

IN THE COURT OF APPEALS OF OHIO
SECOND APPELLATE DISTRICT
MONTGOMERY COUNTY

STATE OF OHIO ex rel.
OHIO ATTORNEY GENERAL

Case No.

Relator,

v.

ORIGINAL ACTION IN QUO
WARRANTO

ADIL BAGUIROV,

Respondent.

HEARING REQUESTED

ORIGINAL ACTION IN QUO WARRANTO

Name, #
Assistant Attorney General
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ATTORNEY FOR OHIO
ATTORNEY GENERAL

Adil Baguirov

Relator, Mike Dewine, as the duly elected Attorney General of the State of Ohio, brings this quo warranto action pursuant to Ohio Revised Code 2733.05. A quo warranto action is the proper pleading and procedure to challenge the legal right of another to public office. *Beasley v. City of E. Cleveland*, 20 Ohio App.3d 370 (8th Dist. 1984). Article IV, Section 3 of the Ohio Constitution vest the courts of appeals with original jurisdiction for quo warranto actions. *Id.* Accordingly, Relator is alleging that Respondent, Dr. Adil Baguirov, is holding the public office of Dayton Board of Education member illegally. Specifically, Relator alleges as follows:

1. The Dayton Public Schools Board of Education (the “Board”) is a 7 member board charged with the organization, administration, and control of the City of Dayton’s public schools. It is authorized by Article IV, Section 3 of the Ohio Constitution, and it is organized under Chapter 3313 of the Ohio Revised Code.
2. All members of the Board are required to reside within the Dayton School District.
3. 111 Cooper Place W., Dayton, OH 45402 is a modest home within the Dayton School District. (Exhibit A).
4. 111 Cooper Place W., Dayton, OH 45402 is owned by Metropolis LLC, a Wyoming Limited Liability Company. (Exhibits A & B).
5. Respondent is a member of Metropolis LLC. (Exhibit B).
6. Respondent falsely claims to reside at 111 Cooper Place W., Dayton, OH 45402.
7. Respondent is not registered to vote at 111 Cooper Place W., Dayton, OH 45402.
8. Metropolis Holdings LLC is an Ohio Limited Liability Company. (Exhibit C).
9. Metropolis Holdings LLC only member is ATB 2015 Trust. (Exhibit C).

10. Respondent signed Metropolis Holding LLC's articles of organization on behalf of ATB 2015 Trust. (Exhibit C).
11. Respondent's wife, Sevin Baguirov, is Metropolis Holding LLC's registered agent. (Exhibit C).
12. Metropolis Holdings LLC lists its mailing address as 111 Cooper Place W. Dayton, OH 45402. (Exhibit C).
13. Metropolis Holdings LLC owns a single family residential property located at 8 Meeker Place, Dayton, OH 45402. (Exhibit D).
14. 8 Meeker Place, Dayton, OH 45402 has an appraised value of \$498,990. (Exhibit D).
15. 8 Meeker Place, Dayton, OH 45402 is located in the Vandalia-Butler School District. (Exhibit D).
16. Respondent actually resides at 8 Meeker Place, Dayton, OH 45402.
17. Respondent changed his voting registration at some point before the 7 November 2017 election to 8 Meeker Place, Dayton OH 45402.
18. Respondent failed to notify the Dayton Public Schools Board of Education that he had changed his official registration.
19. Respondent resides outside of the Dayton School District.
20. Because Respondent lives outside of the Dayton School District, he is not eligible to serve on the Board and is holding the office illegally.

Wherefore, Relator, for and in the name of the people of the State of Ohio, requests that Respondent be required to show by what warrant, right, or authority he holds and exercises

the public office of Dayton Public School Board member, and that if he does not disclaim or justify, that this Court remove him from the office.

Relator requests a hearing on this matter.

Respectfully submitted,

Mike DeWine
Ohio Attorney General

By: _____