect the public safety and national security interests of the American people, including by ensuring the successful enforcement of final orders of removal. Further, the Secretary of Homeland Security shall ensure that the primary mission of U.S. Immigration and Customs Enforcement's Homeland Security Investigations division is the enforcement of the provisions of the INA and other Federal laws related to the illegal entry and unlawful presence of aliens in the United States and the enforcement of the purposes of this order.

Sec. 5. *Criminal Enforcement Priorities.* The Attorney General, in coordination with the Secretary of State and the Secretary of Homeland Security, shall take all appropriate action to prioritize the prosecution of criminal offenses related to the unauthorized entry or continued unauthorized presence of aliens in the United States.

Sec. 6. *Federal Homeland Security Task Forces.* (a) The Attorney General and the Secretary of Homeland Security shall take all appropriate action to jointly establish Homeland Security Task Forces (HSTFs) in all States nationwide.

(b) The composition of each HSTF shall be subject to the direction of the Attorney General and the Secretary of Homeland Security, but shall include representation from any other Federal agencies with law enforcement officers, or agencies with the ability to provide logistics, intelligence, and operational support to the HSTFs, and shall also include representation from relevant State and local law enforcement agencies. The heads of all Federal agencies shall take all appropriate action to provide support to the Attorney General and the Secretary of Homeland Security to ensure that the HSTFs fulfill the objectives in subsection (c) of this section, and any other lawful purpose that fulfills the policy objectives of this order.

(c) The objective of each HSTF is to end the presence of criminal cartels, foreign gangs, and transnational criminal organizations throughout the United States, dismantle cross-border human smuggling and trafficking networks, end the scourge of human smuggling and trafficking, with a particular focus on such offenses involving children, and ensure the use of all available law enforcement tools to faithfully execute the immigration laws of the United States.

(d) The Attorney General and the Secretary of Homeland Security shall take all appropriate action to provide an operational command center to coordinate the activities of the HSTFs and provide such support as they may require, and shall also take all appropriate action to provide supervisory direction to their activities as may be required.

Sec. 7. *Identification of Unregistered Illegal Aliens.* The Secretary of Homeland Security, in coordination with the Secretary of State and the Attorney General, shall take all appropriate action to:

(a) Immediately announce and publicize information about the legal obligation of all previously unregistered aliens in the United States to comply with the requirements of part VII of subchapter II of chapter 12 of title 8, United States Code;

(b) Ensure that all previously unregistered aliens in the United States comply with the requirements of part VII of subchapter II of chapter 12 of title 8, United States Code; and

(c) Ensure that failure to comply with the legal obligations of part VII of subchapter II of chapter 12 of title 8, United States Code, is treated as a civil and criminal enforcement priority.

Sec. 8. *Civil Fines and Penalties.* (a) The Secretary of Homeland Security, in coordination with the Secretary of Treasury, shall take all appropriate action to ensure the assessment and collection of all fines and penalties

that the Secretary of Homeland Security is authorized by law to assess and collect from aliens unlawfully present in the United States, including aliens who unlawfully entered or unlawfully attempted to enter the United States, and from those who facilitate such aliens' presence in the United States.

(b) Within 90 days of the date of this order, the Secretary of the Treasury and the Secretary of Homeland Security shall submit a report to the President regarding their progress implementing the requirements of this section and recommending any additional actions that may need to be taken to achieve its objectives.

Sec. 9. *Efficient Removals of Recent Entrants and Other Aliens.* The Secretary of Homeland Security shall take all appropriate action, pursuant to section 235(b)(1)(A)(iii)(I) of the INA (8 U.S.C. 1225(b)(1)(A)(iii)(I)), to apply, in her sole and unreviewable discretion, the provisions of section 235(b)(1)(A)(i) and (ii) of the INA to the aliens designated under section 235(b)(1)(A)(iii)(II). Further, the Secretary of Homeland Security shall promptly take appropriate action to use all other provisions of the immigration laws or any other Federal law, including, but not limited to sections 238 and 240(d) of the INA (8 U.S.C. 1228 and 1229a(d)), to ensure the efficient and expedited removal of aliens from the United States.

Sec. 10. *Detention Facilities.* The Secretary of Homeland Security shall promptly take all appropriate action and allocate all legally available resources or establish contracts to construct, operate, control, or use facilities to detain removable aliens. The Secretary of Homeland Security, further, shall take all appropriate actions to ensure the detention of aliens apprehended for violations of immigration law pending the outcome of their removal proceedings or their removal from the country, to the extent permitted by law.

Sec. 11. *Federal-State Agreements.* To ensure State and local law enforcement agencies across the United States can assist with the protection of the American people, the Secretary of Homeland Security shall, to the maximum extent permitted by law, and with the consent of State or local officials as appropriate, take appropriate action, through agreements under section 287(g) of the INA (8 U.S.C. 1357(g)) or otherwise, to authorize State and local law enforcement officials, as the Secretary of Homeland Security determines are qualified and appropriate, to perform the functions of immigration officers in relation to the investigation, apprehension, or detention of aliens in the United States under the direction and the supervision of the Secretary of Homeland Security. Such authorization shall be in addition to, rather than in place of, Federal performance of these duties. To the extent permitted by law, the Secretary of Homeland Security may structure each agreement under section 287(g) of the INA (8 U.S.C. 1357(g)) in the manner that provides the most effective model for enforcing Federal immigration laws in that jurisdiction.

Sec. 12. *Encouraging Voluntary Compliance with the Law.* The Secretary of Homeland Security shall take all appropriate action, in coordination with the Secretary of State and the Attorney General, and subject to adequate safeguards, assurances, bonds, and any other lawful measure, to adopt policies and procedures to encourage aliens unlawfully in the United States to voluntarily depart as soon as possible, including through enhanced usage of the provisions of section 240B of the INA (8 U.S.C. 1229c), international agreements or assistance, or any other measures that encourage aliens unlawfully in the United States to depart as promptly as possible, including through removals of aliens as provided by section 250 of the INA (8 U.S.C. 1260).

Sec. 13. *Recalcitrant Countries.* The Secretary of State and the Secretary of Homeland Security shall take all appropriate action to:

(a) Cooperate and effectively implement, as appropriate, the sanctions provided by section 243(d) of the INA (8 U.S.C. 1253(d)), with the Secretary of State, to the maximum extent permitted by law, ensuring that diplomatic

efforts and negotiations with foreign states include the foreign states' acceptance of their nationals who are subject to removal from the United States; and

(b) Eliminate all documentary barriers, dilatory tactics, or other restrictions that prevent the prompt repatriation of aliens to any foreign state. Any failure or delay by a foreign state to verify the identity of a national of that state shall be considered in carrying out subsection (a) this section, and shall also be considered regarding the issuance of any other sanctions that may be available to the United States.

Sec. 14. *Visa Bonds.* The Secretary of Treasury shall take all appropriate action, in coordination with the Secretary of State and the Secretary of Homeland Security, to establish a system to facilitate the administration of all bonds that the Secretary of State or the Secretary of Homeland Security may lawfully require to administer the provisions of the INA.

Sec. 15. *Reestablishment of the VOICE Office and Addressing Victims of Crimes Committed by Removable Aliens.* The Secretary of Homeland Security shall direct the Director of U.S. Immigration and Customs Enforcement (ICE) to take all appropriate and lawful action to reestablish within ICE an office to provide proactive, timely, adequate, and professional services to victims of crimes committed by removable aliens, and those victims' family members. The Attorney General shall also ensure that the provisions of 18 U.S.C. 3771 are followed in all Federal prosecutions involving crimes committed by removable aliens.

Sec. 16. *Addressing Actions by the Previous Administration.* The Secretary of State, the Attorney General, and the Secretary of Homeland Security shall promptly take all appropriate action, consistent with law, to rescind the policy decisions of the previous administration that led to the increased or continued presence of illegal aliens in the United States, and align any and all departmental activities with the policies set out by this order and the immigration laws. Such action should include, but is not limited to:

(a) ensuring that the parole authority under section 212(d)(5) of the INA (8 U.S.C. 1182(d)(5)) is exercised on only a case-by-case basis in accordance with the plain language of the statute, and in all circumstances only when an individual alien demonstrates urgent humanitarian reasons or a significant public benefit derived from their particular continued presence in the United States arising from such parole;

(b) ensuring that designations of Temporary Protected Status are consistent with the provisions of section 244 of the INA (8 U.S.C. 1254a), and that such designations are appropriately limited in scope and made for only so long as may be necessary to fulfill the textual requirements of that statute; and

(c) ensuring that employment authorization is provided in a manner consistent with section 274A of the INA (8 U.S.C. 1324a), and that employment authorization is not provided to any unauthorized alien in the United States.

Sec. 17. *Sanctuary Jurisdictions.* The Attorney General and the Secretary of Homeland Security shall, to the maximum extent possible under law, evaluate and undertake any lawful actions to ensure that so-called "sanctuary" jurisdictions, which seek to interfere with the lawful exercise of Federal law enforcement operations, do not receive access to Federal funds. Further, the Attorney General and the Secretary of Homeland Security shall evaluate and undertake any other lawful actions, criminal or civil, that they deem warranted based on any such jurisdiction's practices that interfere with the enforcement of Federal law.

Sec. 18. *Information Sharing.* (a) The Secretary of Homeland Security shall promptly issue guidance to ensure maximum compliance by Department of Homeland Security personnel with the provisions of 8 U.S.C. 1373 and 8 U.S.C. 1644 and ensure that State and local governments are provided with the information necessary to fulfill law enforcement, citizenship, or immigration status verification requirements authorized by law; and

(b) The Attorney General, the Secretary of Health and Human Services, and the Secretary of Homeland Security shall take all appropriate action to stop the trafficking and smuggling of alien children into the United States, including through the sharing of any information necessary to assist in the achievement of that objective.

Sec. 19. *Funding Review.* The Attorney General and the Secretary of Homeland Security shall:

(a) Immediately review and, if appropriate, audit all contracts, grants, or other agreements providing Federal funding to non-governmental organizations supporting or providing services, either directly or indirectly, to removable or illegal aliens, to ensure that such agreements conform to applicable law and are free of waste, fraud, and abuse, and that they do not promote or facilitate violations of our immigration laws;

(b) Pause distribution of all further funds pursuant to such agreements pending the results of the review in subsection (a) of this section;

(c) Terminate all such agreements determined to be in violation of law or to be sources of waste, fraud, or abuse and prohibit any such future agreements;

(d) Coordinate with the Director of the Office of Management and Budget to ensure that no funding for agreements described in subsection (c) of this section is included in any appropriations request for the Department of Justice or the Department of Homeland Security; and

(e) Initiate clawback or recoupment procedures, if appropriate, for any agreements described in subsection (c) of this section.

Sec. 20. *Denial of Public Benefits to Illegal Aliens.* The Director of the Office of Management and Budget shall take all appropriate action to ensure that all agencies identify and stop the provision of any public benefits to any illegal alien not authorized to receive them under the provisions of the INA or other relevant statutory provisions.

Sec. 21. *Hiring More Agents and Officers.* Subject to available appropriations, the Secretary of Homeland Security, through the Commissioner of U.S. Customs and Border Protection and the Director of U.S. Immigration and Customs Enforcement, shall take all appropriate action to significantly increase the number of agents and officers available to perform the duties of immigration officers.

Sec. 22. *Severability.* It is the policy of the United States to enforce this order to the maximum extent possible to advance the interests of the United States. Accordingly:

(a) If any provision of this order, or the application of any provision to any person or circumstance, is held to be invalid, the remainder of this order and the application of its other provisions to any other persons or circumstances shall not be affected thereby; and

(b) If any provision of this order, or the application of any provision to any person or circumstance, is held to be invalid because of the failure to follow certain procedures, the relevant executive branch officials shall implement those procedural requirements to conform with existing law and with any applicable court orders.

Sec. 23. *General Provisions.* (a) Nothing in this order shall be construed to impair or otherwise affect:

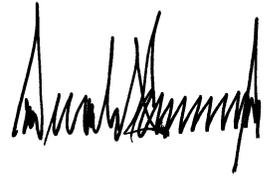
(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party

against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A handwritten signature in black ink, appearing to be "Donald Trump", located in the upper right quadrant of the page.

THE WHITE HOUSE,
January 20, 2025.

[FR Doc. 2025-02006
Filed 1-28-25; 11:15 am]
Billing code 3395-F4-P

From: Josh Bazan <joshbazan@foresthills.edu>
Sent: Tuesday, February 17, 2026 5:31 PM
To: hartmanlawfirm@fuse.net
Subject: Re: Public Records Request
Attachments: Request 2-14-26A ICE Response Plan_Redacted.pdf

Hello Curt,

Thank you for reaching out and submitting this request for public records. The district has received your request, and the reference ID for this request is 2-14-26A and this email serves as the district's response.

I have completed our search and am attaching a document that is relevant to your request. Please note that redactions have been made for information that is considered a security record and is exempt from disclosure pursuant to Ohio Revised Code 149.433.

This completes Request 2-14-26A. Please let me know if you have any questions.

Sincerely,
Josh

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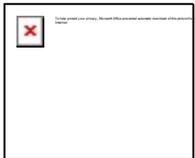
Josh Bazan

Director of Communications

[Forest Hills School District](#)

(513) 231-3600, ext. 2966

joshbazan@foresthills.edu



On Sat, Feb 14, 2026 at 12:32 PM <hartmanlawfirm@fuse.net> wrote:

Josh -

Pursuant to the Public Records Act and on behalf of a client, I request a copy of the following public records:

- any plan, memorandum, or outline from **January 20, 2025**, to the present, addressing how the Forest Hills School District or its staff should respond to the presence on school property of any officers or officials with Immigration and Customs Enforcement (ICE).

I request that any responsive records be provided in a pdf format and transmitted to me at this email address.

In light of the narrow and specific scope of this request, we look forward to the prompt production of the records.

Sincerely,
Curt Hartman

The Law Firm of Curt C. Hartman
7394 Ridgepoint Drive, Suite 8
Cincinnati, Ohio 45230
(513) 379-2923

ICE Response Plan — FHSD

I. Foundational Legal Context

Student Records & Confidentiality (Ohio Law)

Ohio law generally prohibits releasing or allowing access to personally identifiable student information except in limited circumstances (e.g., missing child investigations with parent consent).

School Access & Law Enforcement

Ohio law authorizes local boards of education to make rules governing entry to school grounds. Federal agencies are not automatically granted access to school property without proper legal authority.

Under current federal policy, schools are no longer designated as “sensitive locations.”

Federal agents may legally access publicly accessible areas of schools (e.g., sidewalks, vestibules/front offices, open after-school events).

Federal FERPA Protections

FERPA protects education records.

Disclosure without consent is permitted only under specific exceptions (e.g., court order, subpoena, judicial warrant, directory information).

II. Building Admin Assistants / Front Office Staff — First Contact

Immediate Steps/Information

O.R.C. 149.433

A. Maintain Calm Professionalism

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

B. Do Not Make Schoolwide Announcements

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

Communication must be:

- Factual
- Neutral
- Limited to what the school directly observed

O.R.C. 149.433

III. Principal / Building Administrator — Immediate Actions

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

Documentation Types:

- **Judicial warrant signed by a judge** (required for access beyond public areas)

- **Administrative ICE warrant (Forms I-200/I-205):**

- Issued by DHS
- Enforceable for civil immigration arrests in public areas only
- Does not authorize entry into schools without consent
- Generally does not authorize a search

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

B. Legal Review & District Notification

Immediately contact:

- Superintendent or designee (district will contact legal counsel)

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

O.R.C. 149.433

C. Documentation Requirements

Record the following:

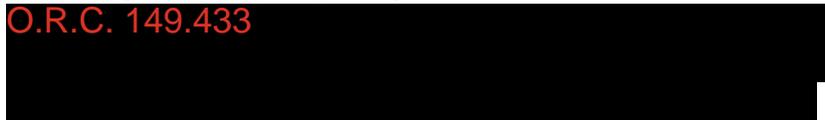
- Date and time
- Officer names and badge numbers
- Documentation presented (copy if permitted; photo if copying is not allowed)
- Actions taken by school staff

D. Classrooms & Students

Maintain normal instruction unless otherwise directed by safety personnel.

IV. Principal — Ongoing Responsibilities

O.R.C. 149.433



V. Bus Drivers — In Route or at Stops

O.R.C. 149.433



O.R.C. 149.433



B. After the Encounter

Notify:

- Transportation supervisor
- School administrator
- Law enforcement / SRO

Document the interaction when it is safe to do so.

VI. Communications Director — Messaging & Public Information

A. Centralize All Communication

All public messaging must be coordinated through district leadership.

Avoid speculation or personal opinions.

Do not release information that could violate privacy laws.

B. Internal & Parent Communication - Coordinated with Josh

Prepare notices that:

- Emphasize student safety
- Respect the legal process
- Reassure families the district follows state and federal law

C. Media Response (Josh)

Focus on safety and neutrality.

Do not share operational or student-specific details.

Sample Holding Statement (Internal):

“We are aware of law enforcement presence near our site. Student safety and privacy remain our priority. The district is following legal protocols in coordination with counsel.”

VII. Student Records & Privacy Law

Ohio law limits access to student records.

Never release records without:

- Parent/guardian consent, or
- Proper legal process (subpoena, court order, or valid warrant)

FERPA and Ohio law protections apply regardless of requesting agency.

Relevant Policy:

- Ohio Rev. Code 3313.20 (entry to school grounds)
- FHSD Policy 9150

VIII. After an Incident

Conduct an administrative debrief with the Superintendent.

Collect and secure all documentation.

Address staff and family concerns in coordination with the Communications Director and legal counsel.

IX. Other Things to Consider

- There will be a confrontation — ICE/Parent and/or Parent/School

O.R.C. 149.433

O.R.C. 149.433