

## ENTITLED RELIEF FROM COMPLAINTS

**Under the Rule of Law and the Rules of the Court, Stephen R. Lilley is entitled to the following requested judgments by Default;**

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**November 7, 2007, Plaintiff Stephen R. Lilley filed a Complaint for Civil Professional Tort, Case Number 07CV69736; Lilley, Stephen R. vs. Suttman, Patricia ... with Jury Demand.**

**Plaintiff: Stephen R. Lilley**  
**Vs.**  
**Defendants: Patricia Suttman**  
**Brenda Dunlap**  
**Pamela Lilley**

### **Entitled Relief from Complaint on Case Number: 07CV69736**

**WHEREFORE, Plaintiff Stephen R, Lilley, hereby respectfully requests that this Court enter judgment in his favor and against all defendants as follows:**

- A. AN AWARD against defendants, jointly and severally, for plaintiff's damages in the first, second, and third causes of action herein, along with interest and costs thereon.
- B. AN ORDER that all money and property converted and misappropriated by defendants, all proceeds thereof, be impressed with a constructive trust in favor of plaintiff.
- C. AN AWARD against defendants, jointly and severally, of punitive damages and exemplary damages of \$1,000,000.
- D. As to defendants, an accounting of all monies handled by them from the plaintiff or on behalf of plaintiff, or received for the plaintiff by the defendants.
- E. AN AWARD against defendants, jointly and severally, for judgment of fraudulent conduct in an amount in excess of \$1,000,000.
- F. Plaintiff further prays that this Court grant to its any and all further relief, equitable and at law, to which it may be entitled as found to be fair, equitable and appropriate.

**November 15, 2007, Plaintiff Stephen R. Lilley filed a Complaint for Civil Professional Tort, Case Number 07CV69823; Lilley, Stephen R. vs. Suttman, Patricia... with Jury Demand.**

**Plaintiff: Stephen R. Lilley**

**Vs.**

**Defendants: Brenda Dunlap, individually, and as Co-Administrator of the Estate of Marion G. Lilley, Deceased**

**Jackson C. Hedges, individually, and as Co-Administrator of the Estate of Marion G. Lilley, Deceased**

**Entitled Relief from Complaint on Case Number: 07CV69823**

**WHEREFORE, Plaintiff Stephen R, Lilley, hereby respectfully requests that this Court enter judgment in his favor and against all defendants as follows:**

- A. AN AWARD against defendants, jointly and severally, for plaintiff's damages in the first and second causes of action herein, along with interest and costs thereon.
- B. AN ORDER that all money and property converted and misappropriated by defendants, all proceeds thereof, be impressed with a constructive trust in favor of plaintiff.
- C. AN AWARD against defendants, jointly and severally, of punitive damages and exemplary damages of \$1,000,000.
- D. The Plaintiff prays that a writ of mandamus be issued to Defendants Dunlap and Hedges recover and distribute the monies owed to Plaintiff Stephen R. Lilley under their powers and duties of the administration of the Estate of Marion G. Lilley.
- E. AN AWARD against defendants, jointly and severally, for judgment of fraudulent conduct in an amount in excess of \$1,000,000.
- F. Plaintiff further prays that this Court grant to its any and all further relief, equitable and at law, to which it may be entitled as found to be fair, equitable and appropriate.

**November 21, 2007, Plaintiff Stephen R. Lilley filed a Complaint for Civil Professional Tort, Case Number 07CV69890; Lilley, Stephen R. vs. McGowan, Jack C. ... with Jury Demand. (Consolidate with Case Number 06CV66195)**

**Plaintiff:                    Stephen R. Lilley**  
**Vs.**  
**Defendants:                  Jack C. McGowan**

**Entitled Relief from Complaint on Case Number: 07CV69890**

**WHEREFORE, Plaintiff Stephen R, Lilley, hereby respectfully requests that this Court enter judgment in his favor and against all defendants as follows:**

- A. That Plaintiff Stephen R. Lilley be awarded compensatory and special damages from Defendant Jack C. McGowan in the First Cause of Action.
- B. That Plaintiff Stephen R. Lilley be awarded compensatory and special damages from Defendant Jack C, McGowan in the Second Cause of Action.
- C. That plaintiff is awarded punitive damages from the defendants in this action.
- D. That the plaintiff recovers his damages and all other equitable relief to which he may be entitled.
- E. That the plaintiff is awarded his costs and attorney fees in this matter and interest on any award from the date of filing this complaint.

### ***Probate Courts - A Long History of Corruption***

Many presume that the function of the probate court is to protect the widows, orphans, and trust beneficiaries, whose estates are the subject of proceedings which are administrative in nature.

The reality, however, is the opposite of this. The probate court's chief function is really to enrich the lawyers who cavalierly plunder these estates. Examples abound in the literature, of largess in dispensing of generous probate fees.

See Philip M. Stern, *Lawyers on Trial* (Times Bks, 1980), chapt. 4, "Where There's a Will, There's a Probate Lawyer"; and Norman F. Dacey, *How to Avoid Probate!*, 5th ed. (HarperPerennial, c1993) which states (at p.23): "The probate system, conceived generations ago as a device for protecting heirs, has now become their greatest enemy. Almost universally corrupt, it is essentially a form of private taxation levied by the legal profession upon the rest of the population. All across the land, both large and small estates are being plundered by lawyers specializing in "probate practice.".

City National Story is yet another example of probate court robbery.

<http://www.CityNationalStory.com> - *A true story of judicial corruption*

Out of the nearly quarter million dollars the Co-administrators (Dunlap and Hedges) stole were not all probate assets, \$150,000 were non-probate assets. \$100,000 was the personal property of Stephen Lilley and \$50,000 was the personal property of Christopher Lilley. Christopher died seven years after his money was stolen, never to receive it.

It has never been determined on the exact whereabouts of the stolen quarter million. Dunlap, Hedges, and Powell circumvented statutory laws ORC 2109.32 "Hearing on fiduciary's account" and 2115.16 "Hearing on inventory". The heir of the estate, Stephen R. Lilley was never allowed to review the fiduciaries accountings. Dunlap also refused to comply with Federal Law (U.S.C. Rule 34) "Production of Documents and Things"; again, the Plaintiff Stephen R. Lilley was not allowed to review the fiduciaries accountings. These are both violations under 18, U.S.C., Section 242 Deprivation of Rights under Color of Law and 18, U.S.C., Section 241 Conspiracy against Rights.

Although the Co-administrators, Court of Appeals, and two other judges confirmed that the \$150,000 of non-probate assets were comingled with the probate assets, the fiduciaries did not disclose the non-probate assets in their inventory. Dunlap had fabricated both federal and state documents in order to conceal the true identity of ownership in violation of federal and state statutory laws.

Out of nearly a dozen FBI Special Agents that I spoke with on addressing these issues, four had expressed their opinion that this was a case of Public Corruption.

Sincerely,

Stephen R. Lilley