

IN THE OHIO SUPREME COURT

WILLIAM DIXON,	:	
	:	CASE NO. 2019-0070
Relator,	:	
	:	
v.	:	
	:	
CLERK SANDY OPACICH,	:	
U.S.D.C. CLERK,	:	
	:	
Respondent.	:	

NOTICE OF FILING NOTICE OF REMOVAL

Respondent Sandy Opacich, Clerk, United States District Court for the Northern District of Ohio (hereinafter "Federal Respondent"), by and through their undersigned attorney, hereby give notice that on February 6, 2019, the Federal Respondent filed a Notice of Removal of this action in the Office of the Clerk of the United States District Court for the Southern District of Ohio in Columbus, Ohio. A copy of the Notice of Removal is attached hereto.

With this filing, this action now stands removed from the Ohio Supreme Court to the United States District Court for the Southern District of Ohio.

Respectfully submitted,

BENJAMIN C. GLASSMAN
United States Attorney

s/Leah M. Wolfe
LEAH M. WOLFE (0093299)
Assistant United States Attorneys
303 Marconi Blvd., Suite 200
Columbus, OH 43215
Office: (614) 469-5715 Fax: (614) 469-5240
E-mail: leah.wolfe@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2019 a copy of the foregoing *Notice of Filing Notice of Removal* was filed electronically. In addition, a copy was served by regular United States mail, postage prepaid, to:

William Dixon-Relator
529-169
P.O. Box 80033
2001 E Central Avenue
Toledo, OH 43608

/s Leah M. Wolfe
LEAH M. WOLFE (0093299)
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

WILLIAM DIXON,

Relator,

v.

CLERK SANDY OPACICH,
U.S.D.C. CLERK,

Respondent.

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:

CASE NO. 2:19-cv-0390

NOTICE OF REMOVAL

Respondent Sandy Opacich, Clerk of Court for the United States District Court for the Northern District of Ohio, by and through her undersigned attorney, respectfully states as follows:

1. The Federal Respondent is the respondent in the mandamus action *William Dixon v. Clerk Sandy Opacich, U.S.D.C. Clerk*, currently pending in the Ohio Supreme Court as Case No. 2019-0070. *See* docket attached hereto as Exhibit A. No hearing has been had in that action, and copies of all process, pleadings, and orders served upon the Federal Respondent in that action are attached to this Notice of Removal as Exhibit B.

2. The Federal Respondent was first served with a copy of the petition for writ of mandamus on January 24, 2019, and thirty days have not expired since receipt by the Federal Respondent of a copy of the initial pleading setting forth the claim for

relief upon which this proceeding is based.

3. Respondent Opacich is the Clerk of Court for the United States District Court for the Northern District of Ohio. Respondent Opacich is employed by the United States District Court for the Northern District of Ohio; she is being sued by the Relator for actions she took or refused to take while acting under the color of federal law and in the performance of her official duties.

4. The relator in the state court action seeks damages from the Federal Respondent for alleged violations of the Constitution of the United States. *See* Compl. in Mandamus, Ex. B, at pp. 1-4.

5. This action therefore is one arising under the Constitution and laws of the United States, and it is therefore an action over which the District Courts of the United States have original jurisdiction, pursuant to 28 U.S.C. § 1331. This action is removable pursuant to 28 U.S.C. §§ 1442(a)(1) and 1442(a)(3).

6. A federal officer is entitled to removal under 28 U.S.C. § 1442(a)(1) whenever a civil action or criminal prosecution is commenced against her for conduct “under color of [] office.” The “color of office” test is satisfied if there is a “causal connection” between the charged conduct and asserted official authority, and there is a “colorable defense” under federal law. *Mesa v. California*, 489 U.S. 121, 129 (1989); *Willingham v. Morgan*, 395 U.S. 402, 409 (1969).

7. In this case, there is a clear causal connection between the Federal Respondent’s official duties as a federal officer and the mandamus action. In addition, Respondent Opacich is immune from suit under the doctrine of qualified immunity.

Immunity is a federal defense that provides a basis for the removal of this action from the state court to this Court pursuant to 28 U.S.C. § 1442(a)(1). *See Mesa*, 489 U.S. at 133.

8. Officers of the Courts of the United States are also entitled to removal under 28 U.S.C. § 1442(a)(3) whenever criminal or civil actions are commenced against such officers “for or relating to any act under color of office or in the performance of [their] duties.”

9. In this case, Relator’s claims relate to Respondent Opacich in her capacity as Clerk for the Northern District of Ohio, where Relator has filed a separate federal case which remains pending. Therefore, the claims in this case relate to actions taken in the performance of Federal Respondent’s official duties, and Federal Respondent is entitled to removal pursuant to 28 U.S.C. § 1442(a)(3).

10. A copy of this Notice of Removal will be promptly filed with the Clerk of Courts of the Supreme Court of Ohio, which will effect the removal. *See* 28 U.S.C. § 1446(d).

Respectfully submitted,

BENJAMIN C. GLASSMAN
United States Attorney

s/Leah M. Wolfe
LEAH M. WOLFE (0093299)
Assistant United States Attorney
303 Marconi Blvd., Suite 200
Columbus, OH 43215
Office: (614) 469-5715
Fax: (614) 469-5240
E-mail: leah.wolfe@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2019, a copy of the foregoing *Notice of Removal* was filed electronically. Notice of this filing will be served upon all parties by operation of the Court's electronic filing system. In addition, a copy was served by regular United States mail, postage prepaid, to:

William Dixon-Relator
529-169
P.O. Box 80033
2001 E Central Avenue
Toledo, OH 43608

s/Leah M. Wolfe
LEAH M. WOLFE (0093299)
Assistant United States Attorney

THE SUPREME COURT OF OHIO

CASE DOCKET

William Dixon v. Clerk Sandy Opacich, U.S.D.C. Clerk

<u>Case Information</u>	Number	2019-0070
	Type	Original Action in Mandamus
	Date Filed	01/18/2019
	Status	Open

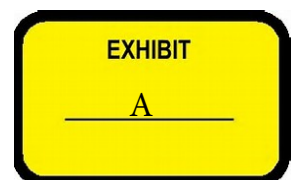
Parties

William Dixon; Relator
Pro Se

Sandy Opacich, U.S.D.C. Clerk; Respondent
Pro Se

<u>Docket</u>	Date Filed	Description	Filed By
	01/18/2019	Complaint in mandamus of William Dixon	Relator
	01/18/2019	Affidavit of indigence	Relator
	01/18/2019	Summons & complaint issued to respondent(s)	
	01/22/2019	Proof of mailing for Clerk Sandy Opacich; postage \$8.04	
	01/28/2019	Return receipt/service of summons & complaint; Clerk Sandy Opacich served on 1/24/2019	

End of Docket



Ohio supreme court

19-0070

William Dixon - Plaintiff
- vs -
relator

writ of mandamus

Clerk Sandy Opacich
U.S.D.C. Clerk
respondent

FILED
JAN 18 2019
CLERK OF COURT
SUPREME COURT OF OHIO

William Dixon - Plaintiff
579-169
TOCT - PO BOX 80033
2001 E Central Ave
Toledo, Ohio, 43608

Clerk Sandy Opacich respondent
U.S.D.C. Clerk
801 W Superior Ave
Cleveland, Ohio, 44113-1830
respondent

Now comes William Dixon pro-se to Ask The Ohio Supreme Court to step in, - History "2017" Dixon Filed a 1983 case # 2017-CV-1476 - The Court still has failed to make any order or response.

Dixon Filed Appendix (A-T) Evidence. The named Defendants in the law suite 1983, "Stole" All the Evidence. The Defendants also have continued to place Dixon in danger, stole all his property 4 times. The Defendants continue to violate Dixon's Civil Rights. - "Dixon" Had to Amend - The complaint in 2018 to add more violations.

RECEIVED
JAN 18 2019

EXHIBIT
B

The clerk And judge then used the 'Amend' As cause to ignore the complaint, so the Defendants could continue there violations.

The Defendants method's are to do so many violations it will overwhelm the case to cover up the more serious issues.

Nov. 2018 Dixon moved for "leave" to Ask the court for injunctive Relief And also to replace the (lost/stolen) file.

Dixon notified the clerk the Defendants stole the file, the file contains Notarized Affidavits of witnesses who witnessed a murder.

O.D.C. has let Law enforcement And the courts Assist them with covering up the murder. - Dixon contacted The F.B.I. And other Groups, They wanted copies of the files and a witness list, which the court won't release. - (The Defendants stole Dixon's copy.)

Memorandum

Now Comes William Dixon, I request leave to file injunctive relief, The clerk won't file the motion. The court and clerk. Both have avoided the lawsuit, Dixon filed 2 motions NOV. 2018, The clerk rejected to file both. Both^s was motion for leave. 1.) motion for leave to ask for injunctive relief through a protection order, 2.) motion for leave to ask the court to give Dixon a copy of the Evidence Appendix.

The clerk refused to file both, sent a letter asking for money for the file. Dixon don't have money to buy a file the named defendants purposely stole - see Attached Evidence for all these claims.

The injunctive relief wasn't even mention in the Return letter by the clerk. The clerk sent a copy of the judges order Dixon can't file without leave since the Amended Complaint. - which the clerk and court try to use the Amended Complaint As to why NO order has been made yet. But the case sat from (2017-until late 2018.) a full year.

(Relief - remedy for mandamas)

Dixon wants the Ohio Supreme Court to request the Clerk to file the (Injunctive Relief) - release a copy of the file, and Dixon needs someone to step in, How many Civil Rights Violations have to happen before the Courts hold the Government at fault. - The Defendants have denied all religious rights, stole property, killed an inmate, tried to kill Dixon and have placed Dixon in many harmful areas to be assaulted. The Defendants have repeatedly tried to get Dixon to "stop" trying to expose the murder at (M.C.I.) The Government has this method to cover up their criminal activity. They can do what they want, then make sure everyone ignores all evidence and facts. When people try to expose or threaten us, harm us, and try to kill us or make us shut up. We need eyes of truth on this.

Certificate Service
one true copy mailed to Clerk - Jan 10-18
4

United States District CourtWilliam Dixon Plaintiff
- vs -Warden Coleman et All
Defendants(Motion for leave to file)
Motion for Injunctive ReliefProtection order
(Document request)

Judge Helmick

Case # 2017-cv-1476

Pg 1-

now comes William Dixon pro-se to Ask for leave to file this motion for injunctive relief. i) Dixon will give Evidence for the motion, Attached. Named Defendant's Jones, Gillum, Norris, and Friend, - Heard Dixon make a 3-way call to F.B.I. The F.B.I. wanted All files for the claims Dixon was making. The Next Day. (Jones, Gillum, Norris, Friend,) Illegally locked Dixon up, stole his property, (Files) to prevent a copy to the F.B.I. (Friend) went after the citizen who was in society who set up the call with F.B.I. Gillum and Norris physically threaten Dixon. - so Dixon filed a Grievance About staff Doing this and stealing the file. Staff Gillum, Norris, Jones, Friend Denied stealing the file. yet (Staff Kaiser) documented they took the file and called it "stg" stuff. C/o Kaiser is the property C/o who was there to document and pack up Dixon's property. The camera and her testimony conflicts their's.

You will find (Grievance) # TOEF 0218000029 IN The Attached File pg 1-2, You find Kaiser Contraband Slip filed with property at pg 3. - (Note) The Defendant's claim they took nothing at all, yet cameras and ops say different -

Dixon asked for leave to get a copy of the file they stole, the clerk refused to file the motion for leave and asked Dixon to buy the file.

Dixon don't have money to replace what the Defendants steal. - Dixon IS going to move IN small claims, but they take (1 year) to pay out, The F.B.I. wants the file now, No one will listen without the file.

See clerk's Denial on pg 4 of file.

Next I was IN contact with (Ed. McDowell) - "Stg" friends, Bennett, Norris Gilman, Jones tried to say Dixon was IN a gang with McDowell, and Lane, - Dixon IS fighting the false "Stg" claims IN court, so Dixon asked them if they was IN a gang, and if they would testify. Dixon wrote a (letter) jay-pay to society to get addresses for the witnesses.

[Pg 2]

- Now Keep in mind Court - O.D.F.C. Has Dixon IN (High risk) High Level Gang Area, which could get Dixon killed, Because of The FALSE "Stg". Dixon was moved to P.C. protective custody, yet They moved Dixon IN a P.C. Block with Every Aryan Brotherhood IN P.C. The A.B. IS who tried to Kill Dixon, The cousin of The man who stabbed Dixon 9 Times lives IN The same Block as Dixon. - Dixon has Tried to locate Everyone "Stg" "Falsified" IN a report to claim They was Gang members. IN The same Gang as Dixon. Dixon Tried to Contact Them to get addresses ~~for~~ The court to Seperate Them. O.D.F.C. Lt. Bennette stole The out Gangmail.

They Refused to let Dixon mail The letter.

Nothing illegal IN The letter, just Trying to get Addresses And witnesses on my Behalf. (Stg)

Denied my Access to mail. see Grievances

Pg 5-6 - Dixon is requesting lie Detector's for all his witnesses, They All agree to take Them - saying (Stg) is lying -
Pg 3.

LOOK STAFF. Named Defendants, Refused to give me my (Religious Kosher meals) I file Paper work, They lose it, I file Grievances, They Claim They lost it, will fix it, I wait, 6 months, Again they lost it, I file a Grievance, They claim I should do the kite system, They admit they lost and failed to do 3 times, a full year of playing Games. - They use the same Chief Inspector Rieckle. (Rieckle) Denies all my claims, NO Review Ever, Since Rieckle is named in my 1983, I ask for someone else to investigate my claims, (NO Rieckle) Responds to The request. See pg 7-10 Grievances about my religious meals, - They stole 66 C.D.s from me, They was C.D.s That Translated the Bible english to Hebrew, Stole Them, Then they Denied my meals for 1 full year. over and over on purposes. See pg 11-13. Anti-semitic claims Because They purposely leave me without religious access. Deny me All my rights, Continue to let Rieckle investigate and put Aryan Anti-semitic's around me, staff Also do alot of Anti-semitic stuff.

Look Dixon (Remedy) —

Dixon Ask for injunctive Relief, Everyone IS Trying to keep the file away from Dixon, Dixon has tried to file in multiple place's They All ask for the Affidavit's, which the clerk has. so Dixon Needs the File. Next The Defendants still Try to get Dixon killed, They give Dope to Aryans and Tell them to Tell Everyone Dixon IS a snitch. Dixon has been Assulted many times. But the staff Do this on purpose, see # DIXON (Refuse's to lock) go to his cell, staff gets to steal All his property and lock him down. so it's either stay locked down, No shower, No phone, NO property, or continue to play The Game, staff continues to Deny Any Grievance's, Deny's any mail going out, staff gives Dope to people and moves Aryans around Dixon. Every A.B. in P.C. lives in Dixon's Block, what? How can that be protection, Every enemy IS moved next to Dixon. Rememdy the court Needs to step in. we need a protection order.

[Pg 5]

Someone Needs to investigate, Dixon Debriefed and went on record, most staff admit Dixon isn't in a gang and "Stg" set him up.

By policy After (Debrief) inmates get (passive) classification. They left Dixon Disruptive. They have Active real Gang Bangers labeled passive, And Dixon Disruptive. NO violent Ticket, NO History, Nothing to support it. Dixon requested to Debrief to real F.B.I. And law enforcement, But "Stg" tell's the law enforcement I Don't know Nothing not to Bother with seeing me, Then They put on There paper work I'm Disruptive world wide Gangster. (I'm IN Danger) "purposey" They steal property, falsify R.I.B. reports, falsify "Stg" files And pay inmates to Threaten and assault me, Bottom Line, the witnesses who watched the murder said they suffacated the victim, The medical report for Death, says suffacation, - How Did the witnesses say How He Died Before Any medical Exam unless They be True, I Need help. investigation, placed in a real (P.C.) not lock down, not gang yard. } Pg 6

I request to be placed in (protection) from inmates and staff, my name needs changed. Because I got a bounty to kill me from my criminal case, the clerk's published the facts I assisted to (bust) a drug cartel's stash, so now I'm in danger from my case, then staff at O.D.P.C. are out to get me because I gained knowledge of a murder and tried to expose it, everyone says why should I care about the inmate they killed. Well the fact is O.D.P.C. staff and government period is now acting as a gang who can violate our civil rights and no one can get any help... no one listens, no one cares, we got a dead man while a murder walks free under the badge of government. covered up by the state trooper's who investigated and O.D.P.C. staff. Everyone with knowledge of it has been threaten, stolen from, beat, ect. (Help)

Certificate of service

one true copy mailed January 10-18 - By pto-se.

Ref# TOCI0218000029	Housing: B1N0008	Date Created: 02/03/2018
ID#: A529169	Name: DIXON, WILLIAM	
Form: Appeal	Subject: STG	Description: STG
Urgent: No	Time left: n/a	Status: Closed

Original Form

2/3/2018 11:45:01 AM : (a529169) Wrote

first i realize toci probably isnt able to help me i did write a direct and im just coming back to go this way if they say start here. ok first when i got locked up they took alot of legal stuff my mail had alot of letters that was evidence in criminal case. and also had my divorce papers in it and all kinds of stuff the letters was for criminal and civil action to verify stuff i my claims. also my address book had alot f legal addresses and other addresses needed and also my blue folder and letters and my point i need what they took back . now about todd friend i was found guilty of threats for having fbi check hm out , they said how would i feel if staf contacted my people ect on street well todd friend has ,he has harrassed m 85 year old grandma tried to tell her not to help me that i am in a gang and recruiter and was very mean to her. now he also talked to the publisher who was helping me write my book and he pulled up on kandale harrison and shared stg information tried to get him not to contact fbi on my behalf why can he share stg materile with people on the street which it was all fake he made up and manufactured he also pulled up on others and my face book . the man has tried to stop me from getting anyone to listen to me or get the police involved to cover up murder and the false stg they did on me . so since im in violation of policy for threats to contact fbi and that is wrong for me to do that per lt benntett he said the threat is staff beng checked out by people on the street. ok well tyhen he shouldnt be contacting my people and trying to tell them not to help me that im no good and a gang leader all based on information he feed to inmates the ci. they used all wrote me statements saying they was coersed. i still want my lie detector. remedy todd friend should be removed he cant handle stg and if he didnt intentionally set me up and if inmates and lt thomas tricked him to cover up murder after i told him about the murder if he is that nieve he cant do the job. the camras in mci show they met for gang meetings for months before i got there so how did numbers encrease whent hey was there when i got there and also the phone calls of my first days at mci show i was talking about all the royals at mci before i got there under ice its on the phone .

Communications

2/8/2018 3:28:56 PM : (Jason Bennett) Wrote

I talked to R Jones and says nothing of that nature was taking from you.

2/8/2018 7:18:39 PM : (a529169) Wrote

well i know for sure stg took my packet of mail and blue folder which if ryan jones didnt take it then dj norris and mattgillum took it . i have it documented on my paper work that i didnt get it and it was taken in pack up and it was stg who went in my sell so i know for sure all that stuff was taken i had a packet of mail in a plastic bag it was marked on contraband slip and logged ot by stg i made sure all got documented casue i know they would come back saying they didnt get it . so please find my mail most of it was eviedence in my criminal case and it also had my legal mail in the envelopes still divorce papers and all kinds of other legal stuff along with my blue folder which had my legal motion outlines and addresses and my address book . i know they took my address book state wide todd friend and dj norris and matt gillum shook down inmates and stole there address books . i got mail from multiple inmates in the hole sayng they stole there address books also. please give me back my mail and stuff i got papers showing it was taken by stg and i need it for my criminal case. that is the definition of theft and obstruction of justice becasue its really funny i told stg and dj norris and wrote grievences about the letters i had that i made copies of for tood friend and lt thomas . see i told them on grievence that i gave mci documents of threats and stg issues and the stuff about hughes and the documents turned over which authenticated todd friend knowingly tried to kill me. now they come to toci and steal all my mail and now they claim they dont have it , no no no. give back the eviedenve if you claim you dont have it the fact you stole it makes it een more of a conspiracy. to cover up more stuff.

2/22/2018 3:17:55 PM : (Derek Burkhart) Wrote

This office is in receipt of Notification of Grievance Case TOCI 01-18-000264 submitted by Inmate Diehl. In your grievance you state you were on rule 39 sanctions and your electronics were taken. When you came off sanctions, you claim no one could find your TV. *That was for another inmate - my complaint here.* During my investigation, I have reviewed your complaint. I have spoken to Mr. Jones, Mr. Norris, Mr. Gillum and Mr. Friend. I have reviewed policy 61-PRP-01 – Inmate Personal Property, Administrative Rule 5120-9-32 – Inmate property claims, Administrative Rule 5120-9-33 – Packages and property restrictions, and Administrative Rule 5120-9-31 – The inmate grievance procedure.

It is my findings that Mr. Jones, Mr. Norris, Mr. Gillum, and Mr. Friend all personally shook down your cell to look for information related to the investigation they were pursuing. They all indicated that absolutely nothing left that cell with them as they did not find anything of interest or concern. There is no evidence to conclude that the individuals you claim took items did indeed confiscated property from you and not return it.

Your Grievance is denied – insufficient evidence to support claim. This office will take no further action concerning this matter.

This ends Disposition of Grievance TOCI 01-18-000264.

P91

Ref# TOCI0218000029

Housing: B1N0008

Date Created: 02/03/2018

2/23/2018 8:26:38 AM : (a529169) Wrote

well i dont think the inspector read the informal complaint or the notice of grievance. i never mention the t.v not one time. they never even told me they found my t.v. until i came off sanctions so that wasnt even in complaint. the fact is i documented on the property formt aht my mail legal mail and blue folder of affidavits was taken it was logged in that stg had it and i documented i didnt recieve it on the form and also state wide they stole other inmates address books they stole my address book so we are to beleive that the pack up officers lied the paper work lied the 20 other inmates who lost there addresss books in multiple other prisons lied all to make a claim over lost property that isnt worth no money value. really.

look they stole teh evidence that was letters and affidavits about how stg was coersing multiple inmates to lie. i had letters about frost and the simon city royals wanting me dead the same letters i copied for shaw lt thomas and todd friend before tehy purposed sent me to mansfil;ed to get killed now they claim they dont have none of these items yet its on the form as missing and they shook me down they took it. now they didnt . right the value of all they stle is still the same .the fact tehy stole it makes it more of a conspiracy. they took my stuff and i went to sgt to file theft loss report. i have asked 3 times to do theft loss report . still havent done that yet.but i got my copy of reciept they took the stuff contraband .

4/2/2018 2:06:53 PM : (Candace Henry) Wrote

April 2, 2018

Dixon , William - 529169

Dear Mr. Dixon:

Please be advised that additional time will be required before a decision can be made concerning your appeal. This extension is needed by the writer in order to affect a fair and proper resolution.

Sincerely,

Candace Henry

Chief Inspector's Office

4/24/2018 4:45:58 PM : (Kelly Riehle) Wrote

The issue addressed in this appeal has been addressed several times previously and therefore, will not be addressed again in this appeal response.

The decision of the Inspector is AFFIRMED.

K. Riehle

Assistant Chief Inspector

PS2

Contraband Control Slip

18-001

Institution: <u>ToCI</u>		
Inmate: <u>Dixon</u>	#: <u>529169</u>	Lock: <u>BIN21</u> BIN-8
Date: <u>1/3/18</u>	Time: <u>1350</u>	AM / <input checked="" type="radio"/> PM
Confiscated By:		
Contraband Description: <u>possible "STG" material</u>		
Contraband Found (Location): <u>BIN21</u>		
Contraband found in the Possession of: <u>Dixon</u>	Contraband Belongs To: <u>Dixon</u>	
Contraband/Disposition:		

CHAIN OF CUSTODY

From: <u>Kaiser</u>	Received By: <u>TKobon</u>
Date: <u>1/3/18</u>	Time: <u>1730</u> AM / <input checked="" type="radio"/> PM
From: <u>TKobon</u>	Received By: <u>Vault/TKobon</u>
Date: <u>1/3/18</u>	Time: <u>1745</u> AM / <input checked="" type="radio"/> PM
From:	Received By:
Date:	Time: AM / PM
From:	Received By:
Date:	Time: AM / PM
From:	Received By:
Date:	Time: AM / PM

DRC4086 (Rev. 02/04)

DIST: White - Conduct Report Copy; Canary - Evidence Tag Copy; Pink - Inmate's Copy



United States District Court

Northern District of Ohio

Office of the Clerk

(216) 357-7000

Sandy Opacich
Clerk of Court

2-161 Carl B. Stokes United States Court House
801 West Superior Avenue
Cleveland, Ohio 44113-1830

November 20, 2018

William Dixon
A529169
TOCI
P.O. Box 80033
2001 East Central Avenue
Toledo OH 43608

RE: Copy Request - 17cv1476

Greetings:

The total cost for the copies you request is \$75.50. (151 pages at .50 cents per page)

For copies of the available documents listed above, please make check or money order payable to Clerk, US District Court, and include a self addressed stamped envelope and a cover letter with your return address and mail to:

US District Court - ND Ohio
Attention: Records
801 West Superior Avenue - Suite 100
Cleveland, Ohio 44113

Once payment is received and processed, the requested copies and a receipt for same will be provided.

Thank you.

Sandy Opacich, Clerk
by: KC, deputy clerk
Clerk's Office

pg 4

568 John F. Seiberling
Federal Building and U.S. Court House
2 South Main Street
Akron, OH 44308-1876
(330) 252-6000

114 James M. Ashley & Thomas W. L. Ashley
U.S. Court House
1716 Spielbusch Avenue
Toledo, OH 43604-5385
(419) 213-5500

337 Thomas D. Lambros
Federal Building and U.S. Court House
125 Market Street
Youngstown, OH 44503-1787
(330) 884-7400

pg 4

Ref# TOCI111800082	Housing: B1N0008	Date Created: 11/06/2018
ID#: A529169	Name: DIXON, WILLIAM	
Form: Appeal	Subject: Mail	Description: Mail
Urgent: No	Time left: 25 Day(s)	Status: Pending

Original Form

11/6/2018 9:16:43 AM : (a529169) wrote

i recieved mail cesour for ed mcdowell , it dont say why or when the mail was sent. ect. i should be told why the mail was cencoured.

Communications / Case Actions

11/6/2018 9:16:43 AM : (a529169) wrote

Form has been submitted

11/6/2018 9:55:18 AM : (Scott Matthias) wrote

I find nothing on JPAY for a Ed McDowell. Was this from JPAY or from the mailroom?

11/6/2018 2:35:25 PM : (a529169) wrote

Submitted a reply.

11/6/2018 2:35:25 PM : (a529169) wrote

correction on name ed mcConnell
nov 6 2018

i spoke to him today he said it was mail i sent him , but there was no reason to block my mail.

11/13/2018 9:44:33 AM : (Scott Matthias) wrote

I found nothing being held for you from an Ed McConnell.

11/13/2018 9:44:38 AM : (Scott Matthias) wrote

Closed inmate form

11/13/2018 7:25:19 PM : (a529169) wrote

Escalated to Grievance

11/13/2018 7:25:19 PM : (a529169) wrote

i recieved a notice they was holding an email to ed mconnell

i spoke to mr. mconnell and he never recieved the jay pay so who blocked it if you have no record of blocking it.

11/27/2018 1:28:37 PM : (Derek Burkhart) wrote

This office is in receipt of Notification of Grievance Case TOCI 11-18-000082 submitted by Inmate Dixon A-529169. In your grievance, you state you sent a JPay to Ed McDowell that was censored. You do not believe there was any reason to block you mail.

During my investigation, I have reviewed your complaint. I reviewed policy 75-MAL-01 – Inmate Mail, 75-MAL-02 – printed material, AR 5120-9-17 – Incoming Mail, and AR 5120-9-31-Inmate Grievance Procedure.

I have found that upon review of the JPay message, this was flagged for the use of the word gang and stg. You discuss matters in the message regarding this person adding other inmates and talking to them on your behalf. Upon speaking with STG Bennett, he determined this email should not be released to you and that he would be speaking with you. Your Grievance is denied – no violation of rule, policy, or law. This office will take no further action concerning this matter.

This ends Disposition of Grievance TOCI 11-18-000082

11/27/2018 1:28:41 PM : (Derek Burkhart) wrote

Closed inmate form - Disposition: Denied

12/6/2018 8:48:19 AM : (a529169) wrote

Escalated to Appeal

12/6/2018 8:48:19 AM : (a529169) wrote

well this is violation of due process, i am collecting wittnesses for my active civil suite and my only option as pro se is to have people contact the inmates that stg have falsified there reports on so i may call them as wittnesses. this is a direct violation of the law .

i have no gang talk and no illegal activity. in fact it was me asking someone to get locations on people for addresses so i can ask the court to sepnna them as wittnesses and send there information to the court.

P95

Ref# TOC1118000082

Housing:B1N0008

Date Created:11/06/2018

Page: 2

it was dj norris gillum and todd friend who claimed these men are gang members and claim they have eviedence they are in a gang with me.

i have asked ed mcdowell and others to take lie detectors and be witnesses to these false accounts. that is what the jay pay was about so the fact these people want to stop me from finding wittnesses for the court and exposing the corruption in stg.

see stg has a one sided investigation they will make up false confadential informates and claim someone says this , then they will use that information to claim someone is in a gang or did illegal activity.

so soon as someone gets close and starts to track down these people and ask to take them to court or get lie detectors the stg get nurvis they cant have there corrupt organization exposed.

stg is an all white nazi gang , they have no people of color black latin or jewish in there rank its the good ole white boys who falsify there reports and come in to do illegal stuff,

when odrc has to cover up murder or any other thing, if odrc has to sell tobaco or drugs set up people , reach a mark on the odrc agenda they send in stg to falsify and set up, they are criminals and now that i am close they are debnying my rights to mail and trying to collect my wittnesses the courts are gona have to here this case and the public will see you for what you are.

because i said the word gang or or stg isnt a reason to stop a letter in the mail room , because the contex of the letter was they are saying im in a gang and stg claims that you are and i want you to be a witness. lie detector.

see i located all the people who have wrote statemnts and now they are doing what they do, they have threaten ed mcconell they have started threatening people who are helping me expose this. this will be in court soon.

pg 6

Ref# TOCI1218000221	Housing: B1N0008	Date Created: 12/14/2018
ID#: A529169	Name: DIXON, WILLIAM	
Form: Appeal	Subject: Chaplains Office	Description: Chaplains Office
Urgent: No	Time left: n/a	Status: Closed

Original Form

12/14/2018 8:45:24 AM : (a529169) wrote

greetings well you are wrong again, you claim you checked your records about my request found none. see thats why i call it anti semtic behaviour because i have filed got stuff from my church and the chaplain spoke to people and he also filed for it twice, i have proir grievances , why not check them out, yes do the work look at the past grievances when i complained about this this year.
toci 0518000215.

Communications / Case Actions

12/14/2018 8:45:24 AM : (a529169) wrote

Form has been submitted

12/14/2018 8:58:03 AM : (Derek Burkhart) wrote

Your concern must be addressed as kite per DRC 50-PAM-02. Please be advised that your improper use of the grievance procedure may result in restricted access in accordance with AR 5120-9-31(E).

12/14/2018 8:58:05 AM : (Derek Burkhart) wrote

Closed inmate form

12/15/2018 7:17:58 PM : (a529169) wrote

Escalated to Grievance

12/15/2018 7:17:58 PM : (a529169) wrote

this is violation of policy, the inspector is to respond to the second level not the first, also kites and accomadation forms was done twice, i still got copies of what my church sent in to attach at the chaplains request.
the inspector did here what he always does a fast spin move, he tried to use a policy that dont apply to avoid the issue. any half truth is a whole lie and any spin move is a lie, and no matter who you lie to your a liar,
bottum line, i have a good faith complaint, i filed for my kosher meals with the chaplian and he failed to do it, in may i filed a grievance we did it all again, so why is it every jewish christain under the messianic belief is denied to get his meals in the chow hall, the other guy had to go on strike and deny to eat,
so the only jew in here who gets his meal had to almost kill himself to get it and it caused outside attention,

12/17/2018 10:04:45 AM : (Derek Burkhart) wrote

Your concern must be addressed as kite per DRC 50-PAM-02. Please be advised that your improper use of the grievance procedure may result in restricted access in accordance with AR 5120-9-31(E).

12/17/2018 10:04:49 AM : (Derek Burkhart) wrote

Closed inmate form - Disposition: Denied

12/17/2018 1:01:28 PM : (a529169) wrote

Escalated to Appeal

12/17/2018 1:01:28 PM : (a529169) wrote

i beliee i started with the kite system in january 2018 on this issue, so he inspector is trying to avoid the issue, i did kites 3 times and 2 accomadation forms with contat to people on the street and had a sermon mailed in on my beliefs, which i still ahve copies of so i did the kite system and it didnt work. maybe the inspector needs to go to school to learn how to tell the truth and not manipulate and do the job by integrity and policy. of course he is probably anti semtic thats why he ignorres me.

12/24/2018 9:45:04 AM : (Kelly Riehle) wrote

The Office of the Chief Inspector is in receipt of your Appeal; a thorough review of your appeal has been completed that included the application of the following factors:

- Procedural requirements
- Proper investigation of your grievance
- Applicable policies, procedures, administrative rules, directives and ODRC operating manuals
- Documentation and related evidence
- Information presented in your appeal

Pg 7

Ref# TOCI1218000221

Housing: B1N0008

Date Created: 12/14/2018

Page: 2

Based on the aforementioned review, this office AFFIRMS the decision rendered by the Inspector.
Comments: This office is not sure what this complaint is referring to. It appears to be about denial of kosher meals but I'm not absolutely positive about that. Please do not write icrs, grievances or appeals as if you are texting back and forth but write them out properly to included all details of your specific complaint. As this appeal stands, if it is regarding kosher meal accommodation you have used the grievance system improperly. There is an appeal mechanism in place for religious accommodations. You must file an accommodation for kosher meal and if it is denied you may appeal it through the religious accommodation system, not the inmate grievance system.

K. Riehle

Assistant Chief Inspector

12/24/2018 9:45:13 AM : (Kelly Riehle) wrote

Closed inmate form - Disposition: Affirmed

PS 8

Ref# TOCI1218000155	Housing:B1N0008	Date Created:12/10/2018
ID#: A529169	Name:DIXON,WILLIAM	
Form:Appeal	Subject:Chaplains Office	Description:Chaplains Office
Urgent:No	Time left:n/a	Status:Closed

Original Form

12/10/2018 9:14:36 AM : (a529169) wrote

greetings over 6 months ago i filed a grievance, the chaplain said he would take care of my issue.

9 months ago is what the grievance was over.

i filed for my kosher meals and to get my jewish holiday meals.

i explained i am jewish and i am very active.

my beliefs recognize christ yet as a blood line jewish man.

ashkanzi jew we are bound by the law to up hold the law to gain our covent with the heaven father.

gentiles came in under the christ faith. which by christ we are all one. yet by the law those of jewish blood can only

recieve certain contracts with god. by up holding the law. im saved by christ and grace but im blessed by the law.

i had my church send in paper work and i gave a copy to the chaplain.

i spoke to the chaplian.

i was told by novemeber i would get my kosher meals and be on the list.

its now december.

i think this entire place has an issue with jewish people because every corner i turn i recieve lies and spin moves and a jewish man gets no help.

the other jewish man in my block had to do a hunger strike to get the kosher meal why do us jews have to go to great links for our beliefs when everyone else is given there stuff.

im in contact with the discovering jewish jesus group they sent me the case law on why jews get there meals in jail. and

im willing to take it to the next level, really 6 months after 3 months is way to long please get my kosher meals and my other holiday meals. thank you.

Communications / Case Actions

12/10/2018 9:14:36 AM : (a529169) wrote

Form has been submitted

12/12/2018 7:59:39 PM : (Kenneth Rupert) wrote

According our records you have not made a Request for a Religious Accommodation, there is no accommodation request on file requesting accommodations for a Kosher meal for a Jewish Holiday for the calendar year of 2018. On May 22, 2018, a Change of Religion affiliation was approved to Jewish Messianic. However, a change of religion affiliation does not grant you Kosher meal accommodations. Dietary accommodation request must be made by filling out a Request for Religious Accommodation form (DRC 4326)

12/13/2018 10:21:03 AM : (Derek Burkhart) wrote

Closed inmate form

12/14/2018 8:50:34 AM : (a529169) wrote

Escalated to Grievance

12/14/2018 8:50:34 AM : (a529169) wrote

well they are clearly wrong i have had my church send in suff , my people spoke to the chaplian and we refiled twice, i had to file grievances, this is clear anti semtic behavior, why does a jewish man have to file grievances and repeatedly file and still they claim to have no record of it, luckily i got the grievance to authenticate this.

if i didnt have the grievance the inspector would play his game and just say our investivation show no evidence, as always staff will be right, no matter who inspector talks to or what documents i got or evidence i got , they will spin it and manipulate it. lets see if we can spin out this one.

grievance number toci 0518000215

it was a conversation between me and the chaplin and an original grievance documented . the entire process was documneted in the grievance on file so the chaplians office is wrong on all levels. every report they made on the grievance is wrong i still have a copy of the paper my church sent in.

PS9

Ref# TOCI1218000155

Housing: B1N0008

Date Created: 12/10/2018

Page: 2

12/27/2018 12:53:53 PM : (Derek Burkhart) wrote

This office is in receipt of Notification of Grievance Case TOCI 12-18-000155 submitted by Inmate Dixon A-529169. In your grievance, you state that you have filed for kosher meals and told you would be on the list. You state this has taken too long and would like your kosher and holiday meal.

During my investigation, I have reviewed your complaint. I have reviewed your grievance history, OnBase, and the response from Chaplain Rupert. I have reviewed policy 72-REG-01 – Institutional Religious Services, 72-REG-02 – Religious Accommodations, policy 72-REG-07 – Jewish Religious Services, and Administrative Rule 5120-9-31 – The Inmate Grievance Procedure.

It is my findings that as the Chaplain stated, no accommodation request could be located. I could not find the request, approval, or denial in OnBase either. A review of grievance TOCI0518000215 has Chaplain McCullum claiming he submitted your request. Chaplain McCullum no longer works here and is unable to be contacted. It is unclear as to whether or not this request was submitted properly by you and the former Chaplain. There is an appeal mechanism in place for kosher meals and it is suggested the you get with one of the current Chaplains and properly fill out the DRC4326 – Request for Religious Service Accommodation. I have no evidence to support that TOCI is at fault for your kosher meals not being approved in a timely manner.

Your Grievance is denied – insufficient evidence to support claim. This office will take no further action concerning this matter.

This ends Disposition of Grievance TOCI 12-18-000155

12/27/2018 12:53:57 PM : (Derek Burkhart) wrote

Closed inmate form - Disposition: Denied

12/27/2018 1:14:45 PM : (a529169) wrote

Escalated to Appeal

12/27/2018 1:14:45 PM : (a529169) wrote

well if the grievance response from January and April 2018 shows that I was filing accommodations and grievances and was told it was done in April or May 2018 its now going to be 2019 that shows I filed 2 times and the chaplains office must of destroyed my accommodations because I documented it and grieved it. so that means its time to file another grievance this was dealt with by Rieckle and grievance. and if Rieckle responds to this its a conflict of interest, I have an active law suite on Rieckle for negligence so its conflict for that one to respond.

12/27/2018 3:39:19 PM : (Kelly Riehle) wrote

The Office of the Chief Inspector is in receipt of your Appeal; a thorough review of your appeal has been completed that included the application of the following factors:

- Procedural requirements
- Proper investigation of your grievance
- Applicable policies, procedures, administrative rules, directives and ODRC operating manuals
- Documentation and related evidence
- Information presented in your appeal

Based on the aforementioned review, this office MODIFIES the decision rendered by the Inspector.

Comments: This office has checked with the Religious Services Administrator for ODRC. There is no record of a kosher meal accommodation request on file for you. This office realizes that you have an Informal Complaint response from a former employee advising you that an accommodation had been submitted however, this appears to be a mistake. Religious accommodations cannot be reviewed without the proper documentation being submitted. You are encouraged to see Chaplain Rupert to have a Religious Accommodation request for kosher meals submitted. This office has talked with the RSA for ODRC and he has advised that he will be on the lookout for your accommodation request so you should talk with Chaplain Rupert sooner rather than later.

K. Riehle

Assistant Chief Inspector

12/27/2018 3:39:25 PM : (Kelly Riehle) wrote

Closed inmate form - Disposition: Affirmed

10/10

Ref# TOCI118000298	Housing: B1N0008	Date Created: 11/18/2018
ID#: A529169	Name: DIXON, WILLIAM	
Form: Appeal	Subject: STG	Description: STG
Urgent: No	Time left: n/a	Status: Closed

Original Form

11/18/2018 8:55:25 AM : (a529169) wrote

this has an email jay pay sent to stg , statement of facts , which gives greater details to the complaint. this complaint is based on inapropriate supervision under racial bias, anti semtic behavior. stg has no people of color or jewish people ont he stg board, all are aryan white staff that are bias and every investigation done is done by the same anti semtic people. they need to balance out the stg structure they need to stop letting dj norris complete his team of anti semtic people to cover up facts and falsify records, the reason they have no one in ranks of color is because its easier for the racial bias to cover up ther secrects with out any one out side there ranks involved, todd friend never even an stg officer came in from the street to the highest level job in stg why he is a fixer aryan anti semtic liar sent to fix the files for the stg cover ups , bennette here at toci is smarter and more professional than any one in the central office gillum norris or friend, the only reason why bennette never exposed the corrupton on my case is because im jewish he knows what they said and did was all false he knows im not from chicago or the leader or was on banging in little rock he knows that yet he wont go against the white power because he knows that the agenda
bottum line its not raicially balanced at the stg office and the bias toward me and others is true. im in pc , im jewish , i debriefed and was willing to debreif more , they still left me disruptive and active even though my file shows my tattoo was gone in 2015 and nothing supported any gang ties , why anti semtic behavior every aryan brother has there file lowered soon as they get here , passive soon as any aryan debrioefed accross the state passive. they used the aryan for years hits , snitching. every one knows stg used the aryan anti semitic inmates , they give them favor and help the white boys who are raciest any white who rides black or isnt raciest gets the crap deals
jewish men are the lowest, no one stands for us.

Communications / Case Actions

11/18/2018 8:55:25 AM : (a529169) wrote

Form has been submitted

11/21/2018 11:03:51 AM : (Jason Bennett) wrote

This appears to be an opinion and you have no evidence to support these claims.

11/21/2018 11:04:09 AM : (Jason Bennett) wrote

Closed inmate form

11/21/2018 12:44:19 PM : (a529169) wrote

Escalated to Grievance

11/21/2018 12:44:19 PM : (a529169) wrote

this is not an opinion, its a fact that every other inmate who went through the same processs as me was treated different with debriefing,
also its a fact that atleast 3 of the 4 things stg used against me in rib was false and can be proved by there own files and paper work.
also im the only one they have ever done like they ahve done me with the file of leadership after an fbi invest they had odrc staff initiated.

11/21/2018 12:44:20 PM : (a529169) wrote

Escalated to Grievance

11/21/2018 12:44:20 PM : (a529169) wrote

this is not an opinion, its a fact that every other inmate who went through the same processs as me was treated different with debriefing,
also its a fact that atleast 3 of the 4 things stg used against me in rib was false and can be proved by there own files and paper work.
also im the only one they have ever done like they ahve done me with the file of leadership after an fbi invest they had odrc staff initiated.

12/4/2018 11:06:24 AM : (Derek Burkhart) wrote

This office is in receipt of Notification of Grievance Case TOCI 11-18-000298 submitted by Inmate Dixon A-529169. In your grievance, you appear to make opinions regarding STG Coordinators DJ Norris and Todd Friend.

9/11

Ref# TOCI118000298	Housing: B1N0008	Date Created: 11/18/2018	Page: 2
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During my investigation I have reviewed your complaint. I have spoken to Lt. Bennett. I have reviewed your RIB history, DRC Security Policy, Administrative Rule 5120-9-37 – Inmate Group Activities, and Administrative Rule 5120-9-31 – The Inmate Grievance Procedure.

It is my findings that you were charged with a Rule 17 violation (Engaging in unauthorized group activities as set forth in paragraph (B) of rule 5120-9-37 of the Administrative Code) at Marion Correctional Institution on March 21, 2017 and subsequently found guilty. You have appealed your conviction which was denied. STG Bennett has spoken to you on many occasions and any matters related to STG will be handled according to policy.

Your Grievance is denied – no violation of rule, policy, or law. This office will take no further action concerning this matter.

This ends Disposition of Grievance TOCI 11-18-000298.

12/4/2018 11:06:28 AM : (Derek Burkhart) wrote
Closed inmate form - Disposition: Denied

12/5/2018 7:08:12 PM : (a529169) wrote
Escalated to Appeal

12/5/2018 7:08:12 PM : (a529169) wrote

well first asst chief inspec. rieckle has no business on my grievance process , i have an active law suite and its conflict of interest and its clear retaliation for rieckle to ignore my due process .
so i need a review by some one else.

now this complaint has to do with norris friend and gillum and the rest of the stg staff being aryan anti semitic people. and no people of color have any rank in the stg program.

which leaves room for false reports and bias.

when people are one color and racist against jews it can be clear conflict of interest.

then burkhart the inspector here at toci is with the same program of anti semitic behavior. the staff have a secret group that falsify the record and lie.

on this grievance burkhart raised my rib history.

i have one rib rule 17 in 13 years and if anyone did an invest that was of color and not racist they would not say it has any merit.

thomas is anti semitic and he worked with friend to set me up , they used it to cover up murder at mci.

now the issue has nothing to do with the past we are talking about the present. they lied and failed to uphold fair and balanced program with me. every white aryan inmate who debriefed and came to pc got his jacket changed soon as they debriefed, they went to passive then went to non member after a few years. they are not giving me the same treatment. they are bias and the fact they have no rank in stg with jewish or black decent is conflict. they need some color in central office to be over sight for these racist white boys. they are favorable state wide to aryan they are on the side of stg and treated different that is because they all have the same values.

also the news and special reporting has uncovered toledo is the base for the nazi movement and down south is kkk so they have the 12 monkeys who investigated and the public knows now about this issue in odrc.

12/27/2018 2:53:47 PM : (Kelly Riehle) wrote

The Office of the Chief Inspector is in receipt of your Appeal; a thorough review of your appeal has been completed that included the application of the following factors:

- Procedural requirements
- Proper investigation of your grievance
- Applicable policies, procedures, administrative rules, directives and ODRC operating manuals
- Documentation and related evidence
- Information presented in your appeal

Based on the aforementioned review, this office AFFIRMS the decision rendered by the Inspector.

pg 12

Ref# TOC1118000298	Housing: B1N0008	Date Created: 11/18/2018	Page: 3
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Comments:
K. Riehle
Assistant Chief Inspector

12/27/2018 2:53:55 PM : (Kelly Riehle) wrote
Closed inmate form - Disposition: Affirmed

Pg 13

Ohio Supreme Court

19-0070

William Dixon - Movant
- vs -

(Affidavit of Indigency - Notarized -)

~~William Dixon~~
Clerk of Courts **FILED**
JAN 18 2019
CLERK OF COURT
SUPREME COURT OF OHIO

Motion to Ask to move
without payment, Based on
Indigent status.

Sandy Opacich - respondent -
Clerk of Courts case # 17-cv-1476

William Dixon #529-169
TO C I PO BOX 80033
Toledo, Ohio, 43608
- movant -

U.S. D. C. Northern District of Ohio
office of The clerk
801 W. Superior Ave.
Cleveland, Ohio, 44113-1830

I William Dixon swear All is true, I have no money
I have NO way to pay Court Cost, I AM only receiving
80% of All state pay. 20% Goes to the court, I
only Get 18⁰⁰ total a month, 16⁰⁰ After 20% -

I Did receive \$495⁰⁰ (From small claims) one
Time for lost property. which IS now All Gone,
The 495⁰⁰ was to Buy All living Items, clothes
medicine, ect. which IS Gone, Beyond That
Money Dixon has No houses, NO car's, NO
way to pay Any Court Filing Fee's.

(Notary Page 2)

William Dixon pro-se
William Dixon pro-se

RECEIVED
JAN 18 2019
CLERK OF COURT

pg 1 of 2

*Ohio Supreme Court Affidavit
For Request of Indigency*

Ohio Department of Rehabilitation and Correction

CASHIER'S OFFICE
TOLEDO CORRECTIONAL

SECTION I - To be completed by cashier prior to this form being presented to the inmate for completion of SECTION II - Affidavit of Indigency.

2018 NOV -01 12:55

I, C. Ray, cashier at the Toledo Correctional certify that the following is a true and accurate reflection of the status of the account maintained at this institution for the benefit of:

Inmate Name: <u>W. DIXON</u>	Inmate Number: <u>A529-169</u>
------------------------------	--------------------------------

Account Balance as of <u>12/10/18</u> :	\$ <u>46.92</u>
Total state pay credited for the preceding six months;	\$ <u>108.00</u>
Average monthly state pay for the preceding six months;	\$ <u>18.00</u>
Total funds received from all sources, excluding state pay, for the preceding six months;	\$ <u>568.03</u>

Signature of Cashier: <u>C. Ray FA TOC1</u>	Date: <u>12/10/18</u>
---	-----------------------

AFFIDAVIT OF INDIGENCY

SECTION II - To be completed by inmate after cashier's statement is completed.

I, William Dixon, being first duly sworn, says that he/she does not have sufficient funds to pay the filing fee and other costs of prosecuting this complaint against the State of Ohio, Department of Rehabilitation and Correction, in the Court of Claims of Ohio and submits the cashier's statement (Section I) in support of said allegation of indigency.

I hereby represent that the Information set forth in the cashier's statement concerning my financial condition is true and complete to the best of my knowledge and belief.

Inmate Name: <u>[Signature]</u>	Inmate Number: <u>529-169</u>
---------------------------------	-------------------------------

Sworn to and subscribed to me in my presence this 21 day of December, 20 18.



PATRICIA R. CEGLIO
NOTARY PUBLIC - OHIO
MY COMMISSION EXPIRES 08-10-2021

Notary Public: <u>Patricia R. Ceglie</u>
--

*Pg 2 of 2 certificate of service
mailed to clerk - Jan 10 18 - [Signature]*

The Supreme Court of Ohio

FILED

JAN 18 2019

**CLERK OF COURT
SUPREME COURT OF OHIO**

To wit: January 18, 2019

Case No. 2019-0070

SUMMONS

The following has been named as respondent in the enclosed action:

Clerk Sandy Opacich
U.S.D.C. Clerk
801 W. Superior Ave
Cleveland, OH 44113-1830

You are hereby notified that a complaint for a writ of mandamus has been filed against you in the SUPREME COURT OF OHIO, 65 South Front Street, Columbus, Ohio 43215-3431, by William Dixon 529-169, TOCI, P.O. Box 80033, 2001 E. Central Ave., Toledo, OH 43608.

Furthermore, you are hereby served with a copy of the complaint (enclosed) and are required to file an answer to the complaint or a motion to dismiss on or before the 21st day after service of this summons. See S.Ct.Prac.R. 12.04.

If you fail to respond timely to the complaint, this action will proceed before the Court.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the seal of the Supreme Court, this January 18, 2019.

SANDRA H. GRSKO CLERK

Justin Luckels DEPUTY

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JAN 2 2019
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Clerk Sandy Opacich

Sent to: U.S.D.C. Clerk
801 W. Superior Ave
Cleveland, OH 44113-1830

Reference Information
SCOCLERK/jls
2019-0070

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		B. Received by (Printed Name)	C. Date of Delivery 6/24/19
1. Article Addressed to: Clerk Sandy Opacich U.S.D.C. Clerk 801 W. Superior Ave Cleveland, OH 44113-1830		D. Is delivery address different from item 1? If YES, enter delivery address below: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
		3. Service Type: <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery	
2. Certified Mail (Form 3800) Article Number 9414 7266 9904 2101 6274 64		Reference Information 2019-0070 SCOCLERK/jls	
PS Form 3811, Facsimile, July 2015		Domestic Return Receipt	

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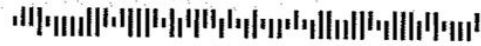
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SUPREME COURT OF OHIO
CLERKS OFFICE 8TH FLR
65 SOUTH FRONT STREET
COLUMBUS OH 43215-3431

FILED

JAN 28 2019

CLERK OF COURT
SUPREME COURT OF OHIO

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
William Dixon
(b) County of Residence of First Listed Plaintiff
(c) Attorneys (Firm Name, Address, and Telephone Number)
Pro Se

DEFENDANTS
Clerk Sandy Opacich, U.S.D.C. Clerk
County of Residence of First Listed Defendant
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question
4 Diversity

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)
1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. 1442
Brief description of cause:
This case is being removed from the Ohio Supreme Court

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE DOCKET NUMBER

DATE 02/06/2019 SIGNATURE OF ATTORNEY OF RECORD s/Leah M. Wolfe

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

Parties Not Served	Parties Dismissed	Answers Filed
<i>I.E. Defendant John Doe</i>	<i>I.E. Defendant John Doe</i>	<i>I.E. Defendant John Doe</i>

Party and Type	Attorney(s)
<i>I.E. Plaintiff John Doe</i> William Dixon Sandy Opacich	<i>I.E. Attorney(s) Name</i> <i>Firm</i> <i>Address</i> <i>City, State, Zip</i> <i>Telephone and Fax Number</i> <i>Supreme Court Number</i> Pro Se 529-169 P.O. Box 80033 2001 E Central Avenue Toledo, OH 43608 Leah M. Wolfe (0093299) Assistant United States Attorney 303 Marconi Blvd., Suite 200 Columbus, OH 43215 Phone: (614) 469-5715 Fax: (614) 469-2200

USE A SEPARATE SHEET OF PAPER IF NECESSARY