
STATE OF OHIO)
)
) SS: R.C. § 2935.09 & .10 Affidavit of Accusation
)
COUNTY OF MEDINA)

INTRODUCTION OF AFFIANT

01. I, Ronald R. Stanley, Affiant in the instant matter, having been duly advised of the penalty of perjury under the laws of the State of Ohio, declare that I am mentally fit and competent to testify, that I have direct personal knowledge of and to support the facts contained hereinafter, and that these facts are true and accurate to the best of my knowledge, beliefs and experiences.
02. I am submitting this Affidavit of Accusation to report the rape of a prepubertal child that occurred in Put-In-Bay, Ottawa County, Ohio on October 1st-3rd of 2004.
03. I am a legal resident of Medina County, Ohio.
04. I am an attorney licensed to practice law in the State of Ohio.
05. My Ohio Supreme Court Registration Number is (#0040766).
06. I am in good standing with the Ohio Bar Association.
07. My contact information is:
- | | |
|-------------------|-----------------------|
| Ronald R. Stanley | 330-952-1415 Phone |
| Attorney at Law | 330-952-1416 Fax |
| P.O. Box 571 | Legal50@aol.com Email |
| Medina, OH 44258 | |
08. This Affidavit of Accusation ("Affidavit") is being submitted in *good faith* consistent with all manner of applicable law, evidence and witnesses.
09. It is my most sincere desire that this Affidavit will aid in the furtherance of both the

administration of and the ends of justice.

10. I am submitting this Affidavit of my own free will.
11. I am acting in a *pro bono* capacity.
12. I represent the interests of my client: Frank P. Wood ("Wood").

CHILD VICTIM

13. The crime has to do with the rape of a female child under the age of 10 pursuant to R.C. § 2907.02(A)(1)(b)(B) (<10) (F-1). The child victim is Samantha Lazard ("S.L."); the legal guardian daughter of Scott Michael Sadowsky ("Scott") and Danielle Marie Sadowsky ("Danielle"), (n.k.a. Danielle Marie Smith). Danielle is married to Brad Smith and currently lives in Medina, Ohio.
14. S.L. is currently married to a Harold Dobrinski. They recently moved from Wycliffe, Ohio and now live in Canton, Ohio.

SOURCE DATA

15. The evidence of this crime came about during Wood's Trial. The case itself originated as State of Ohio, Plaintiff vs. Frank P. Wood, Defendant, Medina County Case No. 05CR0365. The Trial took place in the courtroom of Judge Christopher J. Collier ("Judge Collier"), of the Medina County Court of Common Pleas, between April 24-28 and May 1, 2006.
16. When the evidence surfaced at Trial, Judge Collier should have recused due to a true and valid lack of subject matter jurisdiction, and bonded this case over to the Ottawa County Prosecutor's Office. In all actuality, the Trial Court forfeited venue through the lack of subject matter jurisdiction. Clarifying, the jurisdiction of the offense was gone and the Court had no right to proceed any further in the progress of the F-1

portion of Wood's Trial for "want of indictment." United States vs. Cotton (2002), 535 U.S. 625, 629; citing Ex parte Bain, 121 U.S. 1, 13, 30 L. Ed. 849, 7 S. Ct. 781 (1887).

TRANSCRIPT OF PROCEEDINGS

17. I have included a copy of the Transcript of Proceedings from Wood's Trial, minus internal Exhibit(s), as (Exhibit-A). (See: **Appendix-A**: Exhibits 'A' through 'L').
18. Regarding the Trial Record, evidence exists proving that it remains materially altered and incomplete. (See: Merit Affidavit of Frank P. Wood; August 28, 2018; A Blueprint for Wrongful Imprisonment¹ ("A Blueprint for Wrongful Imprisonment") on the accompanying **Flash-Drive** labeled "**Wood**"). Presented as an *evidentiary submission*,² it is highly detailed and easy to follow. I know because I read it.³
19. Regarding the altered State-court Record, there are at least 24 verifiable material alterations, deletions and *missing sections* noted in Wood's affidavit/book. As a highly specific example, see Ch.42, p.401-405, ¶1204-¶1214.
20. The copy of the Record submitted is the minimized version that Wood received from the Ohio Attorney General in 2008.⁴
22. As the Reader of this Affidavit and A Blueprint for Wrongful Imprisonment will note, all evidence submitted is in the form of State, Court or public records.
22. Supporting, all evidence submitted or referenced is *pertinent* to this Affidavit.

¹ Eventually the affidavit/book will be available at **www.free frankpwood.com** where it can be downloaded in the form of nine (9) consecutive *Google* files.

² Wood's affidavit, also written as a book, is 877 pages in length with 86 Exhibit(s), save one (1), comprising 329 of those pages.

³ **CAVEAT**: Wood is extremely bold and direct in his publication, but he has completely reverse-engineered every element of his wrongful conviction, and has successfully proven that **two (2) perpetrators run free, inter alia**.

⁴ A Blueprint for Wrongful Imprisonment: Ch.34, p.339, ¶1035.

PERPETRATOR

23. As will be shown, the rape was committed by **Scott Sadowsky**: S.L.'s legal guardian father (Tp.179, Ln.20-23); (Exhibit-B: Facebook picture of Scott Sadowsky)⁵ {104}.
24. For locating Scott:
- i. His former address is 5855 Jonathan Court, Medina, Ohio, 44256 (Tp.179, Ln.13-14)
 - ii. He still lives in somewhere in Ohio and works in the Akron, Ohio area
 - iii. He has a history of working in "sales" (Tp.180, Ln.19-20)
 - iv. His date of birth is May 3, 1968
25. To the best of Wood's memory, Scott's full name is **Scott Michael Sadowsky**.

RELATIONSHIP FACTS

26. At the time of the crime, Scott was married to Danielle: S.L.'s legal guardian mother (Tp.84, Ln.1-7). Scott and Danielle received "relative placement" of S.L. early in 1999 (Tp.180, Ln.14-15).⁶

Frank P. Wood

27. Wood is wrongfully imprisoned for this crime and has been since May 15, 2006 in direct violation of is *Human & Constitutional Rights* and against *Law & Fact*.
28. I have known Wood for nearly 20 years. He verbally retained me to sit as Co-counsel: "second chair" (Tp.124, Ln.15-16). In this position, I served as a translator for Wood as I explained what was transpiring during Trial, and I served as a buffer between him and his retained Lead-counsel F. Harrison Green ("Atty. Green"). His contact information is:

⁵ A Blueprint for Wrongful Imprisonment: (Exhibit-16).

⁶ A Blueprint for Wrongful Imprisonment: Ch.09, p.49, ¶179, 3, i, (Exhibit-81: p.2, ¶2).

F. Harrison Green
4015 Executive Park Drive
Executive Park, Suite 230
Cincinnati, OH 45421

29. Atty. Green refused to work with me on or inform me of any trial strategy.
30. For justifiable reasons stated below {107, 124-125},⁷ Wood does **NOT** trust Atty. Green.
31. As “second chair” I did not actively engage in the Trial Process, i.e., I did not help prepare documents, advise, or cross-examine witnesses.

32. Consistent with the Supreme Court of Ohio's decision in State ex rel. Capron v. Dattilio, 2016-Ohio-1504, [P**3],

33. Not only am I a **“private citizen”** filing this Affidavit, as Wood’s Co-counsel at Trial, I am also an eyewitness to the majority of the evidence presented.
34. In conjunction with the above, pursuant to R.C. 2935.10(A) Procedure upon filing of affidavit or complaint,

⁷ { } will be used for cross-referencing paragraphs in this Affidavit.

forthwith refer the matter to the prosecuting attorney or other attorney charged by law with prosecution for investigation prior to the issuance of warrant.

35. As to the applicable statutes of limitations regarding this matter, pursuant to

R.C.2901.13 Limitation of prosecutions, Section (4) states:

Except as otherwise provided in divisions (D) to (L) of this section, a prosecution of a violation of section 2907.02 or 2907.03 of the Revised Code or a conspiracy to commit, attempt to commit, or complicity in committing a violation of either section shall be barred unless it is commenced within **twenty-five years** after the offense is committed [**emphasis added**].

With the commission of the offense occurring in October of 2004, the presentation of this Affidavit is well within the statutory time frame.

AMENDED BILL OF PARTICULARS

The alleged F-1 rape allegation

36. To confirm the dates of the offense, I have included Wood's Amended Bill of Particulars ("BOP") as (Exhibit-C). Further, as the Reader will note, there are two (2) unrelated allegations in the BOP: 1) F-1 rape; and 2) F-3 gsi. Also, please note that the exact location of both bogus allegations remain unmentioned.
37. Continuing, about six (6) weeks prior to Trial, on April 12th of 2006, former Assistant Prosecutor Anne Eisenhower ("Pros. Eisenhower") filed the Amended BOP verifying that Wood was formally charged regarding two (2) separate and distinct alleged crimes/victims. As the alleged victims never lived with Wood at the same time, we now have two (2) separate and distinct cases. Confirming, the BOP reveals that
- i. The allegations are separated by a five-year spread: 2000-2005, according to the BOP, and therefore are chronologically unrelated
 - ii. Both incidents were alleged to have occurred in two (2) separate and distinct,

but **unspecified** locations, inside of Medina County, Ohio: a fiction in regards to Wood

38. Tying a few facts together, the original BOP alleged the F-1 to have occurred between October 1st-31st of 2005. It was Pros. Eisenhower who deliberately *amended* the BOP to October 1st-3rd of 2005 to secure “A life rape, Your Honor” (Tp.17, Ln.21-24). The State then prosecuted and tried Wood according to these highly specific and narrowed-down dates. This was their *pinpoint choice* with reason.
39. With allegations for October 20th deliberately removed from the charging instrument, Pros. Eisenhower also confirmed that there were “No supplemental indictments” (Tp.17, Ln.16-17). Therefore, there was **no indicted continuous course of criminal conduct** tying Ottawa County and Medina County together {103}. This renders the rape allegation for October 1st-3rd a *stand-alone charge*.
40. Clarifying dates, the original indictment did state “Two Thousand Four” (Exhibit-D).

The unrelated F-3 allegation

41. The alleged F-3 concerned K.S.: the daughter of Wood’s former wife: Robyn Spencer-Speelman (“Robyn”).
42. Unbeknownst to Wood, K.S. came home from school after a “good touch, bad touch” class between “July and September of 2004” (Tp.421, Ln.24-Tp.422, Ln.2) and claimed someone had improperly touched her between “August and October of 2000” (Exhibit-C). With her D.O.B. being 2/09/96 (ibid), K.S. would have been approximately four-and-a-half (4 ½) years old at the time of the alleged incident, and eight-and-a-half (8 ½) years old at the time of disclosure. A remarkable memory for this child to narrow down a three (3) month period out of nine (9) years of her young

life. Especially from four (4) years prior.

43. In “May of 2005” Wood ceased all financial support to Robyn (Tp.380, Ln.13-Tp.381, Ln.6). Soon afterwards, Robyn took K.S. to MCJFS and “not the police” {56} on June 16, 2005 (Tp.365, Ln.21-Tp.366, Ln.3). As four-and-a-half (4 ½) years lapsed between alleged incident and disclosure, nearly a year lapsed between disclosure and reporting: when the money stopped. *Money*: an archaic and eternal motive.
44. Continuing, after K.S. testified **twice** that she could not recall being at an alleged crime scene with Wood (Tp.386, Ln.18-21; Tp.387, Ln.9-11), the Trial Court admitted, “What I’m hearing her say is, “No, it didn’t happen” (Tp.390, Ln.4-5). Unfortunately, Pros. Eisenhower declared, “I’m telling you that I made a **pact** with her” [**emphasis added**] (Tp.394, 17-18), and Judge Collier⁸ permitted the recalling of this alleged victim.⁹
45. Making a “**pact**” with a State-child witness/victim during trial, *ex parte*, is a violation of Title 18 U.S.C.S. § 1512 Tampering with a witness, victim, or informant, §§ (b)(1)(j)(k).

CONTENTS

46. Should anyone seek to challenge the evidence presented, it must be made clear that this presentation is not merely an interpretation of the facts. To the contrary, I have presented State-proffered and -proven TRIAL FACTS in the chronological order in which the events were testified to having had occurred. Verifying, the core of this

⁸ Judge Collier recused from Wood’s case on February 27, 2015.

See: A Blueprint for Wrongful Imprisonment: Ch. 42, p.397-399, ¶1179-¶1194, (Exhibit-59).

⁹ A Blueprint for Wrongful Imprisonment: Ch.29, p.219-225, ¶684-¶723.

Affidavit: **a crime occurred in Put-In-Bay, Ohio**, is comprised solely of State's best and direct evidence from the face of the State-court Record. Therefore, at this juncture, State-court fact findings favoring this Affidavit and its claim are entitled to the same presumption of correctness due findings favoring any challenger (Burden v. Zant, 498 U.S. 433 (1991) (per curiam)), especially when the facts are "undisputed" and established by the State-court Record (Browder v. Director, 434 U.S. 257, 98 S. Ct. 556, 1978 U.S. LEXIS 253 at [***LedHR8A] and Footnotes 10), and the Record flatly contradicts State fact findings (United States ex rel Ross v. Franzen and Wolf, 668, F.2d 933, 939 (7th Cir. 1982)), as in the instant matter.

47. Supported by the above, the enclosed evidence has been presented back into the Trial Court on numerous occasions. It has also been presented through the appellate process into the U.S. Supreme Court. Mysteriously, no Reviewing Court has ever adjudicated the merits of the evidence with a FINDING OF FACT AND CONCLUSION OF LAW, and the evidence has gone *uncontested* by the prosecution in every legal proceeding. In this light, lack of challenge constitutes concession of the facts.

48. For anyone to declare the presentation of this evidence/claim to be meritless, then the evidence of the crime that occurred in Put-In-Bay, Ottawa County, Ohio, that has been utilized to keep Wood wrongfully imprisoned, is *also* meritless.

AFFIDAVITS

49. Should anyone seek to challenge this Affidavit or its contents, it is universally accepted that a properly constructed and supported affidavit may be considered evidence. Likewise, an affidavit must be controverted by an affidavit. But when that

properly constructed and supported affidavit goes uncontested by another, the statements of the former are “taken as true, since there is no evidence contesting it.” Mauersberger v. Marietta Coal Co., 2014-Ohio-21, *P13. And, “if a case-making fact in the movant’s affidavit is uncontested, then the court can take the fact as true and grant” requested relief. Carter v. Licking Cty. Bd. Of Commrs., 5th Dist. No. 99CA43, 1999 Ohio App. LEXIS 5270, 1999 WL1071709, at *3 (Nov.4, 1999).¹⁰ Mauersberger, Id. In addition, a party against whom relief is sought “may not rest upon the mere allegations or denials of the party’s pleadings, but the party’s **response** by affidavit” [**emphasis added**]. Mauersberger at *P14.

50. This properly constructed and supported Affidavit, the Exhibit(s) attached, and the accompanying **Flash-Drive** that contains the much cited Blueprint for Wrongful Imprisonment, are, by operation of law, deemed one (1) interwoven item pursuant to Civ.R.10(c) Adoption by reference, which states, in pertinent part, that

***. A copy of any written instrument attached to a pleading is part of that pleading for all purposes.

51. With uncontested State’s best and direct evidence from the face of Wood’s materially altered and incomplete Trial Record, I have presented a genuine issue of material fact; and that fact is two-fold:

- i. **Scott Sadowsky** is guilty of the indicted, testified to, and confirmed sexual assault: “rape” of S.L. on October 1st-3rd of 2004 that happened in Put-In-Bay, Ottawa County, Ohio

¹⁰ See also: Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 1986 U.S. LEXIS 38, ****56; Anson v. Tyree, 490 N.E.2d, **596; Zacchini v. Scripps-Howard Broad. Co., 1976 Ohio LEXIS 687, ***29; Archer v. Cachat, 165 Ohio 286, *288; Budreaux v. Mendel, 2000 U.S. App. Lexis 9898, *4.

- a. The Medina County Prosecutor's office declares the rape happened, "Penetration, however slight" (Tp.537, Ln.24-538, Ln.3) {74}, and continues to vehemently uphold this declaration. Therefore, convicting the appropriate perpetrator is in order
 - ii. Wood is legally, factually, geographically, physically and psychologically innocent of the alleged F-1 rape of S.L.
52. As a result of laws, facts and evidence presented, Scott is the one who must defend and refute this Affidavit.
53. With that said, regarding this properly constructed and supported Affidavit, "No more than that is necessary to make the prima facie case." United States v. Kis, 1981 U.S. App. LEXIS 18007, HN9, **28.

PRETRIAL FACTS: Part I

54. Historically, in October of 2003, Wood, a general contractor at that time, arrived at the home of Scott and Danielle in Medina, Ohio to perform warranty repairs around windows installed by another contractor. Shortly after their first meeting, Wood and Danielle began an affair (Tp.84-85). At that time, Scott and Danielle had one (1) biological son: A.S. (Tp.83, Ln.23-25), and one (1) legal guardian daughter: S.L. (Tp.84, Ln.1-7).
55. Around mid-July of 2004 (Tp.86, Ln.20-22; Tp.87, Ln.7-16), Danielle moved in with Wood into his Montville Township, Medina County, Ohio home: a home in which he kept an 'open door policy' as a "rule" (Tp.114, Ln.7-11). A.S. and S.L. moved into Wood's home on an intermittent and part-time basis {131}: "three nights a week" (Tp.114, Ln.25-Tp.115, Ln.5) around mid-August. With Danielle "always around"

- (Tp.120, Ln.18-23), the children resided in Wood's home Tuesday through Thursday, while they resided with Scott every Friday through Monday (Tp.87, Ln.15-22). The results of this schedule confirmed that Wood knew S.L. for a mere 28 intermittent and partial days while allegations for abuse were for "approximately fifty times."¹¹
56. Danielle became aware that she was pregnant during the first few days of September 2004 (Tp.86, Ln.16; Tp.144, Ln.12-13). Approximately two-and-a-half (2 ½) weeks later Wood was falsely accused of a 'vaginal rape' (Tp.537, Ln.9-Tp.538, Ln.3) regarding S.L. The case was then signed in with Dr. Suzanne LeSure¹² ("Dr. LeSure") of Cornerstone Psychological Services in Medina City by Scott and Danielle on September 24, 2004 (Tp.407, Ln.7-16), and *not the police* {43}. As this event happened approximately one (1) week **prior** to the indicted dates of October 1st-3rd of 2004 (Exhibit-C), either someone must be in the possession of clairvoyant capabilities, or fraud and conspiracy have been factually established.
57. In light of the above, as the Reader will note the dates, the mysterious 'signing in' of this case happened while Danielle was sleeping in Wood's bed and she never told him.
58. In direct consideration of the above fact, the Reader will see that there is much more behind Judge Collier declaring Danielle to be "not truthful in her testimony" (Tp.132, Ln.22-25) than he knew {107}. As to *why* he permitted Danielle to continue to present Court-acknowledged and State-utilized perjury to the Court-declared "cynical" Jury (Tp.135, Ln.7-11) remains an *in subsidium* mystery.
59. With two (2) of the oldest *motives for revenge* established: ***Sex & Family***, during

¹¹ A Blueprint for Wrongful Imprisonment: Ch.09, p.47-50, ¶177-¶184.

¹² A Blueprint for Wrongful Imprisonment: Ch.30, p.231-232, ¶724j, 1-6.

Closing Statements, Pros. Eisenhower admitted to the “cynical” Jury,

Well, I’ll give you Scott Sadowsky. He’s got a reason not to like Frank Wood. That much is true. ***. He came up here and he told you exactly what happened. “I hired this guy. I let Danielle do it. I hired him to come in, and the next thing you know **he’s got my wife**” [**emphasis added**], (Tp.496, Ln.7-13).¹³

This was completely contradictory to Scott’s personal testimony (Tp.197, Ln.11-Tp.198, Ln.8). Further, such a statement was merely designed to put the bellows to the flames of an already emotional Jury that was gunning for a conviction.

PRETRIAL FACTS: Part II

60. As the Record reveals, on October 20th of 2004, Danielle, for the first time and alone, and under Scott’s **orders** (Tp.169, Ln.18-Tp.170, Ln.2), went to the Montville Township Police Department and filed a “report” in which she named Wood a “potential perpetrator” and alleged that he did something to S.L. earlier that morning (Tp.163, Ln.12-Tp.164, Ln.21). Eventually the Montville P.D. *refused* to file “rape” charges against Wood, for the first time, finding no merit to the allegation (Tp.66, Ln.3-8). Then, contrary to her actions, Danielle and Wood were intimate a few weeks later (Danielle: Tp.165, Ln.1-9).
61. After months of badgering by Danielle (Tp.94, Ln.1-7), on January 11, 2005, S.L. finally gave in and told Danielle the story Scott wanted her to hear (Tp.94, Ln.8-9). Actively pursuing charges against Wood under Scott’s **orders**, on January 12, 2005 Danielle went to the Montville P.D. for the second time alone (Tp.170, Ln.11-19).
62. Contrary to Danielle’s persistent reporting, Scott admitted he took “no action” (Tp.206 Ln.19-21). Why? It was most certainly not due to excellent parenting skills.

¹³ As Wood was hired by Unmistakably Premier Homes out of Wadsworth, Ohio for the warranty repairs, these statements cannot be found in Scott’s testimony (Tp.179-219).

Further, the Record is VOID of Scott being involved in ANY criminal reporting or case interviews. This is extremely suspect. But, then again, via his own testimony, Scott admitted that he actually *believed* S.L. was being “truthful” when she denied any wrongdoing by Wood (Tp.216, Ln.2-14).¹⁴

63. Later that same day, on January 12, 2005, Tricia Carchedi (“Ms. Carchedi”) of the Medina County Job & Family Services (“MCJFS”) interviewed Danielle and S.L. with Montville P.D.’s Officer Travis McCourt (“Ofc. McCourt”) present (Ms. Carchedi: Tp.338, Ln.6-19; Ofc. McCourt: Tp.51, Ln.4-Tp.53, Ln.1). This interview concerned Danielle’s allegations regarding October 20, 2004. Ofc. McCourt then video-interviewed Wood on February 16, 2005 (Tp.57, Ln.1-11) without the presence of counsel and then searched his home without a warrant: **both of his own volition**.¹⁵ Eventually their office “terminated” (Tp.74, Ln.16-17) the October 20, 2004 rape allegation/case against Wood, and shared their negative findings with MCJFS (Tp.350-351).
64. The Montville P.D. report regarding the investigation and termination of Wood’s case surfaced during Trial (Tp.70, Ln.15-19), confirming “no charges were brought” (Tp.74, Ln.22-23) against Wood concerning the rape allegations for October 20, 2004. Per Ofc. McCourt’s testimony, not only did he refuse to charge Wood **twice** (Danielle’s repeated attempts), his “sergeant” *also* refused to charge Wood (Tp.74, Ln.13-23). Unfortunately, the Trial Court-declared “cynical” Jury (Tp.135, Ln.7-11) did not grasp what was actually happening.

65. During Ofc. McCourt’s testimony, Atty. Green sought to get into the

¹⁴ A guilty conscience will speak.

¹⁵ This video was not shown during Trial because Wood readily agreed to DNA testing.

“inconsistencies” {70} of the report that Ofc. McCourt testified to (Tp.79-80). Pros. Eisenhower immediately objected, fearful that Atty. Green would “impeach” the State’s first witness (Tp.71, Ln.6-19). This is because the report this officer was using during Trial was **NOT** the report he read prior to Trial (Tp.78, Ln.11-18). In response, Judge Collier acted *in subsidium* the State by illegally suppressing {123} this exculpatory evidence from the “cynical” Jury in direct violation of Brady v. Maryland, 373 U.S. 383 (1963) and its progeny (Tp.80, Ln.19-25).¹⁶

October 20th of 2004: Part I

66. As the Reader will note, Montville P.D. and MCJFS investigated allegations specifically for October 20th of 2004 (above) and **NOT** the State-*pinpointed* dates of October 1st-3rd of 2004, or the indicted dates of October 1st-3rd of 2005 (Exhibit-C).
67. The removal of the October 20th allegation from the charging instrument by Pros. Eisenhower was deliberate and therefore remains conclusive.
68. October 20th of 2004 was also investigated by former Detective Mark Kollar (“Det. Kollar”) of the Medina City Police Department. Operating outside of his jurisdiction,¹⁷ his investigations yielded absolutely **nothing**.¹⁸ Also, Det. Kollar never interviewed Wood.

PRETRIAL FACTS: Part III

69. Regarding the alleged October 20, 2004 rape of S.L. in Medina County, Montville’s report was not the only documented results that were illegally suppressed and/or destroyed *in subsidium*. During Trial, in a sidebar without Wood’s knowledge or

¹⁶ A Blueprint for Wrongful Imprisonment: Ch.10, p.57-63, ¶205-¶226.

¹⁷ A Blueprint for Wrongful Imprisonment: Ch.22, p.130-131, ¶424-¶426.

¹⁸ A Blueprint for Wrongful Imprisonment: Ch.25, p.147-172, ¶479-¶551.

presence, a letter surfaced from MCJFS.¹⁹ Evidently this letter was forwarded to the Medina County Prosecutor (Tp.345, Ln.16-18) by Children's Services Social Worker, Ms. Carchedi, in which she declared,

“there was not any evidence to support the allegations of sexual abuse”
(Tp.346, Ln.5-6),

and that their office “closed” the October 20, 2004 rape case against Wood (Tp.339, Ln.11) due to “No evidence” (Tp.342, Ln.6-10) {96, v}. Further, as their office never interviewed Wood (Tp.346, Ln.25-Tp.347, Ln.1), it is simply obvious that they saw no need. However, per Wood, he is still willing to be interviewed with the presence of counsel and remains eager to testify (Exhibit-E).

70. When Atty. Green sought to question Ms. Carchedi because the letter was “inconsistent {65} with what she testified to” (Tp.341, Ln.9-23), through a very confusing and manipulative argument (Tp.341-344), Pros. Eisenhower convinced Judge Collier to not allow the letter to come in.

PRETRIAL FACTS: Part IV

71. On January 26, 2005, S.L. was taken to Akron Children's Hospital (“ACH”) (Tp.262, Ln.17-23) to be medically examined for a ‘vaginal rape’ (Tp.537, Ln.9-Tp.538, Ln.2) that was alleged to have occurred on October 20, 2004 in Medina County. Nurse Practitioner Donna Abbot (“NP Abbott”) performed the exam (Tp.262).
72. Upon taking the stand, NP Abbott confirmed that she found an “intact hymen” with “no abnormalities” or “signs of trauma” (Tp.262-269; Tp.272-278). Then, in clarifying her findings, when Atty. Green directly asked NP Abbott,

Q So, on the physical side, you cannot conclude that sexual abuse had taken

¹⁹ A Blueprint for Wrongful Imprisonment: Ch.10, p.56-57, ¶201-¶204.

place?

she responded with,

A That's correct (Tp.274, Ln.16-18).

73. At the close of Trial, the State submitted "medical reports" from ACH as "Exhibit-4" (Tp.458, Ln.3-5). Out of those reports, I have presented ACH's Suspected Child Abuse Physical Examination Data page as (Exhibit-F). The purpose behind the submission of this document is that it proves the purity of S.L.'s prepubertal hymen²⁰ and Wood's medical innocence.

74. In light of the above, with three (3) State-investigative agencies exonerating Wood of the alleged Medina County October 20, 2004 rape allegation, the State still holds fast that a rape occurred "however slight" {51, i, a} on October 1st-3rd of 2004.

PRETRIAL FACTS: Part V

75. In the dark shadow of above, while probing S.L.'s mind with Wood as theory of perp for an October 20, 2004 rape that allegedly occurred as some unknown location inside of Medina County, Dr. LeSure confirmed her "initial diagnosis" of S.L. was "adjustment disorder" (Tp.414, Ln.13-14). And, to no surprise, S.L. testified she had no idea as to who actually assaulted her and could **NOT** identify Wood as the perpetrator (Tp.244, Ln.2-17). S.L. further testified that she was **NOT** afraid of Wood²¹ (Tp.246, Ln.21-22).

76. Supporting S.L.'s testimony, Dr. LeSure confirmed that S.L. was suffering from "intrusive memories" regarding her past (Tp.423, Ln.22-25); a past from **prior to**

²⁰ A Blueprint for Wrongful Imprisonment: Ch.47, p.454-464, ¶1353-¶1378, 1-4.

²¹ A Blueprint for Wrongful Imprisonment: Ch.10, p.54, ¶193; Ch.30, p.241-242, ¶742, Fn.162; Ch.30, p.281, ¶857, Fn.184.

meeting Wood.²² Interesting. As to what conjured up, clouded and confused her intrusive memories, when asked who told S.L. that Wood had raped her, MCJFS Social Worker Elizabeth Morstatter ("Ms. Morstatter") answered, "Her mother" (Tp.300, Ln.18-Tp.301, Ln.8).²³

77. Let it be known that when S.L. was asked,

Q Who is your mom?

she answered the Court-declared untruthful

A Danielle Sadowsky (Tp.223, Ln.6-7).

78. For Danielle to tell the prepubertal and pure S.L., "Frankie raped you," is what is commonly known as an **Implanted Memory**. This falls under Title 18 U.S.C.S. § 1512, Tampering with a witness, victim, or informant, §§ (b)(1)(j)(k). Obviously it would have been most wise to check the motives of those who made the bogus allegations because,

The exposure of a witness' motivation in testifying is a proper and important function of the constitutionally protected right of cross-examination. Davis v. Alaska, 415 U.S. 308, HN2.

Truly a valid constitutional right when it comes to the cross-examination of a Court-declared untruthful witness; a witness with personal²⁴ and ulterior motives (Exhibit-G: p.D-2, ¶6). Further, there can be no question that Scott possessed the dual motives of *Revenge for the affair* and the *Covering up of his sins*.²⁵

79. I have also enclosed Wood's Who or what destroyed the Sadowsky marriage?²⁶ as

²² A Blueprint for Wrongful Imprisonment: Ch.30, p.268-269, ¶825-¶827.

²³ A Blueprint for Wrongful Imprisonment: Ch.10, p.53-54, ¶192.

²⁴ A Blueprint for Wrongful Imprisonment: Ch.06, p.29-34, ¶109-¶130, (Exhibit-10).

²⁵ A Blueprint for Wrongful Imprisonment: Ch.18, p.114, ¶372, Fn.88.

²⁶ A Blueprint for Wrongful Imprisonment: (Exhibit-11).

(Exhibit-H). Comprised of critical background information that has been extrapolated from the State-court Record, it is remarkably detailed and informative. This document will help clarify certain matters and answer questions currently forming in the Reader's mind.

PRETRIAL FACTS: Part VI

80. Prior to Trial, Wood voluntarily paid for and submitted to a psychological evaluation with M. Douglas Reed, Ph.D. ("Dr. Reed"): the **Ohio Attorney General's Leading Expert** on the matter (Exhibit-I: p.2, Item 17).²⁷ In the end, Dr. Reed unbiasedly and scientifically concluded that Wood does **NOT** possess the psychological capacities to commit such ignorant and heinous acts (Exhibit-J).²⁸

OTTAWA COUNTY CRIME

Trial Facts: Part I

81. Having presented sufficient law and operative fact to justify this action, I now rely upon them as I present the crux of the matter: the "rape" of S.L. "however slight."
82. The State-pinpoint indicted dates of the alleged F-1 rape of S.L. are October 1st-3rd of 2005 (Exhibit-C). As the year was changed back to "2004" during Trial (Tp.18, Ln.2-12), I will use "October 1st-3rd of 2004" for all purposes of this Affidavit.
83. October 1st-3rd of 2004 fell on a Friday, Saturday and Sunday of that year (Exhibit-K: Calendar of October 2004).²⁹ And, with S.L.'s D.O.B. being 10/03/1994 (Exhibit-C), her tenth birthday fell **ON** the indicted Sunday: October 3rd of that year.
84. Regarding the visitation schedule for A.S. and S.L. after Danielle moved in with

²⁷ A Blueprint for Wrongful Imprisonment: (Exhibit-46).

²⁸ A Blueprint for Wrongful Imprisonment: (Exhibit-34).

²⁹ A Blueprint for Wrongful Imprisonment: (Exhibit-15).

Wood, Danielle testified that S.L. was with Scott “typically” every Friday through Monday (Tp.87, Ln.17-22), and Scott confirmed that S.L. was with him “traditionally on the weekend” (Tp.185, Ln.8-9). This was verified when S.L. testified that she “always got to be with dad on the weekends” in “**Put-In-Bay**” (Tp.250, Ln.21-24), and that she could not ever recall staying at Wood’s house on a weekend (Tp.250, Ln.18-20) [**Emphasis added**].

85. Clarifying who “dad” is, when Pros. Eisenhower asked S.L.,

Q Who is your dad?

S.L. freely answered,

A Scott Sadowsky (Tp.223, Ln.4-5).

86. Filling in the blanks, the following colloquy took place during cross-examination between Atty. Green and S.L.:

Q SREDACTED, Ms. Eisenhower asked you about incidents **before** your birthday in 2004 [**emphasis added**].

A Yes.

Q That was when you turned ten?

A Yeah.

Q You got into double figures.

A Yeah.

Q Did your dad celebrate your birthday with you, too, that year?

A Yeah. We had a big party at his place, not at Frank Wood’s house.

Q Okay. That was **on** the birthday, right? [**emphasis added**].

A Yeah.

Q You were staying with him at that time, weren't you?

A Yeah.

Q And that was your dad's weekend, wasn't it?

A (Witness nodding affirmatively.)

Q And when you got back home after your birthday, you had another little birthday at Frank Wood's house?

A Yes (Tp.246, Ln.25-Tp.247, Ln.19).

87. With the above *uncontradictable* facts in mind, we now know that S.L. spent the entire indicted weekend of abuse with "Scott Sadowsky": "dad" in "Put-In-Bay" celebrating her tenth birthday "**on**" her birthday and "not at Frank Wood's house."

88. Right after the above colloquy, while being asked about Wood's dog (Tp.247, Ln.24-Tp.248, Ln.5), S.L. erupted with

Well, I - - I enjoyed the birthday, and it was fun, but it was the two days before that that really - - he hurt me the two days before (Tp.248, Ln.6-8).

89. Query: Who is "he"? {95}.

90. Although the Medina County Prosecutor's Office would like to pass over this question is silence, as it has in the past, I shall answer it for them.

"the two days before"

91. Clarifying "the two days before" her party, we know that S.L.'s birthday fell **on** Sunday October 3rd of 2004. Testimony confirms S.L. celebrated her tenth birthday "**on**" her birthday. By S.L.'s very testimony, she spent the entire indicted weekend of abuse in "Put-In-Bay" with "dad" and "not at Frank Wood's house." S.L. then testified she had another "little birthday" when she got back to Wood's house in Medina County, which, according to Danielle and Scott, would have been "typically"

and “traditionally” on Monday, October 4th of 2004.

92. Having sifted State’s best and direct evidence from the chaff of Wood’s Trial Record, whether it was “the two days before” Sunday, October 3rd of 2004, or “the two days before” Monday, October 4th of 2004, S.L. was sexually assaulted in Put-In-Bay, Ottawa County, Ohio “on” the indicted and pinpointed dates concerning October 1st-3rd of 2004 while she celebrated her tenth birthday with her legal guardian “dad”: **Scott Michael Sadowsky**, and “not at Frank Wood’s house.”

93. Cementing this truth in place, during Closing Statements, Pros. Eisenhower declared to the “cynical” Jury,

“There’s been no evidence to the contrary. None” (Tp.524, Ln.23-24).

94. Reader, please hold this quote in the forefront of your analytical minds and we will come back to it shortly {105}.
95. Put-In-Bay is a place Wood has never been. In fact, the Trial Record is void of any testimony placing him at the crime scene (Exhibit-A: Tp.1-560) {112, i}. What more, in the most logical manner, due to his affair with and impregnation of Mrs. Sadowsky, it is highly unlikely that Wood was in Put-In-Bay celebrating S.L.’s tenth birthday with Mr. Sadowsky. Ergo,

When ever you eliminate the impossible,
no matter how improbable,
what ever remains must be the truth.

-Arthur Conan Doyle, The Sign of the Four

And, although the “cynical” Jury could not crystallize this truth in their malicious minds, we have undoubtedly answered the question of ‘Who is “he”?’ {89}.

Trial Facts: Part II

96. After the State rested its case, Atty. Green motioned for a Crim.R.29 (Tp.461-464).

Then, specifically regarding S.L. and the alleged F-1 rape, Pros. Eisenhower countered with,

Your Honor, the victim testified that it was several days before her birthday, which is [bullshit]. The amended Bill of Particulars says 1st through 3rd [what was REDACTED and emphasis added] (Tp.463, Ln.5-8).³⁰

As it is illegal to REDACT anything a prosecutor says from a State-court Record, Pros. Eisenhower just declared S.L.'s testimony to be "bullshit" because it

- i. Matched the dates in the BOP
- ii. Explains why S.L., the alleged victim, was the **only** State witness to testify to the State-pinpointed dates of October 1st through 3rd
- iii. Proves S.L. did not tell Dr. LeSure everything
- iv. Sheds light on why Montville P.D.'s report and the letter from MCJFS were illegally suppressed
- v. Explains why the October 20, 2004 F-1 rape allegation was "closed" and "terminated" due to "No evidence">{69}
- vi. Confirms why October 20th was deliberately removed from the charging instrument
- vii. Verifies that the "intrusive memories" of "the two days before" proves S.L. was **not** with Wood on the indicted dates of October 1st-3rd of 2004³¹

Trial Facts: Part III

97. At the close of the Defendant's Case, Atty. Green sought to introduce a few exhibits on Wood's behalf (Tp.485, Ln.8-15) and the "cynical" Jury was removed (ibid). One (1) potential Exhibit was a calendar of October 2004 (Exhibit-K of this Affidavit),

³⁰ A Blueprint for Wrongful Imprisonment: Ch.34, p.310-311, ¶946-¶949.

³¹ A Blueprint for Wrongful Imprisonment: Ch.37, p.367, ¶1109, 5.

(Tp.485, Ln.16-18). Atty. Green then, regarding S.L., sought to remind the Trial Court of the indicted, testified to, confirmed and pinpointed dates of “rape” as “October 1st, 2nd, and 3rd of 2004” (Tp.486, Ln.5-8). To this, Pros. Eisenhower objected (Tp.486, Ln.12-17) and then clarified her objection with

Well, only because I believe the issue he is trying to get at is that she may or may not have been in the presence of the Defendant during those days, and there’s absolutely no evidence to hold that theory up. I don’t think there’s anything to support that (Tp.486, Ln.18-24).³²

98. In the end, and to no surprise, Judge Collier acted *in subsidium* and decided “The calendar will not come in” (Tp.487, Ln.1).

99. Query: How was the calendar made part of the Record post-trial?

Trial Facts: Part IV

Closing Statements

100. After declaring S.L.’s uncontradictable testimony to be “**bullshit**,” Pros. Eisenhower donned the *Halo of Hypocrisy* and told the “cynical” Jury,

Look, SREDACTED was very clear. “Right before my tenth birthday.” Who doesn’t remember their tenth birthday? They’re nine and then they’re ten. “Right before” (Tp.495, Ln.15-19).

101. Pros. Eisenhower then continued her malfeasance and displayed her knowledge of the truth with,

And when he [Atty. Green] tried to ask her about that [Wood’s dog and not her tenth birthday party], she said, “No, but the two days before that I hurt” [Emphasis added] (Tp.495, Ln.20-21) {114}.

102. Still not satisfied with her deceptions, Pros. Eisenhower then pushed the *Envelope of Alibi* for Wood with

³² A Blueprint for Wrongful Imprisonment: Ch. 34, p.333-343, ¶1015-¶1043.

What do they remember? The last time it happened, and SREDACTED told you October 20th. The first time it happened is the time it hurt the most (Tp.495, Ln.23-Tp.496, Ln.1).

Pros. Eisenhower just declared the State-pinpointed and indicted dates of October 1st-3rd of 2004 to be the “first time” it happened: when “it hurt” (Tp.248, Ln.6-8). This testimony was supported where Pros. Eisenhower asked S.L., “Now, do you remember a time when it happened right before your birthday?” (Tp.230, Ln.4-5) and S.L. answered, “Yes” (Ln.6), and declared that is when “it really hurt” (Ln.12-13) “In my private” (Ln.16). It is now time to explain the **significance** of October 20th of 2004.

October 20th of 2004: Part II

103. It was on the “closed” and “terminated” date of October 20th of 2004: the day Danielle went to the Montville P.D. to file “rape” charges against Wood (Tp.66, Ln.3-8), that she and the children moved back in with Scott (Danielle: Tp.91, Ln.14-20; Scott: Tp.205, Ln.10-Tp.206, Ln.6). This placed S.L. with Scott on **both** dates in question: October 1st-3rd *and* October 20th of 2004. What more, after deliberately narrowing down the dates to October 1st-3rd, thereby **removing** October 20th from the charging instrument and releasing Wood of all culpability, Pros. Eisenhower informed Judge Collier there were “No supplemental indictments” (Tp.17, Ln.16-17). And, as previously stated, there was **no indicted criminal course of conduct** tying Wood to either Medina County or Ottawa County regarding the alleged F-1 rape of S.L. {39}.
104. As “No supplemental indictments” confirms no additional indicted charges regarding Wood, this renders Scott to be the sole perpetrator {23}.

105. Confirming the above, and violating every ethical and legal standard that governs a prosecutor's function, Pros. Eisenhower remained quite adamant and followed her previous statement with,

She sat here and told you "a couple of days before my tenth birthday." And that's evidence. That's evidence. There's been no evidence to the contrary. None (Tp.524, Ln.19-24) {94}.

No greater **truth** need be spoken.

106. What truly *shocks the conscience* about her declaration is that Pros. Eisenhower just admitted

- i. S.L. was sexually assaulted in her "private" "the two days before" her tenth birthday party in Put-In-Bay, Ottawa County while she was with her "dad": Scott, and "not at Frank Wood's house" in Medina County
 - ii. She was sending an **Innocent Man** to prison to cover-up her screw-up
- Unfortunately, Pros Eisenhower chose a *win over justice* in violation of Berger v. United States, 1935 LEXIS 308, HN5.

Trial Facts: Part V

Jury Instructions: Part I

107. Pros. Eisenhower's actions were not the end of the highly unethical actions of Court and State. During Jury Instructions, Judge Collier told *his* "cynical" Jury,

"What is evidence? *** any facts that *I require* – this Court *requires* – you to accept as true [*Emphasis added*] (Tp.530, Ln.19-23).

Such instructions were given knowing that Wood did not testify despite his repeated demands upon Atty. Green to do so {30}. Further, as Atty. Green elected not to subpoena a single witness of Wood's behalf, despite his hand-written list,³³ Wood had

³³ A Blueprint for Wrongful Imprisonment: Ch.26, p.173-175, ¶552-¶567.

to argue with Atty. Green to call Dr. Reed: the **Ohio Attorney General's Leading Expert** on such matters (Exhibit-I: p.2, Item 17). Upon hearing *voir dire* what Dr. Reed had to say concerning the mind and beliefs of Wood: **he is psychologically prohibited from harming a child** (Exhibit-J), Judge Collier declared that his conclusions "aren't relevant" (Tp.483, Ln.5-9).³⁴ In short, the Court-declared "cynical" Jury never heard any evidence on Wood's behalf. To the contrary, the Jury heard ample alleged evidence that Judge Collier told them to "accept as true," i.e., the Court-acknowledged and State-utilized perjury of the **untruthful** Danielle (Tp.132, Ln.22-25) {58}.

108. Having acted *in subsidium* for the 16th time,³⁵ Judge Collier just bolstered the State's case in violation of U.S.A. v. Francis and Francis, 1999 U.S. App. LEXIS 2874, HN2 by alleging *he* knows things from outside the Trial Record that would prove what they heard to be "true." In addition, he simultaneously vouched for the credulity of the Court-declared untruthful Danielle, and for anything and everything Pros. Eisenhower presented during Closing Statements.³⁶ Such is a blatant violation of Francis at HN4.

109. Reader, the above actions have a root cause in three (3) previous and unmentioned events:

- i. The "million cash" bounty that was placed on Wood's head by Scott³⁷
(Exhibit-G: p.D-2, ¶6-D3)
- ii. The blatant violation of Wood's speedy trial rights and

³⁴ A Blueprint for Wrongful Imprisonment: Ch.34, p.327-333, ¶988-¶1014, 1-2.

³⁵ A Blueprint for Wrongful Imprisonment: Ch.37, p.361-372, ¶1094-¶1115, 1-2.

³⁶ A Blueprint for Wrongful Imprisonment: Ch.35, p.344, ¶1044 through Ch.36. p.360, ¶1093.

³⁷ A Blueprint for Wrongful Imprisonment: Ch.18, p.113-114, ¶365-¶371.

iii. The accompanying fraudulent revoking of Wood's \$200,000.00 cash bond³⁸
Researching these elements will further reveal Wood's justified lack of trust in Atty.
Green.³⁹

Jury Instructions: Part II

110. Before handing the case over to the "cynical" Jury for a pre-determined verdict,
closing on the alleged F-1 rape of S.L., Judge Collier concluded with,
"I'm going to include a request for special findings⁴⁰ from you" (Tp.539,
Ln.22-23),

that was **not** part of the charging instrument,

"and that has to do with the age of S.L. This special finding reads as follows –
you'll see this attached to the verdict form – it says, "We the Jury in this case
duly impaneled and sworn and affirmed" (Tp.539, Ln.22-Tp.540, Ln.2),

It is legally and factually impossible for a Court-declared "cynical" Jury with a Court-
elected Juror who was "molested" in her youth and a Medina City elementary school
teacher,⁴¹ in a child-sex-case, to be "duly impaneled" according to law.⁴²

"further find that the victim was or was not less than ten years of age at the
time of the commission of the offense of rape against her" (Tp.540, Ln.2-5).

Such instructions illegally allowed for the Jury to determine if S.L. was raped
"however slight" on October 1st-3rd of 2004 or October 20th of 2004. This is **key** to
what follows.

Verdict

111. On May 6, 2006, the tainted and tampered with "cynical" Jury submitted its vicious

³⁸ A Blueprint for Wrongful Imprisonment: Ch.18, p.113-121, ¶364-¶394.

³⁹ A Blueprint for Wrongful Imprisonment: Ch.41, p.391-396, ¶1167-¶1178.

⁴⁰ A Blueprint for Wrongful Imprisonment: Ch.37, p.371-372, ¶1114-¶1115.

⁴¹ A Blueprint for Wrongful Imprisonment: Ch.30, p.238, ¶731-¶732.

⁴² A Blueprint for Wrongful Imprisonment: Ch.29, p.192-199, ¶596-¶611.

verdict. Utilizing Judge Collier's "special findings," the Jury found that S.L. was

"a child less than ten in the manner and form as he stands charged in the indictment" (Tp.556, Ln.19-21).⁴³

As the Reader can see, the Jury *believed* S.L. was sexually assaulted on the State-pinpointed dates of October 1st-3rd of 2004 as "charged in the indictment," but utilized illegally admitted and solicited testimony solely from the "closed" and "terminated" date of October 20th, due to "No evidence," to convict Wood. What more, this verdict *agrees* that S.L. was raped "however slight" "the two days before" her tenth birthday party while she was in Put-In-Bay, Ottawa County, Ohio with "dad": legal guardian Scott Michael Sadowsky, and "not at Frank Wood's house" in Medina County, Ohio.

112. Supporting the above,

- i. Again, the Trial Record is void of any testimony alleging that Wood committed a crime on October 1st-3rd of 2004 {95}
- ii. Via testimony, no one placed Wood in Put-In-Bay on October 1st-3rd of 2004
- iii. All testimony against Wood regarding the F-1 rape was for the removed, "closed" and "terminated" allegation of October 20th of 2004 (Opening Statements: Tp.34; Ofc. McCourt: Tp.57-58; Danielle: Tp.88-105, 114; Scott: Tp.187-188; S.L.: 224-231)

113. With testimony and verdict agreeing to "however slight," this is solidified by S.L.'s voluntary in-court testimony, which was as follows:

Well, I - - I enjoyed the birthday [*party "on" Sunday, October 3rd*], and it was fun [*in "Put-In-Bay" and "not at Frank Wood's house"*], but it was the two days before [*on Friday, October 1st*] that that really - - he [*my "dad"*] hurt

⁴³ A Blueprint for Wrongful Imprisonment: Ch.38, p.375, ¶1124-¶1126; Ch.44, p.419, ¶1250-¶1252.

[raped] me ["however slight"] ["in my private"] the two days before [on Friday, October 1st of 2004] (Tp.248, Ln.6-8)⁴⁴ [Emphasis added].

114. Confirming the above and what Pros. Eisenhower knew: where S.L. was, whom she was with, and when it happened, when she directly asked S.L.,

Q Okay. And that incident that occurred a couple of days before your tenth birthday, did he put his private inside your private?

S.L. freely answered,

A Yes (Tp.232, Ln.18-21), ⁴⁵ [Emphasis added] {101}.

115. "Penetration, however slight" (Tp.537, Ln.9-Tp.538, Ln.3) has been legally and factually established with State's best and direct evidence from the face of the Trial Record. Therefore, under law, Scott raped S.L. on October 1st-3rd of 2004 in Put-In-Bay, Ottawa County, Ohio.

116. An indictment and warrant must issue for the rape of the prepubertal child S.L. against Scott Michael Sadowsky.

117. *The Law is the Law.*

PROSECUTION BY INFORMATION

118. The U.S. 5th Amendment confirms that

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment [of information] or indictment of a Grand Jury [emphasis added], ***.

119. The enclosed Transcript of Proceedings (Exhibit-A) in itself is enough to prosecute by presentment of information under the U.S. 5th Amendment. So says the *Lex Terrae*.

⁴⁴ A Blueprint for Wrongful Imprisonment: Ch.44, p.419, ¶1250-¶1252.

⁴⁵ A Blueprint for Wrongful Imprisonment: Ch.34, p.312, ¶956-¶957, 1-2.

120. With the above truths and evidence verified, the Reader of this Affidavit may seek out additional information pertaining to this case. Therefore, it is best to apprise that
- i. In May of 2017, at Wood's request, I went to the Medina County Court of Common Pleas to obtain a MCJFS document from his case file that pertained to the video interview of S.L. This document declared that S.L. was "very nervous due to her father's presence."⁴⁶ The ladies in the vault said the case file was "lost" and cannot be found⁴⁷
 - ii. There are two (2) dockets in Wood's case which verify certain *pro se* filings have been removed, *inter alia*⁴⁸
121. It is highly unlikely that the Reader can/will obtain any assistance from the Medina County Court of Common Pleas, the Medina County Prosecutor's Office, Dr. Suzanne LeSure of Cornerstone Psychological Services, or the Medina City Police Department regarding this case. Too many people have been trying to keep Wood's wrongful conviction quiet for far too long.
122. MCJFS may prove helpful in verifying the closing of this case against Wood due to "No evidence." Also, obtaining a full copy of the reports generated from their office should aid in the investigatory process.
123. As one (1) Montville P.D. report was illegally suppressed {65} during Trial because it explained *why* the F-1 was "terminated" against Wood, others exist.⁴⁹ Obtaining these reports may prove to be quite useful.

⁴⁶ A Blueprint for Wrongful Imprisonment: Ch.10, p.57, ¶204.

⁴⁷ A Blueprint for Wrongful Imprisonment: Ch.20, p.125-126, ¶410-¶412.

⁴⁸ A Blueprint for Wrongful Imprisonment: Ch.45, p.422-437, ¶1257-¶1297, (Exhibits-07 and 26).

⁴⁹ A Blueprint for Wrongful Imprisonment: Ch.10, p.58-59, ¶210, 1-4 -¶213.

NEWSPAPER ARTICLE

124. Post-Sentencing, on May 16, 2006, unbeknownst to Wood or myself, an article⁵⁰ (Exhibit-L) was published in the Medina County Gazette by local reporter Denise Sullivan (“Ms. Sullivan”). Thanks to Wood’s sister and myself, Wood received this article in 2018.⁵¹ As to its importance and impact, Ms. Sullivan quotes Atty. Green as saying,

“Green noted several witnesses testified the rape victim was in the custody of her father the weekend the prosecution alleged the crime took place, making this claim impossible.”

As proven, those “witnesses” were S.L., Scott and Danielle. And, what is truly disturbing about Atty. Green’s statement to the press is that he never clarified to the Jury what he *actually* knew: S.L. was in Put-In-Bay with Scott on October 1st-3rd of 2004 when she was sexually assaulted “the two days before” her tenth birthday party (Closing Statements: Tp.502-522).

125. Why? {30}.

VIDEO INTERVIEW OF S.L.

126. S.L. was video interviewed by MCJFS. Unfortunately, Pros. Eisenhower refused to show the videos of K.S. *and* S.L. during Trial due to “coaching” (Tp.506-507; Tp.507 Ln.15).⁵²

OTHER INCIDENTS BETWEEN Scott and S.L.⁵³

127. The towel incident: S.L. confessed to Wood, in front of Danielle, that Scott dropped

⁵⁰ A Blueprint for Wrongful Imprisonment: Ch.40, p.383-386, ¶1145-¶1154, (Exhibit-32).

⁵¹ I am in possession of the physical article.

⁵² A Blueprint for Wrongful Imprisonment: Ch.11, p.69, ¶245-¶247; Ch.35, p.344-345, ¶1044-¶1046, 1-2, (Exhibit-19: OIP; August 31, 2015: p.2, ¶4-p.3).

⁵³ A Blueprint for Wrongful Imprisonment: Ch.34, p.310-321, ¶946-¶974.

his towel in her bedroom during the weekend of October 8th-11th of 2004 (Exhibit-G: p.D-3, ¶2) {140, xii}. As only four (4) people knew about this: S.L., Scott, Danielle and Wood, for Pros. Eisenhower to ask Scott,

“Did you ever walk around in just a towel? (Tp.218, Ln.22),⁵⁴

was a highly specific question. Especially since this allegation went unindicted. S.L. told someone about this during the investigation. It would help to know whom.

128. Jeans vs. Underwear: Danielle testified that she allegedly saw Wood coming out of S.L.’s bedroom in his “underwear” on the morning of October 20th (Tp.157, Ln.8). To the contrary, S.L. testified that she always saw Wood wearing “Jeans” in the morning and that Scott walked around in his “underwear” (Tp.249, Ln.6-21). And, to no surprise, Scott testified that, during his marriage to Danielle, it was “typically” his habit to walk around the house in “my underwear, my boxers” (Tp.218, Ln.17-21), (Exhibit-G: p.D-3, ¶2-¶3).⁵⁵

129. Computer pornography: During invest, allegations were made regarding Wood allegedly showing S.L. pictures on a computer. Such went unindicted while facts point to the computer of Scott Michael Sadowsky.⁵⁶ This is yet another

Implanted/Transplanted Memory.

130. Facebook transmission: S.L. posted on Facebook that she was abused by Wood two (2) years prior to her moving into his house on an intermittent and part-time basis: when she was eight (8).⁵⁷ Living with Scott since 1999 (Tp.106, Ln.4-5), this is

⁵⁴ A Blueprint for Wrongful Imprisonment: Ch.34, p.314-315, ¶959-¶963.

⁵⁵ A Blueprint for Wrongful Imprisonment: Ch.34, p.315-316, ¶963-¶965.

⁵⁶ A Blueprint for Wrongful Imprisonment: Ch.10, p.53-54, ¶192, (Exhibit-19: Letter to OIP; August 31, 2015; p.3, ¶2-¶3).

⁵⁷ A Blueprint for Wrongful Imprisonment: Ch.48, p.465-467, ¶1379-¶1386, (Exhibit-81 with internal Exhibit-B).

another **Implanted/Transplanted Memory** that went unindicted.

131. “approximately fifty times”: While being interviewed by ACH’s NP Abbott, new allegations surfaced that S.L. was abused “approximately fifty times” (Tp.280, Ln.21-23) **after** S.L. moved in with Scott on October 20th of 2004 until Trial in April-May of 2005 {140, xiii}. Here, S.L. confirmed this living arrangement with, “Brother lives at mother’s house – I just visit”⁵⁸ {55}.

132. S.L. may be reluctant to assist due to the above and below multiple **Implanted/Transplanted Memories**.

Additional allegation

133. S.L. alleged “penile-anal” penetration to ACH. This allegation went unindicted as it was another **Implanted Memory**.⁵⁹

MEDINA CITY POLICE REPORT

134. The Medina City Police Report⁶⁰ that was generated by former Det. Kollar is void of any evidence concerning S.L., save Montville P.D. telling him there was “insufficient evidence” to prosecute the alleged F-1 and that “(no charges were filed)”.⁶¹ His involvement was purely unwarranted.

135. There was a series of pictures that Det. Kollar deceptively testified to, but that were never shown to the “cynical” Jury. In fact, acting on a request from Wood, in July of 2017, I received a disc from the Medina City P.D. that contains *all* of the pictures from Det. Kollar’s investigation. As these pictures were of Wood’s family and friends: appropriate for public display, there is nothing incriminating. Also, there was

⁵⁸ A Blueprint for Wrongful Imprisonment: Ch.10, p.53, ¶191, (Exhibit-17).

⁵⁹ A Blueprint for Wrongful Imprisonment: Ch.10, p.53, ¶190, (Exhibit-17).

⁶⁰ I am in possession of the entire 29-page police report.

⁶¹ A Blueprint for Wrongful Imprisonment: Ch.11, p.65-66, ¶234, 2-¶235, (Exhibit-04: p.9).

not one (1) single picture of S.L. in Wood's possession.⁶²

Dr. Suzanne LeSure

136. Dr. LeSure testified as S.L.'s treating psychologist and the State's expert witness. She was also paid to testify against Wood through a county contract with MCJFS that was awarded by the Medina County Commissioners in 2004. From there, her initial diagnoses of both alleged victims went from "adjustment disorder" to "sexual abuse" due to the motive of *Money*.⁶³
137. Dr. LeSure also noted that S.L. was "picking" at her skin prior to the alleged assault (Tp.437, Ln.9-11).⁶⁴ Such is a sign of LONG-TERM ABUSE. Perhaps this is why Dr. LeSure never interviewed Wood.
138. Dr. LeSure failed to notice that there were two (2) distinct parenting role reversals between Scott and Danielle *during* the investigation. Parents only do such things when they are hiding something.⁶⁵
139. In addition to the above *role reversals*, Danielle participated directly in S.L.'s interview with ACH, but could not hazard a guess as to when the crime actually occurred.⁶⁶ This is completely contrary to her persistent reporting and raises many questions.
140. In consideration of Dr. LeSure's participation, misguided and misinformed investigation, and financially motivated results, a full review of A Blueprint for Wrongful Imprisonment: Ch.30, p.266-285, ¶724-¶871 is highly recommended. Here

⁶² A Blueprint for Wrongful Imprisonment: Ch.25, p.147-172, ¶479-¶551, Fn.108, (Exhibit-33).

⁶³ A Blueprint for Wrongful Imprisonment: Ch.30, p.226-234, ¶724a-¶724l, (Exhibit-43: p.2 of 8), Fn.156.

⁶⁴ A Blueprint for Wrongful Imprisonment: Ch.30, p.268-269, ¶825-¶827.

⁶⁵ A Blueprint for Wrongful Imprisonment: Ch.30, p.280-281, ¶853-¶858, Fn.184.

⁶⁶ A Blueprint for Wrongful Imprisonment: Ch.47, p.463-464, ¶1378, 1-4, (Exhibit-14).

the Reader will discover that

- i. S.L. had been treated at Cornerstone Psychological Services **prior to** meeting Wood
- ii. S.L. had at least one (1) previously treating psychologist: Dr. Natalie Jedacek
- iii. S.L. was abused by at least two (2) men prior to meeting Wood
- iv. S.L. did **NOT** tell Dr. LeSure everything
- v. S.L. was suffering from a “series of recent stresses” (Tp.414, Ln.17)
- vi. S.L. was removed from her “Grandma Alice’s”⁶⁷ home by Cuyahoga County Children’s Services/Job and Family Services prior to coming into the custody of Scott and Danielle
- vii. Too many unqualified people, and “children,” tampered with S.L.’s mind⁶⁸
- viii. Information was deliberately withheld from Dr. LeSure by Wood’s accusers
- ix. Scott avoided all case reporting and interviews
- x. Like Ms. Carchedi from MCJFS, Dr. LeSure confirmed that S.L.’s “mother” told her that “Frankie” had raped her
- xi. Dr. LeSure’s protocols have been condemned by, at least, two (2) other psychologists
- xii. When Dr. LeSure asked S.L. about “the last time,” S.L. responded with, “Sometime after my birthday and before Halloween” (Tp.416, Ln.15-17). This confirms the “towel” incident that took place the second weekend of October of 2004 {129}. What more, due to the visitation schedule, Wood only knew S.L. for approximately nine (9) intermittent and partial days in October of

⁶⁷ See also: A Blueprint for Wrongful Imprisonment: Ch.29, p.201, ¶622.

⁶⁸ A Blueprint for Wrongful Imprisonment: Ch.29, 206-209, ¶633-¶640, 1-6.

2004. This would have left S.L. in Scott's care the other 22 days

xiii. Keep in mind "approximately fifty times" {131}

141. Lastly, regarding Dr. LeSure's testimony, she declared that S.L. had a "complicated history" (Tp.430, Ln.20) that Pros. Eisenhower did not want her to testify about.

Sexual activities between A.S. and S.L.

142. Prior to S.L. moving into Wood's home, in January of 2004, Danielle found S.L. and her step-brother A.S. behind Danielle's bed. Per Danielle, the children were naked and S.L. was fondling A.S. In a hysterical phone call to Wood, Danielle shouted, "She was molesting my son!" (Exhibit-G: p.D-1, ¶4).⁶⁹

143. A second incident took place in July of 2004 and Danielle called Children's Services in response (Tp.159, Ln.12-Tp.160, Ln.10). As Danielle was living with Wood at that time and the children were not, Danielle never told Wood about this second incident or the phone call.⁷⁰ When this evidence surfaced at Trial, Pros. Eisenhower objected and questionably suppressed this evidence under the Rape Shield Law (Tp.159, Ln.2-Tp.162, Ln.7; Tp.430, Ln.14.-Tp.433, Ln.5).

Victims of Crime Representative

144. On May 9, 2012 at 7:30 a.m., while incarcerated at the Grafton Correctional Institution in Grafton, Ohio, Wood was approached by one (1) of the local Victims of Crime Representatives: Ms. Cynthia Williams ("Ms. Williams"). Through a series of conversations with Ms. Williams, Wood learned that

- i. S.L. was now an "alleged" victim
- ii. Someone changed their story, again


⁶⁹ A Blueprint for Wrongful Imprisonment: Ch.29, p.201, ¶619.

⁷⁰ A Blueprint for Wrongful Imprisonment: Ch.29, p.201, ¶620.

- iii. S.L. wanted to speak with Wood
- iv. A falsified PSI was filed that contained two (2) unindicted allegations that were never testified to


145. Ultimately, in the end, Ms. Williams⁷¹ looked Wood in the eye and said, "I know you're innocent."⁷²

AFFIANT FURTHER SAYETH NAUGHT




Ronald R. Stanley-Affiant

Sworn to or affirmed, and subscribed in my presence on this 5th day of
March, 2020.



Notary Public

 VIRGINIA LEE BOUDINOT
Notary Public State of Ohio
My Comm. Expires October 24, 2020

My Commission expires: Oct 24, 2020.

The Great Seal of the State of Ohio:

⁷¹ An ODRC employee, Ms. Williams may be retired by now, but she clearly knew something of significant value.

⁷² A Blueprint for Wrongful Imprisonment: Ch.46, p.447-451, ¶1328-¶11343, (Exhibit-81 with internal Exhibit-B), (Exhibit-82).