

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

**FILED**  
UNITED STATES DISTRICT COURT  
DENVER, COLORADO

SEP 05 2018

JEFFREY P. COLWELL  
CLERK

RAYMOND R. SCHWAB  
AMELIA D. SCHWAB

*Plaintiffs,*

v.

CASE NO. 2018cv02190 6P6

VIOLATION OF CIVIL RIGHTS  
(42 U.S.C. § §1983), FRAUD,  
SLANDER, INTERFERENCE WITH  
LAWFUL PARENTAL CUSTODY.  
JURY TRIAL DEMANDED

KRIS KOBACH in official and individual capacity

KANSAS DEPARTMENT OF CHILDREN AND FAMILIES.

KIM YOXELL in official and individual capacity,

ANGIE SUTHER in official and individual capacity

PHYLLIS GILMORE in official and individual capacity,

THERESA FREED in official and individual capacity

KENDRA BAKER in official and individual capacity.

RANDY DEBENHAM in official and individual capacity

BLAKE ROBINSON in individual and professional capacity,

ANDREW VINDUSKA in individual and professional capacity,

MIRANDA JOHNSON in individual and professional capacity,

LORA INGLES in individual and professional capacity,

BARRY WILKERSON in professional and individual capacity,

BETHANY FIELDS in individual and professional capacity,

RILEY COUNTY POLICE DEPARTMENT

CARLA SCHWARTZ in personal and professional capacity

JULIA GOGGINS in personal and professional capacity

KVC A 501c3 Nonprofit Organization,

RHONDA EISENBAREGER in professional and personal capacity

DEJA JACKSON in personal and professional capacity

PATHWAYS FAMILY SERVICES, LLC

PAWNEE MENTAL HEALTH SERVICE

SUNFLOWER CASA PROJECT 501c3 non profit entity

ST FRANCIS COMMUNITY SERVICES 501c3 non profit entity.

KATHY BOYD in individual and professional capacity,

LAURA PRICE in individual and professional capacity,

KAYLEE POSSEN in individual and professional capacity

ANTHONY ALLISON in individual capacity

MICHELLE ALLISON in individual capacity

AMANDA ALLISON-BALLARD in individual capacity

DOES 1-10 Inclusive,

*Respondants.*

---

RESPONSE TO SHOW CAUSE AND ORDER TO CURE DEFICIENCY

---

Plaintiffs, RAYMOND AND AMELIA SCHWAB (THE SCHWAB'S) filed an initial complaint for civil rights violations, and other offenses against the above defendant's August 27 2018. This Court subsequently responded by ordering the Plaintiff's to submit their complaint on the Court approved form, and respond in writing why Colorado was the appropriate venue to hear the above case due to many of the offenses occurring in Kansas by Kansas citizens or corporations.

The Schwab's believed the venue of Colorado is appropriate in that while the initial seizure of the children, as well subsequent hearings occurred in Kansas many of the offenses occurred across State lines. The Schwab's have been Citizens of Colorado since May of 2015 for Mrs. Schwab and July of 2015 for Mr. Schwab. Rather than the offenses being committed in Kansas, as this Court suggested, the Schwab's come from the idea that these were actions committed by Citizens or Entities of Kansas

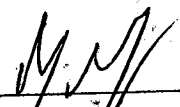
upon citizens of Colorado.

Many of the actions of the defendant's, including false light, violations of due process, and fraud occurred in the State of Colorado as well as Kansas which led the Schwab's to believe Colorado was an appropriate venue. However, for the sake of expediency and in the interest of justice the Schwab's hereby request that this court transfer the venue of these proceedings to the U.S. District Court of Kansas in Sedgwick County located at 401 N Market St Wichita, KS 67202 per 28 U.S.C 1406 (a).

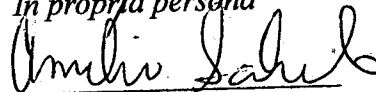
By transferring to this venue the Court will eliminate both the deficiencies in the filing as well as not prolonging these proceedings by any other challenges to venue by the Defendant's. While the Plaintiff's have submitted the appropriate form with this motion to be added to the former complaint, the Plaintiff's know that the current claim is in the proper format to be accepted in the venue of the Kansas District as it is in the form submitted under previous litigation without any notice of deficiencies.

In the interest of justice the Plaintiff's ask this Court to transfer venue, with the complaint and application to proceed without the prepayment of fees to the District of Kansas, in Wichita Kansas that these proceedings are not further delayed as the Schwab's seek relief from the Constitutional violations and harm done to their family.

Signed this 4<sup>th</sup> Day of September 2018

/S/ 

RAYMOND SCHWAB  
*In propria persona*

/S/ 

AMELIA SCHWAB

*In propria persona*

Notice of Mailing

This response to order to correct deficiency and response to show cause was mailed to the US District

Court Clerk September 4, 2018 at

US District Clerk of Court

901 19th St, Denver, CO 80294

166-1524  
 ETP:1 PD:MR:100:Y 7E26C 692628  
 80294-2500-99  
 G  
 US DISTRICT COURT CLERK  
 DE NVL R, CO  
 801 19TH ST  
 W 240 04:31 FN-1D 3102971

FROM: Raymond Schwab (970) 402-7230  
 5232 GLADE RD  
 LOVELAND CO 80538  
 US  
 TO US DISTRICT COURT CLERK  
 901 19TH ST  
 DENVER CO 80294  
 REF: (411) 111-1111  
 DEPT: 100: 100: 100:

SHIP DATE: 04SEP18  
 ACTW: 10 LB  
 CAD: 690607/SSF01904  
 DIMED: 12 X 9 X 1 IN

PMP# 782207455 RRDB EXP 07/19  
 (US)

Fedex Ground  
 G

TRK# 7826 0692 5528  
 80294

9622.0019.0.(000.000.0000) 0 00 7826 0692 5528



