

IN THE COMMON PLEAS COURT OF HURON COUNTY, OHIO
JUVENILE DIVISION

FILED-JOURNALIZED
HURON CO. OHIO

JUL -1 2025

COMMON PLEAS COURT
JUVENILE DIVISION

Johnny Key

CASE NO. SU 2012 00032

Plaintiff(s)

SETS NO: 7090858171

vs.

JUDGE TIMOTHY L. CARDWELL

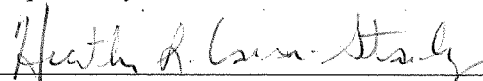
Terra Howard

**MOTION FOR SERVICE BY
POSTING**

Defendant

Now come the Plaintiffs herein, by and through the Title IV-D Attorney for the Huron County Child Support Enforcement Agency (CSEA), and pursuant to Rule 16(A) of the Ohio Rules of Juvenile Procedure and the Huron County Juvenile Court Local Rule 69 and request that service of summons and process be made upon the Defendant by Posting as authorized by Ohio Revised Code Section 2151.29. Certified mail service and personal service by sheriff has been attempted in this case and addresses for the Defendant are unknown and cannot, with reasonable diligence, be ascertained. Please see the attached Affidavit in support of this request.

Respectfully submitted,



Heather L. Carman-Stanley (0072107)

Title IV-D Attorney

Huron County CSEA

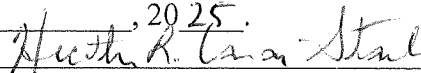
185 Shady Lane Dr.

Norwalk, OH 44857

(419) 668-8126

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing Motion for Service by Posting was sent to, Johnny Key Plaintiff, located at 128 Overstone Dr, Rutherfordton, NC 28139-0000 by First Class U.S. Mail, this 30th day of June, 2025.



Heather L. Carman-Stanley (0072107)

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CASE NO. SU 2012 00032

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Terra Howard

Defendant

PRAECIPE FOR SERVICE
BY POSTING

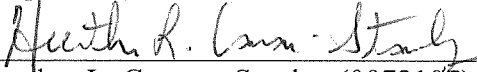
.....
PURSUANT TO LOCAL RULE 69 AND JUVENILE RULE 16(A)

TO THE CLERK: Please cause service upon Terra Howard by posting and mail pursuant to Local Rule 69 and Juvenile Rule 16(A) by:

1. Directing this party, Huron County CSEA, by and through the Title IV-D Attorney, to post the notice (a copy of which is attached) in a conspicuous space for a period of a minimum 7-day consecutive period at each of the following locations:
 - a) The Juvenile Court of Huron County, Ohio located at 2 East Main Street, 1st Floor, Norwalk, Ohio 44857.
 - b) The Huron County Department of Job and Family Services located at 185 Shady Lane Dr., Norwalk, OH 44857.
 - c) The Huron County Office Building located at 12 East Main Street, Norwalk, Ohio 44857.
 - d) The Huron County Juvenile and Probate Court Website, www.hcjpc.com.
2. Causing a Summons and the attached pleadings to be mailed by regular U.S. Mail, address correction requested, to Terra Howard, 32 Woodlawn Ave Apt B, Norwalk, OH 44857-3205 and 13 Cline St, Norwalk, OH 44857-1005.
3. Obtaining a certificate of mailing from the United State Postal Service. If the Clerk is then notified of a corrected or forwarding address within the seven-day period that the notice is posted, then the Clerk shall cause the Summons and accompanying pleadings to be mailed to the corrected or forwarding address; and
4. After the seven days of posting:
 - a) Note the name and address and date of each mailing on the docket; and
 - b) Note on the docket where and when the notice was sent.

In accordance with Local Rule 69 and Juvenile Rule 16(A), the required affidavit is attached.

Respectfully submitted,

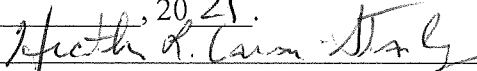


Heather L. Carman-Stanley (0072107)

Title IV-D Attorney
Huron County CSEA
185 Shady Lane Dr.
Norwalk, OH 44857
(419) 668-8126

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing Motion for Service by Posting was sent to Johnny Key, Plaintiff, located at 128 Overstone Dr, Rutherfordton, NC 28139-0000 by First Class U.S. Mail, this 30th day of June, 2025.



Heather L. Carman-Stanley (0072107)

HURON COUNTY CSEA
185 SHADY LANE DRIVE

NORWALK, OH 44857-2388

POSTMASTER

NORWALK, OH 44857-1005 USA

RECEIVED
JUL 27 2005
Huron County Dept. of Job & Family Serv.
Phone Number: 419-668-9152
Toll Free Number: 800-668-9152
Fax Number: 419-668-4738

Case #: 7122839322

Date: 06/17/2025

Address Information Request

Please furnish this agency with the new address, if available, for the following individual or verify whether or not the address given below is one at which mail for this individual is currently being delivered. If the following address is a post office box, please furnish the street address as recorded on the box holder's application form.

Name: TERRA L. HOWARD
Last Known Address: 13 CLINE ST
NORWALK, OH 44857-1005 USA

I certify that the address information for this individual is required for the performance of this agency's official duties.

Cheyenne L. Haymond
CHEYENNE L. HAYMOND
Authorized Representative

For Post Office Use Only

- ☒ Mail is delivered to address given
☐ Not known at address given
☐ Moved, left no forwarding address
☐ No such address
☐ Other (Specify)

New Address:

Boxholder's Street Address:

Postmark/Date Stamp

HURON COUNTY CSEA
185 SHADY LANE DRIVE

NORWALK, OH 44857-2388

POSTMASTER

NORWALK, OH 44857-3205 USA

Phone Number: 419-668-9152

Toll Free Number: 800-668-9152

Fax Number: 419-668-4738

Case #: 7122839322

Date: 06/17/2025

Address Information Request

Please furnish this agency with the new address, if available, for the following individual or verify whether or not the address given below is one at which mail for this individual is currently being delivered. If the following address is a post office box, please furnish the street address as recorded on the box holder's application form.

Name: TERRA L. HOWARD

Last Known Address: 32 WOODLAWN AVE APT B

NORWALK, OH 44857-3205 USA

I certify that the address information for this individual is required for the performance of this agency's official duties.

Cheyenne L. Haymond

CHEYENNE L. HAYMOND

Authorized Representative

For Post Office Use Only

☒ Mail is delivered to address given

☐ Not known at address given

☐ Moved, left no forwarding address

☐ No such address

☐ Other (Specify)

New Address:

Boxholder's Street Address:

Postmark/Date Stamp

Huron County Common Pleas Court
Juvenile Division
Norwalk, Ohio

John Key

Plaintiff

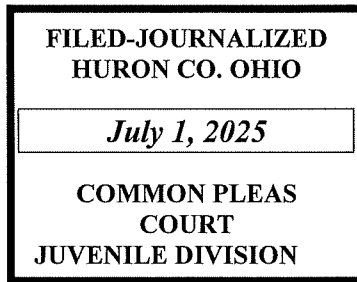
vs.

Terra Lynn Howard

Defendant

posting: defendant

Email: CSEA



Case Number: SU 2012 00032

Date: 1 July 2025

SETS No. 7090858171

JUDGMENT / NOTIFICATION

This cause came to be heard on March 7, 2025, upon the Motion To Show Cause (Second Contempt) filed by Ms. Heather Carman-Stanley, Title IV-D Attorney, Huron County CSEA requesting that **TERRA LYNN HOWARD** be required to appear personally before this Court to show cause why he/she should not be punished for failure to comply with the former orders of this Court.

The Court finding said motion well-taken, it is hereby ordered, adjudged and decreed that **TERRA LYNN HOWARD** appear in person before the Huron County Juvenile Court, 2 East Main St., Room 101, Norwalk, OH 44857 on **FRIDAY, AUGUST 8, 2025, AT 8:15 AM** for a **TRIAL BEFORE THE COURT** to show cause why he/she should not be punished for contempt of Court for failure to comply with the former orders of this Court.

You are further notified that:

1. Failure to appear may result in the issuance of an order for your arrest.
2. You have a right to counsel and if you believe that you are indigent, you must apply for a public defender or court appointed counsel within three (3) business days after receipt of summons.
3. The court may refuse to grant continuance at the time of the hearing for the purpose of obtaining counsel if you fail to make a good faith effort to retain counsel or to obtain a public defender.
4. If you are found guilty of contempt for failure to pay support, or comply with a court order of visitation, the court may impose any of the following penalties:
 - a. FIRST OFFENSE: a fine of not more than \$250.00, a definite term of imprisonment of not more than 30 days in jail, or both.
 - b. SECOND OFFENSE: a fine of not more than \$500.00, a definite term of imprisonment of not more than 60 days in jail, or both.
 - c. THIRD OFFENSE: a fine of not more than \$1,000.00, a definite term of imprisonment of not more than 90 days in jail, or both.
5. If you are found guilty of contempt on other grounds, the Court may impose a term of imprisonment, fine, or both.
6. If your driver's license has been administratively suspended by a child support enforcement agency, you may request the Court to grant you limited driving privileges. When making this request you must also submit a recent copy of your driver's abstract from the registrar of motor vehicles.

A handwritten signature in black ink, appearing to read 'Timothy L. Cardwell'.

Timothy L. Cardwell, Judge

MAR 07 2025

COMMON PLEAS COURT
JUVENILE DIVISION

IN THE COURT OF COMMON PLEAS
JUVENILE DIVISION
HURON COUNTY, OHIO

Johnny Key

Plaintiff

vs.

Terra Howard

Defendant

CASE NO.: SU 2012 00032

SETS NO: 7090858171

JUDGE: TIMOTHY L. CARDWELL

MOTION TO SHOW CAUSE

(Second Contempt)

Now comes Heather L. Carman-Stanley, Title IV-D Attorney for Huron County Child Support Enforcement Agency and respectfully requests this Honorable Court for an order citing the Defendant, **Terra Howard**, for contempt for her failure to make payments upon the accrued child support arrearages at an amount previously ordered.

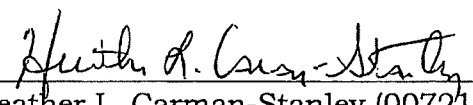
Additionally, the Title IV-D Attorney respectfully requests this Court to issue an order citing Defendant for contempt for failing to notify the Huron County CSEA of any changes in her address, employment, and financial information.

Additionally, the Title IV-D Attorney respectfully requests this Court to issue an order requiring Defendant to appear and to show cause why she should not be held in contempt.

Additionally, Obligor should be advised that her ability to pay constitutes a critical question in a civil contempt action.

A Memorandum in support is attached hereto and made part hereof.

Respectfully submitted,


Heather L. Carman-Stanley (0072107)
Title IV-D Attorney
Huron County CSEA
185 Shady Lane Drive
Norwalk, Ohio 44857
(419) 668-9152

MEMORANDUM

The Plaintiff, **Johnny Key**, is a recipient of services from the Huron County Child Support Enforcement Agency (HCCSEA) in accordance with Title IV-D of the "Social Security Act", 42 U.S.C. 651 (1975), as amended.

In a **Judgment Entry** dated **July 28, 2020**, this Court ordered Defendant to pay upon her current child support for parties' child at a rate of **\$167.88** per month, plus **\$0.00** for cash medical support per month, plus **\$25.00** per month for payment on arrears, plus **\$3.86** per month for administrative fees, to Plaintiff through Huron County CSEA until the accrued arrearage is paid in full.

It is the finding of the Title IV-D Attorney that Defendant has failed to make timely payments on her accrued child support arrearage. See, Affidavit of Huron County Child Support Agency Investigator, attached as Exhibit A.

The Title IV-D Attorney further states that as a result of nonpayment, Defendant has accrued an arrearage on the instant case of **\$1152.45** as of **March 6, 2025**, of this total, **\$1051.78** is owing to obligee, **\$0.00** is owing to the State of Ohio and **\$100.67** is owing to Huron County CSEA for administrative fees. See, Exhibit A.

The Title IV-D Attorney further states that Defendant has failed to notify Huron County CSEA of any changes in her address, employment, and financial information.

WHEREFORE, the Title IV-D Attorney respectfully requests this Honorable Court to find Defendant in contempt of court pursuant to O.R.C. §2705.02(A) and 3113.06, for her failure to make timely payments on the accrued child support arrearage.

It is further requested that this Honorable Court find Defendant in contempt of court for failing to immediately notify HCCSEA, in writing of her employment status as required by O.R.C. §3121.

It is requested that this Court, pursuant to O.R.C. §3121.03(D)(1) issue an order requiring the Defendant, when not gainfully employed for any length of time, to report to the Huron County Ohio Means Jobs Program, apply for services and fully participate in said program. Should Defendant not be eligible for such services, require Defendant to seek work at no less than ten (10) employers per week and report her efforts weekly to HCCSEA on the forms they provide.

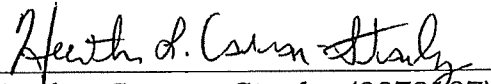
It is requested that this Court, pursuant to O.R.C. §3121.03(D)(1), issue an order requiring Defendant to notify HCCSEA upon obtaining employment, obtaining any income, or obtaining ownership of any asset with a value of five hundred dollars (\$500.00) or more.

It is further requested that this Court, pursuant to O.R.C. §3121.05, order Defendant to establish a bank account at a financial institution of her choice that child support funds may be deducted from monthly; keep on account funds equal to two (2) months full child support obligation, inclusive of payment on arrears and administrative

fees; and notify HCCSEA within 24 hours of the routing and account number and location of said account.

It is further requested that this Honorable Court find Defendant in contempt of court for failing to abide by previous orders and sentence Defendant to **60 days** of incarceration in the Huron County Jail and require Defendant to pay all costs incurred to bring this action.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Heather Carman-Stanley", is written over a horizontal line.

Heather Carman-Stanley (0072407)
Title IV-D Attorney
Huron County CSEA
185 Shady Lane Drive
Norwalk, Ohio 44857
(419)668-9152

PRAECIPE

TO THE CLERK OF COURT:

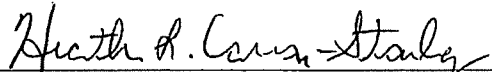
Please cause service of a true copy of the forgoing Motion to Show Cause to be served upon **Terra Howard**, Defendant, located at **32 Woodlawn Ave Apt B Norwalk, OH 44857-3205** by **Certified US Mail**, pursuant to Rule 4.6 of the Ohio Rules of Civil Procedure.



Heather L. Carman-Stanley (0072107)
Title IV-D Attorney
Huron County CSEA

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the forgoing Motion to Show Cause was sent to **Johnny Key**, Plaintiff, located at **128 Overstone Dr Rutherfordton, NC 28139-0000** via First Class U.S. Mail, this 6th day of March, 2025.



Heather L. Carman-Stanley (0072107)
Title IV-D Attorney
Huron County CSEA

EXHIBIT A

STATE OF OHIO) SS:
COUNTY OF HURON)

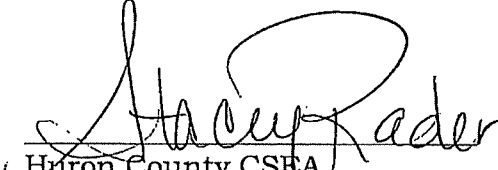
AFFIDAVIT

Now comes the undersigned, **Stacey Rader**, for the Huron County Child Support Enforcement Agency (CSEA) and, after first being duly sworn and cautioned according to law, hereby deposes and states as follows:

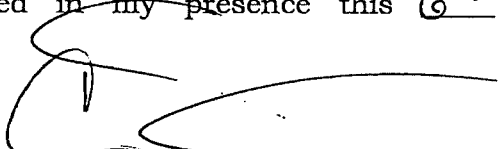
1. That the records of the Huron County CSEA indicate that Defendant, **Terra Howard** has failed to comply with this Court's orders requiring Defendant to:

☒ make ordered payment upon current child support;
☒ make ordered payment upon accrued child support arrears; and
☒ notify Huron County CSEA of changes in her address and employment.
2. That the records of the Huron County CSEA further indicate that Defendant has failed to timely remit child support payments; and therefore has an arrearage in her support obligations of **\$1152.45** as of **March 6, 2025**.
3. That Huron County CSEA conducted a review regarding Obligor's ability to pay and determined that a final and enforceable determination of default has been made against Obligor, that Obligor does not have a pending personal bankruptcy action, that Obligor is not receiving any protected benefits pursuant to OAC 5101:12-50-10. Further, Huron County CSEA conducted research into any and all income Obligor may or may not be receiving that is subject to a withholding or deduction.

Further Affiant sayeth naught.


Huron County CSEA

Sworn to before me and subscribed in my presence this 6th day
of March, 2025.


Notary Public CHARLENE D STEFFANNI
Notary Public
State of Ohio
My Comm. Expires
Commission Expiration Date

IN THE COMMON PLEAS COURT OF HURON COUNTY, OHIO
JUVENILE DIVISION

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JUL -1 2025

COMMON PLEAS COURT
JUVENILE DIVISION

Johnny Key

Plaintiff(s)

CASE NO. SU 2012 00032

SETS NO: 7090858171

vs.

Terra Howard

JUDGE TIMOTHY L. CARDWELL

Defendant

AFFIDAVIT FOR POSTING

STATE OF OHIO) SS:
COUNTY OF HURON)

I, Cheyenne Haymond, do hereby swear and affirm as follows:

1. A Motion to Show Cause was filed with this Court on 03/07/2025.
2. Defendant, Terra Howard, is a necessary party to this case and as such needs to be served with notice of said action.
3. Several attempts have been made to perfect service upon Defendant via Certified Mail and Personal Service by Sheriff.
4. The current address and whereabouts of Defendant are unknown to affiant and cannot be ascertained by due diligence.
5. By reason of the foregoing, service of summons upon Defendant cannot be made by personal service or by means of certified or registered mail.
6. Affiant further states that this affidavit is made to obtain Service by posting as required by Civil Rule 4.4(A)(2).

Further affiant sayeth naught.

Chrymme Haymond
Huron County CSEA Caseworker

Sworn to before me and subscribed in my presence this 30 day of
June, 2025.

Stacey L. Rader
Notary Public

STACEY L. RADER
NOTARY PUBLIC, STATE OF OHIO
My Commission Expires 9/23/2029
Commission Expiration Date