

08-1370

IN THE SUPREME COURT
OF THE STATE OF OHIO

TITUS L JONES
RELATOR

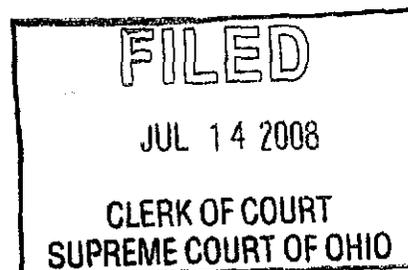
Vs

CHILD SUPPORT ENFORCEMENT AGENCY
CITY OF TOLEDO, LUCAS COUNTY, OHIO
RESPONDENT

ORIGINAL ACTION FOR MANDAMUS

VERIFIED COMPLAINT FOR WRIT OF MANDAMUS

TITUS L JONES
2188 LEONARD
COLUMBUS OH
43219



SUPREME COURT FOR THE STATE OF OHIO

TITUS L JONES
2188 Leonard St.
Columbus Ohio

v.

Child Support Enforcement Agency (CSEA)
701 Adams St.
Toledo, OH 43604
(419) 213-3001

COMPLAINT FOR AN ORIGINAL WRIT OF MANDAMUS JURISDICTION

This is an original action for a Writ of Mandamus, compelling Respondents to Comply with their clear legal duty pursuant to Revised Code § 3505.30 Ohio sunshine laws and federal freedom of information act release the file and all journal entrys for the Petitioner R.C. § 2731; Section 2, Article IV, Ohio Constitution for a Writ of Mandamus directed to Mandamus is appropriate remedy to compel compliance with Public Records Act

WHEREFORE, Relator seeks a Peremptory Writ of Mandamus or, in the alternative, an Alternative Writ of Mandamus commanding Respondent Lucas County CSEA to comply with their statutory and legal duties.



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The petitioner further state that ex rel/ Uant v. Conrad (Ohio, 03-01-1996) 74 Ohio St. ed 681, 660 N.E.2d 1211, 1996-Ohio-234, Mandamus Child Support records are records that are held by the child support enforcement agency the petitioner is the person name in the records and request that they be released.

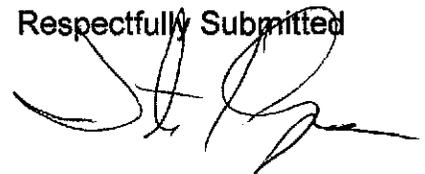
2. pursuant to the provisions of R.C. 121.22, R.C. 149.43, R.C. 507.04, R.C. 507.07 and the precedent of this Court, including State ex rel. Long v. Cardineton Village Council (2001), 92 Ohio St.3d 54, (CSEA) Is required to maintain records and notice of hearing that are held and release such information for further review. Lucas County CSEA has refused to release this information which is now on micro-fishe to the petitioner. Respondent Director Lucas County CSEA has failed to comply fully and completely with her/his duty to prepare, file, and maintain full and accurate minutes and records for Administrative Review Hearing held at the Toledo Lucas County CSEA and to make them available for public inspection

3. Section 16, Article I of the Ohio Constitution, “[a]ll courts shall be open.” “The right to a public trial is an important, fundamental constitutional guarantee of both the United States and Ohio Constitutions.” *State v. Lane* (1979), 60 Ohio St.2d 112, 119, 14 O.O.3d 342, 397 N.E.2d 1338, citing the Sixth Amendment to the United States Constitution and Sections 10 and 16, Article I of the Ohio Constitution and (CSEA)JFS 07082-Notice Regarding Request for

Administrative Hearing. The agency is required As such the petitioner has a right to the records being sought for which are being held by the Lucas County CSEA, to present them at trial in the Franklin County Court Of Common Pleas Juvenile Division.

In Conclusion , Relator seeks a Peremptory Writ of Mandamus or, in the alternative, an Alternative Writ of Mandamus commanding Respondent Lucas County CSEA to comply with their statutory and legal duties (i) to prepare, file, and maintain full and accurate minutes and records relating to meetings of and release a complete copy the entire file under DR92-1031, pursuant to the provisions of Sections 121.22, 149.43, 507.04 and 507.07 of the Revised Code, the sunshine laws of the state of Ohio and the Federal freedom of information act as well as reasonable fees for damages and attorneys fees.

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'Titus L. Jones', written over the printed text 'Respectfully Submitted'.

Titus L Jones
2188 Leonard
Columbus O

Memorandum of Support

Now comes the Titus L Jones and request states the following: I was notified by mail that the Child Support Enforcement Agency was filing a complaint for contempt of court for the change in with holding preformed by the agency.

I request from the child support agency in Toledo Ohio a copy the records showing that child support was stopped until the mother Anoinette Swank (Jones) allowed this petitioner to see the children in question. The mother of the children had stated that she did not want the petitioner to see the children in violation of the Order from the Lucas County Courts.

The petitioner has gone to Toledo on several occasions to get a copy of the records from the child support enforcement agency he request has been denied then some records sent the no other information than some records sent. The petitioner than contacted Tracy Smith from the child support enforcement agency and again requested the documents and notes showing why child support was terminated in 1994. The information again was not furnished therefore the petitioner request that this honorable court would order the Lucas County Child Support enforcement agency to release all records and notice that it has in case number DR 92-1031..The government is hiding behide this walls the information that is sought, the government is bring a case against a citizens of this great state for no reason, The Case is in the Franklin County Court Of Common Pleas

State of Ohio v. Titus L Jones in contempt of court for non payment of child support 96- JC 400 Franklin County. When the two issues that they petitioner wants to bring to court is 1. The children in question are not his 2. The court order for Toledo was clear that in the event the child were found to be child support would be stopped until the mother Antoinette Jones complied with the court ordered visitation. Of which she has not complied for the past 15 years and now all the children are adults.

WHEREFORE, Relator seeks a Peremptory Writ of Mandamus or, in the alternative, an Alternative Writ of Mandamus commanding Respondent Lucas County CSEA to comply with their statutory and legal duties (i) to prepare, file, and maintain full and accurate minutes and records relating to meetings of and release a complete copy the entire file under DR92-1031, pursuant to the provisions of Sections 121.22, 149.43, 507.04 and 507.07 of the Revised Code, the sunshine laws of the state of Ohio and the Federal freedom of information act as well as reasonable fees for damages and attorneys fees.

Respectfully Submitted



Titus L Jones
2188 Leonard
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Jamela D. Leslie
Franklin County
My Commission Expires
4/18/09

Attachment not scanned