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CLERK OF COURTS
CUYAHOGA COUNTY

IN THE COURT OF COMMON PLEAS
DOMESTIC RELATIONS DIVISION
CUYAHOGA COUNTY, OHIO

ALLISON HORNER	:	CASE NO. DR 20 382383
	:	
Plaintiff	:	JUDGE TONYA R. JONES
	:	
-VS-	:	
	:	
WILLIAM HORNER	:	<u>DEFENDANT'S REJECTION OF TRIAL ORDER</u>
	:	<u>SUBMITTED IN CIVIL DISOBEDIANCE</u>
Defendant	:	
	:	

Now comes Defendant, **WILLIAM HORNER**, by Pro Se representation, and rejects the issued Trial Order in civil disobedience.

This Court's "status quo" as the Magistrate put it is untenable and it's idea of "Justice" has been to enable the Plaintiff to steal my stuff, abscond with my children in the middle of the night, try and extort money, slander, libel, perjure, inject false testimony, criminally cyberstalk, mentally abuse, illegally incarcerate, and refuse to provide me my tools and equipment I need to earn all without consequence. At the same time, this Court denies me access to confidential council, holds my children ransom, and leaves them with a mother who would rather burn the \$6k of her daughter's education fund than admit she couldn't even keep her own life insurance policies in place in compliance with this Court's written orders. I do not contest that this Court has done these things and will not go to trial. I contest this Court has the power to do these things in the first place.

This Court should not have the ability to take a father's children from him for a year without evidence based solely on the lies of a spurned mother. This Court should not have the ability to force a

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father to appear before it, him having been denied all rights to confidential council through first being hauled out of his attorney's office without a warrant in August 2020 to this Court's final inaction regarding the Plaintiff's illegal cyberstalking in April 2021. This Court should not be empowered to force a father to face divorce in a state of mental abuse by a spurned mother all the while denying him the very machine which is part of his documented safety plan to heal from that abuse for more than a year.

Defendant has nothing left to say to this Court and his comments are now for the Appellate Court sitting behind this one. Defendant stands in civil disobedience and will produce no records, answer no questions, submit no evidence, and appear for no trial until:

1. Defendant is reunited with his children.
2. The Plaintiff is prosecuted/arrested for her criminal behavior ranging from perjurious affidavits submitted to this Court, to ignoring Your Honor's orders on multiple occasions and counts, to her abusive cyberstalking which almost led to Defendant's death. (Formal IC3.gov complaint attached in Exhibit A.)
3. Defendant is made financially whole from the \$35K+ damages wrought over the past year through the Plaintiff's criminal behavior.

Defendant assumes this Court has no intention of administering Justice and does not trust in its ability or Judgement to do so. Therefore, Defendant simply requests his divorce be signed so he can proceed to the Appellate Court. Defendant will not submit to this Court and its tyranny any longer.

Further, the Defendant notifies this Court that Defendant chooses to protest this treatment through economics. Defendant will not fund this Court's lunacy and will pay no Court costs, no attorney's fees, no child support, and no ordered sanctions/fines. The Defendant would also like to remind Your Honor the Supreme Court of the United States has determined that money equals speech and any attempt to forcibly remove money from Defendant's accounts will be viewed as a direct

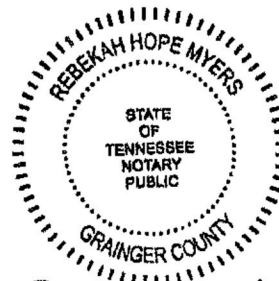
violation to a citizen's first amendment rights to peacefully protest their government to redress grievances through the powers granted them in Free Speech.

WHEREFORE, Defendant rejects Your Honor's Trial Order in civil disobedience.

Submitted in civil disobedience in keeping with
the time-honored tradition of a Citizen's right to
peacefully protest and petition the Government
to redress grievances according to the freedoms
enshrined in the First Amendment to the United
States Constitution's Bill of Rights,

William E. Horner - Date: 8/3/2021

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



Rebekah Hope Myers 8/3/21
Commission Expires 3/1/25

CERTIFICATE OF SERVICE

A copy of the foregoing DEFENDANT'S REJECTION OF TRIAL ORDER SUBMITTED IN CIVIL DISOBEDIANCE was served upon Robert A. Marcis, Attorney for Plaintiff, via email at rmarcis@marcislaw.com on this 3rd day of August 2021.

**Complaint Referral Form
Internet Crime Complaint Center**Exhibit
A**Victim Information**

Name: William Easton Horner

Are you reporting on behalf of a business? [None]

Business Name:

Is the incident currently impacting business [None]
operations?

Age: 30 - 39

Address: 2899 Blue Ridge Drive

Address (continued):

Suite/Apt./Mail Stop:

City: Morristown

County: Hamblen

Country: United States of America

State: Tennessee

Zip Code/Route: 37814

Phone Number: 8653229331

Email Address: easton.horner@swordandshieddigitalsecurity.tech

Business IT POC, if applicable:

Other Business POC, if applicable:

Description of Incident

Provide a description of the incident and how you were victimized. Provide information not captured elsewhere in this complaint form.

Hello,

My name is Easton Horner, and I am a certified data scientist with a specialty in cybersecurity. I would like to report what I believe to be a Federal and Tennessee crime committed against me for more than six months by my estranged wife, Allison Horner, which was directly responsible for the incident of the night of October 31st, 2020 between me and the Knoxville Police Department.

In summary, Allison hacked the national telecommunications provider, Republic Wireless, and illegally accessed the content of my private phone text messages. She then used this illegally obtained information to harasses and abuse my mental health condition so she could paint me as a crazy man and convince the Domestic Relations Court of Cuyahoga County, Ohio to remove all parental visitation with my children. It was this sustained harassment and abuse of my PTSD mental health condition which led to the incident the night of October 31st, 2020.

In the interest of full disclosure, it is worth mentioning filing this police report will have positive effect on my divorce case. While a secondary benefit, this is not the primary reason for my report. I make this report because as a certified cybersecurity specialist, I believe Allison's hack to be a zero-day security vulnerability in the nation's telecommunication network. My primary reason for this report is to get this gap closed.

Having been on the divorce circuit for nearly a year now, I've learned that estranged spouses do all sorts of things to hack their partner's phones, from installing cloning malware to inserting child safety suites to track geo-locations. However, there is an important distinction between what Allison did and these more "benign" actions. As

a cybersecurity specialist, I wiped my phone returning the device to factory defaults upon our separation. In other words, Allison didn't hack my phone. She hacked the Republic Wireless network and accessed my phones text message content through it.

Allison admitted these crimes in a Family Evaluations Services hearing with Director Melissa Seagro and again to the Honorable Judge Tonya R. Jones of the Cuyahoga County Domestic Relations Court in open Pre-Trial. While being ignorant of the finer technical details differentiating hacking Republic Wireless vs. me directly (they are not cybersecurity specialists) both ladies can corroborate my story and Allison's admission of the hack. This is the evidence I bring to support my allegations. I have already requested the Honorable Judge Jones notify the appropriate agencies. The email communication between myself and her staff attorney, Sharon Ross is attached.

The means by which Allison was able to accomplish her hack haven't yet been determined. To try and get to the bottom of this, I met personally with Jerry Jeske, Dir. of Operations, Republic Wireless and told him what I knew. Allison claimed her way into the network was to use the "Republic Anywhere" capability. Somehow when using a tablet device, there is a way to "choose" which phone number on the account you want to download text message content. This choice is not given on either PC or mobile versions of the website and is tablet specific. In her own words it was a "glitch." From this exploit she simply assigned my number to the tablet account and began accessing my data. I had been working with Jerry in good faith to try and get to the bottom of the issue, but after he spoke with in house council, all communication ceased. My guess is they understand the civil liability they face and have cut me off as a potential lawsuit. A lawsuit I reserve the right to file once this mess is untangled.

As I said, my primary concern now is the zero-day security vulnerability in the nation's telecommunications grid. Allison's vulnerability reasonably penetrates every shared plan on the Republic Wireless network. We're talking about illegally accessing the content of private text message data. Does your bank use two factor text authentication? Mine does...

With the technical details and descriptions out of the way, I now want to talk about damages. These are the personal reasons I am filing this report. I am a victim of these crimes and have suffered greatly. I demand justice and ask Allison be arrested immediately. With respects, on the night of October 31st I almost died because of her abuses. You know this, because one of your officers saved me that night.

The night of the 31st was the breaking point of a long mental abuse campaign. As I told the Officers that night, I was an intelligence recruit in the rising freshman class of 2005. I never served, but was well trained as part of the selection process and was one of the best at social engineering hacking and cybersecurity. These talents were first identified at the United States Air Force Academy during my Summer Seminar. It is the reason I am a professional data scientist and cybersecurity specialist today. But this training was intelligence recruiting post 9/11 during the Bush era. PTSD came with the territory.

Then when our Daughter was born pre-mature at just 27w4d of gestation I faced another severe trama in the 104 day NICU stay while she fought for life. We were running our own business at the time, and I was pulling 100+ hour work weeks in crisis management mode with very little sleep all to fund the bills to keep her alive. In essence [REDACTED] herself, specifically her absence, became a PTSD trigger for me.

I do not deny I have PTSD. I have a legitimate disability. That's what makes this crime so heinous, especially from an estranged spouse. Allison was using her illegal insider information to further abuse my PTSD condition to paint me out as a crazy person and deny me all access to my children. Father's rights are nearly non-existent in Ohio where mental health is concerned. I have not seen my children for 336 days because of her actions. Specifically:

1. Allison was eavesdropping on the confidential attorney/client communications I was having to try and defend myself and gain access to my children making all attempts and funds spent ineffective.
2. Allison was eavesdropping on my confidential doctor/patient communications I was having to try and get my PTSD condition under control and then twisting the information around to tease me into PTSD attacks just like the one which resulted in the night of the 31st which almost led to my death.
3. The hack on Republic Wireless to access my text message content was done after/in conjunction with hacking

into my private password protected email account and stealing confidential email communications as part of her involuntarily committing me to St. Vincent's through false testimony. This was done on a probate warrant which I have confirmed as forged through a copy obtained by the Westlake Police Department. No original probate warrant can be sourced at the Probate Court as the record has been "expunged".

These are just the most egregious because there is a clear understanding of confidential exchange between doctor/patient and attorney/client. But to be honest each individual message string bears its own violation. For example, she was able to peep on the intimate and highly explicit text messages and photos between me and my then girlfriend. This feels very much like sexual assault. She was accessing text message strings between me and my professional network where we exchange client confidential information between each other in our professional capacities for mutual clients. These actions carry severe consequences.

If I had to call this crime something, I would call it a focused cyberterrorism campaign. I lived in Hell because of this mental abuse of my PTSD condition. But I recognize I am not objective in this instance. I have therefore come to the Knoxville Police Department, asserted this sworn affidavit, will cooperate in any way possible, and request Allison's arrest immediately.

Which of the following were used in this incident? (Check all that apply.)

- ☐ Spoofed Email
☐ Similar Domain
☐ Email Intrusion
☒ Other Please specify: Hacking into private text message content

Law enforcement or regulatory agencies may desire copies of pertinent documents or other evidence regarding your complaint.

Originals should be retained for use by law enforcement agencies.

Information About The Subject(s) Who Victimized You

Name: Allison Marie Horner (Stark)
Business Name:
Address: [REDACTED]
Address (continued):
Suite/Apt./Mail Stop:
City: [REDACTED]
Country: United States of America
State: Ohio
Zip Code/Route: [REDACTED]
Phone Number: [REDACTED]
Email Address: [REDACTED]
Website:
IP Address:

Other Information

If an email was used in this incident, please provide a copy of the entire email including full email headers.

[No response provided]

Are there any other witnesses or victims to this incident?

Yes. Judge Tonya R. Jones of the Domestic Relations Court, Cuyahoga County, Ohio. and Melissa Seagro, Director of Family Evaluation Services, Cuyahoga County, Ohio. Allison admitted her crime to both these women separately first in a FES hearing with Ms. Seagro and then again to Judge Jones in open Pre-trial.

If you have reported this incident to other law enforcement or government agencies, please provide the name, phone number, email, date reported, report number, etc.

Reported to the FBI Knoxville Office 865.544.0751 under option 2 national security. Made full statement under recording to agent on 7/19/2021. No report number given.

Reported to the Tennessee Bureau of Investigation on 7/19/2021. Made full statement and provided sworn affidavit described in "Description of Incident" above to Officer Richard Rodriguez (#440). 865.549.7800 richard.rodriquez@tn.gov. No report number given.

Reported to Hambleton County Sheriff's Office on 7/19/2021. Made full statement. Incident Report Number: 210700783

☐ Check here if this an update to a previously filed complaint:

Who Filed the Complaint

Were you the victim in the incident described above? Yes

Digital Signature

By digitally signing this document, I affirm that the information I provided is true and accurate to the best of my knowledge. I understand that providing false information could make me subject to fine, imprisonment, or both. (Title 18, U.S. Code, Section 1001)

Digital Signature: William Easton Horner

Thank you for submitting your complaint to the IC3. Please save or print a copy for your records. ***This is the only time you will have to make a copy of your complaint.***

Exhibit A.