

**IN THE OHIO SUPREME COURT  
FRANKLIN COUNTY, OHIO**

**JEFF SQUIRES**  
Petitioner,

CASE NO.: 2022-0974  
JUDGE: \_\_\_\_\_

**-VS-**

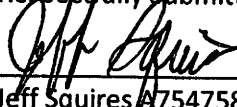
**RESPONSE TO PROSECUTOR  
APPELLATE CASE NO.: 18-CA-108071  
ORIGINAL CASE NO: CR-18-628610-A**

**State of Ohio,**  
Appellee

In response to the argument the Prosecutor raised and used online.

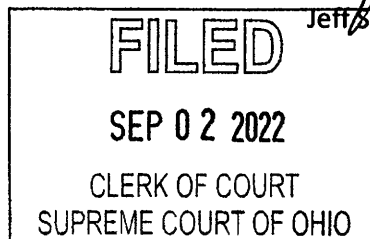
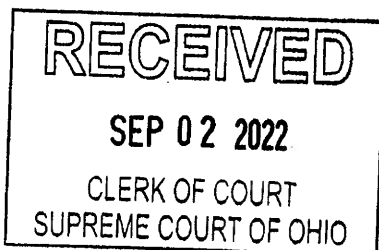
- 1) The Court purposefully overcharged me with 10 counts of rape. Only 1 date was given when a supposed rape occurred. Therefore, the charge legally should have been for rape/g.s.i. on the first and only date given by the prosecution. Nobody can legally be convicted of a supposed crime that occurred on an unknown date and a unknown time.
- 2) My attorney was ineffective for not raising the issue that only one date and time were ever submitted into evidence, therefore only 1 count of rape and G.S.I. should have been charged.
- 3) My attorney was also ineffective for not raising the issue that I have never been charged with a felony, never had a domestic violence charge and had an honorable discharge with many good conduct awards. I was also promoted to a supervisor at the post office due to my exceptional performance reviews. I have no history at all of sexual misconduct or any type of violence towards another person.
- 4) The Ohio Supreme Court is mandated to give considerable leniency to Pro Se litigants Any motion filed is supposed to be recast in order to allow the motion to be ruled on based on its merits.
- 5) My attorney was ineffective as the judges for the second appeal were all female, which caused a prejudicial and biased decision. The one female judge that ruled on the first appeal and approved a sentence reduction was obviously pressured by the other 2 female Judges on the second appeal to concur with their opinion, thus causing a double jeopardy violation.

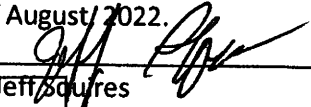
Respectfully Submitted,

  
Jeff Squires #754758  
P.O. Box 8107  
Mansfield, Oh 44801

**CERTIFICATE OF SERVICE**

A copy of this motion was sent to the Ohio Supreme Court on this \_\_\_\_ day of August/2022.



  
Jeff Squires

**State of Ohio**  
**Richland County**

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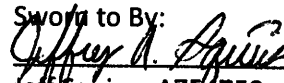
**Affidavit of Facts**  
**For Jeff Squires**

I, Jeff Squires do hereby depose that the following statements are truthful under the penalties for perjury in the State of Ohio. I do hereby depose:

- 1) My name is Jeff Squires and I was born April 23, 1961. I currently reside at Richland Correctional. My inmate id number is A754758. I have been incarcerated since December 3, 2018.
- 2) In case number 18-CR-00 I was incorrectly charged and sentenced for sexual misconduct with a mentally handicapped person. I never had a felony charge in my life and had worked at the Post Office for 13 years and retired from the Navy after 16 years.
- 3) The supposed victim was @39 years old at the time and suffered from a mild case of Downs Syndrome. She was fully functional as an adult and could perform all of the 7 daily activities which indicate that she is not mentally handicapped. My Attorney was ineffective for not challenging this.
- 4) The victim had a job for over 5 years, drank beer and even had a boyfriend.
- 5) I was dating the victim's mother and we were all living together. My relationship with her mother had deteriorated and we have no physical intimacy for over a year.
- 6) Many times, the suppose victim came in my room or the living room and would snuggle with me. We had a very affectionate bound and loved each other My Attorney was ineffective for not challenging this.
- 7) One evening, we started massaging each other, which led to kissing. She then to my surprise yelled "oh, I am so wet", then tore off her clothes and we had sex. The sexual activity was between 2 consenting adults and was initiated by the supposed victim. My Attorney was ineffective for not challenging this.
- 8) When the victim's mother found out, she was insanely jealous and filed charges on me.
- 9) The supposed victim's mother had total control over her daughter for many years and forcefully coerced her to say what her mom told her to, in order to punish me. My Attorney was ineffective for not challenging this.
- 10) The mother wrote a letter that she claimed her daughter wrote to further frame me for a crime I did not commit.
- 11) The State of Ohio charged me with 3 counts when they never specified the supposed 2 other times myself and the victim supposedly had sex. My Attorney was ineffective for not challenging this.
- 12) The State of Ohio also failed to have an independent Psychiatrist perform an exam on the victim in order to affirm her mental capacity and intellectual level. The victim could speak and act intelligently and knew right from wrong.
- 13) As the victim had not been properly schooled or educated by her mother, she lacked the capacity to perform well on written tests. Her mental level may have been lacking, but to any person that talked with her, she displayed a lot of common sense and knew right from wrong. My Attorney was ineffective for not challenging this.
- 14) The supposed victim would often argue when she did things her mom did not like. The victim would say "I am almost 40 years old and I can do what I want". My Attorney was ineffective for not challenging this.
- 15) Had the State of Ohio had an independent psychiatric examiner question the victim, I would not have been charged. My constitutional rights have been severely violated. Attorney was ineffective for not challenging this.

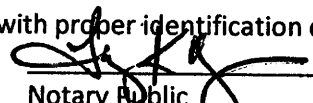
- 16) The Court purposefully overcharged me with 10 counts, when the record only showed that the supposed rape/g.s.i. occurred on 1 date and time. No other dates and times were in the Indictment; therefore I should have only been indicted on 1 charge for the date the incident supposedly occurred.
- 17) My Attorney was ineffective for not raising the fact that I have never been charged with a sexual offense or even a domestic violence incident. If I had not slept with my girlfriend's 39-year-old daughter, which made her mom upset, no charges would have been made at all.
- 18) My Attorney was also ineffective for not raising the fact that I had several good conduct awards and an honorable discharge from the Navy after 16 years.
- 19) My Attorney was ineffective for not stating that I was promoted to Supervisor at the Post Office after many years of positive reviews.
- 20) My Appellate Attorney was incompetent for letting 3 female Judges rule on my Appeal. One of the female Judge who had previously ruled in my favor, changed her ruling on the second appeal, creating a double jeopardy violation.

These statements of facts are now certified to be statement of truth under the penalties of perjury in the State of Ohio.

Sworn to By:  
  
Jeff Squires A754758

**NOTARY PUBLIC:**

This statement has been sworn to and subscribed before me, with proper identification on this 29 day of August, 2022.

  
Notary Public

