

**IN THE
SUPREME COURT OF OHIO**

**Royal Public Official, Ms. Yvette
Barbara Baldwin**

CASE NO. 12-1072

Relator

**ORIGINAL ACTION IN
MANDAMUS**

vs.

**HAMILTON COUNTY CLERK OF
THE COURT OF COMMON PLEAS**

Respondent

**MOTION TO DISMISS AND MEMORANDUM IN SUPPORT OF MOTION TO
DISMISS OF RESPONDENT**

Yvette Barbara Baldwin
8112 Constitution Drive
Cincinnati, Ohio 45215

PRO SE RELATOR

JOSEPH T. DETERS
PROSECUTING ATTORNEY
HAMILTON COUNTY, OHIO

Christian J. Schaefer, 0015494
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ATTORNEY FOR RESPONDENT

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IN THE
SUPREME COURT OF OHIO

State ex rel. ROYAL PUBLIC OFFICIAL :
YVETTE BARBARA BALDWIN

CASE NO. 12-1072

Relator :

ORIGINAL ACTION IN MANDAMUS

vs. :

Hamilton County Clerk of the Court of
Common Pleas :

RESPONDENT'S MOTION TO
DISMISS

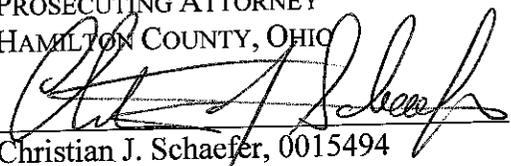
Respondent :

:

Now comes respondent, Hamilton County Clerk of Courts, through undersigned counsel,
who respectfully moves that this original action in Mandamus be dismissed in accordance with
S.Ct.Prac.R. 10.5.

Respectfully submitted,

JOSEPH T. DETERS
PROSECUTING ATTORNEY
HAMILTON COUNTY, OHIO


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ATTORNEYS FOR RESPONDENTS

MEMORANDUM

A. Statement of the Case

This Original Action in Mandamus complains that the respondent, The Hamilton County Clerk of the Court of Common Pleas, did not grant Relator access to the “Jordanian Royal Treasury Display.

The petition is a narrative in which the relator, Ms. Yvette Barbara Baldwin, asserts that she is entitled to access to the Royal Jordanian Treasury Display, as well as a significant inheritance, as a result of her name being attached to the exhibit.

As far as is discernible from her complaint, Ms. Baldwin at one point worked for the Hamilton County Clerk of Courts. (Complaint at 3). During the course of her employment, she viewed an exhibit called the “Jordanian Royal Treasury Display”, which at the time was located in the Hamilton County Court House. (Complaint at 3). Upon viewing the exhibit, Ms. Baldwin observed that tags marked “Yvette Baldwin,” “Yvette B. Baldwin,” and/or “Yvette K.” were attached to the exhibit. (Affidavit of Yvette Barbara Baldwin at 1). The exhibit’s included the “Jordanian Royal Land Creed,” the contents of which, the relator interpreted to mean that “the Jordanian land and various listings are owned by the relator.” (Complaint at 4). Furthermore, relator asserts that the contents of the exhibit entitle her to land, oil wells, and a gold treasury as well. (Complaint at 4).

Relator petitions this court for a writ of mandamus to require the Hamilton County Clerk of Courts to provide her with a guaranteed loan of up to \$550,000 and to require the Clerk to grant her access to the Royal Order Edict book so that she may issue a Royal Order/Edict that would acknowledge Relator’s royalty and allow her to inherit the Jordanian land through inherited sovereignty. (Complaint at 5).

ARGUMENT

Proposition of Law I

In order for a writ of mandamus to be issued, the relator must prove that (1) the lower court is about to exercise judicial authority, (2) the exercise of authority is not authorized by law, and (3) the relator has no plain and adequate remedy in the ordinary course of the law.

The Supreme Court has original jurisdiction in mandamus under Section 2 of Article IV of the Ohio Constitution. A writ of mandamus is an extraordinary relief which is provided for in both Article IV of the Ohio Constitution and R.C. 2731.01. R.C. 2703.01 states, “Mandamus is a writ, issued in the name of the state to an inferior tribunal, a corporation, board, or person, commanding the performance of an act which the law specially enjoins as a duty resulting from an office, trust, or station.”

In *State ex rel. Ohio Civ. Serv. Employees Assn., AFSCME, Local 11, AFL-CIO v. State Emp. Relations Bd.*, 104 Ohio St.3d 122, 2004-Ohio-6363, 818 N.E.2d 688, ¶ 9, the Supreme Court of Ohio enumerated the requirements for a writ of mandamus stating that, “[t]o be entitled to a writ of mandamus, relators must show (1) that they have a clear legal right to the relief prayed for, (2) that respondents are under a clear legal duty to perform the acts, and (3) that relators have no plain and adequate remedy in the ordinary course of the law.” *State ex rel. National City Bank, v. Bd. of Education*, 52 Ohio St.2d 81, 84, 6 O.O.3d 288, 369 N.E.2d 1200 (1977). Relator has not demonstrated that she has a clear legal right to the relief requested. Relator has no clear legal right to be granted access to the Jordanian Royal Treasury Display.

Furthermore, even if Relator does have the legal right to the relief requested, the Clerk of Courts is not under a clear legal duty to perform the act requested. The duties and responsibilities of the Clerk of the Court of Common Pleas are enumerated in Chapter 2303 of the Revised Code. Nowhere in Chapter 2303 of the Revised Code, nor in any other applicable

statute, is the duty to provide access to the Jordanian Royal Treasury Display or any such exhibit included.

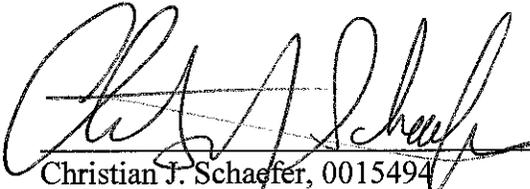
As Baldwin's claim fails to establish that she had a clear legal right to the relief requested or that the clerk had a clear legal duty to perform the requested act, both of which are required elements of a mandamus action, Baldwin cannot demonstrate that she is entitled to her requested recovery. Therefore, Relator is not entitled to a Writ of Mandamus, and dismissal is appropriate.

CONCLUSION

For the foregoing reasons, the Complaint for a Writ of Mandamus should be dismissed.

Respectfully submitted,

JOSEPH T. DETERS
PROSECUTING ATTORNEY
HAMILTON COUNTY, OHIO

A handwritten signature in black ink, appearing to read "Christian J. Schaefer", is written over a horizontal line.

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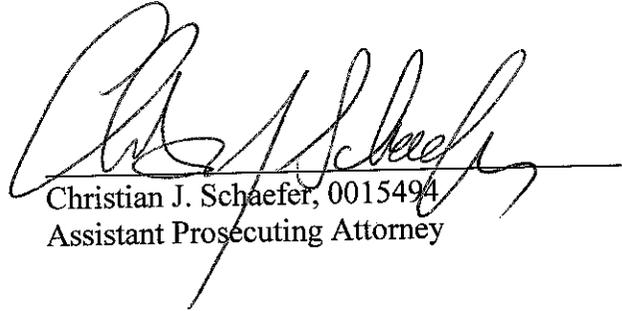
ATTORNEYS FOR RESPONDENT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by regular U.S. Mail this 5th day

of July, 2012 on:

Yvette Barbara Baldwin
8112 Constitution Drive
Cincinnati, Ohio 45215



Christian J. Schaefer, 0015494
Assistant Prosecuting Attorney