

**CRIMINAL COMPLAINT AND REQUEST FOR INVESTIGATION FILED BY
 VOGEL DENISE NEWSOME WITH THE
 FEDERAL BUREAU OF INVESTIGATION – CINCINNATI, OHIO DIVISION and
 REQUEST TO BE NOTIFIED OF CONFLICT-OF-INTEREST
 JUNE 30, 2015**

USPS PRIORITY MAIL TRACKING NO.: 9505 5000 1638 5181 0001 24



**HOW MUCH Did President Barack Obama SELL His SOUL To The JEWS For?
 A HIGH Price To PAY For A LOW Standard Of Living!
 Of COURSE They Would Place A BLACK-American To VOLUNTEER To Be In
 The WHITE House To OVERSEE The ONSET Of The COLLAPSE Of The
 United States Of America's DESPOTISM-Controlled Empire!**

**AS OF JULY 22, 2015 – The FBI Has NOT Contacted
 Vogel Newsome To Provide Her With CASE NUMBER Assigned!
OBSTRUCTING JUSTICE/FEDERAL INVESTIGATION(S)!**

Tracking Number: 9505500016385181000124

Delivered

On Time
 Expected Delivery Day: Friday, July 3, 2015

DATE & TIME	STATUS OF ITEM	LOCATION
July 3, 2015, 11:27 am	Delivered, Front Desk/Reception	CINCINNATI, OH 45236
Your item was delivered to the front desk or reception area at 11:27 am on July 3, 2015 in CINCINNATI, OH 45236.		
July 3, 2015, 8:49 am	Out for Delivery	CINCINNATI, OH 45236
July 3, 2015, 8:39 am	Sorting Complete	CINCINNATI, OH 45236
July 3, 2015, 5:44 am	Arrived at Post Office	CINCINNATI, OH 45236
July 3, 2015, 3:18 am	Departed USPS Facility	CINCINNATI, OH 45235
July 2, 2015, 9:10 pm	Arrived at USPS Origin Facility	CINCINNATI, OH 45235
July 2, 2015, 5:37 am	Departed USPS Facility	JACKSON, MS 39201
July 1, 2015, 10:40 pm	Arrived at USPS Facility	JACKSON, MS 39201
June 30, 2015, 10:49 pm	Acceptance (SSK)	JACKSON, MS 39201

VOGEL DENISE NEWSOME

P.O. Box 31265
Jackson, Mississippi 39286
Phone: (601) 885-9536 or (513) 680-2922

June 30, 2015 USPS Tracking #9505 5000 1638)
5181 0001 24 4

United States Department of Justice
Federal Bureau Of Investigation
ATTN: Angela L. Byers - Special Agent In Charge
2012 Ronald Reagan Drive
Cincinnati, Ohio 45236

**RE: CRIMINAL COMPLAINT AND REQUEST FOR INVESTIGATION FILED
BY VOGEL DENISE NEWSOME WITH THE FEDERAL BUREAU OF
INVESTIGATION - CINCINNATI, OHIO DIVISION and REQUEST TO
BE NOTIFIED OF CONFLICT-OF-INTEREST - JUNE 30, 2015**

Dear Honorable Angela L. Byers:

Attached is the above referenced Criminal Complaint that I am submitting to be filed on my behalf under FEDERAL Statutes/Laws and/or applicable laws governing said matters. Upon filing, please provide me with the Case Number assigned.

Thank you for your assistance in this matter. Should you have any questions, please do not hesitate to contact me.

With Warmest Regards,



Vogel Denise Newsome

**CRIMINAL COMPLAINT AND REQUEST FOR INVESTIGATION FILED BY
VOGEL DENISE NEWSOME WITH THE
FEDERAL BUREAU OF INVESTIGATION – CINCINNATI, OHIO DIVISION and
REQUEST TO BE NOTIFIED OF CONFLICT-OF-INTEREST
JUNE 30, 2015¹**

COMES NOW, Vogel Denise Newsome ("Newsome") and files this **Criminal** Complaint and Request for Investigation with the Federal Bureau of Investigation of and against the following persons:

Person(s)/Conspirator(s) - The following are collectively known as Person(s)/Conspirator(s):

- 1) Anna Louise Inn ("ALI") – i.e. ALI in this Complaint encompasses shareholders, insurance carrier(s), employees, counsel, agents, representatives, etc.
- 2) Stephen T. MacConnell ("MacConnell") – President & CEO
- 3) Robin Stanley ("Stanley") – Director of Operation
- 4) Mary Carol Melton ("Melton") – Executive Vice President
- 5) Mary Catherine Scheele ("Scheele")
- 6) Loretta Sims ("Sims")
- 7) Tracy Winkler ("Winkler") – Clerk Of Court In her Individual Capacity
- 8) *Judge Heather Russell ("Judge Russell" or "Russell") – In her Individual Capacity
- 9) *Magistrate Judge Deborah Casey ("Magistrate Casey" or "Casey") – In her Individual Capacity
- 10) *Magistrate Judge Melissa E. West ("Magistrate West" or "West") – In her Individual Capacity
- 11) *Mike Garvey ("Garvey") – Deputy Bailiff - In his Individual Capacity
- 12) Stuart L. Richards ("Richards")

* *Dennis v. Sparks*, 101 S.Ct. 183 (U.S.Tex.,1980) - **State judge** may be found **criminally** liable for violation of civil rights even though the judge may be immune from damages under the civil statute. 18 U.S.C.A. § 242; 42 U.S.C.A. § 1983.

Ocala Star-Banner Co. v. Damron, 91 S.Ct. 628 (1971) - **Charge of criminal conduct against public official** or candidate for public office, no matter how remote in time or place, **is always relevant to his fitness for office.** . .

Gandia v. Pettingill, 32 S.Ct. 127 (1912) - **Anything bearing upon the acts of a public officer connected with his office is a legitimate subject of statement and comment**, at least in the absence of express malice.

¹ Boldface, Italics, Underline, etc. added for emphasis.

- 13) Keating Muething & Klekamp (“Keating”) – i.e. in this Complaint encompasses shareholders, insurance carrier(s), lawyers/attorneys, employees, agents, representatives, etc.
- 14) U.S.A. President Barack Hussein Obama II (“Obama”) – In his individual capacity
- 15) Baker Donelson Bearman Caldwell & Berkowitz PC (“Baker Donelson”) – i.e. in this Complaint encompasses shareholders, insurance carrier(s), lawyers/attorneys, employees, agents, representatives, etc.
- 16) Locksmith used (name(s) to be determined during this investigation)
- 17) *John/Jane Doe(s) – Provide names upon receipt through investigation

for the following criminal acts and/or charges:

[Home](#) - [About Us](#) - [What We Investigate](#)



Spies. Terrorists. Hackers. Pedophiles. Mobsters. Gang leaders and serial killers. We investigate them all, and many more besides.

The very heart of FBI operations lies in our investigations—which serve, as our mission states, “to protect and defend the United States against terrorist and foreign intelligence threats and to enforce the criminal laws of the United States.” We currently have jurisdiction over violations of more than 200 categories of federal law, and you can find the major ones below, grouped within our national security and criminal priorities. Also visit our [Intelligence program site](#), which underpins and informs all our investigative programs.

In Depth

Terrorism

- International Terrorism
- Domestic Terrorism

Counterintelligence

- Counterespionage
- Counterproliferation
- Economic Espionage

Cyber Crime

- Computer Intrusions
- Internet Fraud
- Identity Theft

Weapons of Mass Destruction

- Key Programs

Public Corruption

- Government Fraud
- Election Fraud
- Foreign Corrupt Practices

Civil Rights

- Hate Crime
- Human Trafficking
- Color of Law
- Freedom of Access to Clinics
- International Human Rights

Organized Crime

- Italian Mafia/LCN
- Eurasian
- Balkan
- Middle Eastern
- Asian
- African
- Sports Bribery

White-Collar Crime

- Antitrust
- Bankruptcy Fraud
- Corporate Fraud
- Financial Institution Fraud & Failures
- Health Care Fraud
- Insurance Fraud
- Mass Marketing Fraud
- Money Laundering
- Mortgage Fraud
- Piracy/Intellectual Property Theft
- Securities and Commodities Fraud
- More White-Collar Frauds

Violent Crime and Major Thefts

- Art Theft
- Bank Robbery
- Cargo Theft
- Gangs
- Indian Country Crime
- Jewelry and Gem Theft
- Online Predators
- Retail Theft
- Vehicle Theft
- Violent Crimes Against Children
- More

I. CONSPIRACY:²

Conspiracy - An agreement by two or more persons to commit an unlawful act, coupled with an intent to achieve the agreement's objective, and (in most states) action or conduct that furthers the agreement; a combination for an unlawful purpose. 18 USC ~371. . . .

² Definition taken from Blacks Law Dictionary – Eighth Edition.

"When two or more persons combine for the purpose of inflicting upon another person an injury which is unlawful in itself, or which is rendered unlawful by the mode in which it is inflicted, and in either case the other person suffers damage, they commit the tort of conspiracy." P.H. Winfield, *A Textbook of the Law of Tort* ~128, at 434 (5th ed. 1950)

Chain Conspiracy - A single conspiracy in which each person is responsible for a distinct act within the overall plan. . . . ***All participants are interested in the overall scheme and liable for all other participants' acts in furtherance of that scheme.** (Conspiracy ~24(3) C.J.S. Conspiracy ~117-118.

Conspire - To engage in conspiracy; to join in a conspiracy.

Conspirator - A person who takes part in a conspiracy.

1. Through this instant Complaint, Newsome is requesting an investigation into the claims and allegations set forth herein to determine whether any and/or all of the above referenced person(s)/conspirator(s) engaged in a conspiracy toward Newsome. If so, that the proper prosecution and indictments be rendered and the applicable punishment permissible and/or required by statutes/laws be had of and/or against any of the person(s)/conspirator(s) found to be guilty of said crime and/or unlawful/illegal action.

2. Newsome believes that an investigation into allegations and claims against the above referenced person(s)/conspirator(s) will support that two or more of said person(s)/conspirator(s) agreed to commit unlawful/illegal acts coupled with the intent to achieve the agreements' objectives: **(a)** to discriminate against Newsome in housing; **(b)** subject Newsome to harassment, threats, hostile treatments, intimidation, discrimination, malicious prosecution, corruption, hatred, hostility, mail fraud, fraud upon the court, etc.; **(c)** interfere with Civil Rights of Newsome through the obstruction of justice; **(d)** subject Newsome to unlawful entries, theft, burglary, larceny, invasion/invasion of privacy, etc.; **(e)** conspiracy against rights; **(f)** deprivation of equal protection of the laws and immunity; **(g)** and any such unlawful/illegal acts found during the handling of this investigation.

Scales v. U.S., 81 S.Ct. 1469 (1961) - Legal concepts of conspiracy and complicity manifest general principle that society, having power to punish dangerous behavior, cannot be powerless against those who work to bring about that behavior.

"Complicity" means that a person is an accomplice of another person in commission of a crime, if with purpose of promoting or facilitating commission of the crime he commanded, requested, encouraged or provoked such other person to commit it, or aided, agreed to or attempted to aid such other person in planning or committing it, or, acting with knowledge that such other person was committing the crime, knowingly, substantially facilitated its commission. *Id.*

Pereira v. U.S., 74 S.Ct. 358 (1954) - One who aids, abets, counsels, commands, induces, or procures the commission of an act is as responsible for that act as if he had directly committed the act himself. 18 U.S.C.A. § 2(a).

"Aiding, abetting and counseling" are not terms which presuppose existence of an agreement, but such terms have a broader application, making defendant a principal when he consciously shares in a criminal act, regardless of existence of a conspiracy. *Id.*

U.S. v. Williams, 71 S.Ct. 595 (1951) - “**Aiding and abetting**” means **to assist** the perpetrator of the crime.

3. The above referenced person(s)/conspirator(s) conspired for the purpose of inflicting upon Newsome intentional and deliberate injury/harm which they knew was unlawful/illegal and inflicted in a manner known to said person(s)/conspirator(s) to be unlawful/illegal and prohibited by statutes/laws. Such actions which resulted in criminal wrong doing of and against Newsome by person(s)/conspirator(s) as a direct and proximate result of the conspiracy leveled against her.

U.S. v. Jimenez Recio, 123 S.Ct. 819 (2003) - Essence of a conspiracy is an agreement to commit an unlawful act.

Agreement to commit an unlawful act, which constitutes the essence of a conspiracy, *is a distinct evil* that may exist and be punished whether or not the substantive crime ensues. *Id.*

Conspiracy poses a threat to the public over and above the threat of the commission of the relevant substantive crime, both because the combination in crime makes more likely the commission of other crimes and because it decreases the probability that the individuals involved will depart from their path of criminality. *Id.*

4. Each of the above referenced person(s)/conspirator(s) were responsible for a distinct act within the overall plan of the conspiracy in which they were willing participants. Said person(s)/conspirator(s) **having an interest in the overall scheme** and **the outcome** of said scheme/conspiracy and is therefore, liable for their action and/or those of other's in the carrying out of their role in the illegal/unlawful actions against Newsome in furtherance of the conspiracy alleged.

II. BURGLARY:

Burglary - (2) The modern statutory offense of breaking and entering any building - not just a dwelling, and not only at night - with the intent to commit a felony.

Burglar - One who commits burglary.

Burglarized - To commit burglary.

Breaking - (Criminal Law): In the law of burglary, the act of entering a building without permission.

"[T]o constitute a breaking at common law, there had to be the creation of a breach or opening; a mere trespass at law was insufficient. If the

occupant of the dwelling had created the opening, it was felt that he had not entitled himself to the protection of the law, as he had not properly secured his dwelling . . . In the modern American criminal codes, only seldom is there a requirement of breaking. This is not to suggest, however, that elimination of this requirement has left the 'entry' element unadorned, so that any type of entry will suffice. Rather, at least some of what was encompassed within the common law 'breaking' element is reflected by other terms describing what kind of entry is necessary. The most common statutory term is 'unlawfully,' but some jurisdictions use other language, such as '**unauthorized**,' by '**trespass**,' '**without authority**,' '**without consent**,' or '**without privilege**.' Wayne R. LaFare & Austin W. Scott Jr., *Criminal Law* ~8.13 at 793-94 (2d ed. 1986).

1. As a matter of law, certain of the person(s)/conspirator(s) (i.e. for instance MacConnell, Stanley, Richards, Garvey, Casey, West, Russell, Locksmith, John/Jane Does) - to be determined through the investigation of this Complaint, acted as burglars in the burglarizing of Newsome's residence located at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202. Therefore, Newsome is requesting through this instant Complaint that an investigation into the claims and allegations set forth herein and that those found to have acted in such unlawful/illegal manner be prosecuted and indicted for said legal wrongs.

2. Newsome learned of the criminal actions of person(s)/conspirator(s) upon reviewing the Hamilton County (Ohio) Municipal Court Docket.

3. Newsome TIMELY, PROPERLY and ADEQUATELY NOTIFIED ALI/Stanley of NOT receiving “Service Of Process” in which Stanley advised Newsome she will be receiving. Said statement being made by Stanley with KNOWLEDGE that she and others were ENGAGING in criminal acts and COMMITTING FRAUD and other crimes upon the Court as well as upon Newsome.

4. Certain person(s)/conspirator(s) - to be determined through investigation; beginning with Stephen T. MacConnell, Robin Stanley, Stuart L. Richards - committed a criminal offense and/or modern statutory offense of burglary wherein they used, participated and/or unlawfully authorized excessive force and breaking force in entering Newsome's residence with deliberate, willful and malicious intent to commit a felony. Said person(s)/conspirator(s) knowingly and deliberately with malicious intent entered the residence of Newsome **without her permission**. Prior to such unlawful/excessive use of force by certain person(s)/conspirator(s), they were put on notice through Newsome's Court filings submitted via facsimile and/or mail they were engaging in criminal/civil wrongs; moreover, that CRIMINAL actions will be brought should they elect to carry out the unlawful/illegal eviction against Newsome.

5. Newsome's residence was properly secured upon her leaving on or about December 26, 2013, to prevent the unlawful/illegal entry by ALI Parties and/or person(s)/conspirator(s) engaging in the unlawful/illegal eviction/removal practices. Newsome taking the necessary steps to secure her privacy, protect her property, life, liberties and pursuit of happiness. To no avail.

6. On or about June 30, 2014, despite Newsome's *efforts to protect* her residence and property/possession, she was subjected to burglary, theft, larceny, unauthorized entry, illegal/unlawful warrant of possession, unlawful/illegal eviction, unlawful/illegal seizure of her property/possession and residence; trespassing, etc. through the execution of an unlawful/illegal Writ of Execution for Eviction executed by the Judge who lacked jurisdiction in the matter and neither had authority and/or jurisdiction to execute such action taken against Newsome - all being done **without prior notice** to Newsome and **without Newsome's consent** and **without privilege** afforded under the statutes/laws governing said matters.

7. Newsome through the filing of this instant Complaint seeks the prosecution and indictment of person(s)/conspirator(s) found through an investigation to be guilty of the crime of burglary, conspiracy to commit burglary, and/or their participation in such burglary set forth herein against Newsome's residence/property. Moreover, all person(s)/conspirator(s) that knew and/or had knowledge that said burglary was about to be committed and/or being committed and did nothing to prevent - *having knowledge that any of the wrongs conspired to be done was about to be committed, and having the power to prevent or aid in the preventing of such criminal acts; however, neglects or refuses to do so.*

III. THEFT:

Theft - (1) The felonious taking and removing of another's personal property with the intent of depriving the true owner of it; larceny [Cases: Larceny ~1. C.J.S. Larceny ~1(1,2), 9.] (2) Broadly, any act or instance of stealing, including larceny, burglary, embezzlement, and false pretenses.

Under such a statute it is not necessary for the indictment charging theft to specify whether the offense is larceny, embezzlement or false pretenses." Rollin M. Perkins & Ronald N. Boyce, Criminal Law 389-90 (3d ed. 1982).

Theft by Deception - The use of trickery to obtain another's property, esp. by (1) creating or reinforcing a false impression . . . (2) preventing one from obtaining information that would affect one's judgment about a transaction, or (3) failing to disclose, in a property transfer, a known lien or other legal impediment.

Theft by Extortion - Larceny in which the perpetrator obtains property by threatening to (1) inflict bodily harm on anyone or commit any other criminal offense. . . (4) take or withhold action as an official, or cause an official to take or withhold action, (5) bring about . . . collective unofficial action, if the property is not

demanded or received for the benefit of the group in whose interest the actor purports to act, (6) testify or provide information or withhold testimony or information with respect to another's legal claim or defense, or (7) inflict any other harm that would not benefit the actor.

Theft of Services - The act of obtaining services from another by deception, threat, coercion, stealth, mechanical tampering, or using a false token or device.

1. As a matter of law, certain of the person(s)/conspirator(s) (i.e. for instance MacConnell, Stanley, Richards, Garvey, Casey, West, Russell, Locksmith, John/Jane Does) - to be determined through the investigation of this Complaint, acted as thieves in the theft of Newsome's property/possessions located at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202. Therefore, Newsome is requesting through this instant Complaint that an investigation into the claims and allegations set forth herein and that those found to have acted in such unlawful/illegal manner be prosecuted and indicted for said legal wrongs.

2. Certain person(s)/conspirator(s) - to be determined through investigation (i.e. beginning with MacConnell, Stanley, Richards, etc.) - unlawfully/illegally feloniously stole Newsome's property/possessions and took her residence away from her. Upon committing such theft, discarded Newsome's property/possession publicly in efforts to rid themselves of the criminal activities committed against Newsome. Deliberate actions done to destroy and get rid of the evidence. Certain person(s)/conspirator(s) having foresight and knowledge that they were committing a crime and that theft of Newsome's property/possession was prohibited by statutes/laws. In an effort to prevent from getting caught with Newsome's property/possession, they discarded to provide themselves and/or the public with unlawful/illegal access to said property/possession. Certain person(s)/conspirator(s) committed such criminal acts of theft with the purpose of depriving Newsome of her property/possession and residence. Certain person(s)/conspirator(s) changing the locks of the apartment building and on Newsome's residence for purposes of unlawfully/illegally denying Newsome access to her residence/property.

3. Newsome's residence and property/possessions were unlawfully/illegally seized through false pretenses.

4. While certain person(s)/conspirator(s) relied upon "***theft by deception***" to burglarize Newsome's residence and steal her residence and property/possession from her, said acts were done for purposes of (a) creating or reinforcing a false impression; (b) obstruct, prevent and/or withhold information from one that would affect one's judgment about the action and services requested - however, it is important to note that such a one may or may not have had knowledge that ALI engaged in "fraud upon the Court" to further role(s) in conspiracies leveled against; moreover, *they had a duty to inquire and obtain information as to whether the actions ALI were about to take was legal and/or in compliance with the laws*; (c) failing to reveal or disclose that they were acting in violation of Ohio Statutes/Laws as well as other statutes/laws (FEDERAL and State) governing said matters prohibiting the removal/eviction of Newsome from her residence.

5. Certain person(s)/conspirator(s) committed "***theft by extortion***" by larceny to

obtain Newsome's residence/property: **(a)** to subject her to further injury/harm, harassment, humiliation, duress, oppression, discrimination, prejudices, threats, coercion - all which were foreseeable; **(b)** coerced other officials/persons to engage and/or participate in the theft of Newsome's property/possessions and to help themselves to same; **(c)** brought about unwarranted/unauthorized action by distorting and/or ignoring the laws/statutes prohibiting such criminal actions; **(d)** deliberately engaged in the OBSTRUCTION of Judicial proceedings and OBSTRUCTION of the service of process; and **(e)** deliberately withholding information to obtain unlawful/illegal entry of Newsome's residence and to steal and/or commit burglary and theft of her residence and property/possession.

1923.06 Summons - service of process.

(A) Any summons in an action, including a claim for possession, pursuant to this chapter shall be issued, be in the form specified, and be served and returned as provided in this section. Such service shall be at least seven days before the day set for trial.

(B) Every summons issued under this section to recover residential premises shall contain the following language printed in a conspicuous manner: "A complaint to evict you has been filed with this court. No person shall be evicted unless the person's right to possession has ended and no person shall be evicted in retaliation for the exercise of the person's lawful rights. If you are depositing rent with the clerk of this court you shall continue to deposit such rent until the time of the court hearing. The failure to continue to deposit such rent may result in your eviction. You may request a trial by jury. You have the right to seek legal assistance. If you cannot afford a lawyer, you may contact your local legal aid or legal service office. If none is available, you may contact your local bar association."

(C) The clerk of the court in which a complaint to evict is filed shall mail any summons by ordinary mail, along with a copy of the complaint, document, or other process to be served, to the defendant at the address set forth in the caption of the summons and to any address set forth in any written instructions furnished to the clerk. The mailing shall be evidenced by a certificate of mailing which the clerk shall complete and file.

In addition to this ordinary mail service, the clerk also shall cause service of that process to be completed under either of the following:

(1) Division (D) or (E) of this section or both, depending upon which of those two methods of service is requested by the plaintiff upon filing the complaint to evict;

6. Newsome through the filing of this instant Complaint seeks an investigation and the prosecution and indictment of person(s)/conspirator(s) found through said investigation to be guilty of the crime of theft, conspiracy to commit theft, and/or their participation in such theft set forth herein against Newsome's property/possessions. Moreover, all person(s)/conspirator(s) that knew and/or had knowledge that said theft was about to be committed and/or being committed and did nothing to prevent - having knowledge that any of the wrongs conspired to be done was about to be committed, and having the power to prevent or aid in the preventing of such criminal acts; however, neglected or refused to do so.

7. ALI advised Newsome that she will be served with a Notice to Vacate; however, Newsome TIMELY, PROPERLY and ADEQUATELY notified ALI's Stanley and MacConnell of said error and/or unlawful/illegal practices. Newsome being in RIGHTFUL possession of her residence located at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202 at the time of ALI's unlawful/illegal issuance of Notice to Vacate.

65 Ohio Jur.3d § 164 – Notice to vacate; bringing possessory action:

A notice by the landlord that the tenancy is being terminated, combined with a demand by him or her for possession of the premises, and **voluntary compliance** therewith by the tenant without protest, *is not an* eviction for which damages may be recovered. (*Greenberg v. Murphy*, 16 Ohio C.D. 359, 1904 WL 1147 (Ohio Cir. Ct. 1904)).

[Practice Guide: If the tenant is *rightfully in possession and entitled*

to remain, **the tenant SHOULD AWAIT legal proceedings that are threatened**, and make *defense* thereto, **RATHER THAN COMPLY with the demand, and then bring an action for alleged damages that perhaps never would have resulted.** (*Greenberg*)]

Where a tenant, upon request or notice to vacate, **VOLUNTARILY** abandons the premises **without protest, no action for damages against the landlord, based on fraud or misrepresentations as to the reasons for such request can be maintained under rights recognized by the common law, or any statute of Ohio.** (*Ferguson v. Buddenberg*, 87 Ohio App. 326, 42 Ohio Op. 488, 57 Ohio L. Abs. 473, 94 N.E.2d 568 (1st Dist. Hamilton County 1950)).

In an eviction action for nonpayment of rent brought by a landlord **pursuant to RC Ch 1923**, a tenant **MAY RESPOND** by asserting any *legal defense he has to that action*, pursuant to RC 1923.061(A), and/or **by filing a COUNTERCLAIM for damages** caused by the landlord's **breach of the rental agreement** and/or the landlord's breach of his duties under RC 5321.04. *Smith v. Wright* (Ohio App. 1979) 65 Ohio App.2d 101, 416 N.E.2d 655, 19 O.O.3d 59.

8. Newsome did NOT voluntarily abandon her apartment located at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202 .

9. The record evidence will support that person(s)/conspirator(s) DENIED Newsome equal protection of the laws and DEPRIVED her rights secured under the Constitution and other statutes/laws governing said matters with KNOWLEDGE that upon being “LEGALLY SERVED” with Service of Summons/Process, Newsome made known her intent to file a COUNTERCLAIM.

10. The record evidence will support that party(s)/conspirator(s) engaged in criminal acts with purposes and intent of getting Newsome to WAIVE PROTECTED rights and REPEATEDLY attempted to COERCE her into making a Court appearance for purposes of WAIVING protected rights; moreover, for purposes of INDUCING Newsome to surrender to the Hamilton County (Ohio) Municipal Court's JURISDICTION through, THREATS, BLACKMAIL, EXTORTION, INTIMIDATION, COERCION, etc. The record evidence supporting Newsome's concerns regarding THREATS on her life and notifying said Court that she will not attend judicial proceedings and the grounds for non-attendance. See **June 12, 2014 Non-Attendance Pleading** and **July 23, 2014 Non-Attendance**. . Pleadings - documents that were filed in the Hamilton County (Ohio) Municipal Court at Civil Action No. 14-CV-11786.

11. The record evidence will support ALI BREACHED the Rental Agreement entered into with Newsome. See



EXCERPT FROM **AUGUST 2013** CONFERENCE
 BETWEEN DENISE NEWSOME and
 ANNA LOUISE INN'S
 DIRECTOR OF OPERATION - ROBIN STANLEY

Newsome:	...and when I say VERBAL AGREEMENT, we have a Verbal Agreement ...
Stanley:	We have a VERBAL Understanding!
Newsome:	Verbal . . . well . . .
Stanley:	Not an agreement. . .
Newsome:	Well either way. . .
Stanley:	UNDERSTANDING!

<http://www.slideshare.net/VogelDenise/anna-louise-inn-telephone-conferences-transcript-excerpt-between-newsome-robin-stanley> - Incorporated by reference as if set forth in full herein.

IV. LARCENY:

Larceny - The unlawful taking and carrying away of someone else's personal property with the intent to deprive the possessor of it permanently. *Common-law larceny has been broadened by some statutes to include embezzlement and false pretense, all three of which are often subsumed under the statutory crime of "theft."

"The criminal offence of larceny or theft in the Common Law was intimately connected with the civil wrong of trespass. 'Where there has been no trespass,' said Lord Coleridge, 'there can at law be no larceny.' Larceny, in other words, is merely a particular kind of trespass to goods which, by virtue of the trespasser's intent, is converted into a crime. Trespass is a wrong, not to ownership but to *possession*, and theft, therefore, is not the violation of a person's right to ownership, but the infringement of his possession, accompanied with a particular criminal intent."

Aggravated Larceny - Larceny accompanied by some aggravating factor (as when the theft is from a person).

Grand Larceny - Larceny of property worth more than a statutory cutoff amount, usu. \$100.

Mixed Larceny - (1) Larceny accompanied by aggravation or violence to the person. (2) Larceny involving a taking from a house.

1. As a matter of law, certain of the person(s)/conspirator(s) (i.e. for instance MacConnell, Stanley, Richards, Garvey, Casey, West, Russell, Locksmith, John/Jane Does) - to be determined through the investigation of this Complaint, whether said person(s)/conspirator(s) committed larceny by unlawfully/illegally engaging in the carrying away of Newsome's property/possessions located at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202 and the taking away of her residence with full intent to deprive her permanently of said residence. Certain person(s)/conspirator(s) knew and/or should have known that they were trespassing. By committing such legal wrongs person(s)/conspirator(s) infringed upon the Constitutional and Civil Rights of Newsome. Therefore, Newsome is requesting through this instant Complaint that an investigation into the claims and allegations set forth herein and that those found to have acted in such unlawful/illegal manner be prosecuted and indicted for said legal wrongs.

2. Newsome files the instant Complaint and request investigation of and against certain person(s)/conspirator(s) for aggravated larceny. Said criminal actions being committed for purposes of **(a)** unlawfully/illegally depriving Newsome of her residence and property/possession; **(b)** for the theft and/or unlawful/illegal action to take monies to which they are not entitled to in excess of \$5,000.00; **(c)** the value of property stolen from Newsome exceeds \$100.00; **(d)** for the unlawful/illegal taking of Newsome's residence; **(e)** to commit aggravated larceny, grand larceny and/or mixed larceny against Newsome.

3. Newsome through the filing of this instant Complaint seeks an investigation and the prosecution and indictment of person(s)/conspirator(s) found through said investigation to be guilty of the crime of larceny, conspiracy to commit larceny, and/or their participation in such larceny set forth herein against Newsome. Moreover, all person(s)/conspirator(s) **that knew** and/or **had knowledge** *that said larceny was about to be committed and/or being committed* and **did nothing to prevent** - having knowledge that any of the wrongs conspired to be done was about to be committed, and having the power to prevent or aid in the preventing of such criminal acts; however, neglected or refused to do so. Certain person(s)/conspirator(s) - to be determined through investigation - allowed said crime to be committed for their own personal and financial gain.

V. INVASION:

Invasion - (1) A hostile or forcible encroachment on the rights of another.

Intentional Invasion - A hostile or forcible encroachment on another's interest in the use or enjoyment of property, esp. real property, though not necessarily inspired by malice or ill will.

Invasion of Privacy - An unjustified exploitation of one's personality or intrusion into one's personal activities, actionable under tort law and sometimes under constitutional law.

Invasion of Privacy by Intrusion - An offensive, intentional interference with a person's seclusion or private affairs.

Intrusion - (1) A person entering without permission. (2) In an action for invasion of privacy, a highly offensive invasion of another person's seclusion or private life.

Intruder - A person who enters, remains on, uses, or touches land or chattels in another's possession without the possessor's consent.

1. As a matter of law, certain of the person(s)/conspirator(s) (i.e. for instance MacConnell, Stanley, Richards, Garvey, Casey, West, Russell, Locksmith, John/Jane Does) - to be determined through the investigation of this Complaint, whether said person(s)/conspirator(s) committed criminal acts of - - **(a)** Invasion; **(b)** Invasion of Privacy; **(c)** Invasion of Privacy by Intrusion in that *(i)* certain person(s)/conspirator(s) acted with hostile intent as well as forcible encroachment and/or allowed others to forcibly encroach upon the protected rights of Newsome. Rights secured under the Constitution (Ohio and United States), Civil Rights Act, Fair Housing Act and other statutes/laws governing said matters; *(ii)* said invasion was "intentionally" done with hostility, anger, envy, jealousy, prejudice, discrimination, ill intent, malice, corruption, etc. and/or forcible encroachment on Newsome's interest in the use of enjoyment of her property/residence; *(iii)* said crime was an invasion of Newsome's privacy and was an unlawful/illegal and **unjustified exploitation** of Newsome's life, **intrusion into** Newsome's personal life, liberties and pursuit of happiness, as well as other rights secured/guaranteed under the Constitution, Civil Rights Act and other statutes/laws governing said matters; *(iv)* said criminal acts being an **invasion of privacy by intrusion** which being offensive and an intentional interference with Newsome's seclusion and/or private life/affairs; *(v)* certain person(s)/conspirator(s) intruding and/or unlawfully taking and/or participated in the unlawful taking of Newsome's residence and property/possessions and continue to use her residence to destroy evidence, and cover up their crime - - by unlawfully/illegally carrying away Newsome's property/possessions located at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202 and the taking away of her residence with full intent to deprive her permanently of said residence.

Said invasion/intrusion took place at Newsome's apartment located at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202. Therefore, Newsome is requesting through this instant Complaint that an investigation into the claims and allegations set forth herein and that those found to have acted in such unlawful/illegal manner be prosecuted and indicted for said legal wrongs.

2. Newsome through the filing of this instant Complaint seeks an investigation and the prosecution and indictment of person(s)/conspirator(s) found through said investigation to be guilty of the intrusion/invasion, conspiracy to commit intrusion/invasion, and/or their participation in such acts set forth herein against Newsome. Moreover, all person(s)/conspirator(s) that knew and/or had knowledge that said invasion/intrusion was about to be committed and/or being committed and did nothing to prevent - having knowledge that any of the wrongs conspired to be done was about to be committed, and having the power to prevent or aid in the preventing of such criminal acts; however, neglected or refused to do so.

VI. UNLAWFUL ENTRY/FORCIBLE ACTIONS:

Unlawful Entry - (1) The crime of entering another's real property, by fraud or other illegal means, without the owner's consent.

Forcible - Effected by force or threat of force against opposition or resistance.

Forcible Detainer - (1) The wrongful retention of possession of property by one originally in lawful possession, often with threats or actual use of violence.

Forcible Entry and Detainer - (1) The act of violently taking and keeping possession of lands and tenements without legal authority. (2) A quick and simple legal proceeding for regaining possession of real property from someone who has wrongfully taken, or refused to surrender, possession.

Forcible Entry - (1) The act or an instance of violently and unlawfully taking possession of lands and tenements against the will of those in lawful possession. (2) The act of entering land in another's possession by the use of force against another or by breaking into the premises.

PRESS RELEASE ANNA LOUISE INN SCANDAL



ANNA LOUISE INN vs. DENISE NEWSOME (Hamilton County Municipal Court Case No. 14-cv-11786)

This is **NOT** a simple Eviction action. There is more to this story that meets the eyes and involves **DEEP Pockets, CROOKED Politicians and CROOKED Judges**. Go to the following LINK below that has been set up to POST documents in the "**ANNA LOUISE INN SCANDAL!**" See **HOW** the Anna Louise Inn goes about the **EMBEZZLEMENT of monies for Rental Payments from their tenants** and then goes about filing EVICTION actions for purposes of HIDING its CRIMES! It appears that this has been a **LONGSTANDING practice** in which **MANY . . . MANY . . . MANY . . .** of the Anna Louise Inn's Tenants have been **VICTIMIZED** and subjected to **CRIMINAL EVICTIONS** – i.e. **FRAUD COMMITTED UPON THE COURTS** for purposes of **STEALING** Rental Payments!

<http://www.slideshare.net/VogelDenise/anna-louise-inn-scandal-more-barack-obamadrama> -

Incorporated by reference as if set forth in full herein.

1. As a matter of law, certain of the person(s)/conspirator(s) (i.e. for instance MacConnell, Stanley, Richards, Garvey, Casey, West, Russell, Locksmith, John/Jane Does) - to be determined through the investigation of this Complaint, unlawfully entered Newsome's residence located at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202. Therefore, Newsome is requesting through this instant Complaint that an investigation into the claims and allegations set forth herein and that those found to have acted in such unlawful/illegal manner be prosecuted and indicted for said legal wrongs.

2. Certain person(s)/conspirator(s) committed crime of entering Newsome's residence **by fraud**, other illegal means and **without** Newsome's consent. Prior to entering, certain person(s)/conspirator(s) knew and/or should have known that they were committing a crime/felony; however, **elected to participate** in the actual crime itself and/or **the allowance** of the crime in which they could have prevented.

3. **The taking** of Newsome's residence being **by force** and excelled to the vandalizing of Newsome's residence to obtain access and destroy her property/possession and evidence.

4. Newsome was subjected to the violent taking and keeping of certain property/possessions without legal authority.

5. Newsome was subjected to the unlawful entry of her residence by the use of **excessive force** and the **breaking into** her residence.

6. ALI parties, their attorneys, Judges **KNEW** and/or should have known that such acts they were engaging in being Unlawful/Illegal Entry and Forcible Actions; nevertheless, they made a conscious, deliberate and willful decision to allow said crimes to be committed of and against Newsome.

7. ALI parties, their attorneys, Judges knew that such acts were criminal, nevertheless, they made a **conscious**, deliberate and **willful** decision to allow said crimes to be committed of and against Newsome.

8. Newsome through the filing of this instant Complaint seeks an investigation and the prosecution and indictment of person(s)/conspirator(s) found through said investigation to be guilty of the unlawful/illegal entry and forcible acts and/or their participation in such crimes against Newsome's property/possessions. Moreover, all person(s)/conspirator(s) that knew and/or had knowledge that said crime(s) was about to be committed and/or being committed and did nothing to prevent - having knowledge that any of the wrongs conspired to be done was about to be committed, and having the power to prevent or aid in the preventing of such criminal acts; however, neglected or refused to do so.

VII. OBSTRUCTION OF JUSTICE/PROCESS:

Obstruction of Justice - Interference with the orderly administration of law and justice, as by giving false information to or withholding evidence from a police officer or prosecutor, or by harming or intimidating a witness or juror. *Obstruction of justice is a crime in most jurisdictions.

Obstruction of Process - Interference of any kind the lawful service or execution of a writ, warrant, or other process. *Most jurisdictions make this offense a crime.

1. Newsome files this instant Complaint and request an investigation to determine whether there has been an obstruction of justice in the carrying out and/or commission of the criminal actions of person(s)/conspirator(s) of and against Newsome. Furthermore, whether person(s)/conspirator(s) interfered with the orderly administration of law and justice, as by giving false information, acting without legal authority, bribery, withholding evidence, **tampering** and/or **obstructing** service of process, withholding evidence from those they engaged to carry out criminal acts on their behalf, furthering the subjection of Newsome to harm/injury, harassment, threats, intimidation, humiliation, discrimination, prejudices, deprivation of protected rights, etc. for her election to exercise her rights under the Constitution, Civil Rights Act and other governing statutes/laws.

2. **Obstruction of Process** – Investigation(s) into the handling of the Writ of Execution for Eviction and/or document certain person(s)/conspirator(s) relied upon on or about June 30, 2014, to commit the crimes rendered against Newsome. Moreover, to determine whether there was an **obstruction of process** wherein certain persons(s)/conspirator(s) interfered with service and/or obtained an unlawful/illegal Writ of Execution for Eviction and/or the document they relied upon to have Newsome unlawfully/illegally removed from her residence. Furthermore, whether said handling of process was in compliance with the statutes/laws governing said matters. Whether said process was handled in a manner **to deliberately**, willfully and **maliciously** deprive Newsome equal protection of the laws and due process of laws. Whether said process was handled in a manner to infringe upon the protected rights of Newsome.

Burnett v. Motorists Mut. Ins. Co., 2008 -Ohio- 2751(Ohio,2008) - The **Equal Protection** Clauses of the Federal and State Constitutions require that individuals be treated in a manner similar to others in like circumstances.

E. Liverpool Edn. Assn. v. E. Liverpool City School Dist. Bd. of Edn., 2008 -Ohio- 3327 (Ohio.App.7.Dist.Columbiana.Co.,2008) - **Equal Protection** Clause does not prevent all classification; it simply forbids laws that treat persons differently when they are otherwise alike in all relevant respects.

Columbia Gas Transm. Corp. v. Levin, 882 N.E.2d 400 (Ohio,2008 - **Equal Protection** Clauses of state and federal constitutions require that all similarly situated individuals be treated in a similar manner.

Discount Cellular, Inc. v. Pub. Util. Comm., 859 N.E.2d 957 (Ohio,2007) - State and federal **equal protection** clauses require that all similarly situated individuals be treated in a similar manner.

3. **False Pretense** - Investigation into whether a crime was committed through false pretenses - for the purpose of fraud and knowingly obtaining Newsome's residence/property by **misrepresenting the facts**, clearly violating statutes/laws made known to certain person(s)/conspirator(s), that give them sufficient notice that they were acting in violation of statutes/laws and that said actions were criminal in nature. Therefore, Newsome is requesting through this instant Complaint that an investigation into the claims and allegations set forth herein and that those found to have acted in such unlawful/illegal manner be prosecuted and indicted for said legal wrongs.

4. Newsome through the filing of this instant Complaint seeks an investigation and the prosecution and indictment of person(s)/conspirator(s) found through said investigation to be guilty of obstructing justice and/or their participation in such obstruction of justice set forth in this instant Complaint against Newsome. Moreover, all person(s)/conspirator(s) that knew and/or had knowledge that said justice was being obstructed through criminal acts and/or behavior and did nothing to prevent - having knowledge that any of the wrongs conspired to be done was about to be committed, and having the power to prevent or aid in the preventing of such criminal acts; however, neglected or refused to do so.

VIII. **COLOR OF LAW:**

The appearance of semblance, without the substance, of a legal right.

*The term u.s.u. implies a misuse of power made possible because the wrongdoer is clothed with the authority of the state.

1. Through this instant Complaint, Newsome request that an investigation be had to determine whether certain person(s)/conspirator(s) (i.e. for instance MacConnell, Stanley, Richards, Garvey, Casey, West, Russell, Locksmith, John/Jane Does - to be determined through investigation) acting under color of law, misused, abused, usurped, etc. their authority/power for purposes of subjecting Newsome to criminal actions. Moreover, whether those acting under color of law knew and/or should have known they were committing criminal acts and lacked jurisdiction and/or authority to proceed in the manner in which they did. Newsome further

seeks through this Complaint that an investigation be had to determine whether certain person(s)/conspirator(s) acting under color of law acted with malice, corrupt motive, ill intent, discrimination, prejudices, etc. towards Newsome for her exercising rights secured/guaranteed under the Constitution and/or statutes/laws governing the matters before them. If any such criminal violations and/or acts are found by those acting under color of law, that said person(s)/conspirator(s) be prosecuted and indicted in accordance with the statutes/laws governing such criminal wrongs and injustices.

IX. CONSPIRACY AGAINST RIGHTS:

1. Newsome requests through the filing of this instant Complaint and investigations as to whether or not there has been a conspiracy against her rights pursuant to 18 U.S.C. § 241. Conspiracy Against Rights:

If **two or more** persons *conspire to injure, oppress, threaten, or intimidate any person* in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or

If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured—

They shall be fined under this title or imprisoned **not more than ten years, or both**; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.

If so, Newsome through the filing of this instant Complaint and investigation seeks the prosecution and indictment of person(s)/conspirator(s) found through said investigation to be guilty of **conspiracy against rights**. Moreover, all person(s)/conspirator(s) that knew and/or had knowledge that said conspiracy was being committed and did nothing to prevent - having knowledge that any of the wrongs conspired to be done was about to be committed, and having the power to prevent or aid in the preventing of such criminal acts; however, neglected or refused to do so.

X. CONSPIRACY TO INTERFERE WITH CIVIL RIGHTS:

1. Newsome requests through the filing of this instant Complaint and investigations as to whether or not there has been a conspiracy against her rights pursuant to 42 U.S.C. § 1985 and/or applicable statutes/laws governing said matters. **Conspiracy to Interfere With Civil Rights:**

(2) Obstructing justice; intimidating party, witness, or juror:

If two or more persons in any State or Territory conspire to deter, by force, intimidation, or threat, any party or witness in any court of the United States from attending such court, or from testifying to any matter pending therein, freely, fully, and truthfully, or to injure such party or witness in his person or property on account of his having so attended or testified, or to influence the verdict, presentment, or indictment of any grand or petit juror in any such court, or to injure such juror in his person or property on account of any verdict, presentment, or indictment lawfully assented to by him, or of his being or having been such juror; or if two or more persons conspire for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws;

(3) Depriving persons of rights or privileges:

If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force, intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or

privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators.

Moreover, whether there was a conspiracy to (1) deprive Newsome of protected rights; (2) injure, oppress, threaten, or intimidate Newsome who had an apartment in the State of Ohio, County of Hamilton, City of Cincinnati in the free exercise or enjoyment of protected rights or privileges secured by her under the Constitution and laws of the United States, or because of her so exercising her right to seek justice for the wrongs complained of in lawsuit and/or actions brought by her. (3) whether person(s)/conspirator(s) went into the residence of Newsome with intent to prevent or hinder her from the free exercise or enjoyment of her residence and exercise of right or privilege to live in a place of her choice. Moreover, whether ALI parties, their counsel, Judges and others engaged in criminal activities to force Newsome to abandon her residence and deprive her rights secured under the Fair Housing Act.

If so, Newsome through the filing of this instant Complaint and investigation seeks the prosecution and indictment of person(s)/conspirator(s) found through said investigation to be guilty of conspiracy against rights. Moreover, all person(s)/conspirator(s) that knew and/or had knowledge that said conspiracy was being committed and did nothing to prevent - having knowledge that any of the wrongs conspired to be done was about to be committed, and having the power to prevent or aid in the preventing of such criminal acts; however, neglected or refused to do so..

XI. POWER/FAILURE TO PREVENT:

1. Newsome requests through the filing of this instant Complaint and investigations as to whether or not there has been negligence to prevent the crime and/or criminal actions taken against her pursuant to 42 USC § 1986 and/or applicable statutes laws governing said matters:

Every person who, having knowledge that any of the wrongs conspired to be done, and mentioned in section 1985 of this title, are about to be committed, *and having **power to prevent or aid in preventing** the commission of the same, **neglects or refuses so to do**, if such wrongful act be committed, **shall be liable to the party injured**, or his legal representatives, **for all damages caused by such wrongful act**, which such person by reasonable diligence could have prevented; and such damages may be recovered in an action on the case; and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in the action; . . .*

Moreover, whether person(s)/conspirator(s) had knowledge of any of the criminal actions committed and/or to be committed by each other, and having the power to prevent or aid in the prevention of the commission of such crimes, neglected or refused to do so. If so, Newsome is requesting that said person(s)/conspirator(s) be prosecuted and indicted from any and/or all criminal wrongs rendered Newsome.

XII. FACTS PERTINENT TO UNDERSTANDING CLAIMS/ALLEGATIONS:

1. On or about **May 29, 2014**, Vogel Denise Newsome checked the Hamilton County (Ohio) Municipal Court Docket and discovered that Anna Louise Inn had filed an Eviction action against her. See **Notice Of Intent To File Counter-Complaint. . .** Pleading - documents that were filed in the Hamilton County (Ohio) Municipal Court at Civil Action No. 14-CV-11786.

2. While Ohio statutes/laws are CLEAR in the litigation of Eviction actions that Newsome is to be served via mail (i.e. in that ALI having KNOWLEDGE that she was in the State of Mississippi at the time of filing); ALI as well as the Hamilton County (Ohio) Municipal Court's Clerk of Court (Tracy Winkler) did KNOWINGLY fail to serve Newsome with SERVICE OF PROCESS of the ALI Eviction. Therefore, due to said FAILURE "LACKED Jurisdiction" to litigate ALI's Eviction action.

1923.06 Summons - service of process.

(A) Any summons in an action, including a claim for possession, pursuant to this chapter shall be issued, be in the form specified, and be served and returned as provided in this section. Such service shall be at least seven days before the day set for trial.

(B) Every summons issued under this section to recover residential premises shall contain the following language printed in a conspicuous manner: "A complaint to evict you has been filed with this court. No person shall be evicted unless the person's right to possession has ended and no person shall be evicted in retaliation for the exercise of the person's lawful rights. If you are depositing rent with the clerk of this court you shall continue to deposit such rent until the time of the court hearing. The failure to continue to deposit such rent may result in your eviction. You may request a trial by jury. You have the right to seek legal assistance. If you cannot afford a lawyer, you may contact your local legal aid or legal service office. If none is available, you may contact your local bar association."

(C) The clerk of the court in which a complaint to evict is filed shall mail any summons by ordinary mail, along with a copy of the complaint, document, or other process to be served, to the defendant at the address set forth in the caption of the summons and to any address set forth in any written instructions furnished to the clerk. The mailing shall be evidenced by a certificate of mailing which the clerk shall complete and file.

In addition to this ordinary mail service, the clerk also shall cause service of that process to be completed under either of the following:

(1) Division (D) or (E) of this section or both, depending upon which of those two methods of service is requested by the plaintiff upon filing the complaint to evict;

3. Record evidence supports NOT ONLY ALI's KNOWLEDGE of Newsome being out-of-state at the time of filing of its Eviction action against Newsome, but ALI's MAILING of correspondence to Newsome out-of-state as well as a "CHANGE OF ADDRESS" notification provided by Newsome to ALI/Stanley.

4. The record evidence will support that Newsome filed "*Notice Of Change Of Address*" in the ALI Eviction action - See "*Request Court 'Update' Case Schedules Of The Docket. . .*" - documents that were filed in the Hamilton County (Ohio) Municipal Court at Civil Action No. 14-CV-11786.

JURISDICTIONAL ISSUES

5. ALI Parties were timely, properly and adequately advised that Eviction action against Newsome was unlawful/illegal and provided with ample time to have said FRIVOLOUS Eviction Action REMOVED from the Hamilton County (Ohio) Municipal Court; however, refused to do so and to date continues to act upon such malicious filing and with criminal intent. The record of the Hamilton County (Ohio) Municipal Court is aware of the unlawful/illegal and criminal actions of ALI Parties and their counsel; however, elected not to correct such unlawful/illegal actions brought to their attention by Newsome.

6. ALI Parties, their counsel and the Judges/Magistrates (Russell, West, Casey. . .) were timely, properly and adequately placed on notice through the pleadings filed by Newsome, that Judge(s)/Magistrate(s) **LACKED jurisdiction** over Newsome and the subject-matter in the Eviction action initiated by the ALI Parties and Richards. Ohio laws are clear on this issue.

7. The record evidence in the Hamilton County (Ohio) Municipal Court action will support that Judge(s)/Magistrate(s) engaging in ALI's Eviction action were timely, properly and adequately placed on notice through the pleadings filed by Newsome that when a judge/magistrate and/or Public Official acts without jurisdiction, any defense of IMMUNITY is **null/void** and cannot and **will not** sustain their actions or claim of immunity. Moreover, for said Judge/Magistrate and/or Public Official to act contrary to the laws **upon being notified** and acting **without** jurisdiction, affords said Judge(s)/Magistrate(s) and/or Public Official(s) to be sued in their individual capacity and be subject to criminal and civil actions filed against them. Ohio laws are clear on this issue:

OHIO COURTS:

Lynch v. Johnson, 420 F.2d 818 (1970) - Defense of judicial immunity is a very broad one **but it does not** afford any protection to judge **acting in clear absence** of jurisdiction nor does it protect him in nonjudicial activities.

Hollon v. Lilly, 38 S.W. 878 (1897) - A judge acting within his jurisdiction, is not liable to a suit for damages, however illegal or erroneous his acts may be, in the absence of a malicious or corrupt motive.

Reed v. Taylor, 78 S.W. 892 (1904) - While a judicial officer will be protected against suits for damages resulting from erroneous judgment, yet where he acts maliciously, or beyond his jurisdiction, his office is no protection.

Allsup v. Knox, 508 F.Supp. 57 (1980) - A judge will not be deprived of immunity because action he took was in error, was done maliciously, or was in excess of his authority; rather, he will be subject to liability only when he has acted in a clear absence of all jurisdiction.

King v. Cawood, 3 S.W.2d 616 (1928) - Judge acting illegally and without jurisdiction becomes **trespasser** and is liable.

8. Judge(s)/Magistrate(s) and/or Public Official(s) in the handling of the ALI Eviction action against Newsome do so WITH KNOWLEDGE they were acting WITHOUT and/or CLEAR ABSENCE of Jurisdiction.

9. Judge(s)/Magistrate(s) and/or Public Official(s) in the handling of the ALI Eviction action against Newsome did KNOWINGLY act ILLEGALLY and WITHOUT Jurisdiction; thus, becoming TRESPASSER(S) and, therefore LIABLE! May the Judge(s)/Magistrate(s) and/or Public Official(s) REAP from what he/she HAS SOWN through such criminal, malicious, vindictive and corrupt, etc. practices.



<http://www.slideshare.net/VogelDenise/070714-obama-fraud-gate-connection-to-the-anna-louise-inn-eviction-scandal-36698826> - Incorporated by reference as if set forth in full herein.

10. Newsome request investigation(s) into Judge's/Magistrate's handling of said matters to determine if he/she were **motivated to commit** such crimes, **participate** in such crimes and/or **authorize the carrying out** of such crimes against Newsome which was actuated by *malice, corruption, impure motives, discrimination, prejudices, ill intent*, etc. If so, Newsome seeks that said Judge(s)/Magistrate(s) be prosecuted and indicted in accordance with the statute/laws governing said matters. Neither Judge/Magistrate in the ALI Eviction action against Newsome can assert IMMUNITY in that they were acting without jurisdiction and the

evidence will support that they conspired with other person(s)/conspirator(s) to commit the criminal actions complained of herein or is to be made known through an investigation into the claims/allegations of the Complaint.

Bryant v. Crossland, 182 Ky. 556, 1918 Ky. LEXIS 403 - **HN3** - . . . This principle, however, **does not** extend to make a judicial officer immune from damages for illegal acts, which result in injuries to others or deprive them of their legal rights, when his acts are without the scope and limits of his jurisdiction. It follows that if his illegal acts are without the scope and limits of his jurisdiction, **he is liable**, if damages result to others from such acts, whether he is **actuated by malice, corrupt** and impure **motives** or not. In the last state of case, the fact that his **motives** are impure and bad are considered, only, as aggravating the damages. When the judge acts illegally, without the limits of his jurisdiction, he becomes a trespasser, and is liable in damages as such. Also see, *Cox v. Perkins*, 299 Ky. 470, 1945 Ky. LEXIS 449 at **HN4**; *King v. Cawood*, 223 Ky. 291, 1928 Ky. LEXIS 317 at **HN1**.

Liability of Judges: *Pepper v. Mayes*, 81 Ky. 673, 1884 Ky. LEXIS 29 – HN 2: Where a judicial officer has **jurisdiction of the person** and of the **subject-matter** he is **exempt** from suit by a **private individuals** for damages so long as he acts within his jurisdiction and in a **judicial capacity**. **HN3** - Whenever the State of Kentucky **confers** judicial powers upon an individual, it **confers** them with full **immunity** from private suits. In effect, the State says to the officer that these duties are **confided** to his judgment; that he is to exercise his judgment fully, **freely**, and without favor, and he may exercise it without fear; that the duties concern individuals, but they concern more especially the welfare of the State and the peace and **happiness** of society; that if he shall fail in a faithful discharge of them he shall be called to account as a criminal. . . . Also see *McBurnie v. Sullivan*, 152 Ky. 686, 1913 Ky. LEXIS 698 at **HN4**.

McBurnie v. Sullivan, 152 Ky. 686, 1913 Ky. LEXIS 698 at **HN5**: There are *two* distinct classes of cases to which the principle of judicial protection does not apply: **First**, where a person having special or limited judicial authority does any act beyond the scope of his authority. **Second**, where, although acting within the limits of his jurisdiction, he is actuated by malice or corrupt motives. The rule not only applies to the highest judge in the state or nation, but it also applies to the lowest officer who sits as a court and tries petty causes, and **it applies** not in respect to their judgments merely, but to all processes awarded by them for carrying their judgments into effect.

Ayars v. Cox, 73 Ky. 201, 1874 Ky. LEXIS 30 -**HN4** - . . . There are two distinct classes of cases to which that principle of judicial protection does not apply: first, where a person having a special or limited **judicial authority** does any act beyond the scope of his authority; and secondly, where, although acting within the limits of his jurisdiction, he is **actuated** by malicious or **corrupt motives**. In either case the judge or magistrate renders himself liable as a trespasser to the party injured. Also see, *Revill v. Pettit*, 60 Ky. 314, 1860 Ky. LEXIS 82 at **HN6**.

Henry v. Commonwealth, 126 Ky. 357, 1907 Ky. LEXIS 52 - **HN9** - A judicial officer, from the highest to the **lowest** grade, . . . an officer exercising . . . power is not punishable for any honest mistake of judgment in the exercise of that power, but only for an abuse of his power in proceeding from a **corrupt** or other improper motive.

Stephens v. Wilson, 115 Ky. 27, 1903 Ky. LEXIS 67 - **HN5** - If an officer executes a warrant of arrest, invalid on its face, he is liable in damages for false imprisonment. Where, therefore, it appears on the face of the process that the magistrate issuing it has not **jurisdiction of the person** of the plaintiff or the **subject-matter** of the suit, the officer executing it is a trespasser, and is liable in action for damage for false imprisonment. It has been said, indeed, that an officer is bound, or will be presumed, to know the jurisdiction of the court, whose officer he is, and that, if he acts in obedience to a precept which the court has no jurisdiction to issue, he will not be protected in false imprisonment. **HN6** - Where an inferior court has no jurisdiction of the **subject-matter**, or, having it, has not **jurisdiction of the person** of the defendant, all its proceedings are absolutely void. Neither the members of the court nor the plaintiff (if he procured or assented to the proceedings) can derive any protection from them, when prosecuted by a party aggrieved thereby. If a mere ministerial officer executes any process, upon the face of which it appears that the court which issued it had not jurisdiction of the **subject-matter**, or of the person against whom it is directed, such process will afford him no protection for acts done under it.

11. On or about June 25, 2014, the Judge with KNOWLEDGE that she/he as well as the Hamilton County (Ohio) Municipal Court LACKED JURISDICTION to litigate ALI's Eviction action due to the FACT and KNOWLEDGE that "Service of Process" **had NOT** been perfected and Newsome **had NOT** been SERVED with Service of Process at the address KNOWN and given to ALI, proceeded to execute and file Writ of Execution for Eviction. See **June 23, 2014 Court LACKS Jurisdiction**. . .Pleading - documents that were filed in the Hamilton County (Ohio) Municipal Court at Civil Action No. 14-CV-11786.

12. On or about June 30, 2015, ALI Parties conspired, engaged and solicited Hamilton County (Ohio) Municipal Court Deputy Bailiff/Garvey to enforce Writ of Execution of Eviction and/or document relied upon to have Newsome unlawfully/illegally removed from her apartment at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 39202. A reasonable mind may conclude that Judge Russell conspired with other Judge(s)/Magistrate(s) engaging in ALI's Eviction action as well as ALI Parties and their attorney(s) to proceed to unlawfully/illegally take Newsome's apartment away from her.

13. Judge Russell doing so with FULL KNOWLEDGE and Court documents to sustain that there was a *legal and binding* **VERBAL AGREEMENT** regarding payment of rent between ALI and Newsome; which along with the LACK OF JURISDICTION that precluded ALI and their representatives from removing and/or evicting Newsome.

14. Judge Russell doing so with FULL KNOWLEDGE of the LACK OF JURISDICTION as well as the "BINDING VERBAL AGREEMENT" of the Rental Payment Terms between ALI/Stanley and Newsome. Moreover, at the time of the June 30, 2014, UNLAWFUL/ILLEGAL Eviction, Newsome was current in Rental Payments in accordance with the BINDING VERBAL AGREEMENT entered into with ALI/Stanley. Nevertheless, ALI as well as the Hamilton County (Ohio) Municipal Court REJECTED payments – i.e. returning them Rental Payments to Newsome.

15. Newsome believes an investigation will yield that Judge(s)/Magistrate(s) engaging in the ALI Eviction action against Newsome, did so WITH KNOWLEDGE that they lacked jurisdiction to act and/or execute any Orders and/or Warrants. Nevertheless, conspired with ALI, their counsel and others to unlawfully/illegal obtain Newsome's residence and/or property. See **Before The Honorable Judge Heather Russell**. . . Pleading - documents that were filed in the Hamilton County (Ohio) Municipal Court at Civil Action No. 14-CV-11786.

16. On or about June 30, 2014, Party(s)/Conspirator(s) carried out an unlawful/illegal Eviction against Newsome. Thus, by engaging in said unlawful/illegal Eviction, did KNOWINGLY, WILLINGLY with MALICIOUS and CORRUPT INTENT, etc. commit the criminal acts set forth in this instant complaint.

17. The actions ALI Parties and/or party(s)/conspirator(s) in this instant complaint was willful, malicious and wanton and done with the purposes of causing Newsome injury/harm.

18. Newsome files this instant Complaint and Request for Investigation(s) in good faith in that she seeks vindication and justice for the criminal and civil wrongs rendered her.

19. Newsome reserves the right to reserve and amend this instant Complaint in that it has been prepared under duress and for purposes of expedition to see that the proper government authority has been timely, properly and adequately notified of the criminal activities of person(s)/conspirator(s).

REQUEST TO BE NOTIFIED OF CONFLICT-OF-INTERESTS

NOTICE IS HEREBY GIVEN: Vogel Denise Newsome is requesting to be NOTIFIED of ALL Conflict-Of-Interest (if existing) in the Federal Bureau of Investigation handling of this Criminal Complaint as it relates to Party(s)/Conspirator(s) listed above.

Under the statutes/laws governing said matters, Newsome specifically DEMANDS that the Federal Bureau Of Investigation advise of its relationship (if at all) with the Law Firm of Baker Donelson Bearman Caldwell & Berkowitz – i.e. there is evidence to support concerns of Conflict-Of-Interests; moreover, the FBI's FAILURE to ACT on the Criminal Complaint(s) Newsome files with said Agency. Thus, the statutes/laws are clear that it appears that the FBI is AIDING and ABETTING Baker Donelson and its Conspirators/Co-Conspirators in the CRIMINAL and Civil violations leveled AGAINST Vogel Denise Newsome, and, further USING the Office of the Federal Government as the Federal Bureau of Investigation in the COMMISSION of said Crimes and Civil violations AGAINST Newsome – i.e. the following links are incorporated by reference as if set forth in full herein.

W. LEE RAWLS



W. Lee Rawls
Baker Donelson

SENIOR Counsel/CHIEF OF STAFF to Federal Bureau of Investigation Director **Robert Mueller**.

Assistant Attorney General for Office of Legislative Affairs. Administrative Assistant/Legislative Director for Senator Pete V. Domenici. Staff Member for the Senate Committee on Environment and Public Works. Legislative Specialist Office of Legislation and Subcommittee Director for

Senator Howard H. Baker for the Environmental Protection Agency. Chief of Staff for Senator William "Bill" Frist. **MANAGING PARTNER** -

Baker Donelson Bearman Caldwell & Berkowitz.



FBI Director Robert Mueller & U.S. President Barack Obama

As of 06/29/15:

<http://www.washingtonpost.com/wp-dyn/content/article/2010/12/11/AR2010121102393.html>

<http://www.slideshare.net/VogelDenise/rawls-w-lee-baker-donelsonemployeesenior-counsel-to-fbi>

<http://www.slideshare.net/VogelDenise/rawls-w-lee-ties-to-baker-donelson>

<http://www.slideshare.net/VogelDenise/rawls-w-lee-fbi-baker-donelson>

U.S. v. Jimenez Recio, 123 S.Ct. 819 (2003) -
Essence of a conspiracy is an agreement to commit an unlawful act.

Agreement to commit an unlawful act, which constitutes the essence of a conspiracy, *is a distinct evil* that may exist and be punished whether or not the substantive crime ensues. *Id.*

Conspiracy *poses a threat to the public* over and above the threat of the commission of the relevant substantive crime, both because *the combination in crime makes more likely the commission of other crimes* and because it *decreases the probability that the individuals involved will depart from their path of criminality*. *Id.*

PLEASE TAKE NOTICE: The Public/World has the right to KNOW through this instant Criminal Complaint, “HOW” and “WHY” the United States Department of Justice **TURNED OVER** its power and control to the *KLAN’S Law Firm of Baker Donelson Bearman Caldwell & Berkowitz PC*



and those with whom its attorneys/laws CONSPIRE for purposes of engaging in the Criminal

and Civil violations leveled AGAINST Vogel Denise Newsome? Not only that, “**HOW**” and “**WHY**” Baker Donelson has been given **FULL RIGHTS** and **ACCESS** for purposes of **CARRYING OUT** Domestic as well as International **TERRORIST attacks** of and against Vogel Denise Newsome, other Citizens of the United States of America as well as on Foreign Nations and their Citizens **through the USE** of the United States Department of Justice – i.e. specifically, Federal Bureau of Investigation, Central Intelligence Agency. . . – United States Military, as well as State/City Governments etc.?





Moreover, “HOW” and “WHY” have Baker Donelson and its Conspirators/Co-Conspirators have been given “FULL CONTROL” of the United States of America’s JUDICIAL SYSTEM for purposes of FURTHERING and COVERING-UP its RACIST and RACIAL prejudices

AGAINST People of Color in the **UNLAWFUL/ILLEGAL** use of **“SECRET Grand Juries”** under the **“DESPOTISM-Style Government”** it and its *Conspirators/Co-Conspirators* are attempting to set up *UNDER the MASK/GUISE of Democracy?* Furthermore, **“HOW”** and **“WHY”** was the Law Firm of Baker Donelson Bearman Caldwell & Berkowitz **ALLOWED to HIJACK the “JUDICIAL SYSTEM”** and **IMPLEMENT Oligarchy-Style Courts** – i.e. such as the SUPREME COURT Of The United States [CONSISTING of ONLY **“JEWISH”** and **“CATHOLIC”** Justices] and then USE said Court(s) to **FURTHER their RACIST and RELIGIOUS ATTACKS** on People-Of-Color and other **FAITHS** – i.e. **STUPID** enough for some reason that the Supreme Court of the United States decision for instance on **FRIDAY, June 26, 2015** regarding **MARRIAGE EQUALITY** and



ObamaCare/The Affordable Care Act are **BINDING** and **ENFORCEABLE** when they **ARE NOT!**



Then **USING** the JEWISH-Controlled Media Networks and their **STAGED Performers** who appears were **PRE-NOTIFIED** of the Decision that would be rendered to FLOOD the Television Networks, and other Media Sources with such **FOOLISHNESS** rather than report the **TRUTH**:





Got Good Health Care?

Let me cure that for you.

MATTHEW 24:24(b)

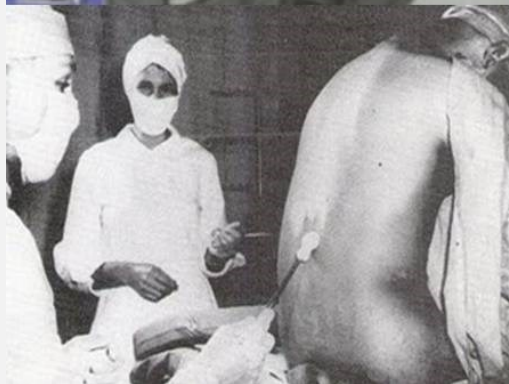
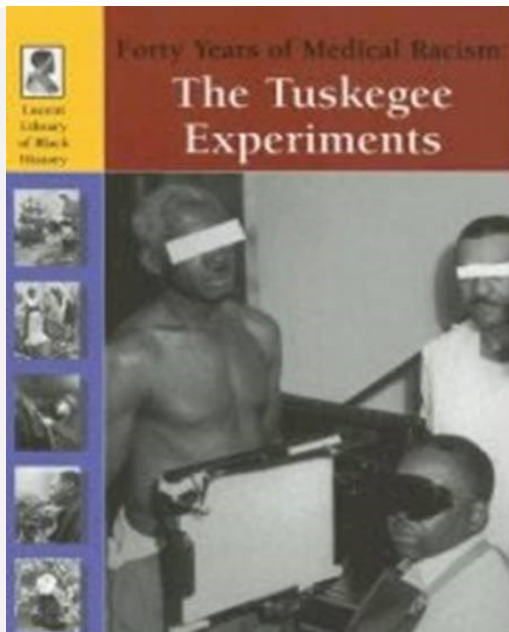
²⁴For... **IF** it were possible, they shall deceive the very elect.

Is this the
CHANGE
Citizens voted for?

HEALTH CARE REFORM

The **JOKE/LAUGH** may be on YOU!!
Obama is willing to **GAMBLE** with your life and **sell out** to the highest bidder for a few pieces of silver!

ASK YOURSELF: **WHY THE RUSH/HURRY** – **WHAT IS OBAMA HIDING not SAYING!!**



- The Company BEHIND such RACIST and GENOCIDE practices appears was NONE OTHER than Proctor & Gamble: The following links are incorporated by reference as if set forth in full herein: See

Clarence Gamble Information:

<http://www.slideshare.net/VogelDenise/gamble-clarence-proctor-gamble-sterilization-wiki-info>

<http://www.slideshare.net/VogelDenise/patfinder-international-wiki-info>

Tuskegee Tests:

<http://www.slideshare.net/VogelDenise/tuskegee-tests>

Barack Obama's and Baker Donelson's HEALTH CARE PLAN:

<http://www.slideshare.net/VogelDenise/baker-donelson-health-care-plan-power-point>



United States INHUMANE Guatemala EXPERIMENTS:

<http://www.slideshare.net/VogelDenise/guatemala-experiments>

INJECTING Citizens of Pakistan with a **FAKE VACCINE** – i.e. who know what **POISONS** were injected; however, the United States Central Intelligence (“CIA”) was involved:

<http://www.slideshare.net/VogelDenise/pakistan-us-inject-fake-vaccine2>

<http://www.slideshare.net/VogelDenise/pakistan-us-inject-fake-vaccine>

UNITED STATES PRESIDENT BARACK HUSSEIN OBAMA II



GENOCIDE PRACTICES in the
Sterilization/Gutting of People of Color:

<http://www.slideshare.net/VogelDenise/united-states-woman-speaks-out-about-being-sterilizedguttied-by-government>

<http://youtu.be/gDuGrN1pivE>

<http://youtu.be/8xkuDPD3A1Y>

<http://youtu.be/SI-68j-LLk4>

incorporated by reference as if set forth in full herein.



FindLaw FOR LEGAL PROFESSIONALS

United States Court of Appeals, Sixth Circuit.

ANDERSON v. PROCTER GAMBLE COMPANY

Marilyn ANDERSON, Plaintiff-Appellant, v. PROCTER & GAMBLE COMPANY;
The Procter & Gamble Disability Benefit Plan, Defendants-Appellees.

No. 99-5800.

– July 12, 2000

Before: RYAN and BOGGS, Circuit Judges; and DUGGAN, District Judge.*

Justin S. Gilbert (briefed), The Gilbert Firm, Jackson, Tennessee, for Plaintiff-Appellant. Janis Wild Kesser (briefed), Baker, Donelson, Bearman & Caldwell, Stephen D. Wakefield, Kullman, Inman, Bee, Downing & Banta, Memphis, Tennessee, for Defendants-Appellees.

OPINION

- ONE GUESS WHO'S LEGAL COUNSEL FOR PROCTER & GAMBLE. Yes, Baker Donelson Bearman Caldwell & Berkowitz.

See

<http://www.slideshare.net/VogelDenise/baker-donelson-anderson-vs-procter-gamble> incorporated by reference as if set forth in full herein.



Baker Donelson's HEALTH LAW:
<http://www.slideshare.net/VogelDenise/baker-donelson-health-law>
<http://www.slideshare.net/VogelDenise/baker-donelson-federal-health-policy-highlighted>

Just COINCIDENTALLY “FAILING” to REPORT the News that these Decisions were PURCHASED, ObamaCare (a/k/a Affordable Care Act) was DRAFTED by Baker Donelson Bearman Caldwell & Berkowitz – under the DESPOTISM-Styled Government - and NOT the United States of America’s CONGRESS! So NOW the United States of America’s Congressional Members (REPUBLICANS) are STAGING more DRAMA for such FOOLISHNESS when they have ALREADY been served with EVICTION to VACATE the Offices! In other words, attempting to ***SET THE GROUNDWORK to FORCE the Jews and Catholics BELIEFS and PRACTICES “DOWN THE THROATS” of other Religions or Citizens whose BELIEFS and FAITHS differ from that of the SUPREME COURT OF THE UNITED STATES’ Jewish and Catholic Justices!***

IMPORTANT TO NOTE: If the Law Firm of Baker Donelson and its JEWISH and CATHOLIC Counterparts believed in such June 26, 2015 Decisions, then they would NOT have had to pass such law under a DESPOTISM-Styled Government Regime and Court – Thus, AGAIN, making said ruling NULL and FULL and UNENFORCIBLE!

Flooding the MEDIA Networks/Airways with DISTRACTIONS so that the PUBLIC/WORLD will NOT see “HOW” and “WHY” the United States of America COLLAPSED under the DESPOTISM-Government Regime it and its Counterparts were “SECRETLY” trying to create! Let this be a LESSON learned as to WHY Monopolies are FORBIDDEN!



RELIEF SOUGHT

Newsome prays for the following relief:

- A. **Immediate** return of the residence at 300 Lytle Street – Apartment 313 – Cincinnati, Ohio 45202 be returned to Denise Newsome;
- B. **Immediate** issuance of Injunction, Restraining and Protective Order of and against Person(s)/Conspirator(s) and their legal representatives and/or representative from subjecting Newsome to any further criminal and civil wrongs;
- C. **Immediate** payment of \$15,000.00 to compensate Newsome for the replacement of stolen and damaged property/possession. Moreover, Newsome has suffered irreparable injury/harm and such criminal actions have had a mental, physical and emotional impact on her life and she should not be required to have to endure any more humiliation, frustration, exertion, etc. to try and determine where items are.
- D. Criminal prosecution of Person(s)/Conspirators and the proper indictment rendered for those who may be found guilty;
- E. Any and all other relief allowed under the statutes/laws governing said matters.

Respectfully submitted this 30th day of **June, 2015**.



Vogel Denise Newsome
Post Office Box 31265
Jackson, MS 39286
Phone: (513) 680-2922 or (601) 885-9536