

IN THE SUPREME COURT OF OHIO

State of Ohio

Appellant

v.

Brian K. Siler

Appellee

On Appeal from the Ashland County  
Court of Appeals, Fifth Appellate District

Case No. 2006-0185

Appellate No. 02COA-028

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MOTION TO ADMIT ATTORNEY ALICE ANNA PHILLIPS PRO HAC VICE

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FILED

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MARCIA J. MENGEL, CLERK  
SUPREME COURT OF OHIO

## MEMORANDUM IN SUPPORT OF MOTION

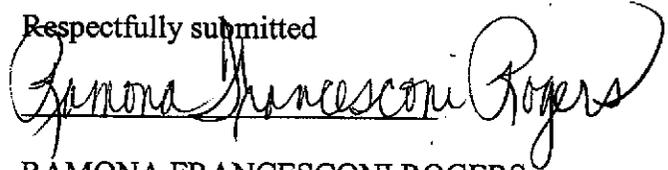
Alice Anna Phillips is a senior attorney for the American Prosecutors Research Institute's National Center for Prosecution of Child Abuse and National Child Protection Training Center in Alexandria, Virginia. Formerly, she was an assistant prosecuting attorney in Michigan, where she remains a member in good standing of the Michigan bar.

Since joining the American Prosecutors Research Institute, Ms. Phillips has specialized in training, research and publishing on child abuse and neglect issues, particularly involving what young children understand about court. She frequently lectures to prosecutors, judges, and law enforcement around the country about children and the effect of Crawford v. Washington, (2004) \_\_\_ U.S. \_\_\_, 124 S. Ct. 1354 on the admissibility of their statements. She has successfully co-authored an amicus briefs before the Minnesota Supreme Court in Bobadilla v. Minnesota, 709 N.W.2d 243 (Minn. 2006), before the Massachusetts Supreme Court in Commonwealth v. DeOliveira, 447 Mass. 56 (2006) , and has a brief pending before the Iowa Supreme Court in Iowa v. Bentley, Sup. Ct. No. 06-1000. She is currently authoring amicus briefs for the Kansas Supreme Court in State v. Henderson, 129 P.3d 646 (Kan. Ct. App. 2006), and the Minnesota Supreme Court of State v. Krasky (Minn. Ct. App. 2005) 696 N. W.2d 816. She also routinely publishes articles on the subject of the admissibility of statements of young children for the American Prosecutors Research Institute.

An amicus brief filed on behalf of the American Prosecutors Research Institute in support of Plaintiff-Appellant, the State of Ohio, will provide this court with the results of child development research from around the world as to what children understand about court and statements that they made, as well as case law from around the country that has

conducted a Crawford analysis from the viewpoint of a child. Therefore, the State of Ohio respectfully requests that this court admit Ms. Alice Anna Phillips *pro hac vice*.

Respectfully submitted



RAMONA FRANCESCONI ROGERS

Ashland County Prosecuting Attorney

Proof of Service

I certify that a copy of this Memorandum in Support of Jurisdiction was sent by ordinary U.S. mail to counsel for Appellee, Jill Stone and Craig Jaquith, State Public Defenders, 8 East Long Street, 11<sup>th</sup> Floor, Columbus, Ohio 43215, on this 8<sup>th</sup> day of December, 2006.



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