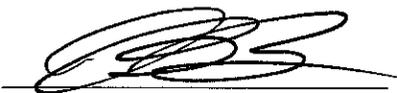




It is well settled in this jurisdiction that an accused contemnor in criminal and civil contempt cases has the due process right to counsel, including court appointed counsel if indigent, if incarceration is a possible sanction. **In re Contemnor Caron, 110 Ohio Misc. 2d 58 (C.P. 2000), referring to (United States Constitution Amendment VI, XIV; Ohio Constitution Article I, §§ 10, 16).** Ergo, inasmuch as Bruce Andrew Brown ("Brown") is indigent and without the necessary funds to retain an attorney (**Exhibit A**), he has the right to appointed counsel in this cause.

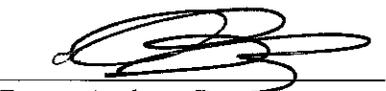
Similar to the foregoing, Brown is without the necessary funds to travel to Columbus, Ohio for any hearing that may be held in this matter (**Id.**). Therefore, Brown respectfully requests that any Hearing scheduled in this matter be conducted in Cleveland, Ohio.

Respectfully Submitted,

  
Bruce Andrew Brown

#### **CERETIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing Request on Lori J. Brown, 250 Civic Center Drive, Suite 325, Columbus, Ohio 43215-7411 this 4<sup>th</sup> day of November, 2010 via first class mail, postage prepaid.

  
Bruce Andrew Brown

**AFFIDAVIT**

**STATE OF OHIO**

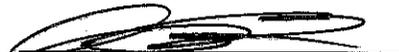
**.ss:**

**COUNTY OF CUYAHOGA**

The Affiant, BRUCE ANDREW BROWN, being duly sworn, deposed and states the following:

1. That I am the Respondent in the case, *sub judice*.
2. That I am indigent and without the requisite funds to pay for counsel in this case.
3. That I am indigent and without the requisite funds to pay for transportation to get to Columbus, Ohio.

THE AFFIANT FURTHER SAYETH NAUGHT.

  
Bruce Andrew Brown

Subscribed and sworn to before me this 4<sup>th</sup>  
day of November, 2010.

  
Notary Public

Deborah A. Folan  
My Commission expires  
May 10, 2014

