IN THE COURT OF COMMON PLEAS, HAMILTON COUNTY, OHIO CRIMINAL DIVISION

STATE OF OHIO :

Plaintiff, : CASE NO. B 9508578

vs. : JUDGE COOPER

ELWOOD JONES : CAPITAL CASE

Defendant. :

Exhibits to Jones's Proposed Motion for New Trial

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	Ex. A-1	Tierria Suggs email to Elwood Jones (2/12/2016)	
	Ex. A-2	Record request letters to Blue Ash PD (10/29/2014 & 5/8/2017)	
	Ex. A-3	Earl Reed & Linda Reed Divorce Decree (12/16/1996)	
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(2/3/2017)

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Sheila McLaughlin, <i>DNA Tests Fail to Link Prime Suspect to Hotel Slaying</i> , THE CINCINNATI ENQUIRER, (May 5, 1995)					
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Handwritten Interview Notes re: Mary Dodds		

IN THE HAMILTON COUNTY COURT OF COMMON PLEAS HAMILTON COUNTY, OHIO

STATE OF OHIO, : Case No. B 9508578

:

Plaintiff, : Judge Cooper

:

v. :

:

ELWOOD JONES,

:

Defendant. :

AFFIDAVIT OF ERIN BARNHART

Comes now the undersigned who makes the following statement, under oath, and before the undersigned Notary Public who is authorized by law to hear and accept oaths, and based upon her own personal knowledge of the facts averred herein states as follows:

- My name is Erin Gallagher Barnhart. I am an Assistant Federal Public Defender in the Capital Habeas Unit of the Office of the Federal Public Defender for the Southern District of Ohio.
- 2. On January 18, 2013, the United States Court of Appeals for the Sixth Circuit appointed my supervisor at the time, Carol Wright, to represent Elwood Jones in his federal habeas case, *Jones v. Bagley*, No. 10-3339. Ms. Wright assigned me as co-counsel in the case and I entered my appearance on January 22, 2013. I have continually represented Mr. Jones since under this appointment. Support staff in our office, including investigators, paralegals, and law-student externs, have acted at my direction as part of Mr. Jones's legal team as well.

- 3. In February of 2016, Mr. Jones called our office to tell us about an electronic message he had received from the prison's JPay system from a woman identifying herself as Tierria Suggs. He mailed us a printout of that message, which we received on February 19, 2016.
- 4. The message was dated February 12, 2016 and date stamped at 1:58 AM EST. It is attached to this affidavit as Ex. 1. It stated:
 - Hello, Sir my name is Tierria I don't know you but my mom just came into my room with some shocking news, she said that she was in jail with the man's who committed the crime that you're serving time for wife. Her name is Linda Reed, she lived in Blue Ash, she was having a conversation with my mom while in jail and told her that her husband is the one who killed the lady at the hotel and he framed (the guy) I'm guessing you in the case. My mom said she was just watching a T.v channel where people are arrested but is innocent and though of your case. Maybe this could be information you could use to help with your case. I didn't mean to intrude but it touched me hearing about your story I have a little more info if you want you can reply. GOD bless you!
- 5. We immediately began to investigate this information and attempted to contact Tierria Suggs. On a phone conference on February 19, 2016, I instructed Mr. Jones to reply to Ms. Suggs's message with the contact information for his legal team and ask her to please reach out to us.
- 6. Tierria Suggs called me on February 25, 2016. She gave me with her mother's name—

 Delores Suggs—and the address where they lived in Cincinnati, and indicated that her mother would be willing to meet with Mr. Jones's legal team.
- 7. An investigator on Mr. Jones's legal team, Mackenzie Breeding, immediately reached out to schedule an interview with Tierria and Delores Suggs.

- 8. Ms. Breeding met with Tierria and Delores Suggs at their home in Cincinnati on March 4, 2016. Attorney Jay Clark, who represents Mr. Jones in his post-conviction proceedings before this Court, was also present at this interview.
- 9. During the interview, Delores Suggs stated the following:
 - While she was incarcerated at the Hamilton County Justice Center in the mid-1990s, a woman by the name of Linda Reed spoke to her about a murder in Blue Ash, Ohio at the Embassy Suites hotel.
 - Linda told Delores that Linda's husband was the real killer and that the black man who had been locked up had been framed for the murder.
 - Linda told Delores that Linda's husband was friends with the police and often had coffee with them, so he was not worried about getting in trouble for the murder.
 - Linda told Delores she was in jail for menacing. Linda said that her husband was trying to get the deed to the house, and that he wanted her locked up to pressure her to give up the deed.
 - Linda was white, heavy set, short and stubby, and in her 50's or 60's.
 - Linda lived in Blue Ash and told Delores that she lived on Pfeiffer Rd.
 - Delores was released from jail before Linda, but Linda had given Delores her address and phone number. Sometime after her release from jail, Delores called the number given to her by Linda, but hung up when a man answered the phone.
 - Delores never spoke to Linda on the phone. She later called the number again but was not successful in reaching Linda. She thought the number may have been disconnected but was not certain of that fact.
 - After Delores was released, she spoke with a man named James Wilson
 who she knew because he drove a church van and transported her children
 to church on the weekends. Delores shared her concern about her
 conversation with Linda Reed with Mr. Wilson and asked for his advice.
 Mr. Wilson encouraged Delores to contact the police.
 - From Mr. Wilson's home, Delores called 911 and then connected with the Blue Ash Police Department. She spoke with someone at the police department about what Linda Reed had told her. The police replied that evidence had been found on the man who was arrested for the crime and the case was closed.
 - Delores did not reach out to anyone else about what Linda Reed had told her until a few weeks prior, when watching a television show about

wrongful convictions caused her to think about that conversation again. After watching the show, she told her daughter Tierria about her experience and they looked up the case online. They learned that Mr. Jones was on death row for the murder, and they then sent him the February 12, 2016 JPay message quoted above in paragraph 4.

- 10. After that interview of Ms. Suggs, we attempted two primary lines of investigation, to find (1) Linda Reed and (2) James Wilson. For ease of explanation, I have grouped the efforts we made to locate each of these individuals together in the paragraphs that follow.
- 11. We had previously requested "any and all police records" pertaining to Mr. Jones from the Blue Ash Police Department in 2014. The materials we were provided in response contained no reference to Ms. Sugg's report of Earl Reed's confession. We requested additional records from the Blue Ash Police Department in 2017, specifying in particular a request for "all of the police records for any and all cases related to Elwood Jones, specifically including investigatory work product." Blue Ash did not provide any information regarding Ms. Suggs or Earl Reed in response to that request, either. Copies of both of these request letters are attached to this affidavit as Ex. 2.

Linda Reed investigation

- 12. On March 4, 2016, attorney Jay Clark forwarded a decree of divorce he obtained in the matter of *Earl Reed vs. Linda Reed*. It is attached to this affidavit as Ex. 3. The decree was filed on February 7, 1997 in the Hamilton County Recorder's Office and stated that the couple owned property located at 5100 Pfeiffer Road in Cincinnati, Ohio.
- 13. On March 9, 2016, Mr. Clark sent images of two arrest reports he obtained from the Hamilton County Justice Center. They are attached to this affidavit as Ex. 4 and 5. Both reports originated in Blue Ash. One was for an arrest of a 5'3", 220 lb. white woman named Linda Reed on October 28, 1995 for "agg[ravated] menacing." The other was for

- an arrest of a white male named Earl Reed on May 12, 1996 for domestic violence against "Linda J. Reed, a family member."
- 14. Linda and Earl Reed's addresses were listed as 5110 Pfeiffer (or "Pfieffer") Road in Cincinnati on the arrest reports. The dates of birth and social security numbers of Earl and Linda Reed in these arrest reports matched in the identifying information in the divorce decree referenced above in paragraph 12.
- 15. Mr. Clark had also asked for pictures of Linda Reed and Earl Reed, but because they were both arrested in Blue Ash, the Hamilton County Justice Center did not have pictures of either of them.
- 16. On March 11, 2016, Mr. Clark inquired with Lt. Boyatt at the Blue Ash police

 Department about pictures of Linda and Earl Reed. Lt. Boyatt told Mr. Clark that the
 department had transitioned over to an electronic system in 2005 and that he thought the
 older files were stored in the basement. He said he would look through the older files and
 scan and email any pictures he found to him. He never sent any pictures to Mr. Clark,
 however.
- 17. On March 30, 2016, I spoke with Delores Suggs on the telephone. I let her know that we were still attempting to find a photograph of the Linda Reed we located on Pfeiffer Road so we could determine if she was the person Delores remembered speaking to in the jail.
- 18. During that call, Delores and I spoke about the call she made to authorities to report what Linda Reed had told her about the Embassy Suites murder. Delores told me that she first called 911, and that the operator gave her the number for the Blue Ash Police. She said she then hung up and dialed that number, and when her call was answered, asked to speak to the "head person" or "captain" or someone similarly "official." Because she did not

know Elwood Jones's name back then, she said she just referenced the murder at the Blue Ash Embassy Suites hotel to describe the case. She said she told the person she spoke with that Linda Reed had revealed that her husband had killed the woman and framed "the black guy" for it.

- 19. On March 31, 2016, we obtained records from Ancestry.com indicating that both Linda and Earl Reed were deceased, with Linda having died in 2002, and Earl having died in 2011. We were unsuccessful in obtaining pictures from either of their obituaries.
- 20. On May 31, 2016, I called the Hamilton County Clerk's Office to ask why I could not find any case associated with the 1995 arrest record we had obtained for Linda Reed.
 The person I spoke with told me they did not have any more information than what I was able to see from the clerk's website, and suggested I try calling the sheriff with the arrest number.
- 21. I tried calling the Hamilton County Sheriff's Office at 513-946-6300 on May 31, 2016. I waited on hold for 90 minutes with no one answering my call.
- 22. I then called the Felony Warrant Section of Court Services at 513-946-5350 on May 31, 2016. The officer I spoke with looked up the control number listed on Linda Reed's arrest form. He told me his search returned her name, but no record of her ever being housed in the Hamilton County Jail. He said this could be because Blue Ash had a practice in which it "kept control of the warrant," meaning that Linda Reed could have been held in a local Blue Ash jail and had her case heard in something like a local mayor's court. He said this could be true even though a county case number was associated with her arrest. He also told me to contact the jail records department to get jail housing information.

- 23. Mackenzie Breeding spoke with Delores Suggs on June 14, 2016. Ms. Suggs told her she was certain that she has never been housed in the Blue Ash jail.
- 24. We received instructions from the jail records department to fax a request on letterhead for the records related to inmates housed at the Hamilton County jail. On June 14, 2017, I submitted a request to the attention of "Kelly" in Jail Records at the Hamilton County Sheriff's Office for records for Linda Reed from the years 1995 through 2000.
- 25. Later that day, I received an email from Jessica Jones, Administrative Secretary at the Hamilton County Sheriff's Office. A copy of that email is attached to this affidavit as Ex. 6.
- 26. Ms. Jones stated she had received my letter "requesting records for 'REED, LINDA' from 1995 through 2000." She asked if I could provide additional demographic information, such as a date of birth, "so we can send you the records for the correct Linda Reed." (Ex. 6 at 12.)
- 27. That same day, I responded to Ms. Jones and explained that all I knew was that I was looking for a Caucasian woman named Linda Reed, or possibly Reid. Accordingly, I asked if she could provide me with the information about any Linda Reed or Linda Reid who was housed there during those years. (*Id.* at 11-12.)
- 28. In addition, I explained that I was looking for a woman whose stay in the jail overlapped with that of Delores Suggs, and provide Ms. Suggs's date of birth. (*Id.* at 12.)
- 29. On June 15, 2016, Ms. Jones sent me demographic sheets for four times Delores Suggs was housed in the jail. Those documents are attached to this affidavit as Ex. 7. They showed Ms. Suggs was admitted to the jail in August 1999, October 1999, October 2003, and February 2011, but no date in the mid-1990s.

- 30. In that same message, Ms. Jones explained "a search of 'Linda Reed' and 'Linda Reid' reveals no inmate found." She included in her message screenshots from the searches she ran in the Hamilton County Jail Management System (JMS) database that returned no results for either spelling of Linda's name. A copy of that email is attached to this affidavit as Ex. 8.
- 31. Even though the records we had located for Linda Reed appeared to be consistent with the woman Delores Suggs had described to us, because two separate government agencies had told us that woman never was housed in the Hamilton County jail, and because Ms. Suggs was certain that she had never been housed in Blue Ash's jail, we determined that this Linda Reed could not have been the woman who spoke to Ms. Suggs in the jail.
- 32. Accordingly, we turned our investigation to trying to discover the identity of the woman who spoke to Ms. Suggs in the jail. We searched the Hamilton County Clerk of Court's website for people named Linda (or Lynda) but with a different last name, or people with a different first name and a last name of Reed (or Reid). We also searched people's middle name and aliases, and searched for the names of spouses of employees at the Embassy Suites hotel to see if any were married to someone named Linda.
- 33. In addition, we looked for women fitting the description Delores Suggs provided whose names sounded close to "Linda." This included searching for names like Melinda, Belinda, Celinda, Carlina, Selinda, Rosalinda, and a host of other variations on the name Linda.
- 34. On June 16, 2016, I emailed Ms. Jones requesting jail records for (1) a woman named either Linda Clark, Linda Flory, Sue Flory, or Sue Reed (2) Lori Reed, and (3) the jail

- movement records for each of Delores Suggs's stays. A copy of that email is attached to this affidavit as Ex. 9.
- 35. On June 22, 2016, Ms. Jones responded to my request with "three records located in the Jail Management System Database for Linda Clark . . . and four records for Lori Reed," as well as "the housing and movement records requested for Delores Suggs." (Ex. 6 at 11.)
- 36. The records for Linda Clark showed no overlap with Delores Suggs's times in the jail (Linda Clark was admitted in February 2000 and April 2003). Lori Reed's records showed she was admitted on October 10, 2003, which potentially could have overlapped with Delores's incarceration that month. (Lori Reed's other incarcerations, in February 2004, February 2005, and May 2007, did not overlap with Delores's stays.)
- 37. On July 5, 2016, I emailed Ms. Jones to request (1) the housing and movement records for Lori Reed and (2) JMS and housing and movement records for Brenda Reid. (*Id.* at 10.)
- 38. Ms. Jones responded on July 8, 2016, asking for a specific time period for each. (*Id.* at 11.)
- 39. I replied that same day with the time periods of 1999-2003 and 2011, based on the records Ms. Jones had previously sent me of when Ms. Suggs had been housed in the Hamilton County jail. (*Id.*)
- 40. Later that same day, Ms. Jones sent records for Lori Reed and Brenda Reid. (*Id.* at 7-8.).
- 41. The records for Lori Reed did not show she was incarcerated at any time that overlapped with Delores Suggs's time in the jail.

- 42. The records indicated that Brenda Reid was at the jail at the same time as Ms. Suggs, but also indicated she was African American.
- 43. On July 28, 2016, I emailed Jessica Jones requesting records for every Caucasian woman who had been housed in the Hamilton County jail at the same time as Delores Suggs (between 8/17/1999 and 9/6/1999; 10/6/1999 and 10/7/1999; 10/12/2003 and 10/14/2003; and on 2/2/2011). (*Id.* at 6-7.)
- 44. That same day, Ms. Jones responded that she could provide records of every inmate in the jail on those dates, without further narrowing. After further communication, she provided those Housing History Reports on July 29, 2016. (*Id.* at 7.)
- 45. The records from each of the four times Delores Suggs had been incarcerated contained more than 23,000 inmates. We transferred this data to a spreadsheet and sorted out female inmates from that group. We identified more than 2200 female inmates to review.
- 46. Over the following months, we combed these records for inmates who fit the description Ms. Suggs had given us. We eliminated nearly every potential inmate we investigated based on discrepancies with what Ms. Suggs had told us. For example, many inmates we investigated further turned out to be the wrong age or race.
- 47. We identified one inmate as a potential match named Linda Addison. She was a

 Caucasian woman of the right age with light hair, and we found records of a divorce case
 between her and her husband.
- 48. On March 21, 2017, Jessica Ashcraft, an investigator in our office, met with Delores Suggs at her home in Cincinnati and showed her a picture of Linda Addison. Ms. Suggs told her that woman was not the one she had spoken to in the jail. Even after trying to

- imagine the woman in the picture with a different hairstyle or color, Ms. Suggs was certain that this was not the right woman.
- 49. In November 2017, Tané Dorsey joined Elwood Jones's team as in investigator. After she got up to speed on the case and our investigation, I explained to her that we were at a dead end investigating the information Delores Suggs had given us and asked her if she had any ideas for other ways we could pursue that lead.
- 50. On December 27, 2017, Ms. Dorsey emailed Jessica Jones requesting records for the following individuals:
 - Linda Gail Brown, who may have also gone by Linda McDowell, Linda Nasrallah, or possibly some other last name;
 - Linda Jackson, jailed 8/27-8/28/1999;
 - Linda Mackillop, jailed 9/15-9/19/1999;
 - Linda White, jailed 9/9/99;
 - Linda Hendrickson, jailed 8/3/1999 and 7/6/1999;
 - Linda Addison, jailed 9/26-9/30/2003;
 - Linda Curtis, jailed 10/12-10/13/2003;
 - Linda Rodgers, jailed 9/23/2003; and
 - Linda Peterson, jailed 8/10-8/13/1999.
- 51. On January 12, 2018, Ms. Jones provided nine records responsive to Ms. Dorsey's requests. A copy of the correspondence between Ms. Dorsey and Ms. Jones is attached to this affidavit as Ex. 10.
- 52. Ms. Dorsey then searched for and evaluated pictures and demographic information for each woman and checked for marriages and divorces, previous criminal histories, and addresses. She determined that none of these women matched the description of the woman who spoke to Delores Suggs.

- 53. Based on her review of the records and initial investigation, Ms. Dorsey told me that she thought the Linda and Earl Reed we had found initially were worth looking at again because of the number of consistencies between their records and Ms. Suggs's description. I told Ms. Dorsey to pursue further investigation of that Linda Reed in case the jail records erroneously did not include her incarceration.
- 54. On January 31, 2018, Ms. Dorsey found an online family ancestry site by searching for Linda Reed's maiden name, Shemwell. She discovered two pictures containing a woman who matched the physical description Delores Suggs had provided us.
- 55. On February 8, 2018, Ms. Dorsey met with Delores Suggs at her home in Cincinnati and showed her the pictures she had found of Linda Reed. Ms. Suggs told Ms. Dorsey that the woman in the pictures was definitely the woman she spoke to in the jail. Ms. Dorsey also re-confirmed that Ms. Suggs had never been arrested or detailed in Blue Ash, Ohio.
- 56. On February 12, 2018, Ms. Dorsey inquired with the Blue Ash Police Department and was told they had no record of Delores Suggs ever being arrested or incarcerated in Blue Ash.
- 57. On February 28, 2018, investigator Jessica Ashcraft met with James and Jeannette Shemwell at their home in Kentucky. Linda Reed was the sister of James Shemwell. The Shemwells told Ms. Ashcraft that they did not know Earl Reed very well, although they "got bad vibes" from him. They provided the contact information for Debbie Wood, Linda Reed's niece, who took care of her before her death.
- 58. On March 1, 2018, Ms. Ashcraft called and left a message for Debbie Wood.

- Ms. Wood telephoned me on March 2, 2018 and Jessica Ashcraft and I spoke with her until her lunch break ended. She told us about her aunt Linda's relationship with Earl Reed and taking care of Linda at the end of her life, including the following:
 - Linda resided at the West Chester nursing home when Ms. Wood was her legal guardian.
 - Linda had suffered from NPH, or normal pressure hydrocephalus, which means fluid on the brain.
 - Twice, Linda had a shunt placed in her brain to drain the fluid into her stomach, and this measure made a marked improvement in her functioning.
 - However, Linda's doctors told Ms. Wood that they could not do a third procedure because the shunt was damaged and it looked like "someone had been hitting her in the head."
 - Ms. Wood determined that Earl Reed had been coming to the nursing home and hitting Linda.
 - The nursing home told Ms. Wood to tell Earl Reed that he was not allowed to come visit Linda anymore and that if he did, he would be arrested.
 - When Ms. Wood relayed that message to Earl, she was stunned that he did not seem fazed at all. She made sure he understood the import of what she was saying but nevertheless, he did not get upset or even deny the accusation, which she thought it was very strange.
 - Although Ms. Woods never personally witnessed Earl hitting Linda, she and her family heard a lot about such abuse from Linda, and their son Scott also told the family that his parents fought terribly. The police were always getting called to Linda and Earl's house.
 - In addition to Scott, Earl had a son named Terry Reed from a previous relationship with a woman in Akron. Earl had driven Terry's mother to an insane asylum.
 - Despite being a truck driver, Earl always seemed to have and spend a lot of money on big purchases. Yet his son Scott was forced to donate Earl's body to the University of Cincinnati when he died because he could not afford a funeral for him. Scott also lost the house after Earl's death.
 - Ms. Woods and her family did not care for Earl Reed. She considered Earl to be "sneaky" and thought he gave off "bad vibes." Her parents did not trust Earl and the entire family thought "something was not right"

- about him. They would not be surprised to learn he had murdered someone.
- While Ms. Wood did not know if Earl was friends with Blue Ash police officers, she observed "he could befriend anyone" and her father used to say that Earl "could charm the socks off of anyone."
- 60. On March 2, 2018, I emailed a records request to the Blue Ash police department for run sheets for Linda and Earl Reed's house at 5110 Pfeiffer Road.
- 61. On March 5, 2018, Kevin Deye responded to my request. He provided three pages of records on Earl Reed but no records for Linda Reed. He stated:
 - Prior to 2005 is all paper records. The only search we have back then is by people's names and are filed on 5x7 index cards. I looked up both Earl and Linda Reed and could only find our files on Earl (see attached.) Not sure where the card for Linda went since she has history with us. Unfortunately, I do not have any way to look for address history prior to 2005. I did flip through all the cards with a last name of Reed and this was the only one at 5110 Pfeiffer Rd.
 - A copy of my email correspondence with Mr. Deye is attached to this affidavit as Ex. 11.
- 62. A copy of the three pages of index cards records Mr. Deve provided for Earl Reed is attached to this affidavit as Ex. 12. It reflects complaints of domestic violence with Linda Reed as the victim on 05/12/96, 12/17/93, and 11/05/93.
- 63. I attempted to get in contact with the nursing home where Linda resided at the end of her life, but learned on March 6, 2018 from documents on the Ohio Secretary of State's website that West Chester Health Care was no longer in operation.
- 64. On March 13, 2018, I had a follow-up phone call with Ms. Wood. I learned that she had kept all the records associated with her guardianship of Linda Reed until recently, when she finally threw them away in a move. She said she did not believe the nursing home had called the police about Linda's reports of abuse from Earl, but told her that they simply could tell someone not to come back onto the property. We discussed the various facilities outside of the nursing home where Linda might have had procedures or

- treatments. She agreed to sign a release for us to attempt to obtain any records related to Linda Reed. Ms. Wood also told me that the attorney who represented her when she was Linda's guardian was Jonathan Sams.
- 65. On March 13, 2018, I called the office of attorney Jonathan Sams. I spoke with his assistant, Carla, told me she would look to see if they have any records from his representation of Deborah Wood in Linda Reed's guardianship. Carla said their office generally destroys records after five years, but would call me back after checking to see if they have anything.
- 66. On March 13, 2018, I requested records from the West Chester police department related to the address of Linda Reed's nursing home. The next day, Linda from the West Chester police telephoned me and said that the department's computers crashed in 2000 so they only have records after that date. I requested all records from 2000-2002, the year Linda Reed died. I received those records that day and determined they did not contain any information useful to our investigation. A copy of my correspondence with the West Chester police department is attached to this affidavit as Ex. 13.
- 67. On March 15, 2018, Carla, Jonathan Sams's assistant called me back and told me that the files from Linda Reed's case were purged in 2013.
- 68. On March 21, 2018, we requested records from the Grove City Police regarding the Marlane Drive address noted on the Blue Ash police department's index cards for Earl Reed described above in paragraph 61. The next day, on March 22, 2018, Laurie Grener, Records Specialist at the Grove City Division of Police, stated in an email response: "We do not have any records for Earl, Linda or Scott Reed. The address 4029 Marlane Dr is the Travelodge." A copy of that email is attached to this affidavit as Ex. 14.

- 69. On March 27, 2018, Tané Dorsey met with Deborah Wood, who signed a release for us to obtain Linda Reed's records.
- 70. On April 6, 2018, Tané Dorsey telephoned the University of Cincinnati to inquire about bodies donated there. She was told the University keeps the bodies from one to five years and that DNA is not kept on file once the body has been cremated.
- On April 6, 2018, we requested records related to Linda Reed from every area provider who might have treated her: Mercy Anderson hospital, Mercy Clermont Hospital, Mercy Fairfield Hospital, Mercy West Hospital, Mercy Jewish Hospital, and Bethesda North hospital. All entities responded that they had no records for Linda Reed. Copies of the responses from these entities are attached to this affidavit as Ex. 15. Bethesda North Hospital indicated that Linda Reed's last visit was on 11/30/1998, but that the requested records were no longer available because "TriHealth keeps non-maternity records for ten years before they are destroyed." (Ex. 15 at 18.)
- Based on the timing of Linda Reed's treatment for NPH, we knew that she could not have been in the jail with Delores Suggs at any of the four times reflected in the records we had obtained from the Hamilton County Sheriff, which all occurred after she fell ill and was living in nursing homes. Therefore, on July 26, 2018, I emailed Jessica Jones. I noted that she had previously sent records for Delores Suggs showing she was in the JMS four times, with the earliest incarceration from 9/17/1999-9/6/1999. I then asked Ms. Jones "how far back do the JMS records go" and whether it was possible that Ms. Suggs "was incarcerated at the Hamilton County Jail earlier than 1999 but that stay is not captured in the electronic records?" (Ex. 6 at 4.)

- 73. Later that same day, I clarified that I was "trying to figure out how far back the records in [the JMS] system go," explaining that "I was expecting to see a record for Delores Suggs from 1994, 1995, or 1996," asking whether "the reason why there aren't results from those years because the database does not have records back that far?" (*Id.* at 3.)
- 74. Ms. Jones responded to me on that same day, stating that she "searched the JMS database as far back as it would go" and that "[t]here was no database (that I'm aware—and I've been here since 1994) prior to JMS." (*Id.* at 2.)
- 75. That same day, I responded to Ms. Jones again, asking her to find out "when the records in JMS begin," and whether "the database include[s] all the records from 1994 forward," or whether it began sometime after that. (*Id.*)
- 76. Ms. Jones responded that day that she will see what she can find out. (*Id.* at 1.)
- 77. When I had not heard from Ms. Jones by August 1, 2018, I emailed her again asking whether she was able to find out when the records in the JMD system begin. (*Id.*)
- 78. Later that day, Ms. Jones responded, "The individual I was checking with will be out of the office until Thursday. I will get back with you." (*Id.*)
- 79. To date, Ms. Jones has never responded to my question.
- 80. On September 6, 2018, Tané Dorsey and I met with Delores Suggs at her home in Cincinnati. She maintained that she had met Linda Reed the first time she was in the Hamilton County jail, and that the encounter happened sometime in the mid-1990s.
- 81. I explained to Delores Suggs that I had been unable to find any records of her being in jail in the mid-1990s, and showed her materials from the case files I had requested from her convictions in 1999, 2003, and 2011.

- 82. Those materials included journal entry sheets, which indicated a number of capiases had been issued in her cases, as well as tickets issued for various traffic infractions.
- As Delores Suggs reviewed these materials, she recalled that when she was in jail in the mid-1990s and talked with Linda Reed, she had been incarcerated because she had many outstanding warrants and fees or fines. She remembered that she had been able to reduce the amount she owed by roughly \$30 for each day she spent in jail. She also recalled that she stayed in jail for roughly a week, and eventually did not want to stay any longer and asked her boyfriend at the time to pay off the rest of what she owed and get her out. She remembered he did so on a Friday after he got paid.
- 84. On October 3, 2018, Tané Dorsey telephoned the Ohio Historical Society to inquire whether they kept jail records. She was told they do not.
- 85. Also on October 3, 2018, I reached out to Ann Ohmer, a paralegal at the Hamilton County Public Defender's office. Ms. Ohmer has been pen pals with Elwood Jones and has followed his case for many years.
- 86. I asked Ms. Ohmer if she could help me confirm whether Delores Suggs's memory of spending time in the Hamilton Country jail in the mid-1990s as a way to "pay down" outstanding fees or fines was a practice at that time.
- 87. On October 4, 2018, after conferring with some attorneys who had been practicing in Hamilton County back in the 1990s, Ms. Ohmer confirmed that the practice Delores Suggs had described did exist and was discontinued because it was considered to be "debtor's prison."
- 88. Ms. Ohmer also offered to assist me in retrieving records from micro-film or off-site storage if that would help our investigation. I explained to Ms. Ohmer the difficulties we

- were having in regards to jail records in Hamilton County. I further told her that I would appreciate her help if she could think of any other way of trying to get the records we suspected existed of both Delores Suggs and Linda Reed having been housed in the Hamilton County jail at the same time in the mid-1990s.
- 89. On October 5, 2018, Ms. Ohmer emailed me scans of records that a mitigation outreach specialist in her office, Cheryl Horne, had obtained. These records, with a "Run Date" of 10/5/2018, were titled "Microfiched Information by Control Number" and indicated that "REED, LINDA J" had been admitted on 10/28/1995 and released on 11/28/1995, and that "SUGGS, DELORES M" had been admitted on 11/6/1995 and released on 11/17/1995, which in 1995 was a Friday. Those records are attached to this affidavit as Ex. 16.
- 90. To request these records myself, Ms. Ohmer told me to contact the Hamilton County Sheriff's Department's Records Department. I asked Ms. Ohmer for more information about the name of the system containing the data and how her office was able to obtain this information, since I had already made such a request unsuccessfully. She referred my question to Cheryl Horne.
- 91. On October 8, 2018, Ms. Horne told me that Theresa Withers, supervisor of jail records at the Hamilton County Justice Center, provided her with the records. I asked her if there was a special system or database from which she requested the records, and she said no. In fact, on October 9, 2018, she told me she had not even noticed the reference to microfiche on the records because Ms. Withers had simply pulled them up on her computer when Ms. Horne requested them.

- 92. On October 10, 2018, I twice attempted to call Theresa Withers, the supervisor of records at the Hamilton County Sheriff's Office, at 513-946-6323. There was no answer to either of my calls and no option to leave a message.
- 93. On October 11, 2018, I called Theresa Withers again and spoke with her. I told her I was calling about some records that she had helped Cheryl Horne obtain last week. She interrupted me and said that anyone could help me with that and put me on hold.
- 94. A woman named Aleigha picked up my call and when I explained my request to her, she instructed me to fax in my request on letterhead. I told her that I had done so two years prior, putting the request to the attention of "Kelly." Aleigha confirmed that Kelly used to take care of such requests.
- 95. I asked Aleigha if she knew Jessica Jones. Aleigha stated that Jessica Jones worked in the "main sheriff's office." She said that office is distinct from the Records Division, where Aleigha works.
- 96. I asked Aleigha why Kelly would have referred my request two years ago, which was directed to "Jail Records," to someone in another department, and Aleigh said she did not know.
- 97. Per Aleigha's instructions, I faxed a request to Jail Records at the Hamilton County

 Sheriff's Office for "records of all dates of incarceration" for Linda Reed and Delores

 Suggs. I provided the control numbers for both women in my request.
- 98. On October 12, 2018, I received a return fax from "HSCO Jail Records" that contained my request on letterhead from the day before with additional inscriptions added to it. A copy of that document is attached to this affidavit as Ex. 17.

- 99. Next to Linda Reed's name and control number, "No Records" was written. (Ex. 17 at 2.)
- 100. Four check marks were written next to Delores Suggs's name and control number, and the fax included four letters verifying Delores Suggs's admission to the Hamilton County Justice Center on the following dates: 02/02/11, 10/12/03-10/14/03, 10/6/99-10/7/99, and 8/17/99-9/06/99. (*Id.*)

James Wilson Investigation

- 101. During our call on March 30, 2016, Delores and I also spoke about James Wilson, whom we were having trouble locating. She told me that the church where he would transport her children was far outside of her neighborhood at the time. She estimated it was about a 20-minute drive from her home, possibly in the College Hill area.
- 102. In the remainder of 2016 and beginning of 2017, Mackenzie Breeding made multiple attempts to locate James Wilson. When we were not able to find the right person via any leads generated by online search tools, Delores Suggs drove around the neighborhood where she and Mr. Wilson lived at the time she spoke to him about her conversation with Linda Reed. She provided Ms. Breeding with the address of the building where she thought Mr. Wilson used to live. Ms. Breeding and another investigator in our office, Richard Vickers, knocked on doors of residences in the area in an attempt to find people who might have known Mr. Wilson when he lived there. They were unsuccessful in these efforts.
- 103. On June 1, 2016, a law student extern assisting on the case, Jonathan Elsner, inquired with the Hamilton County 911 Communications Center at (513) 825-2280 about record preservation practices. He learned from the on-duty supervisor, Holly, that the agency

preserved call recordings for 6 months and call records for 2 years. When asked specifically about any records from 1995 to 1998, Holly checked with another operator who worked at the Center during that time. She reported that the only record the Center may have of calls from those years would be a log listing the phone number and a date and time stamp.

- 104. On June 3, 2016, Jonathan Elsner copied records at the library from Cincinnati and Hamilton County directories from the late 1990s in an attempt to find James Wilson's phone number. He examined more than 300 pages of records of residents in the neighborhood where Delores Suggs and James Wilson had lived at the time they talked about Linda Reed. He searched for names that contained or sounded similar to "James," "J.," or "Wilson" and also identified people whose occupation was listed as a driver. He identified phone numbers from the most likely candidates so that we could ask the 911 center to search for a call from those numbers.
- 105. On July 14, 2016, another law student extern assisting on the case, Kelsey Mullen, again contacted the Hamilton County 911 Communications Center to request a search of the phone numbers Mr. Elsner had identified. Ms. Mullen spoke with Holly, who remembered her discussion with Mr. Elsner and said she would call back after speaking with a person familiar with the older phone logs. After doing so, Holly called back and explained that she learned the paper logs only had information dating back to 2006, which was past the time frame that would be useful to us.
- 106. On February 6, 2017, Ms. Breeding sent forty-two letters to occupants of residences nearby where James Wilson may have lived, requesting the recipients let us know if they

- knew Mr. Wilson or his family. An example of one of these letters is attached to this affidavit as Ex. 18. We did not hear back from the recipients of any of these letters.
- 107. On February 12, 2018, after reviewing the websites of several churches in the area in which Delores Suggs recalled James Wilson used to transport her children, Tané Dorsey noticed that one, Friendship Baptist Church, had a bus ministry. She emailed the director of the program, Brent Long, to ask if James Wilson had worked for the church. That same day, Mr. Long wrote back and stated, "We did have a Mr Wilson in our bus ministry but he has been gone for more than 15 years and we do not have his current information in our data base." Ms. Dorsey asked if Mr. Long could provide the last contact information for Mr. Wilson in the church's records, and Mr. Long indicated that the church would require a subpoena to provide their address information in its records for Mr. Wilson. A copy of Ms. Dorsey's email conversation with Mr. Long is attached to this affidavit as Ex. 19.
- 108. Ms. Dorsey attempted to call Mr. Long on February 15, 2018, and left a message for him.
- 109. I attempted to call Mr. Long on February 22, 2018 and learned he was not in that day.
- 110. The next day, February 23, 2018, I called and spoke with Mr. Long and explained why we were trying to find Mr. Wilson. Mr. Long told me that the church's legal counsel advised him not to give out personal information without a subpoena. At my request, he agreed to forward a letter from us to the last address they had in their records for Mr. Wilson.
- 111. On March 7, 2018, Ms. Dorsey emailed a letter to Mr. Long to send to the last address in the church's records for Mr. Wilson. A copy of that email and the letter to Mr. Wilson

attached to it is attached to this affidavit as Ex. 20. We have not heard from Mr. Wilson since sending this letter.

112. On March 7, 2018, Ms. Dorsey sent letters to five people who had previously lived in James Wilson's apartment building at the most current addresses she could locate for them in an attempt to find someone who might have known or could help us locate Mr. Wilson. An example of one of these letters is attached to this affidavit as Ex. 21. None of these efforts yielded any leads, however.

Erin Gallagher Barnhart, Affiant

Sworn to and subscribed before

Me this 2(sr day of December 2018

Notary Public

My commission expires: Does NOT Expire

ARIAL CHILDREN

DAVID C. STEBBINS
Attorney At Law
Notary Public, State of Ohio
My commision has no expiration date
Sec. 147.03 R.C.

You have received a JPGY letter, the fastest way to get mail

From: Tierria R Suggs, CustomerID: 6083919

To: ELWOOD JONES, ID: A339441

Date: 2/12/2016 1:58:10 AM EST, Letter ID: 187665153

Location : CCI Housing : DRDR3317

pre-paid stamp included

Hello, Sir my name is Tierria I don't know you but my mom just came into my room with some shocking news, she said that she was in jail with the man's who committed the crime that you're serving time for wife. Her name is Linda Reed, she lived in Blue Ash, she was having a conversation with my mom while in jail and told her that her husband is the one who killed the lady at the hotel and he framed (the guy) I'm guessing you in the case. My mom said she was just watching a T.v channel where people are arrested but is innocent and though of your case. Maybe this could be information you could use to help with your case. I didn't mean to intrude but it touched me hearing about your story. I have a little more info if you want you can reply. GOD bless you!

FEDERAL PUBLIC DEFENDER SOUTHERN DISTRICT OF OHIO

Chiquita Center 250 East 5th Street, Suite 350 Cincinnati. Ohio 45202 Tel: (513) 929-4834 Fax: (513) 929-4842 Website: www.fpd-ohs.org
One Columbus
10 West Broad Street, Suite 1020
Columbus, Ohio 43215
Tel: (614) 469-2999
Fax: (614) 469-5999

Fifth Third Center
One South Main Street. Suite 490
Dayton, Ohio 45402
Tel: (937) 225-7687
Fax: (937) 225-7688

October 29, 2014

Blue Ash Police Department 4343 Cooper Road Blue Ash, Ohio 45242-5699

Re: Jones v. Warden Chillicothe Correctional Institution, 1:14-cv-00440

To Whom It May Concern,

Please be advised that our office represents Elwood Jones in his immediate legal proceedings. The information requested in this letter is necessary in our efforts to properly represent Mr. Jones. We are requesting that you provide us with any and all police records pertaining to him.

These records should include, but are not limited to:

- All records indicating any of his contact with the police or criminal justice system. Please include information regarding any charges which were withdrawn, dismissed or resulted in a conviction.
- Also, if applicable, please indicate any psychological treatment and/or evaluation either administered or recommended.

To assist you in locating these records, Mr. Jones' birthdate is and his social security number is

An authorization for release of all such records is enclosed for your files. Thank you for your assistance.

Sincerely,

Nikki Spears

Capital Habeas Unit Paralegal

614-469-4126

FEDERAL PUBLIC DEFENDER SOUTHERN DISTRICT OF OHIO

Chiquita Center 250 East 5th Street, Suite 350 Cincinnati, Ohio 45202 Tel: (513) 929-4834 Fax: (513) 929-4842 Website: www.fpd-ohs.org
One Columbus
10 West Broad Street, Suite 1020
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Tel: (614) 469-2999
Fax: (614) 469-5999

Fifth Third Center
One South Main Street, Suite 490
Dayton, Ohio 45402
Tel: (937) 225-7687
Fax: (937) 225-7688

May 8, 2017

Blue Ash Police Department 4343 Cooper Road Blue Ash, Ohio 45242-5699

Re: Public Records Request for All Records for Elwood Jones

To Whom It May Concern,

This letter is a public records request, in accordance with State Ex. Rel. Caster v. The City of Columbus et. al., for Elwood Hubert Jones, birth date and Social Security No. We are requesting that you provide us with all of the police records for any and all cases related to Elwood Jones, specifically including investigatory work product per State Ex. Rel. Caster. Please include records indicating any of his contact with the police or criminal justice system. Please include information regarding any charges which were withdrawn, dismissed, or resulted in a conviction.

If you have any questions or concerns, please feel free to contact me at the number below or at nikki_spears@fd.org. Thank you in advance for your assistance in this matter.

Sincerely,

Nikki Spears

Capital Habeas Unit Paralegal

614-469-4126

DEC 1 6 1998

Perlich, Plaintiff, Sup. Ct. #0055723

DEPUTY CLERK

CINCINNATI CHILD

Judge Gaines

COURT OF COMMON PLEAS DIVISION OF DOMESTIC RELATIONS Filed:02/07/1997 8:04:55 AM

Doc #:97 - 18593 Type: DE Off.Rec.: 7270 30 F

HAMILTON COUNTY RECORDER'S OFFICE

HAMILTON COUNTY, OHIO

EARL REED

S.S. # | D.O.B.

CASE NO. DR 9402727

Plaintiff

Magistrate Levy Judge Gaines

vs.

DECREE OF DIVORCE

LINDA REED

S.S⊕# D.O.B.

I Defendant

This matter came on for hearing on the 16th day of December, on the Complaint of Plaintiff, Plaintiff being present and represented by counsel, and Defendant not present but represented through court appointed Guardian Ad Litem, and the Court finds from the evidence that Defendant has been duly served with Summons and a copy of the Complaint as required by law, which service is hereby approved, and that the Court has jurisdiction of the cause of this action and the parties hereto; that Plaintiff is and was a resident of the State of Ohio for at least six (6) months immediately preceding the date of the filing of the Complaint herein; that the parties were married at Winchester, Virginia on or about March 23, 1969 and that there is one (1) child born the issue of this marriage, who is now emancipated, that the parties have been found to be incompatible and that by reason thereof, Plaintiff is entitled to a divorce.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that 1.

Compliance with Sec. 319,202 R.C. Conveyersis exempt from the under Sec. Sec. 319.94 (f) 3.

> DUSTY RHODES HAMILION COUNTY, OHIO

Barnhart Aff. Ex. 3

7270pc

PLAINTIFF is hereby granted a divorce from DEFENDANT; that the marriage is hereby dissolved and that both of the parties hereto are released from their obligations.

IT IS FURTHER ORDERED that Plaintiff shall retain the property located at 5110 Pfeiffer Road, Cincinnati, Ohio 45242. Plaintiff shall assume sole responsibility and indemnify and hold Defendant harmless for the mortgage on said property, as well as all other costs associated with said residence including, but not limited to, taxes and insurance. On or before the journalization of the Decree of Divorce, Defendant, shall execute a quit claim deed relinquishing Defendant's right, title and interest in said property to Plaintiff. In the event that Defendant is either unwilling to execute said quit claim deed, or is incompetent to do so, then the County Recorder, the State Auditor and any and all other public officials are hereby ordered to accept this Decree in lieu of conveyance of said quit claim deed. However, Defendant shall receive as and for her interest in said property the total sum of \$29,019.13. Said amount shall be paid directly to Defendant's Guardian Ad Litem at the time that Plaintiff refinances said residence in his name. The Guardian Ad Litem shall establish a custodial account for the benefit of Defendant with said funds. Plaintiff shall make all reasonable attempts to refinance said property within thirty (30) days of the journalization of the Decree of Divorce, and shall secure a loan sufficient to satisfy Defendant's interest in the marital residence as well as pay in full the debt due and owing to the Internal Revenue Service as set

Page 3 of 7

forth below.

- 3. IT IS FURTHER ORDERED that each party shall solely and exclusively retain all items of personalty currently in his or her respective possession free and clear from any claim by the other party. However, Plaintiff shall make available to Defendant all of her personal property at such time that Defendant establishes a residence.
- 4. IT IS FURTHER ORDERED that Plaintiff shall solely and exclusively retain the 1982 Cadillac free and clear from any claim Plaintiff shall assume sole responsibility and by Defendant. indemnify and hold Defendant harmless for any and all costs associated with said vehicle. The parties are also joint owners of a 1989 Dodge Dynasty which is owned outright. Plaintiff shall assume responsibility for the cost of any and all repairs necessary to place said vehicle in a marketable condition. Said vehicle shall then be sold and the proceeds generated from the shall first be utilized to reimburse Plaintiff for the cost of repairs. Any remaining proceeds shall be equally divided by the parties. Plaintiff shall forward one-half of said proceeds to the Guardian Ad Litem within seven (7) days of receipt of the same. Said amount shall be placed in the custodial account established for the benefit of Defendant.
- 5. IT IS FURTHER ORDERED that each party shall solely and exclusively retain any and all accounts held in his or her respective name free and clear from any claim by the other party.
 - 6. IT IS FURTHER ORDERED that each party shall solely and

Page 4 of 7

exclusively retain any and all stocks or bonds held in his or her respective name free and clear from any claim by the other party.

- 7. IT IS FURTHER ORDERED that Plaintiff shall solely and exclusively retain interest in his Central States, Southeast and Southwest Areas Pension Fund. However, Defendant shall receive by way of a Qualified Domestic Relations Order the sum of \$516.98 per month. Said funds shall be deposited into the custodial account established for the benefit of Defendant. The Court shall retain jurisdiction until said QDRO is accepted.
- 8. IT IS FURTHER ORDERED that there shall be no exchange of spousal support at this time.
- 9. IT IS FURTHER ORDERED that Plaintiff shall assume sole responsibility for and indemnify and hold Defendant harmless for the following debts and charges incurred during the parties marriage:
 - a. Internal Revenue Service;
 - b. C.G. & E. Co.;
 - c. Citibank; and
 - d. Guardian Ad Litem, \$850.00.
- 10. IT IS FURTHER ORDERED that Defendant shall assume sole responsibility for and indemnify and hold Plaintiff harmless for the following debts incurred during the parties' marriage;
- a. Any and all student loans incurred in Defendant's name; and
- b. \$1,500.00 in medical bills incurred in Defendant's name, as well as all other need to bills incurred by Defendant after 10/25/96 not otherwise covered by insurance 11. IT IS FURTHER ORDERED that all other property of the parties of whatsoever kind, tangible or intangible, whether now

4

owned or hereafter acquired, shall remain the property of the one presently possessing it, or hereafter acquiring it.

- 12. IT IS FURTHER ORDERED that each of the parties shall, from time to time, at the request of the other, execute, acknowledge and deliver to the other party any and all further instruments that may be reasonably required to give full force and effect to the provisions of this Decree, specifically but not limited to indicia of the payment of outstanding debts.
- 13. IT IS FURTHER ORDERED that neither party shall interfere with the other party's right to quiet enjoyment and peaceful living, nor shall either party molest, harass, disturb, torment, interfere with nor annoy the other in any manner directly or indirectly, at home, at place of employment, or anywhere.
- 14. IT IS FURTHER ORDERED that Plaintiff shall assume sole responsibility for his own attorney fees incurred in this matter; all Guardian Ad Litem fees incurred on behalf of Defendant; and all court costs associated with this action.

Earl Reed Plaintiff Diane E. (Perlich Sup.Ct.# 0055723

Attorney for Plaintiff

SALLEE FRY WATERMAN CO., L.P.A.

30 E. Central Parkway

Suite 1500

Cincinnati, Ohio 45202

(513) 421-6000

Kenneth E. Peller/0032074

Guardian Ad Litem for Defendant

1208 Sycamore Street

Cincinnati, Ohio 45210

(513) 241-5670

CARL RELD. OXHIBIT "A"

6/2-140-242 57

All that lot of land set in Section 11, Town 4, Entire Range 1, Miami Purchase, Sycamore Township, Hamilton County, Ohio and being more particularly described as follows:

Beginning at a point in the southerly line of said Section 11, south 81° 35' East 523 feet from the southwest corner of said SEction 11; thence South 81° 35' East along the south line of Section 11 and the center line of Pfeiffer Road 100 feet; thence N. 8° 25' East 230 feet; thence N. 81° 35' West parallel with said center line 100 feet; thence south 8° 25' West 230 feet to the place of beginning.

Subject to all legal highways.

Subject to restrictions and easements of reserved in Deed Book 2433, page 490 of the Deed records of Hamilton County, Ohio.

Being the same premises conveyed to the within grantor by deed recorded in Deed Book 3549, page 714 of the Deed Records of Hamilton County, Ohio.

97764KQ

7270PC

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Page 7 of 7

STATE OF OHIO, COUNTY OF HAMILTON COURT OF COMMON PLEAS

THIS IS TO CERTIFY THAT THE FOREGOING IS A TRUE AND CORRECT COPY OF THE DCCUMENT ON FILE IN THIS OFFICE ENTERED

WILLIECS MY HAND AND SEAL OF SAID COURT

JAMES CISSELL

7270PC . 36

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Erin Barnhart

From: Erin Barnhart

Sent:Wednesday, August 1, 2018 8:44 AMTo:Jones, Jessica (Sheriff's Administration)Cc:Mackenzie Thorpe; Tane Dorsey

Subject: Re: Linda Reed

Great, thank you so much!

~Erin

Sent from my iPhone

On Aug 1, 2018, at 8:41 AM, Jones, Jessica (Sheriff's Administration) < <u>iljones@sheriff.hamilton-co.org</u>> wrote:

The individual I was checking with will be out of the office until Thursday. I will get back with you.

Jessica Jones Administrative Assistant Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

From: Erin Barnhart [mailto:Erin Barnhart@fd.org]
Sent: Wednesday, August 01, 2018 8:39 AM
To: Jones, Jessica (Sheriff's Administration)
Cc: Mackenzie Thorpe; Tane Dorsey

Subject: Re: Linda Reed

Good morning Jessica, I am just checking to see if you were able to find out when the records in the JMS system begin?

Thank you,

~Erin

Sent from my iPhone

On Jul 26, 2018, at 10:56 AM, Jones, Jessica (Sheriff's Administration) <<u>ilijones@sheriff.hamilton-co.org</u>> wrote:

I will see if I can find out.

Jessica Jones Administrative Assistant Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 **From:** Erin Barnhart [mailto:Erin Barnhart@fd.org]

Sent: Thursday, July 26, 2018 10:41 AM **To:** Jones, Jessica (Sheriff's Administration) **Cc:** Mackenzie Breeding; Tane Dorsey

Subject: RE: Linda Reed

Yes, now I understand that retention period was for hard copy records, thank you for clarifying! Is there any way to find out when the records in JMS begin? For instance, does the database include all the records from 1994 forward, or did it begin sometime after that?

Thanks so much,

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

<image001.gif>"Jones, Jessica (Sheriff's Administration)" ---07/26/2018 10:38:32 AM---JMS (Jail Management System) is a database record. I searched the JMS database as far back as it wo

From: "Jones, Jessica (Sheriff's Administration)" < <u>ilijones@sheriff.hamilton-co.org</u>> To: Erin Barnhart < Erin Barnhart@fd.org>

Cc: Mackenzie Breeding Mackenzie Breeding@fd.org, Tane Dorsey Tane Dorsey@fd.org

Date: 07/26/2018 10:38 AM Subject: RE: Linda Reed

erin barnhart@fd.org

JMS (Jail Management System) is a database record. I searched the JMS database as far back as it would go.

Hard copy inmate records/jackets are maintained separately. The retention period I gave you was for the hard copy records/jackets.

There was no database (that I'm aware—and I've been here since 1994) prior to JMS.

Does that help??

Jessica Jones Administrative Assistant Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

From: Erin Barnhart [mailto:Erin Barnhart@fd.org]

Sent: Thursday, July 26, 2018 10:32 AM **To:** Jones, Jessica (Sheriff's Administration) **Cc:** Mackenzie Breeding; Tane Dorsey

Subject: RE: Linda Reed

Thank you, Jessica. I am not sure I understand, however. You were able to send us a JMS record from 1999 (I've attached an example). I'm trying to figure out how far back the records in that system go. For instance, I was expecting to see a record for Delores Suggs from 1994, 1995, or 1996. Is the reason why there aren't results from those years because the database does not have records back that far? I apologize if I am not explaining this well!

~Erin

(See attached file: Suggs, Delores JMS 882610_Redacted.pdf)

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

<image001.gif>"Jones, Jessica (Sheriff's Administration)" ---07/26/2018 10:17:10 AM---Hi Erin, The Sheriff's retention schedule for Inmate Records is the current year plus 2 additional y

From: "Jones, Jessica (Sheriff's Administration)" < jljones@sheriff.hamilton-co.org >

To: Erin Barnhart < Erin Barnhart@fd.org >

Cc: Mackenzie Breeding < Mackenzie Breeding@fd.org >, Tane Dorsey < Tane Dorsey@fd.org >

Date: 07/26/2018 10:17 AM Subject: RE: Linda Reed

erin barnhart@fd.org

Hi Erin,

The Sheriff's retention schedule for Inmate Records is the current year plus 2 additional years.

Jessica

Jessica Jones Administrative Assistant Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F) **From:** Erin Barnhart [mailto:Erin Barnhart@fd.org]

Sent: Thursday, July 26, 2018 10:11 AM **To:** Jones, Jessica (Sheriff's Administration) **Cc:** Mackenzie Breeding; Tane Dorsey

Subject: RE: Linda Reed

Good morning Jessica,

It's been a while since we bothered you, and today I have what I hope is a quick question for you. You previously sent us records for Delores Suggs, DOB 4/30/1969 showing that she was in the JMS four times, the earliest being from 8/17/1999-9/6/1999. My question is, how far back do the JMS records go? Is it possible she was incarcerated at the Hamilton County Jail earlier than 1999 but that stay is not captured in the electronic records?

Thank you so much,

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

Office fax: 614-469-5999

erin_barnhart@fd.org

<image001.gif>Erin Barnhart---07/29/2016 10:35:31 AM---Thank you, thank you,
THANK YOU so, so much!!! ~Erin

From: Erin Barnhart/OHSF/06/FDO

To: "Jones, Jessica (Sheriff's Administration)" < ilijones@sheriff.hamilton-co.org

Cc: Mackenzie Breeding < Mackenzie Breeding@fd.org >

Date: 07/29/2016 10:35 AM Subject: RE: Linda Reed

Thank you, thank you, THANK YOU so, so much!!!

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125

Direct line: 614-469-4125 Office fax: 614-469-5999 erin barnhart@fd.org

 $<\!\!image 001.gif\!\!>\!\!" Jones, Jessica (Sheriff's Administration)" ---07/29/2016 09:39:18 AM---Attached is the Housing History Reports for the dates requested below. Let me know if$

you need anyt

From: "Jones, Jessica (Sheriff's Administration)" < ilijones@sheriff.hamilton-co.org >

To: Erin Barnhart < Erin Barnhart@fd.org>

Cc: Mackenzie Breeding < Mackenzie Breeding@fd.org >

Date: 07/29/2016 09:39 AM Subject: RE: Linda Reed

Attached is the Housing History Reports for the dates requested below. Let me know if you need anything further!

Jessica

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

----Original Message----

From: Erin Barnhart [mailto:Erin Barnhart@fd.org]

Sent: Thursday, July 28, 2016 1:05 PM

To: Jones, Jessica (Sheriff's Administration)

Cc: Mackenzie Breeding
Subject: RE: Linda Reed

I think this just shows people who were admitted on those dates, is that right? That is part of what we want, but is there any way to have records of people who were (still) housed in the jail during those times, even if they were admitted earlier? Does that make sense?

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern
District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999
erin barnhart@fd.org

From: "Jones, Jessica (Sheriff's Administration)"

<jljones@sheriff.hamilton-co.org>
To: Erin Barnhart <Erin_Barnhart@fd.org>

Cc: Mackenzie Breeding < Mackenzie Breeding@fd.org>

Date: 07/28/2016 12:58 PM Subject: RE: Linda Reed

Here is report for 10/06/1999 to 10/07/1999. Would this work?

Jessica Jones

Administrative Secretary
Hamilton County Sheriff's Office
1000 Sycamore Street, Room 110
Cincinnati, Ohio 45202
513-946-6406 (O); 513-946-6402 (F)

----Original Message----

From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]

Sent: Thursday, July 28, 2016 12:51 PM

To: Jones, Jessica (Sheriff's Administration)

Cc: Mackenzie Breeding Subject: RE: Linda Reed

erin_barnhart@fd.org

Yes, that's absolutely fine, we are happy to review and sort ourselves, whatever is easiest for you. Thank you so much, you just made my day!

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern
District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

From: "Jones, Jessica (Sheriff's Administration)"

<jljones@sheriff.hamilton-co.org>

To: Erin Barnhart <Erin_Barnhart@fd.org>

Cc: Mackenzie Breeding <Mackenzie_Breeding@fd.org>

Date: 07/28/2016 12:49 PM Subject: RE: Linda Reed

I think I can run a report of individuals booked into the jail on the dates listed below, but I cannot separate male vs female. It would be everyone....do you think that would suffice?

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

----Original Message----

From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]

Sent: Thursday, July 28, 2016 11:45 AM

To: Jones, Jessica (Sheriff's Administration)

Cc: Mackenzie Breeding Subject: RE: Linda Reed

Jessica,

Once again thank you for your patience and help with my

requests. We still have not located the person we are trying to find and had one other idea for searching:

Would it be possible to request the Jail Management System records for all the women who were in the jail between 8/17/1999 and 9/6/1999; 10/6/1999 and 10/7/1999; 10/12/2003 and 10/14/2003; and on 2/2/2011?

I don't know how large of a number that would be; if we need to narrow the request further we could just request any Caucasian woman housed on those dates, but if it is possible to have all women that would be my preference.

If you can help us out on this, that would be amazing. Thank you so much again for all your assistance!

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern
District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999
erin_barnhart@fd.org

From: Erin Barnhart/OHSF/06/FDO

To: "Jones, Jessica (Sheriff's Administration)"

<jljones@sheriff.hamilton-co.org>

Date: 07/12/2016 06:33 PM Subject: RE: Linda Reed

A belated but still sincere thank you for these, Jessica!

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern
District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999
erin_barnhart@fd.org

From: "Jones, Jessica (Sheriff's Administration)"

<jljones@sheriff.hamilton-co.org>

To: Erin Barnhart <Erin_Barnhart@fd.org>

Date: 07/08/2016 02:12 PM Subject: RE: Linda Reed

Hi Erin,

Attached are the housing and movement history as requested below. I also included the Demographics and Release "page" from the database so you can more easily identify the dates of incarceration.

Social security numbers have been redacted on released documents. This information is subject to an expectation of privacy arising from the Federal Privacy Act (5 U.S.C. Section 552(a) and a constitutional right to privacy in certain circumstances. See State ex rel. Beacon Journal v. Akron (1994), 70 Ohio St.3d 605 and Lambert v. Hartman (2008), 517 F.3d 433.

Jessica

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

----Original Message----

From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]

Sent: Friday, July 08, 2016 9:50 AM

To: Jones, Jessica (Sheriff's Administration)

Subject: RE: Linda Reed

Wonderful, thanks!

erin_barnhart@fd.org

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern
District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

From:

"Jones, Jessica (Sheriff's Administration)"

<jljones@sheriff.hamilton-co.org>

To:

Erin Barnhart

<<u>Erin_Barnhart@fd.org</u>>

Cc:

Mackenzie Breeding
<Mackenzie_Breeding@fd.org>

Date:

07/08/2016 09:35 AM

Subject:

RE: Linda Reed

Thank you! I'll try to get that to you before the end of the

day.

```
Jessica Jones
Administrative Secretary
Hamilton County Sheriff's Office
1000 Sycamore Street, Room 110
Cincinnati, Ohio 45202
513-946-6406 (O); 513-946-6402 (F)
----Original Message----
From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]
Sent: Friday, July 08, 2016 9:08 AM
To: Jones, Jessica (Sheriff's Administration)
Cc: Mackenzie Breeding
Subject: RE: Linda Reed
Yes. 1999 - 2003 and 2011, please.
Thank you!
~Erin
Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern
District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999
erin_barnhart@fd.org
From:
       "Jones, Jessica
(Sheriff's Administration)"
         <jljones@sheriff.hamilton-co.org>
To:
       Erin Barnhart
<Erin_Barnhart@fd.org>
Date:
       07/08/2016 08:26 AM
Subject:
           RE: Linda Reed
Is there a specific time period you are look for, for each?
Jessica Jones
Administrative Secretary
Hamilton County Sheriff's Office
1000 Sycamore Street, Room 110
Cincinnati, Ohio 45202
513-946-6406 (O); 513-946-6402 (F)
----Original Message----
From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]
Sent: Tuesday, July 05, 2016 12:45 PM
To: Jones, Jessica (Sheriff's Administration)
```

Subject: RE: Linda Reed Hello Jessica, I would like to request the housing and movement records for Lori Reed, DOB 04/24/1960, for whom you previously sent JMS records. I would also like to request JMS and housing and movement records for Brenda Reid, DOB 1/21/1963. Thank you so much! ~Erin Erin Gallagher Barnhart The Office of the Federal Public Defender for the Southern District of Ohio Capital Habeas Unit 10 West Broad Street, Suite 1020 Columbus, Ohio 43215-3469 Direct line: 614-469-4125 Office fax: 614-469-5999 erin_barnhart@fd.org From: "Jones, Jessica (Sheriff's Administration)" <jljones@sheriff.hamilton-co.org> To: Erin Barnhart <Erin_Barnhart@fd.org> Date: 06/22/2016 01:38 PM Subject: RE: Linda Reed No problem :) Jessica Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F) ----Original Message----From: Erin Barnhart [mailto:Erin_Barnhart@fd.org] Sent: Wednesday, June 22, 2016 1:36 PM To: Jones, Jessica (Sheriff's Administration) Subject: RE: Linda Reed Thank you again for your assistance, Jessica. I will review

these materials and let you know if I have any further requests after that. I really appreciate your help.

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern
District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125

erin_barnhart@fd.org

Office fax: 614-469-5999

From:

"Jones, Jessica (Sheriff's Administration)" <jljones@sheriff.hamilton-co.org>

To:

Erin Barnhart
<Erin_Barnhart@fd.org>
Date:

06/22/2016 01:32 PM Subject:

RE: Linda Reed

Erin,

Attached are three records located in the Jail Management System Database for Linda Clark, DOB 01/20/1956 and four records for Lori Reed DOB 04/24/1960.

Also attached is the housing and movement records requested for Delores Suggs.

Please let me know if additional information is needed.

Jessica

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

----Original Message----

From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]

Sent: Tuesday, June 14, 2016 4:23 PM

To: Jones, Jessica (Sheriff's Administration)

Subject: Re: Linda Reed

Thank you for contacting me, Jessica. I am actually trying to locate someone who was in the Hamilton County jail whom I know

was named Linda Reed (or possibly Reid) and whom I know was Caucasian, but I don't know her DOB. Is it possible for you to provide me with the information about any Linda Reed or Linda Reid who was housed there during those years?

I do have one other way of potentially narrowing it down, which would be to first give me that information for any time Delores Suggs, DOB 4/30/1969, was housed. I believe that Linda and Delores were housed at the same time, so if I first know the dates when Delores was there, I would just need to request any Linda whose stay overlapped with Delores's. And if you need me to send an additional request for Suggs on letterhead, I can certainly do so.

Thank you so much for you assistance, and please let me know if you need any more information from me.

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern
District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

From:

10.

"erin_barnhart@fd.org"
<erin_barnhart@fd.org>
Date:

erin_barnhart@fd.org

06/14/2016 04:09 PM Subject:

Linda Reed

Hi Erin,

I received your letter requesting records for "REED, LINDA" from 1995 through 2000. Can you provide additional demographic information (DOB,

etc.) so we can send you the records for the correct Linda Reed?

Thank you!

Jessica

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

[attachment "Delores Suggs JMS 1074345 Movement History.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 1417710 HousingHistory.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 1417710 Movement History.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 1417710 Release.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Linda Clark JMS 908087_Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FD0] [attachment "Linda Clark JMS 909144 Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Linda Clark JMS 1052445_Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Lori Reed JMS 1074204_Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Lori Reed JMS 1086454_Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FD0] [attachment "Lori Reed JMS 1136834_Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Lori Reed JMS 1251880_Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 882610 Housing History.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 882610 Movement History.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 882610 Release.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 890209 Housing History.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 890209 Movement History.pdf deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs JMS 890209 Release.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Delores Suggs 1074345 Housing History.pdf" deleted by Erin Barnhart/OHSF/06/FDO]

[attachment "Brenda Reid JMS #1066096.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #1066163.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #1435434.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Lori Reed JMS #1074204.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Lori Reed JMS #1086454.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Lori Reed JMS #1136834.pdf" deleted by Erin Barnhart/OHSF/06/FD0] [attachment "Lori Reed JMS #1251880.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #863682.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #875600.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #942707.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #953916.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #961516.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #964195.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #976254.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #1010698.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid JMS #1023860.pdf"

deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid

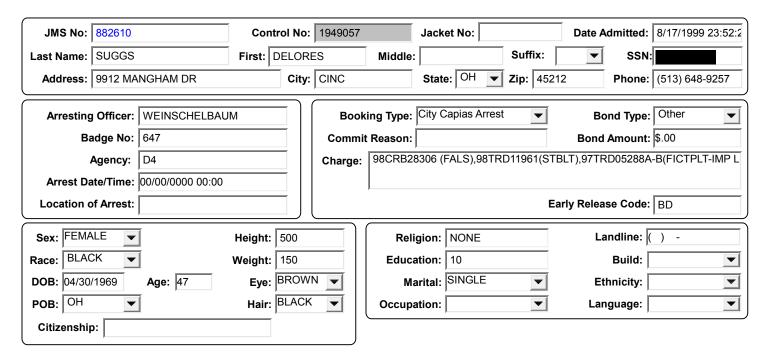
JMS #1028142.pdf"
deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Brenda Reid
JMS #1039840.pdf" deleted by Erin Barnhart/OHSF/06/FDO]
[attachment "Brenda Reid JMS #1045458.pdf" deleted by Erin

Barnhart/OHSF/06/FDO]

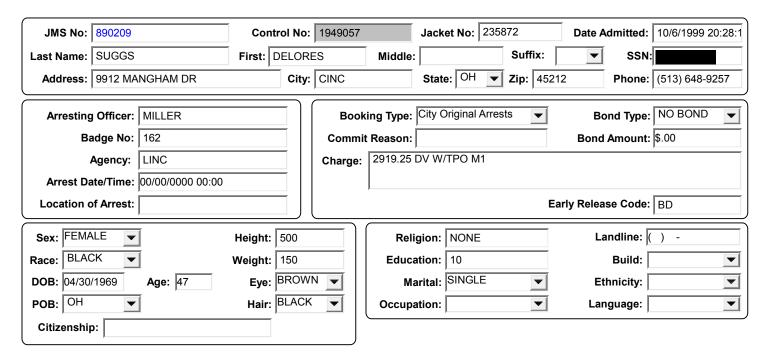
[attachment "Booking 100699-100799.xps" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Housing History report.xps" deleted by Erin Barnhart/OHSF/06/FDO]

[attachment "Housing History Report 101203-101403.xps" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Housing History Report 100699-100799.xps" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Housing History Report 081799-090699.xps" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Housing History Report 020211.xps" deleted by Erin Barnhart/OHSF/06/FDO]

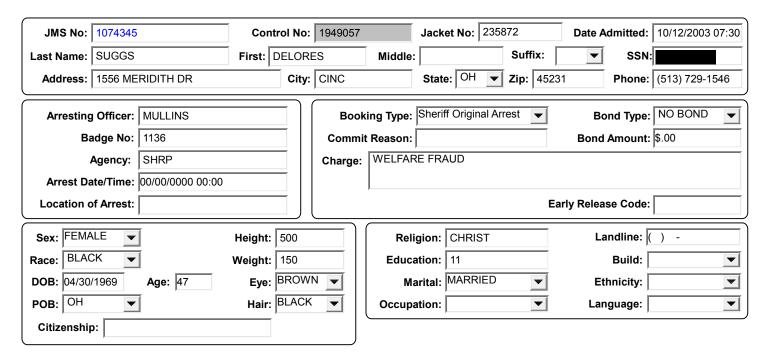
Hamilton County Jail Management System (JMS) Demographics - 882610 SUGGS, DELORES



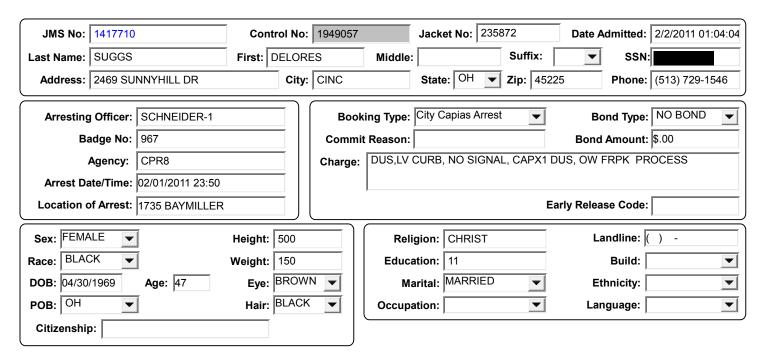
Hamilton County Jail Management System (JMS) Demographics - 890209 SUGGS, DELORES



Hamilton County Jail Management System (JMS) Demographics - 1074345 SUGGS, DELORES



Hamilton County Jail Management System (JMS) Demographics - 1417710 SUGGS, DELORES





RE: Linda Reed

Jones, Jessica (Sheriff's Administration)

06/15/2016 09:17 AM

To:

Erin Barnhart

Hide Details

From: "Jones, Jessica (Sheriff's Administration)" <jljones@sheriff.hamilton-co.org>

 $To: Erin\ Barnhart <\!Erin_Barnhart@fd.org\!>$

History: This message has been forwarded.

4 Attachments





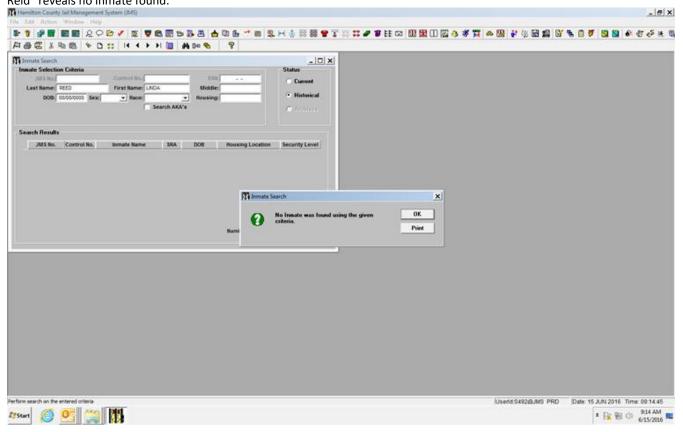


 $Suggs, Delores\ JMS\ \overline{1417710}_Redacted.pdf\ Suggs, Delores\ JMS\ 890209._Redacted.pdf\ Suggs, Delores\ JMS\ \overline{882610}_Redacted.pdf$

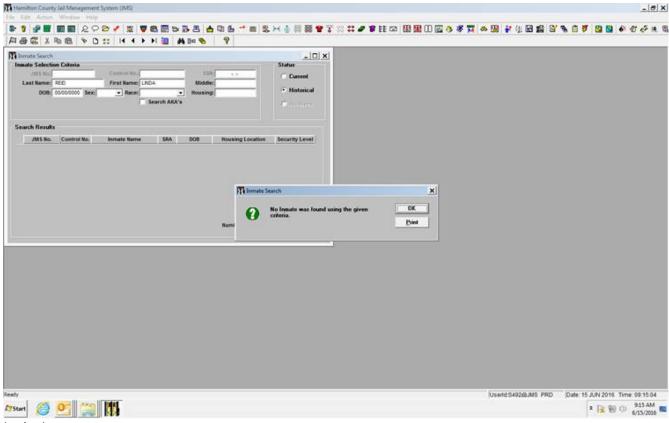


Suggs, Delores JMS 1074345_Redacted.pdf

Attached is the info for Delores Suggs, but as you can see from the screenshots below, a search of "Linda Reed" and "Linda Reid" reveals no inmate found.



Barnhart Aff. Ex. 8



Jessica Jones

Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

----Original Message-----

From: Erin Barnhart [mailto:Erin Barnhart@fd.org]

Sent: Tuesday, June 14, 2016 4:23 PM To: Jones, Jessica (Sheriff's Administration)

Subject: Re: Linda Reed

Thank you for contacting me, Jessica. I am actually trying to locate someone who was in the Hamilton County jail whom I know was named Linda Reed (or possibly Reid) and whom I know was Caucasian, but I don't know her DOB. Is it possible for you to provide me with the information about any Linda Reed or Linda Reid who was housed there during those years?

I do have one other way of potentially narrowing it down, which would be to first give me that information for any time Delores Suggs, DOB 4/30/1969, was housed. I believe that Linda and Delores were housed at the same time, so if I first know the dates when Delores was there, I would just need to request any Linda whose stay overlapped with Delores's. And if you need me to send an additional request for Suggs on letterhead, I can certainly do so.

Thank you so much for you assistance, and please let me know if you need any more information from me.

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469

Direct line: 614-469-4125 Office fax: 614-469-5999 erin_barnhart@fd.org

From: "Jones, Jessica (Sheriff's Administration)"

<jljones@sheriff.hamilton-co.org>

To: "erin_barnhart@fd.org" <erin_barnhart@fd.org>

Date: 06/14/2016 04:09 PM Subject: Linda Reed

Hi Erin,

I received your letter requesting records for "REED, LINDA" from 1995 through 2000. Can you provide additional demographic information (DOB,

etc.) so we can send you the records for the correct Linda Reed?

Thank you!

Jessica

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F) {In Archive} RE: Linda Reed 🗎

Erin Barnhart to: Jones, Jessica (Sheriff's Administration)

Bcc: Mackenzie Breeding

Archive: This message is being viewed in an archive.

Jessica,

Thank you for this helpful information. After doing a little more research, we found a Linda Reed who also went by a few other names. Would you please see whether jail records exist for a woman with a DOB of 1/20/1956 named either Linda Clark, Linda Flory, Sue Flory, or Sue Reed?

In addition, could you please provide records for a Lori Reed, DOB 4/24/1960?

Finally, could you provide the jail movement records for each of Delores Suggs's stays for which you sent me demographic information?

I really appreciate your assistance. Please let me know if you need any further information.

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614 469 4125

Direct line: 614-469-4125 Office fax: 614-469-5999 erin_barnhart@fd.org

"Jones, Jessica (Sheriff's Administration)" Attached is the info for D... 06/15/2016 09:17:32 AM

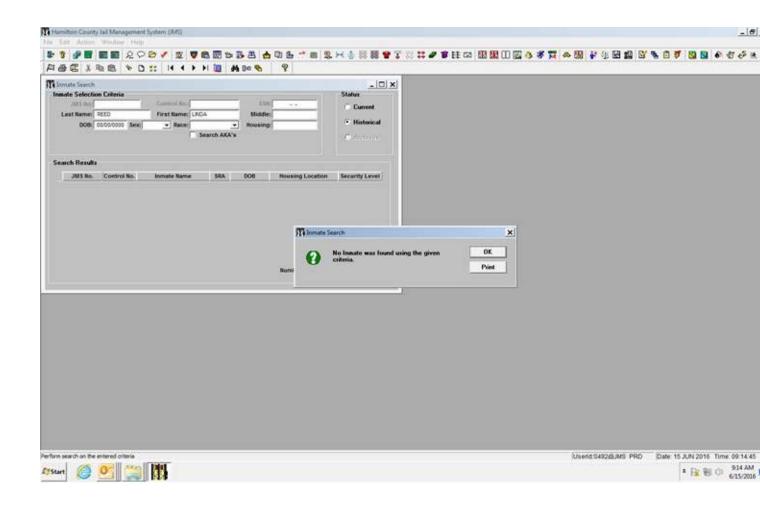
From: "Jones, Jessica (Sheriff's Administration)" <ili>jljones@sheriff.hamilton-co.org>

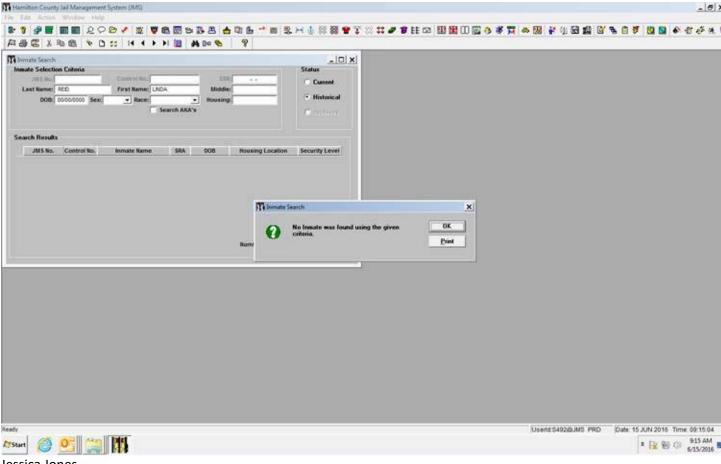
To: Erin Barnhart < Erin_Barnhart@fd.org>

Date: 06/15/2016 09:17 AM Subject: RE: Linda Reed

Attached is the info for Delores Suggs, but as you can see from the screenshots below, a search of "Linda Reed" and "Linda Reid" reveals no inmate found.

06/16/2016 02:43 PM





Jessica Jones

Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

----Original Message-----

From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]

Sent: Tuesday, June 14, 2016 4:23 PM To: Jones, Jessica (Sheriff's Administration)

Subject: Re: Linda Reed

Thank you for contacting me, Jessica. I am actually trying to locate someone who was in the Hamilton County jail whom I know was named Linda Reed (or possibly Reid) and whom I know was Caucasian, but I don't know her DOB. Is it possible for you to provide me with the information about any Linda Reed or Linda Reid who was housed there during those years?

I do have one other way of potentially narrowing it down, which would be to first give me that information for any time Delores Suggs, DOB 4/30/1969, was housed. I believe that Linda and Delores were housed at the same time, so if I first know the dates when Delores was there, I would just need to request any Linda whose stay overlapped with Delores's. And if you need me to send an additional

request for Suggs on letterhead, I can certainly do so.

Thank you so much for you assistance, and please let me know if you need any more information from me.

~Frin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125

Office fax: 614-469-4125 erin_barnhart@fd.org

From: "Jones, Jessica (Sheriff's Administration)"

<jljones@sheriff.hamilton-co.org>

To: "erin_barnhart@fd.org" <erin_barnhart@fd.org>

Date: 06/14/2016 04:09 PM Subject: Linda Reed

Hi Erin,

I received your letter requesting records for "REED, LINDA" from 1995 through 2000. Can you provide additional demographic information (DOB, etc.) so we can send you the records for the correct Linda Reed?

Thank you!

Jessica

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

[attachment "Suggs, Delores JMS 1417710_Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Suggs, Delores JMS 890209._Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Suggs, Delores JMS 882610_Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "Suggs, Delores JMS 1074345 Redacted.pdf" deleted by Erin Barnhart/OHSF/06/FDO]

From: <u>Jones, Jessica (Sheriff"s Administration) < jljones</u>

To: <u>Tane Dorsey</u>

Subject: RE: Hamilton County Jail Records

Date: Friday, February 2, 2018 3:53:00 PM

Attachments: Angela Early JMS #890208 Redacted.pdf

Here you go.

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

From: Tane Dorsey [mailto:Tane_Dorsey@fd.org]
Sent: Tuesday, January 30, 2018 12:13 PM
To: Jones, Jessica (Sheriff's Administration)
Subject: RE: Hamilton County Jail Records

Hello,

May I also have the record for Angela Early who was housed at the Hamilton County Jail on 10/6/1999 and 10/7/1999?

Thank you,

"Jones, Jessica (Sheriff's Administration)" ---01/12/2018 09:26:40 AM---Tane, Attached are 9 records from the Hamilton County Jail Management System database responsive to

From: "Jones, Jessica (Sheriff's Administration)" < <u>ilijones@sheriff.hamilton-co.org</u>>
To: Tane Dorsey < <u>Tane Dorsey@fd.org</u>>
Date: 01/12/2018 09:26 AM
Subject: RE: Hamilton County Jail Records

Tane,

Attached are 9 records from the Hamilton County Jail Management System database responsive to your request. No record was located for Linda Hendrickson jail 08/03/1999; no record was located for Linda Rodgers jailed 09/23/2003 (included for your convenience is a record for Linda Roggers who was incarcerated at that time period).

Social security numbers have been redacted on released documents. This information is subject to an expectation of privacy arising from the Federal Privacy Act (5 U.S.C. Section 552(a) and a constitutional right to privacy in certain circumstances. See State ex rel. Beacon Journal v. Akron (1994), 70 Ohio St.3d 605 and Lambert v. Hartman (2008), 517 F.3d 433.

If you have any questions or need additional information, please forward your request to my attention.

Jessica

Jessica Jones Administrative Secretary Hamilton County Sheriff's Office 1000 Sycamore Street, Room 110 Cincinnati, Ohio 45202 513-946-6406 (O); 513-946-6402 (F)

From: Tane Dorsey [mailto:Tane Dorsey@fd.org]
Sent: Wednesday, December 27, 2017 8:32 AM
To: Jones, Jessica (Sheriff's Administration)
Subject: Hamilton County Jail Records

Good Morning,

I hope your Holiday was well. I was given your contact information from Erin Gallagher Barnhart in my office. You may remember corresponding with Erin and also Mackenzie Breeding regarding jail information in 1999, 2003, and 2011.

As a follow-up to their requests, I would like to request any/all available County Jail Records for a Linda Gail Brown DOB 9/15/52. She may have also gone by Linda McDowell, Linda Nasrallah, or possibly some other last name.

In addition, I would like to request any/all jail records for Linda Jackson jailed 8/27-8/28 1999
Linda Mackillop jailed 9/15-9/19 1999
Linda White jailed 9/9/99
Linda Hendrickson jailed 8/3/1999 and 7/6/1999
Linda Addison jailed 9/26-9/30 2003
Linda Curtis jailed 10/12-10/13 2003
Linda Rodgers jailed 9/23/2003
Linda Peterson jailed 8/10-8/13 1999

Thank you for your assistance. [attachment "Linda Mackillop JMS #886963_Redacted.pdf" deleted by Tane Dorsey/OHSF/06/FDO] [attachment "Linda Peterson JMS #881400_Redacted.pdf" deleted by Tane Dorsey/OHSF/06/FDO] [attachment "Linda Rogers JMS #1071608_Redacted.pdf" deleted by Tane Dorsey/OHSF/06/FDO] [attachment "Linda White JMS #886102_Redacted.pdf" deleted by Tane Dorsey/OHSF/06/FDO] [attachment "Linda Addison JMS #1070264_Redacted.pdf" deleted by Tane Dorsey/OHSF/06/FDO] [attachment "Linda Brown JMS #409141_Redacted.pdf" deleted by Tane Dorsey/OHSF/06/FDO] [attachment "Linda Curtis JMS #1074355_Redacted.pdf" deleted by Tane Dorsey/OHSF/06/FDO] [attachment "Linda Hendrickson JMS #876320.pdf" deleted by Tane Dorsey/OHSF/06/FDO] [attachment "Linda Jackson JMS #884230_Redacted.pdf" deleted by Tane Dorsey/OHSF/06/FDO]



RE: Request for records pertaining to a residence

Deye, Kevin

to:

'Erin Barnhart' 03/26/2018 03:50 PM

Hide Details

From: "Deye, Kevin" <kdeye@BlueAsh.com>
To: 'Erin Barnhart' <Erin_Barnhart@fd.org>
History: This message has been forwarded.

What I'm saying is there is no "white card" (aka index card) for Scott Reed. Without that, I'm basically unable to look up any records for him unfortunately. I'm not sure if there never was one or if it's missing. I wish I could help you more.

Kevin Deye Police Technical Services Specialist Blue Ash Police Department 4343 Cooper Rd. Blue Ash, OH 45242 (513) 745-8687 Website Facebook



From: Erin Barnhart [mailto:Erin Barnhart@fd.org]

Sent: Monday, March 26, 2018 3:49 PM

To: Deye, Kevin

Subject: RE: Request for records pertaining to a residence

Thank you for this, Kevin. Just to be clear by saying there's no master file for Scott Reed, does that also mean there are no index cards for him either?

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

Office fax: 614-469-5999 erin_barnhart@fd.org

"Deye, Kevin" ---03/20/2018 02:31:44 PM---Erin, I looked up his Mayor's Court record and was able to find the above 11 cases on him. I attach

From: "Deye, Kevin" < kdeye@BlueAsh.com > To: 'Erin Barnhart' < Erin Barnhart@fd.org >

Date: 03/20/2018 02:31 PM

Subject: RE: Request for records pertaining to a residence

Barnhart Aff. Ex. 11

Erin,

I looked up his Mayor's Court record and was able to find the above 11 cases on him. I attached all the dockets that would apply to each case. I also did not see any master file for a Scott Reed. If there is anything else you need, please let me know.

Kevin Deye Police Technical Services Specialist Blue Ash Police Department 4343 Cooper Rd. Blue Ash, OH 45242 (513) 745-8687 Website Facebook



From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]

Sent: Tuesday, March 20, 2018 10:12 AM

To: Deye, Kevin

Subject: Re: Request for records pertaining to a residence

Kevin,

Thanks for this information. Could I get copies of the log book pages you mentioned with journal entries?

I would appreciate any court dockets that exist too. Basically I'm grateful for any material you have for Earl or Linda Reed. They also had a son, Scott Reed. If you have any documents related to him could I also get copies of those?

Thanks so much for all your assistance.

~Erin

Sent from my iPhone

On Mar 20, 2018, at 7:18 AM, Deye, Kevin < <u>kdeye@BlueAsh.com</u>> wrote: I definitely will get it your way if it turns up.

As for the address in Grove City, I would say yes. At one point they must have found contact info for him living up there and added it to the card.

In interpreting the cards, the right hand column refers to our file number. CA is criminal arrest, AA or TA is Auto Accident, OF is general offense report, DOM is domestic violence incident report, AC is for aided case and I'm not sure why the five on the second page with a B are references to warrants. I can tell you of everything on his card, besides additional journal entries in log books, we have no paperwork on any of them due to record retentions. I

was amazed when you sent me to two arrest sheets you had because even we don't have those anymore.

We will have court dockets if you need me to look any of those up. It appears the only items that may be on it though are all tax cases. Just let me know so I know if I need to dig through the old paper log books for that information.

The 12/15/94 entry is an aided case which is generally (not always) a psych run. Speaking with some of our older retired and came back part time officers, Linda Reed started to have some psychological issues in her older age. So I would interpret this to be they had a psych run to their house where Earl called the police/EMS on his wife, Linda, for having a psych episode of some sort. Again, I wish I could tell you more.

I'll go over and look for Linda's file again today so please let me know if you need any of those tax court cases as well so I can pull those out and scan for you.

Kevin Deye
Police Technical Services Specialist
Blue Ash Police Department
4343 Cooper Rd.
Blue Ash, OH 45242
(513) 745-8687
Website Facebook
<image001.png>

From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]

Sent: Monday, March 19, 2018 6:14 PM

To: Deye, Kevin

Subject: RE: Request for records pertaining to a residence

Kevin,

Thank you for these records. If Linda Reed's card(s) turn up, would you please send me a copy of that information?

I noticed that the second card notes Earl Reed "also has address of: 4029 Marlane Dr. Grove City, O 43123." Would I need to contact Grove City police to request records associated with that address?

In addition, I would like to obtain as many records as possible associated with these entries. Am I correct that the alpha-numeric codes to the right of each entry are police report numbers? Could I get copies of those police reports? Also, if there are mayors court materials associated with any of these incidents, could I obtain copies of the materials in those cases?

Finally, can you interpret what the 12/15/94 entry for "Compl. of Mental Sub; wife, Linda Reed" means? I am assuming Complaint but what is Mental Sub?

Thank you for your continued assistance,

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999
erin barnhart@fd.org

<image002.gif>"Deye, Kevin" ---03/05/2018 01:27:21 PM---Erin, Here is what I have for you. Prior to 2005 is all paper records. The only search we have bac

From: "Deye, Kevin" < kdeye@BlueAsh.com>
To: 'Erin Barnhart' < Erin Barnhart@fd.org>

Date: 03/05/2018 01:27 PM

Subject: RE: Request for records pertaining to a residence

Erin,

Here is what I have for you. Prior to 2005 is all paper records. The only search we have back then is by people's names and are filed on 5x7 index cards. I looked up both Earl and Linda Reed and could only find our files on Earl (see attached.) Not sure where the card for Linda went since she has history with us. Unfortunately, I do not have any way to look for address history prior to 2005. I did flip through all the cards with a last name of Reed and this was the only one at 5110 Pfeiffer Rd. If you happen to have any other names for me to search through, I will check again.

Kevin Deye
Police Technical Services Specialist
Blue Ash Police Department
4343 Cooper Rd.
Blue Ash, OH 45242
(513) 745-8687
Website Facebook
<image 001.png>

From: Erin Barnhart [mailto:Erin_Barnhart@fd.org]

Sent: Friday, March 02, 2018 1:13 PM

To: Deye, Kevin **Cc:** Records

Subject: RE: Request for records pertaining to a residence

I do get that Old Pfeiffer Ln address when I google 5110 Pfeiffer Road, but that is the address on several legal documents I've found, including two that I have attached here that use that address for Blue Ash arrest and investigation reports. Does using the Old Pfeiffer Ln address retrieve these two documents?

How far back do the records go? I am interested in as far back as possible.

Thank you for your assistance!

~Erin

(See attached file: 1995.10.28 Linda Reed 527 Arrest Record.pdf)

(See attached file: 1996.05.12 Earl Reed 527 arrest record.pdf)

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125

Office fax: 614-469-5999 erin barnhart@fd.org

<image002.gif>"Deye, Kevin" ---03/02/2018 12:56:16 PM---How far back do you want to go and could it be 5110 Old Pfeiffer Ln? We do not have a 5110 Pfeiffer

From: "Deye, Kevin" < kdeye@BlueAsh.com>

To: 'Erin Barnhart' < Erin Barnhart@fd.org >, Records < Records@BlueAsh.com >

Date: 03/02/2018 12:56 PM

Subject: RE: Request for records pertaining to a residence

How far back do you want to go and could it be 5110 Old Pfeiffer Ln? We do not have a 5110 Pfeiffer Rd in our city.

Kevin Deye
Police Technical Services Specialist
Blue Ash Police Department
4343 Cooper Rd.
Blue Ash, OH 45242
(513) 745-8687
Website Facebook
<image001.png>

From: Erin Barnhart [mailto:Erin Barnhart@fd.org]

Sent: Friday, March 02, 2018 12:31 PM

To: Records

Subject: Request for records pertaining to a residence

Dear Mr. Deye,

I would like to request any records concerning 5110 Pfeiffer Rd, 45242 in your files, including reports associated with that address and any runs or calls to that address. Please let me know if you need any further information.

Thank you,

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

<u>erin barnhart@fd.org</u> [attachment "20180305142342.pdf" deleted by Erin Barnhart/OHSF/06/FDO] [attachment "20180320142607.pdf" deleted by Erin

Barnhart/OHSF/06/FDO]

		C	ARD #3	CNTL: 75	7836		79	3-1892	
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1/	/1/99	Traffic	Fail to	Control M	.V.	\$40+cc		99-TA-0	002
1-1	99	Traffic	- leaving se	cene of AA	dism	issed			
1/3/0)1 A	AKenwoo	d & Brasher					01-AA-00)3

F	REED, Earl L. M-W 2-14-24 5110 Pfeiffer Rd.	
4-28-88	also has address of:4029 Marlar warrant entered - FTA on tax viola.	ne Dr. Grove City, O. 43123 B54206
5-1-88 7-7-88	warrant cancelled - bond posted Did not appear - bond forfeited - another warrant issued	B54206
7-12-88 11-16-89 11-30-89	Warrant cancelled - \$100 bond posted tax violation - dismissed 5-2-91	
4-20-90	additional warrant for FTA on tax viol added to	CA-876-89 B54646 B54646
4-3-91 4-10-90	warrant cancelled - they are filing bankruptcy tax violation - dismissed 5-2-91	B54646 CA-407-90
11/05/93 12/17/93 4-19-94	Complaint against for Domestic Violence Victim: Linda J. Reed Complaint against for Domestic Dispute—Victim: Linda J. Reed bldg. code viol. 50+cc	DOM-62-93 DOM-76-93
	Compl. of Mental Sub; wife, Linda Reed Complaint Against for Domestic Violence (Victim: Linda Reed)	94-CA-0363 94-AC-153
05/12/96 A	Arrested for Domestic Violence	96-028-DV 96-CA-375

处性 严 对孔

Denta Par	DOB: 2/14/24 SS#	Ello Desiges Da	793-8092
Reed, Lai	rl L. MW46	5110 Pfeiffer Rd.	193-0092
5-10-74	Offense Report - shooting in B.A.	- complainant	OF-192-74
6-20-74	AA		AA-181-74
12-10-76	Summors - Tax off. failed to make payr	DISMISSEDING	A-270.76
6-6-77	Summons - tax off, failed to make payr	ments \$25+10+3	CA-125=7.7
7-5-80	reported grand larceny of 2 bicycles	from porch	80-239
8-23-80	Summons - tax compl. \$50+5+3		CA-533-80
12-1-81	victim- AA (mailbox struck)		AA-375-81
5-16-83	Tax summons, failed to make payments	\$50/costs remitted	CA-293-83
9-5-83	Complaint against re barking dog warr	ned by Lt. Suter - very	cooperative,
	took dog in at once.		
4-13-84	summons - tax office - failed to respond	d to subpoena, failed to	o pay tax CA-160-84
3-22-85	Tax violation - \$50 payout		CA-268-85.
8-28-85	Tax violation \$50 payout		CA-573-85
8-21-87	Tax violation \$50 payout		CA-752-87
2-12-88	tax viol. costs remitted		CA-238-88



RE: Record request for 9117 Cincinnati-Columbus Road Public Records

to:

'Erin Barnhart' 03/14/2018 09:48 AM

Hide Details

From: Public Records < Public Records @WestChester OH. Org >

To: 'Erin Barnhart' < Erin_Barnhart@fd.org> History: This message has been replied to.

1 Attachment



Erin Gallangher.pdf

Good Morning,

Enclosed are the Calls for Service and 2 reports that were filed in 2000 to 2002.

Thank you,

Linda Williams West Chester Police Central Records 9577 Beckett Road Suite 500 West Chester, Ohio 45069 513-759-7286

From: Erin Barnhart [mailto:Erin Barnhart@fd.org]

Sent: Tuesday, March 13, 2018 9:50 AM

To: Public Records < Public Records @ West Chester OH. Org > **Subject:** Record request for 9117 Cincinnati-Columbus Road

Hello,

I am seeking any records pertaining to a nursing home that operated at 9117 Cincinnati-Columbus Road in West Chester, 45069. The name of the business was West Chester Health Care (it may have also been called West Chester Health & Rehabilitation Center), phone number 513-777-6164. Please let me know if you require additional information.

Thank you,

~Erin

Erin Gallagher Barnhart
The Office of the Federal Public Defender for the Southern District of Ohio
Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, Ohio 43215-3469
Direct line: 614-469-4125
Office fax: 614-469-5999

Office fax: 614-469-5999 erin barnhart@fd.org

Barnhart Aff. Ex. 13



Reed Grener, Laurie

to:

erin_barnhart@fd.org 03/22/2018 12:45 PM

Hide Details

From: "Grener, Laurie" < lgrener@grovecityohio.gov>
To: "erin_barnhart@fd.org" < erin_barnhart@fd.org>

History: This message has been forwarded.

We do not have any records for Earl, Linda or Scott Reed. The address 4029 Marlane Dr is the Travelodge.

Thank you,

Laurie Grener Records Specialist

Grove City Division of Police

614-277-1714

lgrener@grovecityohio.gov

policerecords@grovecityohio.gov

Barnhart Aff. Ex. 14

Certification of Medical Records Custodian

NO RECORDS STATEMENT

I, the undersigned, being the duly authorized medical records custodian or other qualified witness declare the following: A thorough search of our files, carried out under my direction revealed no documents, records or other materials called for in the request for medical records identified below. No Records for Mercy West Hospital

Request for medical records for: LINDA REED

06/14/1940

Patient date of birth or social security number

Records request to: OFFICE OF THE FEDERAL PUBLIC DEFENDER SOUTHERN DISTRICT OF OHIO

Name of requesting party or organization

Date of request:

May 16, 2018
Date of request

I DECLARE, UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND CORRECT.

Signed On:

May 17,2018

Dota

Signature:

Becky Chadwell

Name:

BECKY CHADWELL

Print name

Mercy Hospital West 3300 Mercy Health Blvd. Cincinnati, OH 45211

Capital Habeas Unit 10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender

Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

י ווטו

April 5, 2018

MAY 8 2018

Mercy Health West Hospital 3300 Mercy Health Blvd. Cincinnati, Ohio 45211

Re: Records Request for patient Linda Reed

To Whom It May Concern:

Please be advised that our office is in need of medical records for patient Linda Reed; therefore, I am writing to request any and all medical records for the deceased, Mrs. Reed, including, but not limited to:

.. ..

- Admission and release dates;
- Presenting problems, diagnoses, treatment plans and attending physicians' names;
- Prescriptions;
- Testing and test outcomes, including: x-rays, psychological evaluations, urine tests, blood tests, CAT scans, etc.;
- · Surgical records;
- Chart notes; and,
- Birth-related records.

A signed Next of Kin Release of Records by Deborah K. Wood is enclosed. To assist you in locating these records, Mrs. Reed's birth date is and her social security number is a second security number.

In addition to our above records request, please indicate the name of your agency's custodian of records, as it may be necessary to have the authenticity of the documents verified. Also, please certify the records as a complete and accurate copy of the originals. If, due to hospital policy, any of the medical records no longer exists, please provide a copy of such policy with your response.

Page 2 of 2

Thank you very much for your assistance in this matter. If you have any questions or concerns regarding these requests, please do not hesitate to contact me at the number or email below.

Sincerely,

Nikki Spears

Capital Habeas Unit Paralegal

nikki.spears@fd.org

614-469-4126

Enclosure

Capital Habeas Unit 10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender

IVILLY I TO I CO I LE LA LA F IVI

Phone: (614) 469-299 Toll Free: (877) 217-4835 Fax: (614) 469-5999

AUTHORIZATION FOR NEXT OF KIN RELEASE OF RECORDS

1. Deborate L	wood ,	DOB;	Social	Security	Number:
), a n	ext of kin to Ni	ece-Lina			
DOD: 9-19-02 Soc	ial Security Numb	ier:	her	eby declare	E **
Linda Red	inspection and	photocopying	any and al	l records	regarding
Federal Public Defender, 1	U West Broad St	reef, Suite 1020), Columbus,	OH, 43215	i,

- 2. This authorization includes but is not limited to records normally considered privileged and confidential, including but not limited to any and all of the following: employment records; Social Security records: financial records, including IRS tax returns: social service agency records; school records, including but not limited to teacher evaluations, grades, raw test data, evaluations of raw test data, intelligence testing records, counseling records, and health records; juvenile court records; foster care records: military records; prison, jail, and other federal, state, or local incarceration records; criminal case records, including but not limited to attorney and investigation files; court records: FBI and other federal, state, or local law enforcement records: medical records: psychotherapy records: birth or death certificates.
- eonfidential maintenance of these records, including any such rights that exist under local, state, and federal statutory and/or constitutional law, rule or order.
 - 4. This authorization and release shall remain valid and in effect until such time as I expressly revoke this consent.
 - 5. A photocopy of this release shall be the same as the original.
 - 6. Lunderstand that I can change my mind and revoke this authorization in writing at any time by sending a signed and dated written statement to the Capital Habeas Unit, stating that I am revoking my authorization, except to the extent that the person(s) and/or organization(s) named above have already taken action in reliance on this authorization.

- 7. Any and all previous authorizations for release of the above identified records signed or otherwise made by me are hereby revoked.
- 8. I have had ample opportunity to read and consider the content of this authorization. I affirm that the contents of this authorization are consistent with my direction.
- 9. I am signing this authorization voluntarily and of my own free will. I understand that I can refuse to sign this authorization.

Date: 3/21/18

Deboral KWood



FAX

Mercy Health Release of Information 7500 State Road Cincinnati, OH 45255 (513) 233-6910 PHONE (513) 624-4074 FAX

Date: 4/194/18

TO: NIKKI SPEARS

From: Mercy Health -Release of Info.-Jud

Fax#: 614-469-5999

of pages:

no Records for Linda Reed

Subject: Record request

Capital Habeas Unit 10 West Broad Street, Suite 1020

Columbus, OH 43215

Deborah L. Williams Federal Public Defender Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

April 5, 2018

Mercy Health Fairfield Hospital 3000 Mack Rd. Fairfield, Ohio 45014

Re: Records Request for patient Linda Reed

To Whom It May Concern:

Please be advised that our office is in need of medical records for patient Linda Reed; therefore, I am writing to request any and all medical records for the deceased, Mrs. Reed, including, but not limited to:

- Admission and release dates;
- Presenting problems, diagnoses, treatment plans and attending physicians' names;
- Prescriptions;
- Testing and test outcomes, including: x-rays, psychological evaluations, urine tests, blood tests, CAT scans, etc.;
- Surgical records;
- · Chart notes; and,
- Birth-related records.

A signed Next of Kin Release of Records by Deborah K. Wood is enclosed. To assist you in locating these records, Mrs. Reed's birth date is and her social security number is

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Capital Habeas Unit 10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender

τ.

Phone: (614) 469-299
Toil Free: (877) 217-4835
Fax: (614) 469-5999

AUTHORIZATION FOR NEXT OF KIN RELEASE OF RECORDS

1. Deborate V	vood (DOB:	Social	Security	Number:
	ext of kin to N	ece-Linda	2 Reed DOE	3: _	<u> </u>
DOD: <u>9-19-02</u> , Soci	al Security Numb	er:	herel	by declare	:
, l I release ∠for	inspection and	nhotoconving s	nv and all	records	reparding
Linda Relation	to any emplo	oyee or designated	agent of the C	apital Ha	beas Unit,
Federal Public Defender, 10				_	

- 2. This authorization includes but is not limited to records normally considered privileged and confidential, including but not limited to any and all of the following: employment records: Social Security records: financial records, including IRS tax returns; social service agency records; school records, including but not limited to teacher evaluations, grades, raw test data, evaluations of raw test data, intelligence testing records, counseling records, and health records: juvenile court records: foster care records: military records: prison, jail, and other federal, state, or local incarceration records: criminal case records, including but not limited to attorney and investigation files: court records: FBI and other federal, state, or local law enforcement records: medical records: psychotherapy records: birth or death certificates.
- 3. In authorizing this disclosure I explicitly waive any and all rights I may have to the confidential maintenance of these records, including any such rights that exist under local, state, and federal statutory and/or constitutional law, rule or order.
- 4. This authorization and release shall remain valid and in effect until such time as I expressly revoke this consent.
 - 5. A photocopy of this release shall be the same as the original.
- 6. I understand that I can change my mind and revoke this authorization in writing at any time by sending a signed and dated written statement to the Capital Habeas Unit, stating that I am revoking my authorization, except to the extent that the person(s) and/or organization(s) named above have already taken action in reliance on this authorization.



Medical Records Attached

TO: Nikki Spears

ORGANIZATION: OH Office Of The Federal Public Defender

FAX NUMBER: 16144695999

DATE / TIME: 04/21/2018 10:18:AM

SUBJECT: LINDA REED(#21341162)

FROM: Mercy Health Partners

RETURN FAX: (610) 962-8421

COMPANY: MRO Corporation

CONTACT EMAIL: roihelp@mrocorp.com

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material.

Any review, transmission, dissemination or other use of or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited.

If you have received this in error, please contact MRO at (888)252-4146, and destroy the material.



Date: 4/19/18

Attention: OFFICE OF THE FEDERAL PUBLIC DEFENDER OFFICE OF THE FEDERAL PUBLIC DEFENDER 250 E. 5TH STE STE 350 CINCINNATI, OH 45202

From: THE JEWISH HOSPITAL

We have received your request for information regarding the above-named patient. Unfortunately, we are unable to process the request due to the following reason(s):

NO RECORDS

Please return this response with request and required documentation to:

Patient: Linda Reed Release ID: 181638850

THE JEWISH HOSPITAL 4777 E. Galbraith Road Cincinnati, Ohio 45236

513-686-3629

Capital Habeas Unit
10 West Broad Street, Suite 1020
Columbus, OH 43215

Deborah L. Williams Federal Public Defender Phone: (614)469-2999
Toll Free: (877)217-4835
Fax: (614)469-5999

APR 19 2018

April 5, 2018

Mercy Health Jewish Hospital 4777 E. Galbraith Rd. Cincinnati, Ohio 45236

Re: Records Request for patient Linda Reed

To Whom It May Concern:

Please be advised that our office is in need of medical records for patient Linda Reed; therefore, I am writing to request any and all medical records for the deceased, Mrs. Reed, including, but not limited to:

- Admission and release dates;
- Presenting problems, diagnoses, treatment plans and attending physicians' names;
- Prescriptions;

HATTER TO THE WAY AND

- Testing and test outcomes, including: x-rays, psychological evaluations, urine tests, blood tests, CAT scans, etc.;
- Surgical records;
- · Chart notes; and,
- Birth-related records.

A signed Next of Kin Release of Records by Deborah K. Wood is enclosed. To assist you in locating these records, Mrs. Reed's birth date is and her social security number is

In addition to our above records request, please indicate the name of your agency's custodian of records, as it may be necessary to have the authenticity of the documents verified. Also, please certify the records as a complete and accurate copy of the originals. If, due to hospital policy, any of the medical records no longer exists, please provide a copy of such policy with your response.

Page 2 of 2

Thank you very much for your assistance in this matter. If you have any questions or concerns regarding these requests, please do not hesitate to contact me at the number or email below.

Sincerely,

Nikki Spears

Capital Habeas Unit Paralegal

nikki.spears@fd.org

614-469-4126

Enclosure



Medical Records Attached

TO: Nikki Spears

ORGANIZATION: OH Office Of The Federal Public Defender

FAX NUMBER: 16144695999

DATE / TIME: 04/21/2018 02:03:PM

SUBJECT: LINDA REED(#21350910)

FROM: Mercy Health Partners

RETURN FAX: (610) 962-8421

COMPANY: MRO Corporation

CONTACT EMAIL: roihelp@mrocorp.com

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material.

Any review, transmission, dissemination or other use of or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited.

If you have received this in error, please contact MRO at (888)252-4146, and destroy the material.

Certification of Medical Records Custodian

NO RECORDS STATEMENT

I, the undersigned, being the duly authorized medical records custodian or other qualified witness declare the following: A thorough search of our files, carried out under my direction revealed no documents, records or other materials called for in the request for medical records identified below.

Request for medical records for:

LINDA REED

Patient Name

06/14/1940

Patient date of birth or social security number

Records requested by:

OFFICE OF THE FEDERAL PUBLIC DEFENDER

SOUTHERN DISTRICT OF OHIO

Name of requesting party or organization

Date of request:

04/19/2018

Date of request

I DECLARE, UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND CORRECT.

Signed On:

April 19, 2018

Date

Signature:

Character 2

Name:

ANNA G. LAFFERTY

Print name

Mercy Hospital Clermont

3000 Hospital Drive Batavia, OH 45103

Capital Habeas Unit

10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

April 5, 2018

Mercy Health Clermont Hospital 3000 Hospital Dr. Batavia, Ohio 45103

Re: Records Request for patient Linda Reed

To Whom It May Concern:

Please be advised that our office is in need of medical records for patient Linda Reed; therefore, I am writing to request any and all medical records for the deceased, Mrs. Reed, including, but not limited to:

- Admission and release dates;
- Presenting problems, diagnoses, treatment plans and attending physicians' names;
- Prescriptions;
- Testing and test outcomes, including: x-rays, psychological evaluations, urine tests, blood tests, CAT scans, etc.;
- Surgical records;
- · Chart notes; and,
- Birth-related records.

A signed Next of Kin Release of Records by Deborah K. Wood is enclosed. To assist you in locating these records, Mrs. Reed's birth date is and her social security number is

In addition to our above records request, please indicate the name of your agency's custodian of records, as it may be necessary to have the authenticity of the documents verified. Also, please certify the records as a complete and accurate copy of the originals. If, due to hospital policy, any of the medical records no longer exists, please provide a copy of such policy with your response.

Page 2 of 2

Thank you very much for your assistance in this matter. If you have any questions or concerns regarding these requests, please do not hesitate to contact me at the number or email below.

Sincerely,

Nikki Spears

Capital Habeas Unit Paralegal

nikki.spears@fd.org

614-469-4126

Enclosure

Capital Habeas Unit 10 West Broad Street, Suite 1020

Columbus, OH 43215

Deborah L. Williams Federal Public Defender

Phone: (614) 469-299 Toll Free: (877) 217-4835 Fax: (614) 469-5999

AUTHORIZATION FOR NEXT OF KIN RELEASE OF RECORDS

1. Deborate L	Nood (DOB:	Social	Security	Number:
). a n	ext of kin to <u>M</u>	ece-Lina	1 Reed(DO)	3:	
DOD: 9-19-02. Soc	ial Security Numb	per: [here	by declare	;
1. L release Aor	inspection and	photocopying	any and all	records	recardino
Linda Reco	to any emplo	ay ce or designate	d agent of the C	'apital Ha	beas Unit.
Federal Public Defender, 1					

- 2. This authorization includes but is not limited to records normally considered privileged and confidential, including but not limited to any and all of the following: employment records: Social Security records: financial records, including IRS tax returns: social service agency records: school records, including but not limited to teacher evaluations, grades, raw test data, evaluations of raw test data, intelligence testing records, counseling records, and health records; juvenile court records: foster care records: military records: prison, jail, and other federal, state, or local incurrecation records: criminal case records, including but not limited to attorney and investigation files: court records: FBI and other federal, state, or local law enforcement records; medical records: psychotherapy records: birth or death certificates.
- 3. In authorizing this disclosure I explicitly waive any and all rights I may have to the confidential maintenance of these records, including any such rights that exist under local, state, and federal statutory and or constitutional law, rule or order.
- 4. This authorization and release shall remain valid and in effect until such time as 1 expressly revoke this consent.
 - 5. A photocopy of this release shall be the same as the original.
- 6. I understand that I can change my mind and revoke this authorization in writing at any time by sending a signed and dated written statement to the Capital Habeas Unit, stating that I am revoking my authorization, except to the extent that the person(s) and/or organization(s) named above have already taken action in reliance on this authorization.

- 7. Any and all previous authorizations for release of the above identified records signed or otherwise made by me are hereby revoked.
- 8. I have had ample opportunity to read and consider the content of this authorization. I affirm that the contents of this authorization are consistent with my direction.
- 9. I am signing this authorization voluntarily and of my own free will. I understand that I can refuse to sign this authorization.

Date: 3/21/18

Deborale KWood



Medical Records Attached

TO: Nikki Spears

ORGANIZATION: OH Office Of The Federal Public Defender

FAX NUMBER: 16144695999

DATE / TIME: 04/21/2018 02:03:PM

SUBJECT: LINDA REED(#21350991)

FROM: Mercy Health Partners

RETURN FAX: (610) 962-8421

COMPANY: MRO Corporation

CONTACT EMAIL: roihelp@mrocorp.com

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material.

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Certification of Medical Records Custodian

NO RECORDS STATEMENT

I, the undersigned, being the duly authorized medical records custodian or other qualified witness declare the following: A thorough search of our files, carried out under my direction revealed no documents, records or other materials called for in the request for medical records identified below.

Request for medical records for: LINDA REED

Patient Name

06/14/1940

Patient date of birth or social security number

Records requested by:

OFFICE OF THE FEDERAL PUBLIC

DEFENDER

SOUTHERN DISTRICT OF OHIO

Name of requesting party or organization

Date of request:

04/19/2018

Date of request

I DECLARE, UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND CORRECT.

Signed On:

April 19, 2018

Date

Signature:

Ciomotura

Name:

ANNA G. LAFFERTY

Print name

Mercy Hospital Anderson 7500 State Road Cincinnati, OH 45255

Capital Habeas Unit 10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

April 5, 2018

Mercy Health Anderson Hospital 7500 State Rd. Cincinnati, Ohio 45255

Re: Records Request for patient Linda Reed

To Whom It May Concern:

Please be advised that our office is in need of medical records for patient Linda Reed; therefore, I am writing to request any and all medical records for the deceased, Mrs. Reed, including, but not limited to:

- · Admission and release dates;
- Presenting problems, diagnoses, treatment plans and attending physicians' names;
- Prescriptions;
- Testing and test outcomes, including: x-rays, psychological evaluations, urine tests, blood tests, CAT scans, etc.;
- · Surgical records;
- · Chart notes; and,
- Birth-related records.

A signed Next of Kin Release of Records by Deborah K. Wood is enclosed. To assist you in locating these records, Mrs. Reed's birth date is and her social security number is

In addition to our above records request, please indicate the name of your agency's custodian of records, as it may be necessary to have the authenticity of the documents verified. Also, please certify the records as a complete and accurate copy of the originals. If, due to hospital policy, any of the medical records no longer exists, please provide a copy of such policy with your response.

Page 2 of 2

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Sincerely,

Nikki Spears

Capital Habeas Unit Paralegal

nikki.spears@fd.org 614-469-4126

Enclosure

Capital Habeas Unit

10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender

Phone: (614) 469-299 Toll Free: (877) 217-4835 Fax: (614) 469-5999

AUTHORIZATION FOR NEXT OF KIN RELEASE OF RECORDS

1. Deborate L	Wood (D	OB:	Social	Security	Number:
, a n	ext of kin to <u>Nie</u>	ce-Linda	ReedIDOE	3:	
DOD: 9-19-02 Soc	ial Security Number	**	herel	oy declare	
, 1., I release for	inspection and p	photocopying an	y and all	records	regarding
LINDA RUECE	to any employ	ee or designated ag	gent of the C	apital Ha	beas Unit,
Federal Public Defender, 1	0 West Broad Stre	et, Suite 1020, Co	olumbus, O	H, 43215	

- 2. This authorization includes but is not limited to records normally considered privileged and confidential, including but not limited to any and all of the following: employment records: Social Security records: financial records, including IRS tax returns: social service agency records; school records, including but not limited to teacher evaluations, grades, raw test data, evaluations of raw test data, intelligence testing records, counseling records, and health records; juvenile court records: foster care records: military records: prison, jail, and other federal, state, or local incarceration records; criminal case records, including but not limited to attorney and investigation files: court records: FBI and other federal, state, or local law enforcement records: medical records: psychotherapy records: birth or death certificates.
- 3. In authorizing this disclosure I explicitly waive any and all rights I may have to the confidential maintenance of these records, including any such rights that exist under local, state, and federal statutory and/or constitutional law, rule or order.
- 4. This authorization and release shall remain valid and in effect until such time as I expressly revoke this consent.
 - 5. A photocopy of this release shall be the same as the original.
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- 8. I have had ample opportunity to read and consider the content of this authorization. I affirm that the contents of this authorization are consistent with my direction.
- 9. I am signing this authorization voluntarily and of my own free will. Lunderstand that I can refuse to sign this authorization.

Date: 3/21/18

Deboral KWood



Date: 4/12/2018

To Whom It May Concern:

Regarding: Medical Records requested for

patient Linda Reed was 11/30/1998, DOB 6/14/40

The requested records on the above patient are no longer available. TriHealth keeps non-maternity records for ten years before they are destroyed. Maternity records are destroyed after twenty-one years

Thank your for your inquiry.

If we can be of further assistance, please feel free to call.

Medical Records Department

513-865-1488



APR 1 2 2018

Capital Habeas Unit 10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender

Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

April 5, 2018

Bethesda North Hospital 10500 Montgomery Rd. Cincinnati, Ohio 45242-4402

Re: Records Request for patient Linda Reed

To Whom It May Concern:

Please be advised that our office is in need of medical records for patient Linda Reed; therefore, I am writing to request any and all medical records for the deceased, Mrs. Reed, including, but not limited to:

- Admission and release dates;
- Presenting problems, diagnoses, treatment plans and attending physicians' names;
- Prescriptions;
- Testing and test outcomes, including: x-rays, psychological evaluations, urine tests, blood tests, CAT scans, etc.;
- Surgical records;
- Chart notes; and,
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Sincerely,

Nikki Spears

Capital Habeas Unit Paralegal

nikki.spears@fd.org

614-469-4126

Enclosure

Columbus, OH 43215

Capital Habeas Unit 10 West Broad Street, Suite 1020

Deborah L. Williams Federal Public Defender

Phone: (614) 469-299 Toll Free: (877) 217-4835

Fax: (614) 469-5999

AUTHORIZATION FOR NEXT OF KIN RELEASE OF RECORDS

Deboralt Wood (DOB:	Social Se <u>curity N</u> umber:
Deboralt Wood (DOB: DOD: 9-19-02, Social Security Number:	eed (DOB:,
1. I release for inspection and photocopying any to any employee or designated age	and all records regarding it of the Capital Habeas Unit,
Federal Public Defender, 10 West Broad Street, Suite 1020, Colo	umbus, OH, 43215.

- 2. This authorization includes but is not limited to records normally considered privileged and confidential, including but not limited to any and all of the following: employment records; Social Security records; financial records, including IRS tax returns; social service agency records; school records, including but not limited to teacher evaluations, grades, raw test data, evaluations of raw test data, intelligence testing records, counseling records, and health records; juvenile court records; foster care records; military records; prison, jail, and other federal, state, or local incarceration records; criminal case records, including but not limited to attorney and investigation files: court records; FBI and other federal, state, or local law enforcement records; medical records; psychotherapy records; birth or death certificates.
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- 4. This authorization and release shall remain valid and in effect until such time as I expressly revoke this consent.
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9. I am signing this authorization voluntarily and of my own free will. I understand that I can refuse to sign this authorization.

Deboral KWood

Date: 3/21/18

Microfiched Information by Control Number

JMS	Control	Name	Admitted	Released	Microfiched
Number	Number		Date	Date	Date
335071	411591	REED, LINDA, J	10/28/1995	11/28/1995	8/26/1999

Run Date

10/5/2018 @ 10:33:08 AM

Page 1 [FICHECTL]

Microfiched Information by Control Number

JMS	Control	Name	Admitted	Released	Microfiched
Number	Number		Date	Date	Date
335922	1949057	SUGGS, DELORES, M	11/6/1995	11/17/1995	8/26/1999





Office of the Federal Public Defender Southern District of Ohio - Eastern Division

10 West Broad Street, Suite 1020, Columbus, Ohio 43215 Telephone: (614) 469-2999 Fax: (614) 469-5999

Facsimile Transmission

Date:	October 11, 2018			
То:	Jail Records			
At:	Hamilton County Sherlff's Office			
Facsimile Number:	513-946- 6 313			
Regarding:	Jall Housing Records Request			
From;	Erin Gallagher Barnhart, Assistant Federal Public Defender			
Number of Pages:	2 (Including Cover)			
Comments: Thank you.	Please see attached request on official letterhead.			

CONFIDENTIALITY NOTICE: This cover sheet, and any documents which may accompany it, contains information that is solely for the use of the individual or entity to which it is addressed, and may contain information that is legally privileged and/or contidential. Unauthorized disclosure of this information is prohibited. If you have received this communication in error, please call us collect immediately to arrange for the destruction of the communication or its return to us at our expense. Thank you.

OFFICE OF THE FEDERAL PUBLIC DEFENDER SOUTHERN DISTRICT OF OHIO

Capital Habeas Unit 10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender

Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

P. 2/9 2/2

Erin Gallagher Barnhart, Assistant Federal Public Defender erin_barnhart@fd.org

October 11, 2018

Hamilton County Sheriff's Office Jail Records

Sent via fax: (513) 946-6313

To Whom It May Concern:

Per my conversation with Aleigha today, I request records of all dates of incarceration for the following people:

- Linda Reed, Control Number 411591 No Records
- Linda Clark, Control Number 903386 VVV
- Delores Suggs, Control Number 1949057

Thank you in advance for your assistance in this matter. If you have any questions or require any more information regarding this request, please contact me at coingle unhance design or 614-469-4125.

Sincerely,

Erin Barnhart

Assistant Federal Public Defender



JUSTICE CENTER
ROOM 110
1000 SYCAMORE STREET
CINCINNATI, OHIO 45202-1336
(513) 946-6400
FAX: (513) 946-6402



DATE: 10/12/18

TO WHOM IT MAY CONCERN:

THIS LETTER WILL VERIFY THAT LINDA CLARK,

JMS NUMBER 1052445 ADMITTED TO THE HAMILTON COUNTY,

JUSTICE CENTER, 1000 SYCAMORE STREET, CINCINNATI, OHIO 45202,

ON 04/13/03 () WILL BE OR (X) WAS RELEASED FROM THE

JUSTICE CENTER ON 04/29/03.

THERE ARE ANY FURTHER QUESTIONS, PLEASE FEEL FREE TO CONTACT THE JUSTICE CENTER RECORDS OFFICE AT 946-6300 #4

HAMILTON COUNTY JUSTICE CENTER

RECORDS OFFICE

BY:

DATE: 10/12/18

MAJOR WILLIAM RARRICK

ENFORCEMENT DIVISION ORGANIZED CRIME DIVISION/RENU
PHONE: \$25-1500 PHONE: 352-3673
FAX: 595-8517 FAX: 352-4828

STEPHEN LAWSON & KEVIN DINKELACKER SHERIFF'S COUNSEL PHONE: 946-6400 FAX: 946-6402

MAJOR MICHAEL HARTZLER
DIRECTOR-GREATER CINCINNATI FUSION CENTER
PHONE: 263-8227
FAX: 263-8001

MAJOR WALTER HENDRICK COURT SERVICES DIVISION PHONE: 946-5320 FAX: 946-5321

JIM KNAPP CHIEF COMPLIANCE AUDITOR PHONE: 946-6400 FAX: 946-6402



JUSTICE CENTER ROOM 110 1000 SYCAMORE STREET CINCINNATI, OHIO 45202-1336 (513) 946-6400 FAX: (513) 946-6402

DATE: 10/12/18

TO WHOM IT MAY CONCERN:

THIS LETTER WILL VERIFY THAT LINDA CLARK,

JMS NUMBER 909144 ADMITTED TO THE HAMILTON COUNTY,

JUSTICE CENTER, 1000 SYCAMORE STREET, CINCINNATI, OHIO 45202,

ON 2/20/2000 () WILL BE OR (X) WAS RELEASED FROM THE

JUSTICE CENTER ON 2/22/2000.

THERE ARE ANY FURTHER QUESTIONS, PLEASE FEEL FREE TO CONTACT THE JUSTICE CENTER RECORDS OFFICE AT 946-6300 #4

HAMILTON COUNTY JUSTICE CENTER

RECORDS ØFFIC

BY:

DATE: 10/12/18

MAJOR CHRIS KETTEMAN JAIL SERVICES DIVISION PHONE: 946-6600 FAX: 946-6615

> KEVIN HORN SHZRIFF'S FISCAL OFFICER PHONE: 946-6407 FAX: 946-6616

MAJOR EARL PRICE TRAINING SECTION PHONE: 825-1500 FAX: 595-3517 MAJOR WILLIAM RARRICK

ENFORCEMENT DIVISION ORGANIZED CRIME DIVISION/RENU
PHONE: 825-1500 Phone: 352-3673
FAX: 595-8517 FAX: 352-4828

STEPHEN LAWSON & KEVIN DINKELACKER SHERIFF'S COUNSEL PHONE: 946-6400 FAX: 946-6402

MAJOR MICHAEL HARTZLER DIRECTOR-GREATER CINCINNATI FUSION CENTER PHONE: 263-8227 FAX: 263-8001 MAJOR WALTER HENDRICK COURT SERVICES DIVISION PHONE: 946-5320 FAX: 946-5321

JIM KNAPP CHIEF COMPLIANCE AUDITOR PHONE: 946-6400 FAX: 946-6402



JUSTICE CENTER **ROOM 110** 1000 SYCAMORE STREET CINCINNATI, OHIO 45202-1336 (513) 946-6400 FAX: (513) 946-6402

DATE: 10/12/18

TO WHOM IT MAY CONCERN:

THIS LETTER WILL VERIFY THAT LINDA CLARK. JMS NUMBER 908087 ADMITTED TO THE HAMILTON COUNTY, JUSTICE CENTER, 1000 SYCAMORE STREET, CINCINNATI, OHIO 45202, ON 2/12/2000 (

) WILL BE OR (X) WAS RELEASED FROM THE JUSTICE CENTER ON 2/14/2000.

THERE ARE ANY FURTHER QUESTIONS, PLEASE FEEL FREE TO CONTACT-THE JUSTICE CENTER RECORDS OFFICE AT 946-6300 #4

HAMILTON COUNTY JUSTICE CENTER

RECORDS OFFICE

BY:

DATE: 10/12/18

MAJOR CHRIS KETTEMAN JAIL SERVICES DIVISION PHONE: 946-6600 FAX: 946-6616

> KEVIN HORN SHERIFF'S FISCAL OFFICER PHONE: 946-6407 FAX: 946-6616

MAJOR EARL PRICE TRAINING SECTION PHONE: 825-1500 Fax: 595-8517

MAJOR WILLIAM RARRICK

PHONE: 825-1500 Fax: 595-8517

ENFORCEMENT DIVISION ORGANIZED CRIME DIVISION/RENU PHONE: 352-3673 FAX: 352-4828

STEPHEN LAWSON & KEVIN DINKELACKER SHERIFF'S COUNSEL

PHONE: 946-6400 Fax: 946-6402

MAJOR MICHAEL HARTZLER DIRECTOR-GREATER CINCINNATI FUSION CENTER PHONE: 263-8227 FAX: 263-8001

MAJOR WALTER HENDRICK COURT SERVICES DIVISION PHONE: 946-5320 Fax: 946-5321

JIM KNAPP CHIEF COMPLIANCE AUDITOR PHONE: 946-6400 FAX: 946-6402





JUSTICE CENTER **ROOM 110** 1000 SYCAMORE STREET CINCINNATI, OHIO 45202-1336 (513) 946-6400 FAX: (513) 946-6402

DATE: 10/12/18

TO WHOM IT MAY CONCERN:

THIS LETTER WILL VERIFY THAT DELORES SUGGS, JMS NUMBER 1417710 ADMITTED TO THE HAMILTON COUNTY, JUSTICE CENTER, 1000 SYCAMORE STREET, CINCINNATI, OHIO 45202,) WILL BE OR (X) WAS RELEASED FROM THE ON 02/02/11 (JUSTICE CENTER ON 02/02/11.

THERE ARE ANY FURTHER QUESTIONS, PLEASE FEEL FREE TO CONTACT THE JUSTICE CENTER RECORDS OFFICE AT 946-6300 #4

HAMILTON COUNTY JUSTICE CENTER

RECORDS OFFICE

DATE: 10/12/18

BY:

MAJOR CHRIS KETTEMAN JAIL SERVICES DIVISION PHONE: 946-6600 FAX: 946-6616

> KEVIN HORN SHERIFF'S FISCAL OFFICER PHONE: 946-6407 FAX: 946-6616

MAJOR EARL PRICE Training Section PHONE: 825-1500 FAX: 595-8517

MAJOR WILLIAM RARRICK

PHONE: 825-1500 Fax: 595-8517

ENFORCEMENT DIVISION ORGANIZED CRIME DIVISION/RENU PHONE: 352-3673 FAX: 352-4828

STEPHEN LAWSON & KEVIN DINKELACKER SHERIFF'S COUNSEL

PHQN€: 946-6400 Fax: 946-6402

MAJOR MICHAEL HARTZLER DIRECTOR-GREATER CINCINNATI FUSION CENTER PHONE: 263-8227 FAX: 263-8001

MAJOR WALTER HENDRICK COURT SERVICES DIVISION PHONE: 946-5320 FAX: 946-5321

JIM KNAPP CHIEF COMPLIANCE AUDITOR PHONE: 946-6400 Fax: 946-6402





JUSTICE CENTER
ROOM 110
1000 SYCAMORE STREET
CINCINNATI, OHIO 45202-1336
(513) 946-6400
FAX: (513) 946-6402

DATE: 10/12/18

TO WHOM IT MAY CONCERN:

THIS LETTER WILL VERIFY THAT <u>DELORES SUGGS</u>,

JMS NUMBER <u>1074345</u> ADMITTED TO THE HAMILTON COUNTY,

JUSTICE CENTER, 1000 SYCAMORE STREET, CINCINNATI, OHIO 45202,

ON <u>10/12/03</u> () WILL BE OR (X) WAS RELEASED FROM THE

JUSTICE CENTER ON <u>10/14/03</u>.

THERE ARE ANY FURTHER QUESTIONS, PLEASE FEEL FREE TO CONTACT THE JUSTICE CENTER RECORDS OFFICE AT 946-6300 #4

HAMILTON COUNTY JUSTICE CENTER RECORDS OFFICE

BY:

DATE: 10/12/18

MAJOR CHRIS KETTEMAN JAIL SERVICES DIVISION PHONE: 945-6600 FAX: 946-6616

> KEVIN HORN SHERIFF'S FISCAL OFFICER PHONE: 946-6407 FAX: 946-6616

MAJOR EARL PRICE TRAINING SECTION PHONE: 825-1500 FAX: 595-8517 MAJOR WILLIAM RARRICK

ENFORCEMENT DIVISION ORGANIZED CRIME DIVISION/RENU
PHONE: 825-1500 PHONE: 352-3673
FAX: 595-8517 FAX: 352-4828

STEPHEN LAWSON & KEVIN DINKELACKER SHERIFF'S COUNSEL

SHERIFF'S COUNSE PHONE: 946-6400 FAX: 946-6402

MAJOR MICHAEL HARTZLER
DIRECTOR-GREATER GINGINNATI FUSION CENTER
PHONE: 263-8227
FAX: 263-8001

MAJOR WALTER HENDRICK COURT SERVICES DIVISION PHONE: 946-5320 FAX: 946-5321

JIM KNAPP CHIEF COMPLIANCE AUDITOR PHONE: 946-6400 FAX; 946-6402





JUSTICE CENTER **ROOM 110** 1000 SYCAMORE STREET CINCINNATI, OHIO 45202-1336 (513) 946-6400 FAX: (513) 946-6402

DATE: 10/12/18

TO WHOM IT MAY CONCERN:

THIS LETTER WILL VERIFY THAT DELORES SUGGS. JMS NUMBER 890209 ADMITTED TO THE HAMILTON COUNTY, JUSTICE CENTER, 1000 SYCAMORE STREET, CINCINNATI, OHIO 45202,) WILL BE OR (X) WAS RELEASED FROM THE ON 10/06/99 (

JUSTICE CENTER ON 10/07/99.

THERE ARE ANY FURTHER QUESTIONS, PLEASE FEEL FREE TO CONTACT THE JUSTICE CENTER RECORDS OFFICE AT 946-6300 #4

HAMILTON COUNTY JUSTICE CENTER

RECORDS OFFICE

BY:

DATE: 10/12/18

MAJOR CHRIS KETTEMAN JAIL SERVICES DIVISION

> KEVIN HORN SHERIFF'S FISCAL OFFICER PHONE: 946-6407 Fax: 946-6616

MAJOR EARL PRICE TRAINING SECTION PHONE: 825-1500 FAX: 595-8517

PHONE: 946-6600

FAX: 946-6616

MAJOR WILLIAM RARRICK

PHONE: \$25-1500 FAX: 595-8517

ENFORCEMENT DIVISION ORGANIZED CRIME DIVISION/RENU PHONE: 352-3673 FAX: 352-4828

STEPHEN LAWSON & KEVIN DINKELACKER SHERIFF'S COUNSEL PHONE: 946-6400 FAX: 946-6402

MAJOR MICHAEL HARTZLER DIRECTOR-GREATER CINCINNATI FUSION CENTER PHONE: 263-8227 FAY: 263-8001

MAJOR WALTER HENDRICK COURT SERVICES DIVISION PHONE: 946-5320 Fax: 946-6321

JIM KNAPP CHIEF COMPLIANCE AUDITOR PHONE: 946-6400 FAX: 946-6402

> DAVID DAUGHERTY Public Information Officer PHONE: 946-6439 FAX: 946-6616

NO. 306



JIM NEIL SHERIFF HAMILTON COUNTY, OHIO

JUSTICE CENTER ROOM 110 1000 SYCAMORE STREET CINCINNATI, OHIO 45202-1336 (513) 946-6400 FAX: (513) 946-6402



DATE: 10/12/18

TO WHOM IT MAY CONCERN:

THIS LETTER WILL VERIFY THAT DELORES SUGGS,

JMS NUMBER 882610 ADMITTED TO THE HAMILTON COUNTY,

JUSTICE CENTER, 1000 SYCAMORE STREET, CINCINNATI, OHIO 45202,

 \bigcirc) WILL BE OR (X) WAS RELEASED FROM THE

JUSTICE CENTER ON 09/06/99.

THERE ARE ANY FURTHER QUESTIONS, PLEASE FEEL FREE TO

CONTACT THE JUSTICE CENTER RECORDS OFFICE AT 946-6300 #4

HAMILTON COUNTY JUSTICE CENTER

RECORDS OFFICE

BY:

DATE: 10/12/18

MAJOR CHRIS KETTEMAN JAIL SERVICES DIVISION PHONE: 946-6600 FAX: 946-6616

KEVIN HORN SHERIFF'S FISCAL OFFICER PHONE: 946-6407 FAX: 946-6616

MAJOR EARL PRICE TRAINING SECTION PHONE: 825-1500 FAX: 595-8517

MAJOR WILLIAM RARRICK

ENFORCEMENT DIVISION ORGANIZED CRIME DIVISION/RENU PHONE: 352-3673 PHONE: \$25-1500 FAX: 352-4828 Fax: 595-8517

STEPHEN LAWSON & KEVIN DINKELACKER

SHERIFF'S COUNSEL PHONE: 946-6400 FAX: 946-6402

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JIM KNAPP CHIEF COMPLIANCE AUDITOR PHONE: 946-6400 FAX: 946-6402

OFFICE OF THE FEDERAL PUBLIC DEFENDER SOUTHERN DISTRICT OF OHIO

Capital Habeas Unit

10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

February 3, 2017

3705 Woodford Road Apt 1 Cincinnati, OH 45213

To Whom It May Concern,

We are attempting to locate a Mr. James Wilson who resided several years ago at:

3705 Woodford Road Cincinnati, OH

We believe that he may have some information that would aide us in a case we are reviewing. If you know Mr. Wilson or his family I would greatly appreciate a phone call. Or, feel free to pass my phone number on to him. My cell phone is listed below as well as a toll-free number. If you do not get an answer please leave a detailed message that you are returning a call after receiving this letter with your contact information.

Thank you in advance for any help,

Mackenzie Breeding Investigator Capital Habeas Unit Phone) 614-469-4129 Cell) 423-202-0803 Toll-Free) 877 217-4835
 From:
 Brent Long

 To:
 Tane Dorsey

 Subject:
 RE: Deacon

Date: Monday, February 12, 2018 3:06:00 PM

Tané, I would be happy to dig into our paper records to find the last contact information we had on file for him. To protect our church, could you please send me a subpoena for the information. Thank you!

From: Tane Dorsey [mailto:Tane_Dorsey@fd.org]
Sent: Monday, February 12, 2018 1:42 PM

To: Brent Long Subject: Re: Deacon

Thank you for your reply and this information. Do you know his last place of residence or possibly his last telephone contact?

Tané Dorsey Investigator Capital Habeas Unit Federal Public Defender, Southern Ohio 10 W. Broad Street, Suite 1020 Columbus, Ohio 43215 (614)-466-2990

Brent Long ---02/12/2018 01:22:40 PM---We did have a Mr Wilson in our bus ministry but he has been gone for more than 15 years and we do no

From: Brent Long < blong@ourfbc.com > To: Tane Dorsey < Tane_Dorsey@fd.org >

Date: 02/12/2018 01:22 PM Subject: Re: Deacon

We did have a Mr Wilson in our bus ministry but he has been gone for more than 15 years and we do not have his current information in our data base. Sorry we can not be of more help.

On Feb 12, 2018, at 11:57 AM, Tane Dorsey < Tane_Dorsey@fd.org > wrote:

Good Afternoon,

My name is Tané Dorsey. I am reaching out to several churches in the area looking for a Mr. James Wilson. He may have been a Deacon and/or drove for the bus ministry. He picked up children and took them to church on Sundays. Do you recall a man by this name being associated with Friendship Baptist Church?

Thank you for your time

 From:
 Tane Dorsey

 To:
 Brent Long

 Subject:
 Letter to Mr. Wilson

Date: Wednesday, March 7, 2018 7:33:00 AM
Attachments: 2018.03.06 letter to James Wilson EGB edits.docx

Good morning,

I am attaching a letter for Mr. Wilson to be sent to his last known address. Thank you for all of your help in this matter!

(See attached file: 2018.03.06 letter to James Wilson EGB edits.docx)
Tané Dorsey
Investigator
Capital Habeas Unit
Federal Public Defender, Southern Ohio
10 W. Broad Street, Suite 1020
Columbus, Ohio 43215
(614)-466-2990

OFFICE OF THE FEDERAL PUBLIC DEFENDER SOUTHERN DISTRICT OF OHIO

Capital Habeas Unit

10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

March 6, 2018

Delivered to last address on file via Friendship Baptist Church

Dear Mr. Wilson,

My name is Tané Dorsey. I am an Investigator with the Federal Public Defender's office located in Columbus, Ohio. I am writing to you because I believe you used to transport parishioners for the Friendship Baptist Church in Cincinnati. While the church was not able to provide us with your contact information out of respect for your privacy, Pastor Brent Long agreed to send this letter to you at the last address the church has on file in the hopes it would reach you and you would be willing to give our office a call.

We were contacted by a woman named Delores Suggs with some information about one of our clients, a man on death row with a scheduled execution date. You may remember transporting Ms. Suggs's children to Friendship Baptist Church many years ago. Ms. Suggs recalls speaking with you about a woman she met in the Hamilton County jail who told her the wrong man had been convicted for a murder at a Blue Ash hotel. Ms. Suggs remembers you advising her to call the police with this information.

That wrongfully convicted man is our client, Elwood Jones, and we are still attempting to prove his innocence. We would greatly appreciate it if you could contact our office so we could speak to you briefly about your conversation with Ms. Suggs, which would help our case. I can be reached by telephone at the numbers provided below. If I am not at my desk when you call, please leave a message with your contact information.

Thank you in advance for any help,

Tané Dorsey Investigator Capital Habeas Unit Phone) 614-469-4139 Toll-Free) 877 217-4835

CC: Erin Barnhart, Esq.

OFFICE OF THE FEDERAL PUBLIC DEFENDER SOUTHERN DISTRICT OF OHIO

Capital Habeas Unit

10 West Broad Street, Suite 1020 Columbus, OH 43215

Deborah L. Williams Federal Public Defender Phone: (614)469-2999 Toll Free: (877)217-4835 Fax: (614)469-5999

March 7, 2018

Dorothy Banks 5515 Madison Rd Apt 141C Cincinnati, OH 45227

Dear Ms. Banks:

We are attempting to locate a Mr. James Wilson who resided several years ago at: 3705 Woodford Road Cincinnati, OH. I am sending this letter to you because it appears you lived in the same apartment complex during the time Mr. Wilson lived there.

We believe that he may have some information that would aide us in a case we are reviewing. If you know Mr. Wilson or his family I would greatly appreciate a phone call. Or, feel free to pass my phone number on to him. My office phone is listed below as well as a toll-free number. If you do not get an answer please leave a detailed message that you are returning a call after receiving this letter with your contact information.

Thank you in advance for any help,

Tané Dorsey Investigator Capital Habeas Unit Phone) 614-469-4139 Toll-Free) 877 217-4835

CC: Erin Barnhart, Esq.

IN THE HAMILTON COUNTY COURT OF COMMON PLEAS HAMILTON COUNTY, OHIO

STATE OF OHIO, : Case No. B 9508578

:

Plaintiff, : Judge Cooper

:

v. :

:

ELWOOD JONES,

:

Defendant. :

AFFIDAVIT OF DELORES SUGGS

Comes now the undersigned who makes the following statement, under oath, and before the undersigned Notary Public who is authorized by law to hear and accept oaths, and based upon her own personal knowledge of the facts averred herein states as follows:

- 1. My name is Delores Suggs. I am 49 years old. I live in Cincinnati, Ohio.
- 2. In the 1990s, I was jailed in the Hamilton County Justice Center with a woman named Linda Reed. Linda was a short, stubby, heavy-set white woman in her 50's or 60's.
- 3. I believe that the document attached to this affidavit as Exhibit 1, showing I was in the jail from November 6, 1995 through November 17, 1995, reflects the incarceration during which I met Linda Reed.
- 4. While we were in the jail, Linda Reed told me that that her husband was responsible for the murder of a woman at the Embassy Suites in Blue Ash, Ohio. She said that the black man they had locked up for the murder had been framed.
- 5. I asked Linda Reed why she did not contact the police and she told me she had not because her husband was friends with Blue Ash police officers and that he was not worried about getting in trouble for the murder for that reason. She said her husband would sit with the police and have coffee with him.
- 6. Linda Reed told me she was in jail for menacing. She said that her husband wanted her locked up because he was trying to get the deed to the house.
- 7. Linda Reed and I had this conversation sitting next to each other on seats in front of a television. She spoke in a low tone to me and I believed that she was both sincere and scared.

- 8. Linda Reed gave me her phone number and address. This information was written on a piece of paper. I do not have the paper anymore, but I remember that the address she gave me was on Pfeiffer Road in Blue Ash, Ohio.
- 9. When I got out of jail, I tried to call Linda at the number she had given me, but her husband answered the phone and I hung up. When I tried to call her again later, I couldn't get through. I think the number was disconnected.
- 10. Sometime after that, I moved to a home in the Pleasant Ridge neighborhood. There, a man named James Wilson lived near me. I knew him because he was a deacon for a church. He drove a van for the church and would drive my children to the church on Sundays. I am not certain of the name of the church where he worked, but it could be Friendship Baptist Church.
- 11. I told James Wilson what Linda Reed had said to me and asked him what he thought I should do. He said that I should contact the police.
- 12. I used the phone at James Wilson's home to call 911. I was given the phone number to the Blue Ash Police department.
- 13. I then called the Blue Ash Police Department and asked to speak to the person in charge of murder investigations. I was connected to a man. I don't remember his name. I told him what Linda Reed had told me about her husband and the murder. The sergeant was not interested in what I had to say. He told me that they had found stuff in a man's possession and that it was a closed case.
- 14. After that, I did not do anything further about what Linda Reed had told me until years later. While watching a television program in 2016 about someone who was innocent but locked up, I thought about what Linda Reed told me. I told my daughter, Tierra Suggs, about my encounter with Linda Reed and asked her to look up information about the murder.
- 15. My daughter learned that Elwood Jones was convicted for the murder and was currently in prison on death row.
- 16. After learning that, I asked my daughter to send a JPay email to Elwood Jones and tell him what Linda Reed had told me.
- 17. Soon after my daughter contacted Mr. Jones, I met with two people working on his case, investigator Mackenzie Breeding and attorney Jay Clark, at my home.
- 18. I also spoke with members of Mr. Jones's defense team on the phone multiple times after that to answer questions.
- 19. I drove around the neighborhood where I remember James Wilson used to live and sent Mackenzie Breeding the address of what I think was his building at the time I talked to him about Linda Reed.

- 20. In April of 2017, investigator Jessica Ashcraft met with me to show me a picture of a woman to see if she was the Linda Reed I had spoken to in jail. That picture is attached to this affidavit as Exhibit 2. Although this picture was of a white, blond woman, I was certain it was not the woman I met in the jail who told me her name was Linda Reed.
- 21. In February of 2018, investigator Tane Dorsey brought me pictures of a woman I immediately recognized as Linda Reed. Those pictures are attached to this affidavit as Exhibit 3.
- 22. In September of 2018, Tane Dorsey and attorney Erin Barnhart met with me to go over what I had said about Linda Reed so I could sign an affidavit for them.
- 23. Ms. Barnhart explained that she could not find any records of me having been in the jail in the mid-1990s, like I recalled. She showed me the records she had obtained from my cases in 1999, 2003, and 2011. As we reviewed these materials, which included copies of traffic tickets and warrants, I remembered that when I met Linda Reed, I had gone to jail because I needed to pay down tickets and warrants.
- 24. Seeing the records from my later cases helped me remember this. I told Ms. Barnhart that when I was in jail in the mid-1990s and met Linda Reed, there was a system where you could reduce what you owed by about \$30 a day by going to jail. I remembered doing that for a week or so, and eventually deciding I could not take it any longer and asking my boyfriend to pay off the rest of what I owed and get me out. He came and did that on a Friday after he got paid.
- 25. Ms. Barnhart later showed me the document attached to this affidavit as Exhibit 1, which is consistent with my memory of the time I was in the jail with Linda Reed.

Delores Suggs, Affiant

Sworn to and subscribed before

Me this

day of Januce

2015

Notary Public

My commission expires:

BOYSET I CLARK, A DIRECT OF LAW PARTY OF LAW PARTY OF LAW PARTY PARTY OF THE PARTY

Run Date

10/5/2018 @ 10:33:08 AM

Page 1 [FICHECTL]

Microfiched Information by Control Number

JMS Number	Control Number	Name	Admitted Date	Released Date	Microfiched Date	
335922	1949057	SUGGS, DELORES, M	11/6/1995	11/17/1995	8/26/1999	







IN THE HAMILTON COUNTY COURT OF COMMON PLEAS HAMILTON COUNTY, OHIO

STATE OF OHIO, : Case No. B 9508578

:

Plaintiff, : Judge Cooper

:

v. :

:

ELWOOD JONES,

:

Defendant. :

AFFIDAVIT OF DEBORAH WOOD

Comes now the undersigned who makes the following statement, under oath, and before the undersigned Notary Public who is authorized by law to hear and accept oaths, and based upon her own personal knowledge of the facts averred herein states as follows:

- 1. My name is Deborah Wood. I am 66 years old. I live in Fairfield, Ohio.
- 2. I am the niece of Linda Reed, who was born on June 14, 1940, and died on September 19, 2002.
- 3. Linda was married to Earl Reed, who died in 2011.
- 4. Linda and Earl met because Earl rented an apartment on the third floor of my parents' home when I was a teenager.
- 5. Earl was a truck driver.
- 6. Earl always seemed to have a lot of money. He was well dressed, went out to fancy restaurants, and took many vacations, even going to Europe.
- 7. Earl and Linda had one son, Scott Reed.
- 8. Earl had a son from a previous relationship named Terry Reed. Earl would say that Terry Reed's mother had gone to an insane asylum because she was "crazy." I do not know the

- name of Terry Reed's mother, only that they lived together in Akron before Earl left and came to the Cincinnati area and met my aunt.
- 9. I recall my mother saying "Earl makes Linda look bad" and that Earl would call Linda "crazy," just as he had done with the mother of his first son.
- 10. At the end of her life, Linda resided in nursing homes. For much of that time, I was her caretaker. I was appointed her guardian in 1998.
- 11. Linda ended up in a nursing home because Earl took her to the hospital. He left her on a bench outside the hospital and drove off. He called the hospital saying a woman was out there in need of assistance. He later called my mom and told them about this and said if we wanted to see Linda she was at the hospital.
- 12. My mom then called me and asked me to go check on Linda. When I did, Linda did not seem to recognize me and could not talk or really even move.
- 13. Linda was suffering from normal pressure hydrocephalus, which was an abnormal buildup of fluid on her brain.
- 14. Linda's treatment providers kept asking me if she had been in a car wreck. I told them she had not. They told me that her condition could have been brought on only by something like a bad car wreck or bad abuse.
- 15. Eventually, Linda was moved to a nursing home. At first, she was at East Galbraith nursing home and had a lawyer serving as her guardian. After I was appointed her guardian, I moved her to West Chester nursing home.
- 16. Earl Reed would visit Linda in the nursing home and periodically ask me for updates on her condition.
- 17. On two occasions, Linda had shunts placed to drain the built-up fluid off her brain.

- 18. Following the placement of each of these shunts, Linda improved dramatically. She went from relying on a feeding tube and not being able to talk to returning to almost normal functioning.
- 19. When Linda's condition began to deteriorate again some time after getting the second shunt, I learned that her treatment providers determined that they would not be able to place a third shunt because the current shunt had been damaged. I was told that it looked like someone had been hitting her in the head.
- 20. Linda had told me and other members of our family that that Earl was hitting her in the arm and head during his visits with her at the nursing home. Before she got sick, she had also reported abuse by Earl to us, but we had not seen proof of physical violence back then, just verbal abuse. What we learned from her treatment providers seemed to make everything fall into place and show us that Linda had been telling the truth about Earl's abuse of her.
- 21. Because of these reports from Linda, the nursing home staff instructed me to tell Earl he would no longer be permitted to visit Linda, and that if he attempted to do so, he would be arrested. They said that they did not need to be able to prove abuse reported by a patient to tell someone he could not come back on the property. I do not believe they reported this abuse to the police.
- 22. I delivered that message to Earl. He simply responded "ok" to me. I was stunned that he did not seem upset by this news. I repeated myself to make sure he understood what I was telling him—that he would be arrested if he tried to come to the nursing home again because he had been beating Linda—and his response was the same. He did not even deny that he had been harming Linda.

- 23. After Linda died, I stayed in touch with her son Scott for many years. Despite all the signs of Earl's wealth I had observed, when Earl died, I learned from Scott that there was no money left. Scott could not even afford a funeral for Earl and had to donate his body to science at the University of Cincinnati. Scott also lost the family home because his father left no money to him.
- 24. I have since lost contact with Scott. I last spoke to him several years ago. I have tried phone numbers that I used to be able to use to reach Scott but they are no longer in service.
- 25. For many years, I retained paperwork about Linda's treatment from when I was her guardian. I recently threw out those records, however, when I moved during the summer of 2017.
- 26. In March of 2018, I signed a release to allow Elwood Jones's lawyers to obtain Linda's records.
- 27. I would not be surprised if it turned out Earl had killed someone. My entire family all felt something was not right about Earl. He gave off a sneaky vibe and was cagey. My parents did not trust Earl and were not happy when they found out that he was dating my aunt Linda. When we were teenagers and Earl was renting a room at my parents' home, they did not allow my sister or me to be at the house without them if Earl was there.

 They did not trust him alone with us.
- 28. I never met Earl's friends, but it seemed to me like Earl could be friend anyone. My father used to say about Earl, "he could charm the socks off of anyone."

29. Three pictures are attached to this affidavit. The first two photos show my aunt Linda Reed. The last photo shows Earl and Scott Reed and was taken at Linda's funeral in 2002.

Deborah Kulood
Deborah Wood, Affiant

Sworn to and subscribed before

Me this

day of JANUCE

, 2018

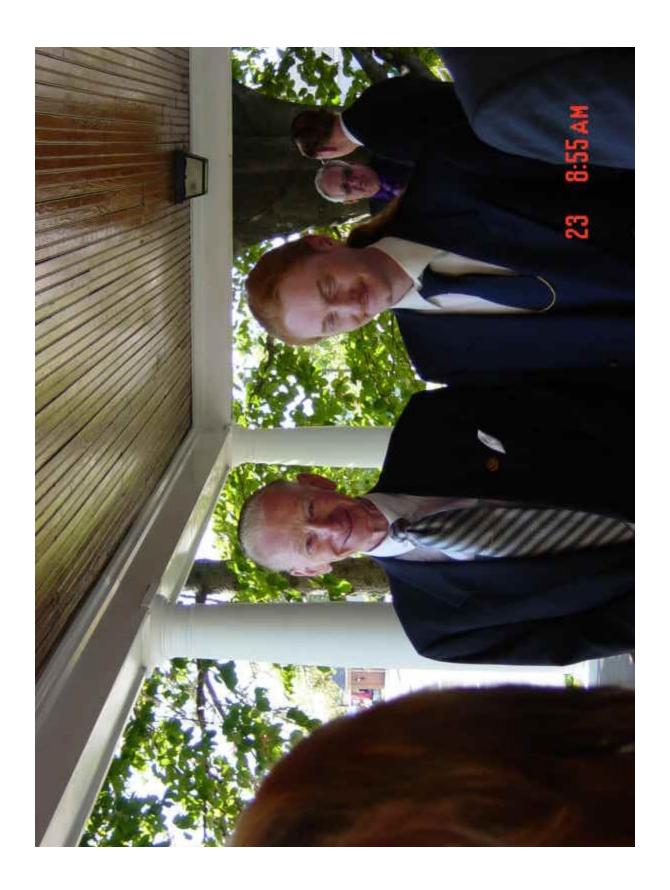
Notary Public

My commission expires:

BACGRY I CLARK, ACCORD OF LAW MERGRY PUBLIC 1 ESTER OF CARD MY COMMERCIAN HOLD FOR CARDON CARD, SERVING LARGES CARD.







IN THE HAMILTON COUNTY COURT OF COMMON PLEAS HAMILTON COUNTY, OHIO

STATE OF OHIO,

Case No. B 9508578

Plaintiff,

Judge Cooper

v.

:

ELWOOD JONES,

:

Defendant.

:

AFFIDAVIT OF CHERYL HORNE

Comes now the undersigned who makes the following statement, under oath, and before the undersigned Notary Public who is authorized by law to hear and accept oaths, and based upon her own personal knowledge of the facts averred herein states as follows:

- 1. My name is Cheryl Horne. I am a Mitigation / Client Relations Specialist at the Office of the Hamilton County Public Defender.
- 2. On October 5, 2018, Ann Ohmer, a Senior Paralegal in my office, asked for my help in obtaining some records from the Hamilton County Justice Center. She was looking for records documenting that two women—Delores Suggs and Linda Reed—had been housed in the jail at the same time in the mid-1990s.
- That same day, I made a request for records for these two women to Theresa Withers, supervisor of jail records at the Hamilton County Justice Center, to Ms. Withers in her office.
- 4. I provided Ms. Withers with the control number for each woman. Ms. Withers pulled up records from 1995 for each woman on her computer and printed them off for me.

- 5. True and correct copies of the records Ms. Withers gave to me are attached to this affidavit.
- 6. Although these records have a reference to "Microfiched Information" at the top of each page, I did not specifically ask Ms. Withers to search for microfiched records. Nothing about our interaction suggested to me that Ms. Withers had to do anything out of the ordinary to pull these records up on her computer.
- 7. On October 8, 2018, I spoke with attorney Erin Barnhart on the phone. I related to her how I obtained these records.

Cheryl Horne, Affiant

Notary Public

My commission Expired My Commission My Commission Expired My Commission My Com

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Run Date 10/5/2018 @ 10:32:34 AM

Microfiched Information by Control Number

JMS Number	Control Number	Name	٠.	Admitted Date	Released Date	Microfiched Date
335071	411591	REED, LINDA, J		10/28/1995	11/28/1995	8/26/1999

Run Date

10/5/2018 @ 10:33:08 AM

Page 1

Microfiched Information by Control Number

JMS	Control	Name	Admitted	Released	Microfiched
Number	Number		Date	Date	Date
335922	1949057	SUGGS, DELORES, M	11/6/1995	11/17/1995	8/26/1999