

18-0849

Reno A. Woodard

(NAME AND NUMBER)

Grafton Correctional Institution  
 2500 S. Avon-Belden Road  
 Grafton, Ohio 44044

Petitioner,

-VS-

L. Eppinger

(WARDEN)

Grafton Correctional Institution  
 2500 S. Avon-Belden Road  
 Grafton, Ohio 44044

: Case No. CR-435-414,  
 CR-435-733,  
 CR-54201.

:

: PETITIONER RENO A. WOODARD  
 (NAME)

: HABEAS CORPUS PETITION  
 TO OHIO REVISED CODE 2725.ET SEQ.

:

:

Now comes the Petitioner Reno A. Woodard, in pro se and respectfully submits the following Petition for Writ of Habeas Corpus with Memorandum in Support pursuant to Ohio Revised Code 2725. et seq. This Petition is verified pursuant to Ohio Revised Code 2725.04 by attached supporting commitment papers and additional and additional exhibits. Petitioner respectfully prays for an ORDER from this Court granting Writ.

Additionally, Petitioner requests this Court issue an ORDER releasing him on bail, pursuant to Ohio Revised Code 2725.18, pending disposition of this petition for habeas corpus relief. The relief requested is so prayed for in the interest of justice.

Respectfully submitted,



FILED

JUN 18 2018

CLERK OF COURT

SUPREME COURT OF OHIO MEMORANDUM IN SUPPORT OF HABEAS CORPUS

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Memorandum In Support of Habeas Corpus

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## EXHIBITS

### **Exhibit-A**

Journal Entries

Autopsy Report

Coroner's Examination report.

Reno A. Woodard

(NAME AND NUMBER)

Grafton Correctional Institution  
2500 S. Avon-Belden Road  
Grafton, Ohio 44044

Petitioner,

-vs-

L. Eppinger

(WARDEN)

Grafton Correctional Institution  
2500 S. Avon-Belden Road  
Grafton, Ohio 44044

Respondent.

: Case No. CR-435-414,  
CR-435-733,  
CR-54201.

: PETITION FOR  
WRIT OF HABEAS CORPUS

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PETITIONER RENO A. WOODARD HABEAS CORPUS  
(NAME)  
PETITION PURSUANT TO OHIO REVISED CODE 2725. ET SEQ.

---

Respectfully submitted,

Reno A. Woodard

(NAME AND NUMBER)

Grafton Correctional Institution  
2500 S. Avon-Belden Road  
Grafton, Ohio 44044

## **I. STATEMENT OF THE CASE/FACTS/CLAIMS**

1. Trial court lacked subject-matter jurisdiction,

2. No Complaint

(On all these journal entries)

CR-435414,

CR-435733,

CR-54201.

3. Newly Discovered Evidence.

(The autopsy report shows there were no rape in the case)

The coroner's report also shows there no rape).

## **II. GROUND ONE FOR RELIEF WITH SUPPORTING ARGUMENT**

Petitioner is unlawfully restrained of his liberty by the

Warden of the State penitentiary at Grafton Correctional  
Institution in the State of Ohio. A copy of the commitment or



STATE OF OHIO, CUYAHOGA COUNTY SS. IN THE COURT OF COMMON PLEAS

STATE OF OHIO  
VS.

PLAINTIFF

DEFENDANT

TO-WIT: JANUARY 07  
NO. CR 435414

JANUARY TERM, 2004  
2004

RENO WOODARD  
3352 E. 140TH STREET  
CLEVELAND, OH 44105  
07/23/58  
ITN: 100929CB

INDICTMENT AGG MURDER W/FMS/RVOS/NPC

JOURNAL ENTRY

DEFENDANT IN COURT WITH COUNSEL DAVE GRANT AND JIM MCDONNELL. PROSECUTING ATTORNEY SAL AWADALLAH AND COURT REPORTER TOM STRATTON PRESENT. DEFENDANT WAS ADVISED OF ALL CONSTITUTIONAL RIGHTS AND PENALTIES.

ON RECOMMENDATION OF THE PROSECUTOR COUNT 2 AMENDED BY DELETION OF FELONY MURDER SPEC ONLY.

DEFENDANT RETRACTS FORMER PLEA OF NOT GUILTY AND ENTERS A PLEA OF GUILTY TO AGGRAVATED MURDER WITH RVOS/NPC RC 2903.01 AGGRAVATED FELONY, UNCLASSIFIED, (SENATE BILL 2).

COURT FINDS DEFENDANT GUILTY. COUNT 1 IS NOLLED.

THE COURT CONSIDERED ALL OF THE REQUIRED FACTORS OF THE LAW.

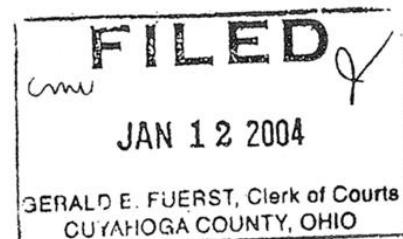
THE COURT FINDS THAT PRISON IS CONSISTENT WITH THE PURPOSES OF R. C. 2929.11.

THE COURT IMPOSES A PRISON TERM AT LORAIN CORRECTIONAL INSTITUTION FOR LIFE, WITH POSSIBILITY OF PAROLE AFTER 20 YEARS, TO RUN CONSECUTIVE TO CR 435733.

DEFENDANT TO RECEIVE 307 DAYS JAIL TIME CREDIT, TO DATE.

POST RELEASE CONTROL IS PART OF THIS PRISON SENTENCE FOR THE MAXIMUM PERIOD ALLOWED FOR THE ABOVE FELONY (S) UNDER R. C.2967.28.  
COSTS ARE WAIVED.

DEFENDANT STIPULATES TO BEING A SEXUAL PREDATOR.



01-07-2004  
P-S EDB 01/08/04 14:54

JUDGE CHRISTOPHER A BOYKO

*Christopher A. Boyko*

COPIES SENT TO:

Sheriff *ABee 1/12/04*

Defendant \_\_\_\_\_

Other *LORCI & cost*

STATE OF OHIO,  
CUYAHOGA COUNTY

SS. IN THE COURT OF COMMON PLEAS

STATE OF OHIO  
VS.

PLAINTIFF

TO-WIT: JANUARY 07  
NO. CR 435733JANUARY TERM, 2004  
2004

DEFENDANT

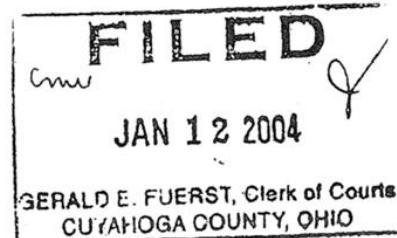
INDICTMENT RAPE W/RVOS W/NPC

RENO WOODARD

## JOURNAL ENTRY

THE DEFENDANT HEREIN, HAVING ENTERED A PLEA OF GUILTY TO OR BEEN CONVICTED OF A SEXUALLY ORIENTED OFFENSE ON A FORMER DAY OF COURT, WAS IN OPEN COURT THIS DAY, WITH COUNSEL PRESENT. THE COURT FINDS AND DETERMINES THAT UPON HEARING HELD PURSUANT TO R. C. 2950.09 (B), THE DEFENDANT IS HEREBY ADJUDICATED AND STIPULATED TO BE A SEXUAL PREDATOR. A DNA SPECIMEN IS ORDERED, AND ADDRESS REGISTRATION AND VERIFICATION IS ORDERED EVERY 90 DAYS FOR LIFE, AND ANNUALLY FOR ANY REMAINING APPLICABLE PERIOD AS SET FORTH BELOW AFTER ANY TERMINATION OF THE DEFENDANT'S STATUS AS A SEXUAL PREDATOR;

WHEREUPON, THE COURT NOTIFIED THE DEFENDANT OF ALL REGISTRATION DUTIES PURSUANT TO R. C. 2950.03 AND HEREBY ORDERS THE SHERIFF TO SUBMIT TO THE COURT A PHOTOGRAPH AND THE FINGERPRINTS OF THE DEFENDANT AND TO PERFORM ALL DUTIES CONTAINED IN CHAPTER 2950 OF THE REVISED CODE.

01-07-2004  
ADDN EDB 01/08/04 14:43

JUDGE

CHRISTOPHER A BOYKO

COPIES SENT TO:

 Sheriff Asa 1/13/04  
 Defendant \_\_\_\_\_

 Other \_\_\_\_\_

LORCI \_\_\_\_\_

STATE OF OHIO, I. SS.  
CUYAHOGA COUNTY

**STATE OF OHIO**

VS.

Reno Woodard

**PLAINTIFF**

**DEFENDANT**

## JOURNAL ENTRY

TO-WIT: May 8, 1981  
CR 54201

TERM. 19

RECEIVED FOR PILING

MAY 20 1981

GERALD E. FUERST, CLERK  
SY D.A. 777.

## Aggravated Burglary

## Grand Theft

## **Felonious Assault**

Now comes the Prosecuting Attorney on behalf of the State of Ohio and defendant Reno Woodard in open court with his counsel present and was fully advised of his constitutional rights.

Thereupon said defendant retracts his plea of not guilty heretofore entered, and for plea to said indictment says he is guilty of Aggravated Burglary, RC 2911.11, as charged in count 1, and guilty to Felonious Assault, RC 2903.11, as charged in count 3. On recommendation of the Prosecuting Attorney remaining count two is nolle prosequi, which also is withdrawn.

which plea, on the recommendation of the Prosecuting Attorney is accepted by the court. Thereupon the court inquired of the said defendant if he had anything to say why

judgment should not be pronounced against him; and having nothing but what he had already said and showing no good and sufficient cause why judgment should not be pronounced:

It is therefore ordered and adjudged by the court that defendant R. W. L. ... be imprisoned.

Judge Frank J. Gormna  
ca/5-14-81  
n-5-14

C OF C 124 D

## JUDGE

F. J. Gordon  
- 134 - 162

THE STATE OF OHIO } I: GERALD E. FUERST, CLERK OF  
Cuyahoga County } SS. THE COURT OF COMMON PLEAS  
HEREBY CERTIFY THAT THE ABOVE AND FOREGOING IS TRULY  
TAKEN AND COPIED FROM THE ORIGINAL  
NOW ON FILE IN MY OFFICE.  
WITNESS MY HAND AND SEAL OF SAID COURT THIS 2  
DAY OF January A.D. 20 12  
GERALD E. FUERST, Clerk  
By *R. Cashier* Deputy



# Ohio Department of Rehabilitation and Correction

1050 Freeway Drive North  
Columbus, OH 43229

Ted Strickland, Governor

[www.drc.state.oh.us](http://www.drc.state.oh.us)

Terry Collins, Director

April 26, 2007

Reno Woodard #A461073  
TCI

Dear Mr. Woodard:

I am in receipt of your letter regarding your sentence computation. Under number R116303, you were admitted on 5-18-1981 and you had three concurrent charges; Felonious Assault, and two counts of Aggravated Burglary.

Unfortunately, because this is such an old number I'm not able to tell you your sentencing date. If you contact the Cuyahoga County Clerk of Courts they should be able to give you that date.

I hope that I've been able to answer most of your questions.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Hawke".

D. Hawke  
Bureau of Sentence Computation

cc: file

cause of detention of petitioner is attached herein and marked  
Exhibit "A" (if the commitment or cause of detention cannot  
be procured without impairing the efficiency of the remedy,  
that fact should be stated). The imprisonment of Petitioner  
is without legal Authority wherefore, petitioner Prays that  
a Writ of Habeas Corpus be issued to said name and that he may  
be dismissed from illegal confinement.

### **III. CONCLUSION**

In closing the petitioner relief sought is for a Writ to be granted and this case be vacated due to the merits speak of the **lack of**, subject-matter jurisdiction.

**IV. AFFIDAVIT OF VERIFICATION IN SUPPORT OF PETITION FOR WRIT OF  
HABEAS CORPUS PURSUANT TO OHIO REVISED CODE 2725.04**

I Reno A. Woodard, affiant and Petitioner, having been duly warned and cautioned, and who is competent to testify to same, do hereby state under penalty of perjury, that based on personal knowledge and belief the following below is true and correct.

1. The trial court lacked subject-matter jurisdiction by convicting Mr. Woodard without an criminal complaint.

*Reno A. Woodard*

2. Petitioner now hereby comes with newly discovered evidence.

**NOTARY PUBLIC**

Sworn to and subscribed before me a Notary Public in the State of Ohio Lorain County  
this 10<sup>th</sup> day of June, 2018



*Elizabeth Osborne*

CORONER'S OFFICE, CUYAHOGA COUNTY, OHIO

## Autopsy Protocol

NAME Sonya Lanise Smith

CASE NO. 248207

AUTOPSY NO. M-78147

DATE March 8, 2003

ELIZABETH K. BALRAJ, M.D.  
CORONER

**PURSUANT TO SUP.R. 45(C)(2), THIS  
DOCUMENT OR PORTIONS OF THIS  
DOCUMENT ARE NOT AVAILABLE  
THROUGH REMOTE ACCESS.**