

ORIGINAL

SUPREME COURT OF OHIO

THE STATE OF OHIO ex rel. :
 DOUGLAS C. BARTON :
 Relator, Pro Se :
 437 Warwick Place :
 Fairborn, OH 45324 :
 Relators, :
 vs. :
 KEESHA A. BARTON :
 and :
 TIMOTHY CAMPBELL :
 (Personal & Professional Capacity) :
 and :
 STEPHEN HURLEY :
 (Personal & Professional Capacity) :
 and :
 Greene County Domestic Relations Court, :
 et. al. :
 and :
 Charles Slicer :
 and :
 David McNamee :
 and :
 Ohio 2nd District Court of Appeals :
 Respondents, :

Supreme Court Case No:
 2014-2241
 Case No. 2013-DR-0207
 Court of Appeals No. 2014-CA-0046
 Case No. 2013-DV-0193
 Court of Appeals No. 2014-CA-0021

**OPPOSITION TO MOTION(S)
 TO DISMISS**

“[A] pro se petitioner’s pleadings should be liberally construed to do substantial justice.”

United States v. Garth, 188 F.3d 99, 108 (3d Cir. 1999).

“The assertion of federal rights, when plainly and reasonably made, are not to be defeated under the name of local practice.” *Davis v. Wechler*, 263 U.S. 22, 24; *Stomberg v.*

California, 283 U.S. 359; *NAACP v. Alabama*, 375 U.S. 449.

RECEIVED
 FEB 02 2015
 O-MB
 CLERK OF COURT
 SUPREME COURT OF OHIO

FILED
 FEB 02 2015
 CLERK OF COURT
 SUPREME COURT OF OHIO

**“The claim and exercise of a Constitutional right cannot be converted into a crime” ...
“a denial of them would be a denial of due process of law”. *Simmons v. United States*, 390
U.S. 377 (1968)**

RELATOR’S OBJECTION TO MOTION(S) TO DISMISS

For the Respondent(s) Keesha Barton, Timothy Campbell, and Charles Slicer see attached AFFIDAVIDT(s) of FELONY WARRANT of ARREST. There is more than ample probable cause, and sufficient evidence (Trial Court Records) to support probable cause.

For the Respondent Stephen Hurley see attached AFFIDAVIDT of MISDEMANOR WARRANT of ARREST. There is more than ample probably cause, and sufficient evidence (Trial Court Records) to support probable cause.

For the Respondent David McNamee as follows. While there may be a means to file complaints against Attorney’s or Judges it is completely useless. As evidenced by original filing documents (Relator Exhibit B). The Disciplinary process has no authority to actually correct any misconduct as it relates directly to a given case. The “process” is also conducted in private, and not on the record. Respondent McNamee may have a bigger part in the fraud, that may be uncovered through discovery process. Respondent McNamee has direct responsibility for discovery abuses that resulted in a negative outcome by trial court which by probable cause is sufficient to include him as a direct respondent. There is evidence of this that can and will be produced. See *Davis v. Wechler* as quoted in opening.

For the Respondent Greene County Domestic Relations Court. The trial court has control over and through repeated pattern of racketeering and extortion. The trial court order is forced extortion and coercion, any failure to pay the amount potentially results in further pain and suffering unless you pay your way out. The very design of the domestic relations structure and "system" is to extort as much money out of the parties as possible to the enrichment of the Judge's, Magistrates, Court Staff, Attorney's and related support staff. RICO stands for Racketeer Influenced and *Corrupt* Organizations Act (emphasis added), the GCDRC is very clearly corrupt and has no interest in fairness and justice. If the purpose is to reduce the States expenses, why is the payment for transcripts made to an individual and not the State? Extortion is generally defined as the gaining of property or money by almost any kind of force, or threat of 1) violence, 2) property damage, 3) harm to reputation, or **4) unfavorable government action.** (emphasis added) While usually viewed as a form of theft/larceny, extortion differs from robbery in that the threat in question does not pose an imminent physical danger to the victim.

For the Respondent Second District Court of Appeals. Is currently committing civil rights violations in Case #2014-CA-0046, failed to properly consider a motion of DEMAND and DETERMINATION OF VOID JUDGEMENT, they struck APPELLANT BRIEF (Appellant did follow procedures) but the brief was "too long" and too many errors of assignment. APPELLANT BRIEF was filed before the 35 page limit, which is insufficient to represent 49 ERRORS. APPELLEE Attorney's files a motion, it's a guaranteed he is going to get whatever he requests, EQUAL BEFORE THE LAW? I think not. Relator has one more motion before them (RECONSIDERATION), before appealing their decisions to this Court. I will state it here, I WILL NOT REFORMAT MY BRIEF. My civil rights will not be defeated by "local" procedure.

This boils down to what's right and wrong. Relator did not get to final judgment and all of a sudden start complaining about Civil Rights Violations. Relator's initial complaint was on 4 December 2013, which was about 10 months prior to final judgment. The level of corruption is unbelievable, and the complete disregard for Constitutional Rights is unacceptable. Though I am entitled to these rights by birth as guaranteed by the U.S. Constitution, I have spent the majority of my adult life supporting and defending the U.S. Constitution, in that context I have "earned" those rights, not only for myself but for others. Relator will accept nothing less than full compliance with the Constitution, these "rights" are not at the whim or discretion of any judge or court. Ask yourself how many others? How many other people are being abused by Domestic Relations Courts in Ohio?

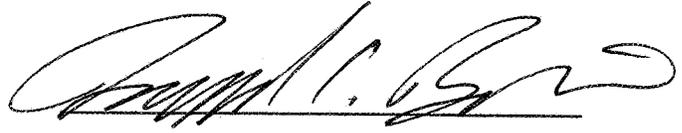
See Relator's Exhibit "G" that clearly shows Respondent KAB was not covered by Relator's Insurance. This was testified to on 11 Aug 2014. Clear and convincing evidence of Judicial incompetence, bias and prejudice.

See also Relator's Exhibit "H" Compact disc with two audio files. File names: (1) McNamee 05_27_14 Audio.wav (2) Slicer 05_30_14 Audio.wav.

Fraudulent Transfer leads to Punitive Damages and Attorney's Fees to six times the amount. *Renbolt v. Kern*, 2013 Ohio 1359

As for the DV CASE #2014-CA-0021, yes it was REVERSED. That should be another indicator to this Court that supports Relator's statements. Relator DCB NEVER WAIVED ANY RIGHTS, SPECIFICALLY THE RIGHT TO A JURY TRIAL.

Respectfully submitted,



DOUGLAS C. BARTON,
RELATOR, PRO SE
437 WARWICK PLACE
FAIRBORN, OH 45324
513-508-7515

AFFIDAVIT

I, DOUGLAS C. BARTON, Relator herein, swear or affirm that I have read this document and, to the best of my knowledge and belief, the facts and information stated in this document are true, accurate and complete. I understand that if I do not tell the truth, I may be subject to penalties for perjury.



DOUGLAS C. BARTON

Sworn before me and signed in my presence this day 29 of Jan, 20 15.



Notary Public

My Commission Expires:

June 24, 2019



Sun Keating
Notary Public, State of Ohio
My Commission Expires 06-24-2019



USAA Federal Savings Bank
Collateral Processing Center
PO Box 25145
Lehigh Valley PA 18002-5145

4/19/2014

VIN: 4EZT8272238064777
Year: 2005
Make: SPORTSMEN
Owner: DOUGLAS BARTON

To Whom It May Concern,

The registered owner of the above referenced collateral has requested a name change. USAA Federal Savings Bank has no objection to changing the registered DOUGLAS BARTON to DOUGLAS BARTON and KEESHA BARTON. It is important that USAA Federal Savings Bank is recorded as the lienholder on the new title. Our lien should be as follows:

USAA Federal Savings Bank
PO Box 25145
Lehigh Valley PA 18002-5145

The title should be mailed to us at the address referenced above or sent electronically, if applicable. Below please find a list of USAA's state lien codes:

State	Lien Code	State	Lien Code	State	Lien Code
AL	71-00116-00	MA	C/23831	PA	31407426901
AZ	E00150962	MS	90004628000	TN	10950
CA	P12	MI	74-6393739	TX	74639373900
FL	201882743	NE	40583765	VA	FM27USAELT70
GA	001100305127	NH	102	WA	USA
IA	74-6393739	NJ	930-338761-938660	WI	10081
ID	74-6393739	NY	43480		
LA	ESUA	OR	0049184		

Thank you for your time and cooperation with this matter. Please contact us with any questions at usaa@mail@vintek.com or by calling 895.233.4415. Our business hours are Monday through Friday from 7:00am to 6:00pm CT. We value your business and thank you for trusting USAA with your financial needs.

Sincerely,

VIntek Collateral Management
Authorized collateral agent for USAA Federal Savings Bank

RELATOR
EXHIBIT "E"

NON-NEGOTIABLE - FOR REGISTRATION ONLY

ISSUING CNTY GREENE
RESIDENT CNTY GREENE

STATE OF OHIO No. 29 0129 2896
MEMORANDUM TITLE

ISSUE DATE
06/09/2014

IDENTIFICATION NUMBER
4EZTS27225S084777

YEAR MAKE MAKE DESCRIPTION
2005 --- KZ

COMMENTS
LIEN REPLACEMENT.

PURCHASE PRICE BODY TYPE MODEL MODEL DESCRIPTION
\$11,700.00 TT SPO

CONVERSION

TAX MILEAGE EVIDENCE
\$760.50 NO ODOM OH 2901292894
MLG BRAND

BRAND(S)

OWNER
DOUGLAS BARTON

437 WARWICK PL
FAIRBORN, OH 45324

PREVIOUS OWNER
JIM D. LOUGHRY
& JILL A. LOUGHRY
6800 CASTLEWOOD RD
CARROLL, OH 43112

FIRST LIENHOLDER DATE OF LIEN: 06/07/2013
USAA FEDERAL SAVINGS BANK

PO BOX 25145
LEHIGH VALLEY, PA 18002

WITNESS MY HAND AND OFFICIAL SEAL THIS 9th DAY OF JUNE, 2014

% 112842121



JRICKS
JBOND

RELATOR
EXHIBIT "F"

Statement Date: August 8, 2013



A000230
DOUGLAS C. BARTON
437 WARWICK PLACE
FAIRBORN OH 45324

PRIOR TO
DIVORCE BEING
FILED.

Your Benefits Resources™
<http://resources.hewitt.com/jci>

Johnson Controls Service Center
1-866-496-1999
8 a.m. to 4 p.m., Central time, Monday
through Friday.

Welfare Plan Enrollment Worksheet

Instructions

This worksheet provides information about your benefit choices. If you plan to keep the assigned coverage shown, you don't need to enroll.

If you don't enroll by **September 8, 2013**, you'll receive the coverage below.

Access Your Benefits Resources™ or call the Johnson Controls Service Center by **September 8, 2013** if you want to:

- Change your benefits below.
- Decline coverage.
- View your current coverage.

Your Current Coverage

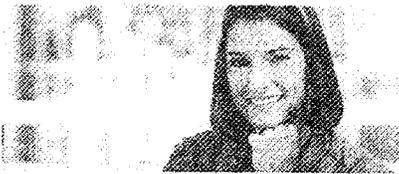
	Pay Period Price
<ul style="list-style-type: none"> ● Medical Option 31--BCBSIL PPO Plus Coverage Category 3--You + Child(ren) 	<input type="text"/>

Document Control #

RELATOR
EXHIBIT "G"



For More Information



Web: Your Benefits Resources™ at <http://resources.hewitt.com/jci>
Phone: 1-866-496-1999, 8 a.m. to 4 p.m., Central time, Monday through Friday.

Family Information

Below is the information on file for you and your dependents. To protect your privacy, Social Security numbers are not shown. Please review this information. If you need to add dependents, make changes, or verify information, take note of the information needed and access the *Your Benefits Resources™* at <http://resources.hewitt.com/jci> or call the Johnson Controls Service Center at 1-866-496-1999.

• Person Information

	You	Dependent No. 1	Dependent No. 3
Name	DOUGLAS C. BARTON	AIMEE F. BARTON	Keesha A. Barton
Gender	Male	Female	Female
Relationship	--	Child	Spouse
Disabled Dependent	--		

• Coverage Information

	You	Dependent No. 1	Dependent No. 3
Medical	Yes	Yes	No
Dental	Yes	Yes	No
Vision	Yes	Yes	No

VERY CLEAR
THERE WAS NO
COVERAGE.

RELATOR TESTIFIED TO THIS ON 11 AUG 2014.
THE FINDING OF CONTEMPT IS JUDICIAL
INCOMPETENCE AND PREJUDICE.

Document Control #

309700023 01141-A000230

RELATOR
EXHIBIT "G"

SUPREME COURT OF OHIO

THE STATE OF OHIO ex rel.	:	
DOUGLAS C. BARTON	:	
Relator, Pro Se	:	Supreme Court Case No:
437 Warwick Place	:	
Fairborn, OH 45324	:	2014-2241
Relators,	:	
vs.	:	
KEESHA A. BARTON, et al.,	:	
Respondents,	:	Case No. 2013-DR-0207
	:	Court of Appeals No. 2014-CA-0046
	:	
	:	Case No. 2013-DV-0193
	:	Court of Appeals No. 2014-CA-0021
	:	
	:	AFFIDAVIT OF ARREST
	:	KEESHA A. BARTON

AFFIDAVIT OF ARREST for KEESHA A. BARTON

Pursuant to O.R.C. 2935.09 & 2935.10 this Affidavit of Arrest is submitted for Official Review.

O.R.C. 2913.02 Theft. (B)(3) or spouse of an active duty service member, division (B)(3) of this section applies. Felony of Third Degree.

O.R.C. 2913.43 Securing writings by deception. (B)(3) or spouse of an active duty service member, division (B)(3) of this section applies. Felony of Third Degree.

O.R.C. 2913.05 Telecommunications Fraud. Felony of Third Degree.

The Respondent Keesha A. Barton on or about 10 April 2014 did knowingly contact USAA (San Antonio, TX) through electronic means (cellular or electronic mail) and cause the subsequent letter (see Exhibit E). Respondent KAB then used letter to defraud, misrepresent and encumber the motor vehicle of Relator Douglas C. Barton to the Greene County Clerk of

Courts Title Division. The Respondent KAB then misrepresented to trial court on 6 June 2014, alleging Contempt of Court on basis of fraudulent documents. Respondent KAB presented the fraudulent title through her counsel Charles Slicer. Relator DCB upon further investigation discovered the means of fraud, and presented these facts to the GCCC Title Division. The GCCC Title Division within minutes canceled the fraudulent title, re-issued previous title #29 0129 2896 (see Exhibit F). During the subsequent court dates (18 July 2014, 11 Aug 2014) Relator DCB complained to the trial court on record about the fraudulent title.

REVIEWING OFFICIAL
SUPREME COURT OF OHIO

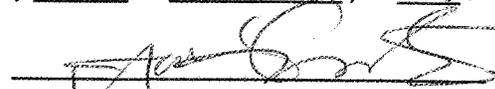
AFFIDAVIT

I, **DOUGLAS C. BARTON**, Relator herein, swear or affirm that I have read this document and, to the best of my knowledge and belief, the facts and information stated in this document are true, accurate and complete. I understand that if I do not tell the truth, I may be subject to penalties for perjury.



DOUGLAS C. BARTON
RELATOR, PRO SE
437 WARWICK PLACE
FAIRBORN, OH 45324
513-508-7515

Sworn before me and signed in my presence this day 29 of Jan, 20 15.



Notary Public
My Commission Expires:
June 24, 2019



Sun Keating
Notary Public, State of Ohio
My Commission Expires 06-24-2019

SUPREME COURT OF OHIO

THE STATE OF OHIO ex rel.	:	
DOUGLAS C. BARTON	:	
Relator, Pro Se	:	Supreme Court Case No:
437 Warwick Place	:	
Fairborn, OH 45324	:	2014-2241
Relators,	:	
vs.	:	
KEESHA A. BARTON, et al.,	:	
Respondents,	:	Case No. 2013-DR-0207
	:	Court of Appeals No. 2014-CA-0046
	:	
	:	Case No. 2013-DV-0193
	:	Court of Appeals No. 2014-CA-0021
	:	
	:	AFFIDAVIT OF ARREST
	:	TIMOTHY CAMPBELL

AFFIDAVIT OF ARREST for TIMOTHY CAMPBELL

Pursuant to O.R.C. 2935.09 & 2935.10 this Affidavit of Arrest is submitted for Official Review.

O.R.C. 2921.32 Obstructing Justice. Felony of Third Degree.

O.R.C. 2921.45 Interfering with civil rights. Misdemeanor of First Degree

The Respondent Timothy Campbell on 18 July 2014, 11 Aug 2014 and 12 Sep 2014 did materially assist Keesha A. Barton in the commission of crimes (O.R.C. 2913.02 Theft (B)(3), O.R.C. 2913.43 Securing writing by deception (B)(3), and O.R.C. 2913.05 Telecommunications Fraud. The Respondent Keesha A. Barton on or about 10 April 2014 did knowingly contact USAA (San Antonio, TX) through electronic means (cellular or electronic mail) and cause the subsequent letter (see Exhibit E). Respondent KAB then used letter to defraud, misrepresent and encumber the motor vehicle of Relator Douglas C. Barton to the Greene County Clerk of

Courts Title Division. The Respondent KAB then misrepresented to trial court on 6 June 2014, alleging Contempt of Court on basis of fraudulent documents. Respondent KAB presented the fraudulent title through her counsel Charles Slicer. Relator DCB upon further investigation discovered the means of fraud, and presented these facts to the GCCC Title Division. The GCCC Title Division within minutes canceled the fraudulent title, re-issued previous title #29 0129 2896 (see Exhibit F). During the subsequent court dates (18 July 2014, 11 Aug 2014) Relator DCB complained to the trial court on record about the fraudulent title.

The Respondent Timothy Campbell under color of his office knowingly deprived the Relator of his constitutional and statutory rights on 14 April 2014 and 30 April 2014. The Respondent Timothy Campbell's pre-determined decision was REVERSED on appeal, opinion stated was "not supported by evidence". Respondent Timothy Campbell's failure to immediately dismiss the ex-parte order that violated the Relator DCB's civil rights (failed to grant hearing within 10 days) further supports the interference of civil rights.

REVIEWING OFFICIAL
SUPREME COURT OF OHIO

AFFIDAVIT

I, **DOUGLAS C. BARTON**, Relator herein, swear or affirm that I have read this document and, to the best of my knowledge and belief, the facts and information stated in this document are true, accurate and complete. I understand that if I do not tell the truth, I may be subject to penalties for perjury.



DOUGLAS C. BARTON
RELATOR, PRO SE
437 WARWICK PLACE
FAIRBORN, OH 45324
513-508-7515

Sworn before me and signed in my presence this day 29 of Jan, 2015.



Notary Public

My Commission Expires:

June 24, 2019



Sun Keating
Notary Public, State of Ohio
My Commission Expires 06-24-2019

SUPREME COURT OF OHIO

THE STATE OF OHIO ex rel.	:	
DOUGLAS C. BARTON	:	
Relator, Pro Se	:	Supreme Court Case No:
437 Warwick Place	:	
Fairborn, OH 45324	:	2014-2241
Relators,	:	
vs.	:	
KEESHA A. BARTON, et al.,	:	
Respondents,	:	Case No. 2013-DR-0207
	:	Court of Appeals No. 2014-CA-0046
	:	
	:	Case No. 2013-DV-0193
	:	Court of Appeals No. 2014-CA-0021
	:	
	:	AFFIDAVIT OF ARREST
	:	CHARLES SLICER

AFFIDAVIT OF ARREST for CHARLES SLICER

Pursuant to O.R.C. 2935.09 & 2935.10 this Affidavit of Arrest is submitted for Official Review.

O.R.C. 2921.32 Obstructing Justice. Felony of Third Degree.

The Respondent Charles Slicer on 18 July 2014, 11 Aug 2014 and 12 Sep 2014 did materially assist Keesha A. Barton in the commission of crimes (O.R.C. 2913.02 Theft (B)(3), O.R.C. 2913.43 Securing writing by deception (B)(3), and O.R.C. 2913.05 Telecommunications Fraud. The Respondent Keesha A. Barton on or about 10 April 2014 did knowingly contact USAA (San Antonio, TX) through electronic means (cellular or electronic mail) and cause the subsequent letter (see Exhibit E). Respondent KAB then used letter to defraud, misrepresent and encumber the motor vehicle of Relator Douglas C. Barton to the Greene County Clerk of Courts Title Division. The Respondent KAB then misrepresented to trial court on 6 June 2014,

alleging Contempt of Court on basis of fraudulent documents. Respondent KAB presented the fraudulent title through her counsel Charles Slicer. Relator DCB upon further investigation discovered the means of fraud, and presented these facts to the GCCC Title Division. The GCCC Title Division within minutes canceled the fraudulent title, re-issued previous title #29 0129 2896 (see Exhibit F). During the subsequent court dates (18 July 2014, 11 Aug 2014) Relator DCB complained to the trial court on record about the fraudulent title.

REVIEWING OFFICIAL
SUPREME COURT OF OHIO

AFFIDAVIT

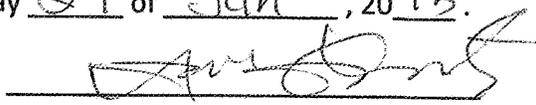
I, **DOUGLAS C. BARTON**, Relator herein, swear or affirm that I have read this document and, to the best of my knowledge and belief, the facts and information stated in this document are true, accurate and complete. I understand that if I do not tell the truth, I may be subject to penalties for perjury.



DOUGLAS C. BARTON
RELATOR, PRO SE
437 WARWICK PLACE
FAIRBORN, OH 45324
513-508-7515

Sworn before me and signed in my presence this day 29 of Jan, 2015.





Sun Keating Notary Public
Notary Public, State of Ohio
My Commission Expires 06-24-2019

My Commission Expires: June 24, 2019

SUPREME COURT OF OHIO

THE STATE OF OHIO ex rel.	:	
DOUGLAS C. BARTON	:	
Relator, Pro Se	:	Supreme Court Case No:
437 Warwick Place	:	
Fairborn, OH 45324	:	2014-2241
Relators,	:	
vs.	:	
KEESHA A. BARTON, et al.,	:	Case No. 2013-DR-0207
Respondents,	:	Court of Appeals No. 2014-CA-0046
	:	
	:	Case No. 2013-DV-0193
	:	Court of Appeals No. 2014-CA-0021
	:	
	:	AFFIDAVIT OF ARREST
	:	STEPHEN HURLEY

AFFIDAVIT OF ARREST for STEPHEN HURLEY

Pursuant to O.R.C. 2935.09 & 2935.10 this Affidavit of Arrest is submitted for Official Review.

O.R.C. 2921.45 Interfering with civil rights. Misdemeanor of First Degree

The Respondent Stephen Hurley under color of his office knowingly deprived the Relator of his constitutional and statutory rights on 16 Aug 2013 and 4 Dec 2013. The Respondent Stephen Hurley's mutual restraining orders issued 16 Aug 2013 with no hearing violates the US Constitution "Due Process Clause" the only Amendment to be stated twice (5th & 14th respectively). Respondent Stephen Hurley failure to properly supervise his subordinates who issued the ex-parte order that violated the Relator DCB's civil rights (failed to grant hearing within 10 days) guaranteeing "due process". Respondent Stephen Hurley through counsel did

admit to the material facts related to the 4th of December 2013, see *Barton v. Hurley* 3:14-CV-001.

REVIEWING OFFICIAL
SUPREME COURT OF OHIO

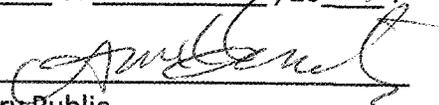
AFFIDAVIT

I, **DOUGLAS C. BARTON**, Relator herein, swear or affirm that I have read this document and, to the best of my knowledge and belief, the facts and information stated in this document are true, accurate and complete. I understand that if I do not tell the truth, I may be subject to penalties for perjury.



DOUGLAS C. BARTON
RELATOR, PRO SE
437 WARWICK PLACE
FAIRBORN, OH 45324
513-508-7515

Sworn before me and signed in my presence this day 29 of Jan, 2015.



Notary Public

My Commission Expires:

June 24, 2019.



Sun Keating
Notary Public, State of Ohio
My Commission Expires 06-24-2019

CERTIFICATE OF SERVICE

I hereby certify that a copy of this OPPOSITION TO DISMISS & AFFIDAVITS OF ARREST was served by first class mail via the US Postal Service on the 30th day of JAN, 2015, upon the following:

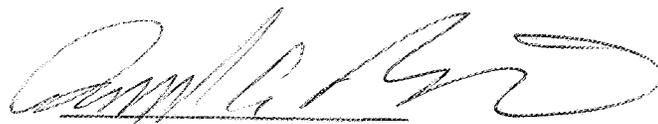
Nicole Rutter-Hirth
Attorney for Keesha A. Barton
Suite 2150
130 W. Second Street
Dayton, OH 45402

John M. Ruffolo
Attorney for Charles Slicer
7501 Paragon Road
Dayton, OH 45459

Michael P. McNamee & Gregory B. O'Connor
Attorney for David McNamee
2625 Commons Blvd., Suite A
Beavercreek, OH 45431

Sarah E. Pierce & Tiffany L. Carwile
Attorneys for Second District Court of Appeals
30 East Broad Street, 16th Floor
Columbus, OH 43215

Elizabeth A. Ellis
Attorney for
-Greene Co. DRC
-Timothy Campbell
-Stephen Hurley
61 Greene Street
Suite 200
Xenia, OH 45385



Douglas C. Barton
Reliator, Pro Se