

between Scott and Danielle during the investigation⁴⁶. Ask any federal agent: Parents only do such things when they are hiding something; *things* that explain *why* Danielle left the sanctity of her marriage bed and came to me for affection.

Once is an indicator.
Twice is a pattern.
Three times is confirmation.
Four is commitment⁴⁷.
-Frank P. Wood

Part XIV: "picking"

Dr. LeSure testified that S.L. was "picking" at her skin **prior** to the alleged assault (Tp.437, Ln.9-11). Not only is this a sign of LONG-TERM ABUSE, it's proof she was abused **prior** to meeting me. Perhaps this is why Dr. LeSure never interviewed me.

Part XV: Social Worker Elizabeth Morstatter's Specific Testimony

When asked who told S.L. that I had raped her, Ms. Morstatter answered, "Her mother" (Tp.300-Ln.18-Tp.301, Ln.8).

When S.L. was asked,

Q Who is your mom?

she freely answered,

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

At this juncture, the bogus rape allegation should have been dismissed. Also, with this evidence on the table, Danielle admitted that she repeatedly badgered S.L. for months (Tp.94, Ln.1-7) until she got the story she wanted to hear (Tp.94, Ln.8-9). What more, Scott testified that when S.L. denied any wrongdoing by me, he actually believed she was being "truthful" (Tp.216, Ln.2-14)⁴⁸.

Now that we have seen the truth of the matter, I ask that you take time to consider what actually transpired between Danielle and S.L. For clarity, Danielle told a nine-year-old pre-pubertal child who was, respectfully, a Temple Virgin,

⁴⁶ A Blueprint for Wrongful Imprisonment: Ch.30, p.280-281, ¶853-¶858, Fn.184.

⁴⁷ Tracking human or animal, it's all the same.

⁴⁸ A guilty conscience will speak.

“Frankie raped you.”

By definition and application, that’s *Sick & Twisted*.

31. Do you know of any evidence of your innocence available at trial that WAS not brought out in court?

Six (6) valid Brady violations occurred *during* the Trial process, that I could find. They are as follows:

Part I: Letter from Medina County Job & Family Services

Without my knowledge, a letter surfaced from Medina County Job & Family Services (“MCJ&FS”) to the Medina County Prosecutor’s Office {Item 30, Part V}. The letter stated that the October 20, 2004 F-1 rape case against me was “**closed**” (Tp.399, Ln.11) because

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

Again, the closing and termination of this case was specifically due to “**No evidence**” (Tp.342, Ln.6-10).

After a very confusing and manipulative argument by Pros. Eisenhower, the Trial Court: Judge Collier, illegally suppressed this letter (Tp.341-344)⁴⁹.

Part II: Montville P.D. reports

There were multiple Montville P.D. reports regarding the October 20, 2004 F-1 rape allegation. One (1) of them surfaced at Trial (Tp.70, Ln.17) confirming “**No charges were brought**” (Tp.74, Ln.23), but was suppressed by Court and State because it stated *why* the F-1 rape case was “**terminated**”. Judge Collier, in direct violation of R.C.2301.141 Retention of documents, then gave this report to his Court Reporter “to keep” (Tp.80, Ln.19-25), *knowing* she would **destroy** it.

Part III: Dr. LeSure’s psych report

Per the altered Record, Judge Collier admitted that the State’s expert witness: Dr. LeSure, walked evidence into his office **prior** to Trial, and handed him a “report” *ex parte* and outside of the rules of discovery. He eventually declared the report to have no

⁴⁹ I did not know of this letter’s existence until post-trial, for I was not privy to the sidebar in direct violation of Crim.R.43 Presence of the defendant.

exculpatory value (Tp.6, Ln14-17), and then gave it to his Court Reporter knowing she would **destroy** it⁵⁰. Yes, just like the Montville P.D. report (directly above) that was suppressed because it explained *why* the F-1 rape case was **"terminated"**.

Part IV: Privileged Information I

As noted, with not a little *malfeasance*, Pros. Eisenhower relied on the solicited testimony from the "closed" and "terminated" October 20th allegation to convict on the October 1st-3rd allegation. So, when Pros. Eisenhower asked the alleged rape victim about **"a time that it happened right before your birthday"** (Tp.230, Ln.4-5), it became clear that she was given PRIVILEGED INFORMATION, concerning the INDICTED weekend of abuse, that was not disclosed to the Defense. This is because the alleged rape victim testified

- a. she celebrated her tenth birthday **"on"** her birthday, which was Sunday, October 3rd of 2004 (See Amended Bill of Particulars).
- b. that was the weekend it "hurt" in her "private".
- c. she was in Put-In-Bay with "dad" and "not at Frank Wood's house".
- d. she spent the entire indicted weekend of October 1st-3rd with Scott in Put-In-Bay⁵¹, which fell on a Friday, Saturday and Sunday that year.
- e. it was her "dad's weekend".
- f. it hurt the **"two days before"** her party, which means she was abused on the indicted Friday, October 1st of 2004.
- g. she had another party when she got back to my house on Monday, October 4th of 2004.

NOTE: The alleged victim's second birthday party was actually at my house on Tuesday, October 5th of 2004.

⁵⁰ With the passing of Ohio House Bill 411 in 2017, it does not matter when the violation happened, when it was discovered, or when it was filed. Also, it can be filed at any time, regardless if the claim was previously filed, heard and dismissed on grounds of timing (See HB 411, SECTION 1, Sec. 2743.48 (A)(5)).

⁵¹ Confirmed by the combined testimony of Scott and Danielle.

With the above in mind, whether she was sexually assaulted the “two days before” Sunday, October 3rd, Monday, October 4th, or the “two days before” Tuesday, October 5th, the alleged victim was still in Put-In-Bay with “dad”: Scott Sadowsky, and “not at Frank Wood’s house.”

This also confirms that the alleged rape victim **did not tell Dr. LeSure everything** {Item 32, c, i and iii}. You see, per Dr. LeSure, the sexual assault, according to S.L., happened

“Sometime after my birthday and before Halloween” (Tp.416, Ln.15-17).

Remarkably, repeated sexual assault allegations, “approximately fifty times” (Tp.280, Ln.21-23), did not emerge until **after** S.L. moved back in with Scott on October 20th of 2004 until Trial in April-May of 2006. With that said, please keep in mind that I only knew S.L. for nine (9) intermittent and partial days during that month.

The pre-trial living arrangement was confirmed by S.L. with,

“Brother lives at mother’s house – I just visit⁵².”

Part V: Privileged Information II

Again, Pros. Eisenhower asked Scott if he ever walked around the house in just a “towel”. Only Four (4) people knew about that: S.L., myself, Scott and Danielle. So how did the Prosecutor come by this relevant and PRIVILEGED INFORMATION?

Part VI: Suppression of Dr. Reed’s testimony

Again, Judge Collier refused to let Dr. Reed testify. His testimony spoke directly to the charges in the indictment. For Dr. Reed to confirm that I am psychologically prohibited from harming a child would have swayed the “cynical” Jury, that was gunning for a conviction, in the right direction: NOT GUILTY.

In finality, not only is Dr. Reed the Ohio Attorney General’s Leading Expert on their database⁵³, Dr. Reed is also qualified to do work for the Department of Defense⁵⁴. His credentials were simply too high for Pros. Eisenhower and Judge Collier to contend with.

⁵² A Blueprint for Wrongful Imprisonment: Ch.10, p.53, ¶91, (Exhibit-17).

⁵³ A Blueprint for Wrongful Imprisonment: (Exhibit-46, p.2, Item 17).

⁵⁴ A Blueprint for Wrongful Imprisonment: (Exhibit-46, p.1, Item 5).

32. What evidence was there at trial against you?

NOTE: Before proceeding, I seek to remind you that, as previously mentioned, my case is absolutely **VOID** of DNA, eyewitnesses, or physical evidence of any kind {Item 23, i}⁵⁵.

- i. Pros. Eisenhower and former Detective Mark Kollar ("Det. Kollar") of the Medina City Police Department committed fraud upon the court, thereby deliberately misleading the Jury. A violation of State v. Gilbert, 143 Ohio St. 3d 150, 158 (2004), they commented on illegally obtained and alleged evidence from outside the Trial Record. Then they **refused to show this evidence** (pictures of pictures) to the Jury. Atty. Stanley and I are in possession of these alleged pictures: pictures of **My Family** that are to **my benefit**⁵⁶, {Item 16, iii}.
- ii. The State refused to show the MCJ&FS video interviews of the alleged victims to the "cynical" Jury due to "coaching" (Tp.506-507; Tp.507, Ln.15), (Tp.513, Ln.20-Tp.514, Ln.7).
 - a. It came out *during* Trial that Pros. Eisenhower was illegally present at the MCJFS video interview of the alleged gsi victim, K.S.
 - b. Dr. LeSure received a County Contract in September of 2004 from the Medina County Commissioners to provide "free counseling" to sexually abused children in Medina County. That was **when** she changed her diagnoses of both alleged victims from "adjustment disorder" to "sexual abuse." (F-1: Tp.414, Ln.13-14; F-3: Tp.445, Ln.18-20; Tp.418, Ln.25).
- iii. The RICO Contract⁵⁷, as I refer to it, was granted to cover her "administrative costs"⁵⁸.

⁵⁵ To the contrary, this case is loaded with Implanted/Transplanted Memories, ulterior motives, *in subsidium*, evidentiary suppressions, coaching, vouching, fraud, bolstering, inadmissible hearsay, a RICO Contract, a "cynical" jury, witness tampering and jury tampering. To say the very least.

⁵⁶ In 2017, Atty. Stanley received a copy of the disc that contains the pictures from the Medina City Police Department. I published all pictures relating to children in my book as (Exhibit-33).

⁵⁷ This contract was paid for with tax dollars, went concealed, benefitted others economically, and worked to my detriment. Such violates Title 18 U.S.C.S. §§ 1961, 1962 et seq. and § 1512. I have already begun the legwork to file a Title 42 § 1983 civil action with the RICO Contract and witness tampering as two (2) of my claims. I've been busy. **DURABO!**

⁵⁸ A Blueprint for Wrongful Imprisonment: Ch.30, (Exhibit-43).

Evidently, philanthropy comes at a coveted cost.

- iv. Dr. LeSure never explained the *How* or *Why* she changed both diagnoses.
- v. The primary alleged evidence against me was the *altered diagnoses* of Dr. LeSure. Regarding such:

Alleged F-1

- i. Dr. LeSure said the girl S.L. told her it happened “**sometime after my birthday and before Halloween**” (Tp.415, Ln.15-17). October 20th of 2004, was the same day S.L. moved back in with Scott until Trial. Remarkably, this had NOTHING to do with the indicted dates of October 1st-3rd. Clearly, S.L. did not tell Dr. LeSure everything, again {Item 30, Part IV, Note}.
- ii. Again, the only testimony against me was for the deliberately *removed* date of October 20th {Item 30, Alleged F-1, Part II}. This was the best way for them to confuse the Jury into a conviction.
- iii. Allegations surfaced at Trial claiming that I abused S.L. “approximately 50 times” (Tp.280). As these bogus allegations developed **after** S.L. moved back in with Scott, thereby remaining in his corrupt care until Trial, it is clear that S.L. did not tell Dr. LeSure everything, as directly above and {Item 30, Part IV, Note}. What more, this reveals inconsistencies and **Implanted/Transplanted Memories**. The end results are victim tampering and further accounts of abuse by Scott. These **unindicted** **allegations** deprived me of a legitimate and unbiased decision by the Court-declared “cynical” Jury (Tp.135, Ln.7-11).

With such a contradiction of terms, no, I never stood a chance at Trial.

Alleged F-3:

- i. Despite the fact that the alleged gsi victim K.S. could not recall being at a crime scene with me **TWICE**, Pros. Eisenhower’s questioning directed Dr. LeSure into stating a crime took place.
- ii. After the “**pact**” and a solid **admonishment** {Item 33, Note II}, the following exchange took place between Pros. Eisenhower and K.S.

Q Do you know Dr. LeSure?

A Yes.

Q And have you talked to her about Frank Wood and what he did to you?

A Yes.

Q Did you tell her the **truth** about what that was [**emphasis added**]?

A Hmm-hm, yes (Tp.397, Ln.23-Tp.394, Ln.4).

After this exchange of leading questions, Pros. Eisenhower *vouched* for this solicited testimony when she told the Court-declared “cynical” Jury,

She came back in here and she could tell you the person that she told about this was Dr. LeSure, and she told her the **truth** [**emphasis added**] (Tp.493, Ln.15-17).

Lying and testifying for this coached witness, Pros. Eisenhower continued with,

And she told you who, she pointed at him (indicating), (Tp.493, Ln.18-19).

As the Record is void of such, K.S. actually pointed to the man

“who was married to your mom” (Tp.397, Ln.4-6).

NOTE I: Dr. LeSure testified that both Robyn and K.S. developed the “**same coping mechanisms**” (Tp.422, Ln.13-22). This is what happens when you are sexually abused by the same person in the same home⁵⁹. And she missed it. Completely.

NOTE II: While interviewing K.S. with me as the end in mind, Dr. LeSure concluded that K.S. “didn’t have a lot of symptoms” (Tp.428, Ln.23-24). Something else she missed, *completely*.

NOTE III: Dr. LeSure admitted she did not have a “complete history” of what was going on in the life of K.S. That’s because a complete family history would have included Uncle Ryan.

NOTE IV: Dr. LeSure admitted she did not have the “exact dates” of the alleged crime.

Yes, I was convicted on motivated allegations and guesswork.

33. Witnesses that testified at my Trial

There are three (3) witnesses that we have not discussed in detail. I will discuss them now.

⁵⁹ A Blueprint for Wrongful Imprisonment: Ch.30., p.265, ¶817.

Witness Name and Relationship to Crime: Social Worker Elizabeth Morstatter from Akron Children's Hospital.

Witness for the: State

How do you know this witness?

Only from Trial.

Witness Testimony

She testified regarding the alleged F-1 rape. She claimed the girl told her it hurt in her private. She also claimed that she believed the crime took place, despite the negative medical results, strictly because of what the social worker, Carchedi, had told her. This is contrary to Carchedi sending that letter to the Prosecutor's Office declaring the case was **closed** due to **no evidence**.

Sad. Even the professionals for the State could not keep their stories straight.

NOTE I: In direct support of the above, Robyn testified that

Both gentlemen there at Children's Services and Det. Kollar interviewed myself, KREDACTED, and one of my other children" (Tp.366, Ln.12-14).

Remarkably, these "gentlemen" did NOT testify. Why? Because what they had to say was to my credibility.

Witness Name and Relationship to Crime: Nick Stolph

Witness for the: State

How do you know this witness?

I have known Nick since the 8th grade. We graduated high school together. He was also the foreman for my small construction company.

Witness Testimony

He testified to two (2) things:

1. Claimed I smashed a computer on a public sidewalk downtown Cleveland. Which I did. Also, this laptop had nothing to do with the case.
2. Claimed he and I had such a bad argument in the past that he moved away.

- i. We never had such an argument. Never.
- ii. When I got out on bond and went to see him, he had stolen tools from my company in his garage.
- iii. In the past I caught him, and another employee, not working when their time cards showed different. This happened when we were building First Christian Church in Medina, Ohio.

Witness Name and Relationship to Crime: John Sarya, Bureau of Criminal Investigation

Witness for the: **State**

How do you know this witness?

Only from Trial.

Witness Testimony:

Mr. Sarya testified to two (2) key elements that were to my benefit. They are

1. He investigated the laptop that was confiscated from my home. He found nothing but business files and the like.
2. He had clothing, bedding and a mattress tested for DNA and turned up nothing.

NOTE II: Pros. Eisenhower did more testifying than anyone during opening and closing statements. In fact, she was **admonished** {Item 33, Alleged F-3, ii} by the Court for testifying for the alleged gsi victim with the following:

I'm not going to have you push the girl like this. I mean, it's just not right (Tp.388, Ln.10-16)...I heard what I heard (Tp.389, Ln.10)...we don't have anything (Tp.389, Ln.21... What I'm hearing her say is, "No, it didn't happen" (Tp.390, Ln.4-5)⁶⁰.

What more, she told the Jury several times to "find him guilty" and that they could "feel good" about doing so. In the end, she never had the integrity to declare,

'We are here to find the truth.'

⁶⁰ A Blueprint for Wrongful Imprisonment: Ch.29 p.219-220, ¶684-¶692.

34. Are there ANY witnesses that were available but not called at the time of your trial? Please describe what they would have testified to and what your relationship was with them.

For the State: They did not call in the extended families and friends of the alleged victims, their school teachers or counselors. Nor did they call in S.L.'s prior treating psychologists. I have no idea what they would have testified to.

For the Defense: After my arrest, Pros. Eisenhower went to my character witnesses and told them, "Don't testify for him. Lots of victims are coming forward."

QUERY: Where are they?

Also, former Lead-counsel F. Harrison Green failed to subpoena a single character witness on my behalf. I had to argue with him to call Dr. Reed. What more, as noted below in Item 36, Attorney Green *refused* to let me testify. He kept telling me, "They didn't prove their case."

35. Have ANY witnesses changed their stories since trial? **YES**

How?

Glad you asked.

Pre-Trial Investigation

While out on bond, I hired Tom Pavlish of Empire Investigations out of Cleveland, Ohio, to probe this case carefully. Eventually Tom called and asked to meet. And that we did.

During our highly informative meeting, Tom Said,

"I believe you."

I asked,

"Why?"

Tom answered,

"You're the only one who didn't change your story."

I responded with,

“That’s because when a man tells the truth the first time, he doesn’t have to worry about what he said the second time.”

Atty. Green failed to subpoena Tom Pavlish to testify at Trial.

Why?

Alleged F-3:

Although pre-trial, Attorney Green kept telling me,

“They’re having problems with K.S.”

As this comment is elaborated upon extensively throughout my book, it is obvious that K.S. had problems keeping Uncle Ryan out of her memories while others were trying to force me in them.

Alleged F-1:

Pre-Trial I: S.L. repeatedly denied that I had done anything to her. Eventually, as previously noted, she caved after Danielle admitted to badgering her for months until S.L. gave the story she wanted to hear.

Also, again, allegations of “approximately fifty times” did not surface until S.L. moved back in with Scott and remained under his *corrupt care* until Trial.

Pre-Trial II: Danielle told me that S.L. was sexually abused prior to her and Scott obtaining guardianship. Then, during Trial, Danielle stated that she had no idea what type of abuse S.L. previously suffered (Tp.109, Ln.2-14), only to change her testimony and claim she was told it was not sexual (Ln.17-22).

So, we are to blindly believe the “not truthful in her testimony” Danielle was not told by Children’s Services what type of previous abuse S.L. had suffered? Really? Then how would she know what signs to look for should the child need further counseling?

Post-Trial I: Crime Victim Representative Ms. Cynthia Williams⁶¹ approached me while at Grafton Correctional Institution in Grafton, OH. She said,

“Mr. Wood, the victim in your case – I apologized, Mr. Wood – the *alleged* victim in your case would like to open a dialogue with you.”

⁶¹ I believe she is now retired and Grafton Correctional was her last place of ODRC employment.

Catching the emphasis on the word *alleged*, I replied,

“Which one? There are two.”

The word *alleged* made it clear that **stories** became **uncertainties**.

I later learned that it was S.L. who wanted to speak with me. I agreed to the meeting, but S.L. later declined. I asked Ms. Williams why. She said,

“Because you profess your innocence.”

I then responded with,

“They knew that before they sent you.”

She just gave a knowing smile in response.

Eventually, Ms. Williams told me two (2) key elements:

1. The Presentence Investigative Report declares that I ‘licked’ both vaginas. Revulsed and wanting to spit acid, these allegations were neither indicted nor testified to, rendering the PSI a **fraudulent** government document. Sadly, Judge Collier relied upon this bogus document during sentencing⁶².
2. “I know you’re innocent, and that’s why the Parole Board will never release you.”

Post-Trial II: {Item 37, i}

S.L. posted on *Facebook* that she was abused by me two (2) years prior to her moving into my home on an intermittent and part-time basis: when she was eight (8)⁶³. Living with Scott since 1999 (Tp.106, Ln.4-5), this is another Implanted/Transplanted Memory. This statement holds true because I did not get to know her until just before her tenth birthday.

Two (2) years prior to our meeting?

36. Did you testify at trial? **NO**

If so, what did you testify to? **N/A**

⁶² A Blueprint for Wrongful Imprisonment: Ch.46, p.447-449, ¶1328-¶1343.

⁶³ A Blueprint for Wrongful Imprisonment: Ch.48, p.465-467, ¶1379-¶1386, (Exhibit-81 with internal Exhibit-B).

If not, why didn't you testify?

Again, Atty. Green kept telling me, "They didn't prove their case." I argued with him repeatedly to place me on the stand. He refused. What more, during Trial, Atty. Stanley came to me at the Sheriff's Dept. and asked, "Where did you get this guy? He won't tell me anything." From that point on, I knew I was screwed.

Post-Sentencing, on May 16, 2006, unbeknownst to me for years, an article⁶⁴ was published in the Medina County Gazette by local reporter Denise Sullivan ("Ms. Sullivan"). Thanks to my sister and Atty. Stanley, I received this article in 2018. As to its impact and importance, Ms. Sullivan quotes Atty. Green as saying,

"Green noted several witness testified the rape victim was in 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 Jury⁶⁵ that 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 and "not at Frank Wood's house."

Back to the all-probing question...*Why?*

NOTE: During Closing Statements, Pros. Eisenhower had no problem telling the Jury that, in regards to **the two days before**,

"There's been no evidence to the contrary. None" (Tp.524, Ln.23-24).
{Item 30, Alleged F-1, Part III}

Perhaps this had something to do with the "**million cash**" bounty that was put on my head by Scott⁶⁶ and the **fraudulent revoking of my \$200,000.00 cash bond**. Not to mention the **RICO Contract** that exists between Dr. LeSure and State.

⁶⁴ A Blueprint for Wrongful Imprisonment: Ch.40, p.383-386, ¶1145-¶1154, (Exhibit-32).

⁶⁵ Closing Statements: Tp.502-522.

⁶⁶ A Blueprint for Wrongful Imprisonment: Ch.18, p.113-114, ¶365-¶371, (Exhibit-09: p.D-2 through p.D-3).

37. Is there ANY NEW evidence that was NOT used at trial that could help demonstrate your innocence? YES!

- i. As noted above in {Item 35, Alleged F-1, Post-Trial II}, S.L. posted on *Facebook* that she was abused by me two (2) years prior to her moving into my home on an intermittent and part-time basis: when she was eight (8). Living with Scott since 1999 (Tp.106, Ln.4-5), this is another Implanted/Transplanted Memory. This statement holds true because I did not get to know her until just before her tenth birthday.
 - a. Although I filed a motion for new trial based on newly discovered evidence, it was denied.
- ii. While incarcerated I received a medical research report regarding adolescent and pre-pubertal hymens⁶⁷. I also received, thanks to Atty. Stanley, the printout of the web sites regarding the Leading Experts in Pediatric Child Abuse Medicine who authored the article. Eventually I learned how the research applied to my case and filed a *pro se* motion for new trial. Court and State deliberately relied on the wrong portion, the *adolescent* portion and not the *pre-pubertal* portion, to deny me relief. The appellate courts did the same.
 - a. The motion for new trial for this evidence was denied, likewise.
 - b. The State fears this research because it frees too many people.

38. If there are any items of PHYSICAL evidence that you believe were not found or tested that could help prove your innocence, please describe those items.

Only my house was investigated. Had they interviewed me prior to arresting me, they would have known to investigate the former Medina City house of Scott and his family summer home in Put-In-Bay. If there was any other evidence to be tested, it's long gone.

Section F: Procedural History

Direct Appeal: Brief of Appellant (Court of Appeals for the Ninth Judicial District)

What was the date filed? September 22, 2006

What was the decision date? June 4, 2007

⁶⁷ A Blueprint for Wrongful Imprisonment: Ch.47, p.454-464, (Exhibit-72: Medical Research Report), (Exhibit-79: Doctors who authored medical research article).

What was the decision? Requested relief denied

Please list in detail what issues were raised.

- i. Ineffective Assistance of Counsel; Conflict of Interest.
- ii. Trial Court failed to inquire into conflict.
- iii. Trial Court abused discretion in failing to inquire into conflict; failure to declare mistrial; failure to let Co-Counsel withdraw from the Trial.
- iv. Trial Court abused discretion in failing to allow Defense Expert Dr. Reed testify.
- v. Insufficiency of the Evidence; Manifest Weight.

Post-conviction Petition: Never filed

What was the date filed? N/A

What was the decision date? N/A

What was the decision? N/A

Please list in detail what issues were raised. N/A

State Habeas Petition: Petition for State Writ of Habeas Corpus Pursuant to R.C. Chapter 2725
due to Lack of Subject Matter Jurisdiction (The Supreme Court of Ohio)

What was the date filed? May 2, 2019

What was the decision date? June 26, 2019

What was the decision? Dismissed sua sponte

- a. Filed as an **Original Action** according to law.
- b. Law allows for this to be filed in the county of current residency (incarceration) or the State Supreme Court. I chose the latter.
- c. The Clerk of the Supreme Court of Ohio **refused** to serve the Ohio Attorney General, according to law.
- d. The Atty. General failed to respond by affidavit, according to law.
- e. The Petition was dismissed, allegedly, "in a manner consistent with law". What law?
- f. There was no hearing and no 'Finding of Fact and Conclusion of Law' to justify the illegal dismissal.
- g. No malicious or frivolous ruling.
- h. I did not pursue this action any further.

Please list in detail what issues were raised.

- i. Lack of Subject Matter Jurisdiction (Alleged F-1)
 - a. Filed because I was indicted in Medina County while testimony placed S.L. and Scott in Ottawa County "on" the indicted dates of abuse.

Federal Habeas Petition: Petition Under 28 USC § 2254 for Writ of Habeas Corpus (Northern District Federal Court of Ohio); Filed *Pro Se*

What was the date filed? 2009

What was the decision date? August 12, 2010

What was the decision? Requested relief denied

Please list in detail what issues were raised.

- i. Ineffective Assistance of Counsel: Counsel failed to object to protect regarding inappropriate comments to the Jury such as
 - a. Pros. Eisenhower told the Jury that I hired Atty. Stanley to "manipulate the system" and "intimidate witnesses".
 - b. My own defense attorneys "believe" me to "be guilty".
- ii. Conflict-Free representation⁶⁸
 - a. Atty. Stanley represented Danielle in the divorce proceedings that were the result of our affair, and the source of motive to set me up.
 - b. Pros. Eisenhower admitted on Record that this case was discussed.
 - c. Judge Collier admitted that "jeopardy attached" to me and that the conflict existed.
 - d. Judge Collier **refused** to let Atty. Stanley step down from the Trial.
- iii. Ineffective Assistance of Counsel on Appeal as of Right
 - a. Attorney Salzgeber failed to raise a valid Crawford Violation against Dr. LeSure on Direct Appeal.
- iv. I was denied a "fair trial" and "due process of law" when Judge Collier refused to let Dr. Reed testify before the Court-declared "cynical" Jury.
 - a. To the contrary, the Trial Court had no problem letting the State's so-called *expert* Dr. LeSure testify.

⁶⁸ Atty. Stanley sat by my side during Trial at my request. I asked him to serve as a buffer between myself and Atty. Green.

- b. I gather Medina County has never heard of *Basic Fairness*.
- v. Evidence was insufficient to prove “vaginal rape” beyond a reasonable doubt, especially since I was in Medina while S.L. and Scott were in Put-In-Bay.
 - a. After NP Abbott testified that she could not conclude the rape occurred, this “vaginal rape” charge should have been dismissed.

Federal Habeas Petition: Petition Under 28 USC § 2254 for Writ of Habeas Corpus (U.S.

District Court for the Sixth Circuit Court of Appeals); Filed *Pro Se*

What was the date filed? April 23, 2012

What was the decision date? January 1, 2016

What was the decision? Requested relief denied

Please list in detail what issues were raised.

- i. Ineffective Assistance of Counsel: Counsel failed to object to protect regarding inappropriate comments to the Jury such as
 - a. Pros. Eisenhower told the Jury that I hired Atty. Stanley to “manipulate the system” and “intimidate witnesses”.
 - b. My own defense attorneys “believe” me to “be guilty”.
- ii. Conflict-Free representation
 - a. Atty. Stanley represented Danielle in the divorce proceedings that were the result of our affair, and the source of motive to set me up.
 - b. Pros. Eisenhower admitted on Record that this case was discussed.
 - c. Judge Collier admitted that “jeopardy attached” to me and that the conflict existed.
 - d. Judge Collier **refused** to let Atty. Stanley step down from the Trial.
- iii. Ineffective Assistance of Counsel on Appeal as of Right
 - a. Atty. Salzgeber failed to raise a valid Crawford Violation against Dr. LeSure on Direct Appeal.
- iv. I was denied a “fair trial” and “due process of law” when Judge Collier refused to let Dr. Reed testify before the Court-declared “cynical” Jury.
 - a. To the contrary, the Trial Court had no problem letting the State’s so-called *expert* Dr. Lesure testify.
 - b. I gather Medina County has never heard of *Basic Fairness*.

- v. Evidence was insufficient to prove "vaginal rape" beyond a reasonable doubt, especially since I was in Medina while S.L. and Scott were in Put-In-Bay⁶⁹.
- a. After NP Abbott testified that she could not conclude the rape occurred, this "vaginal rape" charge should have been dismissed.

Petition for Clemency or Pardon

Have you ever filed a petition for executive clemency? **YES**

What was the date filed? October 30, 2018

The Clemency Application was denied on: April 13, 2020

- i. In the denial I was advised that clemency was "not appropriate at this time". Then when can this Innocent Man go home?

Counsel: Please list all attorneys who have represented you.

Current Counsel Name: Ronald R. Stanley (acting *pro bono* since arrest)⁷⁰

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Medina, Ohio 44258

Office: 330-952-1415

Fax: 330-952-1416

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Web: rstanelylaw.com

Trial Counsel Name: F. Harrison Green (Lead-Counsel)⁷¹

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Phone: 513-769-0840

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Trial counsel Name: Ronald R. Stanley (Co-Counsel)

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Medina, Ohio 44258

Office: 330-952-1415

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Email: Legal50@aol.com

Web: rstanelylaw.com

⁶⁹ And S.L. was, at the time of Trial, respectfully, a **Temple Virgin**.

⁷⁰ Atty. Stanley has agreed to step aside and/or assist any firm, group, or organization that retains the necessary resources and power to push this forward.

⁷¹ Someone I do NOT trust.

Appellate Counsel Name: Joseph F. Salzgeber, Jr.⁷²

Contact info (if available): P.O. Box 799
Brunswick, Ohio 44212

Phone: 330-220-7390

Appellate Counsel Name: Kenneth R. Spiert⁷³

Contact info (if available): Ohio Public Defender
250 E. Broad St., Ste. 1400
Columbus, Ohio 43215

Phone: 614-466-5394

Post-Conviction Counsel Name: N/A

Contact info (if available): N/A

Post-conviction Counsel Name: N/A

Contact info (if available): N/A

ADDITIONAL SPACE

Please include the question of any number you are responding to.

I will provide below some additional insights that prove the Medina Court's pre-trial and post-trial objectives are to *Obtain & Sustain* wrongful convictions.

- i. I did file a 26(B) Application to Reopen⁷⁴ into the Ninth Appellate District. However, due to the fact that I solidified the Put-In-Bay crime scene with State's Evidence, the Prosecutor never filed a Brief of Appellee in opposition. The Appellate Court then assumed the dual-role of Prosecutor and Reviewing Court, and filed a lengthy ruling denying me any and all requested relief.
- ii. The combining of these two (2) unrelated bogus allegations in the same charging instrument and Trial resulted in Prejudicial Joinder.

⁷² A former Medina County Prosecutor who quoted a *missing* section of my Transcripts on Direct Appeal. Yes, Atty. Salzgeber was directly involved in transcript manipulation. (See: A Blueprint for Wrongful Imprisonment: Ch.42, p.397-404, ¶1179-¶1214, (Exhibit-63).

⁷³ Atty. Spiert contacted me in prison and stated, over the phone, that he wanted to take my Direct Appeal to the Supreme Court of Ohio. I agreed. He also guaranteed me that he would take this the Federal Court via Habeas Corpus. After I filed proof of innocence in my 26(B), he bailed on me and refused to return a copy of my Transcripts.

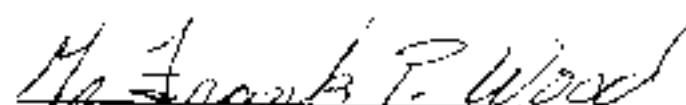
⁷⁴ A Blueprint for Wrongful Imprisonment: Ch.45, p.428-429, ¶1273-¶1277.

- iii. In time, due to my appearance in another case against Medina County for Transcript Manipulation, Judge Collier recused⁷⁵.
- iv. To ensure that Atty. Green had no active involvement in my case post-trial, I eventually filed a Notice of Dismissal of Counsel of Record⁷⁶. The document was held for over a week. State and Court had an illegally evidentiary hearing without my presence or the presence of counsel. The State mysteriously filed its brief in opposition a few hours after my motion was time-stamped.
- v. All post-trial motions were denied with the exception for one (1) motion to expand page limit. Naturally, they wanted to see what I had.
- vi. While out on bond, Att. Green called and asked if I knew this case was closed twice. I said that I did know. He then asked, "Who had enough money to reopen your case?" I made the mistake of telling him. Eventually my bond was fraudulently revoked and my *Speedy Trial Rights*⁷⁷ were violated.

"Cui bono?"

-Cicero

Indeed, *who benefits* from my Wrongful Conviction?


Mr. Frank P. Wood, **Unbroken!**

⁷⁵ A Blueprint for Wrongful Imprisonment: Ch.42, p.399, ¶1192-¶1194.

⁷⁶ A Blueprint for Wrongful Imprisonment: Ch.46, p.438-453.

⁷⁷ A Blueprint for Wrongful Imprisonment: Ch.18, p.113-121.