

**IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

CATHERINE M. STARK, <i>et al.</i>	)	CASE NO. CV-22-969917
	)	
Plaintiffs,	)	JUDGE BRENDAN J. SHEEHAN
	)	
v.	)	<u>PLAINTIFF'S MOTION FOR</u>
	)	<u>SUMMARY JUDGMENT AND</u>
WILLIAM EASTON HORNER, <i>et al.</i>	)	<u>SANCTIONS</u>
	)	
Defendants	)	

Now come Plaintiffs, Catherine M. Stark and Allison Marie Stark (“Plaintiffs”), by and through counsel, and pursuant to Rule 56(A) of the Rules of Civil Procedure, respectfully move for summary judgment on their claims against Defendant William Easton Horner (“Defendant”) and an order declaring Defendant to be a vexatious litigant in accordance with R.C. 2323.52, a permanent injunction on their claims for defamation, a hearing on their request for damages. Plaintiffs further request an award of attorneys’ fees and costs in accordance with R.C. 2323.51 for Defendant’s frivolous conduct during this matter which needlessly increased the costs of litigation and serve merely to harass both Plaintiffs and their counsel.

Summary judgment is appropriate as Defendant’s actions, both as set forth in the Verified Complaint and also over the course of this case, have amply demonstrated his vexatiousness. Summary judgment is also appropriate to grant Plaintiffs a permanent injunction and an award of damages considering Defendant’s continued publishing of defamatory statements. Finally, in light of Defendant’s willful, blatant, and contemptuous behavior during the course of this litigation, including the filing of multiple frivolous documents in this Court and repeatedly creating and posting videos containing content already determined by this Court to be defamatory, in violation of this court’s preliminary injunction, Plaintiffs are entitled to attorneys’ fees in accordance with R.C. 2323.51.

Amelia J. Leonard

From: Easton Horner <williamehorner@gmail.com>
Sent: Friday, February 17, 2023 11:54
To: Jayne Jakubaitis; Daniel F. Gourash; Amelia J. Leonard
Subject: Show Cause Hearing for March 8th at 8:30a

Good Day Jayne,

I wanted to let you know I received your notification about the show cause hearing scheduled for March 8th at 8:30a.

I am happy to attend the hearing via Zoom. Unfortunately, I will not be able to attend the hearing in person for safety reasons. My stolen Kel Tec .32 pistol has yet to be recovered and returned, and there is still a \$1million murder bounty on my head set by Judge Tonya R. Jones in the form of misappropriated life insurance policies held by Madam Stark Jr.

Given the wrongful arrests, harassment, and evidence fabrication by Rocky River police, as well as this court's covering up interference by the FBI, it's simply too dangerous to travel to Cleveland in person. The risk a RRPD officer pulls me over for a busted tail light, executes me, and then plants my stolen weapon on me claiming I pulled it on them is simply too high.

Once the stolen weapon is recovered and returned and the \$1million murder bounty is removed perhaps we can begin discussing in person hearings. Until then...Zoom will need to suffice.

Also, if Your Honor wants to get preliminary arguments out of the way he can watch my direct answer to this show cause summons on my YouTube channel. These arguments can be found here: <https://www.youtube.com/watch?v=lr7N1Tq53fA>

With Respects,
William E. Horner, Attorney Pro Se



Amelia J. Leonard

From: Easton Horner <williamehorner@gmail.com>
Sent: Thursday, March 16, 2023 09:52
To: Amelia J. Leonard; Daniel F. Gourash; Jayne Jakubaitis; Brendan Sheehan
Subject: Notice of Termination of Case CV 22 969917

Good Morning Jayne,

Please inform Judge Sheehan that without access to the documents which I require for discovery I WILL NOT MOVE FORWARD WITH THIS CASE.

The case is hereby terminated and all communications from this court will be returned to sender. All orders from the court, including the judges orders to remove my Rights 4 Fathers content is are hereby rescinded.

Kind Regards,
Easton Horner, Attorney Pro Se



IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

CATHERINE M STARK ET AL	)	CASE NO.: CV 22 969917
	)	
Plaintiff,	)	
	)	JUDGE: BRENDAN J SHEEHAN
v.	)	
	)	
WILLIAM EASTON HORNER ET AL	)	<u>DEFENDANT'S PETITION FOR</u>
	)	<u>DISCOVERY BY BRUTE FORCE ATTACK</u>
Defendant,	)	

Now comes Defendant, by pro se representation, and respectfully petitions this honorable court for a discovery orders, pursuant to each of the 84 Ohio Civil Rules, to compel the Cuyahoga County Court of Common Please Probate Court, **FBI, Rocky River Police Dept/Municipal Court, St. Vincent's Medical Center (SVCMC), and Cleveland Clinic Foundation** to produce lawful discovery relevant to this case. There are a total of 504 motions, certainly one of them should unlock this courts pathetic shell game your Honor...respectfully submitted.

Defendant also hereby cures the \$250.00 contempt of court charge in keeping with Section 31 U.S.C. 5103. As expressed in Defendant's YouTube videos, which are still live, \$250 doesn't cover half of the contempt Defendant has for the corruption this courthouse has allowed. So he's settled the public debt with 25,000 copies of the penny.

The penny is 97% zinc which has a raw ingot metal value of \$0.02. You've got ~\$500 in raw metal here your Honor if you melt it down. In good faith, now I feel my debt is paid. I settle this payment

in this particular fashion in civil peaceful protest citing 558 U.S. 310 (2010) in which the United States Supreme Court ruled that "money is speech."

Defendant also awaits his blue light chariot.

Wherefore, Defendant, by pro se representation, respectfully petitions this honorable court for discovery orders, pursuant to each of the Ohio Civil Rules via brute force attack, to compel the Cuyahoga County Court of Common Pleas Probate Court, FBI, Rocky River Police Dept/Municipal Court, St. Vincent's Medical Center (SVMC), and Cleveland Clinic Foundation to produce lawful discovery relevant to this case.

Respectfully Submitted,

_____ Date: _____

William E. Horner
2899 Blue Ridge Drive
Morristown, TN 37814
(865) 322-9331
williamehorner@gmail.com
Defendant

Amelia J. Leonard

From: Easton Horner <williamehorner@gmail.com>
Sent: Tuesday, May 2, 2023 09:53
To: Amelia J. Leonard; Daniel F. Gourash; Jayne Jakubaitis; Brendan Sheehan
Subject: Polite Ask Before New Contempt Motions

Hello Amelia,

In your last general pleading you complained about how I, "Didn't give you the ability to resolve the issues BEFORE filing my contempt motions." As if that would have made a difference LOL.

OK my dear...here's your chance, Please find at the links below the latest questions about your clients lies. I need answers please and thank you, and consider this your soft notice in "good faith" according to Rule 37. I file formal petitions for contempt later this week if you can't adequately explain the lies.

Also probably a good idea to advise your client that I'm going to be pressing the State Prosecutor, Mr. O'Malley for an indictment of telecommunications harassment over these admitted criminal actions. Definitely want to make sure she has earmarked adequate financial resources to defend herself. You know how expensive criminal AND federal civil court can be.

Kindly,
Easton

Red Handed Part 1 of 2
<https://youtu.be/XtgKnXeb8Pw>

Red Handed Part 2 of 2
<https://youtu.be/2S-9IGkCzDA>

PS Jayne and Judge Sheehan, I don't usually like to directly CC judges and staff attorney's motion paperwork, but the Clerk of Court is simply returning to sender my paperwork and payments without just cause. BTW...how is that receipt for payment of the \$250 contempt fine coming that you returned to me?



Amelia J. Leonard

From: Easton Horner <williamehorner@gmail.com>
Sent: Thursday, May 4, 2023 10:18
To: Jayne Jakubaitis; Daniel F. Gourash; Amelia J. Leonard
Cc: Brendan Sheehan; Top Dog; Cristy Miller
Subject: Fwd: Little bitches

Good Morning Jayne,

So according to Judge Sheehan's published workflows, discovery issues apparently need to be taken up with you. I was under the impression this was happening given Ms. Leonard and my rejuvenated dialog.

It seems instead however, that my PTSD suffering ex-wife who:

- 1) thinks I make threats of executing my children on my website,
- 2) had me illegally incarcerated in a mental institution, and
- 3) has a well established pattern of fabricating new criminal charges against me to try and distract from the pressures of her own lies and perjuries now being exposed;

has used her family's political influence to first trump up, then pass a forged signature through the CCCCPC criminal court and get issued a new Sherrifs warrant for my arrest.

I recognize it's not her fault Jayne. She suffers from PTSD. In fact I have serious ethical reservations about a hired gun attorney continuing to extract costs unders such questionable circumstances. As officers of the court their sworn ultimate duty is to uphold the law garner backroom deals with Mr. O'Malley. Is this the "Good Faith" and "Abuse of Discovery Process" they were talking about that they say THEY need protections over?

And they call me a vicious litigator. LOL

Final thing. I've already come to Judge Sheehan about the "retaliation" (LOL) and witness tampering being waged against me and my amicus witness (emails forwarded from string below). You'll notice specifically the line about "keeping the secrets that 'need' keeping" around here and us "being too loud."

Specifically madam his organization's ghosting the probate warrant records Judge Sheehan now can't find. Your Judge Sheehan will also rember the stolen millions dollars we reported to him in the initial witness tampering sworn testimony.

I recognize I am not an attorney madam, and you in fact are. You do what you feel is best. Just know you will be cited directly at federal proceedings. I would think a Zoom call with Judge Sheehan would be warranted.

Kind Regards and Humble Respect,
Easton Horner, Attorney Pro Se

PS. Please forgive what I know madam stark will consider aggressive titles. They are in fact specifically coded; this was under classified security formatting for the federal minuteman litigation pending. Remember madam...I'm emulating Jesus in this theatrical production.

Why the 2nd Amendment Exists Part 1 of 2

<https://youtu.be/JriMgdb9iJs>

Electronically Filed 05/19/2023 17:48 / MOTION / CV 22 969917 / Confirmation Nbr. 2862782 / CLMHB

Why the 2nd Amendment Exists Part 2 of 2
<https://youtu.be/Pkw3FnviouM>

CC: FBI Dir. Christopher Wray (aka Top Dog)

----- Forwarded message -----

From: **Easton Horner** <williamehorner@gmail.com>

Date: Tue, May 2, 2023 at 4:36 PM

Subject: Re: Little bitches

To: Top dog <tdcommand1@gmail.com>

Cc: cristy miller <millerbug83@gmail.com>

LOLOLOLOLOL

I love the we would be great candidates except we talk to much. Who here remembers the species 8472 email and going before Congress telling them how humble and discrete I am?

You don't want to email me I'm sure as the director of the FBI you can setup a firewall. But be advised if you do you'll probably miss some service motions for the federal court I'm about to haul you onto.

You can talk through email or I'll drag you in front of the Eastern district Federal Judge and we can talk in front of him.

Choose wisely Fido. And I hope you enjoy your continued ass whipping. #50to1

Munch Munch Munch
T3RMITE

On Tue, May 2, 2023, 3:26 PM Top dog <tdcommand1@gmail.com> wrote:

Ms. Miller,

You really do like to get drunk and spill your guts! I hope it's worth it to you though! I haven't sold any secrets to BRICS despite what you think you know. I suppose given the fact that you don't work for the government anymore you should be careful just what accusations you make. I would truly hate for it to seem like treason! Have a wonderful day!

Mr. Horner,

I could care less what you think you have that ex batch of yours. I have far more pressing matters to tend to. If you could keep your mouth and the little bit he's mouth shut the two of you would make perfect candidates for the project. You both like to talk way too much. It's all about keeping the secrets that need keeping around here. So please stop bothering me every day!

A.

Amelia J. Leonard

From: Easton Horner <williamehorner@gmail.com>
Sent: Friday, May 19, 2023 08:29
To: Matthew Baringer
Cc: Kristin L Wedell; Amelia J. Leonard; Daniel F. Gourash; cakozyk@cuyahogacounty.us; Jayne Jakubaitis
Subject: Re: St. Vincents' HIPAA lawsuit Discovery Disclosures...

Mr. Baringer,

Generally I would agree with your position that the Court and it's staff should not have to be included on these types of communications.

However, I've been instructed by the Ms. Kozyk and Ms. Jakubaitis, that the staff attorneys for the courts are supposed to be looped in to help resolve discovery disputes prior to formal papers being filed with the Court when and if they arise. My sole purpose was to bring to their attention the difficulties you may have in accessing some or all of the discovery evidence being provided to you because of the actions of your counterparts Ms. Leonard and Mr. Gourash to have such discovery hidden from your view. I don't want you coming to me later claiming, "He never gave me that..." Be advised, each time the discovery is taken down, I can only put it back up in fragments due to upload limits. You'll need to check back often to ensure you've seen everything that will be used in trial.

Given there is also confirmed documented evidence of the Court Clerk interfering with paperwork and passing forged signatures to trump up criminal arrest warrants against me on behalf of Ms. Leonard and Mr. Gourash, extra documentation for all parties is warranted. I appreciate the extra email this puts in everyone's inbox, however, as an attorney I'm sure you can appreciate that there is no such thing as OVER documentation when it comes to a corrupted courthouse deleting bogus probate warrants to have men illegally incarcerated in mental institutions.

Looking forward to your discovery answers and evidence. If there is anything I can provide to you in good faith, please don't hesitate to ask.

Easton

On Thu, May 18, 2023 at 6:08 PM Matthew Baringer <mbaringer@davisyoung.com> wrote:
Mr. Horner: The courts and their staff should not be copied on these types of communications.

Matthew P. Baringer
Partner



Davis & Young
A Legal Professional Association
35000 Chardon Rd.
Suite 100
Willoughby Hills, OH 44094

(216) 348-1700 – Main
(216) 377-2708 – Direct
(216) 621-0602 – Fax
mbaringer@davisyoung.com

From: Easton Horner <willamehorner@gmail.com>

Sent: Thursday, May 18, 2023 6:03 PM

To: Kristin L Wedell <kwedell@dmclaw.com>; Matthew Baringer <mbaringer@davisyoung.com>; Amelia J. Leonard <aleonard@sseg-law.com>; Daniel F. Gourash <dfgourash@sseg-law.com>; cakozyk@cuyahogacounty.us <cakozyk@cuyahogacounty.us>; Jayne Jakubaitis <CP1JJ@cuyahogacounty.us>

Subject: St. Vincents' HIPAA lawsuit Discovery Disclosures...

Good Afternoon Kristen and Matthew,

As we close out the week, I am looking forward to the discovery you both are securing for Judge Matia's case.

As we proceed, I wanted to let you know I am disclosing all the content and videos associated with Rights 4 Fathers.com and its associated YouTube channels as part of our case and all evidence will be used in the trial. These video and web content can be found online on both YouTube under the channel Easton Horner 1-19 as well as on Rights 4 Fathers com.

Be advised, Allison's other attorney's Ms. Leonard and Mr. Gourash are consistently working to take down this publicly available web content. As such it might be difficult for you to find. However, this does not change the fact it has been made publicly available to you and is active content that will be used in trial. You will need to secure your copies as I have made them publicly available.

If you are having difficulty accessing the information and content, you will need to take it up with Ms. Leonard/Mr. Gourash directly. However, your inability to access it will not excuse you from the content and will not keep it out of the public eye of the court. This email hereby notifies you of its existence, and its inclusion in our discovery process.

Kindly,
Easton Horner,
Attorney Pro Se

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

CATHERINE M. STARK, et al.,	)	CASE NUMBER: CV-22-969917
	)	
Plaintiffs,	)	JUDGE BRENDAN SHEEHAN
	)	
vs.	)	
	)	AFFIDAVIT OF MATTHEW BARINGER
WILLIAM EASTON HORNER, et al.,	)	
	)	
Defendants.	)	
	)	

IN THE STATE OF OHIO)
)
COUNTY OF LAKE)

The undersigned, being first duly sworn states as follows:

1. My name is Matthew P. Baringer, Esq.
 2. I am the defense attorney for St. Vincent Charity Medical Center in the case captioned *William Easton Horner v. Allison Marie Stark, et al.*, Cuyahoga County Court of Common Pleas Case No. CV-22-971495.
 3. Attached hereto is a true and accurate copy of an email I received from William Horner with respect to that case.
 4. Attached hereto is a true and accurate copy of Plaintiff's Petition for Discovery from SVCMC, which was received on or about May 9, 2023.
- Further Affiant sayeth naught.

MATTHEW P. BARINGER

SWORN TO BEFORE ME and subscribed in my presence, this ____ day of May, 2022.

NOTARY PUBLIC

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

WILLIAM EASTON HORNER	)	CASE NO.: CV 22 971495
	)	
Plaintiff,	)	
	)	JUDGE: DAVID T. MATIA
v.	)	
	)	
ALLISON MARIE STARK et al	)	<u>PLAINTIFF'S PETITION FOR</u>
	)	<u>DISCOVERY FROM SVCMC</u>
Defendant,	)	

Now comes Plaintiff, William Horner, by pro se representation who respectfully petitions this honorable court for an order compelling the SVCMC to provide discovery as defined in Ohio Civil Rule 26. Pursuant to Ohio Civil Rule 34, Plaintiff requests that SVCMC provide the information relevant to this case and related to Plaintiff's medical records and other evidence surrounding Plaintiff's incarceration in SVCMC from Aug. 20th 2020 – Aug. 25th 2020:

- a. Unredacted medical record for the probating incident Aug. 20th 2020 – Aug. 25th 2020.
- b. Unredacted meta-data associated with Plaintiff's medical record (for all time) data accesses, data entries, and data edits. Meta-data provided is to specifically include:
 - i. Timestamps for all data accesses and entries;
 - ii. Name of person making the access, entry, or edit;
 - iii. Whether the person making the access, edit, or entry made the entry while physically present on SVCMC property or working remotely;
 - iv. The medical qualification of the person making the access, edit, or entry.

- c. Unredacted security video footage of the night of Aug. 20th 2020 for the main receiving lobby for initial evaluation of citizens before they are taken to the main floor.
- Specifically, any and all footage that shows Plaintiff vocalizing his denial of an attorney in direct violation of ORC 5122 and the United States 6th Amendment.
- d. Disposition and elaboration around Plaintiff's list of question attached and incorporated herein as "Interrogatories 1"
2. The SVCMC has failed to provide the requested discovery through multiple trials including DR 20 382383, CV 22 969917, DV 22 391235, and this case itself despite Plaintiff's request for the same.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter an order compelling the SVCMC to provide the requested discovery within thirty (30) days of the date of this order.

Respectfully Submitted,

Date: _____

William E. Horner
2899 Blue Ridge Drive
Morristown, TN 37814
(865) 322-9331
williamehorner@gmail.com
Plaintiff

State of _____

County of _____

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

(SEAL)

Signature of Notary Public

Commission Expires

CERTIFICATE OF SERVICE

A soft copy of the foregoing **PLAINTIFF'S PETITION FOR DISCOVERY FROM SVCMC** was served upon Matthew P. Baringer attorney for Defendant SVCMC via email on _____ at his indicated email address mbaringer@davisyoung.com.

A soft copy of the foregoing **PLAINTIFF'S PETITION FOR DISCOVERY FROM SVCMC** was served upon Thomas W. Wright attorney for Defendant SVCMC via email on _____ at his indicated email address twright@davisyoung.com.

A hard copy of the foregoing **PLAINTIFF'S PETITION FOR DISCOVERY FROM SVCMC** was served upon Mr. Matthew Baringer and Mr. Thomas Wright, attorneys for SVCMC, via USPS mail on _____ at their indicated office address 35000 Chardon Rd. Suite 100, Willoughby Hills, OH 44094.

_____ (SEAL)

_____ (Date)

William Easton Horner

2899 Blue Ridge Drive Morristown, TN 37814

williamehorner@gmail.com

865.322.9331

Plaintiff, Pro Se

From: [Easton Horner](#)
To: [Matthew Baringer](#)
Cc: [Thom Wright](#); [Lisa Andrews](#); [Ryan Kun](#); [Alex Fath](#)
Subject: Re: CV 22 971495 Discovery Request
Date: Tuesday, May 9, 2023 11:32:01 AM
Attachments: [image001.png](#)

Mr Baringer,

I should probably also disclose to you that I am a duly sworn federal minuteman intelligence officer activated by Christopher Wray of the FBI to investigate corruption within the CCCCCP.

Should discovery not be provided in good faith, be advised I am fully authorized to crack the digital security of SVCMC and extract through Cyberforce those documents and evidence needed.

I don't want to do this, and won't as long as there is good faith communication and movement on getting discovery done between us. I have respect for SVCMCs digital systems.

However you can talk to Mr. Whitesell attorney of the Cleveland Clinic and ask him what happens to those who test these minuteman credentials and don't participate in good faith discovery. He can describe in detail the digital pains such extractions can you inflict.

Not making a threat, just making you fully aware of my minuteman credentials and my authorities should you decide not to comply with discovery in keeping with CCCCCP rules. It is my sincere hope we will be able to work together to arrive at the truth and such credentials and actions won't be needed.

Sincerely,
Easton Horner

On Tue, May 9, 2023, 11:05 AM Easton Horner <willamehorner@gmail.com> wrote:
Mr. Baringer,

"Posting" as in putting in the USPS.

Regarding how long you have to respond, this is simply a courtesy notice of the petition for discovery. I'm going to be filing with the Judge because you've been ignoring my requests for months now. You are correct, in Cuyahoga County I am not supposed to have to make such a petition, you are supposed to just do your job when asked. Alas, here we are.

Ms. Stark's questions and mirrored petition are attached.

Easton Horner

On Tue, May 9, 2023 at 10:58 AM Matthew Baringer <mbaringer@davisyoung.com> wrote:

I'm not sure what you mean by "posting" to the court. Discovery requests are not supposed to be filed with the court in Cuyahoga County. The rules govern how long I have to respond to them. I will respond to them per those rules, and will include any

objections I have. You also have to serve Ms. Stark's counsel with a copy of them (and serve me with any requests you made on her).

Matthew P. Baringer

Partner



Davis & Young

A Legal Professional Association

35000 Chardon Rd.

Suite 100

Willoughby Hills, OH 44094

(216) 348-1700 – Main

(216) 377-2708 – Direct

(216) 621-0602 – Fax

mbaringer@davisyoung.com

From: Easton Horner <willamehorner@gmail.com>

Sent: Tuesday, May 9, 2023 10:50 AM

To: Matthew Baringer <mbaringer@davisyoung.com>

Subject: CV 22 971495 Discovery Request

Good Morning Matt,

Please find attached the Discovery Petition I am going to be posting to the court tomorrow unless I receive written confirmation from you today that such a petition is not necessary because you are going to provide the requested items voluntarily in good faith.

1 THE STATE OF OHIO,)
 2) SS: **BRENDAN SHEEHAN, J.**
 3 COUNTY OF CUYAHOGA.)

FILED

4 IN THE COURT OF COMMON PLEAS

2023 MAY 19 P 2:37

CIVIL DIVISION

CLERK OF COURTS
CUYAHOGA COUNTY

5 **CATHERINE M. STARK, et al.,**)

6 Plaintiff,)

7 -v-)

Case No.

CV-22-969917

8 **WILLIAM EASTON HORNER, et**)

9 al.,)

C/A: **N/A**

10 Defendants.)

11 - - - -

12 TRANSCRIPT OF PROCEEDINGS

13 - - - -

14 APPEARANCES:

15 **DANIEL GOURASH, ESQUIRE, and AMELIA LEONARD, ESQUIRE,**

16 on behalf of the Plaintiffs;

17 **WILLIAM EASTON HORNER, PRO SE.**

18
19
20
21
22
23
24 Lorraine J. Klodnick, RDR, CRR
25 Official Court Reporter
Cuyahoga County, Ohio

1 THE STATE OF OHIO,)
 2) SS: BRENDAN SHEEHAN, J.
 COUNTY OF CUYAHOGA.)

3 IN THE COURT OF COMMON PLEAS

4 CIVIL DIVISION

5 CATHERINE M. STARK, et al.,)
 6 Plaintiffs,)
 7 -v-) Case No.
 8 WILLIAM EASTON HORNER, et) CV-22-969917
 al.,) C/A: N/A
 9 Defendants.)

10 - - - -

11 TRANSCRIPT OF PROCEEDINGS

12 - - - -

13
 14 BE IT REMEMBERED, that at the
 15 September A.D., 2022 term of said Court,
 16 to-wit, commencing on Monday, October 31,
 17 2022, this cause came on to be heard before
 18 the Honorable Brendan Sheehan, in Courtroom
 19 No. 22-C, Courts Tower, Justice Center,
 20 Cleveland, Ohio, upon the pleadings filed
 21 heretofore.

22
 23 - - - -
 24
 25

1 determination. The first assignment of error is
2 therefore overruled."

3 Did I read that correctly?

4 A. Yes.

5 Q. So what is your understanding of this order?

6 A. That the Court, the appeals court upheld the
7 divorce decree.

8 Q. Did it uphold the custody decree?

9 A. Yes.

10 Q. Did you ever [REDACTED] your children?

11 A. No.

12 Q. Did Cathy Stark ever [REDACTED] your children?

13 A. No.

14 Q. Has Mr. Horner sought to appeal with the Ohio
15 Supreme Court the divorce decree?

16 A. Yes.

17 Q. If you turn to Exhibit M as in Michael,
18 please. Have you seen this before?

19 A. Yes.

20 Q. What is it?

21 A. This is an appeal, a memorandum in support of
22 jurisdiction of Appellant William Easton Horner. I
23 believe this is the appeal to the Supreme Court of
24 Ohio, yes.

25 Q. If you turn to the 10th page of this, this

1 investigated by the FDA for any of those charges?

2 A. No.

3 Q. If you look down to the line 6, it says, "Top
4 dog confirms admission of guilt by Cathy Stark
5 regarding fraudulent claims to police." Do you see
6 that?

7 A. Yes, I do.

8 Q. Are you aware whether Cathy Stark ever
9 admitted guilt of fraudulent claims to the police?

10 A. She has not, no.

11 Q. Now, turning to Exhibit Q, please. Have you
12 seen this before?

13 A. Yes.

14 Q. What is this?

15 A. This is another printout from Mr. Horner's
16 website titled Wrongful Persecutions and Derelictions
17 of Duty By Police.

18 Q. Is this on the web site?

19 A. Yes, it is.

20 Q. How did you obtain it?

21 A. This was downloaded.

22 Q. Are the links live reflected in here?

23 A. Yes, they are.

24 Q. This is a true and accurate copy of what
25 appears on the Internet?

1 A. Yes.

2 Q. If you would look at the second line
3 referencing his apartment in Rocky River, do you see
4 that?

5 A. Yes.

6 Q. Under Summary. "Entrapment incident. RRPD
7 fabricates narcotics evidence and objection from the
8 FES process [REDACTED] children in
9 conspiracy with Allison and Cathy Stark." Do you see
10 that?

11 A. Yes, I do.

12 Q. Did you or Cathy Stark ever conspire to
13 fabricate narcotics evidence?

14 A. No, we have not.

15 Q. If you would look at the last line here
16 dealing with Rocky River, under the summary, it says,
17 "RRPD inciting fear about father stealing guns while
18 at the same time they fail to make an arrest of
19 Allison Stark, mother, who admits on police video to
20 [REDACTED] father's .32 caliber KelTec pistol." Do you
21 see that?

22 A. Yes, I do.

23 Q. Did you ever admit to [REDACTED] Mr. Horner's
24 .32 caliber KelTec pistol?

25 A. No.

1 THE COURT: Sorry,
2 Mr. Horner, did you not hear that?

3 MR. HORNER: Well, so she's
4 saying she never admitted to [REDACTED] it. Did
5 she ever [REDACTED] it?

6 THE COURT: You'll get a
7 chance to cross-examine her.

8 MR. HORNER: Oh, okay. Just
9 stick a pin on it.

10 BY MR. GOURASH:

11 Q. Turning to Exhibit R, have you seen this
12 before?

13 A. Yes.

14 Q. What is it?

15 A. This is a page from Mr. Horner's website. The
16 following communications have been sent to all 535
17 members of the U.S. Congress and this is -- let me
18 see. This is a true and accurate copy of what is
19 currently posted on the Internet and the links are
20 live.

21 Q. If you would look at Exhibit S, please.

22 A. Yes.

23 Q. What is this?

24 A. This is a copy of the PDF that is listed in
25 Exhibit R and this is Mr. Horner's letter that he

1 sent to all the members of the Congress.

2 Q. Okay. In this letter, it indicates that
3 Mr. -- FBI Directory Wray is waging an act of cyber
4 terrorism operation against US citizens in exchange
5 for valuable consideration. Do you see that?

6 A. Yes, I do.

7 Q. Have you or Cathy Stark participated with
8 Directory Wray in any act of cyber terrorism
9 operations against US citizens?

10 A. No.

11 Q. Under the first bullet point it says, "In the
12 past two years, Directory Wray and his team have:
13 Fabricated evidence in Cuyahoga Probate Court to have
14 me illegally incarcerated in a mental institution on
15 a bogus probate warrant. They did this in collusion
16 with my ex-wife to paint me as a crazy person and
17 [REDACTED] children." Do you see that?

18 A. Yes, I do.

19 Q. Did you ever fabricate evidence to have
20 Mr. Horner incarcerated on a bogus probate warrant?

21 A. No.

22 Q. Did you ever collude with the FBI to fabricate
23 evidence?

24 A. No.

25 Q. Has your mother, Cathy Stark, ever colluded

1 with the FBI to fabricate evidence?

2 A. No.

3 Q. Now, did there come a time when Mr. Horner was
4 in fact probated?

5 A. Yes.

6 Q. Can you tell the Court what happened?

7 A. After our separation in August of 2020, I
8 sought to have Mr. Horner probated for mental health
9 concerns. Before this point Mr. Horner had been
10 behaving in a way that made me very scared that he
11 was a risk to himself and his safety.

12 Mr. Horner had told me of mental health
13 concerns early on in our marriage and that included
14 suicidal thoughts and ideations and at that time his
15 behavior had been very concerning and I believed that
16 he would attempt to commit suicide given everything
17 in our marriage was not great at the time.

18 So I sought to have him probated in order to
19 ensure that he did not hurt himself after our
20 separation.

21 Q. Did you make any false statements in
22 connection with that probate effort?

23 A. No, I did not.

24 Q. At the bottom of Plaintiff's Exhibit F, it
25 says, "Hundreds of pages of documentation evidence

1 Q. Okay. And are your children identified by
2 name in this?

3 A. Yes, they are.

4 Q. This is [REDACTED] and [REDACTED] Trust Fund Repost2?

5 A. Yes.

6 Q. Directing your attention down to the center of
7 the page, it says, "On August 14, 2020, my ex-wife,
8 Allison Stark, [REDACTED] our children in the middle
9 of the night. For the past 742 days, she has been
10 working with corrupted government agents, including
11 director of the FBI, Christopher Wray, to
12 fabricate/obfuscate evidence to [REDACTED] [REDACTED] [REDACTED] my
13 children in the courts." Do you see that?

14 A. Yes.

15 Q. Did you ever [REDACTED] your children?

16 A. No.

17 Q. Did you ever work with corrupted government
18 agents?

19 A. No.

20 Q. Did you ever fabricate or obfuscate evidence
21 to [REDACTED] [REDACTED] [REDACTED] [REDACTED] your children?

22 A. No.

23 Q. The Domestic Relations Court of Common Pleas
24 of Cuyahoga County did that, is that right?

25 A. I'm sorry?

1 A. This one is titled "A big thank you to all who
2 are helping support Rights4Fathers.com. We saw a
3 0.25 terabyte month in August. That's the equivalent
4 of watching the..." And it says "Posted by
5 Easton Horner."

6 Q. There's a third link on that. Can you tell me
7 what that is?

8 A. This one is titled, "In the following sworn
9 statement, Allison Stark commits the same perjuries
10 she used to assassinate my character and blackball me
11 during our divorce..." "Shared by Easton Horner."

12 Q. Those are all links on LinkedIn to other
13 areas, is that correct?

14 A. Yes.

15 Q. Did you ever commit perjury?

16 A. No.

17 Q. Turn to the next page, page 3. There's a
18 reference to him being president of E Analytics, LLC.
19 What is E Analytics, LLC?

20 A. That is the name of the business that
21 Mr. Horner and I co-founded.

22 Q. If you turn to the page at the bottom
23 right-hand, it says 6 of 8, there are links on the
24 E Analytics page posted by Mr. Horner.

25 A. These, yes.

1 a post, it says, "Say hello to the FBI running
2 illegal cyber terrorism operations against me just
3 six doors down from my house in collusion with my
4 ex-wife, Allison Stark." Do you see that?

5 A. Yes.

6 Q. There's a link there to a video of Mr. Horner?

7 A. Yes.

8 Q. Have you ever been involved with running
9 illegal cyber terrorism in connection with the FBI?

10 A. No.

11 Q. Is that a false statement?

12 A. That's a false statement.

13 Q. Turn to Exhibit V, please.

14 Let me ask you this. When Mr. Horner posts on
15 LinkedIn, are you aware whether it gets published to
16 everyone on his network?

17 A. It appears that it does, yes.

18 Q. And have you received e-mails from people who
19 are within his network including posts that
20 Mr. Horner made?

21 A. Yes.

22 Q. If you turn to Exhibit Z, please. Do you have
23 that in front of you?

24 A. Yes, I do.

25 Q. What is that?

1 A. I corrected Mr. Gourash and said that this
2 says August 16th, 2022, and it lists 79 views.

3 Q. Okay. Now, does this post show the body cam?

4 A. Yes.

5 Q. So if you click on the link, the body cam of
6 the Rocky River police shows up?

7 A. Yes.

8 Q. Now, have you ever fabricated evidence?

9 A. No.

10 Q. Has your mother Cathy Stark ever fabricated
11 evidence?

12 A. No.

13 Q. In this document it indicates that "Since
14 August 14, 2020, my ex-wife, Allison Stark, and
15 mother, Cathy Stark, have been working with corrupted
16 law enforcement officers at Rocky River Police
17 Department (RRPD) to fabricate drug evidence against,
18 to use this evidence [REDACTED] [REDACTED] [REDACTED] my children in
19 the domestic relations court." Did I read that
20 correctly?

21 A. Yes.

22 Q. Was that a false statement?

23 A. Yes, that is false.

24 Q. Now, let me ask you to turn to Exhibit Y. Do
25 you have that in front of you?

1 A. Yes.

2 Q. What is this?

3 A. This is an e-mail to me and my mother from
4 Karla [REDACTED] from Sunday, August 14th, 2022.

5 Q. Is this a true and accurate copy?

6 A. Yes.

7 Q. Who is Karla [REDACTED]?

8 A. She is our [REDACTED].

9 Q. Okay. It indicates, "I received the e-mail
10 below from Easton Horner today. He appears to be
11 quite disturbed. Both links will connect you to a
12 GoFundMe link he created yesterday stating it is for
13 a trust with photos of both the children. He is
14 extremely unstable. I do encourage you both to get a
15 restraining order from him before he does something
16 unforgivable to either one of you."

17 A. Yes.

18 Q. Below in the e-mail chain is an e-mail from
19 Easton Horner that was forwarded to you by
20 Karla [REDACTED], is that right?

21 A. Yes.

22 Q. In that e-mail does it state, "On August 14,
23 2020, my ex-wife, Allison Stark, [REDACTED] our
24 children [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]. For the past
25 730 days she has been working with corrupted

1 government agents, including director of FBI
2 Christopher Wray, to fabricate/obfuscate evidence to
3 [REDACTED] [REDACTED] [REDACTED] my children in the courts." Do you
4 see that?

5 A. Yes.

6 Q. Is that a false statement?

7 A. That is a false statement.

8 Q. Below on that e-mail he alludes to a YouTube
9 account. Do you see that?

10 A. Yes.

11 Q. He also refers to Rights4Fathers website?

12 A. Yes.

13 Q. If you turn the page, there's a series of
14 screenshots. Do you see that?

15 A. Yes.

16 Q. Are those additional links?

17 A. I believe so.

18 Q. If you look at the last page, is there a
19 screenshot of a GoFundMe page we looked at earlier?

20 A. Yes.

21 Q. Within this same exhibit if you turn the page,
22 there's another e-mail from Kathryn [REDACTED]?

23 A. Yes.

24 Q. Dated Monday August 15, 2022?

25 A. Yes.

1 (Video played for Court and the
2 defendant.)

3 - - - - -

4 BY MR. GOURASH:

5 Q. Do you recognize the person in that video?

6 A. Yes.

7 Q. Who is it?

8 A. That is William Easton Horner.

9 Q. In that video, did he accuse you and your
10 mother of [REDACTED] your children?

11 A. Yes.

12 Q. Did he accuse you of [REDACTED] your children?

13 A. Yes.

14 Q. Did he accuse you of fabricating evidence?

15 A. Yes.

16 Q. Did he accuse you of perjury?

17 A. Yes.

18 Q. Are all of those statements false?

19 A. That is correct, they are all false.

20 Q. Miss Stark, I'd like to change subjects now,
21 talk to you a little bit about how these false
22 statements have impacted you.

23 What impact have these false statements had on
24 you?

25 A. It's immeasurable at this point. It's really

1 been large and unsettling. This has impacted my
2 work, my family relationships, my friendships, my
3 personal life, mental health, my physical well-being.
4 It's hard to list all of the ways that this has
5 impacted me because it is constant and ever present.

6 We live in fear of Mr. Horner. I am
7 consistently scared to hear what new things are
8 happening. We've had to seek a restraining order and
9 I have entirely too many relationships with police
10 officers and things like that now. It's all very
11 unsettling. It's impacting every aspect of my life.

12 Q. What impact, if any, has it had on your
13 relationship with your employer?

14 A. So it's had a pretty big impact. I have
15 had -- I attempted to not let it impact work, but
16 unfortunately it's become ever present and I've
17 needed to take time off of work to deal with this
18 situation.

19 So I was up for a promotion at the time that
20 Mr. Horner began this smear campaign and I have not
21 been able to secure that promotion at this time due
22 to everything that is going on with this.

23 I have had to inform coworkers, my supervisor,
24 HR, legal department, the police, the -- my employer
25 has their own police force. And it's impacted people

1 outside of that as well.

2 I have coworkers that I don't -- I mean, it's
3 a large department, I don't really know them, and at
4 one point I had to discuss this situation with The
5 Cleveland Clinic police in the office. That was the
6 only place that I was able to do it. And I had 10 to
7 20 coworkers witness this even though we were in a
8 private room. And then I had people come up to me
9 afterwards asking me what was going on. They were --
10 yeah, it's very unsettling. It's very difficult.

11 Q. What impact, if any, has the false statements
12 had on your relationship with your neighbors?

13 A. Our neighbors are, frankly, very concerned for
14 our safety. They are also very concerned for their
15 own safety. We've -- my family has lived in the same
16 neighborhood since I was a young child, so we know
17 just about everyone in the vicinity and Mr. Horner
18 has sent mail to all of them and it's -- they view
19 that as he knows where we live, he knows we're near
20 you, and they are actively distancing themselves from
21 us.

22 There are -- we've had neighbors stop by, ask
23 us how we are, ask us if we're safe, and then they
24 ask questions about Mr. Horner's whereabouts, whether
25 or not we're making sure he stays away from us,

1 whether or not he ever comes to the neighborhood.
2 Does he have any weapons, does he see the children at
3 all, are the kids' schools aware --

4 THE COURT: Dan, I have
5 to -- come on, this is defamation now. I
6 appreciate how this has affected her in regard
7 to the neighborhood, but let's keep it focused
8 here, all right?

9 MR. GOURASH: Thank you, Your
10 Honor. I'll pass the witness.

11 THE COURT: Okay.

12 Mr. Horner, you can ask and inquire
13 to the witness.

14 MR. HORNER: I guess the
15 first place I'd like to start, they've done a
16 very good job documenting what I've written,
17 Your Honor. I don't deny things I've written
18 or published, Your Honor. I'm still waiting
19 to hear evidence of falsehood, however, other
20 than Miss Stark's own testimony. I'm waiting
21 for like this evidence actually.

22 THE COURT: Here, you can
23 cross. You're not arguing to me right now,
24 William. You're asking questions of the
25 witness. Anything about what you wish --

1 A. All right. Yes.

2 Q. Let's see it.

3 MR. GOURASH: We put that
4 evidence on, Your Honor.

5 Q. Point it out to me.

6 A. Well, our -- you want evidence that I did not
7 perjure myself?

8 Q. Let's start with this. You say that you like
9 never fabricated drug evidence against me. You and
10 your mother have never fabricated drug evidence
11 against me, correct?

12 A. Correct.

13 MR. HORNER: Your Honor, have
14 you watched the Rocky River police video on
15 YouTube that she has a problem with? Your
16 Honor, have you watched it? If you watch it,
17 you'll like see her, like her mother talks
18 about [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
19 [REDACTED] [REDACTED] [REDACTED] [REDACTED]. Your Honor, that's
20 [REDACTED] [REDACTED] [REDACTED] [REDACTED]. Talks about it
21 right there. All made up, going to be given
22 to Melissa Seagro. It's right there on video.
23 You can watch it.

24 She says she's never perjured
25 herself. She has done it right here in these

1 chambers, Your Honor. I've been dealing with
2 this for two years.

3 Like, sir, my time is just as
4 valuable as hers. I'm sorry she's having
5 problems at work with the truth, but like
6 she's done some bad stuff, Your Honor. So
7 like I don't know what to say. I'm sorry.

8 She has no evidence to actually point
9 to, like no physical --

10 THE WITNESS: Mr. Horner, no.
11 I'm sorry. What you have said is demonstrably
12 false.

13 MR. HORNER: It is? Okay --

14 THE WITNESS: My mother did
15 not perjure herself and nor did I. We have
16 never been -- excuse me, we have never been
17 convicted -- that all of your motions that you
18 submitted accusing people of perjury, have
19 been denied. That is demonstrably false.
20 Also, if you -- excuse me, I'm speaking. If
21 you listen --

22 MR. HORNER: Your Honor, I
23 have no more questions for this witness.
24 We're done. Thank you. I don't need any more
25 from her. We're done. Thank you.