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2024 OHIO YOUTH IN GOVERNMENT  
YOUTH GOVERNOR LETTER



Good morning, everyone and welcome to the 2024 Ohio Youth In Government! I am thrilled that everyone could join us for this amazing three-day event. I hope you are all as excited as I am for the progress we will make here. Over the past three years, I have had the absolute pleasure of attending Youth In Government along with other events like Camp Horseshoe, Youth Opportunity Camp, and Fall Con. Through these events, I have met some of the most wonderful people that I am so fortunate to call my lifelong friends. When you join this program, you are not just joining an organization, you are becoming part of a family. I am grateful to be a part of this family, and I am thrilled that you all are too.

I understand that some of you may be nervous about presenting your bills in your committees or even in the House or Senate, but don't worry! We are all here to learn and grow together. By the end of this event, you will have a deeper understanding of how our government works and how you can effect positive change. Youth In Government has taught me so much that I will carry with me forever. I would like to express my gratitude to all of you, the advisors, David King, and anyone who has helped or been a part of this organization. Thank you.

During this year Youth In Government, I hope all of you not only have a good time but leave feeling that you learned something. I hope you all have an amazing time and remember to respect everyone's opinions and just have fun!

Respectfully,

*Maggie Gilmore*

Maggie Gilmore

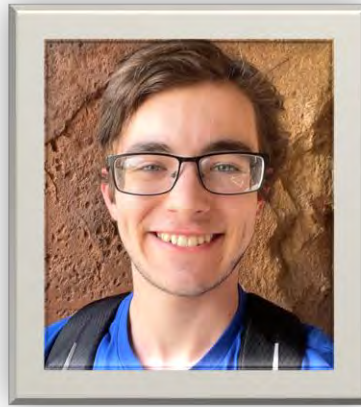
2024 Ohio Youth Governor



# *Your 2024 Youth in Government Officers*



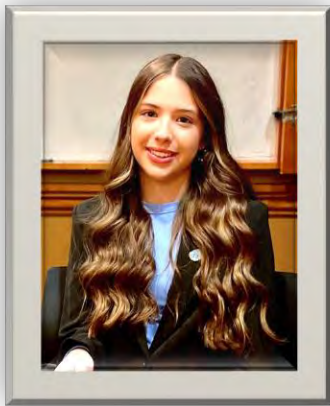
**Maggie Gilmore**  
**Youth Governor**  
**Washington Courthouse**



**Liam Milliken**  
**Lt. Governor**  
**Jackson**



**CeCe Stamper**  
**Youth Chief Justice**  
**Western**



**Haley Ross**  
**Secretary of Tourism**  
**Jackson**



**Allison Causey**  
**Secretary of Health &  
Human Resources**  
**Jackson**



**Abby Plants**  
**Secretary of Finance**  
**Jackson**



**Sophie Rhoades**  
**Secretary of Education**  
**Western**



**Liliana Printz**  
**President of the Senate**  
**Calvary Christian**



**Luke Jolly**  
**Speaker of the House**  
**Jackson**



**Kydin Whitmore**  
**House Clerk**  
**Western**



**Braelyn Brennan**  
**Associate Justice**  
**Jackson**

Photos not available at time of printing.

**Kollier Fulton**  
**Associate Justice**  
**Jackson**

**Tessa Risner**  
**Associate Justice**  
**Western**



## Welcome to the 73rd Ohio Youth in Government!

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Ohio-West Virginia  
Youth Leadership Association

We're Ohio's original Youth in Government! C. William O'Neill was Ohio's Attorney General when he and Oliver Ocasek met around the coffee table in Bill Eells' home in Delaware to begin planning our first YG. They quickly involved other state leaders, teens, and our staff. Their work convened our first OYG in 1952 at the Statehouse. The founding principles they built into OYG remain our foundation today – integrity, volunteer service, responsibility, and citizenship.

Ohio YLA Youth in Government is distinctly different. We're about citizenship, not politics, political careers, talk, or debate. OYG seeks solutions for the common good as we lift others up to become their very best, work to change conditions so all succeed, and to make our make our schools, communities and state better than we found them.

In these three days in the Statehouse, experience the process of state government, make decisions to move Ohio forward, create connections with peers and adults from across our state, and have a great time with a purpose. Make friends, learn all you can, put your best ideas forward, and make differences for good now and throughout your life.

YLA began as a State YMCA in 1867. Today we're an association open to all. New doors of opportunity are opening for more youth to benefit in all YLA programs. YLA youth will make even greater contributions to improving our communities, states, and nation.

*Now – enjoy, learn, help others, and make lasting differences  
for good!*

### Check in Hotel, Statehouse Meeting Rooms

Check In                      12:00 noon to 1:00 p.m.      The Plaza Hotel Columbus at Capitol Square

Delegation Leaders only register delegations at the YLA Youth in Government table in The Plaza Hotel lobby, not the hotel front desk.

YLA Youth in Government staff provide hotel keys to the Delegation Leader. Hotel rooms may not be available until the hotel's normal 3:00 p.m. check-in time. *Please have your delegation members dressed for the program when you arrive at the hotel. There will be rooms to store luggage until hotel rooms are available.*

Parking

Delegations are responsible for their own parking fees. There are downtown parking lots and garages. The Statehouse underground garage is also available.

Statehouse

Review with your total student and adult delegation the Use and Care of the Statehouse explained later in this book.

Responsibility

Responsibilities of students and adults are more completely explained in the YG Manual and this Bill Book. Briefly -

- Every student and adult through the act of registering to attend Youth in Government has agreed to support the Code of Conduct.
- Local delegations select their own participants and are responsible for their conduct at all times.
- One adult supervisor is to accompany every ten youth members of a delegation. Adults are to be 21 years of age or older, registered participants with the YG program, and must stay at the hotel with their delegations. The adult delegation leader is responsible for the conduct, supervision, and control of all youth and adult members of their delegation. Adults also have assignments to help with the YG program.
- Delegation leaders and advisors prepare their students in advance of YG. Adults do not influence legislation or judicial decisions. Adults encourage their students to meet students from other delegations and to interact with other students throughout the weekend.

Statehouse Committee Rooms

YG Office	Members Lounge (Senate) – near the Senate Chamber
Bill Coordinators	Members Lounge (Senate) – near the Senate Chamber
Senate Committee 1 *****	Senate Hearing Room 126 – Finance Hearing Room
Senate Committee 2	Senate Hearing Room 231 South – 2 <sup>nd</sup> Floor
House Committee 1	House 116 – Benjamin Harrison -1 <sup>st</sup> Floor State St. side
House Committee 2	House 121 – William McKinley – 1 <sup>st</sup> Floor
House Committee 3	House 114 – Rutherford B. Hayes – 1 <sup>st</sup> Floor
Lobbyist	House 113 – William Henry Harrison – 1 <sup>st</sup> Floor
Page	House 113 – William Henry Harrison – 1 <sup>st</sup> Floor
Press	House 122 – William Howard Taft – 1 <sup>st</sup> Floor
Youth Governor & Cabinet	Senate Room 110 U.S. Grant 1 <sup>st</sup> Floor
Judicial	Senate Hearing Room 217 North – 2 <sup>nd</sup> Floor

Judicial Deliberation Room Senate Room 139 - 1st Floor

\*\*\*\*\*Senate Finance Room 126 will NOT be available Friday until 1:00 p.m. Until that time, Senate Committee 1 will meet in the Senate Chamber. That is Friday from 9:00 a.m. until 1 p.m. only.



### Dress

Youth in Government is a model of government in action. Included is the way we act, speak, conduct ourselves, and the way we dress. Youth in Government sessions require professional business attire.

Men wear coats and ties during the program sessions. No sport shirts or blue jeans. Women wear professional business attire. No spaghetti straps or exposed midriff allowed. Women may wear nice pants outfits.

Casual dress including blue jeans is appropriate at recreation and the hotel.

### Meals

Two breakfasts are provided. All other meals are "on your own."

### Housing

Everyone is required to stay at the Youth in Government hotel. Two nights' lodging are included in your program fee. Additional information is available in the Participation Agreement. Please note that if a group does not have enough students to fill up a room, expect your student(s) to be housed with students from another delegation or you may "buy out" rooms for your students. Contact the YLA office for costs to buy out one or more rooms.

### Parking

Parking is at your expense. Parking is available at your cost at the hotel or in nearby parking lots.

### Cancellations and Refund Policy

The best laid plans can go awry. However, since all our program fees are set below our actual costs, we have no flexibility to provide refunds. Therefore, our policy is NOT to provide refunds for the Participation Agreement or the Final Fee. Actually, the person cancelling should reimburse the program for the costs the program has incurred on their behalf by paying the scholarship received back to the program. The program does permit delegations to send a replacement.

1. Delegations who want to provide refunds need to set aside money to provide refunds to their students.
2. Delegations don't refer parents to the YLA Office with billing/refund questions. Handle these locally.
3. After a delegation is registered, it is responsible for the entire payment for that number of student/adult delegates.
4. Remember, no refunds from the Youth Leadership Association so do not ask nor have others call to ask.

### Code of Conduct: YLA Family of Programs

Participants – youth and adults - in YLA programs demonstrate responsibility and the highest levels of personal and group character. Due to that, few rules are required.

In general, our rules are summarized in these three (3) points:

1. Treat others as one wants to be treated.
2. Do not fail to do something that would help others, make the place we are using cleaner, safer, and a better experience for all.
3. Do not do anything that hurts or could potentially harm another person, place, or thing.

Some specifics may be helpful –

1. Attend all sessions of the program;
2. Wear name badges as called for by the program;
3. Names of anyone absent from a session are referred to the program director and the appropriate advisor;
4. Adult sponsors and chaperones are responsible for the supervision of their Delegation;
5. ABSOLUTELY NO FOOD, DRINK, or GUM are permitted in the House, Senate, Committee rooms, Supreme Court, or other government facilities used at YG;
6. Not permitted at YLA programs are tobacco, alcoholic beverages, illegal drugs, or weapons;
7. There is no coed visiting in housing rooms;
8. All delegates are in their own room, observe quiet hours at the time indicated by the curfew and will not leave their room until the end of curfew;
9. Room changes are not made unless made by YLA staff;
10. Participants do not invite or receive visitors unless approved by the Advisor and YLA staff. Visitors, alumni, etc. are not permitted in the lodging facility guest sleeping rooms at any time. Guests are restricted to lobbies and visitor areas.

### Use & Care of the Statehouse/Capitol

Use of the Statehouse/Capitol requires the highest level of care and respect for the facility, its furnishings, equipment and its traditions. Each student participant and adult is to exercise the highest level of individual responsibility for the Statehouse/Capitol and to hold everyone else to that same level of responsibility.

No chewing gum in the Statehouse/Capitol.

No food, snacks, candy or drinks (including water bottles) in any Statehouse/Capitol room.

The desks, chairs and other furniture in the Senate and House are easily scratched or marred. Use deliberate caution in placing items on the desk or lifting things off. Do not slide anything as they easily can scratch the finish. Do not "toss" books, purses, brief cases or anything on a desk as that can easily damage the finish of the desk. Staples are a problem too. Do not put a stapler on a desktop. *Do not write on any single sheet of paper on a desk as the pencil/pen can leave an impression on the desk finish.*

Do not sit or lean on any desktop or desk.

Check the desk, chair, tables, and rooms one is using. Report any damage observed to the Advisor in that room and/or YG Staff. Advisors pass on damage reports in writing to YG Staff.

Extend to all members of the Senate and House of Representatives/Delegates as well as to all Statehouse/Capitol staff every courtesy including *Thank you*.

Clean up! Straighten up any room one uses. Any papers one no longer wants, put in trash can. Leave every room clean.

Thank you for all your efforts to follow these guidelines.

# Ohio-West Virginia Youth Leadership Association



## Introduction and Purpose

Both Ohio and West Virginia's Youth in Government programs grew out of and continue to extend the impact of our youth programs in our two states.

Ohio's program began in 1952 and West Virginia's in 1958.

YLA Youth in Government reflects the idea that *"democracy must be learned by each generation"* and is based on Thomas Jefferson's belief that, *"the purpose of education is to create good citizens of the community"*.



C. William O'Neill, 1952 founder of Ohio HI-YLA Youth in Government.

Our founders, the late C. William O'Neill, the only person in Ohio history to serve as Attorney General, Speaker of the House, Governor and Chief Justice, and the late Governor Cecil Underwood, West Virginia's youngest and then oldest Governor, worked with our students, volunteers and staff to create Youth in Government in each state. Both leaders recognized our unique role in engaging teenagers in improving their homes, schools, and communities. They responded to teenagers who wanted to extend this influence and leadership statewide.

*"This is truly a seedbed of leadership,"* said O'Neill. *"We produce much needed local and state leadership,"* Governor Underwood stated when helping launch West Virginia's Youth in Government. He went on to say, *"The future of our nation depends upon the caliber of young people who will soon assume positions of leadership in our country. Youth in Government will provide a year-round laboratory experience in practical politics. Youth will be able to study public issues, debate public policies, write legislation, and actually participate in the process of government."*



WVYG Founder Governor Cecil Underwood, 40th Youth Governor Laurel Lackey Basil and 1st Youth Governor Rebecca Colebank Duckworth at YG's 50th anniversary.

Both founders wanted Youth in Government to be more than just passing legislation. In fact, both thought the last thing needed to solve a problem was more legislation. What was needed were young people seeing what needs done to make their communities better, figuring out what to do and then doing it. Legislation is a last resort. Student

legislation proposed to Youth in Government would come out of a student's real life and volunteer experience.

O'Neill and Underwood believed in and supported our approach to leadership development. They saw lives changed as teens changed their world. Our time-tested learn by doing model of leadership development works as teens identify the kind of school and community they want, create, and carry out initiatives to achieve their vision and reflect on their work to strengthen future action. Both of our Youth in Governments continue to build on this foundation.

## Citizenship is our Purpose

Simply put, YLA Youth in Government is about citizenship, not politics or political careers. Everyone's job is citizen. After that comes our life's work. From presidents to governors and janitors, we all have the same job – citizen. Youth in Government brings together students of all backgrounds, interests, and experience to broaden our understanding of democratic citizenship by engaging in the process of state government.

Youth in Government is one of YLA's programs offered to every school and community by the Ohio-West Virginia Youth Leadership Association. YLA is a resource providing technical assistance, program development, manuals, materials, training, newsletters, idea exchanges, state and national youth leadership conferences and camps.

## YLA Philosophy of Leadership

YLA believes each person is responsible for the life of their community and to help others as well as the community achieve their potential.

YLA believes that civic leadership has little to do with power and everything to do with responsibility. What counts is individual and group character. YLA promotes *Respect - Responsibility - Caring - Trustworthiness - Honesty - Fairness - Citizenship*.

## Learning Style

YLA's service-learning approach enables students to connect classroom lessons, life experience and active engagement in community building to their service as Legislators, Supreme Court Justices, Officers, Lobbyists, Press or Page delegates to the Model Legislature or Supreme Court. The American governmental process unfolds with deeper understanding as students seek to solve pressing issues through the Student Legislature and Supreme Court.

## Board and Committee

A volunteer board of twenty members governs the Ohio-West Virginia Youth Leadership Association. Board appointed committees and volunteers secure the resources our programs require to succeed, work to achieve YLA's mission and goals, and extend YLA programs to every interested community.

## Staff

The YLA Board employs an Executive who is responsible to employ other staff and to engage volunteers to carry out Board policies, the work of committees and volunteers as well as our youth programs.

Contact YLA at [www.ylaleads.org](http://www.ylaleads.org); 304.675.5899



**Ohio-West Virginia Youth Leadership Association**  
*Preparing the Next Generation of Civic Leaders*  
**Leadership Character Service Entrepreneurship Philanthropy**

**YLA**

*YLA youth groups* are incubators of civic leadership! Teens learn what it takes to plan, organize, and work out-through trial and error-how to make their schools, communities, and world a better place to live. *This is the best thing I've done in school. I've learned so much, gained confidence I never dreamed I could have, got involved and now I am ready for the future!*

**Youth in Government**

Where else do teenagers get to "take over" the state capitol for three days? *This is great! We get to be legislators sitting in the same seats and using the same facilities they use. I've learned more about civics and state government this way than from any book or classroom. We take what we learn in class and get to apply it. Some of the laws we propose have actually become state law. Judicial is great! We get to see how the judicial system works. I don't want to be an attorney, but I need to understand the court.*

**Youth & Government Seminars**

*Youth & Government Seminars* offer West Virginia 8th graders and Ohio middle school students an opportunity to witness first-hand how their state government works through observation and interaction with government officials during a legislative session.

**Model United Nations**

*YLA Model United Nations* offers a "window on the world" opportunity for students to participate and experience a personal perspective in solving global and international issues. *Model UN is a great way to learn about the world. I came into this program with no knowledge about the UN or my nation. I left with that knowledge plus the ability to think as my nation and a greater appreciation for other nations.*

**Horseshoe Leadership Center**

Nestled in West Virginia's Appalachian Mountains, *Horseshoe's Teen Entrepreneurship and Leadership-Service Summits* are exceptional experiences for teens to network, work together, and learn how they can "make a difference" in their world for a better future. *This literally was the best week of my life. I'm going home a new person; I know who I am!*

Later in the season, *Youth Opportunity Camps* help low income 7 - 12-year-old boys and girls get on the path toward success. *I see differences Horseshoe makes to kids' lives in just one week. They feel safe here, they get to be themselves here, they can forget about their worries here. Kids may come with nothing but are given something priceless that lets them know someone cares!*

**Cave Lake**

*Cave Lake*, a place of rare natural beauty in Ohio's Appalachian region, is being transformed into a nationally significant year-round-learning center for youth, adults, and families. Cave Lake's 700 acres offer unsurpassed opportunities for leadership development, as well as a peaceful atmosphere for personal and group growth, enjoyment of the out-of-doors, the arts, music, entrepreneurship, civic responsibility, and stewardship of our natural heritage. Cave Lake will strengthen and expand the base of effective family, organizational and community leadership across Ohio.

**Alumni**

*Alumni* bring commitment, experience, and new support to all our youth programs. Our new Alumni Program offers many ways to stay involved, to share leadership advancing all our programs and to offer YLA experiences to many more young people.

<p><b>Ohio-West Virginia Youth Leadership Association</b>          YLA Chapters, Youth in Government, 8<sup>th</sup> Grade Youth &amp; Government Seminars, Model United Nations, Horseshoe, Cave Lake  <a href="http://www.ylaleads.org">www.ylaleads.org</a></p>		
<p>Youth Leadership Association          Fiscal office: 522 Sandhill Road          Pt. Pleasant, WV 25550          P: (304) 675-5899 F: (304) 675-5977</p>	<p>Cave Lake Leadership Center          1132 Bell Hollow Road          Latham, OH 45646          P: (937) 588-3252 F: (937) 588-3252</p>	<p>Horseshoe Leadership Center          3309 Horseshoe Run Road          Parsons, WV 26287          P: (304) 478-2481 F: (304) 478-4446</p>





## Ohio-West Virginia Youth Leadership Association Ohio – Preamble to the Constitution - 1851

We, the people of the State of Ohio, grateful to Almighty God for our freedom, to secure its blessings and promote our common welfare, do establish this Constitution.

## United States of America – Preamble to the Constitution - 1787

We the people of the United States, in order to form a more perfect union, establish justice, ensure domestic tranquility, provide for the common defense, promote the general welfare, and secure the blessings of liberty to ourselves and our posterity, do ordain and establish this constitution for the United States of America.

## Bill of Rights

The first ten Amendments to the Constitution of the United States  
Ratified effective December 15, 1791

### Amendment I

Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press, or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

### Amendment II

A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.

### Article III

No Soldier shall, in time of peace be quartered in any house, without the consent of the Owner, nor in time of war, but in a manner to be prescribed by law.

### Amendment IV

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

### Amendment V

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb, nor shall be compelled in any criminal case to be a witness against himself, nor be

deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use without just compensation.

Amendment VI

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed; which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

Amendment VII

In suits at common law, where the value in controversy shall exceed twenty dollars, the right by a jury shall be otherwise re-examined in any Court of the United States, then according to the rules of the common law.

Amendment VIII

Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

Amendment IX

The enumeration in the Constitution of certain rights shall not be construed to deny or disparage others retained by the people.

Amendment X

The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people.

## Ohio Constitution – Preamble – 1851

We, the people of the State of Ohio grateful to Almighty God for our freedom, to Secure its blessings and promote our common welfare, do establish this Constitution.



# Student Judiciary Overview

The Supreme Court considers an appeal of a lower court decision. The presiding officer of the Supreme Court is the Chief Justice.

	Ohio	West Virginia
Official Name	<i>Supreme Court of Ohio</i>	<i>West Virginia Supreme Court of Appeals</i>
Number of Justices	7	5
Length of Term	<i>6 years</i>	<i>12 years</i>

- Decisions of the Supreme Court are a majority vote of the Justices. These decisions are the final word.
- A case appealed to the Supreme Court is an appeal only on errors claimed to have occurred in the local trial. It is NOT a retrial of the local trial.
- The authority of the Supreme Court comes from the individual state's Constitution.
- The appellant is appealing the decision of a lower court.
- The appellee is supporting the decision of the lower court.
- The Brief summarizes the validity or lack of validity of the lower court's decision. An
- Assignment of Errors lists the mistake(s) that either the Judge or Jury made in lower court decision.
- Arguments made in an appeal describe laws or precedent cases that support the argument.
- The concluding presentation to the Supreme Court summarizes arguments in the appeal and a conclusion the Supreme Court should reach.

# Writing Your Appeal

When you register as a Judicial Delegate through the Participation Agreement, your advisor will receive the sample case for each judicial team. Our program picks up at the conclusion of the local trial. Students will choose a side to represent. The losing side (Appellant) will appeal the decision of the lower court and the winning side (Appellee) will be asking the Supreme Court to uphold the existing decision of the lower court.

The appeal IS NOT A RETRIAL, but rather is an opportunity to insure that justice is served in regard to the process of the local trial. At the appeal hearing, you will argue points of law. It is the Appellant's responsibility to research precedent cases and other laws that would show error in the local trial verdict.

The Assignment of Errors lists the Appellant's reasons the case is being appealed to the Supreme Court. The appellants will argue that these errors in the lower court trial, if corrected, could have changed the outcome of the lower court's verdict. Therefore, they appeal. Students may research previous cases at college or local law libraries or through the LEXUS/NEXUS computer system. Local attorneys are also excellent resources.

On the other side, the Appellees seek to support the lower court's verdict.

Your written brief should be between 2-6 pages in length. This is your first impression on the justices and should concisely and logically progress through your arguments to convince the Justices of your Conclusion.

When you appear before the Supreme Court in April, you will have additional time for Oral Arguments. Each side will have 10 minutes (approximately 5 minutes per attorney) to argue your side of the case. Your opponents will also have ten minutes. It is your responsibility to decide how you will split the time with your partner – but, both attorneys must share in the presentation. The appellants may reserve a portion of their time for rebuttal, if desired.

## Purpose and Contents of a Brief

The purpose of the Brief is to summarize the validity or lack of validity of the Lower Court's decision. Unless otherwise noted, the format for the brief is as follows: Paper size – 8.5" x 11" (one side only, DO NOT staple and remember to sign your name), Margins – 1", single spaced (except between sections -see sample brief), Type size – 10 or 12 point. There must be one (1) booklet and it must contain the following:

1 COVER PAGE:	The Cover Page has the following information: Names and Positions of both pairs of Youth Attorneys	Name of the Case
1 STATEMENT OF FACTS	Must be agreed upon by both sets of Youth Attorneys	
1 APPELLANT'S BRIEF	Written by the Youth Attorneys that LOST the local trial. Must be between 2 – 6 pages. Each brief contains: Assignment of Errors – the problem that either the Judge or Jury made in their Lower Court decision. Arguments – Laws and/or precedent cases that support your Assignment of Errors. Conclusion – A closing summary of the case and a conclusion that the Model Supreme Court should overturn the Lower Court's decision.	
1 APPELLEE'S BRIEF	Written by the Youth Attorneys that WON the local trial. Must be between 2 – 6 pages. Each brief contains: Arguments – Laws or precedent cases that support the Lower Court's decision. Conclusion – Summary of arguments in the case and a conclusion that the Model Supreme Court should therefore uphold the Lower Court's decision.	

ALL OF THIS CONSTITUTES ONE BOOKLET. THE BOOKLET IS TO BE ASSEMBLED IN THE ORDER LISTED AND STAPLED ONCE IN THE UPPER LEFT CORNER. EIGHTEEN (18) COPIES OF THE BOOKLET ARE TO BE ASSEMBLED AND SUBMITTED TO THE YOUTH IN GOVERNMENT OFFICE BY THE DEADLINE (OHIO-JAN 28 • WV – FEB 10).

## Case Rating

All cases submitted will be rated for position on the docket of the Student Supreme Court. Only those cases that are received in the Youth in Government office by the due date will be rated.

# Student Supreme Court Procedures

When the Justices enter, everyone rises. The Marshal (Ohio) or Clerk (WV) calls the Court to order.

## OHIO

All Rise. . .The Honorable Chief Justice and Justices of the Supreme Court of Ohio Once they have reached their seats, continue with...)  
Hear Ye! Hear Ye! Hear Ye! The Supreme Court of Ohio is Now in Open Session Pursuant to Adjournment. . .

## WEST VIRGINIA

All Rise. . .OYEZ! OYEZ! The Honorable Justices of the Supreme Court of West Virginia, the Honorable Chief Justice \_\_\_\_\_, presiding. Silence is now commanded under penalty of fine or imprisonment, while the Honorable Justices of the Supreme Court of Appeals of West Virginia are now sitting. All those having motions to make or appeals to prosecute, come forward and you shall be heard. GOD SAVE THIS STATE AND THIS HONORABLE COURT.

The Chief Justice will direct the audience to be seated.

The Chief Justice then calls on the Appellant attorneys. The first attorney for the Appellant informs the Marshal/Clerk whether or not there will be a rebuttal and if so, how much time is to be reserved. The Appellant attorneys then present their argument. The reasoning in their argument is that the verdict of the lower court was incorrect because \_\_\_\_\_.  
(Each side has 10 minutes – approximately 5 minutes per attorney in which to present their case.)

The Appellee's attorneys then present their argument. The reasoning in their argument is that the verdict of the lower court was correct and the Appellant is incorrect because \_\_\_\_\_.

The Appellant's attorneys then have an opportunity for rebuttal after the Appellee's attorney's presentation. Following this, the Chief Justice adjourns the Court to decide the Appeal. The reversal of the lower court's decision requires at least a majority vote for reversal. When directed by the Chief Justice, the Marshal will call the Court to adjournment.

## OHIO

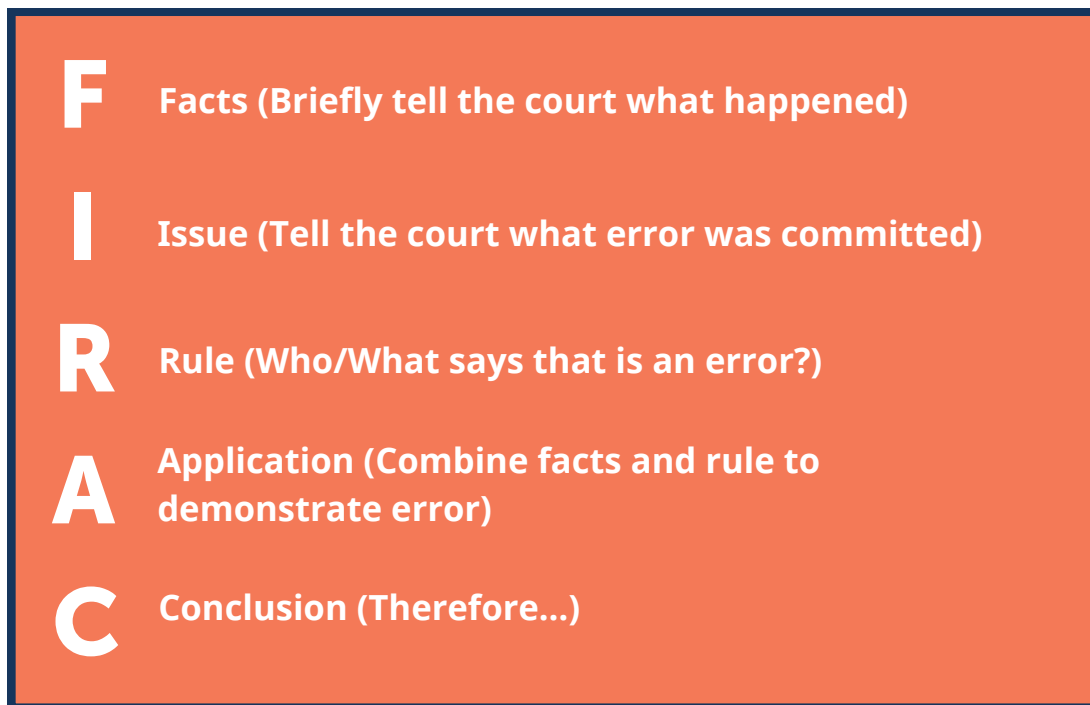
All Rise. . .Hear Ye! Hear Ye! Hear Ye! This Open Session of the Honorable Supreme Court of Ohio Now Stands Adjourned. (After the last Justice is off the Bench, strike the gavel once.)

## WEST VIRGINIA

All Rise. . .Hear Ye! Hear Ye! Hear Ye! This Open Session of the Honorable Supreme Court of West Virginia Now Stands Adjourned. (After the last Justice is off the Bench, strike the gavel once.)

Time organization is a very important part of your appeal. The job of the Supreme Court Marshal/Clerk is to time the oral presentation of each attorney – informing the attorney when one minute is left in the allotted time and when the time is up. Both sets of attorneys need to decide how much time each attorney on their side will take. Also, attorneys for the Appellant must decide how much time to reserve for rebuttal.

Attorneys will prepare the majority of their oral arguments before reaching Youth in Government. Time at Youth in Government will be used to sharpen those arguments. A simple method to use to organize a brief or an oral argument is the **FIRAC method**.



- F** Facts (Briefly tell the court what happened)
- I** Issue (Tell the court what error was committed)
- R** Rule (Who/What says that is an error?)
- A** Application (Combine facts and rule to demonstrate error)
- C** Conclusion (Therefore...)

Attorneys should be prepared to be interrupted by questions from the Justices. In organizing an oral presentation, an attorney should be prepared to speak persuasively for the full amount of time, but the attorney should be flexible enough to rearrange their presentation at the podium in order to cover all of the important points, in addition to answering questions from the Justices.

The attorneys start their presentation with the statement May it please the court. My name is (state your name) and I am the attorney for or representing (state your client's name)

Always keep your perspective. Act zealously for your client, but remember you are an officer of the court.

You are to attend all judicial program events. They are designed to give you the opportunity to learn more about our judicial system. You will also watch the appeals of other students. Much can be learned by watching others.

Your case will be put on a calendar and assigned a time to be heard by the Model Supreme Court. Attorneys for the local trial must be the same ones to present the case at the Model Supreme Court.

# Justice's Written Opinions

The Opinion is the written decision of the Supreme Court. It is the official document that records for history the decision and all of the relevant circumstances that influenced that decision. The opinions are reviewed by each Justice sitting on the case and are not disclosed to other participants until they are officially "released" during the closing session.

During deliberation, immediately following the case, you will have an opportunity to discuss and argue the points of law addressed in the case. One or more Justices will volunteer to write the opinion for the majority. The opinion is given to each Justice to study and accept. If it is accepted, the Justice will sign the opinion and it is passed on as the opinion of the court. If not, a concurring opinion may be written (same result, but with a different line of reasoning).

Those who do not agree with the Majority Opinion summarize their views in the Dissenting Opinion. All of the opinions are presented to the public, but only the majority opinion affects the parties involved in the case.

Opinions will be written on standard legal paper (or forms provided by the Court Coordinator). The opinion will then be submitted to the Chief Justice or Associate Justices assigned to the case. Each opinion must contain a statement defining the reasons for the verdict and a narrative of why those reasons were chosen.

## Youth in Government Supreme Court Majority Opinion

\_\_\_\_\_ Case Number  
\_\_\_\_\_ All Justices who agree with this  
\_\_\_\_\_ Majority opinion are to sign their  
\_\_\_\_\_ Names to the left  
\_\_\_\_\_ Opinions will be announced on  
\_\_\_\_\_ Saturday Morning. Until then,  
\_\_\_\_\_ The decisions of the Court are not  
\_\_\_\_\_ to be discussed with anyone.

## Youth in Government Supreme Court Minority Opinion

\_\_\_\_\_ Case Number  
\_\_\_\_\_ All Justices who agree with this  
\_\_\_\_\_ Minority opinion are to sign their  
\_\_\_\_\_ Names to the left  
\_\_\_\_\_ Opinions will be announced on  
\_\_\_\_\_ Saturday Morning. Until then,  
\_\_\_\_\_ The decisions of the Court are not  
\_\_\_\_\_ to be discussed with anyone.

## Officer Responsibility

Officers are elected at Youth in Government to serve through the next year's program. Their service throughout the year provides student leadership to the program, helps strengthen the program for everyone, and better prepares officers for their duties during the Student Legislature/Court.

Officers put Youth in Government first. They must have and take the time required to effectively serve the program.

In addition to Youth in Government at the Statehouse/Capitol, the officers "do their jobs" at the annual Sr. Leadership-Service Conference in June at Horseshoe, the Fall Program Conference in November and the February Officer/Committee Chair Training – Bill and Case Rating Session.

Additional responsibilities/qualifications include:

### Chief Justice

- Appoint qualified Associate Justices as needed,
- Serve on the Youth in Government Committee,
- Study all cases before the Student Supreme Court,
- At Youth in Government
  - Present an opening address,
  - Give a closing summary of the Supreme Court,
  - Announce the new youth Chief Justice,
  - Assist Judicial Coordinator as necessary.

## **Associate Justices**

- Study all cases before the Student Supreme Court,
- Preside over cases assigned to you by the Chief Justice and summarize the opinions of the panel

## **Elections and Appointments for State Office**

### **Nominations**

Each delegation may nominate one (1) candidate for Chief Justice. Nominations are due and to be submitted on the Officer Candidate Form by 7 pm at Youth in Government Office on Saturday. Nominees must meet the qualifications listed for their office.

### **Officer Qualifications**

Qualifications common to the office of Chief Justice include:

1. One year's experience in Youth in Government as a judicial delegate. Unlike other elected offices in Youth in Government, Chief Justice Candidates may count their current year toward this requirement.
2. Will attend the Leadership-Summit Camp at Horseshoe in June, the Officer Training/Bill Rating session in February, Fall Conference in November and the Youth in Government program at the Statehouse/Capitol.
3. Positive group work skills and attitudes that help all others succeed.
4. Effective public speaking and presentation skills.
5. Understands the Youth in Government procedure and is able to implement it.
6. Has leadership skills appropriate to the purpose of Youth in Government. Understands,
7. supports, and practices the values of leadership through service promoted by YLA.

## **Election Procedure at Youth in Government**

Candidates demonstrate their ability to carry out the responsibilities of the position they seek by "doing" what the office requires. There is no campaign, campaign speech, or campaign material.

Having demonstrated their effectiveness to their peers throughout the weekend, Chief Justice Candidates will have 3 minutes to summarize their vision of the Judicial Program to the Student Supreme Court participants. The candidate receiving the majority of votes is declared the winner. Only Judicial delegates vote for the Chief Justice.

## **Associate Justices**

Associate Justices are appointed by the Chief Justice from those qualified applicants who submit their application no later than one week after Youth in Government.

# Definition of Terms

**Appellant** [uh-pel-ent] – The party who loses the local trial and appeals to the Supreme Court.

**Appellee** [a-puh-lee] – The party who won the local trial and responds to the appeal of the appellant.

**Argument** - The persuasive reasoning by the attorney to the deciding body (judge or jury) stating why the case should be decided in favor of his client. Arguments, whether oral or written, should present clear thinking and logical statements that lead to only one conclusion.

**Bailiff** - The officer of a trial court who opens, recesses, reconvenes and closes each session of the court.

**Bill of Exception** -The verbatim transcript of everything that is said at the local trial relevant to the issues being appealed.

**Brief** - The formal written statement prepared by both parties of an appeal listing the errors (appellants only), their arguments and conclusions.

**Chief Justice** - The presiding Justice of the Supreme Court.

**Conclusion** - Making a definite statement within your facts. The logical end to a line of reasoning.

**Court Reporter** - The officer of the court who records everything said by everyone at each session of the court.

**Damages** - In most cases, the reward received by the plaintiffs, if they win.

**Defendant** - The party being charged with the alleged wrongdoing.

**Dissenting Opinion** - The written decision of the judge(s) in the minority on a case.

**Expert witness** - A witness who, because of their knowledge or experience, can offer technical expertise to the court within their area or profession.

**Evidence** - Information obtained by testimony of witnesses or introduction of objects or documents at a trial which the jury considers in reaching its verdict.

**Judge** - The one who presides at a trial and, if there is no jury, also decides the case.

**Jury (Panel)** - A group of citizens who hear the evidence at trial and decide disputed questions of fact (verdict). The group is known as a panel during the voir dire and after taking the oath as jurors, is known as the jury.

**Justice** - The formal name given to a Judge of the Supreme Court.

**Marshal** - The officer of a trial court who opens, recesses, reconvenes, and closes each session of the court.

**Narrative Bill of Exceptions** - A written statement of the facts according to testimony at the local trial agreed upon by opposing Attorneys. This is used in lieu of the Bill of Exceptions when a court reporter is not present.

**Notice of Appeal** - Statement asking for a reversal of the lower court's judgment.

**Objection** - Any oral statement to the judge voiced by an attorney during trial showing why a certain question or answer constitutes improper evidence.

**Opinion** - The written decision of the judge or judges, supported by their reasoning, of a case which has been argued on appeal.

**Peremptory Challenge** - Prerogative of counsel to object to a member of the panel during voir dire.



2024 73rd Annual

OHIO

# OHIO SUPREME COURT



TOMORROW'S LEADERS  
START TODAY



## YOUTH LEADERSHIP ASSOCIATION

**Youth Governor  
Maggie Gilmore**  
*Washington CH YLA*

**Youth Chief Justice  
CeCe Stamper**  
*Western YLA*

APRIL 1<sup>st</sup>, 2025

CASE	<b>Youth Supreme Court Docket</b>	
1	<p style="text-align: center;"><b>City of Centerville v Brad Whitecuff</b></p> <p>Cannon Stiffler Bralee Lyons Attorneys for the Appellee</p> <p style="text-align: right;">Zoie Ervin Sophie Williams Attorneys for the Appellant</p> <p><b>JUSTICE:</b> CeCe Stamper, Jacob Allen, Armaan Chaudhary, Tessa Risner, Aden Crabtree, Jake Malloy, Isabel Shihab <b>MARSHALL:</b> Kollier Fulton</p>	
2	<p style="text-align: center;"><b>Sean Talt v The State of Ohio</b></p> <p>Jake Malloy Attorney for the Appellant</p> <p style="text-align: right;">Armaan Chaudhary Attorneys for the Appellee</p> <p><b>JUSTICE:</b> Kollier Fulton, Sabella McCarty, Deonna Huston, Rowyn Hubbard, Cannon Stiffler, Christopher Crabtree, Drew Neff <b>MARSHALL:</b> Ryan LeFever</p>	
3	<p style="text-align: center;"><b>The State of Ohio v Green</b></p> <p>Ryan LeFever Drew Neff Attorneys for the Appellee</p> <p style="text-align: right;">CJ Crabtree Jacob Allen Attorneys for the Appellant</p> <p><b>JUSTICE:</b> CeCe Stamper, Zoie Ervin, Bralee Lyons, Sophie Williams, Armaan Chaudhary, Isabel Shihab, Kollier Fulton <b>MARSHALL:</b> Rowyn Hubbard</p>	
4	<p style="text-align: center;"><b>Officers Smith and Jones v Mr. Chandler</b></p> <p>Rowyn Hubbard Attorneys for the Appellee</p> <p style="text-align: right;">Isabel Shihab Attorneys for the Appellant</p> <p><b>JUSTICE:</b> Tessa Risner, Sabella McCarty, Deonna Huston, Jake Malloy, Jacob Allen, Ryan LeFever, Aden Crabtree <b>MARSHALL:</b> Zoie Ervin</p>	
5	<p style="text-align: center;"><b>Ricky Bennett v Jeffrey Sims</b></p> <p>Aden Crabtree Attorney for the Appellee</p> <p style="text-align: right;">Sabella McCarty Deonna Huston Attorneys for the Appellant</p> <p><b>JUSTICE:</b> CeCe Stamper, Kollier Fulton, Tessa Risner, Cannon Stiffler, Sophie Williams, Drew Neff, Bralee Lyons <b>MARSHALL:</b> Christopher Crabtree</p>	

OHIO YOUTH IN GOVERNMENT 2024

# Practice Case



State of Ohio v Blevins

# **State of Ohio v Blevins**

## Montgomery County Prosecutor's Office

### INTRAOFFICE MEMORANDUM

TO: Legal Counsel (Appellee Counsel)  
FROM: Brandon A. Wright, Litigation Chief  
Council for Plaintiff/Appellee-State of Ohio  
DATE: December 10, 2019  
RE: State of Ohio v. Justin Blevin

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Counselors, as you have already heard, the Court of Appeals ruled in our favor by upholding the lower court's drug conviction of the defendant/appellant, Justin Blevin, for possession and trafficking in heroin. The Court of Appeals determined that: (1) Mr. Blevin did not have standing to challenge the police agents pinging of a cell phone belonging to his wife; (2) Montgomery County deputy had probable cause to stop Blevin's vehicle based on information received from informants; and (3) Blevin's Fifth Amendment rights against self-incrimination were not violated. Although I could not be more thrilled with the outcome, it appears our work is not finished since Mr. Blevin requested and has been granted a discretionary appeal with the Ohio Supreme Court. I am sure this is not surprising to you given the complicated facts surrounding this case.

Based on excellent work you both have performed for this office, I would like you take the lead on this case. The facts of the case and the corresponding case law are attached hereto. Please compile your Appellee Brief using the issues outlined in Mr. Blevin's assignment of errors on the last page of this document. Expect your oral arguments to be scheduled sometime in early-April.

Best of luck to you both, I'm sure you will knock this out of the park.

---

Brandon Arthur Wright, III

**Kennedy & Scalia, LLP**  
*Attorneys at Law*  
**1 Public Square**  
**Dayton, Ohio 44401**

INTRAOFFICE MEMORANDUM

TO: First-year Associate (Appellant Counsel)  
FROM: Sandra Kennedy, Managing Partner  
Counsel for Defendant/Appellant-John Blevin  
DATE: December 10, 2019  
RE: State of Ohio v. Justin Blevin

---

Counselor, as you have already heard, the Court of Appeals ruled against our client, Mr. Blevin, and affirmed his conviction by the trial court for possession and trafficking in heroin. The Court of Appeals determined: (1) Mr. Blevin did not have standing to challenge the police agents pinging of a cell phone belonging to his wife; (2) Montgomery County deputy had probable cause to stop Blevin's vehicle based on information received from informants; and (3) Blevin's Fifth Amendment rights against self-incrimination were not violated.

This ruling was a surprise considering the strong arguments we presented. Due to the questionable decision we requested and have received a discretionary appeal with the Ohio Supreme Court. Unfortunately, due to my work schedule, I am unable to continue with this case. Enclosed are the facts and ruling of the case. Please look at the facts carefully and prepare a court brief discussing the assignment of errors listed below. If everything goes as planned, you should expect to present your arguments orally to the Justices of the Court sometime in April.

With the amount of work that will be needed, I have decided to assign another attorney to assist you in this case. I have no doubt that the two of you will do well based upon the work you have already produced for this office. Good luck!

---

SANDRA O. KENNEDY

## STATEMENT OF FACTS

Defendant-appellant, Justin Blevin, appeals his conviction and sentence in the Montgomery County Court of Common Pleas for trafficking in heroin.

The Montgomery County Undercover Regional Narcotics Unit (NU) received a tip from a confidential informant that Blevin was transporting heroin from the East Coast to Ohio. The informant gave NU agents Blevin's name and address, along with information that several heroin overdoses in the area could be attributed to the heroin Blevin was selling. Agents also learned that Blevin would rent a car and take his family with him on the trip to the East Coast to retrieve the heroin, usually in and around the Boston, Massachusetts area. Blevin's family included his wife and two children, ages 14 and 6. NU agents received similar information from 3 other trusted informants and cooperating defendants, including that Blevin was soon going to go to Boston for a large heroin purchase and would be bringing the heroin back to Ohio. It was also revealed that Blevin's in-laws live in the Boston, Massachusetts area.

NU agents began an investigation, which included surveillance on Blevin's home. Agents learned from their confidential informants that Blevin was about to take a trip to Boston to purchase heroin, and through surveillance, confirmed that a rental car was located at Blevin's home. Blevin, along with his wife and two children, then left for Boston in the rental car.

Once the car had departed, agents continued their investigation and performed a trash-pull at Blevin's residence. During the trash-pull, agents located a paper that listed various phone numbers. Agents received a warrant related to Blevin's cellular phone, allowing them to "ping" the cell phone in order to determine Blevin's physical location. However, when the number associated with Blevin was found to be invalid, agents received a warrant associated with another phone number that was listed on the paper found during the trash-pull, which subsequently was discovered to belong to Blevin's wife. Agents "pinged" the phone belonging to Blevin's wife, and determined that the phone was located in Massachusetts. Agents later traced

the pings from Massachusetts to Ohio as the Blevins traveled back toward Montgomery County. The phone owned by Blevin's wife was part of a phone plan that he and his wife shared. Their monthly bill for the phone plan was mailed to their house and was always addressed to Mr. Blevin's wife, who initially purchased the phones for her and her husband. The phone bill was usually paid with a check associated with a bank account jointly held by Blevin and his wife.

Agents shared information learned from the investigation with the Montgomery County Sheriff's Office regarding the confidential informants' tips and surveillance of Blevin's residence. Montgomery County Sheriff officers then became involved in the investigation and offered assistance in performing an investigatory stop when Blevin returned from Boston to the Montgomery County area.

After following Blevin's rental car, NU agents instructed Deputy Shannon Killenbrew, officer with the Montgomery County Sheriff's office, to pull over Blevin's car for an investigatory stop. Deputy Killenbrew had assisted the NU agents several days prior by running the license plates of the car parked in front of Blevin's residence to confirm that it was a rental. Deputy Killenbrew pulled Blevin's car over, and within a few minutes, a canine officer arrived on the scene and walked his canine partner around Blevin's car. The canine alerted the officers to the presence of drugs, and officers found marijuana in the drivers-side door as well as heroin in a suitcase located in the rental car's trunk. Deputy Blevin testified that she read Blevin his *Miranda* warnings immediately upon finding the drugs in his car and that afterward Blevin stated to her that he had driven straight from Boston without stopping and was tired. Blevin was then taken to the police station, where he spoke with one of the NU agents who testified that they re-advised Blevin of his *Miranda* rights.

Testimony provided during Blevin's trial, indicated that the audio and video recording equipment routinely used by NU agents and the Montgomery County Sheriff's office when performing interviews of suspects, malfunctioned during Blevin's interview, and does not show Blevin's being informed of his *Miranda* rights or consenting to waive them and speak with the NU agent.



Blevin was arrested and charged with trafficking in heroin, as well as possession of heroin. Blevin filed a motion to suppress, asking the court to suppress the heroin seized during the investigatory stop, as well as statements he made to the agents. After a hearing on the issue, the trial court overruled Blevin's motion to suppress. Blevin then pled no contest to the charges, and the trial court found him guilty of both counts. The trial court sentenced Blevin to a mandatory prison term of 11 years. Blevin appealed his case to the appellate court, which upheld the trial court's ruling. Blevin now appeals his conviction and sentence, raising the following three assignments of error.

## ASSIGNMENT OF ERRORS

**I. Illegal Search – GPS:** Blevin alleges the lower court erred in overruling his motion to suppress evidence, because the GPS pinging information used to locate him was an illegal search; Blevin argues that agents did not have **probable cause** to support the warrant issued that allowed them to ping the phone to indicate the location of him or his family. However, the State contends that Blevin lacks standing to challenge the legality of the search due to the fact that the phone did not belong to him, but rather his wife, that there is no reasonable expectation of privacy in data given off by a personal cell phone, and that a valid search warrant was issued allowing authorities to follow the pinging of the cell phone.

### Case Research

#### **A. Reviewing a Denial of a Motion to Suppress**

*State v. Cochran*, 12th Dist. Preble No. CA2006-10-023, 2007-Ohio-3353

*State v. Oatis*, 12th Dist. Butler No. CA2005-03-074, 2005-Ohio-6038

#### **B. “Personal” Rights**

*Rakas v. Illinois*, 439 U.S. 128, 133, 99 S.Ct. 421, 58 L. Ed. 2d 387 (1978)

*State v. Coleman*, 45 Ohio St.3d 298, 306, 544 N.E.2d 622 (1989)

*State v. Renner*, 12th Dist. Clinton No. CA2002-08-033, 2003-Ohio-6550

*United States v. Salvucci*, 448 U.S. 83, 100 S.Ct. 2547, 65 L. Ed. 2d 619 (1980)

*State v. Crawford*, 8th Dist. Cuyahoga No. 98605, 2013-Ohio-1659

#### **C. Reasonable Expectation of Privacy**

*State v. Taylor*, 2d Dist. Montgomery No. 25764, 2014-Ohio-2550

*United States v. Skinner*, 690 F.3d 772, 777 (6th Cir.2012)

#### **D. Search Warrant & Probable Cause**

Ohio Crim.R. 41(C)

*State v. George*, 45 Ohio St.3d 325, 544 N.E.2d 640 (1989)

*State v. Akers*, 12th Dist. Butler No. CA2007-07-163, 2008-Ohio-4164

**II. Warrantless Search – Lack of Reasonable Suspicion / Probable Cause:** Blevin alleges the lower court erred in overruling his motion to suppress evidence by upholding the warrantless

search and seizure of his vehicle; Blevin argues the investigatory stop made on his vehicle was illegal, because the stop was not the result of a traffic violation, and officers had no **reasonable suspicion** of criminal activity to justify the stop. Additionally, Blevin contends that the deputy who performed the stop had no personal knowledge regarding Blevin's suspected involvement in drug activity and was instead merely acting on orders when he initiated the stop. However, the state contends that the information their agents obtained during the investigation was sufficient to provide a reasonable suspicion of criminal activity necessary to justify the stop and that the deputy performing the stop had sufficient personal knowledge of Blevin's alleged criminal activity.

### **Case Research**

#### **A. Investigatory Stop & Reasonable Basis for Intrusion (Totality of the Circumstances)**

*State v. Cochran*, 12th Dist. Preble No. CA2006-10-023, 2007-Ohio-3353, ¶ 13

*Terry v. Ohio*, 392 U.S. 1, 21, 88 S.Ct. 1868, 20 L. Ed. 2d 889 (1968)

*City of Maumee v. Weisner*, 87 Ohio St.3d 295, 299, 1999 Ohio 68, 720 N.E.2d 507 (1999)

*United States v. Cortez*, 449 U.S. 411, 417, 101 S.Ct. 690, 66 L. Ed. 2d 621 (1981)

*Alabama v. White*, 496 U.S. 325, 330, 110 S.Ct. 2412, 110 L. Ed. 2d 301 (1990)

**III. Miranda Rights – Violations:** Blevin alleges the lower court erred in overruling his motion to suppress evidence by upholding the numerous violations of his **Miranda** rights; Blevin contends that there is no recording that he signed a waiver of his rights and that his lack of sleep left him in no condition to voluntarily waive his Miranda rights. However, the State argues that a lack of recording of Blevin waiving his Miranda rights does not rebut other evidence supporting that such rights were read to him and that he waived those rights.

### **Case Research**

#### **A. Advisement and Waiver of Miranda Rights**

*State v. Hernandez-Martinez*, 12th Dist. Butler No. CA2011-04-068, 2012-Ohio-3754

*State v. Vunda*, 12th Dist. Butler Nos. CA2012-07-130, CA2013-07-113, 2014-Ohio-3449

*State v. Edwards*, 49 Ohio St.2d 31, 358 N.E.2d 1051 (1976)

*State v. Hernandez-Martinez*, 12th Dist. Butler No. CA2011-04-068, 2012-Ohio-3754



# CASE



## City of Centerville v Brad Whitecuff

# City of Centerville V. Brad Whitecuff

Brad R. Whitecuff  
Defendant (Appellee)

V.

Robert Hansel  
Prosecution (Appellant)

Cannon Stiffler  
Bralee Lyons  
Attorneys for the Appellee

Zoie Ervin  
Sophie Williams  
Attorneys for the Appellant

## STATEMENT OF FACTS

**Appellee, Brad R. Whitecuff, was arrested on August 20, 2015 for driving under the influence of alcohol, a violation of R.C. 4511.19(A)(1).** Appellee filed a motion to suppress evidence on October 1, 2015, arguing that the arresting officer lacked a specific and articulable basis to stop his car. A suppression hearing was held on October 9, 2015.

Centerville police officer Robert Hansel testified that he was on patrol on August 20, 2015 at approximately 6:22 p.m. when a dispatcher alerted him that a citizen caller had reported a suspected drunk driver. Specifically, the caller was driving behind the suspected drunk driver while he used his cellular phone to call the police. The caller reported the make, color, and license plate number of the car and described it as “weaving all over the road.” The caller also identified himself to the police dispatcher, providing his name, cellular and home phone numbers. This identification information was verified two days later by officer Hansel.

The caller continued to follow appellee’s car, describing its activities while officer Hansel attempted to locate it. When the caller alerted the dispatcher that the car had stopped at a railroad crossing, Hansel pulled into a parking lot opposite the railroad crossing to wait. After the train passed, Hansel spotted the car and radioed for verification. Approximately thirty to forty seconds elapsed, during which time Hansel did not witness the car either driving erratically or weaving. After receiving confirmation from the dispatcher, Hansel stopped the car, questioned the driver, Brad Whitecuff, and arrested him for driving under the influence of alcohol. Whitecuff later submitted to a breath analysis and was charged with operating a motor vehicle while having a prohibited concentration of alcohol in violation of R.C. 4511.19(A)(1).

Whitecuff moved to suppress the evidence obtained from Hansel’s stop of his car. At the hearing, the city called only Hansel to testify as to the events of that night. The trial court considered his testimony sufficient to show that he had reasonable suspicion that Whitecuff was driving under the influence and denied Whitecuff’s motion to suppress. Whitecuff then pleaded no contest to violating R.C. 4511.19(A)(1) and was sentenced to serve nine days in a drunk-driving intervention program.

Whitecuff appealed the constitutionality of the stop to the court of appeals. The court of appeals reversed the trial court's decision, holding that the city had failed to meet its burden of

proving that the dispatcher had reasonable suspicion to issue the dispatch and as such Officer Hansel did not have the requisite reasonable suspicion to perform an investigative stop. As part of its rationale, the court of appeals concluded that the city's failure to offer the testimony of either the dispatcher or the "anonymous" citizen caller during the suppression hearing rendered its evidence insufficient. The court of appeals did not consider Officer Hansel's testimony about the facts relayed from the caller to the dispatcher.

The case is now before the Ohio Supreme Court upon the allowance of a discretionary appeal to decide the constitutionality of a stop based upon a citizen informant's telephone tip.



## APPELLEE'S BRIEF

Brad Whitecuff challenges the constitutionality of his arrest, arguing that Officer Hansel lacked probable cause for the stop, the subsequent arrest, and that the court erroneously denied his motion to suppress evidence based on the "Fruit of the Poisonous Tree" doctrine.

### ARGUMENT 1: Officer Hansel had no probable cause to conduct the unconstitutional stop.

In the Constitution, the Fourth Amendment protects "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized." In this case, Whitecuff's Fourth Amendment was violated. In order to make a traffic stop you must have reasonable suspicion to justify the stop. Since The caller's information was NOT verified until 2 days after the arrest, there was no suspicion to make the traffic stop at that time.

### ARGUMENT 2: Officer Hansel had no reason to charge and arrest Brad Whitecuff.

The fruit of the poisonous tree states: "A rule under which evidence that is the direct result of illegal conduct on the part of an official is inadmissible in a criminal trial against the victim of the conduct." The "fruit of the poisonous tree" is rooted in the Fourth Amendment to the United States Constitution, which states: "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized." Therefore, all evidence obtained at the time of the stop is inadmissible, due to the "Fruit of the Poisonous Tree" doctrine stating: evidence illegally obtained is NOT admissible. Officer Hansel also reported, "Approximately thirty to forty seconds elapsed, during which time Hansel did not witness the car either driving erratically or weaving." Giving no probable cause to make the traffic stop. Officer Hansel also arrested whitecuff before the breath analysis according to this statement: "After receiving confirmation from the dispatcher, Hansel stopped the car, questioned the driver, Brad Whitecuff, and arrested him for driving under the influence of alcohol. Whitecuff later submitted to a breath analysis and was charged with operating a motor vehicle while having a prohibited concentration of alcohol in violation of R.C. 4511.19(A)(1)." This evidence shows Whitecuff was arrested before the breath analysis was taken.

### ARGUMENT 3: The court was incorrect when denying whitecuff motion to suppress

The fruit of the poisonous tree states: "A rule under which evidence that is the direct result of illegal conduct on the part of an official is inadmissible in a criminal trial against the victim of the conduct." The "fruit of the poisonous tree" is rooted in the Fourth Amendment to the United

States Constitution, which states: “The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.” Therefore, all evidence obtained at the time of the stop is inadmissible, due to the “Fruit of the Poisonous Tree” doctrine stating: evidence illegally obtained is NOT admissible. When Whitecuff moved to suppress the evidence, the court responded by denying his request. Which goes against the “Fruit of the Poisonous Tree” and is unlawful.

**CONCLUSION:**

The collective arguments constitute a substantive challenge to the constitutional validity of Officer Hansel's actions, raising profound concerns regarding the lawfulness of the traffic stop, arrest, and ensuing judicial decision. The conspicuous reliance on the "Fruit of the Poisonous Tree" doctrine imparts a weighty dimension to the discourse, contending that evidence derived from illicit conduct merits categorical inadmissibility. In essence, the contention posits a severe infringement upon Whitecuff's Fourth Amendment rights, and the court's denial of the motion to suppress is perceived as a pronounced transgression against principles of justice.

Respectfully Submitted,

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Cannon Stiffler

---

Bralee Lyons  
Attorneys for the Appellant

## APPELLANT'S BRIEF

### ASSIGNMENT OF ERRORS

There was an error in the court in the following manners:

1. The court is focusing more on whether on-trip calls should give access for an officer to pull over a car, than the fact that Whitecuff was drinking under the influence, and Officer Hansel was correct.
2. The court called only Officer Robert Hansel to the stand, instead of the caller, who drove behind Whitecuff.
3. Officer Hansel's testimony was dismissed, even after evidence against Whitecuff.

### ARGUMENTS:

**ARGUMENT 1-** Ohio Laws & Administrative Rules, Section 4511.19 (A)(1): (a)(b)(c) states, "No person shall operate any vehicle, streetcar, or trackless trolley within this state, if, at the time of the operation, any of the following apply: (a) The person is under the influence of alcohol, a drug of abuse, or a combination of them. (b) The person has a concentration of eight-hundredths of one per cent or more but less than seventeen-hundredths of one percent by weight per unit volume of alcohol in the person's whole blood. (c) The person has a concentration of ninety-six-thousandths of one per cent or more but less than two hundred four-thousandths of one percent by weight per unit volume of alcohol in the person's blood serum or plasma. Whitecuff claimed that he had not gone against the law stated above, although after taking a breath analysis test was charged with a OMVI (Operating a Motor Vehicle Impaired). Whitecuff was also sentenced to serve nine days in a drunk driving intervention program which proves that his breath analysis test showed that he was under the influence of alcohol.

**ARGUMENT 2-** Brad Whitecuff went against the laws that he consented to when obtaining his driver's license. According to the OHIO BMV, "In Ohio, it is illegal to operate a motor vehicle while under the influence of alcohol and/or drugs. Even legally prescribed or over-the-counter medication may affect an individual's driving ability." Whitecuff obviously understood this law, as he had passed both a permit test and driver's test. It is a state law that no person should be under the influence of alcohol while driving, due to the studied fact that alcohol impairs thinking and reasoning, reduces muscle coordination, and minimizes the function of the brain. Whitecuff was "weaving all over the road," which gives evidence that his muscle coordination was reduced. There was a witness that saw Whitecuff's reckless driving, which called him in. Instead of the court calling in both Officer Hansel and the witness they only called in Officer Hansel. This was an error by the court, because the witness could have given further evidence to back up the arrest of Whitecuff.

**ARGUMENT 3-** According to the STATEMENT OF FACTS, “The court of appeals reversed the trial court's decision, holding that the city had failed to meet its burden of proving that the dispatcher had reasonable suspicion to issue the dispatch and as such Officer Hansel did not have the requisite reasonable suspicion to perform an investigative stop. As part of its rationale, the court of appeals concluded that the city’s failure to offer the testimony of either the dispatcher or the “anonymous” citizen caller during the suppression hearing rendered its evidence insufficient. The court of appeals did not consider Officer Hansel’s testimony about the facts relayed from the caller to the dispatcher.” Although Officer Hansel did not directly see Whitecuffs reckless driving he assessed the situation in an appropriate manner, checking to see if Whitecuff was under the influence. After he approached Whitecuff, the decision was correct to arrest Whitecuff. If Officer Hansel would not have approached Whitecuff, serious accidents could have followed due to his impaired abilities. According to *Gregory S. Young*, In 2015, there were 1,111 automobile deaths in Ohio alone, which had been an all time high for the past 3 years. Law Enforcement began to become more strict on watching for drivers under the influence. If Officer Hansel had not done his job, which included keeping those on the road safe, multiple people could have been injured or died. If Whitecuff would have violated Whitecuffs fourth amendment rights, there would have been reason to dismiss the case. Although Whitecuff had both reason and probable cause to pull over Whitecuff, because of the tip call that he had received.

**CONCLUSION-** In closing the court case it was erred by not considering Officer Hansel's testimony about the facts relayed from the caller to the dispatcher. Even though Officer Hansel was correct in his judgment, Brad Whitecuff went against the law. Officer Hansel only did his job and did not violate any of Whitecuffs rights or any state laws. Whitecuff had no right to file a motion to suppress evidence due to the fact that he broke the law. Officer Hansel should have been allowed to consider the tip call as a source of information, and tip calls should be used as evidence in further cases.

Respectfully Submitted,

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Zoie Ervin

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Sophie Williams  
Attorneys for the Appellant

# OHIO YOUTH IN GOVERNMENT 2024

## CASE #2



Taft v The State of Ohio

**THE MODEL SUPREME COURT OF THE STATE OF OHIO**

Sean Talt

vs.

The State of Ohio

Prosecution (Appellant)

Defendant (Appellee)

Jake Malloy

Armaan Chaudhary

Attorney for the Appellant

Attorney for the Appellee

## STATEMENT OF FACTS

Sean Talt married Jean Smith in 1989. They had two children. They subsequently divorced. In 1991 Talt married Veronica Mars. They were divorced in 1995. The Domestic Relations Court of Medina County, Ohio ordered Sean to pay to Jean the amount of \$340.52 per child per month. The Medina County Domestic Relations Court ordered Sean to pay to Veronica the amount of \$175.48 per month.

Sean fathered two more children with Samantha Sart in 1995 and 1997. Sean and Samantha were not married. Sean and Samantha broke up shortly after the birth of their second child. Samantha sought a child support order from Medina County Juvenile Court. The court granted Samantha child support in the amount of \$153.52 per child per month.

Initially Sean remained current on all of his child support orders. He suffered some financial reverses in 2000 and became delinquent on his monthly child support payments. Sean was often cited to court for his failure to pay support. On February 27, 2002, the Medina County Grand Jury indicted Sean for two counts of non-support in violation of R.C. 2919.21(A)(2) or (B), a fifth degree felony.

Sean Talt initially pleaded not guilty at his arraignment. He subsequently changed his plea to no-contest. The court accepted the no-contest plea and found him guilty of two charges of non-support in violation of R.C. 2919.21(B). Prior to sentencing, the trial court ordered each party to brief whether or not the court could lawfully order that as a condition of probation, the defendant may not impregnate a woman while under the supervision of Adult Probation.

The American Civil Liberties Union asked permission to file an amicus curiae brief. The trial court granted leave. Counsel for the parties and the ACLU filed briefs on the constitutionality of an anti procreation statute.

On September 6, 2002, the trial court sentenced Talt to community control for five years. Talt was to be under the general supervision and control of the Adult Probation Department. As a condition of that community control, the trial court ordered Talt to "make all reasonable efforts to avoid conceiving another child." The court additionally stated, "What those efforts are are up to Talt, that is not fair to me to say; I am not mandating what he does, only that he has to make reasonable efforts to do so."

Talt appealed the anti-procreation portion of his sentence to the Ninth District Court of Appeals. He claimed the provision violated his fundamental right to procreate under the Ohio and United States Constitutions. The Court of Appeals concluded the reasonableness test of *State v. Jones*, 49 Ohio St.3d 52, rather than a heightened level of scrutiny that traditionally applies in cases where a fundamental right is implicated, governed the validity of the community controlled sanction. Using this standard the court of appeals held the anti-procreation was constitutional. The court of appeals held that the condition was

reasonably related to the three objectives underlying the probation statute: the rehabilitation of the defendant; the administration of justice; and the prevention of future criminality. The judgment of the trial court was affirmed. Talt appealed to the Ohio Supreme Court, claiming the anti-procreation condition was unconstitutional. Issue: is the anti-procreation condition unconstitutional?



## Appellant Brief

### ASSIGNMENTS OF ERROR

There was an error in the appellate court in the following particulars:

1. The court erred in not finding the condition ordered to Mr. Talt overbroad under the rule that a condition “cannot be overly broad so as to unnecessarily impinge upon the probationer’s liberty”.
2. The court erred in determining that Mr. Talt’s probation condition is reasonably related to the “interests of doing justice, rehabilitating the offer, and insuring good behavior.”

### ARGUMENT

Argument #1: The court erred in not finding the condition ordered to Mr. Talt overbroad under the rule that a condition “cannot be overly broad so as to unnecessarily impinge upon the probationer’s liberty”.

The court should have found that the condition given to Mr. Talt to “make all reasonable efforts to avoid conceiving a child” during his five-year probationary period is overbroad and unnecessarily impinges on Mr. Talt’s liberty.

Undoubtedly, a right to procreate is a fundamental right protected under the United States Constitution. *Skinner v. Oklahoma*. Criminals serving a prison sentence have diminished liberty, however. A trial court can impose community-control sanctions that limit fundamental rights, as long as these limitations further the statutory goals of community control and are not overbroad. *State v. Chapman*.

The court introduced an overly broad condition. It ordered Mr. Talt make “all reasonable efforts to avoid conceiving another child during his five-year probationary period.” In *Jones*, a strictly nonconstitutional challenge was imposed, because the Constitution does not govern a right to speech or association for illegal purposes.

Additionally, *Jones* stated the condition must be reasonably related to the statutory ends of probation and must not be overbroad. Mr. Talt was given no opportunity to have the antiprocreation condition lifted if he were to become current on his child-support payments.

The condition imposed implicates a fundamental right in an overly broad setting without a lifting mechanism. Therefore, it is unconstitutional.

Argument #2 The court erred in determining that Mr. Talt’s probation condition is reasonably related to the “interests of doing justice, rehabilitating the offender, and insuring good behavior.”

The condition that the court imposed on Mr. Talt—to “make all reasonable efforts to avoid conceiving another child”—is not reasonably related to the “interests of doing justice, rehabilitating the offender, and insuring his good behavior.” *Jones*.

In *Jones*, the Ohio Supreme Court set forth a three-part test in determining whether a condition of probation is unreasonable: “In determining whether a condition of probation is related to the ‘interests of doing justice, rehabilitating the offender, and insuring his good behavior,’ courts should consider whether the condition (1) is reasonably related to rehabilitating the offender, (2) has some relationship to the crime of which the offender was convicted, and (3) relates to conduct which is criminal or reasonably related to future criminality and serves the statutory ends of probation.” *Jones*, 49 Ohio St.3d at 53, 550 N.E.2d 469. The antiprocreation condition given to Mr. Talt fails all three levels of the *Jones* test.

First, the probation condition that Mr. Talt avoid conceiving another child is not reasonably related to rehabilitating him. Mr. Talt’s nonsupport offense involves a failure to pay support under a court order, not conceiving children. To avoid conceiving a child is not aimed at rehabilitating Mr. Talt. It is a punishment, pure and simple. His rehabilitation would be best

found in a condition mandating that he undergo job and financial training or that he restrict his spending. All of these would be reasonably related to rehabilitating Mr. Talt. Because the crime of nonsupport depends on a person's ability to pay, a community-control condition requiring Mr. Talt to make "all reasonable efforts" to avoid conceiving another child is not reasonably related to rehabilitation. Therefore, the procreation prohibition is not reasonably related to rehabilitating Mr. Talt.

Second, the crime of nonsupport does not have any relationship to the crime of which Mr. Talt was convicted. The crime committed by Mr. Talt is that of nonsupport of dependents. R.C. 2919.21(B) makes it a crime to fail to pay support as required by a court. However, a failure to pay the entirety of the support amount is excused if the individual can show that he "provide[d] the support that was within [his] ability and means." R.C. 2919.21(D). While Mr. Talt's obligation to pay may increase with more children, his ability to pay remains separate. The criminal act is his failure to pay under a court order as his means and ability allow, not the number of children that he has fathered. Mr. Talt's criminal conduct was not fathering children; it was his inability to pay court-ordered his support. Thus, the procreation condition does not have any relationship to the crime.

Third, the probationary condition given to Mr. Talt is not "related to conduct which is criminal or reasonably related to future criminality," and it does not serve the statutory ends of probation. "There is no question fathering another child would increase [Mr. Talt's] support obligations to his dependents, but it would have little effect on preventing the criminal conduct given in the statute" *Chapman v. State*. The statute defines the criminal conduct as follows: "No person shall abandon, or fail to provide adequate support to ... (2) The person's child who is under age eighteen." R.C.2919.21(A)(2). If Mr. Talt's means and ability allow him only to pay

\$2,000 a month to his dependents and he does so, he will comply with the statute. Additionally, having another child does not necessarily mean Mr. Talt will then be under court order to pay for the support of this child, and he may instead support this child with his own means without a court order. Using the analogy given in *State vs. Chapman*, his means and ability will not change if he has 7 children or 77. For these reasons, the condition does not relate to conduct that is criminal or relate to future criminality.

The condition that the court imposed on Mr. Talt—to “make all reasonable efforts to avoid conceiving another child”—is not reasonably related to the “interests of doing justice, rehabilitating the offender, and insuring his good behavior.” Consequently, this court should reverse the decision below and hold that the antiprocreation condition is invalid under the test given in *State vs. Jones*.

Jake Malloy  
Attorney for the Appellant

## APPELLEE'S BRIEF

### **ARGUMENTS**

#### **Argument #1 – The antiprocreation condition is not a fundamental right under the reasonableness test.**

Ohio Rev. Code Ann. § 2929.15(A)(1) governs the authority of an Ohio trial court to impose conditions of community control. This section provides that when sentencing an offender for a felony, the trial court may impose one or more community sanctions, including residential, nonresidential, and financial sanctions, and any other conditions that it considers “appropriate.” The general assembly has thus granted broad discretion to trial courts in imposing community-control sanctions. The antiprocreation condition is appropriate because the Court of Appeals concluded that with the reasonableness test of *State v Jones*, 49 Ohio St.3d 52, the court is able to establish reasonable community sanctions. According to the majority opinion of *State v Jones*, “In the interests of doing justice, rehabilitating the offender, and ensuring his good behavior, the court may impose additional requirements on the offender.”

As clarified in the Medina County Court of Common Pleas, conceiving a child is not a fundamental right and the antiprocreation clause is constitutional. According to *Dobbs v Jackson Women’s Health Organization*, “the Constitution does not prohibit the states from regulating or prohibiting abortion.” The Appellee argues that the court did have authority to limit Mr. Talt’s ability to conceive a child because of the three prong test described in *State v Jones*. The condition is reasonably related to rehabilitating the offender as Sean Talt will be encouraged to spend time with and pay the child support orders of his current children. The condition has a reasonable relationship to the crime of which Talt was convicted by the nature of the crime itself. Sean Talt should not be able to have another child, if he has failed not once, but twice to pay for his child support orders. Finally, the condition reasonably relates to future criminality and serves the statutory ends of prohibition by protecting the financial livelihood of future mothers and children.

#### **Argument #2 – If Appellant argues antiprocreation condition is fundamental, there is compelling interest to save an unborn child from future financial hardship.**

According to the American Psychological Association, the probability of a first marriage ending in divorce within the first 10 years is approximately 33% in 2023. In 2020–2022 data with the KIDS COUNT® Data Center, just 23% of U.S. female-headed families reported receiving any amount of child support. If Sean Talt demonstrated the traits of a good boyfriend, husband and father, we would not be gathered here today. The livelihoods of Jean Smith, Veronica Mars, Samantha Sart, and the 4 unnamed children were damaged by the carelessness of Sean Talt.

The Appellee argues that the State of Ohio has compelling interest in saving the lives of any unborn children and preventing future criminality for Sean Talt. The Appellee further argues that based on Talt’s history of non support charges, it is not a matter of if, but when Talt will conceive

a new child and leave soon after. How many more families will he financially impair through his irresponsibility when creating life?

Argument #3 – The antiprocreation clause is protected within the Constitution by the equal protection clause of the 14th amendment.

The 14th amendment of the Constitution states, “No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law.” Although the Appellant may make an argument in favor of Talt with the 14th amendment, the phrasing of the amendment supports the State of Ohio in their decision to add the antiprocreation clause. As Sean Talt has received due process of law with the marriages of Jean Smith in 1989 and Veronica Mars in 1991, he has also received due process with the divorces of both of these women. Throughout all three of his relationships, Sean Talt has received due process of law and allows for the State of Ohio to include the antiprocreation condition to his community control probation.

The Appellant argues that the people who have truly not received due process rights are the single mothers and children who have been financially damaged by Talt’s nonsupport orders. Without sufficient financial support, Talt has taken away the right to child support designated to Jean Smith, Veronica Mars, and Samanta Sart.

## CONCLUSION:

In summary, the antiprocreation condition is constitutional. As conceiving a child is not a fundamental right, the facts show that Sean Talt was irresponsible in his nonsupport orders and must serve his five year probation with the condition deemed appropriate by the State of Ohio. To rehabilitate the offender, demonstrate a relationship between the condition and crime, and prevent future criminality, the antiprocreation condition passes the reasonableness test of *State v Jones*. As stated with *Dobbs v Jackson Women's Health Organization*, the Constitution does not prohibit the regulations of abortion or other reproductive rights. If the antiprocreation condition is deemed as a fundamental right, the State of Ohio has compelling interest to prevent the future criminality of Sean Talt and save the livelihoods of future mothers or unborn children from poverty or financial hardship. Finally, because Sean Talt has received due process of law with two marriages and two divorces, the 14th amendment of the Constitution defends the State of Ohio with their decision to include the antiprocreation condition to the community control prohibition of Sean Talt. The decision of the Ninth District Court of Appeals should be affirmed.

Respectfully submitted,

Armaan Chaudhary

Attorney of the Appellee





# OHIO YOUTH IN GOVERNMENT 2024

## CASE #3



State of Ohio v. Green

**THE MODEL SUPREME COURT OF THE STATE OF OHIO**

State  
Persecution (Appellee)

vs.

Green  
Defendant (Appellant)

Ryan Lefever  
Drew Neff  
Attorneys for the Appellee

Cj Crabtree  
Jacob Allen  
Attorneys for the Appellant

## STATEMENT OF FACTS

Appellant Charles Green appeals from his conviction following a jury verdict of child endangerment of his son on several counts in violation of Ohio R.C. 2919.22. The case arose out of a father's whipping of his ten-year old son for failing to tell him about a detention at school.

On March 6, 2017, the defendant was concerned when his ten-year old child, Nathaniel Green, did not come home after school, which let out at 3:00 pm. Appellant went to his son's local Jacksonville public school. Appellant approached the school's principal and was notified that his son was in detention. Appellant demanded to know why he was not notified and was told by the principal that his son should have brought a notice of the detention home. Appellant went to search his son's school desk to determine if he had received the notice but had decided not to show it to his father. On the way to his son's classroom, appellant saw his son exiting the detention room, Appellant ordered his son to "come here," and the appellant then flipped his arm out and hit his son in the chest. He said, "Let's go" and led his son out of the school and to the family car.

Both the father and son testified that, upon entering the car, appellant verbally chastised his son for his conduct. In response, the child pulled down his ski mask so as to hide his face from his father. The appellant moved to pull up his son's ski mask, and hit his son in the left eye. This caused the eyelid to develop a bruise.

Upon returning home, appellant disciplined his son by using corporal punishment on his buttocks and legs with a belt. The son moved his arms and hands to his rear end to deflect the punishment and the belt hit his arm and hands. However, the boy testified that his swollen hand, which was examined by a doctor the next day, was

caused by a skateboarding accident, which occurred prior to the corporal punishment administered by his father.

When the appellant's son went to school the next day, the principal noticed that the boy had a black eye and a swollen left hand. She called for the school nurse who observed welts left by the appellant's corporal punishment which occurred the day before.

The principal suspected child abuse and called Social Services. Nancy Gray, a social worker, arrived at the school at 3:00 pm and transported the boy to children's services. Once again, appellant went to the school when his son did not return home from school on time. He was told his son had been removed from school by children's services.

Appellant drove to the agency to recover his son. However, he was informed that his son would be held in custody by the agency until an investigation could be completed. After the appellant left the agency, the boy was treated at University Hospital.

At University Hospital, Dr. Margaret Gallow, MD, examined the boy. The doctor testified there were bruises and swelling on his buttocks and legs. She stated that the sides of his arms and backs of his hands were swollen and bruised. He also had a few open cuts on his right buttock area. She also noted that he had older bruises that he told her were from prior punishments from his father. She also stated that there was a scrape of indefinite origin and age on the boy's chest. The doctor also stated that regarding the boy's swollen left hand, she had not seen skateboarding injuries like that before, and admitted that she did not ask the boy how he received this injury.

The doctor stated that the black eye was consistent with being struck with a

fist. She did not know whether being struck with a finger could cause the same bruising. The doctor found no evidence of new or old fractures and immediately released Nathaniel Green without prescribing any medication or dressing any of his bruises. No subsequent appointment was scheduled.

The son was released to Mrs. Darlington, as a representative of the agency, and she proceeded to place him in a foster care home as she believed, due to the extensive nature of the bruises, Nathaniel would be at risk if left with his father.

Prior to commencement of the trial, Edward Becker, a clinical social worker at the Juvenile Court Psychiatric Clinic, interviewed Nathaniel Green. Becker testified that in a confidential interview, the appellant's son verified that the black eye he sustained on March 23, 2010, was caused by his father's removal of his ski mask. He also testified that Nathaniel was hesitant when he first saw his dad, but relaxed quite a bit as the interview progressed.

Samuel Selekman, a child abuse specialist, also interviewed the appellant and his son. Selekman stated that Nathaniel Green did not fear living with his father, and that the boy was playful and loving with his father during the interview. Furthermore, the boy told Selekman that his hands were injured by a skateboard accident, which occurred prior to the corporal punishment his father administered to him. Selekman also admitted that although the pictures showed "serious" injury, they did not clearly show the child was excessively punished. He stated that other circumstances must be considered. He had not seen the pictures before trial and stated they were "upsetting."

A jury trial was commenced on April 7, 2017 and returned a verdict of guilty against the appellant two days later. Appellant now seeks an appeal with the Ohio Supreme Court.

## Appellant's Brief

### Assignment of Errors

- 1).Nathaniel was comfortable around his dad and did not show fear of his father.
- 2).Images did not clearly show that Nathaniel was excessively punished.
- 3).The Appellant used regular punishment on his child.

### Arguments:

**Argument 1-** Samuel Selekman, a child abuse specialist, interviewed both the appellant and his son. In the Statement of Facts, it is stated that, "Selekman stated that Nathaniel Green did not fear living with his father, and that the boy was playful and loving with his father during the interview". There was no reason for the appellants son to be taken if there is no sign of stress or fear of the father to the child.

**Argument 2-** There was not enough evidence to come to the conclusion of Charles Green as guilty. Ohio revised code Section 2901.05 clearly states that "Every person accused of an offense is presumed innocent until proven guilty beyond a reasonable doubt, and the burden of proof for all elements of the offense is upon the prosecution." The Child Abuse Specialist, Samuel Selekman, admitted that the images did not clearly show that Nathaniel Green was abused or excessively punished. If there isn't sufficient evidence of abuse, then Charles Green should not have been concluded as guilty.

**Argument 3-** Charles Green did not abuse his son. The Ohio revised code section 2919.22 states, "Repeatedly administer unwarranted disciplinary measures to the child, when there is a substantial risk that such conduct, if continued, will seriously impair or retard the child's mental health or development;" The appellant was simply disciplining his child after the child had failed to tell his father he had received detention. Punishing your child after they get in trouble is a very typical thing for a parent, or parents to do.

**Conclusion:** Appellant Charles Green should not have been deemed guilty. His son showed no fear of living with the appellant. There was not enough evidence to conclude that he was guilty. The appellant was disciplining his child as most parents would in that situation. Appellant Charles Green was wrongfully concluded as guilty.

Respectfully submitted,

Jacob Allen  
Cj Crabtree

Attorneys for the Appellant

# Appellee's Brief

## ARGUMENTS

### Argument #1 - The appellant abused his son Nathaniel Green.

Based on the evidence presented, Nathaniel Green was abused by his father on multiple accounts. One of these incidents being when Nathaniel entered the car and sat down, he was punched in the eye by his father causing his eyelid to develop a bruise. The doctor supported this by stating the black eye was caused by the eye being consistently struck by a fist. Another incident in which Nathaniel was abused by his father is when his father flipped his arm out and struck Nathaniel in the chest. Ohio Crim. R. 2919.22 (B)(1) states that no person shall abuse a child under the age of 18.

### Argument #2 - The appellant illegally used corporal punishment to discipline his son.

On March 6th, 2017, the appellant, in order to discipline his son, resorted to corporal punishment. According to Ohio Crim R. 2919.22 (B)(3), no person shall administer corporal punishment or other physical disciplinary measure, or physically restrain the child in a cruel manner or for a prolonged period, which punishment, discipline, or restraint is excessive under the circumstances and creates a substantial risk of serious physical harm to the child. Indisputably, the appellant repeatedly hit his son on his buttocks, legs, arms, and hands upon their return home after Nathaniel was released from detention. This was a reaction to the son receiving detention and hiding it from his father. Additionally, Dr. Margaret Gallow's testimony stated that there were bruises and swelling on Nathaniel Green's buttocks, legs, arms, and hands. She also testified that there were open cuts on his right buttock area.

Argument #3 - The appellant has a history of consistent and unnecessary

When the appellants son was taken to the university hospital, Dr. Margaret Gallow, MD, examined Nathaniel and it was shown that there were pre-existing bruises and scars. Ohio Crim 2919.22 (B)(4) states no person shall repeatedly administer unwarranted disciplinary measures to the child, when there is a substantial risk that such conduct, if continued, will seriously impair or retard the child's mental health or development.

Conclusion:

The court made the right decision in denying the appellant's motion for acquittal to the charge of endangering the child. The appellant had no right to abuse the child or enforce corporal punishment. The appellant should be punished for the actions he made on March 6, 2017.

Respectfully submitted,

Ryan Lefever

Drew Neff

Attorneys for the Appellee



# OHIO YOUTH IN GOVERNMENT 2024

## CASE #4



Smith and Jones v Chandler

**THE MODEL SUPREME COURT OF THE STATE OF OHIO**

Officers Smith and Jones  
Prosecution (Appellant)

Vs.

Mr. Chandler  
Defendant (Appellee)

Rowyn Hubbard  
Attorney for the Appellant

Izzy Shihab  
Attorney for the Appellee

## STATEMENT OF FACTS

The Apellee, Jeffrey L. Chandler (Mr. Chandler), is a well-known criminal defense attorney. He frequently defends accused people in high-profile criminal cases. On the evening of May 22, 2013, Mr. Chandler and his wife hosted an outdoor party at their home for friends and family to celebrate their daughter's admission to Harvard. The party began at 7:00 p.m. They served finger foods. They also served beer and wine for adults and sodas for underage guests. All beverages were served from ice tubs. Mr. and Mrs. Chandler recruited a family friend to monitor the tubs and ensure that no underage guests consumed alcoholic beverages. Mr. and Mrs. Chandler also hired a local musical group to perform during the evening. The three-person band played amplified guitars and keyboard from 7:15 p.m. to 10:00 p.m. with fifteen minute breaks at 8:00 p.m. and 9:00 p.m. Mr. Chandler instructed the band to stop playing promptly at 10:00 p.m. to comply with the city noise ordinance.

At approximately 10:05 p.m., the city police dispatcher received a complaint about a loud party in the vicinity of the Chandlers' home. The police dispatcher received a similar complaint five minutes later. At 10:30 p.m. the police dispatcher referred the complaints to the city police officers M. L. Jones (Officer Jones) and M. G. Smith (Officer Smith). Officer Jones and Smith arrived at the Chandlers' home at 10:40 p.m.

The road leading to the Chandlers' driveway is marked "private road" with two speed bumps. When Officer Jones and Smith reached the "private road", they rolled down their windows to determine if any noise could be detected. There was none; however, the officers could hear several people talking loudly from a distance. Officer Smith drove up the private road and pulled his marked police car into the Chandlers' driveway in front of their house. (Officer Smith and Officer Jones both testified later that they knew they were entering the Chandlers' private property when they pulled into his circular driveway.)

Mr. Chandler walked across his lawn holding a bottle of beer as Officers Smith and Jones approached in their police car. When Mr. Chandler saw the police car pull into his driveway, he approached still carrying the bottle of beer. He met Officers Smith and Jones on his lawn just as they got out of their car. Mr. Chandler identified himself as the owner of the property and asked if there was a problem. Officer Smith informed Mr. Chandler that they had received two complaints about loud noise and music in the area. Mr. Chandler explained that any music or noise had been curtailed promptly at 10:00 p.m. and no further noise problem existed. Then, he asked the officers to leave.

Officer Smith believed that he smelled alcohol fumes on Mr. Chandler's breath and asked to speak to someone "who was sober" regarding the noise complaint. (Mr. Chandler later

testified that he consumed two bottles of beer between 8:00 p.m. and 10:00 p.m. and had only taken a sip of the beer he was holding during his discussion with Officers Smith and Jones.) Officer Smith also told Mr. Chandler he intended to search the premises. Mr. Chandler refused the officers access to his home, asking whether they had a search warrant or probable cause for the search. Officer Smith explained that they did not need a search warrant because Mr. Chandler was drinking in public and appeared to be intoxicated. Mr. Chandler refused the officers access to his home again and asked them to leave.

During this discussion, Officers Smith and Jones observed several people appearing to be underage walking through the Chandlers' yard and into their house. Two of these people were carrying bottles. None were loud or unruly while in the officers' presence. Mr. Chandler became loud and animated during the discussion and threatened to "see the officers in court". After five minutes of discussion, Officers Smith and Jones arrested Mr. Chandler for public intoxication and obstruction of an officer. They handcuffed Mr. Chandler, placed him in their police car, and, without conducting any further investigation, took him to the police station where they placed him in a cell to await arraignment at 11:30 p.m. Officers Smith and Jones did not conduct any field sobriety tests or other intoxication tests after arresting Mr. Chandler. Mr. Chandler was arraigned at 8:00 p.m. on May 23, 2013, and released. He charges against Mr. Chandler were dropped two months later.

Mr. Chandler filed a civil suit against Officer Smith and Jones on March 1, 2024, pursuant to 42 U.S.C.A. § 1983 alleging that the officers violated his Fourth Amendment right against unreasonable searches and seizures. (42 U.S.C.A. § 1983 creates a civil cause of action, or rights to sue, for violations of constitutional rights.) Mr. Chandler also alleged that the officers falsely arrested him, unreasonably assaulted him, falsely imprisoned him, and maliciously prosecuted him. Officers Smith and Jones denied Mr. Chandler's allegations. They also asked the Circuit Court to dismiss Mr. Chandler's lawsuit because, as police officers, they were entitled to "qualified immunity" as a matter of law. ("Qualified immunity" is a defense allowed under 42 U.S.C.A. § 1983.) The officers filed a "motion for summary judgment" to assert this qualified immunity defense. (A court may grant summary judgment when there are no disputed facts and the law clearly requires a ruling in one party's favor.) Qualified immunity protects public officers from any civil law suits and any civil liability for money damages where they act within their authority. The Circuit Court denied the officers' claim to "qualified immunity" and allowed Mr. Chandler's case against the officers to proceed to trial. Officers Smith and Jones filed this appeal before their trial to have the Supreme Court of Ohio determine whether the Circuit Court correctly denied them qualified immunity. (An appeal before a trial is unusual. It is called an "interlocutory appeal." Usually, one must wait until the trial is completed to appeal any adverse rulings by a court. Officers Smith and Jones were entitled to an interlocutory appeal in this case because their qualified immunity protects them from being sued as well as from any liability for money damages.)

## **ASSIGNMENT OF ERRORS**

There was an error in the Circuit Court in the following particulars:

- A) The Circuit Court erred in denying qualified immunity to Officers Smith and Jones.
- B) The Circuit Court erred in denying Officers Smith and Jones' motion for summary judgment.

## **ARGUMENTS**

### **Argument #1 The Circuit Court erred in denying qualified immunity to officers Smith and Jones.**

Qualified immunity is a valid and well-established defense under 42 U.S.C.A. § 1983, meaning, it is a valid defense in this particular where Mr. Chandler believes his fourth amendment right against unreasonable search and seizure was violated (as his suit is pursuant to 42 U.S.C.A. § 1983, where there are—in this case—rights to sue for violations of constitutional law.) A public officer's duty is to uphold to law of the land, including the constitution. When their societal role and duty are brought into question, one must remember that they are using the qualifications that got them their position (i.e. training, education, etc.) to inform their actions. Everything they do is done to enact the law and protect and serve.

### **Argument #2 The Circuit Court erred in denying Officers Smith and Jones' motion for summary judgment.**

Summary judgment is granted by a court when there are no disputes over factual information, and the law clearly requires a ruling in one party's favor. In this particular case, no facts were held in dispute by any parties. Additionally in this particular case, the law does indeed require a ruling in Officers Smith and Jones' favor, as they did not violate Mr. Chandler's fourth amendment rights to unreasonable search and seizure without probable cause. The cursory search that was conducted was due to the probable cause received by Officers Smith and Jones approximately twenty-five (25) minutes after their relation to the police dispatcher. These are, of course, the two (2) calls of complaint brought against Mr. Chandler's party on his property. In addition to these initial calls, a group of people were seen, among them two (2) potential juveniles holding what appeared to be bottles containing what could be alcohol. All of this information gathered on site by Officers Smith and Jones, combined with the multiple calls of complaint relayed to them by police dispatch, surmounts to being probable cause for the actions taken by Officers Smith and Jones on that night of May 22, 2013.

## **CONCLUSION**

Officers Smith and Jones were acting entirely within their authority as police officers of Ohio. Based on the probable cause both relayed to them from dispatch and observed on site, no fourth amendment right to unreasonable search and seizure without probable cause was violated. Additionally, due to the nature of Mr. Chandler's suit being pursuant to 42 U.S.C.A. § 1983, qualified immunity is deserved by Officers Smith and Jones, as they were acting within the scope of their authority and doing their duty as police officers.

For the aforementioned reasons, the decision of the Circuit Court should be overturned.

Respectfully submitted,

Rowyn Hubbard

Attorney for the Appellant

## **Issues for the entire case**

There are three propositions before the court. First, the infringement of Mr. Chandler's 4th amendment rights, second the applicability of qualified immunity and third, the decision of summary judgment confirming that the circuit courts decision should be upheld

### Argument 1

#### **Issue**

The first issue before this court is whether Officers Jones and Smith violated Mr. Chandler's 4th amendment rights of unreasonable search and seizure by arresting him on his private property without a warrant or probable cause.

#### **Rules**

The Applicable law in this case is the 4th Amendment. The 4<sup>th</sup> Amendment states that “The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched and the persons or things to be seized.”

According to Black Laws Dictionary exigent circumstances are: “A situation in which a police officer must take immediate action to effectively make an arrest, search, or seizure for which probable cause exists, and thus may do so without first obtaining a warrant”.

#### **Application**

Smith and Jones violated Mr. Chandler's fourth amendment right of unreasonable search and seizure. When the officers arrived in front of Mr. Chandler's private road, they heard no noise other than people talking loudly in the distance. It is important to note that talking is not a noise problem; it is a right to freedom of speech. If the officers claimed that yelling was heard from Mr. Chandler's property that would be different. After hearing no noise, the officers continued to drive onto Mr. Chandler's clearly marked “private road” and made their way to the driveway of Mr. Chandler's property, they were no better than trespassers as they had no probable cause to be on his property.

Even if Officers Smith and Jones had probable cause to be on Mr. Chandler's property, there was no probable cause to arrest Mr. Chandler or to attempt to search his property. Both officers had testified that they knew they had entered Mr. Chandler's private property when they pulled into a large circular driveway. When Mr. Chandler came out to greet them, holding a bottle of beer, The officers claimed he was publicly intoxicated. Mr. Chandler could not be publicly intoxicated because he was on his property. When Mr. Chandler asked the officers to leave since they had no right to be on the premises, they attempted to search the house, claiming that they were allowed to do so, given that Mr. Chandler was publicly intoxicated. When Mr. Chandler tried to argue his rights, the officers arrested him for public intoxication and obstruction of a police officer.

There was a case on point in 2008. In State v. Andrews, The court determined that Andrews was falsely arrested at her home and was unreasonable searched. The police were dispatched due to a noise complaint. It was determined that there was no noise at the house when the police arrived, but there was a fear of underage drinking by evidence of red solo cups on the front lawn. The officers then looked through the house windows and saw approximately 20

teenagers drinking from beer cans and red solo cups. The police arrested Andrews for obstruction of officer because she did not allow them onto her property, which they promptly disregarded. The court determined in State v. Andrew that the police officers had violated her 4th Amendment rights by entering her property without consent and falsely arresting her. The decision was made for three reasons. First, there was no exigent circumstance- (meaning no dangerous circumstances occurred that forced an arrest) that prompted a warrantless search and seizure since the crime of underage drinking was a misdemeanor offense, and the property was secured. Second, The officers had failed to ask if any of the minors' parents were at the house since, according to Ohio revised code 4301.69, Minors can drink in a guardian's presence. Third, There was no evidence of anyone in the home being put in danger.

State v. Andrews sets a precedent for the case before us. Similar to this case, there was no noise at the property during the police arrival. The officers had failed to determine if any minors' guardians or parents were on the property. No exigent circumstances had occurred in either case. the officers failed to determine if any minors were drinking, as no further testing had been conducted.

## Argument 2

### **Issue**

The second issue is whether the qualified immunity defense is not applicable because Officer Smith and Jones acted outside their authority by falsely arresting Mr. Chandler, unreasonably assaulting him, and maliciously prosecuting him.

### **Rules**

The applicable rule in this case is qualified immunity which is: "a type of legal immunity that protects a government official from lawsuits alleging that the official violated a plaintiff's rights, only allowing suits where officials violated a "clearly established" statutory or constitutional right."

The ability to use qualified immunity rests upon two factors: "(1) whether the facts alleged by the plaintiff amount to a constitutional violation, and (2) if so, whether the constitutional right was "clearly established" at the time of the misconduct."

According to the case that acts as a precedent "clearly established" means: any reasonable officer should have known the action is unconstitutional

### **Application**

In the United States Supreme Court case of Taylor v. Riojas, Taylor, an inmate at a Texas prison, was held in unconstitutional conditions. The cell he was forced to stay in was lined with human feces. It was noted that the faucet was also stuffed with feces. This led Taylor not to drink water for several days from fear of contamination. In another cell, Taylor was placed in his only form of a restroom was a clogged drain in the cell, leading to an overflow of human products. He argued that his 8th Amendment right of cruel and unusual punishment had been violated by staying in such unsanitary conditions. The officers moved for qualified immunity and summary of judgment on this case. Qualified immunity was not given since the court decided that any



reasonable officer would have known that Taylor's confinement was against the Constitution since the violations of the officers were so obvious.

Similar to Taylor v. Roisas, the violations by the appellant are blatantly clear. When Officer Smith and Jones drove onto Mr. Chandler's private property without probable cause, they became trespassers. Even if they had probable cause to be on the property, their arrest violated Mr. Chandler's 4<sup>th</sup> amendment right of unreasonable search and seizure. Mr. Chandler was arrested for public intoxication and obstruction of a police officer. To be arrested for public intoxication means that Mr. Chandler must have been drinking off his private property. Mr. Chandler was on his front lawn. The police have already testified that they knew they had been on Mr. Chandler's private property. Any reasonable officer would have known that they could not arrest Mr. Chandler for public intoxication. Public intoxication is the act of being visibly under the influence in public. Furthermore, they used the public intoxication defense as a means to try and search Mr. Chandler's property. Mr. Chandler, aware of his rights, would not let them. Mr. Chandler was then arrested on both counts.

Both officers were fully aware that they violated Mr. Chandler's 4<sup>th</sup> amendment right of unreasonable search and seizure by their arrest of Mr. Chandler for public intoxication despite knowing they were on his private property and their use of this faulty defense to arrest Mr. Chandler in an attempt to search his house.

Police officers have a difficult job, and that's the reason the law has given them immunity from being sued. They are given this immunity as long as they act within the scope of their duties. On the other hand, because police officers have such authority in order to protect the rights of the citizens that, immunity is limited. When the police officers arrived on Mr. Chandler's private property and arrested him without a warrant or probable cause, they violated Mr. Chandler's constitutional rights. If the law provided immunity protection for arresting an individual on his private property without reason, no citizen could be safe. Ohio would become a police state if this was to occur. Officers must be held accountable when they violate a citizen's constitutional rights; qualified immunity is not absolute immunity.

### Argument 3

#### **Issue**

The third issue is whether or not, assuming that all the facts are in favor of the plaintiff, the circuit court correctly decided to deny officers Jones and Smith's motion for summary judgment.

#### **Rules**

The applicable rule in this issue is Summary Judgement. Summary Judgement is "a civil court ruling in favor of one party over the other without a full trial."

According to Ohio Rules of Civil Procedure 56, "A summary judgment shall not be rendered unless it appears from the evidence or stipulation, and only from the evidence or stipulation, that reasonable minds can come to, but one conclusion and that conclusion is adverse to the party against whom the motion for summary judgment is made, that party being entitled to have the evidence or stipulation construed most strongly in the party's favor."

## **Application**

The evidence provided by the non-moving party is: that the officers received two noise complaints at 10:05 and 10:10. When the officers arrived before the private road leading to the house, they heard no noise. Despite hearing no noise, the officers decided to trespass and drive through the private road, where they reached Mr. Chandler's circular driveway. Both officers testified that they knew they were on Mr. Chandler's property when they pulled into his driveway. Mr. Chandler approached the officers on his front lawn, holding a bottle. Mr. Chandler claimed that there were no further noise issues and asked the officers to leave his property. The officers refused to leave Mr. Chandler's property and falsely claimed Mr. Chandler was publicly intoxicated despite being on his private property. Smith and Jones claimed that they were going to search the house and used the "public intoxication" as probable cause. Mr. Chandler refused and asked them to leave again. While Mr. Chandler and the officers were talking, the officers saw multiple people walking on Mr. Chandler's property, two of whom were carrying bottles. None were unruly or loud in the presence of the officer. Mr. Chandler then proceeded to argue with the officers and defend his rights. Mr. Chandler was then falsely arrested on the counts of public intoxication and obstruction of an officer. Officers Smith and Jones took him to the police station and placed him in a holding cell without any further investigation. The officers failed to conduct any field sobriety tests or other intoxication tests after the arrest.

Based on the evidence given by the nonmoving party, including the officer's testimony, no reasonable person can conclude a ruling in favor of the moving party. The law itself states that private property is different than public, and public intoxication involves intoxication on public property. Mr. Chandler was on private property. The officers admit through their testimony that they had no reason to drive up on private property since there was no noise, which was the basis of their original investigation. Once they trespassed on the private property, they attempted to search Mr. Chandler's home without a warrant and any probable cause. His verbal argument defending his rights resulted in his arrest, which was yet another violation of his 4<sup>th</sup> amendment right. These facts are undisputed and, taken in the best light in the appellee's favor, can lead to no other conclusion than a denial of the appellant's motion for summary judgment.

**Conclusion**

The decision of the lower court should be upheld. Officers Jones and Smith violated Mr. Chandler's 4th Amendment right of unreasonable search and seizure by trespassing onto his property, attempting to search his property on a false claim of public intoxication, and arresting him for merely defending his rights. The Ohio Supreme Court should confirm the circuit court's decision to deny the officers qualified immunity based on the fact that the officers knowingly violated Mr. Chandler's 4th amendment right through their testimony stating that they knew they were on Mr. Chandler's private property when they arrested him for public intoxication. Finally, The Ohio Supreme Court should uphold the circuit court's ruling in denying the officers of Summary of Judgement due to the inability of a reasonable mind to rule in favor of the motion party when all evidence is in the plaintiff's favor. The decision of the lower court should be upheld.

Respectfully submitted,

Isabel Shihab

Attorney of the Appellee



# OHIO YOUTH IN GOVERNMENT 2024

## CASE #5



Bennett v Sims

**THE MODEL SUPREME COURT OF THE STATE OF OHIO**

Ricky Bennett

vs.

Jeffrey Sims

Prosecution (appellant)

Defendant (appellee)

Aden Crabtree

Sabella McCarty

Deonna Huston

Attorney for the Appellant

Attorneys for the Appellee

## STATEMENT OF FACTS

Ricky and Cher Bennett and their children Kyle, age 8; Madison, age 6; and Chance, age 5 moved to Cincinnati, Ohio in the fall of 1996. Jeffrey and Stacey Sims were Bennett's next-door neighbors.

The Sims have a pool on their property which had gone unused for three years. At the time the Bennetts moved next door, the Sims pool was covered by a tarp and surrounded with fencing. After the Bennetts moved in, the Sims removed the tarp and drained the pool. However, they permitted rainwater to collect in the pool. The rainwater accumulated to a depth of over six feet. The Sims removed the fencing on two sides of the pool. The pool became pond-like, containing tadpoles and frogs. The side of the pool became slimy with algae. The pool contained no ladders.

The Sims and the Bennett houses were one hundred feet apart. There was some fencing that ran parallel between the two properties. But there is an eight-foot section of yard between the houses which was not covered by fencing. The Sims were aware that the Bennetts had small children who often played in the Bennett's yard unattended. The Bennetts were aware of the condition of the Sims' pool. The Sims did not have any property signs posted that warned of the pool or stated, "no trespassing".

On the afternoon of March 20, 1997, Chance and Kyle Bennett were playing at the Sims' pool with the frogs. The Sims did not invite them onto their property or to the pool. Chance slipped into the pool. Kyle went to get Cher Bennett. It appears that Cher Bennett also slipped into the pool. When Ricky arrived at home later that afternoon, he found Kyle sobbing uncontrollably. When questioned by Ricky, Kyle told her father that Mommy and Chance were

"drowning in the water". Ricky ran next door and found his wife and son unconscious in the pool. He pulled the two from the water and tried to revive them. He was unsuccessful. Cher Bennett and Chance Bennett were pronounced dead by University Hospital later that evening. Ricky Bennett in his capacity as Administrator of the Estate of Cher Bennett and Administrator of the Estate of Chance Bennett filed a wrongful death suit against the Sims in the Hamilton County Common Pleas Court. The Complaint alleged that the Sims had negligently maintained their pool and the negligence was the proximate cause of the deaths of Cher and Chance Bennett. Mr. Bennett further alleged that the Sims should have known the pool posed an unreasonable risk of serious harm to others and that children, especially because of their youth, would not recognize the danger. The appellant sought compensatory and punitive damages.

The Sims denied any negligence. The Sims filed a motion for summary judgment. The trial court found that Cher and Chance Bennett were trespassers on the Sims' property and the only duty owed by the Sims was to refrain from wanton and willful misconduct. The trial court did not find any wanton or willful misconduct on behalf of the Sims. The trial court found the Sims owed no duty of care to Chance and Cher Bennett. The trial court entered judgment for the Sims as a matter of law. Ricky Bennett appealed the decision of the trial court to the First District Court of Appeals. The First District Court of Appeals affirmed the trial court. The matter is before the Ohio Supreme Court upon the allowance of a discretionary appeal.



## **Assignment of Errors**

1. The Simm's swimming pool did not follow the pool code in the City of Cincinnati's pool laws.
2. The trial court found that Cher and Chance Bennett were trespassers on the Sims' property but there was no, no trespassing signs on the property or near the property.
3. The Simms knew of the condition of their pool and property and did not adhere to the law when living near small children.

## **Arguments:**

**Argument 1:** Despite the fact that in premises liability cases a landowner's duty is defined by the status of the plaintiff, and that children, even child trespassers, are accorded special protection in Ohio tort law. Every person owning land on which a family (residential) swimming pool is situated, which constitutes an obvious hazard, or which is more than 24 inches in depth at any point or greater than 150 square feet in surface area, shall erect and maintain thereon an enclosure surrounding the pool area, sufficient to make such a body of water inaccessible to small children. The utility to the possessor of maintaining the condition and the burden of eliminating the danger are slight as compared with the risk to children involved. In this case, there is at least a genuine issue of fact regarding the foreseeability of one of the Bennett children entering onto the Simms property. The child was a visitor; here, the child resided next door. Reasonable minds could conclude that it was foreseeable that one of the Bennett children would explore around the pool.

**Argument 2:** "The dangerous instrumentality exception [to nonliability to trespassers] imposes upon the owner or occupier of a premises a higher duty of care to a child trespasser when such owner or occupier actively and negligently operates hazardous machinery or other apparatus, the dangerousness of which is not readily

apparent to children.” McKinney v. Hartz & Restle Realtors, Inc. (1987), 31 Ohio St.3d 244, 247, 31 OBR 449, 452, 510 N.E.2d 386, 390. That doctrine was developed in Coy v. Columbus, Delaware & Marion Elec. Co. (1932), 125 Ohio St. 283, 181 N.E. 131, a case where a six-year-old boy was injured when he touched a high voltage transformer owned by the defendant and located in a vacant lot known to be frequented by children. The court applied a negligence standard to the behavior of the company, despite the fact that the child had been trespassing. This court quoted with favor the court in Haywood v. S. Hill Mfg. Co. (1925), 142 Va. 761, 765-766, 128 S.E. 362, 363-364: ‘Certainly a deadly, hidden force, as in this case, should not be left easily accessible to children whose frequent presence in this vicinity was known to the defendant, and acquiesced in by it, and this without so much as a danger sign anywhere thereabout

**Argument 3:** To licensees and trespassers, on the other hand, “a landowner owes no duty except to refrain from willful, wanton or reckless conduct which is likely to injure [the licensee or trespasser].” Gladon, 75 Ohio St.3d at 317, 662 N.E.2d at 293. ‘Children of tender years, and youthful persons generally, are entitled to a degree of care proportioned to their inability to foresee and avoid the perils that they may encounter. The same discernment and foresight in discovering defects and dangers cannot be reasonably expected of them, that older and experienced persons habitually employ; and therefore the greater precaution should be taken, where children are exposed to them.’ ” Di Gildo v. Caponi (1969), 18 Ohio St.2d 125, 127, 47 O.O.2d 282, 283, 247 N.E.2d 732, 734, quoting Ohio Jurisprudence 2d 512 (1959), Negligence, Section 21.

**Conclusion:** So in conclusion the property of the Simms was unsafe to children of a young age and the pool was not safe for them or any trespassers making it deadly to them. Aswell as that, there were no postings of this danger anywhere on the property and all safety measures were removed. So all these concluding factors lead to the negligence of the homeowners and their property, and them not obeying previous precedented law to allow for the safety of children no matter if they are trespassing or not.

## **APELLEE'S BRIEF**

### **ARGUMENTS**

Argument #1 - The Defendant was not responsible for ensuring the safety of Chance and Cher Bennett given they were trespassers.

Jeffery Sims had no obligation to protect or give care to the Bennetts since they were illegally trespassing on his property. The conviction of general criminal trespass is a fourth-degree misdemeanor that can result in up to thirty days in jail and/or a fine of up to \$250.00. According to the Ohio Revised Code section 2911.13 "No person by force, stealth, or deception, shall trespass in an unoccupied structure, with purpose to commit therein any theft offense, as defined in section 2913.01 of the Revised Code, or any felony."

A landowner is only responsible for ensuring the protection of those who are invitees on his/her property; therefore, Sims is not at fault for the death of Chance and Cher.

Chance Bennett entered the Sims' property uninvited. He continued to remain on their property without the landowner's permission. Without the consent and confirmation that Chance could stay on their property, it is concluded to be criminal trespassing.

Argument #2 - The maintenance of the defendant's pool can not be declared wanton or willful.

Wanton misconduct is defined as when someone fails to exert care to whom he owes it under the circumstances that it could cause any harm whatsoever. Willful misconduct includes intentionally causing harm or injury. Taking into consideration that neither Chance nor Cher Bennett was invited to the Sims' property, their death was not Jeffrey Sims' fault as he was unaware. The Bennetts have no say in how the Sims maintain their property, so the claim of negligence in taking care of the pool is invalid.

Due to the fact that Jeffery Sims was not aware of the Bennetts being on their property and they were trespassing, we can declare that the safety of others in this situation was not in the hands of the Sims. The defendant had denied any negligence and that the Bennetts were trespassers. The Sims' only duty was to stray away from any kind of wanton and willful misconduct. It was agreed on by the trial court that the Sims did, in fact, not find any wanton or willful misconduct. The trial court is then sent to a judgment and finds that the Sims had no reason to care for the loss of Chance and Cher Bennett. The trial court was affirmed by the First District Court of Appeals that the defendants should have no care for the problem at hand.

Argument #3 - The granted motion for summary judgment over Sims was correct

With the motion of summary judgment being rendered over Sims, we can provide that the defendant can not be disadvantaged by the use of pleadings, used for answers of interrogations, depositions, affidavits, a moving of party to entitlement of the motion granted as a matter of the

law or written admissions. The party has argued that there is truly not any kind of real dispute over the material facts of Sims and their pool. Due to the summary judgment over the defendant, the moving party is entitled to win the case over the Bennets by a matter of law.

The Appellants argue that the Appellee should have the duty to care for the death of Chance and Cher Bennets. However, even with the Appellant arguing further that the Appellee violated the duty to care for the Bennets, thus this would make Sims liable for their deaths.

However, with a review of the pleadings that were submitted, it was clear that the Appellee was not responsible or at fault for the death of Chance and Cher Bennett's death due to the summary judgment during the trial. The Bennets were seen as trespassers and by law, Sims can not be responsible for the Apellant's injuries or deaths stated by the *Wills v. Frank Hoover Supply* (1986) trial. This concludes that the Sims are, in fact, not responsible for the loss of Chance and Cher Bennet's deaths.

## **Conclusion**

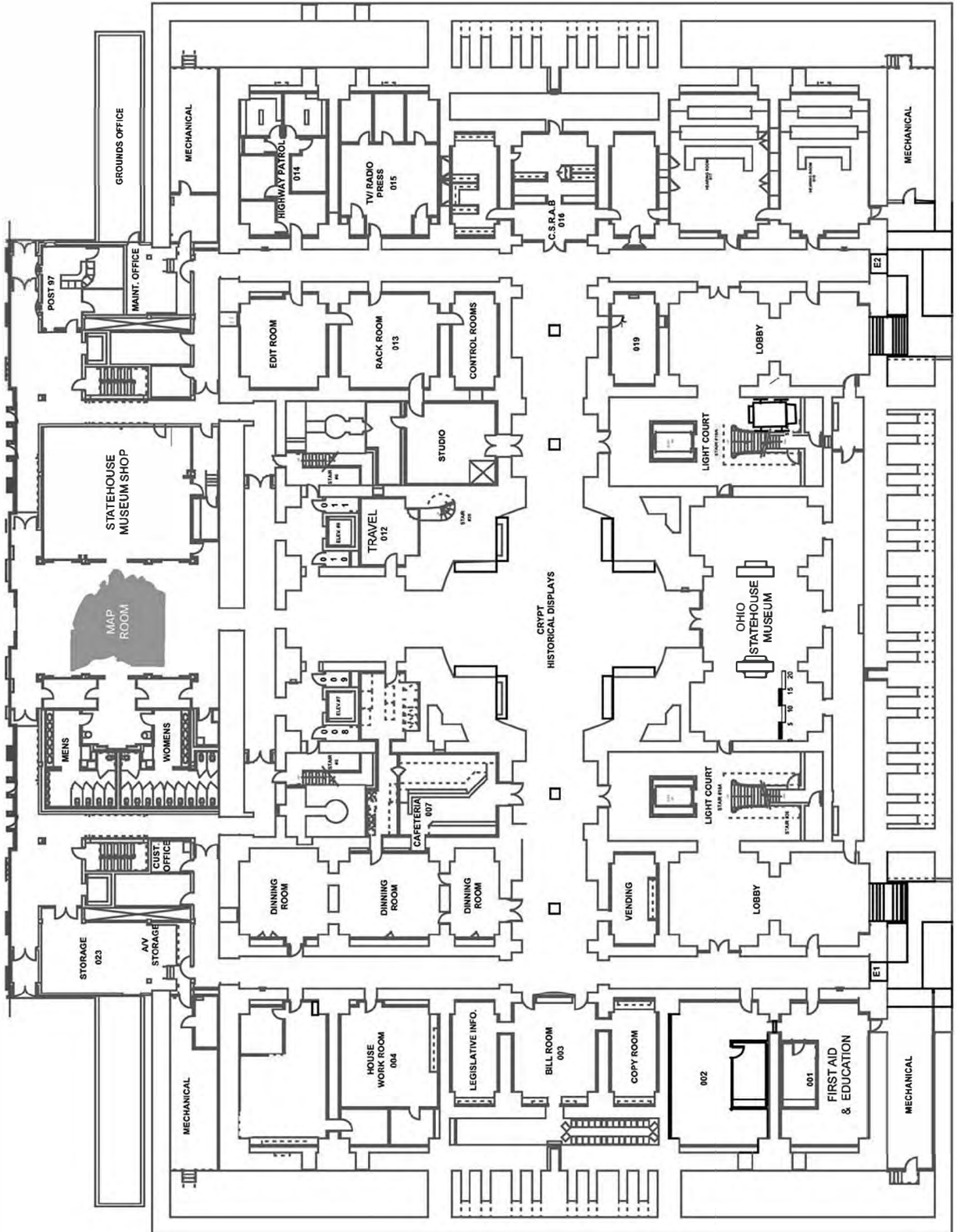
In summary, from the fact that the Sims were not owed to be responsible or have duty over the deaths of Chance and Cher Bennet due to them being trespassers. We can conclude that the state of the Sims pool was in no danger. By view of the Sims' neighbors, they could have seen the state of the pool and had no need to not stray away from it as well as trespass on the

Sims' property. The actions of maintenance on the Sims pool was concluded to be neither waton nor willful. Foremost, the Sim's actions were in no touch of the proximity the Bennets were to their pool also including their property. Lastly concluding, the Sims were in no way by law responsible for the deaths of Chance and Cher Bennet.

Submitted by:

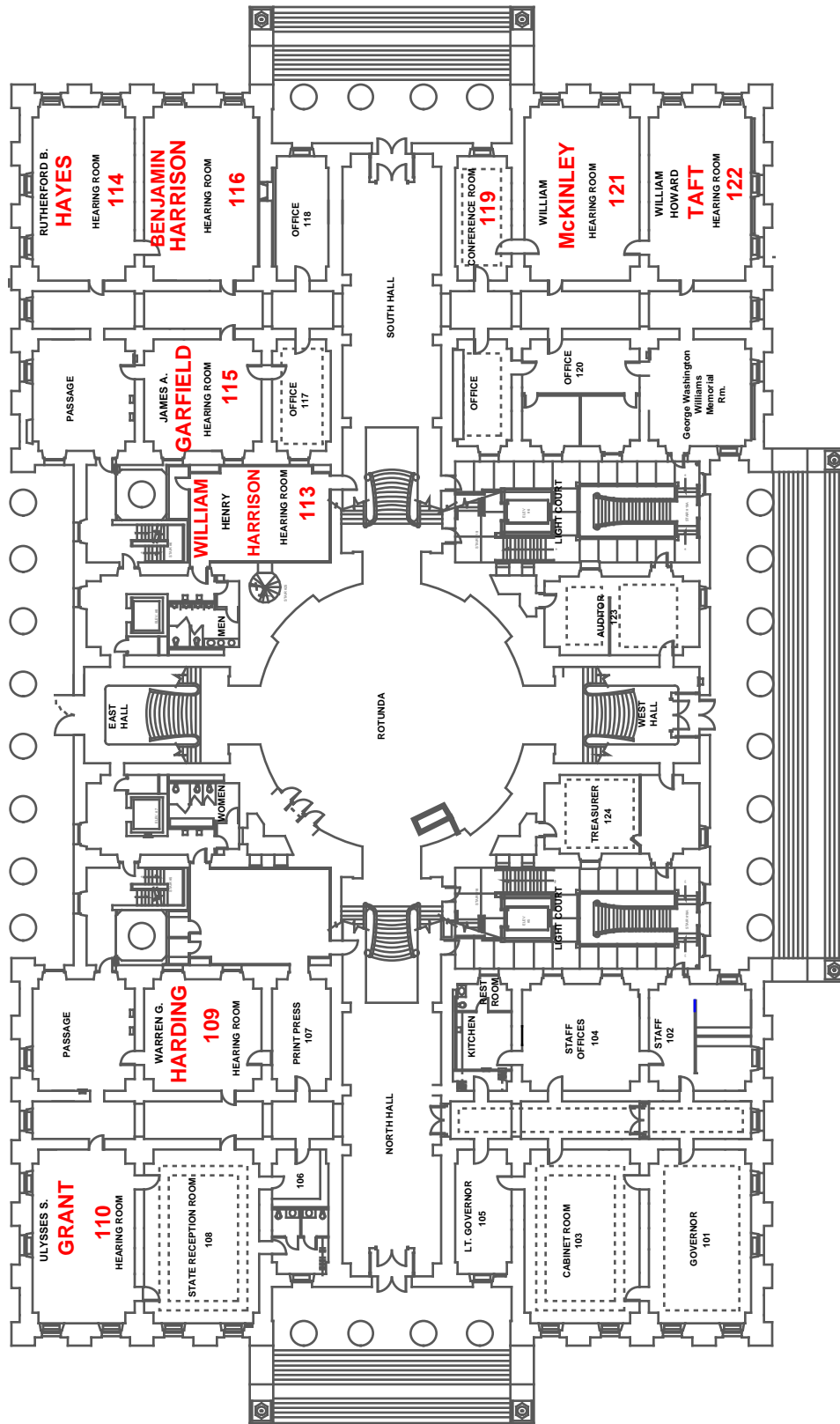
Deonna Huston  
Sabella McCarty  
Attorneys for the Appellee

# STATEHOUSE FLOOR PLANS



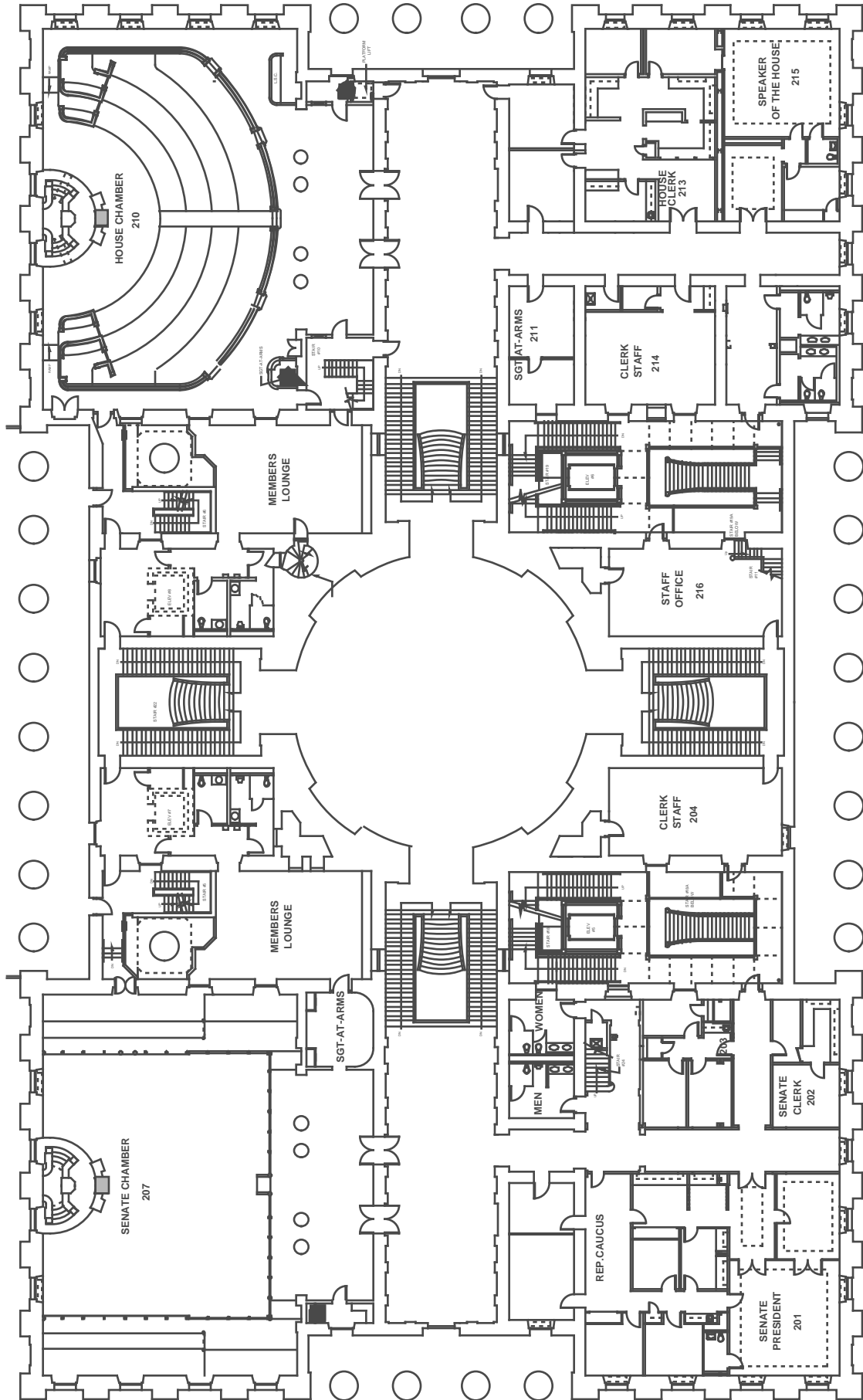
STATEHOUSE GROUND FLOOR

updated 6-23-09 CSRAB

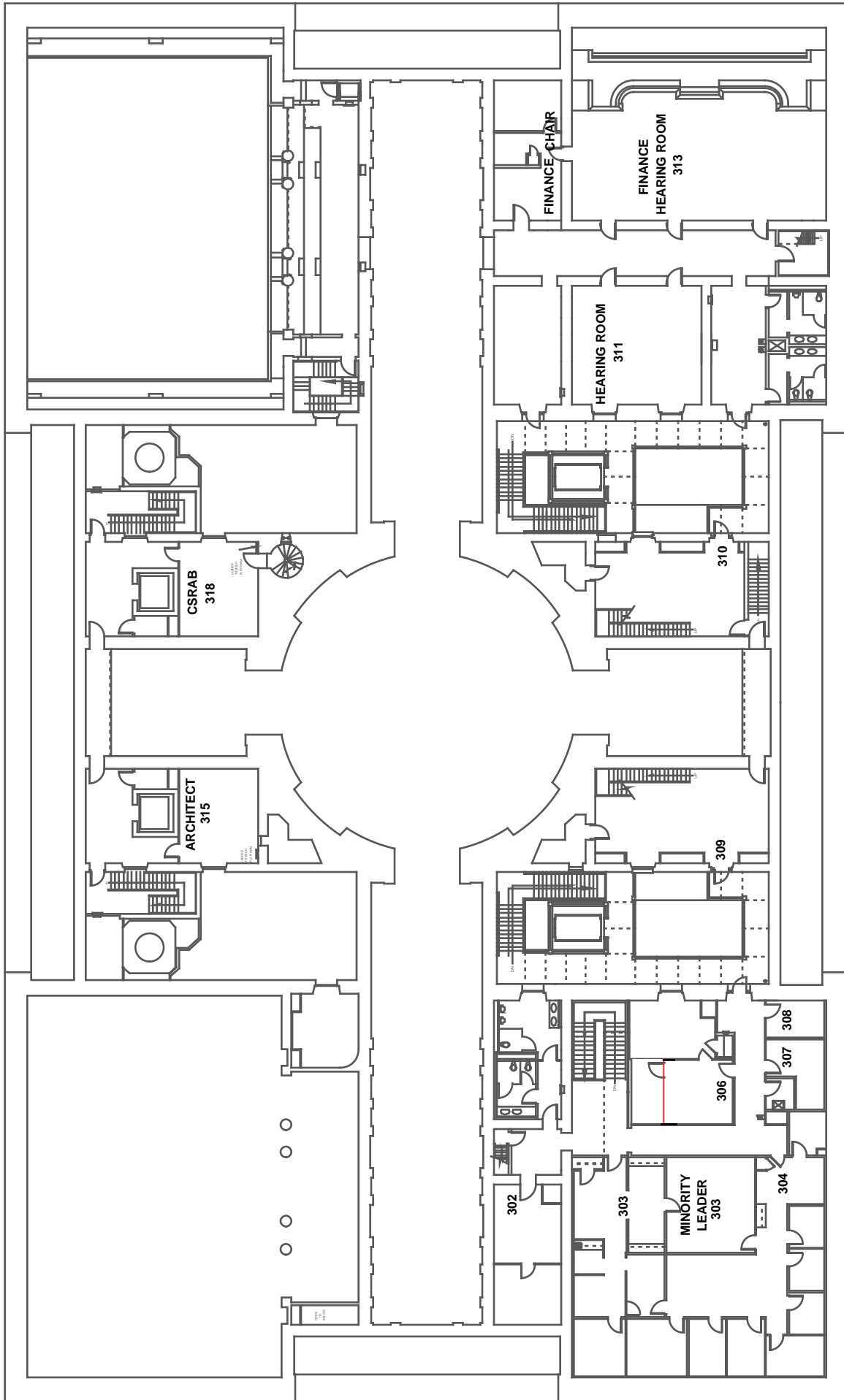


STATEHOUSE 1ST FLOOR

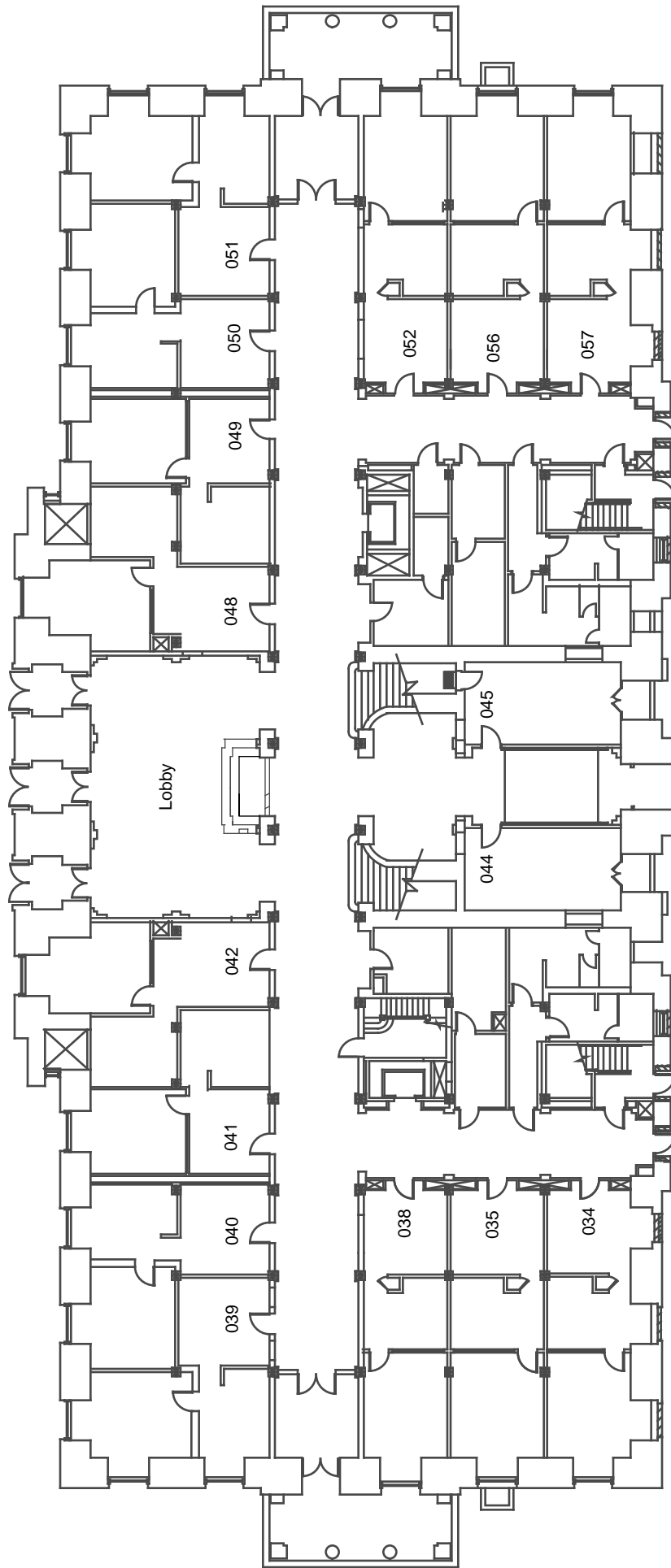




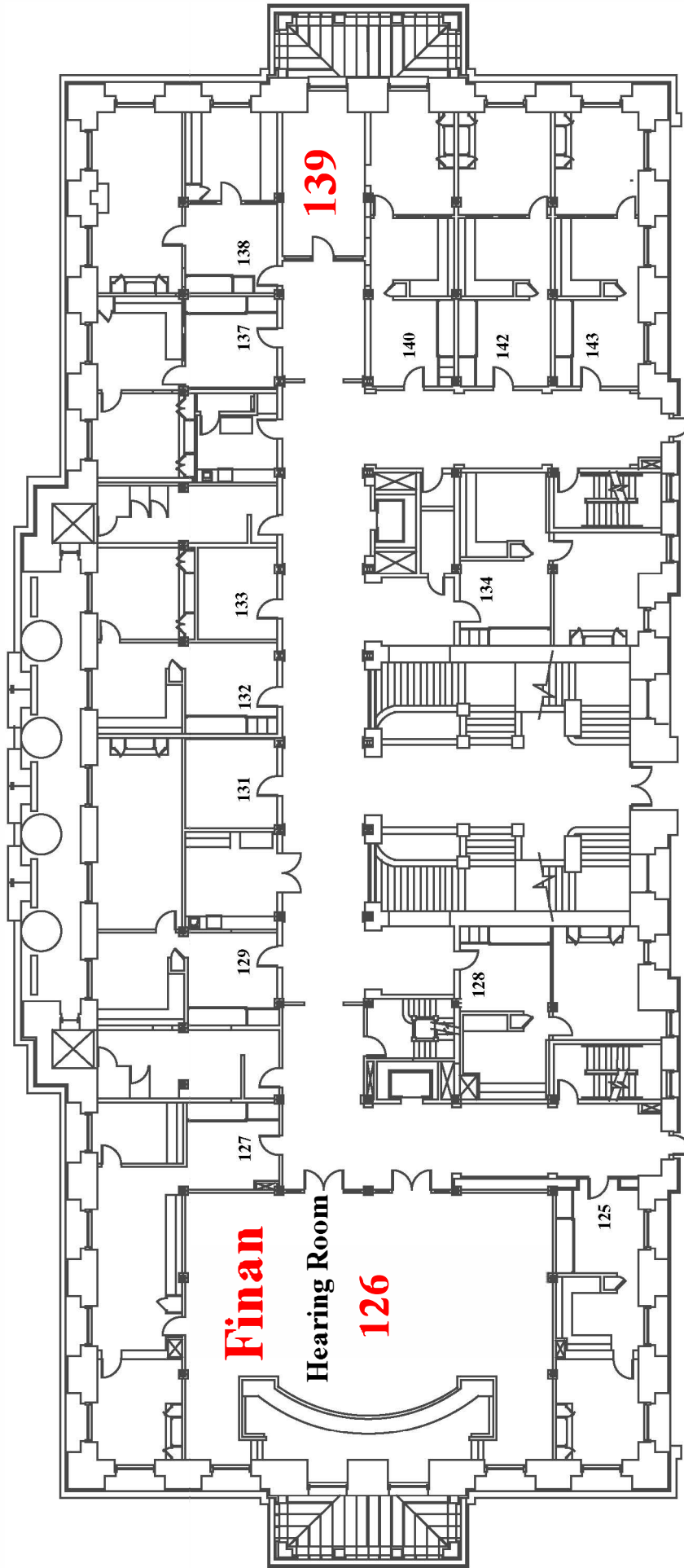
STATEHOUSE 2ND FLOOR



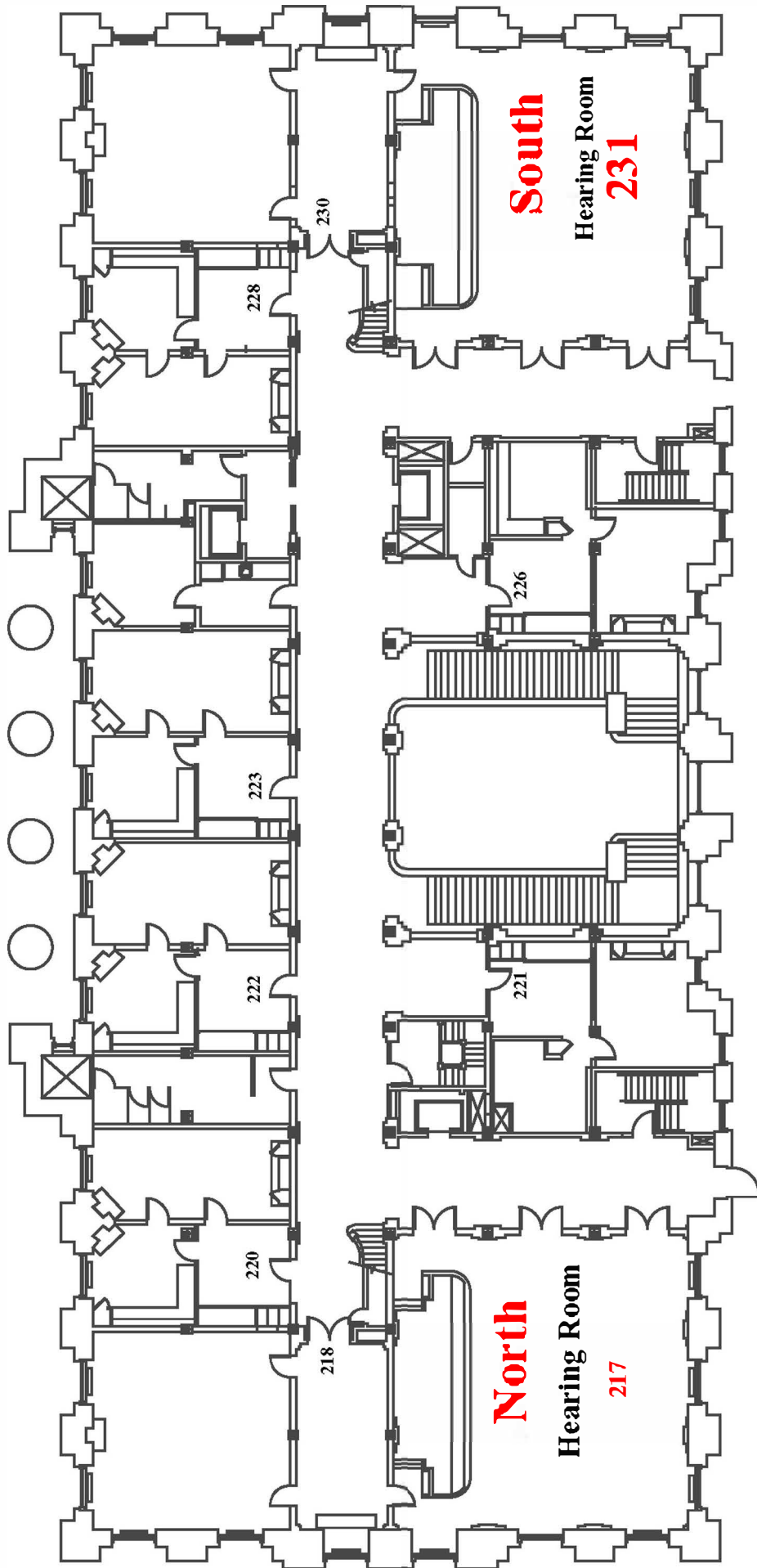
STATEHOUSE 3RD FLOOR



**SENATE BUILDING GROUND  
FLOOR**



**Senate Building 1st Floor**



**SENATE BUILDING 2ND FLOOR**



## 2024 OHIO YLA YOUTH IN GOVERNMENT DIRECTORY

<b>EXECUTIVE</b>		
<b>NAME</b>	<b>DELEGATION</b>	<b>TITLE</b>
Braelyn Brennan	Jackson	Associate Justice
Allison Causey	Jackson	Secretary of Health & Human Resources
Kollier Fulton	Jackson	Associate Justice
Maggie Gilmore	Washington CH	Youth Governor
Lucas Jolly	Jackson	Speaker of the House
Liam Milliken	Jackson	Lieutenant Governor
Abby Plants	Jackson	Secretary of Finance
Liliana Printz	Calvary Christian	President of the Senate
Sophia Rhoades	Western	Secretary of Education
Tessa Risner	Western	Associate Justice
Haley Ross	Jackson	Secretary of Tourism
Sierra Stamper	Western	Youth Chief Justice
Kydin Whitmore	Western	House Clerk
<b>JUDICIAL</b>		
<b>NAME</b>	<b>DELEGATION</b>	
Jacob Allen	Jackson	
Armaan Chaudhary	Wellington	
Aden Crabtree	Jackson	
Christopher Crabtree	Jackson	
Zoie Ervin	Jackson	
Deonna Huston	Jackson	
Rowyn Hubbard	Wellington	
Ryan LeFever	Jackson	
Bralee Lyons	Jackson	
Jake Malloy	Wellington	
Sabella McCarty	Jackson	
Drew Neff	Jackson	
Isabel Shihab	Wellington	
Cannon Stiffler	Jackson	
Sophie Williams	Jackson	

<b>LEGISLATIVE</b>				
<b>Name</b>	<b>Delegation</b>	<b>Seat</b>	<b>Heard In</b>	<b>Member of</b>
<b>Margaret Adams*</b>	Wellington	H 48	H 02	H 01
Brooks Adiansingh	Wellington	H 29	H 01	H 02
Hussein AlAli	Wellington	H 30	H 01	H 02
Lucy Allen	Wellington	H 64	H 02	H 01
Henry Allen	Wellington	H 37	H 03	H 02
Madison Allen	Washington CH	Senate H	S 02	S 01
Ameer Awan	Wellington	H 33	H 03	H 02
Charlie Barloy	Western	H 43	H 03	H 02
<b>Ahmed Batun*</b>	Wellington	H 38	H 03	H 02
Henry Becker	Wellington	H 18	H 02	H 03
Mason Blackburn	Western	H 71	H 01	H 02
Dottie Blackburn	Wellington	S 31	S 02	S 01
Phoebe Bong	Wellington	H 42	H 02	H 03
Sabrina Bong	Wellington	H 03	H 02	H 03
Isaac Brady	Wellington	S 15	S 02	S 01
Ross Braswell	Wellington	S 20	S 02	S 01
Emerson Braunsdorf	Wellington	S 05	S 02	S 01
Sam Breyfogle	Wellington	Senate A	S 01	S 02
Eli Browning	Jackson	Senate K	S 01	S 02
Benjamin Butler	Wellington	H 25	H 02	H 03
Catherine Cartmell	Wellington	H 06	H 03	H 01
Eli Cellino	Wellington	H 28	H 03	H 01
Isabella Cios	Wellington	S 24	S 01	S 02
Matthew Clay	Washington CH	H 55	H 02	H 03
Erin Conselyea	Wellington	H 47	H 02	H 01
Madhuri Cook	Calvary Christian	S 13	S 02	S 01
Elizabeth Cooke	Wellington	S 04	S 02	S 01
Emma Cooke	Wellington	S 09	S 01	S 02
Lorenzo Corso	Wellington	S 25	S 01	S 02
Daymion Daulton	Washington CH	H 54	H 02	H 03
Matthew Dittrick	Wellington	H 17	H 02	H 03
Eli Erlanger	Wellington	H 14	H 01	H 02
Deegan Evans	Jackson	H 15	H 01	H 03
Leevi Fite	Western	H 68	H 03	H 01
Emma Fling	Wellington	S 03	S 02	S 01
Kari Gantz	Calvary Christian	S 23	S 01	S 02

**Committee Chair\***



<b>LEGISLATIVE</b>				
<b>Name</b>	<b>Delegation</b>	<b>Seat</b>	<b>Heard In</b>	<b>Member of</b>
Solomon Graham	Wellington	H 27	H 03	H 01
Chloee Harris	Jackson	Senate I	S 02	S 01
Makenna Henry	Wellington	H 01	H 01	H 02
Jeremiah Hermiller	Calvary Christian	H 32	H 02	H 03
Nathan Hughes	South Webster	H 51	H 02	H 01
Nicole Hughes	South Webster	H 52	H 02	H 01
Oscar Humbert	Wellington	S 01	S 01	S 02
Kyra Hunter	Wellington	H 04	H 02	H 03
Elaina Huston	Jackson	Senate J	S 02	S 01
Reagan Hutchinson	Western	H 56	H 01	H 02
Li Jiang	Wellington	H 16	H 02	H 03
Mika Johnson	Wellington	H 10	H 02	H 01
Maxwell Johnson	Wellington	S 21	S 02	S 01
Tommy Jones	Wellington	S 16	S 01	S 02
<b>Shivum Kalyanam*</b>	Wellington	S 28	S 02	S 01
Aayzah Khan	Wellington	S 18	S 01	S 02
Hanna Kilgren	Wellington	H 66	H 03	H 02
Ari Kirsner	Wellington	H 34	H 03	H 02
Koen Kwak	Wellington	S 29	S 02	S 01
<b>Charlie Lanning*</b>	Wellington	H 49	H 01	H 03
Graciela Leahy	Wellington	H 20	H 01	H 02
Jack Mahaffey	Wellington	S 17	S 01	S 02
Imogin Manley	Wellington	H 11	H 01	H 03
Roarke Marincic	Wellington	H 62	H 01	H 03
Griffin Martin	Wellington	S 11	S 02	S 01
Amanda Martinez	Wellington	H 67	H 03	H 02
Hudson McConnell	Wellington	Senate B	S 01	S 02
Madeline Meimaridis	Wellington	H 45	H 03	H 01
Maddie Mercer	Jackson	H 59	H 02	H 03
Nectarios Michailidis	Wellington	S 14	S 02	S 01
Roxanne Milar	Western	Senate C	S 02	S 01
Ethan Miller	Wellington	S 06	S 02	S 01
Luca Mlicki	Wellington	H 35	H 02	H 01
Callee Moore	Washington CH	H 53	H 02	H 03
Dayne Neff	Jackson	Senate N	S 02	S 01
Skyler Nicholson	Wellington	S 26	S 01	S 02
Zalika Obayuwana	Wellington	H 46	H 03	H 01
Eve O'Sullivan	Wellington	H 39	H 01	H 02
Donovan Otcasek	Wellington	S 32	S 01	S 02
Ali Ozer	Wellington	H 60	H 03	H 01
Ethan Paider	Wellington	H 61	H 03	H 01

**Committee Chair\***

<b>LEGISLATIVE</b>				
<b>Name</b>	<b>Delegation</b>	<b>Seat</b>	<b>Heard In</b>	<b>Member of</b>
Jacob Palmer	Calvary Christian	H 22	H 03	H 01
Annabeth Pan	Wellington	H 09	H 02	H 01
Wasif Pathan	Wellington	H 26	H 03	H 01
Annika Raghunathan	Wellington	H 23	H 03	H 01
<b>Gretchen Reed*</b>	Washington CH	Senate G	S 02	S 01
Anastacia Rogan	Calvary Christian	S 07	S 01	S 02
Stephen Rosan	Wellington	H 05	H 03	H 01
Taj Ruegsegger	Wellington	H 08	H 03	H 02
Lillian Schrader	Wellington	H 41	H 02	H 03
Victoria Scott	Wellington	H 40	H 01	H 02
Destiney Seaman	Western	H 70	H 01	H 02
Annie Shen	Wellington	S 02	S 01	S 02
Dea Singh	Wellington	S 30	S 02	S 01
Hunter Slack	South Webster	Senate E	S 01	S 02
Isaac Slark	Jackson	Senate M	S 02	S 01
Ruby Slemmons	Calvary Christian	S 22	S 01	S 02
Maryn Smith	South Webster	Senate F	S 01	S 02
Asher Sniderman	Wellington	H 50	H 01	H 03
Lauren Sodhi	Wellington	H 44	H 03	H 01
Jack Spicer	Wellington	H 13	H 01	H 02
Jadyn Talbott-Boord	Wellington	H 19	H 01	H 02
Jacob Thomas	Wellington	H 65	H 02	H 01
Mary Claire Thompson	Wellington	H 36	H 02	H 01
<b>Brianna Thomsen*</b>	Calvary Christian	S 08	S 01	S 02
Arjun Tonapi	Wellington	H 63	H 01	H 03
Atticus Trubilowicz	Wellington	H 07	H 03	H 02
Timchia Tubuo	Wellington	H 24	H 02	H 03
Genevieve VanDixhorn	Wellington	S 19	S 01	S 02
Logan Vargo	Wellington	H 12	H 01	H 03
Samika Varma	Wellington	S 10	S 01	S 02
Malcolm Wade	Wellington	S 27	S 01	S 02
Chase Ware	Western	H 69	H 03	H 01
Lauren Ware	Western	Senate D	S 02	S 01
Brayden Weaver	Wellington	S 12	S 02	S 01
Finnegan Wheeler	Wellington	S 33	S 01	S 02
Megan Whitley	Western	H 57	H 01	H 02
Taylor Williams	Jackson	H 58	H 02	H 03
Natalie Wish	Calvary Christian	H 21	H 03	H 01
Riya Young	Wellington	H 02	H 01	H 02
Daniel Young	Calvary Christian	H 31	H 02	H 03

**Committee Chair\***

**LOBBYISTS**

<b>NAME</b>	<b>DELEGATION</b>
Kerrigan Marhoover	Western
Desirae McJunkin	Western
Dean Montgomery	Western
Kamryn Muncy	Jackson
Trevon Price	Western
Elexys Scharbrough	Western
Tayvin Short	Western
Mckenna Silcott	Western
Kaden Wireman	Western

**PAGES**

<b>NAME</b>	<b>DELEGATION</b>	<b>ASSIGNMENT</b>
Macie Colburn	Western	House Committee 1 / House Chamber
Scotlyn Jordan	Western	House Committee 2 / House Chamber
Sydney Keslar	South Webster	Youth Governor
Kate Park	Western	Senate 2 / Senate Chamber
Eden Smith	South Webster	Senate 2 / Senate Chamber
Beau Stephens	South Webster	House 3
Breleigh Tackett	Western	House Committee 3 / Governor when House in Session
Madelyn Trittschuh	Calvary Christian	Senate 1 / Senate Chamber

**PRESS**

<b>NAME</b>	<b>DELEGATION</b>
<b>Chloe Maybin - Press Editor</b>	South Webster
Cutter Clay	Western
Ethan Gedeon	Western
Jagger Grooms	Western
Kameron Janes	Western
Landon Marhoover	Western
Wesley Satterfield	Western

<b>ADVISORS</b>		
<b>NAME</b>	<b>DELEGATION</b>	<b>ASSIGNMENT</b>
Erin Cornett	Wellington	Bill Coordinator
Drew Eberly	Wellington	House Committee 1 Advisor
Nick Geruntino	Washington CH	House Chamber Advisor
Cindy Green	Jackson	House Committee 3 Advisor
Curt Hansen	Wellington	Judicial Advisor
Daniel Hood	Western	Senate Committee 1 Advisor
Sara Hunt	Western	House Committee 2 Advisor
Cyndy Hykes	South Webster	Press Advisor
Amy LeCrone	Calvary Christian	Senate Chamber Advisor
Tara Reed	Western	Lobbyist & Page Advisor
Kelli Wilson	Jackson	Senate Committee 2 Advisor
<b>VOLUNTEERS</b>		
Lauren Clagg		
Tess Elsoff - Board Member		
Colton Gibbs		
Chandler Grooms		
<b>STAFF</b>		
David King	YLA Director	
Alicia Ridenour	YLA Fiscal Officer	

*Thank you!*

**To all the advisors  
and volunteers. We  
couldn't do this  
without you!**

## Officer Leadership Corps

### **YLA groups, Youth in Government, Model United Nations Officers Lead in Building Better Futures**

#### **Officer Charter**

Student officers strengthen, improve and expand all our youth programs to involve more students building better homes, schools and communities across our two states. Student officers are program leaders – in effect the youth program arm of our Ohio-West Virginia Youth Leadership Association Board.

Officers convene at a Leadership Summit at Horseshoe in June to organize, identify and plan how to strengthen all our programs, increase the numbers of students involved and the impact students will have creating the future. The opportunity is there to make differences for good building on and adding to the legacy of officer and member accomplishments that already include –

- ◆ A network of YLAs developing more informed, involved and prepared teenagers capable of governance who take responsible volunteer actions tackling issues from hunger to literacy – homelessness- entrepreneurship – safety – elderly - environment – bullying and more;
- ◆ Building Horseshoe in West Virginia into a life changing experience for hundreds of teens and children each year that is renewing the base of volunteers and leaders for our communities, state and nation;
- ◆ Launching the creation of a new nationally significant Center for Community Leadership at Cave Lake in Ohio to renew family, organizational, community, and civic life across Ohio with on-site programs for 31,000 and a statewide outreach to 6,000 youth;
- ◆ Creating one of Ohio’s top ten Make A Difference Day projects at Cave Lake;
- ◆ Volunteer Teen Corps helping needy boys and girls at the Governor’s Youth Opportunity Camps turn their lives to achievement;
- ◆ Using real life experience to propose legislation to the annual YG Student Legislature that every year helps hundreds of teens understand the role of state government as they propose legislative solutions for a better state;
- ◆ Enhancing understanding of the judicial system as students appeal cases to YG’s Student Supreme Court;
- ◆ Opening windows on the world to teenagers presenting Resolutions in Model United Nations to solve international issues that impact the future as well as their communities, state, nation and world;
- ◆ Producing thousands of better citizens, local volunteers and leaders plus state and national leaders including former Ohio Governor and Peace Corps Director Richard Celeste, the late Ohio Chief Justice Tom Moyer, and Sylvia Mathews Burwell, Secretary of the Department of Health and Human Services;
- ◆ 26th Amendment to the United States Constitution granting the vote to 18 year olds;

#### **A Call for Officers – Now is the Time to Build the Future!**

Students with the interest, commitment and time are called to step up as local YLA officers, YG and UN officers to lead YLA to increased participation, effectiveness and achievement locally and in our states. Officers begin in June’s Leadership Summit at Horseshoe.

Contact the YLA Leadership Center or your Advisor to get involved.

## **Officer Leadership Corps**

### ***Strengthening, Improving, Building Impact in our Schools, Communities and our Two States***

The Ohio-West Virginia Youth Leadership Association Board counts on officers to lead YLA, YG and UN to success. Officers with the commitment, vision and time are needed. We need officers who want to make a difference! Our work begins at our Leadership Summits. The high school Summit and the middle school Summit are in June.

### **Officer Corps**

YLA groups are real-life laboratories of citizenship where students learn how to organize and tackle issues confronting families, their schools and communities by creating, leading and governing local YLAs. Students apply classroom and life lessons to identify, plan and take volunteer actions to improve family, school and community life. YLAs build better futures by making differences for good!

Secure your Officers before May 20th and submit their names and contact information to YLA.

Have as many officers as possible – and for sure your new President – represents you at the June Leadership Summit at Horseshoe. Assure success by getting your officers trained and on board as part of our Officer Corps.

### **Youth in Government Officer Corps**

YG officers review the just completed program, identify ways to improve YG for the New Year, establish goals for the year and lay out a plan of action. Officers engage other students in YG sessions to motivate them to participate and to return home ready to recruit their peers.

YG officers challenge everyone at the Summit to identify issues that need solved by the volunteer actions back home. Out of tackling issues like hunger, homelessness, the environment, needs of seniors, and other problems, students propose Legislation to YG's Student Legislature.

Officer positions elected by students at YG are Governor, Lt. Governor (Ohio only), Speaker, President, Clerks of the House and Senate, Chaplains of the House and Senate, Chief Justice. Appointment positions are Governor's Cabinet, Associate Justices, Press Editor and Committee Chairs.

### **Model United Nations Officer Corps**

UN officers review the just completed program, identify ways to improve UN for the New Year, establish goals for the year and lay out a plan of action. Officers engage other students in UN sessions to motivate them to participate and to return home ready to recruit their peers. YLA will offer separate high school and middle school UN Assemblies.

UN officers challenge everyone at the Summit to identify international issues that need solutions and gain understanding how world issues impact their communities and future. Resolutions presented by students to the Model UN extend YLA's impact beyond the community and state to the world. Hunger, the environment, illiteracy, health and energy are just some world issues confronting our communities that YLA students tackle.

Officer positions elected by students at UN are President of the General Assembly, Secretary General, and Council Presidents. Appointment positions are Vice President of Councils.

## **Officer Responsibilities and Qualifications**

YG officers are members of a YLA currently affiliated with the YLA Leadership Center. Officers are elected at the end of a YG session to serve through the next YG. The year of service is an opportunity to develop and use one's skills, improve YG, help other students have a positive YG experience, involve new schools and students, and advance YLA's youth leadership program.

### **Local YLA Nomination**

Before a YLA holds its nominating meeting, be sure every candidate has the competence, commitment, time, people and social skills as well as attitudes required for to develop and lead others. Officers must be at ease in diverse places including Horseshoe, YLA conferences and retreats, Bill/Case Rating and YG.

**Candidates must win the nomination of their local YLA for the office sought.**

*In other words, a person cannot just decide to run for an office. The person must secure the nomination of their local YLA.*

Delegations may nominate no more than one (1) candidate per office.

The local YLA must have an officer nominating meeting. Every candidate is to have a chance to seek nomination. If there is more than one candidate seeking the nomination for an office, their local YLA will take a vote. The winner of that vote becomes the nominee.

**Delegations submit their official nomination (s) on the Officer Candidate Nomination form in the Legislative manual by the deadline in the YG Calendar.**

### **Potential Candidates**

Before seeking the nomination for an office, make sure –

- ◆ Officers lead YG for a year in diverse places and programs. An officer must be at ease in YLA Summits, conferences and retreats, Bill/Case Rating, and YG. These places are intentionally chosen for the unique ways each calls people to engage with people in community building. YG is much more than parliamentary procedure, passing laws and debate.

Governor and Cabinet, Speaker, President, Chief Justice and Associate Justices participate in the Summer Leadership Summit at Horseshoe. All other officers including the appointed Press Editor are invited and welcome to join them at the Summit!

YG is about being a citizen with others . . . and this takes place in real places where people must act to build community. Because these places and programs are reality – not a virtual reality – they require real people (officers) whose positive attitudes and actions build responsible and engaged citizens.

- ◆ One can commit the time, work and money the position requires. Check one's calendar, check with parents and be sure the family's calendar will allow the commitment of the significant time the office requires. Check one's financial position – that of the family and the local YLA to be sure the money is available. If both time and money are available, lock them in to assure they will still be available if the office is won.

Do not seek the office, get it, and later ask to be excused from any of the position' responsibilities. Other defeated candidates were fully prepared to carry out their duties at these four programs and there were others who did not run because they could not.

- ◆ An officer who does not fulfill their responsibilities may resign or may be removed from office. If that happens, another person will be appointed or elected to the position. The new officer will complete the term of office through April YG.

## **Nomination for Office**

### **Responsibility of the Nominating YLA**

Nominate candidates with the competence to do the job. Please see Officer Duties, Local Nomination and Potential Candidates information above and Officer Responsibilities below.

### **Officer Responsibilities**

#### ***Lead from the bottom up – not the top down***

#### **Set the example:**

- ◆ Do what one asks and/or expects others to do;
- ◆ Help others do and become their best;
- ◆ Assert the purpose of YLA Youth In Government to peers;
- ◆ Insist peers achieve the highest levels of competence, personal and group conduct, respect for others Youth in Government and in facilities our program uses;
- ◆ Practice our core values of Respect – Responsibility – Caring – Trustworthiness – Honesty – Fairness – Citizenship.

### **Attitude**

- ◆ Positive, likes people, welcomes and involves others, helps others succeed.
- ◆ At ease in diverse places including Summit at Horseshoe, YLA conferences and retreats, Bill / Case Rating and at YG – each place is different and all are deliberately chosen to engage people with people  
building understanding and community building – wants to be in these places to enjoy the experience.
- ◆ Puts others first, thinks and acts based on what is best for the group.

### **Responsible**

- ◆ Accept and carry out responsibility;
- ◆ Recognize that Youth in Government is youth led and adult supported;
- ◆ Insist peers be responsible for their attitudes, decisions and actions and that they all support the purpose, procedures and conduct expected by YLA and its Youth in Government;
- ◆ Act responsibly – it is not acceptable to say “that is the Advisor’s job”;
- ◆ Capable and willing to carry out the responsibilities listed in this section of the manual.

### **Competence**

- ◆ Know and understand your job;
- ◆ Know the procedures, carry them out and insist peers do too;
- ◆ Select others for leadership positions based on their competence;
- ◆ Teach peers how to use the procedures;
- ◆ Mature in attitudes and actions.



## **Involvement**

- ◆ Involve others, encourage others, bring more schools and students into YG;
- ◆ Model the involvement expected by others

**Term of Office** - From election or appointment to the adjournment of the next YG; the job is done all year, not just at the spring YG session.

## **Officers at the Summer Leadership Summit**

- ◆ Train for and practice one's responsibilities
- ◆ Review YG Exit Surveys
- ◆ Determine how to strengthen the program
- ◆ Present YG to all participants, encourage their participation, train students to return home ready to prepare their members
- ◆ Learn how to connect YLA's service civic engagement and values to Youth in Government
- ◆ Build a statewide network of peers practicing YLA's core values, advancing YG, and building better futures for all.

## **Officers at YLA Conferences and Retreats**

- ◆ Be prepared in procedure, responsibility, how to do your job and do it so your example of competence sends the message everyone is to achieve the highest standards of conduct, competence, and participation.
- ◆ Involve and engage others—encourage new schools and students to participate.

## **At Bill/Case Rating**

- ◆ Know your job so well and be able to perform it with competence that the level of performance by everyone is raised to the highest levels.

## **Leadership Team**

### **Governor**

#### **Select Cabinet**

- ◆ Up to 6 persons
- ◆ Only one from a school
- ◆ Ideally no one from the governor's home school
- ◆ Cabinet Applications accepted at YG and the week after YG
- ◆ YLA sends applications to Youth Governor two days after due date
- ◆ Youth governor's selections made and YLA informed one week after receipt of applications from YLA
- ◆ YLA office sends letters of appointment or not appointed
- ◆ Governor and Cabinet begin work at Horseshoe Summer Leadership Summit in June

#### **Officers at Summit**

- ◆ Governor and Cabinet review Exit Surveys to determine how to improve for next year
- ◆ With the assistance of the Cabinet, develop a legislative platform

- ◆ By week's end, Governor determines Cabinet assignments
- ◆ Assist in training peers to participate and to train their members back home
- ◆ Recruit new schools and students to participate

### **Public**

- ◆ Serve as a member of the Youth in Government Committee
- ◆ Speak on behalf of the program at events as requested by YLA

### **President of the Senate and Speaker of the House**

- ◆ At Leadership Summit review Exit Surveys to determine ways to improve the Student Legislature, prepare the Legislative training portion of summit, conduct the training, identify students not in YG and recruit their participation
- ◆ Lead other legislative officers present
- ◆ Preside over legislative sessions, insist all participate on an intellectual and productive level
- ◆ Involve and engage other students, encourage new schools and students to participate in YG

### **Lt. Governor**

- ◆ Assist and support the Governor
- ◆ Preside over the Cabinet for the Governor and lead the Cabinet in its work
- ◆ Assist other students to have a successful YG experience. Encourage new school and student participation.

### **Clerks**

- ◆ Know and practice your duties
- ◆ At the Summer Summit, YLA conferences and retreats, Bill Rating, and YG perform your duties to assist in the operation of your House or Senate
- ◆ Assist your Speaker or President
- ◆ At YG, pick up Bills and the Order of the Day from the Bill Coordinator before legislative sessions
- ◆ Keep attendance at each session
- ◆ Read the Bills including amendments as directed by the Presiding Officer
- ◆ Count votes, report vote to Presiding Officer
- ◆ Record and sign all legislation
- ◆ Return Bills to Bill Coordinator, submit completed Bill Disposition and verbally report action taken on each Bill

### **Chaplains**

- ◆ Prepare messages with an impact calling participants to YG's purpose
- ◆ Share your leadership at summer Summit, YLA conferences and retreats, Bill Rating and of course YG
- ◆ Assist your Speaker or President

### **Press Editor**

- ◆ Take the opportunity to join the officers at the Summer Leadership Summit, YLA conferences and retreats, Bill / Case Rating to make connections helpful to you at YG and to be in on "the ground floor" of YG preparations and operations
- ◆ Take a lead in creating outstanding YG Press Corps
- ◆ Encourage, lead, involve and insist all Press Corps members perform with competence

## **Cabinet**

- ◆ Support and represent the Governor's view on proposed legislation
- ◆ Encourage new schools and students to participate in YG
- ◆ Help all participants succeed
- ◆ Report to the Governor legislative views of Committees, Legislature and members

### **Competence**

An important goal is to raise the level of competence of Legislators, Committee Chairs and all Officers. Success requires a joint effort by Officers, Staff and Advisors. Officers must accept their responsibility to lead their peers in directions required for a successful YG. Officers must take on responsibility to stand up to their peers when needed to correct or re-direct them and must always stand up to lead in positive ways. Any officer who cannot do this is expected to resign so that a person who can do the job with the right attitude can be appointed to get the job done.

### **Before Seeking Office**

Potential candidates are to be sure they have the attitudes to positively participate in and provide the leadership needed throughout the year. Candidates must be sure they can commit the time the position requires. Do not seek the office, get it and then later ask to be excused from any of the position's responsibilities. Others who ran and were defeated were fully prepared to carry out their duties and there were others who did not run because they knew they could not.

One year of previous Youth in Government experience required for Speaker and President. Governor Candidates must have two years of YG experience. Governor Candidates may count the current year participation as one of those two years.

***It is not just to get the office – it is to carry out the commitments of the office.***

## **Election Procedure at Youth in Government**

Candidates demonstrate their ability to do the responsibilities of the position they seek. There is no campaign, campaign speech, campaign material, electronic or phone campaigns. Campaigning for office in the manner regularly observed in real-life politics is prohibited.

No person should be eliminated from running for office because of finances. Candidates do not "buy" an election because of "stuff" (i.e. buttons, giveaways, posters, flashy websites, business cards, etc.). It is also essential that the process of the election not overshadow the actual work being done at YLA Youth in Government or Model UN.

Candidates are to be elected based on their positions on issues, leadership and an informed electorate. We encourage members to explore the qualifications, leadership record, and character of each candidate seeking their support.

YLA reserves the right to rule on campaign-related issues that arise as a result of evolving technology. Candidates who do not follow approved campaign procedures may be disqualified from the election process.

Each YLA member is encouraged to take an active part (as a candidate, or as a voting member). Our purpose is to select the most qualified candidates for the job. Our purpose in running for offices to serve should never be overshadowed by the election process (campaigning).

Delegates are responsible to vote for the best candidate and are not to be influenced by their Advisor or other adults seeking to determine the outcome of an election.

### **Campaign Do's and Don'ts:**

#### **YES**

- Conversations with delegates (one-on-one)
- Social Media use that is positive and does not attack other candidates. IF a candidate has a website, it must be created and hosted with absolutely no cost/expense associated with it whatsoever.
- Demonstration of abilities during each program

#### **NO**

- Speeches/campaigning during program (other than YLA-scheduled times)
- Buttons, posters, flyers, giveaways
- Social Media that attacks another candidate
- Signage/flyers at hotel or Capitol/Statehouse

### **Candidates Follow This Procedure**

**Chaplain** candidates give a three (3) minute presentation that calls (challenges) the Legislature to its purpose. Chaplain candidates make presentations that demonstrate how they will perform their duties as Chaplain. Candidates for Chaplain may be asked to perform the duties of Chaplain during a session.

**Clerk** candidates sight read a Bill selected by the Presiding Officer.

**Lt. Governor** is an elected office in Ohio, not in WV. In WV YLA Youth in Government, the Senate President is the Lt. Governor. Candidates for Lt. Governor speak for 2 minutes on the "Role of the Lt. Governor in the Student Legislature."

**President and Speaker** candidates preside over a session of the Legislature using a Bill before the Legislature as determined by the Legislative Calendar or a Bill of their choice. The candidate selects the Bill, a person to be Clerk, Authors, Minority and Majority Reporters and Legislators to speak for and against the Bill. Candidates exhibit their knowledge of the procedure by conducting the session that lasts no more than five (5) minutes. The procedure used is:

"The Student Legislature is in session." (gavel to order)

"This being an extraordinary session, we will dispense with the Chaplain's message, and the reading of the Journal and the Order of the Day."

"Is the Author of the Bill present?" (Recognize the Author for a 30 second presentation of the Bill) "Is there a Majority Report?" (no more than 30 seconds)

"Is there a Minority Report?" (no more than 30 seconds)

"The question is, shall the Bill pass?"

After 3 to 5 minutes of discussion and debate, the Chair will call for the question and proceed with

the vote. "The question is, shall the Bill pass?" Those in favor say "aye." Those opposed, say "nay." (The Chair then declares the Bill passed or defeated.)

**Governor** candidates speak for 3 minutes on their "Legislative Agenda for the Student Legislature." A word of advice to Governor candidates – Avoid making "deals" with other Governor candidates to appoint each other to the Governor's Cabinet. Upon election, one may find that defeated officer candidates may not be the best person(s) to appoint. Don't get boxed in.

There is always an opportunity during the appointment period to appoint one or more defeated candidates if they apply and appear the best person(s) for the job.

**Voting Procedure**

A simple majority of these eligible votes determines the winning candidate.

**Officer**

Governor  
Lt. Governor Ohio only  
Clerk Chaplain  
Speaker  
resident  
Chief Justice

**Eligible to**

Legislators, Supreme Court Justices, Press, Lobbyists, Officers  
Legislators, Supreme Court Justices, Press, Lobbyists, Officers  
Legislators  
Members of the House  
Members of the Senate  
Supreme Court Justices

**Note** – In case of an office with only one candidate, voters mark their ballot with a "Yes" if they vote in favor of the candidate or write "No" if they oppose. Write in and unmarked ballots are not counted.

**Committee Chair & Vice Chair Qualifications & Responsibilities**

**Committee Chairs Qualifications**

- 1. Ideally, one year experience as a Legislative Delegate;
- 2. Know the procedure, implement, and engage all committee members;
- 3. Effective facilitating groups;
- 4. Participates on an intellectual and productive level;
- 5. Organized, keeps accurate records, works with Bill Coordinator and Committee Advisor, has excellent verbal and writing skills.

**Cannot be a Bill Partner with another Committee Chair or Vice Chair candidate.**

**Selection Procedure**

- 1. Candidates submit an application that is endorsed by their Advisor.
- 2. The Speaker and President may begin Committee Chair appointments during the Summer Summit, at YLA conferences and retreats. In the event that Chair positions are open after these times, YLA staff may make appointments.

**Opportunities to Learn and to Gain Leadership Experience as a Committee Chair**

- 1. Committee Chairs are invited and welcome to participate in the Summer Summit as well as YLA conferences and retreats for training, practice, relationship building with other students, and experience leading including leading committees.

Bill Rating/Officer Training/Committee Chair Training in February needs the active participation of Committee Chairs. This is the first time Committee Chairs get to see the student legislation proposed for the April YG. Committee Chairs also play a key role in setting the Legislative Calendar (determining when Bills are considered) by participating in the Bill Rating Process.

### **Responsibilities**

1. Prior to Youth in Government, study all Bills assigned to the Committee and review all Bills presented to YG. It is also helpful to contact the Bill Authors who will appear before the Committee, the Lobbyists, Cabinet members and Officers.
2. Represent the committee to the Bill Coordinator.
3. Carry out the Committee procedure.
4. Lead the Committee in active participation on the Floor in the debate on Bills referred by Committee. Get your Committee members to make the Committee's views known to all members during Floor sessions.

## **Committee Vice Chairs**

### **Qualifications**

- ◆ Able to preside in the absence of the Chair.

### **Selection**

- ◆ Senate Vice Chairs may be appointed prior to YG or may be appointed by a Committee Chair at YG if their Committee needs a Vice Chair. Not all Committees may have a Vice Chair. Chairs who may be away from their Committee may ask a Committee member to preside in their absence.

### **Responsibilities**

1. Serve as Clerk of the Committee.
2. Assist the Committee Chair.
3. Preside in the absence of the Chair. The Chair, Clerk or Vice Chair cannot be Legislative partners. Both cannot be absent from the Committee at the same time.

## **Youth Governor and Cabinet**

### **Governor's Cabinet**

The Governor appoints Cabinet members from those who meet the requirements for the office and who apply. Applications are accepted through the week after Youth in Government.

Cabinet members join the Governor and other officers at the June Leadership Summit at Horseshoe. The Officer Leadership Corps reviews the just completed Youth in Government, identifies improvements for the new year, train for their responsibilities and engage other students at the Summit in Youth in Government sessions so they will want to participate in YG as well as return home to encourage others to participate.

The Governor seeks the advice of the Cabinet as the Governor creates a Platform. At the end of the Summit the Governor assigns Cabinet members to head a department and/or area of interest (environment, economic development, safety, education, etc.). Cabinet members are then responsible to become expert in their area.

During the year, at YLA conferences and retreats and at Bill/Case Rating the Cabinet serves as resource persons in those interest areas plus advance the position of the Governor on the issues.

At Youth in Government the Cabinet represents the Governor's interests in Committees and with Legislators. Cabinet members listen to Committee hearings and floor debates in their area of interest, act as the Governor's advocate on related legislation, and report to and advise the Governor on legislation that reaches the Governor's desk.

Successful Cabinet members –

- ◆ Are informed in the areas they represent
- ◆ Understand the legislative process
- ◆ Have excellent people skills
- ◆ Can work on their own and as part of a team
- ◆ Are good listeners and good communicators
- ◆ Help Student Legislators, Lobbyists, Press, Page, and others succeed

## **Youth Chief Justice and Associate Justices**

### **Associate Justices**

The Chief Justice appoints Associate Justices from those who meet the requirements for the office and who apply. Applications are accepted through the week after Youth in Government. Associate Justices join the Chief Justice and other officers at the June Leadership Summit at Horseshoe. The Chief Justice and Associate Justices review the just completed Student Supreme Court, identify improvements for the new year, train for their responsibilities and engage other students at the Summit in a Supreme Court session so they will want to participate in the Student Supreme Court at YG as well as return home to encourage others to participate in the YG Judicial program.

During the year, at Fall Conference and at Case Rating the Associate Justices assist the Chief Justice in rating the cases for consideration at YG.

Successful Associate Justices –

- ◆ Understand the YG Judicial process
- ◆ Have excellent people skills
- ◆ Can work on their own and as part of a team
- ◆ Are good listeners and good communicators
- ◆ Help others succeed

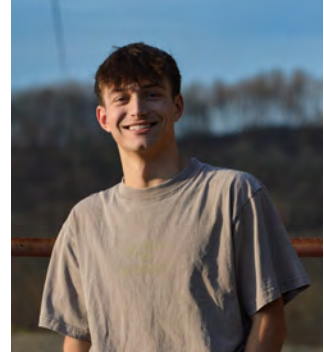




## **Luke Jolly - Jackson High School**

### **Previous Youth in Government participation (Years and position)**

Freshman - Legislative  
Sophomore - Committee Chair  
Junior - Speaker of the House



### **Qualifications for the office - What will you bring to the office?**

Communication, Leadership, Organization, Time-Management, Work-Ethic and Fairness

### **Style of Leadership and how it will help other delegates succeed**

I believe my most effective strength as a leader is communication. I prioritize assigning tasks to individuals best suited for them and ensure clear communication regarding objectives. I am open to the constructive criticism of others during all processes. This minimizes errors, unnecessary revisions, and the back-and-forth within tasks. This leadership style will allow more clarity and ensure all of my delegates understand and feel comfortable with the entire process.

### **School interests and activities**

Cross Country  
Track  
Quiz Bowl

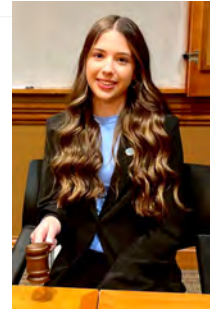
### **Community interests and activities**

YLA  
Leo's  
4-H  
NHS  
Student Council  
Student Health Council  
Interact  
YCAT  
My Brother's Buddy  
Drug-Free Clubs of America  
T.A.G.

### **An especially meaningful service experience.**

One of my most meaningful and memorable service experiences was counseling the special needs camp at my local 4-H camp. This was a 3-day camp, although they asked the counselors to come a night earlier to help clean and prepare for the camp. Allowing these campers to experience the outdoors, hike, swim, fish, and kayak helped me realize that only a few people can experience these things and that most of us take for granted. After this camp, I have become more self-aware and enhanced my leadership skills. Overall, this camp has made me a more empathetic, self-aware person.

2025 YLA Ohio Youth in Government  
Speaker of the House Candidate  
Haley Ross - Jackson High School



**Haley Ross - OH YG 2025 Speaker of the House Application Sketch**

**Previous Youth in Government Participation (Years and positions held)**

Freshman - Legislative  
Sophomore- Governor's Cabinet - Secretary of Tourism

**Qualification for the office - What will you bring to the office?**

I will bring leadership, time management, communication, dedication, work-ethic, accountability, and confidence.

**Style of leadership and how it will help other delegates to succeed**

For me, the most important style of leadership is accountability. I strongly believe in showing up and doing my part in whatever it is I have volunteered or been asked to do. I would like to be held accountable to any task I am required to complete, and do it to the best of my ability. This style of leadership will give delegates some to count on and allow them to feel comfortable with the process of Ohio Youth in Government.

**School Interests and Activities**

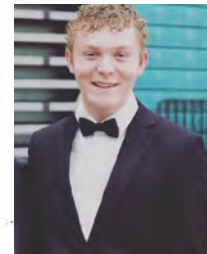
- Volleyball
- Youth Leadership Association
- Leo's Club
- Interact Club
- Student Council
- Student Health Council
- My Brother's Buddy
- Drug Free Clubs of America
- Southeast Ohio Model United Nations
- Fellowship of Christian Athletes Club
- T.A.G.

**Community Interests and Activities**

- 4-H
- Jackson County Junior Fairboard
- Camp Counseling
- Volunteering at Elevate Ministries
- Attending my youth group every sunday evening

**An especially meaningful service experience**

One of my most meaningful service experiences was having the opportunity to serve on the Jackson County Junior Fairboard. Although this is a seven day event, there are countless hours of fairground preparation, planning, and organizing that go on months before the fair. Being able to serve my community in this way means the world to me. I am able to help kids with their livestock and seeing them with a smile on their face after their hard work pays off is the most rewarding feeling. I also think that this experience has helped me grow as a person and as a leader. I had the opportunity to announce a livestock show in front of over 350 people. This whole experience has helped me show humility, become more confident in my speaking abilities, and helped me gain valuable leadership and life skills I will carry with me forever.



**Youth Leadership Association  
Running for Speaker of the House in Ohio's Student Legislature**

**Serving with Purpose: My Commitment to The Youth Leadership Association  
Kydin Whitmore**

As I stand on the threshold of leadership, I am propelled by a profound sense of purpose and a strong commitment to serving others. My journey in the Youth Leadership Association has been marked by meaningful experiences, unwavering dedication, and a deep-seated belief in the power of servant leadership.

My involvement in youth government, serving as a lobbyist during my sophomore year and as a house clerk in my junior year, has been heavily influential in shaping my understanding of leadership and advocacy. These roles have not only sharpened my communication and organizational skills but have also instilled in me a passion for enacting positive change within my community. As I set my sights on running for Speaker of the House in my upcoming senior year, I am driven by a desire to elevate the voices of my peers and champion.

Furthermore, my qualifications extend beyond my experiences in youth government. I have actively pursued opportunities for leadership development, including attending Horseshoe Camp for leadership training and participating in YLA meetings, and also the Fall Conference at Jackson's Mill. These experiences have not only equipped me with the necessary skills to lead effectively but have also deepened my commitment to the values sponsored by YLA. It has become a program that is very dear to my heart for all that it has done for me, taught me, and brought me to become who I am.

At the core of my leadership philosophy lies the principle of servant leadership. Leadership is not about asserting authority or seeking recognition but rather about selflessly serving others and empowering them to reach their full potential. By placing the needs of my peers at the prominent of my priorities and striving to ensure that their voices are heard and their concerns addressed, I aim to host a culture of collaboration, empathy, and mutual respect within the YLA.

In addition to my involvement in school activities such as Concessions, Quiz Bowl, Science Bowl, and various committees, my commitment to serving my community runs deep. From volunteering at Camp Horseshoe to participating in service projects such as Cave Lake Cleanup Day and the Walk to End Hunger, I have dedicated countless hours to making a positive impact in the lives of others. With over 1000 volunteer hours accumulated and an ongoing commitment to continuing my service in the future, I am deeply invested in giving back to my community and effecting meaningful change.

Moreover, my involvement in projects such as donations to our local dog shelter, organizing canned food drives, and participating in blood drives underscores my belief in the importance of

compassion, generosity, and collective action. These experiences have shaped me as a leader and instilled in me a profound sense of responsibility towards those in need.

As I embark on this next chapter of my leadership journey, I am humbled by the opportunity to serve as a beacon of hope, inspiration, and positive change within the YLA. With humility, integrity, and an unwavering commitment to service, I am ready to lead by example and empower others to do the same. Together, let us strive to make a difference, one act of service at a time.

I align myself with the five pillars of the Youth Leadership Association; Leadership, Character, Service, Entrepreneurship, and Philanthropy. I am confident in my ability to embody these values wholeheartedly. My leadership style, rooted in servant leadership, exemplifies my commitment to putting the needs of others first and empowering them to succeed. My unwavering integrity and dedication to service reflect the character traits that are central to the YLA's mission. Moreover, my experiences in community engagement and volunteering demonstrate my philanthropic mindset, as I actively seek out opportunities to make a tangible difference in the lives of others. I know that tomorrow's leaders start today, and I am ready to step up and lead the way toward a brighter future for all.



2025 Certification of Officer Nomination for Ohio Youth in Government

Instructions

2. Certify by signature of the Delegation Leader that -

- A. Nominees meet the qualifications for the office,
B. Nominees will participate on an intellectual and productive level in the performance of their duties including attendance for the total time at the programs required of Ohio YG Officers.
C. The nominee(s) have won the nomination of our local Delegation.

Please Type

Delegation Name \_\_\_\_\_ Delegation Leader \_\_\_\_\_

School \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_

Nominee Name

President of the Senate \_\_\_\_\_

Speaker of the House \_\_\_\_\_ Nominations Closed

Clerk (Specify House or Senate) \_\_\_\_\_

Chaplain (Specify House or Senate) \_\_\_\_\_

Lt. Governor \_\_\_\_\_

Governor \_\_\_\_\_ Nominations Closed

Chief Justice \_\_\_\_\_

Must be in the Judicial Program to run for Chief Justice.

It is YLA policy that an officer who does not participate in the Leadership Summit at Horseshoe in June will be removed from office since they are not there to perform their duties. The newly-appointed officer would then complete the term of office through the April YG Conference.



2025 Officer Nomination Form - Ohio Youth in Government  
 Each Nominee Completes and Submits this form by 6:00 pm  
 on Fri. April 12, 2024 at OH YG to the Bill Coordinator

Nominee Name \_\_\_\_\_ Office Seeking \_\_\_\_\_  
 Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_  
 Zip \_\_\_\_\_ Cell Phone \_\_\_\_\_ Home Phone \_\_\_\_\_  
 Email \_\_\_\_\_  
 Delegation \_\_\_\_\_ School \_\_\_\_\_

*Answer these questions (Attach additional sheet)*

1. Past Youth in Government participation (years and position);
2. Qualifications for the office - what do you bring to the office?
3. Style of Leadership and how it will help other delegates succeed;
4. School interests and activities;
5. Community interests and activities;
6. An especially meaningful service experience.

It is YLA policy that an officer who does not participate in the Leadership Summit at Horseshoe in June will be removed from office since they are not there to perform their duties. The newly-appointed officer would then complete the term of office through the April YG Conference.

I attest that this information is true and accurate to the best of my knowledge and that if elected I will carry out my responsibilities as outlined in the manual.

I have spoken with my parents about the responsibilities, time, commitments, and that if elected my first responsibility is **mandatory participation in the June 16 -22, 2024 Leadership Summit at Horseshoe**. My parents understand and support me and the responsibilities of office.

Signature \_\_\_\_\_ Date \_\_\_\_\_  
 Student Candidate

This delegate has the qualifications for this office and has my support.

Signature \_\_\_\_\_ Date \_\_\_\_\_  
 Advisor/Delegation Leader



Application for 2025 Ohio YLA Youth in
Government Governor's Cabinet
Submit no later than April 22nd

Applicant's Name: \_\_\_\_\_ Delegation: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_

Zip \_\_\_\_\_ Cell Phone \_\_\_\_\_ Home Phone \_\_\_\_\_

Email \_\_\_\_\_

Year of Graduation \_\_\_\_\_

Previous Youth in Government Experience (list years and position): \_\_\_\_\_

Explain how your leadership style, experience, commitment, time, and ideas for and about Youth in Government qualify you for this position. Attach an additional sheet with your answers as needed.

If appointed a Cabinet Member, by the Governor, I will carry out my responsibilities to prepare, lead, and strengthen YG by my service, example, and commitment. I will accept my responsibility to begin my service by actively participating in YLA's annual Leadership Summit at Camp Horseshoe this June 16-22, 2024. I understand and accept that if I do not participate in the total 6-day Summit my office becomes vacant. Another person at the Summit will be appointed to the position. If no one can accept the duties of the position, it may remain vacant.

I will not seek or accept this position if I cannot attend the total June 16-22, 2024, Summit. If appointed to the position, I will not ask to be excused from all or part of the Summit.

Applicant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

I support this application and understand the responsibilities expected of a Cabinet member.

Parent's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Advisor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Return application to Ohio Youth in Government, Youth Leadership Association, 522 Sandhill Road, Pt. Pleasant, WV 25550 Phone (304) 675-5899







Application for 2025 Ohio YLA Youth in Government Associate Justice

Submit no later than April 22<sup>nd</sup>

Applicant's Name: \_\_\_\_\_ Delegation: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_

Zip \_\_\_\_\_ Cell Phone \_\_\_\_\_ Home Phone \_\_\_\_\_

Email \_\_\_\_\_

Year of Graduation \_\_\_\_\_

Previous Youth in Government Experience (list years and position): \_\_\_\_\_

Explain how your leadership style, experience, commitment, time, and ideas for and about Youth in Government qualify you for this position. Attach an additional sheet with your answers as needed.

If appointed an Associate Justice, by the Chief Justice, I will carry out my responsibilities to prepare, lead, and strengthen YG by my service, example, and commitment. I will accept my responsibility to begin my service by actively participating in YLA's annual Leadership Summit at Camp Horseshoe this June 16-22, 2024. I understand and accept that if I do not participate in the total 6-day Summit my office becomes vacant. Another person at the Summit will be appointed to the position. If no one can accept the duties of the position, it may remain vacant.

I will not seek or accept this position if I cannot attend the total June 16-22, 2024, Summit. If appointed to the position, I will not ask to be excused from all or part of the Summit.

Applicant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

I support this application and understand the responsibilities expected of an Associate Justice.

Parent's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Advisor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Return application to Ohio Youth in Government, Youth Leadership Association, 522 Sandhill Road, Pt. Pleasant, WV 25550 Phone (304) 675-5899





Application for 2025 Ohio YLA Youth in Government Committee Chair

Submit no later than May 12th

Delegation Name \_\_\_\_\_

Name \_\_\_\_\_ Email \_\_\_\_\_

Address \_\_\_\_\_ County \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Cell Phone \_\_\_\_\_ Home Phone \_\_\_\_\_ Grad Year \_\_\_\_\_

Email \_\_\_\_\_

My previous Youth in Government Participation (years and position) include:

I am qualified to be a Committee Chair because:

I will help the Committee be a successful experience to all members and those who appear before the Committee by:

*If selected I will make every effort to participate in the June Leadership Summit at Horseshoe and the Fall Conference. I will participate in the Bill Rating/Training in Columbus in February.*

Parent's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Advisor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

On other side, this application, the Delegation explains why they so or do not support this application for Committee leadership. The explanation is to be signed by your Advisor.

**Return application to Youth in Government, Horseshoe Leadership Center,**

**3309 Horseshoe Run Road, Parsons, WV 26287 Phone: 304-478-2481**





Application for 2025 Ohio YLA Youth in Government Press Editor

Submit no later than May 12th

Applicant's Name: \_\_\_\_\_ Delegation: \_\_\_\_\_
Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_\_
Zip \_\_\_\_\_ Cell Phone \_\_\_\_\_ Home Phone \_\_\_\_\_
Email \_\_\_\_\_ Year of Graduation \_\_\_\_\_
Previous Youth in Government Experience (list years and position): \_\_\_\_\_

Explain how your leadership style, experience, commitment, time, and ideas for and about Youth in Government qualify you for this position. Include any experience you have in writing and with a newsletter or other publication. Attach an additional sheet with your answers as needed.

If appointed Press Editor, I will carry out my responsibilities as outlined above.

Applicant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

I support this application and understand the responsibilities expected of a Cabinet member.

Parent's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Advisor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Return application to Youth in Government, Horseshoe Leadership Center, 3309 Horseshoe Run Road, Parsons, WV 26287 Phone (304) 478-2481



# ENTREPRENEURSHIP SUMMIT at CAMP HORSESHOE June 9-15, 2024



Entrepreneurship Leadership Service Philanthropy Character



- Meet real-life entrepreneurs
- Learn the secrets of success in business
- Team-building leadership adventures
- Learn from a panel of entrepreneurship experts
- Explore the outdoors
- Best food of your life!
- Connect with teens from across the state
- Get ideas to help your community

### Who is Eligible?

ANY rising 9th–12th grade students who want to learn, participate and build their futures are eligible.

### Scholarships

Students, parents, or local sponsors may pay the total fee or a student may apply for a scholarship provided by business, industry, civic groups, foundations, individuals, and others.

### Getting Down to Business!

Learn by doing with other teens, college age counselors, business people, entrepreneurs, and others engaging in the principles of business and entrepreneurship.

### Leadership

Practice skills of organization to get things done, communication, teamwork, and how to help groups succeed through effective governance.

### Friendship!

You'll make friends for a lifetime with people who care, listen, and encourage you.

### Fun!

Be ready for days full of great times in active learning sessions with plenty of time for recreation, sports, music, the great outdoors, campfires, Variety Show, swimming, and much more!

### Service

You'll experience the value of doing good things for others, how to improve your school and community, and basically how to build a better world.

### Arrival/Departure

Sunday 2 pm to Saturday 9 am. Only register if you can and will attend for the total time.

### To Register

Register online at:  
[Ylaleads.org](http://Ylaleads.org)

or mail registration form to:

Entrepreneurship Summit  
Horseshoe Leadership Center  
3309 Horseshoe Run Road  
Parsons, WV 26287

### Dare to Make a Difference—

Learn the basics of entrepreneurship by creating your own business from the ground up with a team of peers!

We'll learn the basics of starting a business, discover an entrepreneurial mindset, build community, make connections with teens from across the state, and learn how to make a difference for good at home, school, and beyond.

Invest one week at Horseshoe and you'll gain skills, friendships, and memories to last a lifetime.



# Teens tell their friends why they should attend Entrepreneurship Summit



"I was sponsored by my local service club to attend camp. I am thankful to have this opportunity to connect with so many West Virginia Entrepreneur's and peer entrepreneur's. This was a great experience.

—A Happy Camper

"This was my first time at a summer camp. I had so much fun. I made so many new friends and had so many new experiences. I am not typically an outgoing person, but I got really out of my comfort zone this week. I also learned many things about entrepreneurship. We did a simulation marketplace where we had to build a business from the ground up. I really enjoyed it. We also went on a field trip and learned many things from local entrepreneurs." - Lelia Brock, Williamson, WV, Mingo Central High School

## HIGHLIGHTS:

- Marketplace Simulation with business professionals
- Field trip touring industries and small businesses in historic Davis and Thomas, WV
- The Incredible Journey
- Variety Show
- Campfires
- Home-cooked meals
- Cabin living
- Swimming
- Hikes
- Hands-on workshops
- Outdoor Challenge Course
- Nature exploration
- Tour Blackwater Falls State Park
- Create a business idea and redesign a community
- Service projects
- Introduction to Youth in Government, Model United Nations, and other YLA programs
- Dancing
- Sports
- Music
- Special Interest Time
- Fun, Friends, Learning!



West Virginia DEPARTMENT OF EDUCATION





47th Annual
Teen Entrepreneurship Summit
Horseshoe Leadership Center
June 9-15, 2024

To be completed by Student

Name \_\_\_\_\_ Home Phone \_\_\_\_\_ County \_\_\_\_\_
Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_
Age \_\_\_\_\_ Date of Birth \_\_\_\_\_ Male Female Grade in Fall \_\_\_\_\_
Camper E-mail \_\_\_\_\_ Campers Cell Phone \_\_\_\_\_ School in Fall \_\_\_\_\_
Parent 1 Name \_\_\_\_\_ Parent 2 Name \_\_\_\_\_
Parent 1 Cell Phone & E-mail \_\_\_\_\_ Parents 2 Cell Phone & E-mail \_\_\_\_\_
Place of employment \_\_\_\_\_ Place of employment \_\_\_\_\_
Telephone (for emergency) \_\_\_\_\_ Telephone (for emergency) \_\_\_\_\_

Name & E-Mail Address of Local Newspaper (we try to recognize all participants with news releases)

Affirmative Action Survey: Funding agencies require periodic report on the sex, ethnicity, and disability status of the applicants. This data is for analysis and affirmation action only. Submission of this information is voluntary. Check all that apply:

\_\_\_ American Indian/Alaska Native \_\_\_ Asian \_\_\_ Black or African American
\_\_\_ Hispanic or Latino \_\_\_ White \_\_\_ Native Hawaiian or Other Pacific Islander

- 1. Fee Per Student: \$320 when paid by May 15 \$365 when paid After May 15
Note: Each session is limited to no more than eighty (80) male and eighty (80) female. Register early to secure a place.

(Teen Entrepreneurship Summit has scholarships available, WV student pays just \$75, and has section 5 completed.)

Payment: \_\_\_ Check enclosed\* \_\_\_ Master Card \_\_\_ Discover \_\_\_ VISA Amount Paid \$ \_\_\_\_\_
Card # \_\_\_\_\_ Exp. Date \_\_\_\_\_
Card Holder Signature \_\_\_\_\_ Date \_\_\_\_\_

\* make check payable to "YLA". All payments must be received at the Horseshoe office on or before May 15th to receive the discount, this includes those filling electronically.

- 2. If part or all of your fee is paid to Horseshoe by a local sponsor, please list them here:

Name of Service Club, or other group \_\_\_\_\_
Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_
Contact Person for this group \_\_\_\_\_ Phone \_\_\_\_\_
Amount paid to Horseshoe \$ \_\_\_\_\_

## Horseshoe Is For Teens Who Are

- Interested in learning and developing social, civic, leadership, service, entrepreneurial skills;
- Positive in meeting and working with others, participating, helping others and groups succeed;
- Doers – who do their part to keep a place and activities clean, safe and positive for others;
- Ready to live away from home with more than 100 teens, to step out of their daily routine into a new world of activities and experiences;
- Committed to building real relationships by "unplugging" from the virtual world to meet face- to-face with other teens and adults without the distractions of the electronic world (cell phones, internet, television, etc.).
- Able to be a key part of the **week's** success in the lives of others and to take **what's** learned home to make their homes, schools, organizations and communities better places for all.

### 3. Agreements

I attest that if my application to attend is accepted, I will attend the total Summit beginning Sunday afternoon and ending after breakfast on Saturday. I will not ask to come later or leave early. I will not take the place of a person who can attend the whole week so I can be accommodated for only part of the week.  YES  NO

X \_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Date

I support my **son/daughter's application** and participation in this program at Horseshoe. I certify they are free of habits or attitudes that would make them a negative participant and that my child is amenable to positive group life in a camp setting. I authorize Horseshoe (Ohio-West Virginia Youth Leadership Association) to have and use the name, photographs, slides, digital images, or video tape of the person named on this application as may be needed for its records or public relations programs including its web site and news releases.  YES  NO

X \_\_\_\_\_  
Parent/Guardian Signature

\_\_\_\_\_  
Date

### 4. Reference for Financial Aid

Students seeking financial aid from Horseshoe, please have the School Principal or Designated School Official sign this reference.

This student has shown interest in this program and is capable of positively participating in a week-long residential program. I support their application without any reservation.

X \_\_\_\_\_  
Principal/Official Signature

\_\_\_\_\_  
School

\_\_\_\_\_  
Date

### 5. Send completed application to:

Teen Entrepreneurship Summit  
Horseshoe Leadership Center  
3309 Horseshoe Run Road  
Parsons, WV 26287-9029  
Phone - 304-478-2481  
Fax - 304-478-4446

To make Horseshoe affordable to as many as possible, Horseshoe fees are about one-half of our actual costs. The total fee of \$365 is reduced to \$320 for those who pay the total amount by May 15. Refunds: \$75 of the fee reserves a place and is for administrative/processing expenses. IT IS NOT REFUNDABLE OR TRANSFERABLE. The balance of the fee may be refunded if Horseshoe is notified in writing two weeks prior to the camp week.



# LEADERSHIP SUMMIT

## at CAMP HORSESHOE

### June 16-22, 2024



Character • Leadership • Service • Entrepreneurship • Philanthropy

**JOIN US THIS  
SUMMER AT  
CAMP HORSESHOE  
FOR AN  
UNFORGETTABLE  
WEEK!**



- ◆ *Brainstorm and network with youth from across Ohio and West Virginia*
- ◆ *Practice skills for Youth in Government and Model United Nations*
  - ◆ *Strengthen connections and friendships*
  - ◆ *Team-building leadership adventures*
    - ◆ *Explore the great outdoors*
    - ◆ *Best food of your life!*
- ◆ *Get ideas to help your community, school, and local YLA chapter*

### Prepare for Success —

Gather with youth leadership officers, interested teens, and other service-minded people to make a real difference for good. Discover your potential by expanding your mind and developing skills for leadership success. Plus, learn how to lead your student groups with excellence. Invest one week at Horseshoe and you'll gain skills, friendships, adventures, and memories to last a lifetime.



#### Who is Eligible?

ANY rising 9th– 12th grade students who want to learn, participate and build their futures are eligible.

#### Scholarships

Students, parents, community organizations, or local sponsors may pay the total fee OR individual YLA chapters can organize fundraising events to help their members participate.

#### Leadership

Practice skills of organization to get things done, communication, teamwork, and how to help groups succeed through effective governance.

#### Friendship!

You'll make friends for a lifetime with people who care, listen, and encourage you.

#### Fun!

Be ready for days full of great times in active learning sessions with plenty time for recreation, sports, music, the great outdoors, campfires, Variety Show, creek exploring , and much more!

#### Service

You'll experience the value of doing good things for others, how to improve your school and community, and basically how to build a better world.

#### Arrival/Departure

Sunday 2 pm to Saturday 9 am. Only register if you can and will attend for the total time.

#### To Register:

Register online at:  
[www.ylaleads.org](http://www.ylaleads.org)

or mail registration form to:

Leadership Summit  
Horseshoe Leadership  
Center  
3309 Horseshoe Run Road  
Parsons, WV 26287-9029



# Here's why teens say "You've got to get to Horseshoe!"

"Leadership camp is an amazing way to spend a week of your summer. You get to meet so many people who will become lifelong friends and you get to make so many memories you can cherish forever. You are pushed to try new things and you leave a better person than you came. You don't want to miss the opportunity!"

Lele Brock—Chapter President—Tug Valley Chamber of Commerce

Leadership camp was a positive experience that helped me make connections and make new friends with other YLA members from around the state and even Ohio! Nothing is better than looking up at the stars with your new friends at camp!

Lauren Rice—John Marshall High School



## HIGHLIGHTS:

- Youth Officer planning sessions
- Keynote speakers
- Variety Show
- Campfires
- Home-cooked meals
- Cabin living
- Creek exploring
- Hikes
- Hands-on workshops
- Outdoor Challenge Course
- Nature exploration
- Service projects
- Team building adventures
- Youth in Government
- Model United Nations
- How to start a YLA chapter
- Community action ideas
- Dance
- Sports
- Music
- Goal Setting
- Camp Traditions
- Special Interest Time
- Fun, Friends, Learning!



West Virginia DEPARTMENT OF  
EDUCATION



Teen Leadership Summit
Horseshoe Leadership Center
June 16 - 22, 2024

1. To be completed by Student

Name \_\_\_\_\_ Home Phone \_\_\_\_\_ County \_\_\_\_\_
Mailing Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_
Age \_\_\_\_\_ Date of Birth \_\_\_\_\_ \_\_\_ Male \_\_\_ Female Grade in Fall \_\_\_\_\_
Camper E-mail \_\_\_\_\_ Cell Phone \_\_\_\_\_ School in Fall \_\_\_\_\_
Are you in a YLA group or HI-Y? \_\_\_ Y \_\_\_ N Group Name \_\_\_\_\_
Parent 1 Name \_\_\_\_\_ Parent 2 Name \_\_\_\_\_
Parent 1 Cell Phone & E-mail \_\_\_\_\_ Parent 2 Cell Phone & E-mail \_\_\_\_\_
Place of employment \_\_\_\_\_ Place of employment \_\_\_\_\_
Telephone (for emergency) \_\_\_\_\_ Telephone (for emergency) \_\_\_\_\_
Name & E-Mail Address of Local Newspaper (we try to recognize all participants with news releases)

Affirmative Action Survey: Funding agencies require periodic report on the sex, ethnicity, and disability status of the applicants. This data is for analysis and affirmation action only. Submission of this information is voluntary. Check all that apply:
\_\_\_ American Indian/Alaska Native \_\_\_ Asian \_\_\_ Black or African American
\_\_\_ Hispanic or Latino \_\_\_ White \_\_\_ Native Hawaiian or Other Pacific Islander

2. Fee Per Student: \$320 when paid by May 15 \$365 when paid After May 15
Note: Each session is limited to no more than eighty (80) male and eighty (80) female. Register early to secure a place.

Payment: \_\_\_ \*Check enclosed \_\_\_ Master Card \_\_\_ Discover \_\_\_ VISA Amount Paid \$ \_\_\_\_\_
\* make check payable to OH-WV YLA. All payments must be received at the Horseshoe office on or before May 15th to receive the discount, this includes those filling electronically.
Now charging 3% convenience fee for all credit card transactions starting January 1st 2023.

Card # \_\_\_\_\_ Exp. Date \_\_\_\_\_
Card Holder Signature \_\_\_\_\_ Date \_\_\_\_\_

3. If part or all of your fee is paid to Horseshoe by a local sponsor, please list them here:

Name of Service Club, or other group \_\_\_\_\_
Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_
Contact Person for this group \_\_\_\_\_ Phone \_\_\_\_\_
Amount paid to Horseshoe \$ \_\_\_\_\_.

(Please complete the other side of this form.)

## Horseshoe Is For Teens Who Are

- Interested in learning and developing social, civic, leadership, service, entrepreneurial skills;
- Positive in meeting and working with others, participating, helping others and groups succeed;
- Doers – who do their part to keep a place and activities clean, safe and positive for others;
- Ready to live away from home with more than 100 teens, to step out of their daily routine into a new world of activities and experiences;
- Committed to building real relationships by "unplugging" from the virtual world to meet face- to-face with other teens and adults without the distractions of the electronic world (cell phones, internet, television, etc.).
- Able to be a key part of the **week's** success in the lives of others and to take **what's** learned home to make their homes, schools, organizations and communities better places for all.

### 4. Agreements

I attest that if my application to attend is accepted, I will attend the total conference beginning Sunday afternoon and ending after breakfast on Saturday. I will not ask to come later or leave early. I will not take the place of a person who can attend the whole week so I can be accommodated for only part of the week.  YES  NO

\_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Date

I support my **son/daughter's application** and participation in this program at Horseshoe. I certify they are free of habits or attitudes that would make them a negative participant and that my child is amenable to positive group life in a camp setting. I authorize Horseshoe (Ohio-West Virginia Youth Leadership Association) to have and use the name, photographs, slides, digital images, or video tape of the person named on this application as may be needed for its records or public relations programs including its web site and news releases.  YES  NO

\_\_\_\_\_  
Parent/Guardian Signature

\_\_\_\_\_  
Date

### 5. Send completed application to:

Horseshoe Leadership Center  
3309 Horseshoe Run Road  
Parsons, WV 26287-9029  
Phone (304) 478-2481

To make Horseshoe affordable to as many as possible, Horseshoe fees are about one-half of our actual costs. The total fee of \$365 is reduced to \$315 for those who pay the total amount by May 15. Refunds: \$75 of the fee reserves a place and is for administrative/processing expenses. IT IS NOT REFUNDABLE OR TRANSFERABLE. The balance of the fee may be refunded if Horseshoe is notified in writing two weeks prior to the camp week.



Horseshoe Leadership Center, a partner with the Monongahela National Forest and USDA, is an equal opportunity provider and employer.



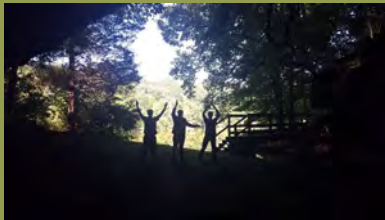
# YLA Ohio Cave Lake Center for Community Leadership

1132 Bell Hollow Road, Latham, Ohio



## Nature's Classroom

730 plus acres ~ 42-acre lake ~  
 Frost Cave ~ 150 species of  
 birds ~ 160 species of trees and  
 shrubs ~ 360 species of  
 blooming plants ~ rare plants  
 including *Sullivantia sullivantii*







# DOWNTOWN HOTELS AND DINING MAP



## DOWNTOWN HOTELS

- A. Moxy Columbus Short North
- B. Graduate Columbus
- C. Le Méridien Columbus, The Joseph

- D. AC Hotel Columbus Downtown
- E. Hampton Inn & Suites Columbus Downtown
- F. Hilton Columbus Downtown
- G. Hyatt Regency Columbus
- H. Drury Inn & Suites Columbus Convention Center

- I. Sonesta Columbus Downtown
- J. Canopy by Hilton Columbus Downtown Short North
- K. Red Roof PLUS+ Columbus Downtown - Convention Center

## SHORT NORTH ARTS DISTRICT

- 1. Stauf's Coffee Roasters.....\$ B
- 2. Condado Tacos .....\$ LD
- 3. Service Bar / Middle West Spirits.....\$\$\$ D
- 4. Brothers Drake Meadery & Bar
- 5. BrewDog Short North.....\$\$ D
- 6. Goody Boy Diner.....\$\$ LD
- 7. Bristol Republic.....\$ D
- 8. Fours on High.....\$ D
- 9. Standard Hall.....\$ D
- 10. Seventh Son Brewing.....\$ D
- 11. Budd Dairy Food Hall.....\$ D
- 12. Fox in the Snow Cafe.....\$ BL
- 13. Bodega.....\$ D
- 14. Northstar Cafe.....\$ BLD
- 15. Oddfellows Liquor Bar.....\$ D
- 16. Mikey's Late Night Slice.....\$ D
- 17. Julep.....\$ D
- 18. Fireproof Short North.....\$ D
- 19. Donatos.....\$ LD
- 20. Black Brick Bar
- 21. Icarus Sandwiches.....\$ BL
- 22. Roaming Goat Coffee.....\$
- 23. Hubbard Grille.....\$
- 24. Galla Park Steak.....\$\$\$ D
- 25. Wine on High
- 26. Mandrake Rooftop Bar.....
- 27. TownHall.....\$ LD
- 28. The Eagle.....\$ LD
- 29. **Union Cafe**.....\$ LD
- 30. Short North Pint House.....\$ D
- 31. Basi Italia.....\$\$\$ D
- 32. Short North Piece Of Cake.....\$
- 33. The Lox Bagel Shop.....\$\$ BL
- 34. One Line Coffee.....\$ B
- 35. Boston Stoker.....\$\$
- 36. Bakersfield.....\$ LD
- 37. Shake Shack.....\$ LD
- 38. Forno Kitchen + Bar.....\$ D
- 39. Jeni's Splendid Ice Creams\$\$
- 40. Lincoln Social Rooftop.....\$ D
- 41. Del Mar SoCal Kitchen.....\$\$\$ D
- 42. Brassica.....\$ LD
- 43. The Pearl.....\$ D
- 44. The Guild House.....\$\$\$ BLD
- 45. Soul at The Joseph.....\$ BLD
- 46. Marcella's.....\$ D
- 47. Hyde Park Prime Steakhouse.....\$\$\$\$ D
- 48. Ginger Rabbit Jazz Lounge
- 49. Convention Center: American Nut Company, Charley's Philly Steaks, Chicken 'n Eggs, Fame's Diner, J's Sweet Treats, Jet's Pizza, Mykonoas Gyros, Siam/Ohio Noodles & Sushi, Starbucks, Subway, Velvet Café & Ice Cream.....\$ BLD
- 50. Ruth's Chris Steak House.....\$\$\$ D
- 51. Novak's Tavern & Patio and Parlay Sporting Club and Kitchen.....\$ D
- 52. Parlay Sporting Club
- 53. Brewcadia.....\$ D
- 54. Barley's Brewing Company\$\$ LD
- 55. Denmark.....\$ D
- 56. Martini Modern Italian.....\$\$\$ D

## ARENA DISTRICT

- 1. North Market: American Nut, Jeni's Splendid Ice Creams, Stauf's Coffee Roasters, Hot Chicken Takeover, Dos Hermanos.....\$ BLD
- 2. Lumin Sky Bar & Kitchen...\$\$ D
- 3. Moran's Bar and Grill.....\$ LD
- 4. Granero.....\$ D
- 5. Goodwood Brewing.....\$ LD
- 6. **Whistle & Keg**.....\$
- 7. Nada Restaurant.....\$ D
- 8. Sunny Street Café.....\$ BL
- 9. Boston's Gourmet Pizza.....\$ LD
- 10. Ted's Montana Grill.....\$ LD
- 11. Zoup!.....\$ LD
- 12. Rodizio Grill.....\$\$\$ D
- 13. bd's Mongolian Grill.....\$ LD
- 14. Goodale Station.....\$\$\$ D
- 15. Jeff Ruby's Steakhouse.....\$\$\$\$ D

Download the Attendee Savings Pass for deals and discounts:

**Icon Key:** ● = Bar Only ● = Patio ● = Rooftop. **BLD** = On weekdays, regularly serves: Breakfast (B), Lunch (L), Dinner (D). **Average entrée price:** \$ = Under \$10, \$\$ = \$10-\$30, \$\$\$ = \$31-\$60, \$\$\$\$ = above \$61. Restaurant hours vary. Businesses listed represent partners of Experience Columbus. **Bold** denotes Attendee Savings Pass participants.





## DOWNTOWN HOTELS

- L. Courtyard by Marriott Columbus Downtown
- M. Residence Inn by Marriott Columbus Downtown
- N. Hotel LeVeque, Autograph Collection

- O. Renaissance Columbus Downtown Hotel
- P. DoubleTree Suites by Hilton Hotel Columbus Downtown
- Q. Sheraton Columbus at Capitol Square
- R. Holiday Inn Columbus Downtown Capitol Square

- S. Home2 Suites by Hilton Columbus Downtown
- T. The Westin Great Southern Columbus
- U. Holiday Inn Express Columbus Downtown
- V. German Village Inn

# DOWNTOWN HOTELS AND DINING MAP



## DOWNTOWN

- |  |           |  |          |
|--|-----------|--|----------|
| 1. Stauf's Coffee Roasters.....\$      | B         | 12. Jeni's Splendid Ice Creams .\$\$   |          |
| 2. Jet's Pizza .....                   | \$\$      | 13. Milestone 229 .....                | \$\$ LD  |
| 3. Wolf's Ridge Brewing.....\$\$       | LD        | 14. Dirty Frank's Hot Dog Palace ..... | \$ LD    |
| 4. Briosco Coffee .....                | \$ BL     | 15. Hadley's Bar and Kitchen ...       | \$\$ LD  |
| 5. Due Amici.....                      | \$\$ LD   | 16. Mikey's Late Night Slice.....      | \$ LD    |
| 6. Mitchell's Steakhouse .....         | \$\$\$ LD | 17. Donatos .....                      | \$\$ LD  |
| 7. <b>Barlucio</b> .....               | \$ LD     | 18. Pecan Penny's.....                 | \$\$ LD  |
| 8. The Keep Kitchen & Liquor Bar ..... | \$\$ BLD  | 19. The Walrus.....                    | \$\$ LD  |
| 9. Zoup! .....                         | \$ LD     | 20. Dempsey's Food and Spirits .....   | \$\$ BLD |
| 10. BurgerIM.....                      | \$\$ LD   |  |          |
| 11. Condado Tacos .....                | \$ LD     |  |          |



## FRANKLINTON

- |                                     |         |                                    |         |
|-------------------------------------|---------|------------------------------------|---------|
| 1. Bottoms Up Coffee .....          | \$ BL   | 4. Strongwater Food & Spirits..... | \$\$ LD |
| 2. Land-Grant Brewing Company ..... | \$\$ D  | 5. One Line Coffee.....            | \$      |
| 3. BrewDog Franklinton.....         | \$\$ LD |                                    |         |



## GERMAN VILLAGE/BREWERY DISTRICT

- |   |           |   |           |
|---|-----------|---|-----------|
| 1. Katzinger's Delicatessen ....            | \$\$ L    | 14. Schmidt's Sausage Haus und Restaurant.....    | \$\$ LD   |
| 2. Kittie's Cakes .....                     | \$\$ BL   | 15. Barcelona Restaurant & Bar .....              | \$\$\$ LD |
| 3. Pistacia Vera.....                       | \$\$ BL   | 16. Skillet.....                                  | \$        |
| 4. Matt and Tony's Wood Fired Kitchen ..... | \$\$ D    | 17. Winans Chocolates + Coffees .....             | \$\$      |
| 5. Lindey's .....                           | \$\$\$ LD | 18. Jeni's Splendid Ice Creams .                  | \$\$      |
| 6. Parsons North Brewing .....              | \$\$ D    | 19. Big Room Bar.....                             | \$        |
| 7. Stauf's Coffee Roasters.....             | \$ B      | 20. Community Grounds: Coffee & Meeting House.... | \$ BL     |
| 8. Sycamore .....                           | \$\$ BLD  | 21. The Thurman Cafe.....                         | \$\$ LD   |
| 9. Antiques on High .....                   | \$\$      |   |           |
| 10. Law Bird .....                          | \$\$      |   |           |
| 11. Emmett's on South High....              | \$ BL     |   |           |
| 12. Smoked on High Barbecue. \$             | LD        |   |           |
| 13. Chapman's Eat Market.....               | \$\$ D    |   |           |

View the interactive map for more dining options:



**Icon Key:** ● = Bar Only ● = Patio ● = Rooftop BLD = On weekdays, regularly serves Breakfast (B), Lunch (L), Dinner (D). **Average entrée price:** \$ = Under \$10, \$\$ = \$10-\$30, \$\$\$ = \$31-\$60, \$\$\$\$ = above \$61. Restaurant hours vary. Businesses listed represent partners of Experience Columbus. **Bold** denotes Attendee Savings Pass participants.