

IN THE SUPREME COURT OF OHIO

STATE OF OHIO,	:	
	:	Case No.
Plaintiff-Appellee,	:	
	:	On Appeal from the Geauga
vs.	:	County Court of Appeals
	:	Eleventh Appellate District
CHAD SOUTH,	:	
	:	Court of Appeals
Defendant-Appellant.	:	Case No. 2016-G-0083

**MEMORANDUM IN SUPPORT OF JURISDICTION
OF APPELLANT CHAD SOUTH**

OFFICE OF THE OHIO PUBLIC DEFENDER

FRANCISCO E. LÜTTECKE #0082866
Assistant State Public Defender

250 East Broad Street, Suite 1400
Columbus, Ohio 43215
614-466-5394
614-752-5167 – Fax
Francisco.Luttecke@opd.ohio.gov

COUNSEL FOR APPELLANT

JAMES R. FLAIZ, #0075242
Geauga County Prosecutor

Geauga County Prosecutor's Office
231 Main Street, 3rd Floor
Chardon, Ohio 44024
440-279-2100
440-279-1322 – Fax
James.Flaiz@gcpao.com

PAUL L. SCARSELLA, #0068661
Special Assistant Prosecutor

Ohio Attorney General's Office
150 E. Gay Street, 16th Floor
Columbus, Ohio 43215
614-466-3965

COUNSEL FOR APPELLEE

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EXPLANATION OF WHY THIS IS A CASE OF PUBLIC OR GREAT GENERAL INTEREST AND INVOLVES A SUBSTANTIAL CONSTITUTIONAL QUESTION

There is a strong probability that Chad South is innocent. But believing in his innocence raises difficult questions about practices and procedures frequently seen in criminal investigations and prosecutions. Mr. South's innocence demands confronting how informants are used in our criminal justice system. It forces us to analyze how the testimony of informants is weighed, and how to address law enforcement misconduct. These are uncomfortable questions and issues to face. It is easier to presume regularity and finality. But to do so ignores serious problems that litter Chad South's case which are capable of repetition in many cases across the state.

STATEMENT OF THE CASE AND FACTS

In June of 2015, Chad South was indicted for one count each of conspiracy to commit aggravated murder, aggravated murder, aggravated felony murder, and two counts of kidnapping. The indictment against Chad South was premised exclusively on the anticipated testimony of one prison informant, Richard Carter. The majority of the informant testimony was impossible to corroborate and much of the information provided was thoroughly debunked by investigators. The only pieces of information from Carter's questionable and ever-changing story capable of corroboration were contradicted by the only two disinterested eyewitnesses. Chad South was convicted after a bench trial.

Daniel E. Ott was murdered in the early morning hours of May 26, 2006. Maryann Ricker, Dan's girlfriend, was the only person present at the time of the murder. She woke up to the sounds of someone in the house, and saw a man standing in the doorway holding a shotgun. He was of average height and build, covered in green camouflage. The man asked Dan what his name was, and Dan replied. He ordered them to the floor, duct-taped Dan, and went to leave. Dan broke free and pursued the intruder. Maryann heard a gunshot and ran to a window, where she saw a maroon

Ford Taurus-like car backing out of their driveway. Maryann called 911 and Dan was transported to the hospital where he died. Maryann only saw one person in the home other than her and Dan, and saw no one else in the car.

Detective Joseph Keough investigated the case. He stated a “momentous-type lead” came in August, 2006. Detective Keough was running a search in the Ohio law enforcement gateway, entered Dan Ott’s name and noticed that agent John Paskan had searched for Dan Ott in the system. Paskan, however, was searching for Dan C. Ott, not Dan E. Ott, the victim. Paskan said Dan C. Ott was a longtime auto thief. Detective Keough spoke with Ott who directed him to Logan County Sherriff’s Detective John Stout.

Detective Keough called Logan County, and spoke with Detective Bruglar. Detective Bruglar thought the Ott murder might be related to some of their cases. Detective Stout had put together the auto-theft case involving Joe Rosebrook, Ott, and Curtis Frazier, who had run a multi-million dollar, high-end chop shop. Rosebrook was in prison for trying to have Frazier murdered, because he testified for the State in the chop-shop case. Rosebrook contacted Ott to kill Frazier. Ott agreed, but instead wore a wire and testified against Rosebrook.

The Logan County investigation into Rosebrook, and Logan County law enforcement’s relationships with informants involved in that investigation, predated the murder of Dan Ott. In 2004, Keith Levan was the Logan County Sheriff’s Office Chief Deputy and knew of Detective Stout’s investigation into Rosebrook which resulted in his initial imprisonment. But despite securing a conviction, Logan County continued investigating Rosebrook, primarily through jailhouse informants.

Detective Keough and fellow Geauga County Detective Juanita Vetter met with Frazier in September of 2006. Frazier told detectives about Tommy Scott, who might have information about the murder. Scott was in prison for armed robberies, knew Rosebrook, and had previously worn a

wire to gain information on Rosebrook. Scott was also the father of Frazier's granddaughter, and Frazier's former son-in-law. Frazier also mentioned Terry Current, Tommy Scott's uncle, and a longtime informant for the Logan County Sheriff's Office. Detective Keough admitted he believed that they had shared too much information with Frazier at this meeting.

In October of 2006, Detectives Keough and Vetter travelled with Frazier to interview Scott. The detectives learned that Frazier and Scott were working with Logan County to get information on Rosebrook. Scott's information proved unhelpful. Detective Keough recalled Frazier, not Scott, first mentioning Chad South. Detective Vetter, however, recalled that Scott did not give them Chad South, but rather Scott told them the hitman was recently released from London Correctional, which resulted in a list of about 50 people, including Chad South. Detective Vetter testified that they began cross-referencing that list with anyone who had any prior involvement in Geauga County, and also interviewed a number of inmates at London Correctional. Detective Vetter testified that Chad South had a 2000 traffic stop in Geauga County, so South was interviewed in 2006 in relation to the Ott investigation.

In late-2007, from the Rosebrook lead, Detectives Keough and Vetter crafted a theoretical version of the case, where the intruder in the Ott house was a hired killer looking for Dan C. Ott. Upon realizing he had the wrong Dan Ott, the man tried to escape. It was only when Dan Ott broke free of the binding and pursued the perpetrator, that he was killed.

In 2010, Detective Vetter received a call from Detective Levan, telling her that he had "additional information about Terry Current being housed at London Correctional." After Tommy Scott failed to provide useful information, Geauga County's principal contact on the Rosebrook angle became Terry Current. Current had asked that any compensation for his information go to his nephew, Tommy Scott, rather than himself.

Detective Vetter set up a meeting with Levan and Terry Current. Current was then incarcerated with Chad South. South confided in Current that he was worried about something he'd done. Current told them South had a girl in the car with him when he went to commit the murder, and that her name started with an "A" and could be Amber or Auburn. Detective Vetter testified that they "just needed more information if he was able to provide it" and left Terry Current her number. She followed-up on his information, however, looking for drug addicts or prostitutes with those names that they could connect to Chad South. Detective Vetter found two women named "Amber" but neither had any information and their DNA did not match the cigarette left at the scene. Detective Vetter testified that she received no further helpful information until September of 2010 when Levan called her again, because "there was a informant also within London Correctional that he believed was a credible informant by the name of Richard Carter," but that he would only speak to Levan.

By 2010, Keith Levan was a detective and still used longtime jailhouse informant Terry Current. Levan admitted to using Current numerous times for information and paying him almost \$4,500 over the course of their relationship. Despite this, Current's information never produced an indictment or conviction against Rosebrook. Levan denied that Current was ever paid for his information on the Ott murder.

This was the backdrop to Current setting up a series of meetings between Levan and Richard Carter, an inmate who Current said might know something about a Logan County investigation. Levan was well-versed in the Geauga County investigation, having been informed of it by Detective Vetter. Because Carter would only talk to Levan, Detective Vetter received all of her information through Levan.

Richard Carter was an ex-construction worker who moved to Ohio in 1993. He admitted that he would also steal people's mail and cash their checks and burglarize homes, such that he

spent much of his life in prison, both in Georgia and Ohio. Carter admitted that his criminal record began in 1975, and that the majority of his convictions related to forgery, theft, and receiving stolen property. He was on postrelease control when he testified. Carter was transferred to London Correctional in 2009, while serving a sentence for felonious assault against his wife, receiving stolen property, and forgery. Carter's information guided the investigation into the Ott murder, and he was the State's key witness at trial.

Current introduced Carter to Chad South. Carter stated that he developed a relationship with South, and eventually South began to confide in him about having been questioned in a murder investigation and his concerns about whether you could "remove DNA from an automobile and from vomit in a car." South also told Carter that he hit something with the car as he left, and worried about whether they might match the paint to the car. By trial, Carter's account of what Chad South had told him was a uniform narrative that explained away any inconsistencies by claiming that Chad South's account changed frequently. Both Detective Levan and Richard Carter, however, testified at trial to their meetings regarding the Dan E. Ott murder case. When Levan and Carter were questioned regarding specific meetings, a much more fractured, disparate account emerged, than what Carter testified to at trial.

In total Levan met with Carter seven times between September of 2010 and February of 2011. Over the course of these meeting a large number of details changed and shifted, and many significant details provided were thoroughly debunked by investigators or could not be corroborated in any way. Current set up the meetings between Carter and Levan. Levan paid Carter before some of these meetings, admitting that sometimes he would put money on Current's account, or another inmate's account, because Carter owed fines and court costs. Chad South was released from prison in October of 2010. In the run-up to his release, Carter met with Levan, urging him to act quickly because Chad South was going to fake his own death once he got out.

Despite Chad South having left prison, Carter continued providing more information about Chad South's confessions to him about the Ott murder, presumably the work of delayed recollection. Their sixth interview, over a month after Chad was released, was the first time Carter told Levan that Chad was worried about someone named "Mary."

On February 14, 2011—almost four months after Chad had been released—Levan put \$40 into Richard Carter's personal account and \$25 on his phone. The very next day, Terry Current contacted Levan and said he could now solve both the Ott and Rosebrook cases. Levan interviewed both Carter and Current that day, recording neither interview. Now, for the first time, Carter and Current told Levan about the man who ran across Chad South covered in blood and changing in his driveway. This was also the first time that Carter and Current reported that Chad feared that "Mary" might be able to identify his voice. Levan called Detective Veters to let her know about this information.

At trial, Carter said he and South talked about this three times a week, and South added new information each time. Initially, South told Carter that he'd killed a man with a shotgun, that he'd turned around and the gun went off and the man had bled to death. Carter said the story changed as South got more comfortable. South told Carter that a girl was with him and vomited in the car and that the girl was now in a safe house in Alabama or Huntsville. Carter claimed that Rosebrook had hired South to go kill someone that testified against him in a car-rig case. South also told Carter that there were two people, and he "duct taped them up" but afterwards realized he had the wrong person because the man wasn't old enough. Carter claims South told him that when he was walking away the man got loose, came after him, and the shotgun went off. He claimed South told him he blew the man's head off. South told Carter that after he left he was covered in blood, he'd gotten in the car, the girl vomited, and then they took the car to a junkyard. He said South had pulled over a few miles from the scene to take his bloody clothes off and put

the shotgun and camouflage in the trunk, when he was startled by a farmer. Carter reiterated that the details were told over time, and that all changes in the accounts he gave related exclusively to South changing his story.

Carter never met with any law enforcement from Geauga County until September of 2011 when he got out of prison. Detective Veters attempted to corroborate Carter's information regarding certain letters, the murder weapon, and what happened to the car used in the murder, and the car hitting something as it fled. She was unable to corroborate any of these details despite numerous investigative steps. Maryann Ricker was unable to identify Chad South's voice.

Detective Veters conducted a series of interviews which revealed that the day before the murder, Chad South had been arrested in Clark County—he lived in the Dayton area during the time of the murder—at 2:15 p.m., being released later that same day.

Eventually, Detective Veters did locate a man named Eli Yoder who lived two or three miles down the road from Dan E. Ott's home. Not questioned until January of 2015, Eli still remembered the shooting and what he saw one morning right around that day. Eli saw a car he'd never seen before parked by the oil well by his driveway. He approached the person sitting in the car, who he described as a white male in his 20s, 30s, or 40s. He asked the man if he was okay, and the man said he was. Eli testified that there were no passengers in the car, and that the man did not exit the car or change clothes.

Despite this litany of confessions South made, none of the physical, scientific, or trace evidence collected at the scene was ever connected to Chad South. Chad South had one witness testify on his behalf. That witness did not, however, appear in court for his bench trial. After the efforts to secure Charles Jason Harvey were unsuccessful, the trial court accepted and admitted the testimony Harvey presented at the misconduct hearing “for whatever probative value it might have.” At that hearing Harvey testified that he is a self-employed contractor working in

construction, roofing, and siding. Harvey admitted to serving 18 months in prison for a 2010 assault conviction in Montgomery County. Harvey knew Chad South because South worked for him for eight or ten months in 2006.

On May 26, 2006, Harvey's wife gave birth to their child. It was a scheduled birth, and his wife and he were in the hospital from about 9 a.m. to 5 p.m. that day. Harvey was then running a roofing crew that included Chad South, Chad Malay, and himself. Malay worked for Harvey for 11 years, having left his employ a month before Harvey testified at the hearing.

Harvey testified that although he was at the hospital, South was at work that day. Harvey testified that he sent Malay and South to work, and that Malay could not have worked the roofing job by himself, nor was he allowed to do so. Malay also visited Harvey and his wife at the hospital after work that day. Additionally, Harvey testified that South had missed the previous day of work, and Harvey would have fired South if he had missed a second day in a row. Harvey acknowledged that he had no paperwork to support his testimony, but was confident that if South had missed the day at work, he would have been fired, and Harvey would recall dealing with that aggravating situation the day his child was scheduled to be born.

Harvey was insistent that Chad South was innocent, adding that although he did not like South at all, he knew he was at work that day and calling the State's case "a big run around" and "a circus." He reiterated that he felt Detective Vetter tried to influence his testimony, adding that the detectives "should be on trial."

After a four day trial, the trial court acquitted South of conspiracy and both counts of aggravated murder, but convicted him on two counts of the lesser included offense, murder, and the related gun specifications. The trial court also convicted on two counts of kidnapping. At sentencing, Chad South was sentenced to 28-years-to-life in prison. *Id.*

ARGUMENT IN SUPPORT OF PROPOSITIONS OF LAW

First Proposition of Law:

A court can presume prejudice from the cumulative effects resulting from law enforcement engaging in misconduct during an investigation.

Before trial, Chad South filed a Motion to Dismiss for Government Misconduct. A hearing was held on the matter.

At the hearing, Jason Harvey testified he felt Geauga County detectives worked to intimidate him from testifying for South. Specifically, detectives told him not to get involved, to stay out of trouble, and discussed the strength of their case while also telling Harvey of the possibility for perjury charges. Harvey testified that detectives spoke to the mother of his child and told her that he was involved in a murder investigation, aggravating an already sensitive custody situation. Harvey also reported that after he executed an affidavit, detectives contacted him repeatedly via text and phone asserting that the signature was not his. Harvey contacted detectives and told them they had successfully intimidated him from participating in the case. Harvey also testified that he would not return to court and testify in this case, felt detectives tried to influence his testimony, and that he was fearful of what detectives could do to him.

Also at the hearing, Detective Vetter denied that she had ever spoken to Chad Malay, Chad South's only potential alibi witness for the time of the crime. Defense counsel then played a recorded telephone conversation between Detective Vetter and Terry Current where she stated "He covered for him when we talked to him." Detective Vetter admitted it was her voice, and that "we" would be her and Detective Calandra, and the "he" she would assume was Chad Malay.

Detective Vetter also searched Chad South's jail cell for correspondence with Rosebrook while he was housed at the Lake County Jail. Though nothing relevant was found, Detective Vetter

did review all of South's paperwork, though she denied seeing any of his legal paperwork. Detective Vetter gave copies of all of the paperwork to the prosecution.

In its decision on the motion to dismiss, the trial court concluded that "the State has acted inappropriately in some instances." The trial court noted that detectives had pressured witnesses and their relatives by telling them they were in danger. The trial court also expressed concern regarding the treatment of Jason Harvey, an alibi witness, noting that after he had affirmed that the affidavit signature was his, there was no reason for detectives to continue contacting him. The trial court also had "concerns" about the search of South's cell, adding:

[T]he officer copied the papers and documents found within the jail cell, many of which were clearly Mr. South's notes regarding his case and defense, and sent copies to the Prosecutor. It is noted that neither the officer nor the State's counsel offered any explanation or justification as to why it would be proper or appropriate for the officer to make copies of Mr. South's personal notes, much less share those copies with the Prosecutor.

The trial court concluded that although it was of the opinion that "some of the actions of the State have been inappropriate and inexcusable" it was not so outrageous or egregious that South had been denied due process or a fair trial was impossible, and overruled the motion.

The Eleventh District ruled that despite Jason Harvey not showing up at trial, the trial court's admission of his testimony at the misconduct hearing cured any due process concerns. *South* at ¶ 45. The Eleventh District also held that because there was no evidence concerning what Detective Vettters said to Malay, outrageous conduct could not be established. The Eleventh District also determined that Mr. South was not denied a fair trial by the search of his cell and copying of his notes, because the papers were personal letters, and personal notes of the recorded interviews of Richard Carter, and were not covered by attorney-client privilege.

The investigation into Chad South's case included improper actions taken towards potential witnesses, the delivery of personal notes from Mr. South's jail cell to prosecutors, and a police

detective who denied speaking to an alibi witness until a recording undercut that representation. This Court should accept this case to determine whether prejudice may be presumed from the cumulative effects of law enforcement misconduct during an investigation.

Second Proposition of Law:

Even absent a proffer, if the appellate record in its entirety demonstrates what a defendant sought to establish, a court may review the raised error for prejudice. *State v. Washington*, 137 Ohio St.3d 427, 2013-Ohio-4982, 999 N.E.2d 661; *State v. Doyle*, 4th Dist. Pickaway No. 04CA23, 2005-Ohio-4072; *State v. Archibald*, 11th Dist. Lake Nos. 2006-L-047, 2006-L-207, 2007-Ohio-4966.

As trial approached, the parties addressed several questions regarding impeachment of witnesses and the need for transcriptions of recordings and deposition. Trial counsel timely requested transcriptions be provided at the State's expense. The trial court indicated that it would not provide transcriptions but would allow the parties to play relevant portions of recordings to the witnesses. Defense counsel stated that it was dedicating four people to identify and prepare the recordings for such use a trial. By trial, however, the trial court had completely reversed course on its prior decision, and repeatedly denied the defense's requests to use recorded statements to impeach witnesses or refresh their recollection.

The court denied defense counsel's request to refresh Detective Keough's recollection with his recorded interview of Tommy Scott. It denied counsel's request to play a telephone call from Terry Current to Detective Levan to refresh the recollection and potentially impeach Levan. This initial holding with respect to Levan allowed the detective incredible latitude in his later testimony as his lack of recollection could not be addressed, and the detective repeatedly responded that he did not remember and, absent listening to the interview, he could not answer numerous questions. Similarly, during Richard Carter's testimony the trial court first cut-off counsel's impeachment of Carter's representation that he worked in the law library based on relevance and later, the trial court reiterated that no recordings would be played to refresh Carter's recollection or to impeach

him. Counsel was able to refresh Carter's recollection with the transcript of his deposition, counsel did not have this luxury with Detectives Keough or Levan.

When cross-examining Detective Vetter, the trial court allowed her to listen to a recorded interview to refresh her recollection only after her recollection was not refreshed by an unofficial transcript. By then, however, trial counsel's cross-examinations of Detectives Keough and Levan, as well as key informant Richard Carter had been thoroughly hamstrung by the trial court's unanticipated reversal regarding transcriptions, recordings, and impeachment.

Faced with the possibility that the trial court improperly curtailed Chad's ability to cross-examine the State's witnesses, the Eleventh District stated:

While cross-examining Detectives Keough, Detective Logan, and Carter, defense counsel sought to refresh their memories with statements other prison informants made during prior interviews. The trial court did not allow this line of questioning. Without reaching the propriety of these rulings, appellant failed to proffer the expected responses. Accordingly, appellant failed to show prejudice.

State v. South, 11th Dist. Geauga No. 2016-G-0083, 2017-Ohio-5636, ¶ 51, citing *State v. Archibald*, 11th Dist. Lake Nos. 2006-L-047, 2006-L-207, 2007-Ohio-4966, ¶ 43. Notably, in *Archibald* the Eleventh District faced an issue for which there was no evidence presented, proffered or otherwise on the issue raised. *Archibald* at ¶ 43-44.

The right to effective cross-examination includes the right to impeach a witness. *State v. Green*, 66 Ohio St.3d 141, 147, 1993-Ohio-26, 609 N.E.2d 1253. Effective cross-examination was of paramount importance in this case, as it hinges on the credibility of informants and law enforcement, as well as the recollections of both regarding past interviews and representations. When the trial court refused to comply by the rules it had previously set forth, it gravely curtailed Chad South's ability to cross-examine the witnesses against him.

But the Eleventh District avoided ruling on this issue because no proffer was made. The lack of such a proffer should not preclude review of the trial court's decisions with regards to

cross-examination when the record and the questions themselves evidence what would have been proffered. Regarding Carter's testimony, a full cross-examination with the benefit of impeachment recordings was filed with the trial court in support of Chad South's Motion to Dismiss and formed part of the appellate record. Moreover, many of the questions asked by defense counsel on cross-examination evidenced precisely the contradictory information counsel purported the recordings would demonstrate. The questions themselves demonstrate what impeachment would have revealed, and what would have been proffered.

In *Archibald*, the Eleventh District acknowledged that its review of the record revealed no evidence concerning the evidence challenged on appeal. *Archibald* at ¶ 44. Chad South, and all criminal defendants across Ohio, are owed a similarly complete review of the record by courts of appeal. Just as courts are able to review the entirety of the record in other instances, there is no reason why a court of appeals should avoid reviewing an issue when the record belies any concerns regarding proffers. *See generally State v. Washington*, 137 Ohio St.3d 427, 2013-Ohio-4982, 999 N.E.2d 661, ¶ 24 (court must review entire record when analyzing merger); *State v. Doyle*, 4th Dist. Pickaway No. 04CA23, 2005-Ohio-4072, ¶ 11 (reviewing entire record to analyze waiver of right to counsel). This Court should accept this issue to determine whether an appellate court may avoid review of an assignment of error because a proffer was not made, when the record in its entirety evidences what would have been proffered.

Third Proposition of Law:

A trial court must state that it viewed an informant's testimony with grave suspicion and weighed it with great caution, and explain how these considerations were overcome in a specific case, when issuing a verdict and judgment in a bench trial. *United States v. Griffin*, 382 F.2d 823, 828-829 (6th Cir.1967); R.C. 2923.01(H)(1), (2); R.C. 2923.03(D).

The case against Chad South was premised exclusively on informant testimony: "the state relied heavily upon prison informant Carter's testimony." *South* at ¶ 20. And the trial court

acknowledged, “[t]he State has not provided this Court with any physical or scientific evidence that corroborates Mr. Carter’s testimony. The State has provided some limited evidence that supports some of Mr. Carter’s testimony.” (May 2, 2016 Decision and Verdict at 4).

It is well established that the testimony of jail or prison informants is unreliable absent independent, objective corroborating evidence. *See United States v. Bernal-Obeso*, 989 F.2d 331, 333-334 (9th Cir.1993); Comment: The Faces of Wrongful Conviction Symposium: Beyond Unreliable: How Snitches Contribute to Wrongful Convictions, 37 Golden Gate U.L. Rev. 107; Rob Warden, The Snitch System: How Snitch Testimony Sent Randy Steidl and Other Innocent Americans to Death Row, Center on Wrongful Convictions, Northwestern University School of Law, 2004, available at <http://www.law.northwestern.edu/legalclinic/wrongfulconvictions/documents/SnitchSystemBooklet.pdf> (finding snitch cases account for 45.9% of all death row exonerations, making snitch testimony the leading cause of wrongful convictions in the United States).

In Ohio, by statute, accomplice testimony requires a specific jury instruction. R.C. 2923.01(H)(1), (2); R.C. 2923.03(D). Both statutes state that a jury shall be instructed that: “The testimony of an accomplice does not become inadmissible because of his complicity, moral turpitude, or self-interest, but the admitted or claimed complicity of a witness may affect his credibility and make his testimony subject to grave suspicion, and require that it be weighed with great caution.” *Id.* *See also* 2-CR 409 OJI CR 409.17. The Sixth Circuit Court of Appeals has found plain error in a court’s failure to give a special cautionary instruction to the jury as to the credibility of the informant where warranted. *United States v. Griffin*, 382 F.2d 823, 828-829 (6th Cir.1967).

Informant testimony is as unreliable, or potentially more unreliable, than accomplice testimony. The protections against accomplice testimony are equally necessary in an informant

testimony case with minimal corroboration. Admittedly these protections are cast in the form of jury instructions, and Chad South was tried by the bench. Nevertheless, this Court should accept this case to determine whether a trial court must state in its decision and judgment that it viewed an informant's testimony with grave suspicion and weighed it with great caution, and outline how these considerations were overcome in a given case.

CONCLUSION

This case involves substantial constitutional questions, as well as questions of public or great general interest. For all the above reasons, Mr. South respectfully requests the court to accept jurisdiction and reverse the decision of the court of appeals.

Respectfully submitted,

OFFICE OF THE OHIO PUBLIC DEFENDER

/s/ Francisco E. Lüttecke

FRANCISCO E. LÜTTECKE #0082866

Assistant State Public Defender

250 East Broad Street, Suite 1400

Columbus, Ohio 43215

614-466-5394

614-752-5167 – Fax

Francisco.Luttecke@opd.ohio.gov

COUNSEL FOR APPELLANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MEMORANDUM IN SUPPORT OF JURISDICTION OF APPELLANT CHAD SOUTH was forwarded by regular U.S. Mail to:

James R. Flaiz, Prosecutor
Geauga County Prosecutor's Office
231 Main Street, 3rd Floor
Chardon, Ohio 44024

Paul L. Scarsella, Special Assistant Prosecutor
Ohio Attorney General's Office
150 E. Gay Street, 16th Floor
Columbus, Ohio 43215

this 14th day of August, 2017.

/s/ Francisco E. Lüttecke
FRANCISCO E. LÜTTECKE #0082866
Assistant State Public Defender

COUNSEL FOR APPELLANT

IN THE SUPREME COURT OF OHIO

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APPENDIX TO

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