

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.: 3:18CR165
	)	
Plaintiff,	)	JUDGE JEFFREY J. HELMICK
	)	
v.	)	
	)	
IBRAHIM ZUBAIR MOHAMMAD,	)	
	)	
Defendant.	)	
	)	

**GOVERNMENT’S NOTICE OF INTENT  
TO REQUEST ORDER OF JUDICIAL REMOVAL**

Notice is hereby given to Defendant, IBRAHIM ZUBAIR MOHAMMAD, and to his attorney of record, David Lee Klucas, that, consistent with his agreement with the United States, upon the conviction and sentencing of the defendant for violation of Title 18, United States Code, Section 2339C(c)(2)(B), Concealment of Financing of Terrorism, the United States shall request that the Court issue an Order of Judicial Removal against the defendant pursuant to Section 238(c) of the Immigration and Nationality Act of 1952, as amended, 8 U.S.C. § 1228(c).

Dated:

Respectfully submitted,

JUSTIN E. HERDMAN  
United States Attorney

By: /s/ Michael J. Freeman

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of April 2018, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Michael J. Freeman

Michael J. Freeman