

IN THE COURT OF APPEALS OF THE STATE OF OREGON

UPON THE PETITION OF)	
)	
Richard William Hoffmann,)	Clackamas County Case No. 19DR03090
)	
Plaintiff-Appellant or)	MOTION TO DISMISS APPEAL
Plaintiff-Respondent)	
)	
AND CONCERNING)	RESPONSE - ORDER TO SHOW CAUSE:
)	RE: MODIFICATION OF JUDGMENT re:
)	- Child Custody
DeeAnn Rae Johnson,)	- Parenting Time
)	
Defendant-Respondent, or)	
Defendant-Appellant)	

COMES NOW the Plaintiff-Respondent, Richard William Hoffmann, Sr. of 123 SW Oregon Trail Drive, Dallas, OR 97338, in response to Defendant-Respondent, DeeAnn Rae Johnson, of 4121 Norfolk Street, West Linn, OR 97068, in that given the facts and evidences of all occurrences and violation of Court procedure conducted by all Courts revolving asround this case, and ALL other related Court cases upon the evidenced child-abduction, child imprisonment, and transportation of minor children over state lines against the approval of Plaintiff-Respondent, Richard William Hoffmann, Sr., committed by DeeAnn Rae Johnson, et al, Defendant-Respondent:

That ALL concerned parties are hereby noticed that the Plaintiff-Respondent, Richard William Hoffmann, Sr., is exercising all his right and refusing NONE to apply for this Motion to Dismiss Appeal upon the fact:

1. The Commission on Judicial Fitness and Disability found the actions of the Honorable Judge Susie L. Norby to be fully exonerated on Friday, December 13, 2019, even though the Plaintiff-Respondent, Richard William Hoffmann, Sr.

included in his official complaint blatant acts of violation identified in Section 8 of the Oregon Constitution upon:

- a. The Honorable Judge Susie L. Norby's decision and Order listed in "Item #2,

Facts and Findings. The Court considered (ONLY) the:

- i. **Documents on file herein**
- ii. **Evidence presented and**
- iii. **Testimony of the PETITIONER [EMPHASIS ADDED!!!]**

2. Which evidences the Honorable Judge Susie L. Norby in **DIRECT VIOLATION of Section 8 of the Oregon Constitution upon:**

- a. **(b): Willful misconduct**
- b. **(c): Willful or persistent failure to perform duties**
- c. **(d): General incompetence**

Including but not limited to:

- d. **(e): Willful violation of any rule**

...upon the evidence that the Honorable Judge Susie L. Norby did not perform her duties to acknowledge nor consider any of the documents, evidence, and testimony of the Plaintiff-Respondent, Richard William Hoffmann, Sr. **AND** the fact the Plaintiff-Respondent, Richard William Hoffmann, Sr. entered a plethora of other evidences of misconduct committed by the judicial officers of ALL other Courts related to this case, specifically:

1. State of Iowa, County of Polk for the illegal transfer of venue to the State of Oregon effective January 7, 2015, upon the claim that Plaintiff-Respondent, Richard William

Hoffmann, Sr. did not contest said Order during a hearing on February 22, 2015 that was generated as a result his OBJECTION!

2. The fact the Iowa State Supreme Court, Attorney Disciplinary Board is evidenced it was severely influenced by an exterior third-party in 2011 upon their full exoneration of Jonathan Allen Coy, Esquire nearly 60 days AFTER HE REFUSED TO ENTER ANY RESPONSE WHATSOEVER TO CONTEST said EVIDENCE [Five (5) page cover and 61 pages of Internal Revenue Service and State of California Income Tax Returns, 1099's and W-2's and supporting Payroll Stubs and Official Time Sheet records going back a FULL seven (7) years
3. Upon Jonathan Allen Coy, Esquire's severe misconduct upon ENTERED PERJURY that exaggerated the income of the Plaintiff-Respondent, Richard William Hoffmann, Sr. by nearly \$100,000.00 to a FALSIFIED \$127,200.00 in PERSONAL INCOME...
 - a. In that ONLY the calculation of FALSE Personal Income tax deductions was considered to FALSELY NET \$6,660.40 per month
 - b. Upon the full (ILLEGAL) EXCLUSION of his domestic remunerations earned from his Disability Retirement income as a Fire Captain/Peace Officer for the people of the State of California at \$2,380.00 per month
 - c. Upon said PERJURY to cause the Court to ORDER \$1,600.00 per month Child Support
 - d. In that the Defendant-Respondent, DeeAnn Rae Johnson demanded CASH paid on the first of every month
 - e. As she THREATENED the Plaintiff-Respondent, Richard William Hoffmann, Sr. WOULD NEVER SEE HIS CHILDREN EVER AGAIN!!!

- f. That upon ZERO (\$0.00) payment to the Ordered Iowa Child Support Recovery
- g. Thus leverage \$63,245.00 in arrearages to the in only 42 months;
- h. That upon NO RESPONSE from the Defendant-Attorney, Jonathan Allan Coy FORFEITED HIS CASE BY DEFAULT upon exhausting his 30-Day deadline to respond:
- i. That the Iowa State Supreme Court, Attorney Disciplinary Board stated nearly 90-days AFTER the petition of Plaintiff-Respondent, Richard William Hoffmann, Sr.
- j. “Due to LACK of evidence the Plaintiff-Respondent, Richard William Hoffmann, Sr.’s case was UNANIMOUSLY DISMISSED!

It is therefore hereby noticed to ALL parties, that upon the fact:

1. The Appellate Court is subordinate to the Supreme Court of Oregon
2. The Commission on Judicial Fitness and Disability is subordinate to the Supreme Court of Oregon
3. The Commission on Judicial Fitness and Disability found the actions of the Honorable Judge Susie L. Norby fully exonerated of her evidenced acts and omissions of acts and the resulting SEVERE misconduct(s) identified above
4. In that, in the same manner the Iowa State Supreme Court is evidenced by SEVERELY INFLUENCED CORRUPT behavior
5. In that, the Plaintiff-Respondent, Richard William Hoffmann, Sr. **CAN ONLY EXPECT** the same **CORRUPT** behavior of the Appellate Court of Oregon to fully DENY and ever consider to ever properly execute and protect his RIGHTS as

FATHER OF HIS CHILDREN, Morgan Elizabeth Johnson-Hoffmann and Noah
Christian Johnson-Hoffmann.... EVER!!!!!!!!!!!!!!

In that, because of such COURT VIOLATIONS, listed and NOT listed, COMMITTED BY
ALL COURTS listed and NOT listed, the Plaintiff-Respondent, Richard William Hoffmann, Sr. IS
EXPERIENCE INCREDIBLE DISCRIMINATION BY ALL THOSE DIRECTLY INVOLVED
AND HEREBY WITHDRAWALS HIS PETITION TO APPEAL SAID CASE ACCORDINGLY:

...in that, upon ALL THE ORIGINAL ENTRIES IN ALL COURTS to evidence:

...in LESS THAN 98 MINUTES from her notice to the Respondent, and therefore in clear
violation of the minimum 72-hour notice to exercise any change(s) whatsoever in child visitation
and/or any arrangements pertaining to and thereof, the Respondent hereby requires this Court to
enter into the official record the following testimony and all attached evidences [**Exhibits 101
through 164 in their entirety**] as legal testimony to REBUKE and DISQUALIFY any and all
allegations that attempt to justify said Modification of Judgment and to instead immediately issue
arrest warrants for the criminal child abduction of Morgan Elizabeth Johnson-Hoffmann and Noah
Christian Johnson-Hoffmann that occurred at approximately 7:35 PM CDT on June 9, 2014, from
the agreed babysitter, Kenneth Stoner of 1212 Southlawn Drive, Des Moines, Iowa 50315.

It is hereby evidenced into the permanent record that the Petitioner, DeeAnn Rae Johnson,
has presented false witness upon her claims within her Declaration commencing on Page 3 of 8 as:

1. Paragraph 2: The petitioner claims Respondent has not seen his children since June
of 2014 and claims Respondent has allegedly attempted to ABDUCT his children.

- a. The enclosed record and all **[Exhibits 101 through 163]** shall be entered into evidence that it is instead the Petitioner who has conspired and executed said children ABDUCTION on June 9, 2014.
2. Petitioner further claims in her attached record that Supervised Visitations **[Exhibit “A”]** have allegedly “*...not gone well.*” in an attempt to coerce this Honorable Court into believing even more false witness as an upon:
 - a. Petitioner did NOT enter any dialog from any visits AFTER September 28, 2018.
 - b. See attached Email from Respondent to Ann Dickerson dated November 11, 2018 **[Exhibit 163]** as his response to the evidenced delusional allegations asserted by Ms. Dickerson upon repeated severe misinterpretation(s) of fact(s) in which the Marion County Court Ordered the immediate CEASE and DESIST of the need of her direct supervision of all future visitations with the exception of December 8, 2018; but then only to allow Ms. Dickerson the opportunity to inform the children she would no longer be in attendance.
 - c. In that visitations SHALL not be arbitrarily discontinued but occur on a regular basis. **[Exhibit #159]**
 - d. Item “c” above has been repeatedly violated by Petitioner as she has continued to DENY any and all visitations since December 8, 2019.
 - e. Ms. Dickerson is GUILTY of committing the ILLEGAL (non-informed and non-approved) audio recording of all parties present without their knowledge nor consent on September 28, 2018, as evidenced upon her impeccable dialog of the entire visitation/conversation. **[Exhibit A]**

3. On page 4 of 8, Paragraph 2a: The petitioner claims Respondent has never had custody.
- a. This is perjury as Petitioner and Respondent both share JOINT CUSTODY per THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY, Case No.: DRCV37370, Order Modifying Decree entered May 18, 2011, on Page 2, paragraph 1 - **[Exhibit 110]**
 - b. The petitioner further claims, ***“I do not want to give Richard (Respondent) to opportunity to actually abduct them.”***
 - i. This claim is delusional perjury as Petitioner is evidenced guilty of abducting both children per the entered Exhibits evidenced herein first upon the AGREED Parenting Schedule created by Petitioner sent via email to Respondent dated May 28, 2014, at 11:22 AM for all activities from **“Friday, May 30, 2014; Noah 5:40 field 5” thru Wednesday, July 9, 2014**, directing Respondent to take her older son Ty to a mental health appointment in West Des Moines at 2:30 PM accordingly. **[Exhibit 116]**
 - ii. In which Case No. DRCV37370, Order Modifying Decree entered May 18, 2011, on Page 4, paragraph “j” clearly states that any changes shall not be in less than, ***“...72 hours if NOT agreed.”*** **[Exhibit 110];**
 - iii. The text dialog from Petitioner to the mutually agreed babysitter, Kenneth Stoner, demanding he cooperate with the removal of both minor children from his home upon her allegations, ***“Kenny I had 3 calls from softball parents last night that are very concerned for***

Morgan an Noah. Will you please let my friend [evidenced as Debra Eastwood (and Anika Blum)] have the kids – she will put them on a plane & I will meet them in Denver. Please! They aren't ok with rich.” on June 9, 2014, at 10:12 AM CDT [**Exhibit 119**]

- iv. Text dialog (in writing) from Petitioner to Respondent received upon his arrival in Las Vegas NV, while on business at the annual National Fire Protection Association convention informing him of her desire to CHANGE child-care/visitation plans/arrangements. Received Monday, June 9, 2014, at 2:24 PM PDT [**Exhibit 118**]
- c. SWORN AFFIDAVIT of Kenneth Stoner that describes all details of WITNESSED CHILD ABDUCTION signed and dated under penalty of perjury on August 16, 2014, and entered in the Iowa Court [**Exhibit 120**]
- d. Photo evidence of Respondent with children upon exiting the TSA Gate at Portland International Airport on June 10, 2014, at 7:06 PM. Respondent secured an emergency airline ticket to fly from Las Vegas to Portland to arrive five (5) hours prior to Petitioner with the minor children. Respondent, therefore, canceled all business plans (that Petitioner was fully aware of all details in order to conspire and effectively execute said CHILD ABDUCTION) in order to be with his children and electronically enter all necessary Court documents in the Iowa Court in an attempt to direct law enforcement to attempt to rescue his children. [**Exhibit 121**]
- e. Respondent later texted Anika L. Blum to ‘inspire’ her to contact Ankeny Police Department upon alleged HARASSMENT BY COMMUNICATION in report #14-002671 on June 19, 2014, but only to entice her to ADMIT to a

sworn peace officer, *“Anika said she recently picked up her sister’s children, took them to the airport, and had them fly to Oregon to be with their mother.”* **[EMPHASIS ADDED!]** [Exhibit 122]

- i. When contacted by Ankeny Police Department, Respondent reassured said officer he was only interested declared under penalty of perjury her direct involvement in the evidenced CHILD ABDUCTION, IMPRISONMENT, and TRANSPORTATION OVER STATE LINES OF MINOR CHILDREN. Respondent then promised to never contact her again and thanked him graciously for his assistance to evidence TRUTH in this matter before wishing him and his fellow peace officers a SAFE shift.
4. Paragraph 3: **Relocation** - The petitioner claims she should be allowed to move more than 60 miles away, if necessary, alleging *“For Morgan’s and Noah’s SAFETY.”* claiming both are afraid of Respondent. This feeling of FEAR is only upon years of brainwashing Respondent is a terrorist threat to their safety. **[Exhibit #105]**
5. See photos of children and Respondent during the first week together **[Exhibit #117]** in which Morgan stated to Respondent on June 7, 2014, *“I love living with you so much Daddy... I don’t care if I don’t see Mommy for a year!”* [an ETERNITY!]
 - a. Yet now refuses all literally any and all contact with Respondent as a direct result of severe **SUCCESSFUL PARENTAL ALIENATION** as evidenced and declared by and upon the observations of the Honorable Judge Tripp of the Marion County Court, Case No. 14C320321 on September 11, 2019. **[Exhibit #105]**

6. Paragraph 4: **Contact Information** – Petitioner falsely claims Respondent: “*Richard cannot stay within boundaries set forth.*”
 - a. Respondent requires this court to cause Petitioner to produce any and all evidence of any source in which she claims she possesses that he has ever been a threat to her, let alone his children ever to claim such allegations.
7. See In the District Court of Iowa in and for Polk County; Case No. DA 19322 **ORDER DISMISSING CHAPTER 236 PETITION – Denied** (Restraining Order) on February 28, 2012, due to “No Statutory Basis for Order” upon Petitioner’s complaint regarding the current Decree that requires the receiving parent to provide transportation in the exchange of children upon visitation. **[Exhibit #111]**
 - a. Father’s Day, June 13, 2014, “selfie” photo with both children in the back seat of Chris Garner’s (fiancé of Petitioner) vehicle who provided transportation to Dairy Queen in Silverton. **[Exhibit #128]**
 - b. Video of Noah’s testimony as a victim of his child abduction over state lines while at Dairy Queen on Father’s Day, June 15, 2014. **[Exhibit #129]**
 - c. The last moment Respondent saw his children, as Noah **spontaneously** ran across the street from his new home to hug Respondent upon arriving at Child Care at Grant School at 725 Market Street NE, Salem, OR 97301 **[Exhibit #131]**
 - d. Video evidence of Respondent’s attempt to legally add his name (upon JOINT CUSTODY) to the parental contact list upon providing his driver’s license as proper I.D. before **peacefully [EMPHASIS ADDED!!!]** exiting the Child Care facility as evidenced. **[Exhibit #132]**

- e. Video evidence of the result of the Petitioner then presenting false witness to cause all staff to consider Respondent as extremely dangerous – 911 was called to summons law enforcement. **[Exhibit #133]**
 - f. Salem Police report #SMP14022717, dated June 16, 2014, in which Petitioner committed many counts of perjury to law enforcement officers including her false witness the children flew with her to move from Iowa to Oregon weeks earlier;
 - g. ...and declared Respondent as an extreme safety and security risk to all children causing this facility to hire private security over the summer months at great expense in an attempt to justify her false concern to those unaware of TRUTH. **[Exhibit 134]**
8. That upon Respondent filing his “**PETITION OF MODIFICATION OF CUSTODY, CHILD SUPPORT, AND CHILD VISITATION RIGHTS AND WRIT OF ASSISTANCE**” In the District Court of Iowa in and for Polk County; Case No. DRCV37370 upon the evidenced child abduction, imprisonment, and transportation of minor children over state lines, **[Exhibit #126]** Respondent then forwarded the same to Petitioner via email in that...
- a. Petitioner email replied to Respondent on June 16, 2014, at 4:34 PM:
“Bottom line I have primary care of Morgan and Noah. I’m filing a restraining order. You might get to see Morgan and Noah a year from now.” **[Exhibit #127]**
 - b. Audio testimony from Petitioner in the Marion County Court on September 11, 2018, in that she declared under penalty of perjury that the ONLY reason she prevented Respondent access to the children (upon the only method was

entered PERJURY to substantiate a falsely established Restraining Order) because Respondent filed his **Modification of Custody** above. [Exhibit #105]

- c. The Petitioner then filed **PETITION FOR RESTRAINING ORDER TO PREVENT ABUSE** in the Marion County Circuit Court for the State of Oregon for the Third Judicial District; Case No. 14C31598; FILED on June 20, 2014 [Exhibit #135]
- i. That includes countless perjuries starting on page 7 of 31, Paragraph 3 stating allegations in Marion County, Oregon, she alleged she had evidence on June 19, 2014, that Respondent: *“Threaten to KILL me and abduct my children. Threatened to KILL both of my sister’s children.”* [Emphasis added!!!]
 - ii. Allegations she claims evidence on June 18, 2014, in Marion County, Oregon that Respondent: *“Threaten to KILL me and abduct my children. Threatened to KILL both of my sister’s children.”* [Emphasis added!!!]
 - iii. Allegations she claims evidence on June 16, 2014, in Marion County, Oregon Respondent: *“Threaten to KILL me and abduct my children. Threatened to KILL both of my sister’s children.”* [Emphasis added!!!]
 - iv. Page 8 of 31, Paragraph 4, Petitioner alleged Respondent in Polk County Iowa [NO date]; *“...threatening my LIFE if don’t do as he says.”*

v. Page 8 of 31, Paragraph 4, Petitioner alleged Respondent in Polk County Iowa [NO date]; *“Pushing me down and holding me against my will while I was PREGNANT”* [Emphasis added!!!]

1. Why was this NOT entered as evidence to PREVENT the **ORDER DISMISSING CHAPTER 236 PETITION**; Case No. DA 19322 on February 28, 2012, a full two (2) years earlier!?! Because she had not yet learned to realize the **POWER OF PERJURY!** [Exhibit #111]

vi. Page 8 of 31, Paragraph 4, Petitioner alleged Respondent in Polk County Iowa [on June 16, 2014!?!]; *“Hold my arms so tight he left BRUISES, [Emphasis added!!!] threatening me with physical (emotions?), mental anguish if I didn’t comply to his demands.”*

1. Respondent requires the court to require the Petitioner to enter **photographic evidence of said alleged BRUISES!**

vii. Page 8 of 31, Paragraph 5, Petitioner alleged Respondent: *“He has threatened to ABDUCT my children. [Emphasis added!!!]*

viii. Page 8 of 31, Paragraph 7, Petitioner alleged Respondent threatens: *“My Safety and the safety of my children.”* [Emphasis added!!!]

ix. Page 10 of 31, Paragraph 15, Petitioner alleged Respondent: *“...threatening to ABDUCT Morgan and Noah.”* [Emphasis added!!!]

x. The Respondent then therefore hereby **requires** this honorable Court to uphold and enforce the law to the fullest extent to prosecute EVERY PERJURY regarding Page 11 of 31, in that above Signature

of Petitioner, clearly states: “...*statements... ...are subject to*
PENALTY OF PERJURY.” [Emphasis added!!!]

- xi. The audio recording of Petitioner’s 7:43 minute verbal testimony on July 3, 2014 hearing, Case No. 14C31598 [Exhibit #138] in which Petitioner not only repeated these many evidenced perjuries listed above...
- xii. ...but **WITNESS TAMPERED** her future sister-in-law, Cheryl Weatherly, to testify and cause further increased FALSE ALARM that the children were allegedly suffering severe mental anguish, and only upon Petitioner’s continuous assertions, emphasized abuse can only be allegedly committed by Respondent. [Exhibit #138]
- xiii. IN that they both were suffering severe mental anguish upon the fact they experienced a horrific child abduction upon being violently removed from their place of residence over state lines and were not able to simply be with their Daddy, the Respondent.
- xiv. **Respondent therefore hereby requires this Court to act in its full legal and lawful authority and capacity, that upon each judicial officer thereof has accepted their Constitutional Oath to maintain the positions they now hold; and in doing so, SHALL uphold ALL laws of our United States Constitution without loss or relinquishment of any my or my children’s rights secured thereof whatsoever.**

9. The audio testimony of Petitioner in the Marion County Court testified on December 4, 2018, that she FEELS she had every right to remove the children from Iowa, and upon same, she FEELS: **[Exhibit 104]**
- a. She violated no court documents from Iowa;
 - b. That all her entries shall be considered as truths upon her assertion, “*None of it is false.*”
 - c. ...in that there was, therefore, nothing to prevent her from removing the children from Iowa to Oregon;
 - d. ...and asserts she never claimed Respondent as a terrorist threat to anyone;
 - e. ...but it was, in fact, other resources that make such claims to insist the current restraining order that she demands shall remain in place indefinitely.
10. The audio testimony of Petitioner claiming she never kidnapped the children, removed them from our mutually agreed babysitter, Kenneth Stoner, by surprise, and therefore had every right to remove the children from Iowa to Oregon. **[Exhibit #115]**
11. That upon the evidence Petitioner had in fact illegally removed both children from the State of Iowa, that the children were then NOT allowed leave the State of Oregon under any circumstance whatsoever effective September 11, 2018. In that when Morgan was invited to a wedding in Vancouver, WA, on September 15, 2018, an event that she had looked forward to for months. The Petitioner then contacted the visitation supervisor, Ann Dickerson, in that upon only 21-hours-notice at 5:00 PM September 14, 2018, arranged an EMERGENCY visitation session between 2:00 PM and 3:00 PM the very day of two (2) events both children were then forced to miss; in that the Respondent had no knowledge of any canceled plans or arrangements that

were affected by the 'in-State' restriction; in that the Petitioner purposely scheduled said this last-minute EMERGENCY visitation to cause both children to then place full responsibility onto the Respondent for what appeared to "PURPOSELY" prevent their respective attendance at each said event. Evidence Petitioner's commitment to further PARENTAL ALIENATE the children from Respondent was executed impeccably. See email from Respondent to Ann Dickerson dated November 11, 2018 [**Exhibit 163**]

It shall, therefore, be further evidenced, upon the conspiracy to commit same, that the Petitioner, DeeAnn Rae Johnson, orchestrated, including but not limited to, the conduct of Anika L. Blum and Doug M. Blum of 413 Wintergreen Street NW, Ankeny, Iowa 50023; and Deborah L. Eastwood of 4232 65th Street, Urbandale, Iowa 50322 accordingly. ALL entries and ALL exhibits that refer to the above referenced and evidenced acts of CHILD ABDUCTION, CHILD IMPRISONMENT, TRANSPORTATION OF MINOR CHILD OVER STATE LINES shall be heard in their entirety for all those involved as DEFENDANTS as the accused of the crime of CHILD KIDNAPPING, in violation of Iowa Code Sections 710.1, *et seq.*, 710.4, 710.5 (Child Stealing) [two counts], and 710.6 (violation of a known State of Iowa Court Order); as well as Child Endangerment 726.6(1)(a), 726()(d), 726.6(1)(f), and 726.6(7) of the Iowa Code.

All upon the overt violation of your Respondent's substantive natural born, common law and constitutional rights in this matter; as that all DEFENDANTS on June 9, 2014, did in fact commit the acts and/or omissions against Respondent, Richard William Hoffmann, Sr., and his unemancipated and incompetent minor children: "Morgan Elizabeth Rae Johnson-Hoffmann" and "Noah Christian Johnson-Hoffmann," who are the favored daughter and son of the State of Iowa.

NOTICE: That on a date certain of June 9, 2014, and at a time certain of approximately 7:35 PM CDT and at a place certain of the residence of KENNETH STONER (The Babysitter), located at 1212 Southlawn Drive, Des Moines, Iowa, that one DEFENDANT ANIKA L. BLUM at the assistance of DEFENDANT DEBORAH L. EASTWOOD at the direction of DEFENDANT, DEEANN RAE JOHNSON, illegally kidnapped, carried away, and inveighed my minor children Morgan Elizabeth Rae Johnson-Hoffmann and Noah Christian Johnson-Hoffmann IN OVERT AND WILLFUL VIOLATION OF A KNOWN COURT ORDER ISSUING FROM THE IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY, and in open and willful VIOLATIONS of Respondent, Richard William Hoffmann Sr. lawful authority, and in direct violation of his commands and over his continued objections.

This crime was done with collusion of several other DEFENDANTS, who carried away and willfully concealed the children, including DEFENDANT DOUG M. BLUM, and did not inform/obstructed any contact whatsoever by me, the Respondent of this matter of either the purpose or reason of the CHILD KIDNAPPING; of which aforesaid DEFENDANTS, in open, intentional, premeditated and willful collusions, violated your Respondent, Richard William Hoffmann Sr. natural-born, common law and constitutional rights in this matter, and made aforesaid named DEFENDANTS **a law unto themselves**, in violation to both my secured rights, as well as my children's' rights, and in open violation of a KNOWN COURT ORDER.

Your Respondent, the greatly damaged and aggrieved party in this matter, incorporates by reference of the soon to be entered completed POLICE REPORT, in its entirety, along with its ancillary documents: its concomitant AFFIDAVIT OF TRUTH BY COMPLAINANT; DECLARATION OF PROBABLE CAUSE; BODY OF ATTACHMENT AND WARRANT FOR ARREST AGAINST DEFENDANTS: DEEANN RAE JOHNSON, Et Al., including DEBORAH L. EASTWOOD; ANIKA LEE BLUM, and DOUG M. BLUM. Your Respondent Richard William

Hoffmann Sr. also incorporates by reference, the *supporting* DECLARATION OF TRUTH OF KENNETH STONER [**Exhibit 120**].

Your Respondent also incorporates by reference and gives NOTICE OF RELATED CASES: within in THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY, Case No.: DRCV37370; as well as the CIRCUIT COURT OF THE STATE OF OREGON, FOR THE THIRD JUDICIAL DISTRICT, Case No.: 14C31598 and Case No.: 14C320321 **and** the CIRCUIT COURT OF THE STATE OF OREGON, COUNTY OF CLACKAMAS Case No. 19DR03090.

Please judicially note and place on the record that within the aforesaid CIRCUIT COURT OF THE STATE OF OREGON, FOR THE THIRD JUDICIAL DISTRICT, Case No.: 14C31598 and Case No.: 14C320321 **and** the CIRCUIT COURT OF THE STATE OF OREGON, COUNTY OF CLACKAMAS Case No. Case No. 19DR03090, that Petitioner, Deeann Rae Johnson entered in that Court and placed overtly and with fraudulent and willful PERJURY after-the-fact, after committing her crime of ILLEGALLY KIDNAPPING the children from their home, within the STATE OF IOWA, and sending them without PLAINTIFF'S KNOWLEDGE, and over and above his continued objections and against his authority, sent them to the STATE OF OREGON, and with UNCLEAN HANDS, then knowingly entered PERJURED TESTIMONY (falsely giving illegal names of each unemancipated child from Morgan Elizabeth Rae Johnson-Hoffmann, to MORGAN ELIZABETH JOHNSON, from Noah Christian Johnson-Hoffmann to NOAH CHRISTIAN JOHNSON, and entering them before the OREGON Court, so that Court could unlawfully attempt to gain illegal jurisdiction from Petitioner Deeann Rae Johnson's crimes to illegally attempt to transfer CUSTODY into her possession, in direct violation of law. [**See: EXHIBIT 136a**] (Morgan Elizabeth Rae Johnson-**Hoffmann**) and **EXHIBIT 136b** (Noah Christian Johnson-**Hoffmann**)] BIRTH CERTIFICATES (attached).

FACT: That the aforesaid CIRCUIT COURT OF THE STATE OF OREGON, FOR THE THIRD JUDICIAL DISTRICT, case no.: 14C31598 and 14C320321 **and** the CIRCUIT COURT OF THE STATE OF OREGON, COUNTY OF CLACKAMAS Case No. 19DR03090 are factual without *in personam*, nor SUSPECT-matter jurisdiction, and any findings, recommendations, or Court orders, issuing from that Court; are in fact, NULL and VOID, upon the crimes and willful PERJURIES of all aforementioned DEFENDANTS and their surrogate Courts. Aforesaid findings, recommendations or Court orders of the Oregon Court are in fact, not just VOIDABLE, but VOID JUDGMENTS at law.

It is a FACT: that this above-entitled THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY, is in fact, **the proper, and controlling venue and jurisdiction of this matter, as the crimes occurred within the County of Polk and City of Des Moines and City of West Des Moines, State of Iowa, concerning each child and their Father, who are State Citizens of the State of Iowa and no other.**

THEREFORE, for good and substantive cause shown, Complainant requests (upon change of purpose of said Hearing) entry of verification of VOID JUDGEMENTS and require DEFENDANTS' be SUSPECT to ARREST and BAIL CONDITIONS of release where applicable,

(1) That the ARREST WARRANT for DEFENDANT, Deeann Rae Johnson, [Let this record state evidence that the IOWA ARREST WARRANT appeared "Recalled" WITHOUT proper PROCESS and NOTICE] be REINSTATED WITHOUT DELAY for the immediate ARREST within the State of Iowa and/or the State of Oregon with the NO-BAIL WARRANT, and/or that other lawful steps be taken to obtain Petitioner's appearances by way of extradition before the above-entitled Court by any means or conveyance; and,

(2) That immediately and UNCONDITIONALLY that the State of Iowa, compel any other harboring state, (most probably the State of Oregon) to formally, and immediately RETURN the state Citizens of the State of Iowa, the unemancipated children Morgan Elizabeth Rae Johnson-Hoffmann and Noah Christian Johnson-Hoffmann belonging to their Father Richard William Hoffmann Sr., **to be immediately RECOUPED and immediately RETURNED back to their father in the State of Oregon, which is now the aforesaid children's home State and where they reside;** and,

(3) That each DEFENDANT in this matter be lawfully arrested and detained, upon the issue/reinstatement of ARREST WARRANT(S) and which will be supported by the entry of PROBABLE CAUSE against each co-Conspirator and DEFENDANT upon the supporting Declarations thereof, if already in custody, pending further CRIMINAL PROCEEDINGS of this matter, and that aforesaid SUSPECTS' otherwise be properly dealt with in accordance with the concise rule of law.

(4) That this Court gives your Respondent Richard William Hoffmann Sr. any other further remedy and/or relief that this Court deems fair, necessary and/or just.

Your Respondent Richard William Hoffmann Sr. wants it judicially noted and on the record, that each Defendant not only violated the known STATE OF IOWA but also FEDERAL LAWS, to wit:

(1) Uniform Child-Custody Jurisdiction and Enforcement Act (1997), 9(1A) U.L.A. 657 (1999). The text is accessible online at www.nccusl.org.

(2) Uniform Child Custody Jurisdiction Act, 9(1A) U.L.A. 271 (1999).

(3) Parental Kidnapping Prevention Act of 1980, 28 U.S.C. § 1738A.

(4) ASDF

(5) SADF

(6) Reference: The Hague Convention can be found at 51 Fed. Reg. 10,494 *et seq.* (1986) or online via the U.S. Department of State's Web site at www.travel.state.gov, under "International Parental Child Abduction."

a.) International Child Abduction Remedies Act, 42 U.S.C. § 11601 *et seq.*

b.) As to OREGON'S ability to obey this state's law, and Plaintiff's fundamental rights, see the Uniform Child Custody Jurisdiction Act, Prefatory Note. The Full Faith and Credit clause requires that full faith and credit "be given in each state to the public acts, records, and judicial proceedings of every other state" (U.S. Constitution,

c.) Please also judicially note and place it on the record: 28 U.S.C. § 1738A, "Full Faith and Credit Given to Child Custody Determinations."

(7) 28 U.S.C. § 1738A(d). This section establishes the principle of "exclusive, continuing jurisdiction. (*i.e.* The State of Oregon cannot assume jurisdiction as original jurisdiction of the case, as well as the venue and jurisdiction of the crime, is controlling throughout the State of Iowa).

That for good cause shown, that the PETITIONER, who had been NON-COMPLIANT with a known Court order, must invoke this Courts CRIMINAL JURISDICTION upon the CLAIMS made upon this CRIMINAL COMPLAINT and verification of VOID JUDGEMENTS in other Court(s) to justify the retention and maintenance of these Court proceedings within the "In Rem" jurisdiction of IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY.

AFFIDAVIT

STATE OF OREGON

COUNTY OF CLACKAMAS

} *Affirmed*

I, the undersigned, being duly sworn, state that following facts known to me as I have first-hand personal knowledge of the facts, evidence and events form the basis for my belief that the referenced DEFENDANTS/SUSPECTS' committed these crimes:

That on a date certain of June 9, 2014, and at a time certain of approximately 7:35 PM CDT and at a place certain of the residence of KENNETH STONER (The Babysitter), located at 1212 Southlawn Drive, Des Moines, Iowa, that one Defendant ANIKA LEAH BLUM at the assistance of one Defendant DEBORAH L. EASTWOOD at the direction of Defendant DEEANN RAE JOHNSON, illegally kidnapped, carried away, and inveighed my minor children Morgan Elizabeth Rae Johnson-Hoffmann and Noah Christian Johnson-Hoffmann IN OVERT AND WILLFUL VIOLATION OF A KNOWN COURT ORDER ISSUING FROM THE IN THE IOWA DISTRICT COURT IN AND FOR POLK COUNTY, and in open and willful VIOLATIONS of Plaintiff Richard William Hoffmann Sr. lawful authority, and in direct violation of his commands and over his continued objections. This crime was done with collusion of several other DEFENDANTS, who carried away and willfully concealed the children, and did not inform me, the Plaintiff of this matter of either the purpose or reason of the CHILD KIDNAPPING; of which aforesaid Defendants' in open, intentional, premeditated and willful collusions, violated your Plaintiff Richard William Hoffmann Sr. natural-born, common law and constitutional rights in this matter, and made aforesaid named DEFENDANTS' a law unto themselves, in violation to both my secured rights, as well as my children's' rights, and in open violation of a KNOWN COURT ORDER.

That Defendant DEEANN RAE JOHNSON had aid and assistance from these other known Defendants:

- (1) DEEANN RAE JOHNSON; 4121 Norfolk Street, West Linn, OR 97068
Tel. 515-664-5959
- (2) DEBORAH L. EASTWOOD; 4232 65th St., Urbandale, IA 50322
Tel. 309-269-3089
- (3) ANIKA LEE BLUM; located at 413 NW Wintergreen St., Ankeny, IA 50023
Tel. 515-371-4055
- (4) DOUG M. BLUM; located at: (same as above)
Tel. 309-269-3089/515-963-8568

Dated: December 27, 2019

Richard William Hoffmann
123 SW Oregon Train Drive
Dallas, OR 97338

VERIFICATION

County of Clackamas

}

.SS

State of Oregon

I, Richard William Hoffmann Sr., being undersigned, declare under penalty of perjury as follows:

That the afore-going Document(s), Affidavit(s), Declaration(s), and/or Materials, Id., including referenced and/or attached documents, and/or duplicates of such documents are exacting copies of the originals in my/or my counsel's (specifically not American Bar Association, or professional "Attorney's") possession. That I have read the foregoing document(s) and attachments, and know and understand their contents, and having personal knowledge, know them to be true. As to those matters submitted therein upon information and/or belief, as to those matters, I also believe them true.

Executed this 27th day of December in the Year of Our Lord and Savior, Jesus the Christ, year Two-Thousand-Nineteen.

DATED: December 27, 2019

Richard William Hoffmann
123 SW Oregon Trail Drive
Dallas, OR 97338
Tel. 775-455-7341

SUBSCRIPTION

Subscribed this 27th day of December under exigent circumstances, before Almighty God, in the Year of Our Lord and Savior, Jesus the Christ, year Two-Thousand-Nineteen.

DATED: December 27, 2019

SEAL:

Richard William Hoffmann, At Law
Reserving All Rights, Giving Up None