

ORIGINAL

IN THE SUPREME COURT OF OHIO

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|-----------------------|---|----------------------------------|
| STATE OF OHIO | : | Case No. 2013-0690 |
| Plaintiff- Appellee | : | |
| | : | On Appeal from the Butler |
| -v- | : | County Court of Appeals, Twelfth |
| | : | Appellate District |
| RICHARD J. JONES | : | |
| Defendant- Appellant, | : | C.A. Case No. 2012-04-0077 |

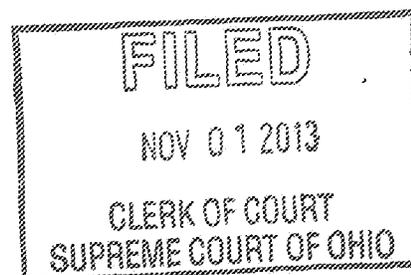
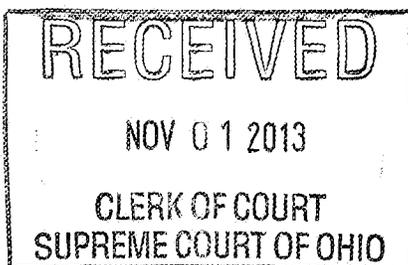
MOTION FOR RECONSIDERATION
OF APPELLANT RICHARD J. JONES

Richard J. Jones, #A659-035
Lebanon Correctional Institution
P.O. Box 56
Lebanon, Ohio 45036-0056

DEFENDANT-APPELLANT, PRO SE

Michael T. Gmoser
Butler County Prosecuting Attorney
315 High Street, 11th Floor
Hamilton, Ohio 45011-0515
(513) 785-5204

COUNSEL FOR PLAINTIFF-APPELLEE, STATE OF OHIO



Dear Supreme Court of Ohio,

I, Richard J. Jones, ask this Honorable Court to please reconsider your decision in regards to accepting jurisdiction in this case due to the considerable number of substantial Constitutional questions in this Memorandum and 26(B) filing involving the 5th, 6th, and 14th Amendment to the U.S. Constitution, as well as the Ohio Constitution, because of the ineffective assistance of counsel and page limitations that are permitted.

All throughout the Twelfth District Court Opinion in this case has inaccurate and false information that leads to the outcome of their analysis. There are a few examples of this in the M.I.S.J. I'm referring to here, and numerous others that are not listed due to page limitation and not by being derelict or a lack of diligence.

I have been studying the U.S. Constitution and Amendment involving my case and have come to the conclusion as I am sure you will too, that the 5th, 6th, and 14th Amendments to the U.S. Constitution have been violated. As well as the Ohio Constitution, Section 5 and 10, which resulted in prejudice.

With the various clauses of these Amendments being violated, a lawyer who cares to see that justice is done, needs to be seen by me so I can point out the discrepancies between Appellant, Appellee, and the Twelfth District Court. Disagreements that include incorrect and sometimes a biased examination of the trial and evidence that pertains to the Constitutional Amendments mentioned earlier and possibly more. To include the nullification of any supporting evidence on behalf of the Appellant that is simply ignored or construed as false. With the bias and prejudice of the violation to the Amendments, sure the weight and credibility is subject to look delicate.

In the pages of the Twelfth District Court Opinion are a significant amount of mistaken, untrue, or wrong statements and quotes from the Trial Transcripts that appears the Twelfth District only took the Appellee's word for it and never even read the Trial Transcripts. They only express and semantically embellish inculcate grounds and disregard any exculpate evidence.

Before becoming a justice in the Twelfth District Court of Appeals, Judge Piper was the prosecutor in the Butler County that has worked with and formed relationships with everyone involved in the case which has caused a biased conflict of interest. Furthermore, the botching of the 911 call Appellant made in an attempt to save the life of Richard, Sr. is due to the negligence of the Middletown Police Dept. Dispatch unit by not relaying the 911 call to police in the field for 22 plus minutes; therefore, causing a significant delay in attempting to save the life of Richard, Sr.. Appellant is suggesting another conflict of interest in regards to the city trying to avoid being sued for a wrongful death. An hour went by before paramedics had an opportunity to work because of the way dispatch and police responding to the scene handled the situation.

Finally, Appellant requests that this Honorable Court accept jurisdiction in this case so that the important issues presented involving the Constitution will be reviewed on the merits.

Respectfully submitted,

A handwritten signature in black ink that reads "Richard J. Jones". The signature is written in a cursive, flowing style.

Richard J. Jones, #A659-035

Appellant, Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion For Reconsideration of Appellant Richard J. Jones, has been served by U.S. Mail, postage pre-paid, to counsel for the State of Ohio, Michael T. Gmoser, Butler County Prosecuting Attorney, 315 High Street, 11th Floor, Hamilton, OH 45011 on this the 25th day of Oct, 2013.

A handwritten signature in cursive script that reads "Richard J. Jones". The signature is written in black ink and is positioned above the printed name and title.

Richard J. Jones, #659-035
Defendant, Appellant, Pro Se