



MIKE DEWINE

★ OHIO ATTORNEY GENERAL ★

Executive Agencies
30 E. Broad St., 26th Floor
Columbus, OH 43215
614-466-2980
614-728-9470 Fax

www.OhioAttorneyGeneral.gov

February 24, 2017

Clifton Jackson
Lake Eire Correctional Institution
501 Thompson Road
P.O. Box 8000
Conneaut, OH 44030

*RE: Clifton Jackson, et al. v. Ohio State Hwy Patrol, et al.
Case No. 2:17-cv-00163*

Dear Mr. Jackson:

Enclosed please find Ohio State Highway Patrol Defendants' Answer to Complaint.

Very truly yours,

MIKE DEWINE
Ohio Attorney General

Morgan A. Linn/smh

MORGAN A. LINN
Assistant Attorney General
(614) 752-4797

MAL/smh
Enclosures

cc: all parties of record

5. Defendants admit in ¶ 16 of the complaint that Sergeant Michael Trader is an employee of the Ohio State Highway Patrol, but deny that Sergeant Trader's assigned location is 1970 W. Broad Street in Columbus, Ohio.
6. Defendants admit in ¶ 17 of the complaint that canine Argo was a fully commissioned police canine with the Ohio State Highway Patrol, assigned to Sergeant Trader and now retired, but deny that Argo's assigned location is 1970 W. Broad Street in Columbus, Ohio.
7. There are no allegations in ¶¶ 18-30 of the complaint, but as to the listed co-Defendants and their physical addresses, Defendants are without sufficient knowledge or information to form a belief as to ¶¶ 18-30 of the complaint, and therefore deny the same.
8. To the extent that any allegations state a claim upon which relief can be granted in ¶ 31 of the complaint, Defendants deny the allegations entirely.
9. To the extent that any allegations state a claim upon which relief can be granted in ¶ 32 of the complaint, Defendants deny the allegations entirely.
10. To the extent that any allegations state a claim upon which relief can be granted in ¶ 33 of the complaint, Defendants deny the allegations entirely.
11. To the extent that any allegations state a claim upon which relief can be granted in ¶ 34 of the complaint, Defendants deny the allegations entirely.
12. Defendants are without sufficient knowledge or information to form a belief as to the allegations in ¶¶ 35-48 of the complaint, and therefore deny the same.
13. Defendants restate their answers for ¶¶ 1-12 of the complaint.

FIRST AFFIRMATIVE DEFENSE

Plaintiffs' lawsuit is time-barred under Ohio's applicable two-year statute of limitations. According to the Ohio State Highway Patrol's Investigative Report, attached as Exhibit A, Plaintiff Jackson's arrest occurred on June 14, 2011, and his criminal case was closed via a criminal jury trial conviction on February 3, 2014.

SECOND AFFIRMATIVE DEFENSE

Defendants are protected by qualified immunity.

THIRD AFFIRMATIVE DEFENSE

Defendants acted in good faith at all relevant times, so punitive damages may not be awarded.

FOURTH AFFIRMATIVE DEFENSE

If Plaintiffs have suffered any harm, injury or damage, which Defendants deny, any harm was caused in whole or in part by Plaintiffs' own actions.

FIFTH AFFIRMATIVE DEFENSE

Defendants raise the defense of waiver.

SIXTH AFFIRMATIVE DEFENSE

Defendants raise the defense of mootness.

SEVENTH AFFIRMATIVE DEFENSE

Defendants raise the defense of collateral estoppel.

EIGHTH AFFIRMATIVE DEFENSE

Defendants raise the defense of the Eleventh Amendment.

NINTH AFFIRMATIVE DEFENSE

Defendants raise the defenses under Ohio R. Civ. P. 12(B).

TENTH AFFIRMATIVE DEFENSE

Defendants reserve the right to assert such additional affirmative defenses as they may become appropriate.

JURY DEMAND

Defendants demand a trial by jury.

Respectfully submitted,

MIKE DEWINE
Ohio Attorney General

s/ Morgan A. Linn

MORGAN A. LINN (0084622)
Assistant Attorney General
c/o Ohio State Highway Patrol
1970 West Broad Street, Suite 531
Columbus, OH 43228
Phone: (614) 752-4797
Facsimile: (866) 523-8132
morgan.linn@ohioattorneygeneral.gov

Counsel for Ohio State Highway Patrol Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2017, I submitted **Ohio State Highway Patrol Defendants' Answer** was filed electronically with the Court's e-file system. A copy of this pleading was mailed to Plaintiff Clifton Jackson, at Lake Erie Correctional Institution, 501 Thompson Road, P.O. Box 8000, Conneaut, Ohio 44030; the listed New York Plaintiffs at 117 Weaver Street, Buffalo, New York 14206; and the Michigan Plaintiffs at 8900 E. Jefferson Avenue, Apt. 304, Detroit, Michigan 48214.

s/ Morgan A. Linn

Morgan A. Linn
Assistant Attorney General

State of Ohio HP-26 10-0157-00 Rev. 03/01/2003	CAD Number: LHP110814000975	INCIDENT NUMBER 11 010115 1090	INCIDENT TYPE Offense
NATURE CODE: 699 Illegal Narcotics or Drugs (Excluding Marijuana)		CLEARANCE CODE: F	COMPLETION DATE: 6/22/2014
GEO CODE: Interstate Route (Turnpike is also IR)		A DEATH OF OFFENDER B PROSECUTION DECLINED C EXTRADITION DECLINED D VICTIM REFUSED TO COOPERATE E JUVENILE / NO CUSTODY F ARREST - ADULT	
Detailed GEO Code: Other		G ARREST - JUVENILE H WARRANT ISSUED I INVESTIGATION PENDING J CLOSED K UNFOUNDED U UNKNOWN Z COLD CASE	
TOD: 00:00	OHIO STATE HIGHWAY PATROL	CLEARANCE DATE/TIME 6/14/2011 12:00	CLEARED BY 0700
TOA: 00:00		SPECIAL SECTION:	

Ohio State Highway Patrol
Initial Incident Report

REPORT DATE / TIME				INCIDENT OCCURRED FROM				INCIDENT OCCURRED TO			
MONTH	DAY	YEAR	TIME	MONTH	DAY	YEAR	TIME	MONTH	DAY	YEAR	TIME
6	14	2011	08:44	6	14	2011	08:44	6	14	2011	12:00
COUNTY: Lorain County				FIPS Code: (9568) Brownhelm (Township of)							
INCIDENT LOCATION / REF PT. (Street, Apt, City, State, Zip): Ohio Turnpike, MP 155, Vermilion, Ohio - 44089				LATITUDE		LONGITUDE		K9 USED Yes, DSP and Other Agency		TYPE OF SEARCH: Probable Cause	

OFFENSE (OFFENSE CODE)	Count	INJ	PRO	PROPERTY	TYPE/CRIMINAL ACTIVITY
(2026.11) Possession of Drugs	1	N	C	F-1	P
(2023.24) Possessing Criminal Tools	1	N	C	F-5	
(2026.03) Trafficking in Drugs	1	N	C	F-1	P

(ENTER UP TO 3 FOR EACH OFFENSE)
 B - BUYING / RECEIVING
 C - CULTIVATING/MANUFACTURING/PUB
 D - DISTRIBUTING / SELLING
 E - EXPLOITING CHILDREN
 G - OTHER GANG
 J - JUVENILE GANG
 N - NO GANG INVOLVED
 O - OPERATING/PROMOTING/ASSISTING
 P - POSSESSING / CONCEALING
 T - TRANSPORTING / TRANSMITTING
 U - USING / CONSUMING

LOCATION OF THE OFFENSE				TARGET TYPE
47	COMMERCIAL LOCATIONS	32 Clothing Store 33 Drug Store 34 Liquor Store 35 Shopping Mall 36 Sporting Goods 37 Grocery / Supermarket 38 Variety / Convenience 39 Department Store 40 Other Retail Store 41 Factory / Mill / Plant 42 Other Building	51 Public Transit Vehicle 52 Other Outside Location	23A Pocket Picking 23B Purse Snatching 23C Shoplifting 23D Theft from building 23E Theft from Coin-Op Machine 23F Theft from Motor Vehicle 23G Motor Vehicle Parts/Access 24D Theft of Motor Vehicle 23H Other
RESIDENTIAL STRUCTURE				SUBSPECTED OF USING:
PUBLIC ACCESS BUILDING				
RETAIL				<input type="checkbox"/> ALCOHOL <input type="checkbox"/> DRUGS <input type="checkbox"/> COMPUTER EQUIP <input checked="" type="checkbox"/> NOT APPLICABLE <input type="checkbox"/> CARGO THEFT

METHOD OF OPERATION:

METHOD OF ENTRY	METHOD OF ENTRY - BURGLARY / B&E				METHOD OF ENTRY - MOTOR VEHICLE THEFT			
<input type="checkbox"/> Force <input type="checkbox"/> No Force No. Promises Entered 0	ENTRY	EXIT	ENTRY	EXIT	ENTRY	EXIT	ENTRY	EXIT
	1 BASEMENT 2 1ST FLOOR 3 2ND FLOOR 4 OTHER 5 UNKNOWN	1 DOOR 2 WINDOW 3 GARAGE 4 SKYLIGHT 5 OTHER 6 UNKNOWN	1 FRONT 2 SIDE 3 REAR 4 ROOF 5 OTHER 6 UNKNOWN		01 MOTOR RUNNING/KEYS IN CAR 02 UNLOCKED 03 DUPLICATE KEY USED 04 WINDOW BROKEN 05 TOWED		06 HOT WIRED 07 SLIM JIM/COAT HANGER 08 TUMBLERS REMOVED 09 COLUMN PEELED 10 IGNITION PEELED	

TYPE OF WEAPON FORCE: None

REQUESTING AGENCY:

REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700	DATE: 6/14/2011
APPROVING OFFICER: Sgt. ANTHONY L DECHOUDENS	UNIT NUMBER: 0698	DATE: 1/16/2014

State of Ohio
 HP-26
 10-0167-00
 Rev. 08/01/2003



**Ohio State Highway Patrol
 Initial Incident Summary**

INCIDENT NO. 11 010115 1090	REPORT DATE / TIME 6/14/2011 08:44	PHOTO POUCH NO.
---------------------------------------	---	------------------------

Incident Summary

Vehicle was stopped for a traffic violation. A K-9 responded to the scene and subsequently indicated on the vehicle. A probable cause search of the vehicle revealed illegal narcotics in the vehicle. Driver was charged and incarcerated at Lorain County Jail.

Reporting Officer: Tpr. CHRISTOPHER H BEYER	Unit No: 0708	Date: 6/14/2011
Approving Officer: Sgt. ANTHONY L. DECHOUDENS	Unit No: 0896	Date: 1/10/2014

State of Ohio
HP-245US
10-0157-50
Rev. 08/01/2003



Ohio State Highway Patrol
REPORT OF INVESTIGATION
Suspect / Arrest Report

INCIDENT NUMBER 11 010115 1090
REPORT DATE/TIME 6/14/2011 08:44

TOTAL SUSPECTS : 1

<input checked="" type="checkbox"/> Adult <input type="checkbox"/> Juvenile <input type="checkbox"/> Unknown <input type="checkbox"/> Business <input type="checkbox"/> Suspect <input type="checkbox"/> Arrestee <input checked="" type="checkbox"/> Suspect/Arrestee <input type="checkbox"/> Runaway <input type="checkbox"/> Missing <input type="checkbox"/> Other		CHECK APPROPRIATE CATEGORY 3	CHARGES FILED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
NAME (Last, First, Middle): Jackson, Clifton, A		SSNR: [REDACTED]	
ADDRESS: 47 Oxford St, Upper Buffalo, NY - 14209		PHONE #: 7165633782	
EMPLOYER NAME & ADDRESS:		PHONE #:	
PLACE OF BIRTH Buffalo	DRIVER'S LICENSE # & STATE 171445740 NY	STATE EMPLOYEE <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	OCCUPATION/SCHOOL Collections
AGE / DOB 42 3/5/1969	GENDER M	RACE Black, Non-Hispanic Origin	HEIGHT 5ft 8in
		WEIGHT 205	HAIR Black
		EYES Brown	MARITAL STATUS Single
ADDITIONAL DESCRIPTION:			
SCARS, MARKS, TATTOOS: 1) 2) 3) 4) 5)		<input checked="" type="checkbox"/> RESIDENT <input type="checkbox"/> TOURIST <input type="checkbox"/> MILITARY <input type="checkbox"/> STUDENT <input type="checkbox"/> OTHER <input type="checkbox"/> UNKNOWN <input type="checkbox"/> NOT REPORTED	
POTENTIAL INJURIES:			
TYPE WEAPON FORGONE:			
SUSPECT USED: 98			
99 NONE	13B OTHER FULLY AUTOMATIC WEAPON	10 IMITATION FIREARM	50 POISON
11 FIREARM	14 SHOTGUN	17 SIMULATED FIREARM	60 EXPLOSIVES
12 HANDGUN	15 OTHER FIREARM	18 BB / PELLET GUN	65 FIRE / INCENDIARY DEVICE
12A AUTOMATIC HANDGUN	16A SEMI-AUTOMATIC SPORTING RIFLE	20 KNIFE / CUTTING INSTRUM.	70 DRUGS/NARC/SLEEP PILLS
13 RIFLE	16B SEMI-AUTOMATIC ASSAULT FIREARM	30 BLUNT OBJECT	80 OTHER WEAPON
13A FULLY AUTOMATIC RIFLE	16C MACHINE PISTOL	35 MOTOR VEHICLE	85 ASPHYXIATION
		40 PERSONAL WEAPON	U UNKNOWN

NAME	ADDRESS (Street, Apt., City, State, Zip)	PHONE	RELATION

ARREST / OFFENSE DESCRIPTION	ARREST / OFFENSE CODE	COUNT	RP / MA / DEGREE	DISPOSITION	LARGENY	ARREST / LARGENY TYPE
Possession of Drugs	2925.11	1	F-1	Dismissed		23A POCKET PICKING 23B PURSE SNATCHING
Trafficking in Drugs	2925.09	1	F-1	GUILTY		23C SHOP LIFTING 23D THEFT FROM BUILDING
Possessing Criminal Tools	2923.24	1	F-5	Reduced		23E THEFT FROM COIN-OP MACHINE 23F THEFT FROM MOTOR VEHICLE 23G MOTOR VEH. PARTS/ACCESSORIES 240 THEFT OF MOTOR VEHICLE 23H OTHER

WARRANT NUMBER	WARRANT DESCRIPTION	WARRANT NUMBER	WARRANT DESCRIPTION
1.		2.	
3.		4.	

ARREST DATE: 6/14/2011 TIME: 08:44 ARREST LOCATION (Street, Apt., City, State, Zip): Ohio Turnpike, MP 135, Vermilion OH, 44089 CITATION NUMBER: 2926822

ARRESTEE ARMED WITH: 1. None 2. 3. ARREST DISPOSITION: Stated / Incarcerated BAIL: \$0.00

FINGER PRINTED: YES NO THUMB PRINTED: YES NO DNA TAKEN: ITN NUMBER: FBI/BCI #:

MULTIPLE ARRESTEE SEGMENTS INDICATOR COUNT ARRESTEE MULTIPLE ARRESTEE INDICATOR N/A

ARREST TYPE: Complaint Crime In Progress Warrant
 Court Summons/Citation Order Of Protection Other

COURT: COURT DATE: 6/14/2011

JAIL SERVICE: YEARS: 11.00 DAYS: 0.00

JUVENILE PARENT / GUARDIAN NOTIFIED: YES NO DATE/TIME NOTIFIED: NOTIFIED by: JUVENILE DISPOSITION:

PARENT / GUARDIAN NAME & ADDRESS: PHONE: RELATIONSHIP:

PARENT / GUARDIAN NAME & ADDRESS: PHONE: RELATIONSHIP:

DATE OF LAST CONTACT: DATE OF EMANCIPATION: NCIC:

LAST SEEN WEARING:

REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700	DATE: 6/14/2011
APPROVING OFFICER: Sgt. ANTHONY L DECHOUDENS	UNIT NUMBER: 0696	DATE: 1/18/2014

State of Ohio
 HP-24VEH
 10-0187-00
 Rev. 08/01/2003



Ohio State Highway Patrol
 REPORT OF INVESTIGATION
 Vehicle Report

INCIDENT NUMBER 11 010115 1000
REPORT DATE/TIME 01/14/2011 08:44

VEHICLE INFORMATION									
CHECK CATEGORIES <input type="checkbox"/> Abandoned <input type="checkbox"/> Impounded <input type="checkbox"/> Stolen <input type="checkbox"/> Received <input type="checkbox"/> Recovered <input type="checkbox"/> Used In A Commission of a Crime <input type="checkbox"/> N/A									
LICENSE GSC0841	LIC STATE PA	VEHICLE IDENTIFICATION NUMBER / OAN 4T1BF3EK1AU100634			NCIC NO.	STOLEN OPTION		IS VEHICLE LOCATED <input type="checkbox"/> YES <input type="checkbox"/> NO	VEHICLE NO. 1
VALUE 10000.00	VEH YR. 2010	MAKE Toyota	MODEL Camry	STYLE 4dr	VEHICLE COLOR TOP Silver BOTTOM Silver		TRACK TYPE		
OWNER NAME & ADDRESS (Street, City, State, Zip) Rent A Car Hertz & 19501 Maplewood Ave., , Cleveland, PA - 44135								PHONE 2162878900	
VEH. ASSOC. W/ SUSPECT # 1		VEH. ASSOC. W/ VICTIM #		TOWED BY :			OWNER VERIFIED BY : Registration		
ADDITIONAL DESCRIPTION								DATE TIME NOTIFIED	

REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700	DATE: 01/14/2011
APPROVING OFFICER: Sgt. ANTHONY L DECHOUDENS	UNIT NUMBER: 0598	DATE: 1/18/2014

State of Ohio
 HP-24PRO
 10-0157-50
 Rev. 08/01/2003



Ohio State Highway Patrol
 REPORT OF INVESTIGATION
 Property Report

INCIDENT NUMBER 11 010115 1090
REPORT DATE/TIME 6/14/2011 08:44

TYPE PROPERTY LOSS (ENTER CODES BELOW)	1 NONE	3. COUNTERFEITED / FORGED	5. STOLEN / ETC	7. RECOVERED	E EVIDENCE	P PHOTO	U UNKNOWN	
	2 BURNED	4. DESTROYED / DAMAGED / VANDALIZED & SEIZED	D DAMAGED	F FOUND	1 LOST			
PROPERTY CODE	LOSS CODE	QUANTITY	PROPERTY VALUE	VICTIM NO.:	SUSPECT NO.:	VEHICLE NO.:	VEH LIC STATE :	VEHICLE YEAR :
31	6	2.000			1			
PROPERTY DESCRIPTION	2 Kilograms of Cocaine						FOUND LOCATION Orange Buffet bag in trunk	
MAKE / BRAND	MODEL		SERIAL			N.C.I.C. #		
CALIBER	TYPE	BARREL LENGTH		FINISH		N.C.I.C. ENTRY #		
DRUG TYPE	UNIT OF MEASURE	DRUG CODE		PILL TYPE	PILL SHAPE	PILL COLOR1	PILL COLOR2	
Weighted Drug	Kilogram	Cocaine/Cocaine Derivatives						
PILL MARKING 1					PILL MARKING 2			
NAME & ADDRESS						OWNER PHONE		
EVIDENCE CODE	EVIDENCE DATE/ TIME	EVIDENCE COLLECTED BY			EVIDENCE FINAL DISPOSITION		OTHER EVIDENCE	
Weighted Drug	6/14/2011 09:20	(0700) Tpr. CHRISTOPHER H BEYER			Destroyed			
PROPERTY CODE	LOSS CODE	QUANTITY	PROPERTY VALUE	VICTIM NO.:	SUSPECT NO.:	VEHICLE NO.:	VEH LIC STATE :	VEHICLE YEAR :
01	6	1292.00	1292.00		1			
PROPERTY DESCRIPTION	1,292 In US currency						FOUND LOCATION Left front pocket of Mr. Jackson	
MAKE / BRAND	MODEL		SERIAL			N.C.I.C. #		
CALIBER	TYPE	BARREL LENGTH		FINISH		N.C.I.C. ENTRY #		
DRUG TYPE	UNIT OF MEASURE	DRUG CODE		PILL TYPE	PILL SHAPE	PILL COLOR1	PILL COLOR2	
PILL MARKING 1					PILL MARKING 2			
NAME & ADDRESS						OWNER PHONE		
EVIDENCE CODE	EVIDENCE DATE/ TIME	EVIDENCE COLLECTED BY			EVIDENCE FINAL DISPOSITION		OTHER EVIDENCE	
	6/14/2011 09:20	(0700) Tpr. CHRISTOPHER H BEYER			Turned Over to Other Agency			

PROPERTY CODES	17 COMP.HARDWARE/SOFTWARE	38 BUSES	60 CHEMICALS
EXCHANGE MEDIUMS	18 OFFICE EQUIPMENT	39 TRUCKS	61 CROPS
01 MONEY	19 STEREO EQUIPMENT, TV AND RADIO (NON-VEHICLE)	40 TRAILERS	62 DOCUMENTS/PERSONAL OR BUSINESS
02 CREDIT/DEBIT CARD	20 RECORDINGS	41 WATERCRAFT	63 EXPLOSIVES
03 NEGOTIABLE INSTRUMENTS	21 SPORTS EQUIPMENT (ALL EXCEPT BICYCLES AND FIREARMS)	42 RECREATIONAL VEHICLE	64 FIREARM ACCESSORIES
04 OTHER EXCHANGE MEDIUMS	22 PHOTOGRAPHIC EQUIPMENT	43 OTHER MOTOR VEHICLE	65 FUEL
DOCUMENTS	23 FARM EQUIPMENT	WEAPONS	66 IDENTITY-INTANGIBLE
05 NON-NEGOTIABLE INSTRUMENTS	24 HEAVY CONSTRUCTION / INDUSTRIAL EQUIPMENT	44 FIREARMS	67 LAW ENFORCEMENT EQUIPMENT
06 PERSONAL (IDENTITY) PAPERS	25 BUILDING SUPPLIES FOR CONSTRUCTION	45 OTHER WEAPONS	68 LAWN/YARD/GARDEN EQUIPMENT
07 OTHER DOCUMENTS	26 TOOLS	STRUCTURES	69 LOGGING EQUIPMENT
VALUABLES	27 VEHICLE PARTS / ACCESSORIES	46 SINGLE OCCUPANCY	70 MEDICAL/MEDICAL LAB EQUIPMENT
08 JEWELRY/PRECIOUS METALS	28 SCHOOL SUPPLIES	47 OTHER DWELLINGS	71 METALS, NON-PRECIOUS
09 ART OBJECTS, ANTIQUES, AND OTHER PRECIOUS ITEMS	29 OTHER EQUIPMENT	48 COMMERCIAL/BUSINESS	72 MUSICAL INSTRUMENTS
10 OTHER VALUABLES	CONSUMABLE ITEMS	49 INDUSTRIAL/MANUFACTURING	73 PORTABLE ELECTRONIC COMMUNICATIONS
PERSONAL EFFECTS	30 ALCOHOL	50 PUBLIC/COMMERCIAL	74 WATERCRAFT
11 CLOTHING FURS	31 DRUGS / MARIJUANA	51 STORAGE	EQUIPMENT/PARTS/ACCESSORIES
12 PURCHASES/HANDBAGS/WALLETS	32 CONSUMABLE GOODS	52 OTHER STRUCTURES	
13 OTHER PERSONAL EFFECTS	ANIMALS	OTHER	
HOUSEHOLD ITEMS	33 LIVE STOCK	53 MERCHANDISE	
14 HOUSEHOLD ITEMS	34 HOUSEHOLD PETS	54 OTHER PROPERTY	
EQUIPMENT	VEHICLES	55 PENDING INVENTORY	
15 DRUG/MARIJUANA EQUIPMENT	35 AIRCRAFT	56 SPECIAL CATEGORIES	
16 GAMBLING EQUIPMENT	36 AUTOMOBILES	57 AIRCRAFT PARTS OR ACCESSORIES	
	37 BICYCLES	58 ARTISTIC SUPPLIES OR ACCESSORIES	
		59 CAMPING/HUNTING/FISHING EQUIPMENT/SUPPLIES	

REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700	DATE: 6/14/2011
APPROVING OFFICER: Sgt. ANTHONY L DECHOUDENS	UNIT NUMBER: 0898	DATE: 1/18/2014

State of Ohio
 HP-24-VRW
 10-0167-20
 Rev. 03/01/2003



Ohio State Highway Patrol
REPORT OF INVESTIGATION
 Victim/Reportee/Witness Report

INCIDENT NUMBER 11 010115 1060
REPORT DATE/TIME 6/14/2011 08:44

VICTIM TYPE: <input type="checkbox"/> Individual <input type="checkbox"/> Financial Institution <input type="checkbox"/> Police Officer (In The Line Of Duty) <input checked="" type="checkbox"/> Society / Public <input type="checkbox"/> Other	
<input type="checkbox"/> Business <input type="checkbox"/> Government <input type="checkbox"/> Religious Organization <input type="checkbox"/> Unknown <input type="checkbox"/> Trooper <input type="checkbox"/> State Agency	
<input checked="" type="checkbox"/> Victim <input type="checkbox"/> Reportee	<input type="checkbox"/> Witness <input type="checkbox"/> Rapee
NAME (Last, First, Middle): Society / Public	
ADDRESS (Street, Apt, City, State, Zip): , Vermilion	
OCCUPATION:	
STATE EMPLOYEE: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
RESIDENTIAL STATUS: <input type="checkbox"/> Resident <input type="checkbox"/> Military <input type="checkbox"/> Other <input type="checkbox"/> Tourist	
STATEMENT OBTAINED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
TYPE: <input type="checkbox"/> Written <input type="checkbox"/> Oral <input type="checkbox"/> Taped <input type="checkbox"/> Other	
AGE / DOB	GENDER
RACE :	
HEIGHT FROM - TO	WEIGHT FROM - TO
HAIR	EYES
EMPLOYER NAME & ADDRESS	
PHONE #:	
VICTIM <input type="checkbox"/> YES INJURED <input checked="" type="checkbox"/> NO	IP INJURED, DESCRIBE INJURES: 1) 2) 3) 4) 5)
VICTIM DECEASED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	VICTIM WITNESS REFERRAL INFO: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
TYPE OF REFERRAL	
AGG. ASLT / HOMICIDE CIR: 1) 2)	
VICTIM/SUSPECT RELATIONSHIP: 1) Citizen/Society	
VICTIM OFFENSE LINK: 1)2929.24 2)2929.03 3)2925.11	
JUSTIFIABLE HOMICIDE:	ACTIVITY TYPE
ASSIGNMENT TYPE	LE CRT - OTHER JURISDICTION
My signature verifies that the information on this report is accurate and true	
DATE:	

REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700	DATE: 6/14/2011
APPROVING OFFICER: Sgt. ANTHONY L DECHOUENS	UNIT NUMBER: 0995	DATE: 1/16/2014

State of Ohio
 HP-24NOT
 10-0167-50
 Rev. 08/01/2003



Ohio State Highway Patrol
 REPORT OF INVESTIGATION
 Investigative Notes

INCIDENT NO: 11 010115 1090	REPORT DATE/TIME 6/14/2011 08:44	PHOTO POUCH NO.
--------------------------------	-------------------------------------	-----------------

Tuesday, June 14, 2011 13:30 0700 Tpr. CHRISTOPHER H BEYER

LHP110614000975 06/14/110844 Hours While on patrol on the Ohio Turnpike at milepost 135 EB (Brownhelm twp), I observed a silver 2010 Toyota Camry bearing PA registration GSC 0641. The vehicle was following a mobile home in front of it by 2-3 car lengths away in the right lane at approximately 60-65 mph. At the time I observed the violation I was in the middle lane 300-400 feet behind the vehicle. I initiated a traffic stop of the vehicle at milepost 137 EB and came in contact with the driver and only occupant, Clifton A. Jackson (3-5-69). I advised him of the following too close violation and asked for his license, registration and insurance. He handed me his New York (residence in Buffalo, NY) license. I asked where he was going to. He stated, "Cleveland to his cousin's house". I asked who owned the car and he stated, "My cousin". I asked where he was coming from. He stated his mom's house near the Detroit area in Beloit, MI. He stated he was visiting his mom as she is sick. He handed me a rental agreement for the vehicle (Renters name was Latriece Thomas). I asked when she rented the car for him. He stated, "yesterday actually". Mr. Jackson stated she had the vehicle for a while and then gave it to him. I asked what his girlfriend's name was. He stated, "Latriece Thomas". I asked where he was going in Cleveland. He stated, "Off 480 area, near Stoney Brook or Stoney Point". I then returned to my patrol car. While back at my patrol car I radioed Tpr. Mike Trader and asked that he and his K-9 partner, Argo, come to my location and do a sniff of the vehicle. 0850 Hours Tpr. Trader arrived on scene. I walked back up to the vehicle, where Mr. Jackson was and asked him to come back to my patrol car. After asking him to come back to my patrol car he was hesitant to exit the car and looked around. When he did exit the car he did so slow and deliberately. He took 2 cell phones from his vehicle and brought them with him. Prior to being seated in my car he was voluntarily patted down. He was asked to sit down in the back seat of my patrol car which he did voluntarily. 0851A review of my in car audio/video tape after the stop was over revealed the below cell phone conversation of Mr. Jackson with other person's on speaker phone while the vehicle was being searched. Mr. Jackson was in the back seat of my patrol car when these conversations took place. While sitting in the back seat of my patrol car Mr. Jackson began to speak with a female on the speaker phone from one of his cell phones, which was recorded by the in car audio. He states, "they are about to put the dog on me". She says, "is you serious"? A pause is heard in the conversation followed by the female saying,...."damn". The female asks what am I supposed to do? He then tells the female to call his brother. The female asks Mr. Jackson do you have alot? He states, "no". He tells the female to be quiet they are walking the dog around the car. 0853I assisted in traffic control with Trooper Trader and Argo as they walked around the vehicle as it was parked close to the white line. There was a positive K-9 indication to the vehicle by Argo on the left side of the vehicle. I re-approached my patrol car to speak with Mr. Jackson. As I walked back to my car Mr. Jackson was heard on the in car audio telling the female to be quiet, as I was walking back to the car. I opened the car door and read Mr. Jackson his Miranda Rights. I advised him the K-9 indicated to his vehicle. I asked him if there was any reason the K-9 would indicate to the vehicle. He stated, "no". I asked him if he had used or had any drugs or knew of anyone that had used or had drugs in the car. He stated, "no". I asked if everything in the car was. He hesitated stating, "not everything in the car is mine but there's no drugs in the car". I then asked what in the car was not his. He again retracted his statement and said all the contents inside the car were his. 0855As we began a probable cause search of the car Mr. Jackson began to speak to the female again stating, "hold on babe". He then phones a male speaking to him stating, "whats up bro". Mr. Jackson proceeds to speak to the male regarding the narcotics in the car. The male asks if he stashed it. Mr. Jackson stated, "No it wouldn't fit." The male asks where it's at. Mr. Jackson stated "in the bag". The male states, "You're fucked". Mr. Jackson goes on to state over and over, "he didn't have a reason to stop me". 0859 Inside a large orange duffel bag in the trunk I found 2 kilograms of suspected cocaine placed side by side wrapped in black tape and saran wrap. It was in the front zipper portion of the bag. Nothing else was in the front of the bag with it. The center of the bag contained brand new male's dress shirts and blue jeans (tags on still). On the

REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700	DATE: 6/14/2011
APPROVING OFFICER: Sglt ANTHONY L DECHOUDENS	UNIT NUMBER: 0696	DATE: 1/16/2014

State of Ohio
HP-24NOT
10-0157-50
Rev. 08/01/2003



Ohio State Highway Patrol
REPORT OF INVESTIGATION
Investigative Notes

INCIDENT NO: 11 010115 1090	REPORT DATE/TIME 6/14/2011 08:44	PHOTO POUCH NO.
<p>right side of the bag with the clothing was two plastic bags containing a silver colored watch that said Breitling on it. The second bag contained a diamond looking necklace, bracelet, and ring. I seized the jewelry. Also found was a black toiletries bag with miscellaneous toiletry products. In the bottom of the bag was a zipper area with 4 boxes of male shoes, some tennis shoes and some Italian dress shoes. I re-approached the patrol car and advised Mr. Jackson he was being placed in handcuffs. He was heard on his cell phone stating to the male he was being arrested. I advised Mr. Jackson to put his arms behind his back in the back seat and not get out of the car. He did not do as instructed immediately. I advised him to not give us any problems as we had a K-9 dog. 0901Mr. Jackson was subsequently placed in handcuffs behind his back and placed under arrest and taken to the front of my patrol car. After being placed in handcuffs he was asked what was up there, referring to the drugs. He stated he didn't want to be disrespectful but didn't want to say anything. A search incident to custodial arrest was done on Mr. Jackson in front of my patrol car, on camera. Inside his left front jeans pocket was \$1,262 dollars of US currency. I asked what type of work he did. Mr. Jackson stated he was a collections agent. It was seized and handed to Trooper Trader. He was later given a state property seizure form, which he later signed and was given a copy of. No illegal narcotics were seized on Mr. Jackson and he was placed in the back seat of the patrol car. After being placed in my car he began a conversation with the male again, speaking about the stop. He placed his cell phone on speaker phone to talk to the other male subject. A further search of the vehicle found no more illegal narcotics. The vehicle was towed from the scene by Rich's Towing to the Middleburg Heights office. L.E.A.D.S. Had been out of service on the initial stop and had since come back into service. I radioed District 10 radio Mr. Jackson's license information and license plate to run. I also asked for a criminal history check be run as well. Prior to leaving the scene Mr. Jackson's two cell phones were seized and placed inside an evidence bag. The cell phones were a Motorola cell phone Serial # 364VLYT9WX and a Samsung cell phone serial # AA1B106AS. Mr. Jackson was taken to the Milan Patrol Post for charges and other forms. D.E.A. Agent Taliano and an assistant came to the post and spoke with Mr. Jackson. He declined to speak with them. Trooper Weaver came to the Milan Patrol Post and assisted with forms and the incident. He took the jewelry to the Crider Jewelers in Perkins Township, where it was inspected. It was found to be all cubic zirconia. It was later released back to Mr. Jackson. The \$1,262 was given to Sergeant Anthony L. Dechoudens and was taken to Key Bank in Milan Ohio. A cashier's check was obtained and subsequently made out to the Ohio Marshall's Service. It was turned over to Agent Taliano and his assistant. Both cell phones were released into Agent Taliano's custody. At 1100 hours, Trooper Trader cut into one of the packages. As he cut into it he found axel grease on it, inside the packaging (tape, seran wrap, axel grease). A N.I.K. test was completed for suspected cocaine, which was of a white powdery substance and the results were positive for cocaine. The narcotics and money were subsequently turned over to Agent Taliano. Mr. Jackson was served with a forfeiture notice for his money. He signed it and I gave him a copy. He was given a copy of his charges for aggravated drug trafficking, possession of cocaine, and criminal tools. He was then transported to the Lorain County Jail. In looking at his criminal history I found it to be 10-20 pages. He has had OVER 10 FELONY DRUG CHARGES 2 OF WHICH WERE FEDERAL CONVICTIONS. HE HAS SPENT NUMEROUS YEARS IN PRISON FOR THESE AND OTHER CRIMINAL OFFENSES. Mr. Jackson was taken to Vernilion Municipal Court for arraignment. His bond was set at 500,000 cash surety. His pre-trial was set for 6-21-11 at 9:15 a.m. As of 7-8-11 no grand jury date set by Lorain County Common Pleas. I received a subpoena from Lorain County Grand Jury to testify on 8-10-11 on this case. I testified for Lorain County Grand Jury on this case on 8-10-11. Mr. Jackson was indicted on all above charges. He has a pre-trial set for 9-19-11. 09/19/2011 Journal Entry DEFENDANT WAIVES STATUTORY TIME FOR SPEEDY TRIAL PURSUANT TO R.C. 2945.71 ET. SEQ. PRE-TRIAL HAD. AT THE DEFENDANT'S REQUEST, PRE-TRIAL IS HEREBY CONTINUED UNTIL: 11/7/11 AT 8:30 A.M. (EMZ)</p>		
REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700	DATE: 6/14/2011
APPROVING OFFICER: Sgt. ANTHONY L DECHOUDENS	UNIT NUMBER: 0698	DATE: 11/6/2014

State of Ohio
HP-24NOT
10-0167-50
Rev. 08/01/2003



Ohio State Highway Patrol
REPORT OF INVESTIGATION
Investigative Notes

INCIDENT NO: 11 010115 1090	REPORT DATE/TIME 6/14/2011 08:44	PHOTO POUCH NO.
<u>Wednesday, June 15, 2011 11:39</u>		<u>0696 Sgt. ANTHONY L DECHOUDENS</u>
06/15/11 Case reviewed by Sgt. A.L. DeChoudens. Victim/Witness does not apply. Solvability factor is excellent. Criminal Patrol Point was entered into RIMS. The \$1262 in US currency was taken to the Key Bank in Milan, Ohio and placed on a certified check. The check was made to the US Marshall Service and released to them.		
<u>Saturday, June 18, 2011 16:00</u>		<u>0374 Sgt. BRIAN J GOCKSTETTER</u>
The case was reviewed by Sgt. B.J. Gockstetter.		
<u>Saturday, July 09, 2011 10:30</u>		<u>0374 Sgt. BRIAN J GOCKSTETTER</u>
The case status was reviewed by Sgt. Gockstetter. The following is the Lorain County Common Pleas Court Docket entry: 07/06/2011 TRANSCRIPT TRANSCRIPT FILED. FROM VERMILION MUNICIPAL COURT (4) CRA 1100262A - POSS OF COCAINE CRA 1100262B - AGGRAVATED DRUG TRAFFICKING CRA 1100262C - POSS CRIMINAL TOOLS TRD 1101247 - FOLLOW TOO CLOSE BOND SET AT \$500,000 CASH @ 10%. CASH BOND POSTED BY ANGEL MYLES, 8667 W. PARKWAY ST., DETROIT MI 48239. BAILED. 07/07/2011 N/A Receipt #: 11-0024959 Processed. 07/07/2011 BOND SURCHARGE (IDSF 2937.22) BOND SURCHARGE (IDSF 2937.22) APPLIED The case remains open pending presentation of case to Lorain County Grand Jury. The solvability factor is considered excellent.		
<u>Friday, August 12, 2011 13:11</u>		<u>0696 Sgt. ANTHONY L DECHOUDENS</u>
08/12/11 Listed is the last court docket entry made by the Lorain County Common Pleas Court: 08/11/2011 INDICTMENT INDICTMENT FILED. SUMMONS W/COPY OF INDICTMENT ISSUED TO LORAIN COUNTY SHERIFF. INDICTMENT FOR TRAFFICKING IN DRUGS, 2925.03(A)(2), F-1 SPECIFICATION ONE, SPECIFICATION TWO; POSSESSION OF DRUGS, 2925(A), F-1 SPECIFICATION ONE, POSSESSING CRIMINAL TOOLS, 2923.24(A), F-5		
<u>Thursday, September 22, 2011 14:52</u>		<u>0696 Sgt. ANTHONY L DECHOUDENS</u>
09/22/11 Listed below is the last docket entry from the Lorain County Common Pleas Court: DEFENDANT WAIVES STATUTORY TIME FOR SPEEDY TRIAL PURSUANT TO R.C. 2945.71 ET. SEQ. PRE-TRIAL HAD. AT THE DEFENDANT'S REQUEST, PRE-TRIAL IS HEREBY CONTINUED UNTIL: 11/7/11 AT 8:30 A.M. (BMZ) Solvability factor is excellent.		
REPORTING OFFICER:	Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700
APPROVING OFFICER:	Sgt. ANTHONY L DECHOUDENS	DATE: 6/14/2011
		UNIT NUMBER: 0696
		DATE: 1/18/2014

State of Ohio
 HP-24NOT
 10-0157-50
 Rev. 08/01/2003



Ohio State Highway Patrol
 REPORT OF INVESTIGATION
 Investigative Notes

INCIDENT NO:	REPORT DATE/TIME	PHOTO POUCH NO.
11 010115 1090	6/14/2011 08:44	
<u>Friday, October 21, 2011 15:16</u>		<u>0696 Sgt. ANTHONY L</u>
<u>DECHOUDENS</u>		
10/21/11 Listed below is the last docket entry from the Lorain County Common Pleas Court: DEFENDANT WAIVES STATUTORY TIME FOR SPEEDY TRIAL PURSUANT TO R.C. 2945.71 ET. SEQ. PRE-TRIAL HAD. AT THE DEFENDANT'S REQUEST, PRE-TRIAL IS HEREBY CONTINUED UNTIL: 11/7/11 AT 8:30 A.M. (EMZ) Solvabilty factor is excellent.		
<u>Wednesday, November 16, 2011 15:41</u>		<u>0696 Sgt. ANTHONY L</u>
<u>DECHOUDENS</u>		
11/16/11 Pre-trial has been rescheduled until 12/12/11 at 1330 hours.		
<u>Tuesday, December 20, 2011 14:03</u>		<u>0696 Sgt. ANTHONY L</u>
<u>DECHOUDENS</u>		
12/20/11 Listed below is the last court docket entry: DEFENDANT WAIVES STATUTORY TIME FOR SPEEDY TRIAL PURSUANT TO R.C. 2945.71 ET. SEQ. PRE-TRIAL NOT HAD. AT THE DEFENDANT'S REQUEST, PRE-TRIAL IS HEREBY CONTINUED UNTIL: 2/6/2012 AT 1:00 P.M. DEFENDANT'S MOTION TO SUPPRESS TO BE HEARD AT NEXT HEARING. (EMZ)		
<u>Monday, January 23, 2012 11:59</u>		<u>0696 Sgt. ANTHONY L</u>
<u>DECHOUDENS</u>		
1/23/12 Pre-trial still scheduled for 2/23/12 at 1300 hours.		
<u>Monday, February 20, 2012 15:09</u>		<u>0696 Sgt. ANTHONY L</u>
<u>DECHOUDENS</u>		
2/20/12 Pre-trial still scheduled for 2/23/12 at 1300 hours.		
<u>Monday, April 23, 2012 08:27</u>		<u>0696 Sgt. ANTHONY L DECHOUDENS</u>
4/23/12 Listed is the last court docket entry: DUE TO EMERGENCY OF THE COURT, MOTION TO SUPPRESS SET FOR 4/9/12 IS CANCELLED. NEW MOTION TO SUPPRESS HEARING SET FOR 6/4/12 AT 1:30 PM.		
<u>Wednesday, May 16, 2012 13:12</u>		<u>0696 Sgt. ANTHONY L</u>
<u>DECHOUDENS</u>		
5/16/12 NEW MOTION TO SUPPRESS HEARING SET FOR 6/4/12 AT 1:30 PM.		
REPORTING OFFICER:	Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700
APPROVING OFFICER:	Sgt. ANTHONY L DECHOUDENS	UNIT NUMBER: 0696
		DATE: 6/14/2011
		DATE: 1/16/2014

State of Ohio
 HP-24NOT
 10-0157-50
 Rev. 08/01/2003



Ohio State Highway Patrol
 REPORT OF INVESTIGATION
 Investigative Notes

INCIDENT NO: 11 010115 1090	REPORT DATE/TIME 6/14/2011 08:44	PHOTO POUCH NO.
Friday, June 01, 2012 15:35 0696 Sgt. ANTHONY L DECHOUDENS		
6/1/12NEW MOTION TO SUPPRESS HEARING SET FOR 6/4/12 AT 1:30 PM.		
Tuesday, July 17, 2012 14:09 0696 Sgt. ANTHONY L DECHOUDENS		
7/17/12MOTION TO SUPPRESS HEARING HAD IN-PART. HEARING CONTINUED FOR FURTHER EVIDENCE ON 7/23/12 AT 1:30 P.M.		
Sunday, December 16, 2012 10:35 1560 Sgt. SCOTT D POWERS		
Case pending new court date.		
Saturday, January 05, 2013 09:35 1560 Sgt. SCOTT D POWERS		
12/07/2012 FILING SUPPLEMENT TO MOTION TO RECONSIDER MOTION TO SUPPRESS FILED BY DEFT 12/11/2012 N/A Defendant's Motion to Reconsider Motion to Suppress is denied.		
Tuesday, April 02, 2013 15:19 1560 Sgt. SCOTT D POWERS		
PRE-TRIAL HAD. AT THE DEFENDANT'S REQUEST, PRE-TRIAL IS HEREBY CONTINUED UNTIL: 4-22-13 AT 8:30 A.M. DEFENDANT IS IN FEDERAL CUSTODY. (JRM)		
Tuesday, July 09, 2013 15:08 0567 Tpr. ELIZABETH A GRABEL		
Case is bound over as of 4/12/13.		
Wednesday, August 07, 2013 17:26 0567 Tpr. ELIZABETH A GRABEL		
07/22/2013 Bindover Costs Have Been Added To The Cost Bill At LorainCounty Common Pleas Court		
Tuesday, September 10, 2013 02:22 0321 Sgt. MATTHEW W DAVIS		
From Lorain County Common Pleas Court Docket: 11/19/2013 (JRM) FURTHER PRETRIAL SET FOR 11/25/13 AT 1:30 PM. DEFENSE COUNSEL MADE AN ORAL MOTION TO WITHDRAW AS COUNSEL. MOTION GRANTED. ATTORNEY MARK AUFDENKAMPE IS APPOINTED. 11/19/2013		
REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0760	DATE: 6/14/2011
APPROVING OFFICER: Sgt. ANTHONY L DECHOUDENS	UNIT NUMBER: 0688	DATE: 1/16/2014

State of Ohio
 HP-24NOT
 10-0157-50
 Rev. 08/01/2003



Ohio State Highway Patrol
 REPORT OF INVESTIGATION
 Investigative Notes

INCIDENT NO: 11 010115 1090	REPORT DATE/TIME 6/14/2011 08:44	PHOTO POUCH NO.
REPORTER COURT REPORTER CERTIFICATION FILED 11/26/2013 (JRM) FURTHER PRETRIAL SET FOR 1/6/14 AT 1:30 PM. JURY/ BENCH TRIAL SET FOR 1/28/14 AT 8:30 AM. TRIAL SET FOR 12/17/13 IS CANCELLED. 11/27/2013 (JRM) NEWLY APPOINTED DEFENSE COUNSEL HAS BEEN PROVIDED COPIES OF THE FOLLOWING, SEE JOURNAL.		
Thursday, October 17, 2013 03:33		0321 Sgt. MATTHEW W DAVIS
No New Info on court docket		
Wednesday, November 13, 2013 01:30		0321 Sgt. MATTHEW W DAVIS
Still no new info on court docket.		
Thursday, December 05, 2013 02:20		0321 Sgt. MATTHEW W DAVIS
No new info. Below is the next scheduled court case: FURTHER PRETRIAL SET FOR 1/6/14 AT 1:30 PM. JURY/ BENCH TRIAL SET FOR 1/28/14 AT 8:30 AM. TRIAL SET FOR 12/17/13 IS CANCELLED		
Thursday, January 16, 2014 02:30		0321 Sgt. MATTHEW W DAVIS
From the Court Docket: FURTHER PRETRIAL SET FOR 1-27-14 AT 1:30 P.M. JURY/BENCH TRIAL REMAINS SET FOR 1/28/14 AT 8:30 A.M. (JRM)		
Sunday, June 22, 2014 01:15		1736 Sgt. Mamere, Brian C
There had been no follow-up completed on this case since 01/16/2014. I took over the Case duties as of June 15, 2014 as the case Sergeant.		
This case was completed on 2/13/2014. A two-day Jury trial was completed and the defendant was found guilty by way of Jury. The sentence imposed on the defendant was to serve a Maximum of 11 years in Lorain Correctional Institute and was ordered to pay a maximum fine of \$10,000.00.		

REPORTING OFFICER: Tpr. CHRISTOPHER H BEYER	UNIT NUMBER: 0700	DATE: 6/14/2011
APPROVING OFFICER: Sgt. ANTHONY L DECHOUDENS	UNIT NUMBER: 0696	DATE: 1/16/2014