

AFFIDAVIT OF FREDERICK W. CAMERON III

STATE OF OHIO
COUNTY OF STARK

I, Frederick W. Cameron III, have personal knowledge of the following information, and depose and state under oath as follows:

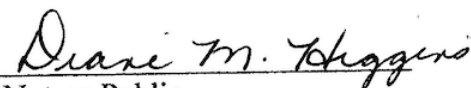
1. I am the grandfather of three of Yvonne Layne's children. I spent a great deal of time with Yvonne and the children during the last year of her life.
2. Yvonne confided in me that she was fearful of her father, Sherman Layne.
3. Yvonne told me that her father just hung around all the time. That it drove her crazy that he'd sit and drink beer and watch television.
4. In December of 1998, at Yvonne's request, I installed a slide bolt lock on the outside of the second floor bedroom door, in which two of the boys slept. It was installed to keep her young son Brandon, from roaming through the house. Only someone with intimate knowledge of her home would know that lock was there, due to the position it was in. She stopped using the lock prior to her death, because she had installed a lock on the inside of the same door, that the older boy could reach instead. The lock on the outside of the door was found locked when her body was discovered.
5. It was clear to me that Sherman resented anyone, including me, being at the house with Yvonne when he would come to see her. His resentment was also apparent at the funeral home, where I was barred from the services, and at the courthouse, where he threatened my life for staring at his wife. This threat was made and witnessed by Detectives Leech and Mucklo.
6. Yvonne asked for my help in setting up video equipment in her home, with which she wanted to videotape her father, Sherman Layne. She said he was performing lewd acts in front of her children.
7. I supplied Yvonne with a video camera, and two videotapes. I put the camera on top of her refrigerator, pointing into the second floor living area, and instructed her to leave it there without turning it on, until her father got used to seeing it there. Then, she was to turn it on, and record what was happening while he was alone with the children.

8. I set the camera up for her approximately four weeks before her death.
9. I went to Yvonne's house one evening, to bring her supplies for the kids, and found her father already there, sitting in her driveway, having been unable to gain access to the house. He told me he'd been there for over an hour, and was unable to locate Yvonne. Once I had pulled into the driveway, Yvonne came around the side of the house, angry, and told her father that she knew he'd been there, and didn't want him to be. She sent him away, and told me that she didn't like him being there, and that he "should be home with his wife".
10. Upon Yvonne's death, the police department took possession of my video camera and my video tapes that I had supplied Yvonne. I went to the police department and asked to have my camera returned to me. They gave me my camera, but did not return either of my videotapes. When I asked for them, they said that they didn't know anything about them.
11. I was interviewed by detectives after Yvonne's death, on April 5th, 1999. I was asked if I knew anyone who owned a certain vehicle, that was mentioned in the course of their investigation. It was known to me as the vehicle belonging to Sherman Layne.
12. In my opinion, there is more pertaining to Yvonne's death, concerning her father and mother, that has not been disclosed.

Further I sayeth naught.


Frederick W. Cameron III

Sworn and subscribed in my presence this 25 day of October, 2002


Notary Public

DIANE M. HIGGINS
Notary Public, State of Ohio
My commission expires June 15, 2007

