

**IN THE COURT OF COMMON PLEAS OF FRANKLIN COUNTY, OHIO
CIVIL DIVISION**

Shayla D. Favor, Prosecuting Attorney	:	
Franklin County, Ohio	:	
373 South High Street	:	Case No.:
Columbus, Ohio 43215,	:	
	:	Judge
Plaintiff,	:	
	:	
v.	:	
	:	
Antoie L. Harris	:	
1674 Cleveland Avenue	:	
Columbus, Ohio 43211,	:	
	:	
Defendant.	:	

**COMPLAINT
INCLUDING REQUEST FOR INJUNCTIVE RELIEF
(Preliminary Injunction Hearing and Consolidation with Trial on Merits Requested)**

FIRST CLAIM (PERMANENT INJUNCTION)

1. Plaintiff Shayla D. Favor is the Prosecuting Attorney of Franklin County, Ohio, serving under the authority of Ohio Revised Code Chapter 309, and brings this action seeking preliminary and permanent injunctive relief pursuant to Ohio Revised Code Section 2950.034.
2. Defendant committed either a sexually oriented offense(s) that is not a registration-exempt sexually oriented offense and/or a child-victim oriented offense(s) after July 1, 2007.
3. Defendant was convicted of, or has pleaded guilty to Gross Sexual Imposition, in violation of R.C. 2907.05, which is defined as a sexually oriented offense.
4. Defendant is a resident at certain real property known as 1674 Cleveland Avenue, Columbus, Ohio 43211, Tax district City of Columbus, Parcel No. 010-054229-00, located in Franklin County, where said Defendant establishes and conducts the violation which is the subject of this Complaint.

5. The property described in paragraph 4 of this Complaint is located within 1,000 feet of Sonshine Christian Academy, defined as school(s), preschool(s) and/or child day-care center(s) premises for the purposes of Ohio Revised Code Section 2950.034.
6. Defendant, on the property described in paragraph 4 above, has violated the provisions of Ohio Revised Code Section 2950.034 in the following particular, to wit: Defendant, having been convicted of or having pleaded guilty to either a sexually oriented offense that is not a registration-exempt sexually oriented offense or a child-victim oriented offense resides in a location that is within 1,000 feet of Sonshine Christian Academy.
7. Defendant has refrained from abating and removing the said violation and persists in continuing the said violation by remaining at that address.
8. Plaintiff requests that this Court permanently enjoin and restrain the Defendant from maintaining his residence at 1674 Cleveland Avenue, Columbus, Ohio 43211, in violation of Ohio Revised Code Section 2950.034.
9. Plaintiff specifically requests this Court to order Defendant to immediately and permanently vacate the premises at 1674 Cleveland Avenue, Columbus, Ohio 43211. By reason of the foregoing, Plaintiff has no adequate remedy at law.

SECOND CLAIM (PRELIMINARY INJUNCTION)

10. Plaintiff repeats the allegations contained in paragraphs 1 through 9 of this Complaint as if expressly rewritten herein.
11. Plaintiff submits that unless Defendant is immediately restrained by this Court, pending the final hearing and determination of this action, Defendant will continue to maintain a residence at 1674 Cleveland Avenue, Columbus, Ohio 43211, Tax district City of Columbus, Parcel No. 010-054229-00, located in Franklin County, in violation of Ohio Revised Code

Section 2950.034, to wit: maintaining a residence within 1,000 feet of Sonshine Christian Academy.

12. Plaintiff submits that such action by the Defendant will result in damage or prejudice to others and to the public.
13. Plaintiff submits that the issuance of a preliminary injunction by this Court pending the final hearing and determination of this action will not cause undue inconvenience or loss to the Defendant.

WHEREFORE, Plaintiff prays for the following relief:

- a. The issuance of an order for a preliminary injunction enjoining the Defendant, pending the final hearing and determination of this action, from maintaining the violation of Section 2950.034 of the Ohio Revised Code as set forth herein; and
- b. The issuance of an order consolidating the hearing upon the application for preliminary injunction with a trial on the merits; and
- c. The issuance of orders containing mandatory injunctions that the Defendant be perpetually enjoined from maintaining in any manner contrary to Ohio Revised Code Section 2950.034 the violations set forth herein, and that the Defendant be ordered to prevent, abate, and remove said violations; and
- d. The issuance of orders requiring the Defendant to immediately vacate the premises and imposing substantial sanctions for noncompliance; and
- e. The issuance of orders that all costs of this action be assessed against the Defendant.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

**SHAYLA D. FAVOR
PROSECUTING ATTORNEY
FRANKLIN COUNTY, OHIO**

/s Patrick A. Stevens

Patrick A. Stevens (0103430)

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Attorney for Plaintiff

INSTRUCTIONS FOR SERVICE

TO THE CLERK OF COURTS:

You are instructed to make service by Sheriff to the Defendant at the address set forth in the caption of this Complaint.

/s Patrick A. Stevens
Patrick A. Stevens (0103430)
Assistant Prosecuting Attorney