



FILED

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

2022 NOV 17 P 3:48

CLERK OF COURTS
CUYAHOGA COUNTY

CATHERINE M STARK ET AL

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CASE NO.: CV 22 969917

)

Plaintiff,

)

JUDGE: BRENDAN J SHEEHAN

)

v.

)

)

WILLIAM EASTON HORNER ET AL

)

DEFENDANT'S ANSWER TO

)

COMPLAINT

Defendant,

)

Now comes Defendant, William Horner, by pro se representation and provides the following answer to Plaintiff's complaint.

Plaintiff's complaint can be broken down into three salient points. First, that Defendant's website www.Rights4Fathers.com and its associated digital and print media constitute defamation upon Plaintiff's character and that the sites should be brought down. Second, that Defendant's cases brought before the Cuyahoga County court system are vexatious litigation and should be purged from the docket with Defendant's ability to bring new litigation quashed. Finally, that Plaintiff has suffered substantial monetary harm from Defendant's actions and that Defendant should pay \$25,000 in damages to Plaintiff for reputation loss suffered.

To these three points, Defendant makes the following answer. First, defamation is defined by bearing false witness. True witness is not defamation your Honor it is news. News is protected under the First Amendment to the United States Constitution, and this Court has no authority to take down the site. Furthermore, Defendant's MinuteMan cybersecurity credentials prevent the silencing of the

message. So regardless of what this Court thinks its authority to take down the site is, the Court simply does not possess the technical capability to remove the writing. Period. All Stop. End of Line.

Second, vexatious litigation is defined as legal proceedings started with malice and without good case. Defendant was hauled out of his attorney's office by SWAT officers, without a warrant, and incarcerated in a mental institution for five days on a bogus probate warrant the Court has since expunged so that the case never existed. The appeals court threw out Defendant's argument because they claim transcripts were not delivered from the trial court while the trial court's own docket documents delivery of the transcripts. Finally, Judges in this courthouse have dismissed arguments for "failure to prosecute" while holding court in the dark without even notifying Defendant of the proceedings so that he could attend and prosecute his case. At the same time, this same Court is using the illegal incarceration that "never existed" and perjurious drug charges which are not being prosecuted and for which Defendant is being denied an attorney to allow Plaintiff to claim Defendant is unfit to have any access to his children for 818+ days.

The idea Defendant is "without good case" is simply hilarious given the circumstances and any attempt by the Court to silence the truth through labeling Defendant a vexatious litigant will only add fuel to the fire that the Cuyahoga County Court system is actively working to cover up their involvement in this conspiracy of lies. Defendant's websites are already receiving foot traffic in the thousands of visitors. How many more does Your Honor think will flock to the site once his name is attached to the website as the Judge who attempted and failed to silence a citizen's voice exposing a corrupt courthouse.

Finally, regarding the \$25,000 Defendant simply does not have it. Further Defendant works as a server in a cash economy to specifically prevent the ability of this Court to garnish his wages or in any way forcibly extract the funds. Defendant's substantial digital skill enables earning power into the high

six figures as a data scientist, and Defendant has turned down higher paying data science jobs to remain in a cash economy which can't be raided by this Court. Simply put, your Honor can't extract blood from a rock and Defendant has carved that rock in specific peaceful protest to prevent the blood's extraction.

Now that the Plaintiff's complaints have been addressed, Defendant is going to address the rock he has constructed which the Court is smashing itself against.

Your Honor, being a learned Man and Judge, is no doubt familiar with the story of Moses from Exodus. Moses' demand to Ramseys was simple, "Let my people go." Moses didn't demand the grain from Pharaoh's fields, he didn't demand back payment for the 400 years his people spent in slave bondage building the pyramids, he didn't demand restitution for the murders. He simply demanded Ramseys let his people go. Just like Moses, Defendant's demand to Plaintiff is simple. "Let my children go."

Your Honor, being a learned Man and Judge, is no doubt familiar with what happened next. Pharaoh did not let Moses' people go, and in consequence to his arrogance God sent the plagues to lay waste to his empire bringing Pharaoh to heel. The worst of course being Passover where the Almighty extinguished the life of the first born of Egypt.

Can Your Honor imagine the exchange between Ramseys and Moses the next morning? Pharaoh holding his dead son in his arms appearing before Moses' crying, "Look at what your God has done. How can anyone worship such a God?" Then the response from Moses, "Pharaoh...no Hebrew child died last night."

How does Your Honor think Moses felt at that moment? Was it a feeling of righteousness at being proven right? Was it a "ha-ha I told you so" feeling? Was it you got what you deserved? No, your Honor...it was a feeling of pity. Pity for Pharaoh at the costs his own arrogance wrought upon him. The

death of his beloved Son. What can one say at such a moment other than, "Pharaoh, go bury Egypt's children."

Just like He did upon Pharaoh, the Almighty has visited plagues upon Plaintiff and for the same reason, her failure to let my children go. He has ransacked her career, denied her promotion, and put her on a leave of absence from work. He has alienated her from her neighbors whom she's shared relationships with for three decades. He is preventing her from finding a new partner in love, forces her to live in constant terror seeing shadows of violence everywhere she goes despite there being none, and has bankrupted her financially through constant legal fees. At this moment, Defendant is engaged with no less than seven different attorneys, all of which are being paid for out of Plaintiff's pocket either directly through fees or indirectly through career stagnation. The expenses upon Plaintiff must be tremendous.

By comparison, Defendant's cup runs over. He advances at work with a management team amazed at his dedication and encouraging of his fight against this injustice. He was blessed to teach 63 highschoolers, and to this day enjoys seeing their smiling faces and hearing how their college studies are progressing. His class clown whom no-one except Defendant believed would amount to anything has even begun pursuing a bachelor's in marine biology directly inspired by Defendant's teachings. Defendant has been blessed with new love for a new amazing woman in awe at a father who is still fighting for his children 818 days later. Of the thousands of views of his content, Defendant has received more than one solicitation from single mothers who would give anything to have their baby daddies show one hundredth of the dedication and fight to see their children that Defendant has shown to see his. 818 days fighting and still counting Your Honor...yet Plaintiff and this Court still attempt to label Defendant a deadbeat dad.

After his people were safe on the other side of the Red Sea, Moses went up into the mountains to converse with God and bring his people Law. Can you imagine the scene your Honor? Conversing with a burning bush, Moses carving the new Laws into rock. This is probably Defendant's favorite part of the story. Why carve the Law into rock?

Because God had tried everything else Your Honor. He tried writing it in blood. He tried writing it on papyrus. He tried passing the stories down through oral tradition. None of these worked. Carving the Law into rock was the only way the lesson stuck.

The ninth of these Laws is written, "Thou shalt not bear false witness against thy neighbour." (Ex. 20:16) Plaintiff has broken this commandment and is now suffering the consequences. She bore false witness against her husband to have him wrongfully incarcerated in a mental institution and fabricate drug charges to take his children from him. Plaintiff is now paying her penance, and if she does not let the children go Defendant will haul her up onto the rock upon which the Law is written and find justice.

It brings Defendant no pleasure in doing this. In most of his prayers, Defendant asks God to spare him from this burden and prays for Plaintiff to stop her own destruction through a change of heart.

Defendant does not want to drag Plaintiff onto the rock and expose the medical records filed [REDACTED] which demonstrate the Defendant's mental illness was "in remission" at the time she filed her [REDACTED] probate warrant claiming he was a danger to himself and others. But he will if she does not let the children go.

Defendant does not want to drag Lorraine [REDACTED] of the Cleveland Clinic onto the rock and expose how she changed Defendant's medication against his will telling him if he did not take it he would never see his kids again, for a diagnosis unsupported by medical facts, for a disease which she

herself claimed was "in remission." This medical malpractice was done specifically to trump up mental health concerns [REDACTED] and almost led to Defendant's death. Defendant does not want to do this, but he will if Plaintiff does not let the children go.

Defendant does not want to drag Patrolman [REDACTED] and Law Director Michael [REDACTED] onto the rock and expose the [REDACTED] drug charges on behalf of the Plaintiff for substances allegedly found in Plaintiff's home because Plaintiff wrote an email to Law Director O'Shea [REDACTED] that Defendant is a menace to society. But Defendant will if she does not let the children go.

Defendant does not want to drag Brandon [REDACTED], a former friend and college of Defendant's, onto the rock and expose how he ran an illegal rouge surveillance operation against Defendant for months to both terrorize him and steal his private intellectual property for use in fighting cybercrime. But Defendant will, if she does not let the children go.

Defendant does not want to drag Pamela [REDACTED] (aka Melissa) and John, Brandon [REDACTED] direct subordinates, who were assisting with his rouge operation, up onto the rock and expose the details of how Brandon was terrorizing Defendant. But Defendant will, if she does not let the children go.

Defendant does not want to drag Director of the FBI, Christopher Wray, onto the rock and expose how he is actively working to cover up his team's involvement in terrorizing a United States Citizen in violation of every law and liberty we hold dear in this Nation. But he will if she does not let the children go.

Defendant does not want to drag Judge Tonya R. Jones up onto the rock and expose how she worked to cover up [REDACTED] Defendant's cell phone in direct violation of her mutual protection orders. But he will if she does not let the children go.

Defendant doesn't want to do anything of these things. But the law of the Almighty demands it. A mother bore false witness against a father and took his children from him. By the Law written on the rock itself, and in the name of the Almighty Father, Defendant will now hold her to account.

History is filled with stories about how, "Hell hath no fury like a woman scorned." Judge Solomon himself was charged with dividing a baby in half between two women so deep was the scorn between them.

Does Your Honor know why there are no Judges from history who lay voice to the rulings of the Father? Simple your Honor, because when the Father dispenses justice it is swift, absolute, and there is no comment necessary. The Father has spoken. Period. All Stop. End of Line.

I Am the father, and I have spoken. She will let my Children go, or I will haul her up onto the rock on which the Law was written and the Almighty will rain down plagues upon her head. Luckily for Defendant, he doesn't require frogs, flies, locusts, or even this Court's approval and/or permission to dispense this, Justice. God has armed the father in this case with Forever stamps and the singular ability to tear open any digital machine on Earth and place the message of what was done there.

I Am the father, and a mother "shall not bear false witness" to take my children from me. Period. All Stop. End of Line. In the name of our Lord Jesus Christ.

Wherefore, prepare the Rock for trial Your Honor. Defendant will happily attend Your Honor's hearing on November 14th at 8:30am and can't wait to hear more ~~false witness~~ from Plaintiff about how a hospital (the Cleveland Clinic), whom Defendant fired for medical malpractice, and has been withholding Defendant's medical records for more than two years to protect their employee from prosecution now suddenly has evidence Defendant has guns while living three states away. However, your Honor will need to send Defendant a Zoom invite link as Judge Tonya R. Jones has specifically ordered Defendant is not to approach the courthouse in person.

Further, Defendant has already been hauled out of his attorney's office without a warrant, while citing the Fourth Amendment and his Miranda rights and been illegally incarcerated in your jurisdiction. There is a standing capias warrant issued by a Judge for an alleged crime which still doesn't have a bill of particulars produced by Prosecution and for which Defendant have no assigned attorney in violation of his Sixth Amendment rights. Finally, there is still a stolen Kel Tec .32 caliber pistol in the wind, unaccounted for, and a \$1million murder bounty upon Defendant's head with the [REDACTED] police department having a history of terrorizing Defendant.

Your Honor's jurisdiction has already illegally incarcerated Defendant, and he will not travel back to Cleveland to repeat the process. Period. All Stop. End of Line. If your Honor doesn't like it...to bad. Defendant is already on the other side of the Red Sea beyond where your Honor's arrows can reach.

Defendant awaits your Honors Zoom invite for the 14th of November.

Respectfully Submitted,

William E. Horner

Date: 11/10/2022

William E. Horner

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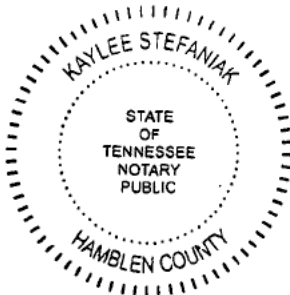
Defendant

State of Tennessee

County of Hamblen

William Easton Horner subscribed and sworn to (or affirmed) before me this 10 day of

November in the year 2022 of our Lord.



Kaylee Stefaniak (SEAL)

Signature of Notary Public

OS-26.25 Commission Expires

DEFENDANT AFFIDAVIT

This motion, and its contents, represent the truth, the whole truth, and nothing but the truth, to the best of my knowledge, and I swear to its validity under penalty of perjury through affixing my signature and seal.

William Easton Horner (SEAL)

11/10/2022 (Date)

William Easton Horner

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Morristown, TN 37814

williamehorner@gmail.com

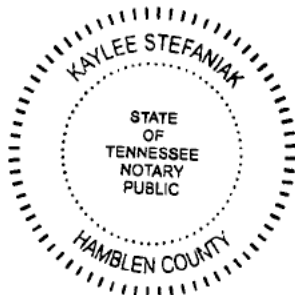
865.322.9331

Defendant, Pro Se

State of Tennessee

County of Hamblen

William Easton Horner subscribed and sworn to (or affirmed) before me this 10 day of November in the year 2022 of our Lord.



Kaylee Stefaniak (SEAL)

Signature of Notary Public

05-26-25 Commission Expires

CERTIFICATE OF SERVICE

A soft copy of the foregoing **DEFENDANT'S ANSWER TO COMPLAINT** was served upon Daniel F. Gourash via email on 11/10/2022 at his indicated email address dfgourash@sseg-law.com.

A soft copy of the foregoing **DEFENDANT'S ANSWER TO COMPLAINT** was served upon Amelia J. Leonard via email on 11/10/2022 at her indicated email address aleonard@sseg-law.com.

William Easton Horner (SEAL)

11/10/2022 (Date)

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Defendant, Pro Se