

ORIGINAL

IN THE SUPREME COURT OF OHIO

HANIF IBRAHIM,	)	Case No. 14-0251
	)	
Plaintiff-Appellant,	)	
	)	On Appeal from the Franklin County
v.	)	Court of Appeals, Tenth Appellate
	)	District Court of Appeals Case No.
SAKHI IBRAHIM, nka SAKHI	)	13 AP 681
SHAMSUDDEEN BEERU,	)	
	)	2013-Ohio-5401
Defendant-Appellee.	)	(Trial Court No. 12 DR 1670

\*\*\*\*\*  
 APPELLEE SAKHI IBRAHIM, nka SAKHI SHAMSUDDEEN BEERU'S  
 MEMORANDUM IN RESPONSE TO APPELLANT HANIF IBRAHIM'S  
 MEMORANDUM IN SUPPORT OF JURISDICTION  
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 child

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**I. STATEMENT OF APPELLEE'S POSITION AS TO WHETHER A  
SUBSTANTIAL CONSTITUTIONAL QUESTION IS INVOLVED OR  
WHETHER THIS CASE IS OF PUBLIC OR GREAT GENERAL INTEREST**

**A. Constitutional Question, or Lack Thereof**

Appellant raises no substantial constitutional question in his memorandum in support of jurisdiction. Although Appellant cites numerous cases for the proposition that the relationship between a child and a parent is constitutionally protected, appellant's premise that he has a constitutional right to the relief he seeks has no legal foundation, nor does he provide the court with one. Specifically, Appellant asks this court to prevent Appellee from travelling internationally with their son. This is not a constitutional question. **The issues presented are a matter of statute, specifically the allocation of parental rights and responsibilities pursuant to the best interest of the child as determined by the court pursuant to Ohio Revised Code 3109.04.** The parties were given, as one of their parental rights, the right to international travel. Appellant objects. It is that simple.

Ohio Revised Code 3109.04(F) lists the factors that a court must consider when determining the best interest of the child. The parties each were duly served, had notice and opportunity to be heard, and had a divorce trial. Judge Mason considered each of the statutory factors regarding the best interest of the child, and made findings, at length, regarding the best interest of the child in the parties' 7/11/13 Decree of Divorce.

There is a reason Appellant did not provide this court with any legal authority demonstrating that his constitutional rights are being violated – the authority does not exist. There is no constitutional right to have what he wants – a bright line rule allowing a parent to prevent international travel. The cases Appellant cites does not provide that

authority. The law Appellant cites (UCAPA) is not the law of Ohio. Even if it were, it would not provide the relief Appellant wants. There simply is no authority for what Appellant wants, he just wants it. Appellant had the benefit of due process. He did not get the ruling he wanted, and he wants a different ruling. That does NOT make what he wants a constitutional issue.

### **B. Public or Great General Interest**

At first glance, this case might appear to be a case of public interest or great general interest. After all, Appellant talks at great length about *kidnapping, abduction and the welfare of children*. Who would not be interested in those things? But upon closer examination, this case is not unique. Many parents divorce. Many children travel internationally, *especially when neither of their parents were born in this country*. Some parents disagree regarding whether this travel is appropriate. Parents that disagree bring the issue to the courts and the court assesses the evidence and the credibility of the parties and makes rulings regarding the best interest of the child. If matters regarding children go to trial, there will generally be one parent who is not happy with the decision, possibly both. That does not make the decision a matter of public interest or great general interest such that each trial court determination should be reviewed by this court.

Again, Appellant's assertion that this is a matter of public interest or great general interest relies upon the premise that *in his case*, if his child is allowed to travel internationally, it is the equivalent of sanctioning kidnapping. The trial court found, after hearing days of trial, that international travel was in I.I.'s best interest. That ruling is of great interest to the *Appellant*, but not to the public. Appellant has presented no authority or argument to this court that *his case* is a matter of public interest or great general

interest. There simply is no such issue to decide here, despite the fact that it is very important to Appellant.

## **II. STATEMENT OF FACTS**

The facts of this case are set out at length in the parties Decree of Divorce, filed with this court as an attachment to Appellant's Memorandum in Support of Jurisdiction.

The parties in this case, Defendant Appellee Sakhi Shamsuddeen Beeru , fka Sakhi Ibrahim and Plaintiff Appellant Hanif Ibrahim, were an international family. Appellant was born in Karachi, Pakistan, (Tr. 172, Line 22), has been in the United States for 15 years, and is now a U.S. citizen. Appellee was born in Dubai, United Arab Emirates. (Tr. 172, Lines 17-20). She is a citizen of India (Tr. 316, Line 24 through 317, Line 3. Most of the parties' relatives live outside of the United States. (Tr. 172, Line 23 through Tr. 173, Line 5).

The parties met on an international matrimonial web site for arranged marriages in October, 2010. (Tr. 167, Lines 7-19). At the time the parties met, Appellee had completed medical school and was doing her residency in obstetric and gynecology in Germany. (Tr. 171, Lines 7-14). The parties married in Dubai, UAE on March 31, 2011. (Tr. 169, Lines 4-9) and returned to Appellant's home in the Ohio.

The parties had marital troubles from the beginning, especially when Appellee became pregnant. (Tr. 174, Lines 1-4), Appellant was very controlling. When he came home, he literally wanted her in the kitchen or the bedroom, not in the hallway, and not sitting down on the couch next to him watching television. (Tr. 174 , 21-25). She was not to leave the house unless a neighbor came to take her out. (Tr. 175, Lines 5-7). There were periods of time when he cut off the internet, landline and television. (Tr. 17, Lines

1-4). There were times while she was pregnant that the house had little or no groceries, and Appellant would go out to eat but not bring anything home for Appellee. (Tr. 176, Lines 13-21). He controlled every single moment of his wife's day (telephone, internet, phones, car keys, where she went, etc; (Tr. 134, Line 6 through Tr. 135, Line 21). He refused to allow his wife to take birthing classes while she was pregnant (Tr. 323, Lines 2-4). He abused his wife while she was pregnant (Tr. 179, Line 22 through Tr. 182, Line 15). He repeatedly threw his wife out of the house in a strange country while she was pregnant, without giving her any identification to take with her (Tr. 182 Lines 8-15, Tr. 227, Lines 1-21). At one point, after hitting her and throwing her on the bed, he took all of her identification, eventually shredding some of it, including her green card. (Tr. 177, Lines 7- Tr. 178, Line 4).

One abuse incident involved his anger about Appellee's father not giving him the money he wanted. (Tr. 179, Line 24, through Tr. 181, Line 1). Over the course of the parties' marriage, Appellee's father contributed \$20,000 to the couple, and Appellant kept all but \$300 of it for himself. (Tr. 321, Lines 7-19). Needless to say, the marriage deteriorated quickly.

Earlier in Appellee's pregnancy, she approached Appellant about the cultural tradition (not religious practice, cultural tradition) called "Confinement". Appellee testified at trial that Confinement is a tradition whereby during the time period from the seventh month of pregnancy until 40 days after birth, the pregnant woman goes to her family's house and is cared for by her family, including specialized postnatal care for the mother and the child. However, instead of going to her parents' home in Dubai for this,

her parents came to Ohio and rented an apartment for this period. (Tr. 225, Line 18 – Tr. 226, Line 24.)

On February 25, 2012, Appellee asked Appellant for her identification, in case she should go into labor while he was working in Mansfield. Appellant began screaming, and called Appellee's father, and told him that he (Appellant) was going to leave the house, and when he comes back Appellee had better not be there. That is the day Appellee left Appellant's house for good and the parties separated. (Tr. 226, Line 25 through Tr. 227, Line 24). Appellee went to stay with her parents in the apartment they were renting, and Appellant knew where she was staying. (Tr. 228, Lines 1-5).

Although the parties were separated, there were some attempts at reconciliation and contact between the families. The parties had an anniversary celebration. (Tr. 229, Line 5). Appellant brought business plans to Appellee's father, asking for investments, but lost interest when her father said that any business her father invested in would have to be partly owned by Appellee. (Tr. 228, Lines 11-24).

The parties' child, I.I., was born on April 3, 2012, a few days after the parties celebrated their anniversary. At some point, Appellant agreed to let Appellee finish her confinement in Dubai, and they were discussing a visit to India, either Appellant alone or both Appellee and Appellant, to visit his grandmother, (Tr. 229 Line 24 – Tr. 230, Line 13) and to allow Appellant's grandmother to bless I.I. (Tr. 232, Lines 3-4). After I.I.'s birth, at the hospital, Appellant became quite upset when Appellee used the name Sakhi Shamsuddeen Beeru, the name on her green card and passport, for I.I.'s birth certificate. (Tr. 230, Line 16 through Tr. 232, Line 9). Appellee testified that as the parties were all, (including Appellant), planning to travel abroad, it was important that her name on the

baby's birth certificate match her name on all of her other identification. (Tr. 230, Lines 23-25). Appellant was screaming at the hospital, and in the days following I.I.'s birth, he would periodically come to her parents' house screaming and yelling, but other times he would be calm. (Tr. 231, Line 4 through Tr. 232, Line 21).

At one point, Appellant became enraged with Appellee, and kept saying to his mother that he will come back in the evening and "show them". Appellant had a gun, and Appellee was afraid of what he would do, so she sought and obtained a civil protection order. (Tr. 233, Line 22 through Tr. 235, Line 12.)

After I.I. was born, but before Appellee filed for a Civil Protection Order and Appellant filed for Legal Separation, Appellant continued to ask Appellee's father for outrageous sums of money. (Tr. 232, Lines 22 through Tr. 233, Line 3). Appellant filed a Complaint for Legal Separation on April 17, 2012. He sought and obtained the *standard* restraining order Franklin County grants in legal separation and divorce cases. Appellee later sought and received the same restraining order. Appellee counterclaimed for divorce, and Appellant amended his Complaint to be a complaint for divorce. Although his original Complaint for Legal Separation included a request for shared parenting, his amended complaint for divorce did not. Neither Appellant nor any of the three attorneys he hired and fired before the divorce trial ever filed a shared parenting plan.

On June 14, 2012, the parties entered into an Agreed Order Regarding Beneficial Use, Restraining Order, and Temporary Visitation Order. This order put on additional restraining orders that were sufficient to allow Appellee to dismiss the civil protection order case, and gave the parties visitation orders to follow until the trial court could enter

temporary orders pursuant to Civil Rule 75(N). This order was an interim order only and is in no way, shape or form a shared parenting plan, although Appellant claims that it is.

Appellant's Statement of Facts would have this court believe he had a "real fear" that Appellee would abscond with I.I.. At trial he referred to it vaguely as "the threat", but trying to get him to say what that threat was at trial actually was proved fruitless: Tr. 10, Lines 24, 25, Tr. 60, Lines 14-20, Tr. 83, Lines 13-23, Tr. 84, Line 1 – Tr. 85, Line 7, See Tr. 87, Line 4 through Tr. 88, Line 22, Tr. 90, Lines 12-13.

Appellant's Statement of Facts, suggests to this court that Appellee remained focused on permanently relocating with I.I. However, Appellee did not ask for it in her pretrial statement, she did not ask for it at trial, and she did not ask for it in her closing arguments. Surely, if she were still pursuing that goal she would have mentioned it in all three of those places, and she would have appealed the trial court's decision which placed restrictions on international travel.

On February 27, 2013, the parties began a multi-day trial at which Appellee and Appellant testified, and no other witnesses testified. The trial court entered a Judgment Entry – Decree of Divorce on July 11, 2013, ordering, among other things, an award of sole custody of I.I. to Appellee, allowing reasonable international travel to both parties with I.I., and making two pages of orders regarding the conditions of international travel. Appellant has appealed the Trial Court's Decree of Divorce.

### **III. ARGUMENT IN SUPPORT OF APPELLEE'S POSITION**

Appellant, has presented this Court, as he did to the Tenth District Court of Appeals, with a version of events that are simply not supported by the trial record and the Decree of Divorce. His story remains the same as it was in a 60(B) Motion, in the Court

of Appeals, in a Motion for Reconsideration in the Court of Appeals, and now in the Supreme Court. His problem is, and still remains – *he was not credible during his trial and the Appellee was*. Appellant, however, attempts to use smoke and mirrors to try to divert the Court’s attention away from the facts of HIS case, and toward the plight of international abduction cases. This is a constant in Appellant’s arguments, and this is because the factual findings of the Trial Court are not favorable whatsoever for Appellant. So, Appellant shops for a Court that will rewrite the factual findings in his divorce case and give him what he wants. At some point, given Appellant’s conduct as detailed in the Divorce Decree, Appellant’s objections to international travel begin to look less about the best interest of the child and more about control.

Appellant’s claims are built upon a shaky ladder of fallacies standing squarely in the middle of a field of quicksand. In order to give him the relief he wants, this court would have to:

1. Substitute its own judgment for that of the finder of fact in a custody case regarding, among other relevant factors, the credibility of the parties, when competent, credible evidence exists to support the trial court’s findings; AND
2. Substitute its own judgment for that of the finder of fact regarding the best interest of the child; AND
3. Accept Appellant’s premise that to allow I.I. any international travel with Appellee is the legal equivalent of depriving him of any future contact with his child; AND

4. Accept Appellant's premise that he has a constitutional right to prevent his child from traveling abroad if he does not want the child to travel abroad, even for a visit, despite Appellant's complete lack of authority supporting this premise; AND

5. Ratify Appellant's reliance upon a law not adopted in the state of Ohio (UCAPA)<sup>1</sup>; AND

6. Adopt a bright line rule that children may not travel to non-Hague countries against their parents wishes.

Without accepting each of these premises and taking ALL of these actions, this court cannot accept Appellant's arguments for the relief he wants. The ladder Appellant uses to try to climb to the relief he wants is rickety at best, and each of the rungs fails to support the weight of Appellant's claims.

**A. Factual Findings and Orders of the Trial Court and the Appellate Court**

The Divorce Decree *repeatedly* found the appellant to be non-credible and evasive in his testimony. Decree of Divorce p. 12, 18. The Divorce Decree found that Appellee is the party most likely to obey the court's orders (7/11/13 Decree of Divorce), and proceeds to list a litany of examples where the Appellant has disobeyed the court's orders in ways that this court might find unconscionable.

The Divorce Decree found:

- "Defendant Mother provided credible testimony regarding her intent to remain in the United States, acknowledged [REDACTED] need for a relationship with his Father, and outlined her plan for supporting herself here. These plans include joining a medical transcriptionist class, and ultimately completing her residency to become a medical doctor. She also testified with respect to cultural groups, play groups, and parenting groups that she has participated in order to establish a

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<sup>1</sup> The Uniform Law Commission has a website which shows what states UCAPA is adopted in. Ohio is not one of them. See <http://www.uniformlaws.org/Act.aspx?title=Child+Abduction+Prevention>

support system and further integrate herself and ██████████ into the community; (7/11/13 Decree of Divorce pgs. 15,16 )”

- “No credible evidence was presented that Defendant Mother is a flight risk or that reasonable international travel with the minor child should not be permitted (7/11/13 Decree of Divorce p. 16)”
- “The Court finds Defendant Mother’s testimony to be credible. (7/11/13 Decree of Divorce p. 16)”
- “He also testified that there has been an abduction threat, but he failed to present any evidence to support this perception. In fact, Father was often evasive and not credible during much of his testimony.” (7/11/13 Decree of Divorce p. 18).

The allegations of abduction that Appellant makes are simply not supported by the facts presented at trial. The fact that his assertions do not correspond with the findings in the Divorce Decree did not go unnoticed by the 10<sup>th</sup> District Court of Appeals, which affirmed the Judgment of the Trial Court:

“Turning to the individual assignments of error, the facts alleged in the assignment of error do not correspond with the provisions of the decree set forth above.”

*Ibrahim v. Ibrahim*, 2013-Ohio-5401, (Ohio Ct. App., Franklin County Dec. 5, 2013)

Appellant would have this court believe that if Appellee is allowed to visit any country which is not a signatory to the Convention of 25 October 1980 on the Civil Aspects of International Child Abduction (hereafter “Hague Convention”), he will lose his child forever. Nowhere does Appellant present any authority to support his proposition, other than an argument for a reviewing court to reinterpret the facts, and naked castings into the constitutional sea. The Tenth District Court of Appeals, in affirming Judge Mason’s decision held:

[\*P10] The trial court heard the actual testimony from Sakhi and found her credible. Based upon the testimony presented in open court, the trial court judge concluded that Sakhi was not going to flee the country with

the child. The trial court judge also concluded that Sakhi believed that Hanif should be involved in raising the child.

[\*P11] We are not in a position to overturn that set of factual findings by the trial court judge. Given those factual findings, Hanif will not lose access to the child.

### **B. Legal Analysis**

The test for determining if a parent's request of an ex-spouse to cooperate in obtaining a passport for their minor child is **whether or not it is in the best interest of the child**. *Van Osdell v. Van Osdell*, 12th Dist. No. CA2007-10-123, 2008 Ohio 5843, at ¶16. "\*\*\* [T]he court may take into consideration many factors when addressing the child's best interest \*\*\* [which] include balancing the risks inherent in international travel versus any benefit the child would incur from vacationing abroad." *Id.* at ¶15. *Muscarella v. Muscarella*, 2011-Ohio-1159, ¶18 (Ohio Ct. App., Trumbull County Mar. 11, 2011):

Divorce and ancillary custody actions are purely matters of statute. *Shively v. Shively*, 10<sup>th</sup> Dist. No. 94APF02-249 (Sept. 22, 1994), citing *State ex rel Papp. v. James*, 69 Ohio St.3d 373, 379 (1994). In such actions, domestic relations courts have jurisdiction, as statute confers and limits it, to allocate parental rights and responsibilities for the care, custody, and control of a child. *Id.*; In reviewing statutes, we are obligated "to give effect to the words used and not to insert words not used." *In re James*, 113 Ohio St. 3d 420, 2007-Ohio-2355, ¶13.

Ohio Revised Code 3109.04(F) lists the factors that a court must consider when determining the best interest of the child. The parties each were duly served, had notice and opportunity to be heard, and had a divorce trial. Judge Mason considered each of

the statutory factors regarding the best interest of the child, and made findings, at length, regarding the best interest of the child in the parties' 7/11/13 Decree of Divorce.

A reviewing court should give deference to a trial court's findings in custody matters.

"The discretion which a trial court enjoys in custody matters should be accorded the utmost respect, given the nature of the proceeding and the impact the court's determination will have on the lives of the parties concerned. The knowledge a trial court gains through observing the witnesses and the parties in a custody proceeding cannot be conveyed to a reviewing court by a printed record. *Trickey v. Trickey* (1952), 158 Ohio St. 9, 13, 47 O.O. 481, 483, 106 N.E. 2d 772, 774. In this regard, <sup>HN4</sup>the reviewing court in such proceedings should be guided by the presumption that the trial court's findings were indeed correct. See *Seasons Coal Co. v. Cleveland* (1984), 10 Ohio St. 3d 77, 80, 10 OBR 408, 410, 461 N.E. 2d 1273, 1276."

*Miller v. Miller*, 37 Ohio St. 3d 71, 74 (Ohio 1988)

The standard for abuse of discretion was laid out in the leading case of *C.E. Morris Co. v. Foley Constr. Co.* (1978), 54 Ohio St. 2d 279, 8 Ohio Op. 3d 261, 376 N.E.2d 578, but applied to custody cases in *Bechtol v. Bechtol* (1990), 49 Ohio St. 3d 21, 550 N.E.2d 178, syllabus:

Where an award of custody is supported by a substantial amount of credible and competent evidence, such an award will not be reversed as being against the weight of the evidence by a reviewing court. (*Trickey v. Trickey* [1952], 158 Ohio St. 9, 47 Ohio Op. 481, 106 N.E.2d 772, approved and followed.)"

The reason for this standard of review is that the trial judge has the best opportunity to view the demeanor, attitude, and credibility of each witness, something that does not translate well on the written page. As we stated in *Seasons Coal Co. v. Cleveland* (1984), 10 Ohio St. 3d 77, 80-81, 10 Ohio B. Rep. 408, 410-412, 461 N.E.2d 1273, 1276-1277:

"The underlying rationale of giving deference to the findings of the trial court rests with the knowledge that the trial judge is best able to view the witnesses and observe their demeanor, gestures and voice inflections, and use these observations in weighing the credibility of the

proffered testimony.

A reviewing court should not reverse a decision simply because it holds a different opinion concerning the credibility of the witnesses and evidence submitted before the trial court. A finding of an error in law is a legitimate ground for reversal, but a difference of opinion on credibility of witnesses and evidence is not. The determination of credibility of testimony and evidence must not be encroached upon by a reviewing tribunal, especially to the extent where the appellate court relies on unchallenged, excluded evidence in order to justify its reversal."

This is even more crucial in a child custody case, where there may be much evident in the parties' demeanor and attitude that does not translate to the record well.

*Davis v. Flickinger*, 77 Ohio St. 3d 415, 418-419 (Ohio 1997).

Appellant's reliance on a law that is not enacted in Ohio (UCAPA) is misplaced. In reviewing statutes, we are obligated "to give effect to the words used and not to insert words not used." *In re James*, 113 Ohio St. 3d 420, 2007-Ohio-2355, ¶13. However, per *Muscarella*, "[T]he court may take into consideration many factors when addressing the child's best interest \*\*\* [which] include balancing the risks inherent in international travel versus any benefit the child would incur from vacationing abroad." *Id.* at ¶15. *Muscarella v. Muscarella*, 2011-Ohio-1159, ¶18 (Ohio Ct. App., Trumbull County Mar. 11, 2011). The fact that the court placed any restrictions on international travel demonstrates that the trial court did indeed consider the risks, and made orders the court found to be in the best interest of the child.

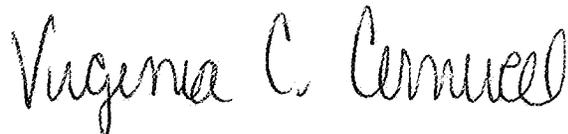
### **C. Conclusion**

Appellant has had notice and opportunity for a hearing, several hearings in fact, regarding his rights, including his constitutional rights. A chain of citations to cases that mention a right to have a family, right to association with his child, right to care, custody

and control of his child, etc. DO NOT give Appellant a constitutional right to the relief he wants. Appellant has demonstrated no substantial constitutional questions. Under Ohio law, absent an abuse of discretion, where competent, credible evidence exists to support the trial court's findings, Appellant may not take the judgment of the Trial Court out of the equation when he does not like the Court's findings. Appellant has demonstrated no abuse of discretion, he simply seeks a reinterpretation of the Trial Court's findings that would allow him to seek different orders. As such, Appellant's request to have his case heard by this court on the basis that a substantial constitutional questions exists should be DENIED.

Appellant's assertion that this is a matter of public interest or great general interest relies upon the premise that *in his case*, if his child is allowed to travel internationally, it is the equivalent of sanctioning kidnapping. The trial court found, after hearing days of trial, that international travel was in I.I.'s best interest. That ruling is of great interest to the *Appellant*, but not to the public. As such, Appellant's request to have his case heard by this court on the basis of public interest or great general interest should be DENIED.

Respectfully Submitted,



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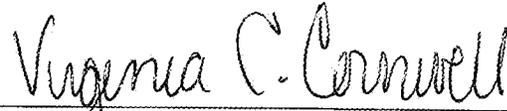
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CERTIFICATE OF SERVICE

I hereby certify that on the 14 day of March, 2014, a true and accurate copy was served upon the following attorneys by e-mail.

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