

IN THE SUPREME COURT OF OHIO

Yunis Adon El Express Trust	)	
	)	
JONAH BURTON ADDIS AUTHORIZED	)	
	)	CIVIL ACTION FILE
PERSON	)	
	)	Case No.: 2020-1288
PLANTIFF/CLAIMANT,	)	
	)	
V	)	AND ALL ASSOCIATED CASE
	)	NO. WITH THIS MATTER
	)	<u>Motion for Summary Judgment</u>
DEFENDANT(S)	)	
	)	
OHIO DEPARTMENT OF JOB AND	)	
	)	
FAMILY SERVICES,ET AL.,	)	
	)	
(AGENCY) Office of Child	)	
	)	
Support	)	

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**MEMORANDUM IN RESPONSE TO DEFENDANT OHIO DEPARTMENT OF**  
**JOB AND FAMILY SERVICES AND DIRECTOR KIMBERLY HALL'S**

**MOTION TO DISMISS**

**I. INTRODUCTION**

Plaintiff Jonah B Addis is Authorized on behalf of Yunis Adon El Express Trust an Express Trust organization. The Express Trust is the Secured Party Creditor, first lien holder and real party of interest Domiciled in Georgia State under UCC filing number: 0602020-02194 who is entitled to full faith and credit and redress respectfully moves the court to dismiss the defendants motion to dismiss in its

entirety pursuant to Ohio Constitution 1851 IV. Judicial §2(B)  
(1)(iii) The Supreme Court shall have original jurisdiction in  
the following: (iii) Cases involving questions arising under the  
constitution of the United States or of this state, Quo  
warranto, mandamus, prohibiting by authority and Procedendo.  
Case in question CU01105388 SETS 7032394590 has been decided by  
Judge Thomas F. O'Malley on 08/11/2017 as journalized at volume  
146, page 1653, in the Cuyahoga County Court, Juvenile  
Division due to the child's emancipation. Since inception and up  
until the termination of this case monies from Jonah B Addis  
have been fraudulently taken without authorization or consent by  
Ohio Department of Job and Family Services Cuyahoga County  
Office of Child Support services hereby know as ("The Agency")  
As a result I seek permeant injunctive relief to stop taking/  
garnishing monies for unjust enrichment by using United States  
mail in conspiring to defraud Jonah Addis Estate in violation of  
Section 1341, Title 18, U.S Code fraudulently extorting money  
through larceny ORC 5924.121, Wrongful appropriation of funds,  
Theft O.R.C 2913.02 depriving the owner of property, embezzlement  
(stealing from an employer) and theft by taking.

**Furthermore there is no Support order because its been  
terminated by the Cuyahoga County Court of Common Pleas Juvenile  
Division on June 22, 2017 and journalized at volume, 146, page**

**1653, in the Cuyahoga County Court, Juvenile Division** yet income withholding orders have been sent to recent employers of Jonah B Addis to maliciously to take wages and earnings from the Jonah B Addis Estate Which is property of the Yunis Adon El Express Trust.

Kimberly Hall is party to the case because Cuyahoga County Health and Human Services Office of Child Support Service is enforcing a fictions order that has been terminated. Hall is the Director and responsible for all agents and its assignees of the Government Agency.

Im Asking the Ohio Supreme court in the order of fairness of justice for the benefit of the beneficiary to enforce the judgement issued by Cuyahoga County Court of Common Pleas Juvenile Division. Order Kimberly Hall ODJFS Director to act in the capacity she was appointed to act by Governor Mike Dewine. Plaintiff is seeking permanent inductive relief and all monies returned since inception of order CU01105388 Set 7032394590 because the Child Support order was terminated, it was done fraudulently in the beginning, it was not in the legal name of the plaintiff, without due process of law, improper service and no motion was filed by any of the parties to the case to request child support services.

The agency abused its powers and was unjustly enriched.

A Constitutional and political question has been raised in this matter.

## **II.**

### **NATURE OF ACTION**

1. This case arises out of a serious of brazen fraudulent schemes orchestrated by the Assignees and Agents of Cuyahoga County Health and Human Services Office of Child Support services Agency which falls under Ohio Department Of Job and Family Services Office of Child Support Enforcement Agency and their agents and Director Hall to acquire the assets of Jonah B Addis which is property of the Yunis Adon El Express Trust (Secured Party UCC filing number 0602020-02194) by fraudulently extorting money through larceny ORC 5924.121 Wrongful appropriation of funds, Theft O.R.C 2913.02 depriving the owner of property,embezzlement (stealing from an employer)theft by taking and using United States mail in conspiring to defraud Jonah Addis Estate in violation of Section 1341, Title 18, U.S Code for the benefit of the Ohio Department of Job and Family Services Office Of Child Support for unjust enrichment.

2. As reported in the complaint. The initial case was for a change of custody and child support was not part of the agreement. No parties to the case moved to the Court to

enforce child support on the Plaintiff. Child support was enforced Without notice, service, or due process of law, child support was enforced by the Cuyahoga County Office of Child support services and not by motion of the parties to the case. Upon further review of the case file I noticed that the initial motion was not in the legal name of the Plaintiff there was no signed consent to be a customer of Cuyahoga Cuyahoga Child Support Enforcement services from any of the parties with first hand knowledge involved in the case. Since then there has been a slew of motions contesting order CU01105388 and SETS 7032394590 even after termination of the order which was August 11,2017. From at least August 18, 2004 through the present day the Cuyahoga Office of Child Support services which falls under Ohio Department Of Job and Family Services Office of Child Support Enforcement Agency has been taking money through illegal means from Jonah B Addis by way of a fraudulent child support order initiated by an agent of the corporation "Raymond C James" Support Officer on behalf of the State Of Ohio and Cuyahoga County. During the past 16 years from 2004-present 2020 Jonah B Addis has suffered terrible economic loss from the administrative courts decision. The agency is fraudulently extorting money through larceny ORC 5924.121 Wrongful appropriation of funds, Theft O.R.C 2913.02 depriving

the owner of property,embezzlement (stealing from an employer)theft by taking and using United States mail in conspiring to defraud Jonah Addis Estate in violation of Section 1341, Title 18, U.S Code.

3. Director Hall, Cuyahoga County Administrator, and Director of cuyahoga county all have been notified on several occasions by notice and affidavit that the case has been terminated yet Hall did not fulfill her duty as Director to terminate collection activities after notice that the case has been terminated. The Defendant and its agents and assignees have demonstrated malice, aggravated and egregious fraud. This action seek to move the Court to order Kimberly Hall to properly fulfill her official duties and correct the abuse of power by her agents from inception of this case, Order her Agency to stop and restrain collections activities from Jonah B Addis and Remove the Name Jonah Burton Holmes and Jonah Burton Addis off of the Department Of Health And Human Services Passport denial list. My right to travel has been fraudulently and maliciously blocked by this Ohio State Government Agency and violates my God given right to travel unmolested and impedes on my liberty and pursuit of happiness.

4. I seek redress and monetary damages for the harm to me from the fraud perpetuated by the Ohio Department of Job and

Family Services Office Of Child Support its agents and assignees.

Each of the Defendants was unjustly enriched, by fraudulently extorting money through larceny ORC 5924.121 Wrongful appropriation of funds, Theft O.R.C 2913.02 depriving the owner of property,embezzlement (stealing from an employer)theft by taking and using United States mail in conspiring to defraud Jonah Addis Estate in violation of Section 1341, Title 18, U.S Code, committed racketeering activities in violation of Ohio State law, and engaged in a civil conspiracy.

The Agency Ohio Department Of Job and Family Services and Director Kimberly Hall are liable to Yunis Adon El Express Trust for millions of dollars in losses. Jonah B Addis could not be issued a passport to work in his profession (International Relations) nor could he complete humanitarian works abroad of which Yunis Adon El Express Trust has ordained him to do as a part of his religious duties in honor of his creator to help uplift fallen humanity.

These malicious acts violate several the constitutional protections, Articles of Confederation and treaties that govern the bylaws of this Express Trust.

This appears to be an act of involuntary servitude by making

Jonah B Addis a prisoner in his own land and not at liberty to travel freely outside of the united states to complete humanitarian works.

This egregious act has cause tremendous financial harm to Jonah B Addis. Jonah B Addis graduated with a degree in International Relations as a result of this fraudulent act he could not take a very lucrative career because this agency sent notice to Health and Human Services to block his passport for debt of which he cant possibly owe TO a terminated support order.

5. The "agency" and its agents and assignees were asked to answer interrogatories and asked for discovery to show cause on how a debt is owed by Jonah Addis when the support order has been terminated but the "agency" and its agents and assignees chose not answer and has defaulted by Acquiescence. With all of this said they Ohio Department of Job and Family Services "The Agency" are still garnishing the earnings, wages of Jonah B Addis with no evidence of money going to the parents or the offspring so who is it going to?

"The Agency" is unjustly enriching itself by by fraudulently extorting money through larceny ORC 5924.121 Wrongful appropriation of funds, Theft O.R.C 2913.02 depriving the owner of property,embezzlement (stealing from an employer)theft by taking and using United States mail in



conspiring to defraud Jonah Addis Estate in violation of Section 1341, Title 18, U.S Code which is fraud and unlawful.

The issue is fraud, larceny, embezzlement, mail-fraud, a persons legal right to hold office. I demand Hall who is a Government Official to properly fulfill her official duties and correct an abuse and order to stop trespassing on trust property and violating my rights protected by the constitution.

**III.**

### **JURISDICTON AND VENUE**

6. This Court has jurisdiction over this action because Plaintiff seeks equitable relief. The Original jurisdiction was COURT OF COMMON PLEAS, JUVENILE DIVISION CUYAHOGA COUNTY, OHIO ON August 11, 2017 as journalized at volume 146, page 1653, in Cuyahoga County Court, Juvenile Division Case CU1105388 was terminated and Juvenile Court has decided on the matter. As result The Court should Dismiss the Defendants Motion for failure to state a sufficient claim upon which relief can be granted.

**The Court Should not dismiss the plaintiffs case for lack of jurisdiction or dismiss claims against ODJFS and Director Hall because ODJFS is collecting on a terminated support order and Hall is the Officer appointed by the Governor who is the**

Director of ODJFS and her official duties are to stop and restrain collection activities, Hall is also responsible for RETURN OF PAYMENTS, Uniform implementation. O.R.C 3119.94

A) Hall is The director of job and family services and shall adopt rules that provide for all of the following:

(1) The payment to the appropriate person of any funds that a court or child support enforcement agency has impounded under section 3119.90 or 3119.92 of the Revised Code;

(2) The return to the appropriate person of any other payments made pursuant to a child support order if the payments were made at any time after the child support order has been terminated pursuant to section 3119.90 or 3119.92 of the Revised Code;

(3) Any other standards, forms, or procedures needed to ensure uniform implementation of sections 3119.86 to 3119.94 of the Revised Code.

(B) With respect to the court order for impoundment required under division (A)(1) of section 3119.90 of the Revised Code, the director of job and family services may adopt rules that specify a form for the order or approve a form developed by the Ohio judicial conference.

**The Defendant Ohio Entities** are subject to this Court's jurisdiction because each of the Defendant Ohio Entities was established under Ohio law as administrative department of the

Ohio State government.

**The Individual Defendants** are subject to this Court's jurisdiction pursuant ORC-707.23 and their participation in the conspiracy and fraud described herein.

The Venue is proper before this Court because the Defendants are organized under the laws of Ohio, all Defendants conspired specifically to perpetuate the Schemes by establishing and maintaining the plaintiffs real property assets at issue in this action, and because these actions Plaintiff seeks equitable relief under Ohio law.

**IV.**

## **PARTIES**

**PLAINTIFF YUNIS ADONE EL EXPRESS TRUST A EXPRESS TRUST**

### **ORGANIZATION**

7. Yunis Adon El Express Trust and Express Trust Organization is the first lien holder beneficial owner of Jonah B Addis estate Notice of Secured Party Filing Number 0602020-02194 Notice of UCC filing March 20,2020 Notice of collateral description:

See UCC Financing Statement Section 4. Amount of Lien on Debtor JONAH B ADDIS \$9,000,000,000,000.

JONAH B ADDIS injured party the fraudulent child support order was placed against.

8. JONAH B ADDIS the insured party who the fraudulent support order was placed. Jonah has been damaged by the acts of ODJFS and Director Hall by these unlawful fraudulent acts.

### **THE INDIVIDUAL DEFENDANTS**

9. Defendant Kimberly Hall ("Hall") d/b/a the Director of the ODJFS Ohio Department of Job and Family Services a \$3.7 billion agency with approximately 2,400 employees. Hall is responsible for supervising the states public assistance, workforce development, unemployment insurance, child and adult protective services, adoption, child care, and child support programs. Hall was appointed by the GOV. Mike Dewine Mike Dewine also serves as Governor of Ohio. This Government organization is participating in unjust enrichment, engaged in extorting money through larceny ORC 5924.121, Wrongful appropriation of funds, Theft O.R.C 2913.02 depriving the owner of property, embezzlement (stealing from an employer) theft by taking and using United States mail in conspiring to defraud Jonah Addis Estate in violation of Section 1341, Title 18, U.S Code.

10. **Kimberly Hall** is being sued in her official capacity for acting with a malicious purpose, wanton or reckless manner and in bad faith because she has been notified on more than 3 occasions that this case has been terminated and **she is**

**responsible for RETURN OF PAYMENTS**, Uniform implementation.

O.R.C 3119.94

A) The director of job and family services shall adopt rules that provide for all of the following:

(1) The payment to the appropriate person of any funds that a court or child support enforcement agency has impounded under section 3119.90 or 3119.92 of the Revised Code;

***(2) The return to the appropriate person of any other payments made pursuant to a child support order if the payments were made at any time after the child support order has been terminated pursuant to section 3119.90 or 3119.92 of the Revised Code;***

(3) Any other standards, forms, or procedures needed to ensure uniform implementation of sections 3119.86 to 3119.94 of the Revised Code.

(B) With respect to the court order for impoundment required under division (A)(1) of section 3119.90 of the Revised Code, the director of job and family services may adopt rules that specify a form for the order or approve a form developed by the Ohio judicial conference.

<https://jfs.ohio.gov/director/#::~text=Kimberly%20Hall%20is%20director%20of,agency%20with%20approximately%20%2C400%20employees>.

## **THE DEFENDANT OHIO ENTITIES**

11. Defendant Ohio Department of Job and Family Services Office of Child Support agency.

The Ohio Department of Job and Family Services is the administrative department of the Ohio state government responsible for supervising the state's public assistance, workforce development, unemployment compensation, child and adult protective services, adoption, child care, and child support programs. Which also governs Cuyahoga County Job and Family Services Child support Services who initiated case CU01105388 SETS 7032394590.

No law shall be passed or rule made whereby any person shall be prevented from invoking the original jurisdiction of the Supreme Court.

### **I. STATEMENT OF FACTS**

12. Paternity was established through CSEA Case #P0062026 between Mother Gwen Wilson and Father Jonah Addis. This account was paid in full to a \$0.00 balance with a over payment check paid to Jonah Addis on 04-01-2016. The Mother and grandmother initiated a request for custody change along with the father's consent under duress. Josephine Cook and the mother Gwen Wilson and singed a Custody change on 09/28/2002 and by the father Jonah Addis singed on 01/03/-2003 a year later. Child support

was not apart of this agreement and would be addressed at a later date if initiated by the parents.

13. The parents never agreed to initiate child support and the child support was initiated by Motion To Establish Support under new case CU01105388 Sets 7032394590 on August 18th 2004 by Raymond C. James. James of which I have no knowledge of who he is or how he is a party to this case initiated this support order without the consent of the parents or by Motion of the parents. This Child support order was done in fraud. Raymond C James was not a party to the signed agreement CUYAHOGA COUNTY COURT OF COMMON PLEAS JUVENILE DIVISION DISPUTE RESOLUTION PROGRAM MEDIATION AGREEMENT Section VIII CHILD SUPPORT between the parents that states under section VIII CHILD SUPPORT "Child support issues are not addressed in this agreement. **Any change in child support will be dealt with by a separate proceeding initiated by the parents**" Support Officer Raymond James is not a parenting this case or party to the case, but was given authorization to initiate a support order that went against the contract signed by the parents. He was not a party to the signed agreement between the parents and initiated this support order without the authorization and consent of the parties involved. In addition there was no proof of service, lack of due process and no agreement to participate

by either party to be a customer of Child Support Services.

14. After obtaining a certified copy of the case file from the courts new evidence of fraud has been revealed. It is determined that the initial motion to establish support by Raymond C James not only was it done in fraud but there was a misspelling of the name Jonah Addis **the motion for support was in the name Jorah Addis which is an error.**

15. There was a breach of contract by intermeddling by the "Agency" Officer Raymond C. James. The parties agreed under section VIII on the agreement signed by all parties "CUYAHOGA COUNTY COURT OF COMMON PLEAS JUVENILE DIVISION DISPUTE RESOLUTION PROGRAM MEDIATION AGREEMENT Section VIII CHILD SUPPORT "Child support issues are not addressed in this agreement. Any change in child support will be dealt with by a separate proceeding initiated by the parents" no parents initiated a Motion to move the court for child support since inception and there was no previous child support.

16. The initial fraudulent support order was \$274.50 then a NOTICE OF CSEA SUPPORT ORDER MODIFICATION REIEW FINDINGS/ RECOMMENDATIONS was done under duress and a 73% change occurred to \$475.81 on 08/28/2008 without my consent or no original motion by the parents. ALL modifications and child support orders were done without my consent as I was living in another



state and did not participate in the court proceedings nor did I receive notification until I money was taken from my check without proof of service and I never received a summons. Once alerted of the fraud, I begin filing a slew of motions to contest the order and dismiss it. There was even a private agreement between the Care taker Josephine Cook and Jonah Addis that was presented to the court by the Obligee to dismiss the case because she never consented to the child support order but the Judge did not allow the case to terminate even when it was initiated by the care taker. This is inventory servitude and extortion to pay under threat, duress and coercion. I wrote in protest to Cuyahoga County Job and Family services back in 2015 for violating my right to contract that they were in breach of my rights protected by the Ohio constitution by violating my to contract and my right to a trial by jury and they would be sued.

17. I also completed an affidavit of revocation of my signature for good cause even though I never signed up to participation child support just in case anyone forged my signature on October 1st 2015. I also informed the the agency and agents that they would be sued for monetary damages for violation of a commercial security agreement and also gave a notice of lien on Jonah B Addis on 1-24-2004. I denied any agreement to participate in child support from its inception.

This is an act of involuntary servitude and extortion was a violation of my religious freedoms and liberties protected by the constitution. As its against my religious beliefs to participate in a child support system with the mark of the beast in it such as TITLE 42 U.S Code §666 and I expressively wrote correspondence to the director and agents that they would be sued for monetary damages for violating my rights protected by the constitution.

18. Then there was another administrative review which I did not consent to taking the previous order from \$475.81 to 739.94 this was without consent and was an act of extortion and embezzlement of my wages through (theft by employment) effective on 06/01/2015. I never received notice of this until the money was coming out of my paycheck without my consent and I denied all allegations.

19. On August 17 2017 the Grandmother Josephine cook petitioned the court to dismiss the case and if there where any arrears owed she agreed to forgive them because we never consented to participate in Child support enforcement agency this was stamped in the record on 08-17-2017 at 9:59 am via Affidavit signed by the obligee and notarized into the court and the court judge did not honor our request. Thats a constitutional violation of our right to contact and

involuntary servitude. Which had been violated in the past.

20. It was determined by the Cuyahoga County Executive Cuyahoga Job and Family Services (CJFS) Office of Child Support Services (OCSS) as during 02/08/2017 that the alleged Obligor owes a balance of which was owed to the Obligee Josephine Cook of which I deny is owed. The case was terminated and no monies go to her or my offspring so how is the Agency still garnishing the wages of Jonah B Addis? How does this agency give false and misleading information to block his right to leave the country? No monies are going to the alleged "Obligee" but the monies due are going to the agency? This is malicious fraud and unjust enrichment.

21. The plaintiff is seeking relief for Economic loss and loss of other expenditures wages, salaries and other compensation as a result of the fraudulent order as the agency and continues to extort monies from Jonah B Addis after termination of the case and from its inception. Plaintiff is seeking defendant to estoppel as they have no basis to argue or collect earnings, embezzle money by taking (through employment) or assert the right to collect as that contradicts the judges termination order. The judge in the lower court has dismissed the case and this is a a blow to my rights protected by the constitution and individual freedoms by fraudulently

invoking a child support order without written consent, due process of law, or improper service.

The OHIO DEPARTMENT OF JOB AND FAMILY SERVICES, ET AL.,  
(AGENCY) Office Of Child Support has violated:

### **OHIO Constitution 1851 Violations**

#### **Article I Bill Of Rights**

No separation of Powers it appears that the upper-level have the power for creating their own detailed rules and procedures. The Judge Terminated this case and after several notices to agents and assignees this case is still in collections. This is a violation of Separation of Powers by Delegating "ultimate authority to this agency as it seems to ignore the judges order" and Im entitled to Equal protection of the law. Im entitled to labor freely without restraint. Yet I cant labor without the fear of this agency garnishing my wages in an unlawful manor. Jonah B Addis is being wrongfully deprived, personal property has been taken without just compensation, he is not getting equal protection of the law, his constitutional rights have been trampled on, right to a passport taken and in the fairness of justice he needs to be made whole for violations of:

### **Ohio Constitution 1851 Violations:**

#### **Article 1. Bill Of Rights**

**Section 2.** All political power is inherent in the people.

Government is instituted for their equal protection and benefit, and they have the right to alter, reform, or abolish the same, whenever they may deem it necessary; and no special privileges of immunities shall ever be granted, that may not be altered, revoked, or repealed by the General Assembly. Has been violated in the past by the Agency abusing its power to trespass on Jonah B Addis income and ignoring a termination order from the judge and charging interest on a debt he does not own nor did he take out a loan with this agency.

**Section 6.** There shall be no slavery in this State; nor involuntary servitude, unless for the punishment of crime. Has been violated in the past through extortion, larceny, mail fraud and embezzlement for taking Jonah B Addis money through employment with fraudulent Income withholding order on a terminated support order and trapping him in his own land by force because he cant obtain a passport to travel outside the U.S because the Department of Health and Human services has blocked his right to travel for a debt he does not owe.

**Section 7.** All men have a natural and indefeasible right to worship Almighty God according to the dictates of their own conscience. No person shall be compelled to attend, erect, or support any place of worship, or maintain any form of worship, against his consent; and no preference shall be given, by law,

to any religious society; nor shall any interference with the rights of conscience be permitted. No religious test shall be required as a qualification for office, nor shall any person be incompetent to be a witness on account of his religious belief; but nothing herein shall be construed to dispense with oaths and affirmations. Religion, morality and knowledge, however, being essential to good government, it shall be the duty of the General Assembly to pass suitable laws, to protect every religious denomination in the peaceable enjoyment of its own mode of public worship, and to encourage schools, and the means of instruction. Has been violated in the past. Its against my religious beliefs to participate in a Child support system with the mark of the beast in its title under 42 U.S. Code § 666 we didn't ask to get involved with this from the initial application it was only a chance of custody. Child support was not a part of the agreement.

**Section 14.** The right of the people to be secure in their persons, houses, papers, and possessions, against unreasonable searches and seizures, shall not be violated; and no warrant shall issue, but upon probable cause, supported by oath or affirmation, particularly describing the place to be searched, and the person and things to be seized. Has been violated in the past. They are using private trust property that the trust is

holder and due course of by use of the social security number to track and garish income from Jonah B Addis though embezzlement, larceny, fraud and there is no judges order for support.

**Section 15.** No person shall be imprisoned for debt in any civil action, on mesne or final process, unless in cases of fraud. Has been violated in the past. Im imprisoned in America and cannot leave the country with the proper passport because of a fraudulent child support order which has blocked my right to obtain a passport fort a unverified balance owed when there in no open case. The balance should reflect 0.00 because the child support case has been terminated and and garnishment should be Void ab initio. Has been violated in the past.

**Section 19.** Private property shall ever be held inviolate, but subservient to the public welfare. When taken in time of war, or other public exigency, imperatively requiring its immediate seizure, or for the purpose of making or repairing roads, which shall be open to the public, without charge, a compensation shall be made to the owner, in money; and in all other cases, where private property shall be taken for public use, a compensation therefor shall first be made in money, or first secured by a deposit of money; and such compensation shall be assessed by a jury, without deduction for benefits to any property of the owner. Has been violated in the past. My

earnings, wages, right to travel outside the country, right to my nationality has been violated the past.

Violated:

## **OHIO Constitution 1851 Violations**

### **Article II. LEGISLATIVE**

**Section 26.** All laws of a general nature, shall have a uniform operation throughout the State; now shall any act, except such as relates to public schools, be passed, to take effect upon the approval of any other authority than the General Assembly, except as other provided in this constitution. Has been violated in the past. My rights protected by the constitution has been violated by expost facto law.

**Section 28.** The General Assembly shall have no power to pass retro-active laws, or laws impairing the obligation of contracts; but may, by general laws, authorize courts to carry into effect, upon such terms as shall be just and equitable, the manifest intention of parties, and officers, by curing omissions, defects, and errors in instruments and proceedings, arising out of their want of conformity with the laws of this State. has been violated in the past. We singed a contract that the parents would initiate a child support order if we deemed it necessary and we never did deem it necessary we never filed a motion to move the court to request child support from any



parties to the case. My right to contract was violated, with laws that went against this constitution, which impaired the obligation of a contract. There were no terms or no contract with this agency that were equitable. Equity relief is being sought for fraud, racketeering, larceny, mail fraud, embezzlement, failure to honor a contract and violating my right to travel, my pursuit of happiness and my liberties. Have been violated in the past.

The OHIO DEPARTMENT OF JOB AND FAMILY SERVICES, ET AL., (AGENCY) Office Of Child Support has violated the

#### **US Constitution**

#### **Supremacy clause Article VI Paragraph 2.**

This Constitution, and the laws of the United States which shall be made in pursuance thereof; and all treaties made, or which shall be made, under the authority of the United States, shall be the supreme law of the land; and the judges in every state shall be bound thereby, anything in the Constitution or laws of any State to the contrary notwithstanding. Has been violated in the past as the Articles of confederations states

**Articles of Confederation March 1, 1781 Article IV** and Treaties that Govern the Yunis Adon El Express Trust.

The better to secure and perpetuate mutual friendship and

intercourse among the people of the different States in this Union, the **free inhabitants of each of these States**, paupers, vagabonds, and fugitives from justice excepted, **shall be entitled to all privileges and immunities of free citizens in the several States; and the people of each State shall free ingress and regress** to and from any other State, and **shall enjoy therein all the privileges of trade and commerce, subject to the same duties, impositions, and restrictions as the inhabitants** thereof respectively, provided that such restrictions shall not extend so far as to prevent the removal of property imported into any State, to any other State, of which the owner is an inhabitant; provided also that no imposition, duties or restriction shall be laid by any State, on the property of the United States, or either of them.

If any person guilty of, or charged with, treason, felony, or other high misdemeanor in any State, shall flee from justice, and be found in any of the United States, he shall, upon demand of the Governor or executive power of the State from which he fled, be delivered up and removed to the State having jurisdiction of his offense.

Full faith and credit shall be given in each of these States to the records, acts, and judicial proceedings of the courts and magistrates of every other State. has been violated in the past

by taking away my right to travel abroad free Ingress and regress, (Blocking my passport) which is stopping me from doing trade and commerce in my trained profession international relations.

The DEPARTMENT OF JOB AND FAMILY SERVICES, ET AL., (AGENCY) Office Of Child Support is engaging in conduct involving dishonesty, fraud, deceit and misrepresentation. Has been violated in the past.

## **II. LAW AND ARGUMENT**

### **Standard of Review**

The standard of review for accepting this case is pursuant to O.R.C 3119.86 Continuing support obligation beyond child's eighteenth birthday. (1) The duty of support to a child imposed pursuant to a court child support order shall continue beyond the child's eighteenth birthday only under the following circumstances: (B) **A court child support order shall not remain in effect after the child reaches nineteen years of age unless the order provides that the duty of support continues under circumstances described in division (A) (1) (a) or (b) of this section for any period after the child reaches age nineteen. An administrative child support order shall not remain in effect after the child reaches age nineteen.**

When one of two innocent persons must suffer by the act of a

third person, he who put it in the power of the third person to inflict the injury shall bear the loss.

This Fraud was discovered when I received court records from Juvenile court of common plea With the initial motion filed in another name that was not the Legal Name of the Plaintiff.

Misrepresentation of a material fact, made willfully to deceive or recklessly without knowledge and acted on by the opposite party or made innocently and mistakenly and acted on by the opposite party, constitutes legal fraud.

Equity jurisdiction over matters of account shall extend to:

- (1) Mutual accounts growing out of privity of contract;
- (2) Cases where accounts are complicated and intricate;
- (3) Cases where a discovery or writ of ne exeat is prayed and granted;
- (4) Cases where the account is of a trust fund;
- (5) Accounts between partners or tenants in common; and
- (6) Cases where a multiplicity of actions would render a trial difficult, expensive, and unsatisfactory at law.

### **III. Conclusion**

For the foregoing reasons, the Court should dismiss defendants Motion for failure to state a claim upon which

relief can be granted. See Civ.R. 12(B)(1),(6), the Defendant has submitted an unverified complaint which should not be sufficient for summary judgment *Trinsey v. Pagliaro*, 229 F. Supp. 647 "Statements from counsel in a brief or an argument is not sufficient for summary judgment"

We ask the court to Order ODJFS to stop collection on a terminated order.

We ask the Court to Order Kimberly Hall to address ODJFS agents who are acting in the capacity of a judge by fraudulently having them sign IWO (income with holding orders) as authorized representatives on terminated support orders when they are not a judge.

We ask the court to Direct Hall to fulfill her official duties and correct abuse by her agents at OJDFS Office of child support, and order to restrain and stop collection activities on JONAH B ADDIS wages and income (through Employment) and return moines back to Jonah B Addis since inception and since termination of the case.

Hall has an Official duty to perform as appointed by the Governor and she has not done her duty to be sure that equal protection of the law is enforced.

Plaintiff has suffered a horrible loss of income, loss of the right to travel abroad, to a conduct trade or business abroad,


tarnished reputation, false negative reporting of information on credit report, loss of family, relationships, freedom, pursuit of happiness and liberties that a natural person who is afforded unalienable rights protected by the constitution should always have. Therefore this case should proceed in its entirety.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Given under my hand and seal of office this 23rd day of November 2020.

Respectfully submitted,

BY: Addis, Jonah Burton,

Authorized person for Yunis Adon El Express Trust and Express

 Trust Organization,

UCC 1-306, UCC 1-308, UCC 1-301, UCC 1-307  
Addis, Jonah B, Authorized Person of  
Yunis Adon El Express Trust  
Dba JONAH BURTON ADDIS

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## CERTIFICATE OF SERVICE

This is to certify that on November 23, 2020, pursuant to Civ.R. 5(B)(2)(c)(E), a true and accurate copy of the foregoing Motion to Dismiss was sent by regular U.S. mail, postage prepaid, to the following:

Ohio Attorney General DAVE YOST

/s/Assistant Attorney General Theresa R. Dirisamer.

Health and Human Services Section 30 East Broad Street, 26th  
Floor Columbus, Ohio 43215-3400

I caused the foregoing Memorandum In Response To Defendants Motion to Dismiss to be filed electronically in accordance with the Court's Electronic Filing guidelines, with notice of this filing sent to Defendant via email

[theresa.dirisamer@ohioattorneygeneral.gov](mailto:theresa.dirisamer@ohioattorneygeneral.gov)

Counsel for Defendant:

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Given under my hand and seal of office this 23rd day of November 2020.

Respectfully submitted,

BY: Addis, Jonah Burton,

Authorized person for Yunis Adon El Express Trust and Express  
Trust Organization,

  
UCC 1-306

UCC 1-306, UCC 1-308, UCC 1-301, UCC 1-307

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