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OPINION, U.S. COURT OF APPEALS FOR THE SIXTH CIRCUIT (AUGUST 21, 2026)

FILED
Aug 21, 2026
Kelly L. Stephens, Clerk

NOT RECOMMENDED FOR PUBLICATION

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

ALI PASCAL MAHVI,

Plaintiff-Appellant,

v.

GEAUGA COUNTY, OH JOBS AND FAMILY SERVICES, ET AL.,

Defendants-Appellees.

No. 25-3469

On Appeal from the United States District Court for the Northern District of Ohio

Before: NORRIS, STRANCH, and MATHIS, Circuit Judges.

ORDER

Ali Pascal Mahvi, proceeding pro se, appeals a district court judgment dismissing his civil rights suit filed under 42 U.S.C. §§ 1981, 1983, and 1985 as untimely. This case has been referred to a panel of the court that, upon examination, unanimously agrees that oral argument is not needed. *See* Fed. R. App. P. 34(a)(2). For the reasons below, we affirm.

Mahvi initiated this suit through counsel on July 2, 2024. When he amended his complaint as a matter of course, the amended complaint became the operative pleading. The amended complaint identified the defendants as the Geauga County, Ohio Jobs and Family Services (OJFS) and its fraud investigator, Karen Sweet; Tegna, Inc., dba WKYC-TV, and its former investigative reporter, Tom Meyer; and the Geauga County Commissioners. Mahvi alleged that he and his family received public assistance benefits provided by OJFS between 2013 and 2017. In 2016, Sweet began investigating Mahvi for fraud and prepared an affidavit to obtain a search warrant for Mahvi's home. Sweet also prepared a report identifying Mahvi's "race and ethnicity as an Iranian citizen" without reviewing his case file to see that he identified himself as a United States citizen with supporting documentation. On September 2, 2016, Mahvi's home was searched and evidence seized. Meyer was present with a cameraman when the search warrant was executed, and in Meyer's report, he made "prejudicial and defamatory statements describing [Mahvi] as an 'Iranian, Muslim, and Royalty.'" Meyer and WKYC-TV continued to cover Mahvi's fraud investigation in additional broadcasts. Mahvi was ultimately convicted

and sentenced for financial crimes in 2017 but maintains his innocence.

Mahvi claimed that the defendants violated his rights under (1) § 1983 based on their description of him as an "Iranian, Muslim, Royalty" despite their knowledge that he is a United States citizen; (2) § 1981 based on their interference with his public assistance benefits; and (3) § 1985 based on their conspiracy to interfere with his public assistance benefits. He sought a new criminal trial. Mahvi asserted that, to the extent his claims were untimely, equitable tolling should apply.

The defendants moved to dismiss the amended complaint under Federal Rule of Civil Procedure 12 (b)(6) based on untimeliness and other grounds. Mahvi opposed the motions. The district court granted the defendants' motions. Addressing only timeliness, the district court found that all of Mahvi's claims were time-barred and that there was no basis for equitable tolling. The district court further concluded that any potential claims against the county commissioners who had not been served were subsumed within the dismissal of the amended complaint as time-barred.

Now proceeding pro se, Mahvi argues that equitable tolling applies. Mahvi also argues the merits of his underlying claims and challenges his criminal convictions. Mahvi filed a motion "to apply the exhaustion of administrative remedies," which we construe as a reply brief.

We review de novo the district court's dismissal of a complaint under Rule 12(b)(6) as time-barred. *Wershe v. City of Detroit,* 112 F.4th 357, 365 (6th Cir. 2024), *cert. denied,* 145 S. Ct. 1128 (2025). The dis-

trict court's determination of equitable tolling is also reviewed de novo. *Id.* at 366.

The district court determined, and Mahvi does not dispute, that his claims are governed by Ohio's two-year personal-injury statute of limitations. *See Jones v. R.R. Donnelley & Sons Co.,* 541 U.S. 369, 371, 382 (2004); *Beaver St. Invs., LLC v. Summit County,* 65 F.4th 822, 826 (6th Cir. 2023); *see also* Ohio Rev. Code Ann. § 2305.10(A). The statute of limitations starts to run when the "plaintiff has a complete and present cause of action," which is "when the plaintiff knows or has reason to know of the injury which is the basis of his action." *Beaver St. Invs.,* 65 F.4th at 826 (citation modified). The events giving rise to Mahvi's suit occurred in 2016 and 2017, so the statute of limitations expired, at the latest, in 2019. He did not initiate this suit until 2024, at least five years later. His claims are therefore time-barred, as he appears to concede.

Mahvi argues, however, that he is entitled to equitable tolling. When a state's statute of limitations governs a federal claim, the state's equitable tolling provisions govern "unless they are inconsistent with federal law." *Bozzo v. Nanasy,* 159 F.4th 1111, 1118 (6th Cir. 2025), *cert. denied,* 2026 WL 1463208 (U.S. May 26, 2026); *see Wershe,* 112 F.4th at 370-71. In Ohio, as under federal law, equitable tolling is available when a litigant "demonstrate [s] that he diligently pursued his rights, but some extraordinary circumstance stood in his way and prevented timely action." *Coleman v. Columbus State Cmty. Coll.,* 49 N.E.3d 832, 838 (Ohio Ct. App. 2015); *see Cal. Pub. Emps.' Ret. Sys. v. ANZ Sec., Inc.,* 582 U.S. 497, 507 (2017). Under both federal law and Ohio law, the doctrine is

used "sparingly." *Bozzo,* 159 F.4th at 1118; *see Benkovits v. Bandi,* 173 N.E.3d 864, 873 (Ohio Ct. App. 2021).

In the district court, Mahvi argued that equitable tolling should apply because he lacked notice of the limitations period for his claims, he acted diligently when he became aware of the limitations period, the defendants would not be prejudiced by his untimely suit because they were aware of their wrongful conduct by October 15, 2016, and he lacked legal knowledge or training. He reiterates those arguments here. He also alleges that procedural delays, the State's concealment of evidence, and the ineffective assistance of his counsel in his criminal case support equitable tolling in this case. He further alleges that an attorney he hired to investigate his criminal case prepared reports between 2021 and 2024 that support his innocence and demonstrate his diligence.

Mahvi's "[i]gnorance of the legal process alone" does not provide a basis for equitable tolling. *Zappone v. United States,* 870 F.3d 551, 559 (6th Cir. 2017) (quoting *Jones v. Gen. Motors Corp.,* 939 F.2d 380, 385 (6th Cir. 1991)). Mahvi's arguments based on alleged errors in his criminal case do not support equitable tolling either. Mahvi does not explain how alleged errors in his criminal case and his engagement of counsel to investigate such errors prevented him from timely filing this civil suit. Mahvi's criminal case was resolved with a conviction in 2017, so he knew or should have known by then of the alleged errors in that proceeding, yet he did not engage counsel to investigate his criminal case until four years later and did not promptly file this suit. In short, none of Mahvi's arguments show that an "extraordinary circumstance," such as fraud, prevented him from

timely filing his civil action, or that he acted with the requisite diligence. *Coleman,* 49 N.E.3d at 838.

Because the timeliness issue is dispositive of the appeal, we decline to address Mahvi's remaining arguments, which relate to the merits of his claims and were not addressed by the district court.

We therefore AFFIRM the district court's judgment.

ENTERED BY ORDER OF THE COURT

/s/ Kelly L. Stephens
Clerk

JUDGMENT, U.S. COURT OF APPEALS FOR THE SIXTH CIRCUIT (AUGUST 21, 2026)

FILED
Aug 21, 2026
Kelly L. Stephens, Clerk

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

ALI PASCAL MAHVI,

Plaintiff-Appellant,

v.

GEAUGA COUNTY, OH JOBS AND FAMILY SERVICES, ET AL.,

Defendants-Appellees.

No. 25-3469

On Appeal from the United States District Court for the Northern District of Ohio at Cleveland.

Before: NORRIS, STRANCH, and MATHIS, Circuit Judges.

JUDGMENT

THIS CAUSE was heard on the record from the district court and was submitted on the briefs without oral argument.

IN CONSIDERATION THEREOF, it is ORDERED that the judgment of the district court is AFFIRMED.

ENTERED BY ORDER OF THE COURT

/s/ Kelly L. Stephens
Clerk

MEMORANDUM OPINION AND ORDER, U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO, EASTERN DIVISION (MAY 29, 2025)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ALI PASCAL MAHVI,

Plaintiff,

v.

GEAUGA COUNTY,
OHIO JOBS AND FAMILY SERVICES, ET AL.,

Defendants.

Case No. 1:24-CV-1098

Before: Bridget MEEHAN BRENNAN, Judge.

MEMORANDUM OPINION AND ORDER

Before the Court are Defendants Geauga County Ohio Jobs and Family Services' ("OJFS"), Karen Sweet's ("Sweet"), Tenga, Inc.'s (d/b/a WKYC TV) ("WKYC"), and Tom Meyer's ("Meyer") (collectively "Defendants") motions to dismiss. (Docs. 21, 25.) Plaintiff Ali Pascal Mahvi ("Mahvi") opposed the motions (Docs. 26, 27), and Defendants replied (Docs. 28, 29). For the reasons set forth below, Defendants'

motions to dismiss are GRANTED because Mahvi's claims are barred by the applicable statute of limitations.

I. Background

A. Factual Background

From 2013 through 2016, Mahvi lived in Geauga County and participated in the Supplemental Nutrition Assistance Program ("SNAP") and related benefits programs. (Doc. 19 at 111.)[1] In August 2016, Sweet, a fraud investigator with OJFS, began investigating Mahvi's receipt of these benefits. (*Id.* at 116.) During her investigation, Sweet obtained a search warrant for Mahvi's home. (*Id.* at 117.) On September 2, 2016, the search warrant was executed. (*Id.*)

In December 2016, Mahvi was indicted and charged with various fraud offenses relating to his receipt of SNAP and other benefits. (*Id.* at 145.) In September 2017, he was convicted after a bench trial. (*Id.* at 147.) Mahvi maintains his innocence and alleges OJFS and Sweet engaged in fraud, misconduct, and other illegal actions throughout the investigation. (*Id.*)

Mahvi also alleges Meyer, an investigative reporter for WKYC news, conspired with Sweet and arranged for a cameraman to be present during the search of Mahvi's home. (*Id.* at 118.) Meyer broadcasted stories in 2016 and 2017 relating to the investigation, indictment, trial, and conviction. (*Id.* at 119.) In these stories, Meyer allegedly reported that Mahvi

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[1] For ease and consistency, record citations are to the electronically stamped CM/ECF document and PageID# rather than any internal pagination.

was Iranian, Muslim, and the son of Iranian royalty. (*Id.*) Plaintiff alleges Meyer did so with racial animus, all while he knew Mahvi was an American citizen. (*Id.*) Allegedly, Meyer conspired with Sweet and others to harm Mahvi's reputation and business relationships. (*Id.*)

B. Procedural History

Plaintiff filed his complaint on July 1, 2024. (Doc. 2.) He asserted claims arising under 42 U.S.C. §§ 1981, 1983, and 1985, and requested a new state trial to prove his innocence. (*Id.* at 19.) The named defendants are OJFS, Sweet, WKYC, and Meyer. (*Id.* at 13.) On August 5, 2024, Defendants OJFS and Sweet answered and moved to dismiss. (Docs. 14, 15.) Defendants WKYC and Meyer moved to dismiss on August 22, 2024. (Doc. 18.)

On August 26, 2024, Plaintiff filed a first amended complaint. (Doc. 19.) The first amended complaint alleges violations of 42 U.S.C. § 1983 (Count One, against all Defendants); 42 U.S.C. § 1981 (Count Two, against all Defendants); and 42 U.S.C. § 1985 (Count Three, against all Defendants). The first amended complaint added Geauga County Commissioners, including James Dvorak, a member of the Geauga County Board of Commissions as defendants.[2] On

[2] The first amended complaint does not contain any allegations relating to a "James Dvorak." Further, nothing on the docket reflects "James Dvorak" was served in this case. And while the first amended complaint adds "Geauga County Commissioners" as a defendant, there is nothing on the docket suggesting service. Notwithstanding these issues, because the first amended complaint must be dismissed on statute of limitations grounds, no claims can also remain as to the "Geauga County Commissioners" or "James Dvorak" defendants.

September 12, 2024, Defendants WKYC and Meyer moved to dismiss the first amended complaint. (Doc. 21.) Defendants OJFS and Sweet moved to dismiss the first amended complaint on September 25, 2024. (Doc. 25.) Plaintiff opposed both motions (Docs. 26, 27) and Defendants filed replies (Docs. 28, 29).

II. Legal Standard

Under Rule 12(b)(6), a court must dismiss a complaint if it fails "to state a claim upon which relief can be granted." Fed. R. Civ. P. 12(b)(6). To state a claim, a complaint must contain "a short and plain statement of the claim showing that the pleader is entitled to relief." Fed. R. Civ. P. 8(a)(2). To survive a Rule 12(b)(6) motion, the complaint must make out a plausible legal claim, meaning the complaint's factual allegations must be sufficient for a court "to draw the reasonable inference that the defendant is liable." *Ashcroft v. Iqbal*, 556 U.S. 662, 678, 129 S.Ct. 1937, 173 L.Ed.2d 868 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570, 127 S.Ct. 1955, 167 L.Ed.2d 929 (2007)). Plausibility does not require any specific probability of success, but it does demand "more than a sheer possibility that a defendant has acted unlawfully." *Id.*

When evaluating a motion to dismiss, courts must presume all factual allegations to be true and all inferences must be drawn in plaintiff's favor. *Cates v. Crystal Clear Techs., LLC*, 874 F.3d 530, 534 (6th Cir. 2017) (quoting *Bickerstaff v. Lucarelli*, 830 F.3d 388, 396 (6th Cir. 2016)). But the court "need not accept as true legal conclusions or unwarranted factual inferences, and conclusory allegations or legal conclusions masquerading as factual allegations will

not suffice." *D'Ambrosio v. Marino*, 747 F.3d 378, 383 (6th Cir. 2014) (quoting *Terry v. Tyson Farms, Inc.*, 604 F.3d 272, 275-76 (6th Cir. 2010)). A pleading that offers "labels and conclusions, and a formulaic recitation of the elements of a cause of action will not do." *Id.* (quoting *Republic Bank & Trust Co. v. Bear Stearns & Co., Inc.*, 683 F.3d 239, 246-47 (6th Cir. 2012)). Nor does a complaint suffice if it "tenders naked assertions devoid of further factual enhancement." *Iqbal*, 556 U.S. at 678 (quotations and citations omitted).

Notable here, a plaintiff's own allegations may establish "an insurmountable bar to relief" such that a motion to dismiss must be granted. *Southfield Educ. Ass'n v. Southfield Bd. of Educ.*, 570 F. App'x 485, 487 (6th Cir. 2014) (citing *Twombly*, 550 U.S. at 561-64). "[D]ismissal of a plaintiff's claim is appropriate when 'the allegations in the complaint affirmatively show that the claim is time-barred.'" *Wershe v. City of Detroit*, 112 F.4th 357, 364 (6th Cir. 2024) (quoting *Baltrusaitis v. Int'l Union, United Auto., Aerospace & Agric. Implement Workers*, 86 F.4th 1168, 1178 (6th Cir. 2023)). Simply stated, "plaintiffs can plead themselves out of court on statute-of-limitations grounds if the complaint alleges facts showing that they did not sue in time." *Reguli v. Russ*, 109 F.4th 874, 879 (6th Cir. 2024).

III. Analysis

All Defendants moved for dismissal on the grounds that each of Mahvi's claims are barred by

the applicable statute of limitations.[3] (Doc. 21-1 at 160; Doc. 25 at 197.)

The statutory text of §§ 1981, 1983, and 1985 does not set forth a limitations period. *Moore v. Potter*, 47 F. App'x 318, 320 (6th Cir. 2002). Instead, each borrows "the most appropriate or analogous state statute of limitations." *Stevenson v. Rayloc*, 114 F. App'x 167, 169 (6th Cir. 2004) (citing *Goodman v. Lukens Steels Co.*, 482 U.S. 656, 660-61, 107 S.Ct. 2617, 96 L.Ed.2d 572 (1987)). "[F]or all §§ 1981, 1983, and 1985 actions, federal courts apply the state personal injury statute of limitations." *Moore*, 47 F. App'x at 320. In Ohio, the statute of limitations for personal-injury torts is two years. R.C. § 2305.10(A). Thus, each of Plaintiff's claims are subject to a two-year statute of limitations.[4] *See Cornelius v. Kroger Co.*,

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[3] Defendants also assert various other arguments, including party-specific arguments. The Court does not reach these arguments because the statute of limitations bars all of Plaintiff's claims.

[4] WKYC and Meyer state that statute of limitations for § 1981 claims is four years pursuant to 28 U.S.C. § 1658. (Doc. 21-1 at 170.) But § 1658 only applies to conduct made illegal by the Civil Rights Act of 1991, which added provisions to § 1981. *See Jones v. R.R. Donnelley & Sons Co.*, 541 U.S. 369, 124 S.Ct. 1836, 158 L.Ed.2d 645 (2007). Thus, a claim is subject to the state's analogous statute of limitations if the conduct was previously prohibited by § 1981 before the enactment of the Civil Rights Act of 1991, and a claim is subject to a four-year statute of limitations if the conduct was made prohibited by the Civil Rights Act of 1991. *Id.* The Civil Rights Act of 1991 only amended § 1981 relating to "alleged discriminatory actions occurring after the formation of the employment relationship." *Anthony v. BTR Auto. Sealing Sys., Inc.*, 339 F.3d 506, 514 (6th Cir. 2003). Because the conduct here was not made prohibited by the Civil Rights Act of 1991, the state analogous statute of

No. 13-cv-708, 2014 WL 6685172, 2014 U.S. Dist. LEXIS 165118, at *11 (S.D. Ohio Nov. 25, 2014) (collecting cases applying Ohio's statute of limitations for personal-injury torts to § 1981 claims); *Beaver St. Invests., LLC v. Summit Cnty.*, 65 F.4th 822, 826 (6th Cir. 2023) (holding "[t]he statute of limitations for § 1983 claims is the relevant state's statute of limitations for personal-injury torts," and so, "a two-year statute of limitations applies to § 1983 claims" brought in Ohio); *Dotson v. Lane*, 360 F. App'x 617, 619 n.2 (6th Cir. 2010) ("[a] two-year statute of limitations applies to section 1985 cases brought in the state of Ohio.").

Unlike the time period for the statute of limitations which is governed by the analogous state law, when a claim begins to accrue is governed by federal law. *Beaver St. Invests.*, 65 F.4th at 826 (citing *Wallace v. Kato*, 549 U.S. 384, 388, 127 S.Ct. 1091, 166 L.Ed.2d 973 (2007)). Generally, a plaintiff's claim accrues "when the plaintiff knows or has reason to know of the injury which is the basis of his action." *Id.* (quoting *Kuhnle Bros., Inc. v. Cnty. of Geauga*, 103 F.3d 516, 520 (6th Cir. 1997)). Stated somewhat differently, courts "look[] to what event should have alerted the typical lay person to protect his or her rights." *Id.* (quotation and citations omitted).

Mahvi's complaint alleges OJFS' and Sweet's injurious conduct began with their investigation, namely the execution of the search warrant on September 2, 2016, and continued until his conviction in September 2017. As for WKYC and Meyer, their first alleged

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limitations applies, not § 1658. In any event, under either time period, Plaintiff's claims fail.

misconduct occurred in September 2016 and continued until December 2016. Based on Mahvi's own allegations, he "knew or had reason to know" they caused his alleged injuries as early as September 2016 and as late as September 2017.

Mahvi had two years to file his claims. Meaning, Mahvi had to file his claims against OJFS and Sweet by September 2019, and his claims against WKYC and Meyer by December 2018. He did not file this lawsuit until 2024. To avoid a determination his claims are time-barred, Mahvi argues §§ 1981, 1983, and 1985 contain no explicit statute of limitations in their text, so no statute of limitations applies. (Doc. 26 at 216.) But long-established Supreme Court and Sixth Circuit precedent forecloses this argument. *See Goodman*, 482 U.S. at 660-61; *3799 Mill Run Partners, LLC v. City of Hilliard*, 839 F. App'x 948, 950 (6th Cir. 2020) (explaining federal courts use state statute of limitations for § 1983 claims). While Mahvi acknowledges this precedent, he argues it "is unclear that this judicially created two-year statute of limitations" should apply. (Doc. 26 at 216.) Based on established precedent, however, it is clear a two-year statute of limitations applies.

Notwithstanding the statute of limitations, Mahvi asks the Court to toll the accrual of his claims. "Equitable tolling 'allows courts to toll a statute of limitations when a litigant's failure to meet a legally-mandated deadline unavoidably arose from circumstances beyond that litigant's control.'" *Plummer v. Warren*, 463 F. App'x 501, 504 (6th Cir. 2012) (quoting *Robertson v. Simpson*, 624 F.3d 781, 783 (6th Cir. 2010)). "[A] litigant's failure to meet a legally-mandated deadline due to unavoidable circumstances beyond

that litigants control is often the most significant consideration in courts' analyses." *Zappone v. United States*, 870 F.3d 551, 556 (6th Cir. 2017) (cleaned up). "The party seeking equitable tolling bears the burden of proving he is entitled to it." *Id.* The Sixth Circuit has identified five considerations when determining whether equitable tolling should apply: "1) lack of notice of the filing requirement; 2) lack of constructive knowledge of the filing requirement; 3) diligence in pursuing one's rights; 4) absence of prejudice to the defendant; and 5) the plaintiff's reasonableness is remaining ignorant of the particular legal requirement. *Truitt v. Cnty. of Wayne*, 148 F.3d 644, 648 (6th Cir. 1998) (citing *Andrews v. Orr*, 851 F.2d 146, 151 (6th Cir. 1988)). "[T]he doctrine of equitable tolling is used sparingly by federal courts." *Robertson*, 624 F.3d at 784.

Mahvi asserts equitable tolling saves his claims.[5] (Doc. 19 at 130-31; Doc. 26 at 216.) In doing so, he

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[5] It is an open question in this Circuit whether federal or state law equitable tolling applies to § 1983 claims (and by extension § 1981 and § 1985). *See Wershe*, 112 F.4th at 370-71 (discussing whether federal or state equitable tolling applies, ultimately not answering the question because the arguments failed under either standard). Typically, when a court borrows a state's statute of limitations, the court also borrows the state's tolling rules. *Bishop v. Children's Ctr. for Dev. Enrichment*, 618 F.3d 533, 537 (6th Cir. 2010) ("[w]hen the statute of limitations is borrowed from state law, so too are the state's tolling provisions"). Here, the parties assume federal equitable tolling applies and do not address equitable tolling under Ohio law. Therefore, the Court will only address federal equitable tolling. Nonetheless, the Court notes Ohio's equitable tolling principle is substantially similar to the federal standard. *Antioch Co. Litig. Tr. v. Morgan*, 644 F. App'x 579, 583 (6th Cir. 2016) ("Under Ohio law, equitable tolling is to be applied sparingly where a litigant has 'diligently

directs the Court to allegations included in his first amended complaint, namely: he did not have actual or constructive knowledge of the time limitations for filing his claims; he diligently pursued these claims after learning about the time limitations; it is reasonable he remained ignorant of his rights and time limitations because his lack of legal knowledge; and that defendants will suffer no prejudice from the tolling of the claims. (Doc. 19 at 130-31.)

Mahvi's equitable tolling argument claims ignorance of the law prevented him from filing on time. This is the only "circumstance" Mahvi advances. Ignorance of the law is insufficient to invoke equitable tolling. *Rose v. Dole*, 945 F.2d 1331, 1335 (6th Cir. 1991) ("It is well-settled ignorance of the law is not sufficient to warrant equitable tolling.") (collecting cases). Mahvi does not provide any circumstances which "unavoidably arose" that was "beyond" his control which prevented him from pursuing his claims. *Zappone*, 870 F.3d at 556.

Even if the Court could accept Mahvi's ignorance of the law argument, Mahvi did not diligently pursue his rights. To show diligence, Mahvi must show he "pursued the instant claims during the entire period over which he seeks equitable tolling." *Wershe*, 112 F.4th at 367-68. That is, Mahvi "must have pursued his claims with 'some regularity' during that period, 'as permitted by his circumstances.'" *Id.* at 368 (quoting *Smith v. Davis*, 953 F.3d 582, 601 (9th Cir. 2020) (en

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pursued his rights, but some extraordinary circumstance stood in his way and prevented timely action.'") (quoting *Coleman v. Columbus State Comm. Coll.*, 49 N.E.3d 832, 838 (Ohio Ct. App. 2015)).

banc)). Consulting legal professionals can sometimes establish diligence. *Id.*

Mahvi has neither pleaded nor argued in opposition that he did anything to pursue his claims in 2019 or at any time between 2019 until 2023 when he consulted legal counsel about a civil action. (Doc. 26 at 217.) Allowing four years to pass with no action to pursue one's civil claims is not reasonable diligence. *Wershe*, 112 F.4th at 368 (merely consulting two attorneys over a period of time did not establish reasonable diligence).

Mahvi also acknowledges engagement in a flurry of activity relating to his criminal conviction from 2017 to present. For instance, he "filed complaints against the Defendants" and "wrote no less that [sic] 100 letters to the State agencies." (Doc. 26 at 218.) These allegations do not help Mahvi's argument for equitable tolling. In fact, these allegations confirm Mahvi knew or reasonably should have known of his alleged injuries in 2016 and 2017.

Mahvi, relying on *Robertson*, appears to argue the ineffective assistance of criminal defense counsel was the reason he delayed in pursuing these civil claims. (Doc. 19 at 131.) In *Robertson*, the Sixth Circuit remanded the case to the district court for further consideration and noted that an attorney's incompetence may be sufficient for equitable tolling. *Robertson*, 624 F.3d at 783. But, again, the timeline does not aid Mahvi's argument.

Mahvi directs the Court to disciplinary proceedings in 2019. *See Disciplinary Counsel v. Delay*, 132 N.E.3d 680 (Ohio 2019). Even if the Court credited Mahvi's argument his criminal defense counsel's fail-

ures delayed pursuing these civil claims, the disciplinary proceedings were publicly known in 2019. Years have passed since 2019 with no action taken to pursue these civil claims. Mahvi has provided no information that would warrant equitable tolling after 2019. Simply stated, Mahvi has not met his burden of demonstrating equitable tolling saves his claims from the applicable two-year statute of limitations.

IV. Conclusion

For the reasons stated above, Defendants' motions to dismiss are GRANTED because Plaintiff Ali Pascal Mahvi's claims are barred by the applicable statute of limitations. All claims are DISMISSED with prejudice.

IT IS SO ORDERED.

/s/ Bridget Meehan Brennan
U.S. District Judge

Date: May 29, 2025

LETTER OF ATTESTATION
OF GEORGE VORYS
(APRIL 7, 2023)

GEORGE N. VORYS, MBA, JD
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The undersigned Attorney is registered with the Office of Attorney Services at the Ohio Supreme Court. My Practice is focused on global projects involving Real Estate Development; Affordable Housing; Commodities Sales; LTN/MTN Sales; Health & Information Management; and Asset Recovery requiring General Counsel Services, and Fraud/ Waste, and Abuse Loss Mitigation to ensure the Integrity of Multi-Programs-Medicaid and SNAP, and Medicaid and SNAP Fraud Convictions for the disclosure of incorrect information on public assistance applications.

In the case of Ali Pascal Mahvi ("Mr. Mahvi"), a natural citizen of the United States who was erroneously and wrongfully convicted on September 15, 2017 after he met his disclosure obligation to the County Agency, I completed a reasonable investigation of the Factual Innocence of this Medicaid and SNAP Recipient to help guide the public interests of Geauga County who have a stake in the fairness and transparency of the Eligibility Determination system that has become vulnerable to infection from Misinformation and Disinformation from Media Coverage. This was caused by the breakdown in effective compliance systems that requires good faith, disinterested reporting.

This Letter of Attestation shows Ali Pascal Mahvi was intentionally and wrongfully convicted of crimes he did not commit, and is intended to:

(i) Assist State Officials in making informed decisions about the accuracy of its Medicaid / SNAP Eligibility Determination System in the State in approving and renewing food and medical assistance, and in making decisions to share and release personal data of recipients with the Media without the recipient's permission, including the requirements for the security and privacy of health information under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA").

(ii) Assist State Officials in making the informed decisions as to whether and to what extent, an integrated Multi-Program Compliance Program (Medicaid and SNAP) was effective with proper Integrity program sharing of personal data with specific compliance obligations such as the sharing of Social Security, income eligibility, medical or food assistance information, between the County Agencies, the County Prosecutor's Office, the media.

(iii) Assist State Officials in respecting the rights of recipients in Multi-Programs entitled to fair and transparent treatment to prevent inconsistent program outcomes, making premature fraud referrals to County Prosecutors without a Notice of Adverse Action ("NOAA") to the SNAP recipients.

(iv) Assist State Officials with Medicaid Integrity program policies and procedures to call for an

attorney from the legal departments of ODJFS and ODM to be present with the County Lead Fraud Investigator at all municipal or common pleas court hearings, to ensure there is competent and reliable forensic Medicaid and SNAP Audit evidence being presented to Judges reviewing Search Warrant Affidavits, to respect the rights of Medicaid and SNAP recipients to be secure in their persons, houses, papers and effects, and to ensure that the JFS County Agencies uses less intrusive means as an alternative to a gunpoint search and seizure with one of the verification procedures OAC 5101:4-2-09 (such as Home Visits to obtain loan and income documents), to address questionable information without excessive force.

(v) Assist State Officials to understand payment Integrity and compare the administrative and investigations costs of the County Prosecutor Office and the fraud unit of the County Agency Office to address potential SNAP overpayments incurred by the "Victim of the Crime" who is the Ohio Department of Jobs and Family Services (ODJFS) where the March 2021 Redbook LBO Analysis of the Legislative Services Commission estimated ODJFS's *FY 2022-2023 Victim's Budget of $8.6 Billion* with 72% of the budget funded by the Federal Government.

WORK COMPLETED:

Phase 1-Post Medicaid/SNAP Fraud Conviction Investigation:

During September of 2020 Mr. Mahvi asked me to investigate the Factors that were present that influenced the likelihood of an erroneous Medicaid/ SNAP fraud conviction on September 15, 2017. The estimated 2,000 hours of pro bono work completed to April 2023 identified the specific Factors, including the infection in the Medicaid and SNAP Eligibility System of Misinformation and Disinformation, created by a greater than 38 Media Global Events, emanating from the WKYC-TV Media Coverage (because of the personal relationship of the County Prosecutor with the WKYC-TV Investigative Reporter, Tom Myers) and the ensuing Google, nonstop Coverage during the period starting September 1, 2016 to present day, that continues to show the Misinformation and Disinformation that the Conviction of Mr. Mahvi was correct.

These Findings and Conclusions are presented to initiate a robust quality improvement process for County criminal justice stakeholders, to continually learn from their errors with Lesson Learned Reports, investigate roots causes, and to promote candid discussions about just cultures to not only remedy, but to prevent erroneous convictions in the future in all Ohio Counties, and for Geauga County to immediately correct the Misinformation and Disinformation at the County Agency Medicaid & SNAP Case File #5110901401.

To prepare a clear report for the State Officials, I was required to review four (4") Binders of the case file and related materials covering the 38 Media Events,

the List of Lost qualified Strategic Investors caused by the Misinformation/Disinformation, Court Transcripts, Filings, Motions, a Private Investigator's Sworn Statement, the Sworn Statement of Karen Sweet, the former Chief Investigator then attached to the Geauga County Prosecutor's Office, the Medicaid and SNAP Applications of the County Agency, Jobs and Family Services ("JFS"), review the Letter a State's Witness, Ralph Criswell, the State Hearing Decisions of ODJFS dated May 1, 2017 (where the Hearing Officer reinstated Mr. Mahvi's Medicaid benefits contradicting the decision of JFS rendered in 2016 (that wrongfully terminated SNAP benefits for the Mahvi Family), each of the 12 Lender documents who had loaned money to Mr. Mahvi while he worked to complete a business stabilization and turnaround plan so as to monetize Exquisite Caribbean Resorts' ("ECR") valuable real estate in St Lucia (with an appraised value of $155 million), and a book written by Mr. Mahvi titled "Deadly Secrets of Iranian Princes-Audacity to Act" displaying the Family Tree Chart of the Qajar Dynasty of Persia (1794-1925) that explains his Heritage, presenting the irony that One of the lost $180 Million Investors from the Misinformation was from the Qatar Royal Family, the day after his Arraignment on January 14, 2017. Unfortunately, the County Prosecutor did not pursue a reasonable investigation or understand the risks of not supervising his Lead Fraud Investigator and the adverse impact of her misconduct that resulted in the loss of investments funds to ECR, and the County Prosecutor did not take diligent steps to correct the information.

The documentary evidence was voluminous and included information on Mr. Mahvi's marriage to a Natural U.S. Citizen in 1984, his residence as U.S. resident during his whole adult life, his U.S. Passport, a New York State Birth Certificate, and an Ohio Driver's License. Of late I learned of his U.S. Draft Card number A-1 No. 56 for the Vietnam War. I would attest that Mr. Mahvi is as much a U.S. Citizen as the undersigned and well-integrated into U.S. Society until his Citizenship was very publicly challenged on WKYC-TV by the Geauga County Prosecutorial Office on his curbside as they raided his home at gunpoint on September 2, 2016.

This deliberate review process allowed me to share my findings and conclusions with the Ohio Governor's Office, the Ohio Attorney General and Directors of four State Agencies. As verification of facts were completed, the following Post-Conviction Reports were prepared and submitted to State of Ohio Officials:

- August 23, 2021-14-Page Letter to the Offices of the Governor and Attorney General titled "Request for Exoneration for Errors of County Jobs and Family Services, Errors of County Criminal Investigator, Errors of County Prosecutor".
- August 23, 2021-13-Page Exhibit A titled "Report of Independent Findings".
- December 22, 2021-23-Page Memo to the Offices of the Governor and Attorney General.
- April 5, 2022-131-Page Post Conviction Report to State of Ohio Officials.

- June 4, 2022-41-Page Post Conviction Summary for State of Ohio Officials.
- June 4, 2022-4-Page Letter to the Governor's Office titled "Communication and Resolution proposal to Organize a Geauga County Conviction Integrity Unit to Reduce Adverse Legal Errors".
- August 15, 2022-Letter to the Governor's Office and Directors of 4 State of Ohio Agencies titled "Assistance Group Name-Ali P. Mahvi, Case # 5110901401: Communications and Resolution".

Phase 2-Due Diligence Investigation:

As a result of the intentional Misinformation / Disinformation that emanated from the Prosecutorial Office's intentional Media Coverage using WKYC-TV of an erroneous Indictment and Arraignment, that spread to Europe, the Middle East, and the Far East (where Mr. Mahvi enjoyed valuable business relationships,) ECR lost three $180 Million-dollar Strategic Investors, one in 12/2016 and the other two on 01/14/2017. Following his Erroneous Conviction in September of 2017, ECR lost at least four more Strategic Investors from the concern of Mr. Mahvi's criminal history. The resulting unreasonable transaction delay is directly attributed to the September 2, 2016 media coverage of the gunpoint raid and the erroneous media coverage of the wrongful Indictment on December 7, 2016.

As Majority Owner of ECR with 65% ownership interest, Mr. Mahvi proposed that in verifying and validating the amounts for distribution from anticipated

Sale Proceeds, that the due diligence data gathered, analyzed, and used to complete this transaction must comply with the procedures outlined in OAC 5101:4-2-09 Verification Procedures, which the State of Ohio Officials routinely use for their public assistance applications.

Outputs of the Reports:

Outputs of the Reports were to identify Factors that influenced the likelihood of an Erroneous Conviction and failure of the Geauga County Criminal Justice System. These are identified as follows:

1. Location of Case:

The case was investigated and tried to a *punitive county* where the legal culture was one interested in obtaining a conviction at any costs. This was likely assisted by the election year of 2016, where the prosecutor wanted high visibility.

2. County Prosecutor's Office:

a) Lead Fraud Investigator Misconduct with a discrimination motive-Karen Sweet:

- Karen Sweet is labeled by three independent Criminal lawyers in Cleveland as an Investigator who likes to "manipulate facts in order to get her target". This behavior is clearly consistent by her misleading August 12, 2016 FinCEN Report filed with Ohio Attorney General Office, Bureau of Criminal Investigation, Criminal Intelligence Unit, U.S. Dept of Treasury-Financial Crimes Enforcement Network (FinCEN), and her *intentionally False* September 1, 2016 Sworn Statement

to secure a Search Warrant. She used the tensions between the governments of US and Iran, to bring focus of Mr. Mahvi as an "Iranian". In addition, in Section 18 of her Search Warrant Affidavit issued to Municipal Judge Terri Stupica she made a false disclosure that Mr. Mahvi had a financial interest in a Swiss Bank Account at *Pictet CIE Banquiers* in Geneva, Switzerland, in the amount of $4,038,000 (which was widely broadcast on TV) and included false statement that millions of dollars went through his U.S. Bank Accounts. This induced Judge Stupica to issue the Search Warrant.

- She Perjured her FinCEN Report with a discrimination motive to create the intentional perception that "Ali" Pascal Mahvi is an "Iranian". In contrast, she listed Mr. Mahvi's wife's ethnicity/race as "White".
- She Perjured her Sworn Statement for the Search Warrant, impersonating that she was a Medicaid and SNAP Auditor with the skill sets and knowhow to obtain competent and accurate forensic data on monthly income by reconciling multiple bank statements and loan proceeds that gave confidence to Judge Stupica to sign the Search Warrant. In fact, she only had two semesters of accounting and no forensic accounting experience, especially as it pertains to Medicaid and SNAP Programs.
- She exaggerated her skill sets and technical knowhow claiming she could develop a

detailed audit program that was trustworthy, adequately planned, and properly supervised to track and trace deposits with a high volume of intra-account transactions between the 13 Mahvi's Household, ECR and Idria Energy (both international businesses) bank accounts and explain the composition of the balances as either income or "Loan Proceeds" to explain the cash flow of the Mahvi Household, ECR and Idria. Federal and State Statutes state that loan proceeds are excluded from the definition of Income: IRC 26 U.S.C Section 61, OAC 5160: 1-2-01, ODJFS 5101:4-4-13 FATL 339 Effective September 1,2013 and the ODJFS May 20, 2009 Policy Questions and Answers based on OAC Rule 5101:4-4-19 (E) and 7 CFR 273.8 (e) (1).

- She did not comply with OAC 5101:4-2-09 SNAP Verification Procedures by failing to conduct a third-party verification program for Mr. Mahvi's 12 personal lenders when Mr. Mahvi cooperated without legal representation and delivered to her and JFS, between September 6, 2016 to October 15, 2016, the documentary evidence of all the underlying Promissory Notes and over 111 loan confirmation emails to meet his disclosure obligation of providing loan documentation to the County Agency.
- She failed to conduct a professional Lender Verification Program or interview Mr. Mahvi's 12 Lenders to ascertain the Loan documents stated the truth.

b) County Prosecutor's Errors: James Flaiz:

- His Lack of Supervision of his Lead, Fraud Investigator resulted in her assuming the role of a Medicaid/SNAP Auditor during pretrial, and at trial to act as a competent Auditor of accounts resulting in her fabrication of Medicaid and SNAP forensic audit evidence. The County Prosecutor, James Flaiz did not take reasonable steps to correct the forensic evidence errors as contemplated by Ohio Professional Conduct Rule 5.3: Responsibilities Regarding Nonlawyer assistants.
- Contrary to Ohio Professional Conduct Rule 3.6 and 3.8, the Prosecutor conducted no less than four Media Blitzes in cooperation with his house neighbor, the WKYC-TV Investigative Reporter, Tom Myers to force Mr. Mahvi to accept a guilty plea. Media Coverage Activity is a function outside his prosecutorial duties. One Media Blitz was orchestrated prior to Indictment and occurred on Mr. Mahvi's curbside during the September 2, 2016 Gunpoint raid, the second was at Indictment on December 7, 2016, the third was during the Arraignment of January 13, 2017, and the last was at Trial. All Media Blitzes occurred while, the Medicaid and SNAP Eligibility Determination Process was being conducted by the JFS County Agency. The County Prosecutor conducted his Media Coverage without checking or verifying with the County Agency Medicaid/ SNAP Case File to confirm that Mr. Mahvi had a US Passport, a New York State Birth Certificate,

a Social Security Card, and an Ohio Driver's License. This Media Coverage resulted in his very public prejudicial statements on WKYC-TV would have a substantial likelihood of materially prejudicing the criminal proceeding in the matter.

- When the Prosecutor knew of new, credible, and material evidence that the SNAP Program terminated food assistance for the Mahvi Family in February 2016 but that the Medicaid Program had *reinstated* their Medicaid Benefits on May 1, 2017 (which created a reasonable likelihood that Mr. Mahvi, did not commit an offense of which he was convicted), did not promptly disclose this evidence to the Defendant's Counsel and to the Court, and after the Medicaid and SNAP Eligibility Fraud conviction, he failed to undertake the obligatory further investigation to determine whether the Defendant was convicted of an offense that he had not committed, and failed to seek to remedy the conviction. *See* Ohio Professional Conduct Rule 3.8. Instead, when Mr. Mahvi attempted to reopen the case through the Geauga County Judiciary in December 2021, the Prosecutor opposed such post-conviction review to have him exonerated.
- The Prosecutor failed to disclose Medicaid and SNAP Program Data during pretrial proceedings that was favorable to Mr. Mahvi's Case such as the inconsistent program outcomes in SNAP terminating food assistance in February of 2016, and the Medicaid reinstated

Medicaid Benefits in May of 2017. Instead, he withheld 100% of the exonerating evidence at trial in order to assure a conviction.

c) County Agency-Jobs and Family Services: Greg Swenson:

- Director of JFS County Agency, Greg Swenson, the former Assistant Prosecutor to Mr. Flaiz, failed to supervise his staff to conduct third-party verification with a professional Lender Verification Program to confirm accurate loan amounts of Mr. Mahvi's 12 personal loans to ensure a timely and accurate Medicaid and SNAP Eligibility Determination. He also failed to correct the record with the County Prosecutor that Mr. Mahvi is a Natural U.S. Citizen.
- Director's Lack of knowledge of ODJFS's loan disclosure and reporting requirements and procedures created confusion on part of Mr. Mahvi to develop an action plan for loan documentation requirements (Loan Letter, Promissory Notes, etc.). To aggravate the situation, the JFS User Manual issued to Mr. Mahvi in 2014 is devoid of how to handle loans and its reporting requirements, if any, providing no information for an action plan.
- The Director failed to supervise his staff to be responsible for the maintenance and safeguarding of all loan documentation for Mr. Mahvi's 12 Lenders to ensure accurate loan data is available in court to ensure competent and reliable forensic audit evidence

for a timely and accurate Medicaid and SNAP Eligibility Determination.

- The Director failed to appoint a qualified Medicaid and SNAP Auditor to be responsible for maintenance of competent and reliable forensic data to resolve the discrepancy in income and loan proceeds in 13 family and international business bank accounts, thus preventing the forensic evidence errors from the triple counting of deposits in 13 bank accounts by the Lead Fraud Investigator. Instead, he appointed a Junior College Graduate with one semester of accounting as the Director of Fraud to prepare a written fraud report.
- The Director allowed the release of confidential Medicaid and SNAP personal data to the Media for improper use without the permission of Mr. Mahvi and did not take reasonable steps and precautions to enter into Medicaid Integrity Data Sharing Agreements between the County Agency, the County Prosecutor's Office, and WKYC-TV to ensure that the Medicaid recipient's personal data was not released without the consent of the Medicaid Recipient to avoid noncompliance with the USDA Program Discrimination with the Office of the Assistant Secretary of Civil Rights.
- As a responsible attorney, the Director of the JFS knew of credible, and material evidence that while the SNAP Program had terminated assistance for the Mahvi Family in February

2016, the Medicaid Program had *reinstated* Medicaid Benefits to the Mahvi family on May 1 2017, which created a reasonable likelihood that Mr. Mahvi, did not commit an offense – and certainly if he had, it was an unintentional error-for which the defendant, contrary to the nations norms, was later convicted. The Director of JFS County Agency did not promptly disclose the evidence to the legal department of ODJFS and failed to undertake any further investigation to determine whether the Defendant was convicted of an offense that he did not commit, nor did he seek to remedy the conviction after trial. *See* Ohio Professional Conduct Rule 3.8.

- The Director did not instruct his staff to review the document "Improving the Notice of Adverse Actions (NOAAs)" of the US Department of Agriculture, Food, and Nutrition Services dated September 8, 2014, and prepare and submit a NOAA to the Mahvi Household in February of 2016 to terminate SNAP of the Mahvi Family in a fair and transparent manner.
- The Director did not follow the third-party management practices under Medicaid Integrity Program to enter into a Medicaid Integrity Contractor Agreement with a Prosecutor that had experience and training with the Medicaid and SNAP Program. The Director did not verify the credentials of the Prosecutor where he would have discovered that this County Prosecutor had never prosecuted a

Multi-Program Fraud Eligibility (Medicaid and SNAP) Case in his tenure in Geauga County. To Wit: 222 criminal cases in 2013; 230 criminal cases in 2014; 240 criminal cases in 2015; and 207 criminal cases in 2016. Most of the County Prosecutor Cases were decided with guilty pleas. Mr. Mahvi rejected 4 guilty plea offers of the Prosecutor In fact, he was advised by friends at the FBI in Quantico that "this is an inside job orchestrated by Karen Sweet; do not accept any pleas".

d) Common Pleas Judge: Forrest Burt, (Ret.):

- During the secret Case Management Meeting on March 15, 2017, the Trial Judge denied the Mr. Mahvi the right and request to examine his 15 witnesses (lenders and character witness) and to confirm their loan amounts to ensure an accurate Medicaid and SNAP Eligibility Determination and to resolve the discrepancy between loan proceeds and monthly gross income calculation, miscalculated by Karen Sweet.
- The Judge did not institute a standing Brady Disclosure Order to encourage the Prosecutor to disclose promptly favorable evidence to the Defendant. This resulted in the withholding of 100% of the Exculpatory Evidence.

e) ODJFS & ODM

- Failure to supervise the JFS County Agency by scheduling an attorney from the legal department of ODJFS and ODM to be present

on September 1, 2016, with the Lead Investigator to ensure there is competent and reliable forensic audit evidence being presented to the Municipal Judge Terri Stupica in the Search Warrant Affidavit, and that the JFS County Agency use less intrusive means as an alternative to a gunpoint search and seizure with one of the verification procedures OAC 5101:4-2-09 (such as Home Visits to obtain loan and income documents), to address questionable information. Instead, excessive force of 10 policeman were used to surround the home and even forced Mr. Mahvi's youngest son at gunpoint to get off the toilet.

- Failure to supervise the JFS County Agency by scheduling an attorney from the legal department of ODJFS and ODM to Media Blitzes of the Prosecutor to advise the Prosecutor about the rights of Medicaid and SNAP recipients not be discriminated based on national origin or religion in applying for Medicaid and Food Assistance benefits (USDA Program Discrimination Form-3072.

f) Defense Counsel: Brendan Delay.-Weak and Ineffective Assistance of Counsel Defense:

- Brendan Delay was compromised by the 2016 Ohio ODC's investigation into his misconduct with 4 past clients. The ODC issued a Report containing findings of fact and misconduct by Brendan Delay by violating 8 professional conduct rules with 8 of 9 Aggravating Factors

including vulnerability of and resulting harm of the client-victim and dishonest and selfish motive. He was indefinitely suspended from the practice of law as described in Disciplinary Counsel v, Delay Ohio St 3rd 137 2019-Ohio — 2955. This fact, while unknown to Mr. Mahvi, it was known by Prosecutor as of 2017. Mr. Mahvi discovered late 2021.

- Brendan Delay did not act with diligence by responding to the Media Blitzes of the Prosecutor by advising his client about the rights of Medicaid and SNAP recipients not be discriminated based on national origin or religion in applying for Medicaid and SNAP benefits (USDA Program Discrimination Form-3072 and filing a complaint with USDA within 180 days from the discrimination act.
- Brendan Delay did not act with diligence by responding to the order of the Trial Judge in the secret Case Management Meeting prohibiting 15 Character and Lender Witnesses for the Defendant by following the ODJFS 2009 Policies and Procedures to prepare loan documentation affidavits that could be used to resolve the discrepancies between loan proceeds and gross income calculations by the County Agency.
- Lastly at trial Brendan Delay failed to object to the prohibition for the Record, which resulted in the failure of the Appeal.

CONCLUSION

The undersigned Certifies that Ali Pascal Mahvi is factually innocent of the Charges for which he was Wrongfully Convicted, Consequently, the Undersigned respectfully requests that State of Ohio Officials take the following diligent acts:

1. Engage in a robust Medicaid and SNAP Eligibility Determination process improvement effort with the former Medicaid and SNAP Recipient to tackle the Misinformation Problem caused by WKYC-TV and Google and to correct the information in the County Agency Medicaid & SNAP Case File 5110901401.

2. Consider the Resolution Proposal of Mr. Mahvi to help him close his St Lucia stock purchase transaction in manner to meet the objectives:

   (i) State of Ohio to improve Medicaid and SNAP Eligibility Determination processes in Geauga County, and to ensure that the ECR Tax Payments to the Ohio Department of Taxation arising from the international stock purchase transaction are accurate and to prevent erroneous convictions in the future.

   (ii) Mr. Mahvi's business objective to create a justice Fund for Geauga County to remedy an erroneous and wrongful conviction and clear his name that was damaged by Misinformation and Disinformation by WKYC-TV Media and consequently Google during the Medicaid and SNAP Eligibility Deter-

mination Process that erodes trusts and distorts dialogue between international joint venture partners engaged in due diligence investigations with false content and unreasonably delays closings.

(iii) Issue an order to the Media at large to correct the Misinformation and Disinformation by formal retractions of all articles disparaging Mr. Mahvi.

The Evidentiary Documents have been provided to the State of Ohio Officials in earlier Reports of the Undersigned and speaks for itself.

Sincerely Yours

/s/ George N. Vorys
George N. Vorys, MBA, JD