

DATE TYPED: October 17, 2017  
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**IN RE: ALVA CAMPBELL JR., CCI #A354-963**

**STATE OF OHIO  
ADULT PAROLE AUTHORITY  
COLUMBUS, OHIO**

Date of Meeting: October 12, 2017

Minutes of the **SPECIAL MEETING** of the  
Adult Parole Authority held at 770 West Broad Street,  
Columbus, Ohio 43222 on the above date.

**IN RE: Alva Campbell Jr., CCI #A354-963**

**SUBJECT:** Death Sentence Clemency

**CRIMES, CONVICTIONS:** Aggravated Murder, Aggravated Robbery, Kidnapping, Felonious Assault, Escape, Weapon Under Disability

**DATE, PLACE OF CRIME:** April 2, 1997 in Columbus, Ohio

**COUNTY:** Franklin

**CASE NUMBER:** 97CR042020

**VICTIMS:** Charles Dials – Deceased  
Teresa Harrison  
Katie Workman  
James D. Gillam

**INDICTMENT:** Count 1: Aggravated Murder w/specifications  
Count 2: Aggravated Murder w/specifications  
Count 3: Aggravated Murder w/specifications  
Count 4: Aggravated Murder w/specifications  
Count 5: Kidnapping w/specifications  
Count 6: Aggravated Robbery w/specifications  
Count 7: Aggravated Robbery w/specifications  
Count 8: Felonious Assault w/specifications  
Count 9: Escape w/specifications  
Count 10: Aggravated Robbery w/specifications  
Count 11: Attempted Kidnapping w/specification  
Count 12: Aggravated Robbery w/specifications  
Count 13: Attempted Kidnapping w/specification  
Count 14: Weapon Under Disability

**TRIAL:** Found guilty by jury of all counts

**DATE OF SENTENCE:** April 3, 1998

**SENTENCE:** Count 1: Merged into Count 3 for sentencing  
Count 2: Merged into Count 3 for sentencing  
Count 3: DEATH  
Count 4: Merged into Count 3 for sentencing  
Count 5: 3-year Gun + 20 years<sup>1</sup>  
Count 6: 3-year Gun + 20 years  
Count 7: 3-year Gun + 20 years<sup>2</sup>

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<sup>1</sup> The firearm specifications attached to counts five and six were merged.

<sup>2</sup> The firearm specifications attached to counts seven and eight were merged.

Count 8: 3-year Gun + 20 years  
Count 9: 3-year Gun + 16 years  
Count 10: 3-year Gun + 20 years<sup>3</sup>  
Count 12: 3-year Gun + 20 years<sup>4</sup>  
Count 14: 1 year

ADMITTED TO INSTITUTION: April 10, 1998  
JAIL TIME CREDIT: 372 days  
TIME SERVED: 234 months (does not include jail time credit)  
AGE AT ADMISSION: 49  
CURRENT AGE: 69  
DATE OF BIRTH: April 30, 1948  
SENTENCING JUDGE: John A. Connor  
PROSECUTING ATTORNEYS: Ron O'Brien, Prosecuting Attorney  
Doug Stead, Assistant Prosecuting Attorney

**FOREWORD:**

A clemency proceeding in the case of Alva Campbell Jr. (A354963) was initiated by the Ohio Parole Board pursuant to Sections 2967.03 and 2967.07 of the Ohio Revised Code and Parole Board Policy 105-PBD-01.

On September 18, 2017, the Parole Board interviewed Campbell, who appeared via videoconference from the Chillicothe Correctional Institution. A clemency hearing was held on October 12, 2017 with twelve (12) members of the Parole Board participating. Arguments in support of and in opposition to clemency were presented at that hearing.

The Parole Board considered all of the written submissions, arguments, and information disseminated by presenters at the hearing, as well as the judicial decisions. The Parole Board deliberated upon the propriety of clemency in the case. With twelve (12) members participating, the Board voted eleven (11) to one (1) to provide an unfavorable recommendation for clemency to the Honorable John R. Kasich, Governor of the State of Ohio.

**DETAILS OF THE INSTANT OFFENSE:**

The following account of the instant offense was obtained from the decision of the Supreme Court of Ohio dated April 10, 2002:

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<sup>3</sup> Count 11 was merged with count ten.

<sup>4</sup> Count 13 was merged with count 12.

In 1972, Campbell was convicted of first-degree murder (former *R.C. 2901.01*) and sentenced to life imprisonment. Twenty years later, he was paroled. In 1997, he was arrested in Franklin County on a charge of aggravated robbery.

On April 2, 1997, Deputy Sheriff Teresa Harrison drove Campbell from the Jackson Pike Jail to Franklin County for his arraignment. Campbell was feigning paralysis and was in a wheelchair.

Around 12:30 p.m., Charles Dials was paying a ticket at the traffic bureau of the Franklin County Municipal Court. About the same time, Harrison parked in a courthouse loading dock and began to help Campbell out of the vehicle. Campbell suddenly assaulted her, stole her pistol, and fled.

Dials had just driven away from the courthouse in his pickup truck when Campbell ran out into the street. Campbell stopped Dials's truck and pulled open the driver's door. Campbell told Dials, "I don't want to hurt you; just move over." Campbell got inside and drove off with Dials.

Campbell drove to a Kmart on South High Street. He parked there and talked with Dials, telling him not to be nervous. Then he drove to a factory on a side street. There, Campbell took Dials's money and made Dials exchange clothes with him.

Campbell then drove back to High Street, bought a 40-ounce bottle of beer at a drive-through and returned to the Kmart. In the parked truck, he sat talking with Dials "probably a good 2 hours," according to his confession. A radio report on Campbell's escape mentioned that he had commandeered a red truck. Dials said, "That's you, ain't it?" Campbell admitted it was, and they talked a while longer.

Campbell then moved the truck behind the Kmart, driving around the back lot three times before he finally chose a parking space. He told Dials to "get on the floor board of his truck." When Dials obeyed, Campbell shot him twice.

Campbell drove around to the Kmart's main parking lot and waited. Eventually, Katie Workman drove in and parked near the truck. Campbell then tried to kidnap her. Workman escaped, although Campbell seized her wallet and car keys. Campbell then drove Workman's car to a nearby shopping center, where he tried to kidnap James Gilliam. Gilliam also managed to escape, leaving his car but keeping his keys.

Campbell drove around in Workman's car until a police officer saw him. He drove away from the officer, then abandoned the car and fled on foot. Campbell hid in a tree but was spotted. When police surrounded the tree, Campbell dropped Deputy Harrison's gun and surrendered. In police custody, Campbell made a videotaped confession.

Campbell was indicted on four counts of aggravated murder. Each aggravated murder count carried four death specifications: murder to escape detection, apprehension, trial, or punishment, *R.C. 2929.04(A)(3)*; felony murder predicated on aggravated robbery, *R.C. 2929.04(A)(7)*; felony murder predicated on kidnapping, *R.C. 2929.04(A)(7)*; and having a prior murder conviction, *R.C. 2929.04(A)(5)*. The indictment also contained ten non-capital counts.

Campbell was convicted of all counts and specifications; the trial court merged the death specifications under *R.C. 2929.04(A)(3)* into the felony-murder death

specifications. Thus, only three specifications were presented to the jury at the penalty phase. The jury recommended a death sentence and, after merging the four aggravated murder counts into one, the trial judge sentenced Campbell to death on Count Three.

**PRIOR RECORD**

The following information was obtained from the Offender Background Investigation completed on July 31, 1998 and the Post-Sentence Investigation completed on April 4, 1983:

**Juvenile Offenses:**

The Post-Sentence Investigation completed on April 4, 1983 and the Offender Background Investigation completed on July 31, 1998 do not note any juvenile history. The Post-Sentence Investigation dated April 4, 1983 indicates that any record that Campbell may have had with the Cuyahoga County Juvenile Court is unavailable.

**Adult Offenses:**

<b><u>Date</u></b>	<b><u>Offense</u></b>	<b><u>Location</u></b>	<b><u>Disposition</u></b>
09/24/67 (Age 19)	Armed Robbery Grand Larceny Case #6333 (R75472) (Turned over from inmate #A127091 on 8/16/68)	Willoughby, OH	10-25 years Admitted: 06/17/68 Paroled: 12/21/71 Recommitted: 11/02/72
10/11/67 (Age 19)	Armed Robbery Case #4139 (R75472) (Turned over from inmate #A127091 on 8/16/68)	Medina, Ohio	10-25 years Admitted:06/17/68 Paroled: 12/21/71 Recommitted: 11/02/72
10/11/67 (Age 19)	Armed Robbery Case # 34927 (R75472) (Turned over from inmate #A127091 on 8/16/68)	Akron, OH	10-25 years Admitted: 06/17/68 Paroled: 12/21/71 Recommitted: 11/02/72
10/11/67 (Age 19)	Shooting with Intent to Kill Case #34924 (R75472) (Turned over from inmate #A127091 on 8/16/68)	Akron, OH	1-20 years Admitted: 06/17/68 Paroled: 12/21/71 Recommitted: 11/02/72
04/21/72 (Age 23)	Murder 1st Degree Murder 1st in Perpetration of Robbery Case #4302 (A135471)	Cleveland, OH	Life Admitted: 11/02/72 Paroled: 06/02/92 Recommitted: 10/07/97

02/11/97 (Age 49)	Aggravated Robbery 97CR042019 (A350582)	Columbus, OH	10 years Admitted: 10/07/97 Turned Over to Another Number: 04/10/98
03/04/97 (Age 49)	Aggravated Robbery (2 counts) Kidnapping Aggravated Burglary Felony Assault	Columbus, OH	12 GUN + 66 year term Admitted: 10/07/97 Turned Over to Another Number: 04/10/98
03/09/97	Aggravated Robbery		
03/13/97	Aggravated Robbery (3 counts) Felony Assault 97CR031593 (A350582)		
04/02/97 (Age 49)	Aggravated Murder Aggravated Robbery (4 counts) Kidnapping Felony Assault Escape Weapon Under Disability 97CR042020 (A354963)	Columbus, OH	<b>INSTANT OFFENSES</b>

**Other convictions:**

Parking in a Fire Lane (7/12/93); No Seatbelt (02/22/94); and Dog Confinement (07/17/95).

**Institutional Adjustment:**

Campbell was admitted to the Ohio Department of Rehabilitation and Correction on April 10, 1998. His work assignments while incarcerated at the Mansfield Correctional Institution included Porter, Food Service Worker, Material Handler, and Recreation Worker. While incarcerated at the Ohio State Penitentiary, Campbell's work assignments included Library Aide. Campbell is presently incarcerated at the Chillicothe Correctional Institution and does not have a work assignment.

According to the Offender Background Investigation completed on July 31, 1998, Campbell attended Cleveland Public Schools but did not graduate. That investigation further indicates that Campbell self-reported that he received his GED and his Bachelor's Degree in Criminal and Child Psychology while incarcerated with the Ohio Department of Rehabilitation and Correction. However, the Ohio State University (OSU) Records Verification Department reported that no records exist indicating Campbell had ever attended OSU, the investigation notes.

Since his admission in 1998, Campbell has accumulated the following disciplinary record resulting in his being placed in disciplinary control, local control, or restrictive housing, as indicated below:

- 12/21/14: Unauthorized possession, manufacture, or consumption of drugs or any intoxicating substance. The unit correctional officer called medical personnel due to Campbell having distressed breathing. It was determined by medical personnel at the time of arrival that Campbell was intoxicated. He was placed in disciplinary control for 15 days.
- 07/18/16: Fighting, with or without weapons, including instigation of, or perpetuating fighting. Campbell was in a physical altercation with another inmate. He was placed in restrictive housing for 14 days.
- 07/18/16: Unauthorized possession, manufacture, or consumption of drugs or any intoxicating substance. Campbell self-admitted to staff and medical personnel that he consumed homemade alcohol, or “hooch,” prior to the altercation with another inmate. He was placed in restrictive housing for 14 days.

Campbell has received the following conduct report that did not result in placement in disciplinary control. That rule infraction involved:

- Possession of contraband, including any article knowingly possessed which has been altered or for which permission has not been given in October 2000. Campbell had an extra pillow in his possession when he was only permitted to have one. The pillow was confiscated and destroyed.

**APPLICANT’S STATEMENT:**

On September 18, 2017, members of the Ohio Parole Board conducted an interview with Campbell via videoconference from the Chillicothe Correctional Institution.

The following individuals observed the interview via videoconference but did not participate: Kevin Stanek, Assistant Chief Counsel, Office of Governor John Kasich; Brenda Leikala, Assistant Ohio Attorney General; Stephen Maher, Assistant Ohio Attorney General; David Stebbins, Attorney for Campbell; Justin Thompson, Attorney for Campbell; Adam Rusnak, Attorney for Campbell; Ron O’Brien, Franklin County Prosecuting Attorney; and Steve Taylor, Chief Counsel, Criminal Division-Appellate Unit, Office of the Franklin County Prosecuting Attorney.

Parole Board Chair Andre Imbrogno introduced himself and the other members of the Parole Board to Campbell and then identified the individuals who were observing the interview but were not participating. He explained the purpose of the clemency interview to Campbell and noted that Campbell’s clemency hearing was scheduled for October 12, 2017.

Chair Imbrogno asked Campbell what he would like the Board to consider in determining whether to make a favorable or unfavorable recommendation for clemency in his case. Campbell thanked the Board for considering him for clemency. He then apologized to the family of Charles Dials and everyone else who has suffered as a result of his crimes. Campbell stated that he is guilty of the crimes

for which he has been convicted and that he is deeply sorry for having committed them. Campbell requested that his sentence be commuted to life without the possibility of parole and offered several bases for that request.

First, Campbell reiterated that he takes full responsibility for his actions, noting that he has been committing crimes throughout his life, resulting in him having spent most of the adult portion of it incarcerated. Campbell acknowledged that he has committed two murders as well as other serious offenses.

Campbell then described how he was raised in dysfunctional, chaotic environments. According to Campbell, his natural parents were alcoholics and his father was physically abusive toward Campbell, his sisters, and his mother. He said that his father taught him how to steal and introduced him to hard alcohol and cigarettes when he was just ten years old. Campbell further related that his father had sex with Campbell's sisters and played cruel games with all of the children, including forcing them to hold hands with him and one another while he stuck his finger in an electrical socket and one of the children held a faucet to act as a ground, thereby sending an electrical current through each of them. Campbell also described his father chasing the children around the home while holding dead animals. Campbell related that his mother prostituted his sisters. He painted a picture of a family home that was devoid of morality and indicated that he himself received no moral guidance from his parents.

Campbell described his father, who was white, as a racist despite having married Campbell's mother, who was black. To this day, Campbell cannot understand his father's hatred of blacks. Campbell described the experience of growing up with a white father and black mother as very difficult.

After his father was committed to Lima State Hospital for incest, Campbell and his siblings were removed from the family home. According to Campbell, life for him actually got worse from there, and he described being moved between various foster homes and institutions where he was both sexually and physically abused. Campbell suggested that his entire life has been characterized by the absence of stability, noting that since childhood he has isolated himself from everyone, including his siblings. Campbell described his life as a "total failure" and stated that while he accepts responsibility for that fact, the "system" has failed him throughout, particularly in his childhood, where dysfunction was ingrained in him at an early age.

Campbell stated that he has not exhibited any violent tendencies during his present incarceration and that during his several incarcerations, he has consistently programmed and followed institutional rules. He insisted that this positive adjustment, not his violent crimes, represents his true character, and he poses no threat to anyone today.

Campbell indicated that he is presently dealing with the debilitating effects of several physical ailments, including chronic obstructive pulmonary disease (COPD), cancer, a broken hip, and methicillin-resistant staphylococcus aureus (MRSA). Campbell stated that he tires easily and uses a walker, spends most of his time in his cell and, according to his doctors, has anywhere from six months to a year to live. Campbell stated that knowing his own body as well as he does, he is confident that he does not have long to live. Campbell also suggested that he has one or more psychological disorders for which he is receiving medication. Campbell acknowledged that having feigned paralysis to escape custody in 1997, some might question whether he does in fact suffer from all of those ailments. However, he urged that his medical records, which document those conditions, speak for themselves.



When asked to describe the events of April 2, 1997, Campbell stated that he was being held in jail for a robbery during the commission of which he was shot. At the hospital, Campbell told his doctors that he was having difficulty walking and he was placed in a wheelchair. At that time, he knew that he did not want to go back to prison and while in the county jail he decided that he would try to escape if and when the opportunity arose.

That opportunity came on April 2, 1997, when he was being transported without shackles to the Franklin County Court of Common Pleas. Upon arriving at the courthouse, he overtook the female deputy who was transporting him and stole her gun. Campbell said that he put little planning into the escape and simply seized the opportunity when it presented itself. During the interview, Campbell specifically rejected the notion that the deputy whom he overpowered bore any responsibility for the escape and what transpired after, claiming that he alone is responsible for his actions that day.

Campbell recalled that Charles Dials was just pulling out of the courthouse when Campbell came upon him and jumped into his truck. The first place he and Dials went was a carryout where they purchased beer and cigarettes. According to Campbell, between jumping into Dials's pickup truck and shooting Dials, he consumed four or five 40-ounce beers. Campbell described how he forced Dials to exchange clothing with him and how he and Dials drove around for some time talking about their families. He said it was his intention to release Dials at some point.

Campbell said that he and Dials were sitting in the parking lot of a Kmart when he heard a helicopter overhead, and at that point, he panicked and shot Dials. There was no "rhyme or reason" to the killing, Campbell insisted. Campbell acknowledged that Dials was on the floor of the truck when he shot him but indicated that he had actually been holding Dials in that position for some time because he did not want law enforcement to be able to see Dials.

Campbell suggested that his alcohol consumption may have contributed to his panicked response to the helicopter, noting that he does not believe that he would have killed Dials had he not been intoxicated. When asked whether he would have killed Katie Workman had she not jumped out of her car and fled, Campbell denied any intention to kill her. At that time, he only wanted to escape, and the fact that he did not kill Workman suggests that he did not want to kill Dials, Campbell said.

When asked to describe the circumstances surrounding his prior murder conviction for shooting a man at a bar called Friendly Tavern in 1972, Campbell responded that the crime was a response to racism that was being directed at him by the victim, who was the son of the bar's owner. While attempting to patronize the Friendly Tavern, the victim stated to Campbell that "his kind" was not welcome in the bar, which hurt him deeply to the point that he left the bar, went home, cried, and returned to the bar with a gun. The victim brandished his own gun, Campbell continued, and in response, Campbell shot him. Campbell stated that he does not recall shooting the victim in the head.

Campbell could recall little about the circumstances surrounding his 1968 conviction for shooting a state trooper with intent to kill. Campbell stated that he was a naïve 19 year old when he committed that crime. According to Campbell, he did not intend to shoot the trooper, that he was actually trying to shoot "around" the trooper, and that the bullet that struck the victim was the result of a ricochet.

During the interview, Campbell was asked about recent institutional misconduct, including a 2016 fight involving another inmate. According to Campbell, that incident was not a fight, but rather an attack upon him by that other inmate. The incident, according to Campbell, involved a young man

who was outside Campbell's cell making a lot of noise while playing a video game. Campbell said he came out of his cell to ask the young man to quiet down, and after he turned his back on the other inmate, that inmate attacked him from behind, breaking his hip.

Campbell acknowledged that on the day of that fight, he had been drinking "hooch" that he had made. Campbell also admitted to making and consuming alcohol in 2014. According to Campbell, he has struggled with alcohol throughout his life and it has been a problem for which he has never been able to obtain help. Campbell recalled that the moment he was last released from prison in 1992, he was again drinking. Campbell stated that he most recently consumed "hooch" two months ago and that his most recent experience with it, which made him ill, brought him to the realization that he is no longer able to physically tolerate alcohol.

Campbell stated that he received a fair trial and conceded that there is no doubt as to his guilt. However, he added, had the jury heard all of the mitigation evidence surrounding his upbringing, the jury would not have returned a recommendation for death. Dr. Jeffrey Smalldon, a psychologist who provided mitigation testimony at Campbell's trial, only skimmed the surface of his upbringing and family dynamics, Campbell insisted. His sister was the only family member to testify on his behalf during the penalty phase and even she offered little insight into their family, he added. Despite the fact that his upbringing had a dramatic impact on his life and contributed to his present situation, the jury heard only a minute portion of his overall childhood experience, Campbell urged.

Campbell related that his support system in the community is comprised principally of two individuals with whom he corresponds, one of whom is a nun who lives in New York. Campbell indicated that he has no contact with his family, as they have their own lives and do not need to be reminded of his situation and their childhoods. When asked why his siblings did not follow the same criminal path despite having been raised in the same environment, Campbell answered that he had never considered that specific question before now but would speculate that perhaps the answer lies in his sisters having eventually married and settled down.

Campbell stressed that he has changed tremendously since returning to prison. No longer does he believe that the world, and everyone in it, is against him. Today, he believes that there are good people in the world who want to help him and he receives that help today in the form of psychological care and other assistance.

Campbell concluded by noting that he hopes that the Board can see the change that he has undergone and again apologized for his crimes, stating that if he could take them back he would. Thereafter, Chair Imbrogno thanked Campbell for participating and concluded the interview.

### **ARGUMENTS IN SUPPORT OF CLEMENCY:**

At the hearing held on October 12, 2017, Campbell's attorneys, David Stebbins, Justin Thompson, and Adam Rusnak, presented arguments in support of clemency supplementing the written application previously submitted to the Board.

Campbell's attorneys advanced five bases for their request to commute Campbell's sentence to life without the possibility of parole: (1) Campbell experienced significant abuse and neglect at the hands of his parents and later while a ward of the state; (2) the outcome of the mitigation phase of the trial is unreliable because (a) Campbell's trial counsel was ineffective in failing to present to the jury evidence

of his treatment in foster care and institutional settings after he was removed from the family home, and (b) the trial court improperly excluded evidence of Campbell's voluntary intoxication, which his trial attorneys attempted to introduce as a mitigating factor; (3) Campbell has exhibited a consistently positive adjustment during his incarceration; (4) Campbell presently suffers the debilitating effects of numerous illnesses that have left him frail and feeble; and (5) Campbell accepts responsibility for his crimes and is remorseful.

### **Campbell Experienced Significant Childhood Abuse and Neglect**

Stebbins prefaced his description of Campbell's upbringing by observing that Campbell grew up in a much different world than exists today. In 1948, the year Campbell was born, police and courts were much more tolerant of domestic violence, and schools did not routinely report evidence of child abuse and neglect. There was considerably more racism generally, and Cleveland was a particularly segregated city, especially the school system. Children of mixed race like Campbell were the exception and were not accepted by either race.

Stebbins described Campbell's upbringing as uncommon in both the abuse exacted upon him and in its overall level of dysfunction. Campbell's childhood was a "parallel universe" in which the normal rules of society did not apply, Stebbins urged. Campbell's father, who was white, was an overt racist who abused his wife and children with racial epithets despite having married Campbell's mother, who was black. Campbell, who is very light skinned, grew up confused about his own racial identity and was never accepted by either race. Campbell's father was the only white man in the housing projects, Stebbins continued, and Campbell as well as his siblings were routinely referred to in the community as "half breeds" and "zebras." Campbell's father forbade his children from having any contact with black children and, given the racial makeup of the community, that effectively prohibited any contact with other children whatsoever.

According to Stebbins, both of Campbell's parents were alcoholics. Campbell's father drove a beer truck and would brag about stealing beer from his employer. The family home was a chaotic environment, particularly on weekends and holidays when Campbell's parents were not working. Campbell's father would often beat Campbell's mother in front of the children, throwing her out into the cold and locking her out of the home, Stebbins described. Stebbins further related that Campbell's mother was sometimes rendered unconscious during the beatings, that the children were forced by their father to watch their mother being abused, and that the children would themselves be beaten if they attempted to intercede on their mother's behalf.

According to Stebbins, Campbell's father would play sadistic "games" with the children, which included chasing the children around the home while holding dead animals and the "electric game" that Campbell described during his interview with the Parole Board, which involved his father having all of the children hold hands while he ran electrical current through them. In addition, Campbell's father would force the children to stay up late into the night watching boxing, beating the children to keep them awake, Stebbins related. Campbell's father also sexually abused Campbell's sisters and likely Campbell himself, Stebbins added. Campbell's father taught Campbell to drink alcohol when Campbell was just eight years old and only praised Campbell when he stole cigarettes for him, Stebbins described.

According to Stebbins, Campbell's father kept the children completely isolated such that Campbell and his siblings had no friends, could not participate in school activities, and had no contact with

extended family. While neighbors would sometimes call the police to report the chaos occurring in Campbell's home, ultimately the police never made Campbell's father leave the home or otherwise took steps to ensure the welfare and security of Campbell's mother and the children.

Eventually, Campbell's father was committed to the Lima State Hospital for raping one of Campbell's sisters. Despite the removal of that disruptive influence from his life, things did not improve for Campbell following his father's incarceration, Stebbins related. Campbell remained in the care of his mother, who continued to abuse alcohol and was unable to offer any responsible parenting or provide for even the most basic of the children's needs. Campbell was essentially receiving no meaningful supervision from his mother or any other adult, Stebbins suggested. Campbell's mother was complicit in prostituting Campbell's sisters in exchange for money and alcohol when the girls were teenagers, and one of Campbell's sisters became pregnant at age 15, Stebbins described. Campbell and his sisters were finally removed from their mother's care after the children entered a bar and begged for food.

Stebbins argued that while authorities had Campbell's best interests at heart, they did not effectively respond to the severe behavioral and psychological problems that resulted from the profoundly dysfunctional environment in which he was raised. In the years immediately following his removal from the family home, Campbell was placed in the Cleveland Detention Center, a temporary holding facility for juveniles; several foster homes; and the Elwyn Training School in Pennsylvania, a school intended for children who, unlike Campbell, had intellectual disabilities. In the three years following his removal from his mother's care, Campbell was placed into various homes and institutions 14 separate times, even returning to his mother at one point, Stebbins related. When not placed with his mother, she remained a persistently negative influence on Campbell, encouraging him to run away, Stebbins described.

According to Stebbins, Campbell, who was slightly built and considerably smaller than his peers, was routinely abused both physically and sexually by other children and was in a constant state of anxiety. His adjustment problems were compounded by his mixed race, which made him a target for abuse and which frustrated his attempts to be accepted by a peer group. In the three years following his removal from his mother's care, Campbell was clearly exhibiting the negative effects of his life experiences with frequent nightmares, nail biting, dissociation, depression, suicidal ideation, and other emotional problems approaching psychosis, Stebbins stated. Campbell, who had become a sexual victim and "scapegoat," eventually began himself initiating sexual activity as a means of survival, Stebbins suggested. In short, Stebbins continued, the dysfunctional and often dangerous environments in which Campbell was placed while a ward of the state only exacerbated Campbell's already emotionally unstable state.

According to Stebbins, things somewhat improved for Campbell after he was placed at the Harborcreek School in Pennsylvania at age 13. Despite making some progress at Harborcreek, that facility ultimately expelled Campbell for being a negative influence on the younger children. From there, Campbell was again placed with his mother, where the progress achieved at Harborcreek was largely undone, and he was then placed in different institutions until he reached adulthood, never receiving the proper diagnosis and treatment for his severe psychological and emotional problems, Stebbins described.

We know today, Stebbins argued, that unrelenting stress like that which Campbell experienced can be toxic to the brain's structure, resulting in problems with executive functioning, impulse control, and anger. Unfortunately, that physiological impact is not something that children simply outgrow,

Stebbins continued. Stebbins argued that unless one accepts the premise that the environment in which a child is raised has no impact upon that child's later propensity to engage in violent behavior and that one is simply born with the propensity for violence or not, then the absence of appropriate role models, the extreme violence in Campbell's family home, and the absence of sexual boundaries in that home had to have had long-term, negative effects upon Campbell as he progressed from childhood into adulthood.

Stebbins acknowledged that Campbell's sisters grew up in the same toxic environment as Campbell and although they have never engaged in homicidal violence, he argued that their lives have not been particularly productive or safe, as they were sexually promiscuous early in their lives and at least one spent time in juvenile detention. Eventually, Stebbins continued, Campbell's sisters were placed in decent settings where, unlike Campbell, they received the care and treatment they needed.

Stebbins played a pre-recorded video featuring sociologist Clemens Bartollas, who indicated that he interviewed Campbell and reviewed his records.<sup>5</sup> Bartollas described Campbell's childhood home as a place of total chaos, turmoil, pain, and deprivation. Bartollas opined that during the 30 years he has been involved in capital cases, he has never witnessed an upbringing as bad as Campbell's. According to Bartollas, throughout Campbell's childhood and into his adolescence, his needs went unmet on every level. Bartollas stated that in his career he has seen many examples of "state-raised youths" like Campbell who are shuttled from one institutional setting to another, but none has floundered as much as Campbell.

Bartollas described the several institutions in which Campbell was placed during his adolescence, noting that Campbell was routinely targeted by older, stronger boys and that Campbell acquired the status of "chronic victim" or "scapegoat," which is a particularly difficult label to escape. Because he was slightly built and weak, Campbell's survival strategy was to surrender his own body to sexual victimization, Bartollas continued.

According to Bartollas, none of the various institutions in which Campbell was placed as a youth ever developed a treatment plan for Campbell, which Bartollas finds incomprehensible given Campbell's numerous and obvious needs. The absence of any treatment meant that Campbell never had the opportunity to turn his life around. Bartollas urged that the first thing that should have been provided to Campbell when he was removed from the family home was a setting where he could feel secure, and then should have been provided with an education and a designated mentor who could protect him and model positive, pro-social behavior. Bartollas further opined that Campbell should have been assigned a social worker to consistently reinforce the need to exhibit positive behavior. In the end, Bartollas lamented, everyone failed Campbell.

Bartollas acknowledged that not everyone who is raised in a negative environment commits the kinds of crimes that Campbell has committed. However, he continued, the more negative experiences one has as a child and the more dysfunctional environments in which a child is placed, the more likely that child is to exhibit violent tendencies into adulthood. Bartollas concluded by opining that the manner in which the state handled Campbell in his adolescence effectively destroyed any prospect for a successful outcome as an adult.

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<sup>5</sup> Stebbins stated that he was providing Bartollas's testimony via pre-recorded video because Bartollas, who lives out of state and is 81 years old, could not make the trip to Columbus to appear personally for the hearing.

Bob Stinson, a forensic psychologist, indicated that he met with Campbell several times over a three-year period beginning in 2014 for the purpose of creating a diagnostic evaluation of Campbell. Stinson said he also reviewed 900 pages of records and spoke with Campbell's family members. Stinson indicated that his goal throughout was to conceptualize psychologically who Campbell is today.

Stinson ultimately identified four diagnoses: post-traumatic stress disorder (PTSD), alcohol use disorder, antisocial personality disorder, and mild neurocognitive disorder. According to Stinson, the neurocognitive disorder reflects cognitive impairments that he has observed Campbell exhibiting over time, which are likely the product of age and illnesses. That neurocognitive disorder is relatively mild and is not part of Campbell's overall conceptualization as a person, Stinson noted. That conceptualization is instead comprised of the other diagnoses—PTSD, alcohol use disorder, and antisocial personality disorder.

According to Stinson, Campbell satisfies each of the criteria and each applicable subcategory of those criteria for not only a diagnosis of PTSD, but of PTSD in a very serious form. Stinson opined that Campbell likewise satisfies more than enough criteria for a diagnosis of alcohol use disorder and antisocial personality disorder.

Stinson suggested that Campbell is a product of the trauma that he experienced as a child and throughout his adolescence, and that all of the trauma inflicted upon Campbell, including the abusive and isolative atmosphere of the family home, defines who he is as a person today. According to Stinson, Campbell's antisocial personality is only one component of his overall psychological conceptualization; it is only that conceptualization's "outer shell." To fully appreciate Campbell's overall psychological conceptualization, Stinson continued, one must look beyond that outer shell to both the trauma that Campbell experienced in his upbringing and his severe psychological response to that trauma.

Stinson opined that given the amount of trauma that Campbell experienced during his childhood and the duration of it, a successful outcome was quite unlikely for Campbell. The violence that Campbell has exhibited as an adult is, in a sense, a barometer of the amount of trauma he experienced growing up, Stinson summarized. Stinson agreed, in principle, with Bartollas's opinion that improving Campbell's chances for a successful outcome following his removal from his mother's home would have required that Campbell be placed in an environment in which he felt safe and been provided mentoring and other services soon thereafter.

Stinson also noted that, in his opinion, Campbell is capable of functioning relatively well in structured environments. For that reason, Stinson expects that, if granted the clemency he is requesting, Campbell would probably function fairly well in general population, especially given his present age and physical condition.

### **Errors Were Committed During the Mitigation Phase of the Trial**

Thompson stated that guilt was properly conceded at trial and that Campbell's trial counsel were correct in focusing their efforts on the penalty, or mitigation, phase of his trial. However, he argued that two errors committed during the penalty phase—one by trial counsel and one by the trial court—render the outcome of that phase unreliable.

According to Thompson, Campbell's trial counsel erred in failing to introduce evidence of Campbell's detrimental experiences in state custody after he was removed from his mother's care at age ten. Jeffrey Smalldon, the clinical psychologist who testified for the defense at Campbell's trial, only briefly touched upon that period of Campbell's life and then only in relation to how institutional records made during that period characterized his upbringing during the first ten years of his life, Thompson argued. As a result, Thompson continued, the defense left a gap in the mitigation evidence—in that period of Campbell's life between age ten and adulthood—that the prosecution filled with its own false narrative. That false narrative included the suggestions that state intervention in Campbell's life when he was ten years old marked the arrival of positive changes in his life and that, with the state's intervention, Campbell could have overcome the damage done to him to that point. Thompson argued to the contrary that state intervention only compounded Campbell's problems.

William Mooney, one of Campbell's trial attorneys, prefaced his remarks by stating that he had been involved in two capital cases prior to Campbell's. Since Campbell's trial, however, he has been involved in approximately 30 capital cases and therefore has considerably more capital case experience today than he did then.

Mooney stated that he was struck by the horrific circumstances surrounding the first ten years of Campbell's life, and remains struck by it today. It is, Mooney urged, as bad as any upbringing he has seen in the thirty capital cases he has been involved in since.

Mooney indicated that while there was never any conscious decision by Campbell's trial attorneys to disregard that portion of Campbell's life from age ten to adulthood, he now feels that he and his co-counsel were remiss in not presenting more mitigation evidence in relation to that phase of Campbell's life. That oversight not only represented a missed opportunity to amplify the mitigation evidence already presented by demonstrating that Campbell was abused and neglected after age ten, it also left a hole in the mitigation evidence that the prosecution exploited by suggesting to the judge and jury that state intervention at age ten brought positive change in Campbell's life, effectively rescuing him from the abuse he suffered to that point. Mooney argued that the trial court and the jury were in fact misled by that false narrative, as evidenced by statements in the trial court's sentencing opinion noting that Campbell received educational opportunities following his removal from the family home and progressed socially thereafter.

Thompson argued that during the appeals process in the post-conviction proceeding, the United States Court of Appeals for the Sixth Circuit agreed that trial counsel omitted important mitigation evidence concerning Campbell's adolescent years and that the prosecution used the omission to its advantage. That court likewise found that Campbell's trial court improperly prevented his trial attorneys from arguing voluntary intoxication as a mitigating factor in Campbell's case.

Thompson explained that despite reaching those conclusions favorable to Campbell, the Sixth Circuit ultimately afforded Campbell no relief, holding that the omitted mitigation evidence was merely "cumulative" in nature or, if not cumulative, potentially more damaging to the defense than helpful. The Sixth Circuit also held that the trial court's preclusion of voluntary intoxication as a mitigating factor was "harmless error."<sup>6</sup> Thompson urged the Board to consider that in making its clemency

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<sup>6</sup> The Sixth Circuit noted that had a complete picture of Campbell's juvenile placements been presented, the jury would have heard evidence not only about the conditions of the facilities and the effects of those conditions upon Campbell, but also of Campbell's own inappropriate behavior at those institutions. As for voluntary intoxication, the Sixth Circuit held

recommendation, the Board is not bound by the same legal standards that led the Sixth Circuit to its holdings but is instead free to consider more evidence than that court or others could consider, including evidence of Campbell's mistreatment while in state custody and the potential impact that Bartollas and Stinson describe it having had upon Campbell's development.

### **Campbell Has Exhibited a Consistently Positive Adjustment During His Incarceration**

Rusnak stated that due to the psychological damage done to him during his upbringing and given the violence that he has exhibited while not incarcerated, it is apparent that Campbell cannot function in the free world but he has, however, demonstrated that he adjusts quite well to the structure of prison life.

Rusnak described Campbell's various incarcerations, noting that during his first incarceration from 1968 to 1971, Campbell displayed some negative behavior and a confrontational attitude that, according to Rusnak, was not surprising given his upbringing and mixed racial identity. But even during that first incarceration, Campbell was able to comport himself well enough to earn limited privileges.

Campbell's record during his 20-year incarceration from 1972 to 1992 is remarkably "clean," Rusnak continued. For much of that incarceration, Campbell was housed in an honor dormitory and was generally described by staff as being reliable, dependable, and cooperative. He took courses in accounting and business, and he regularly engaged in many volunteer activities and was even commended in 1990 for assisting institutional staff when an inmate fight jeopardized the safety of female correctional officers, Rusnak added.

Rusnak likewise described Campbell's present incarceration as generally positive despite recent conduct reports related to "hooch," and a recent conduct report in 2016 for fighting with another inmate. Both Rusnak and Stebbins described that fight as an attack upon Campbell by a much younger and stronger inmate and both urged that the fight was, at any rate, only an isolated incident in an otherwise positive institutional adjustment.

Rusnak conceded that Campbell struggled greatly when he was released on parole in 1992, noting that Campbell did not have the capacity to adjust to free society. As a result of the psychological damage he had sustained during his upbringing, Campbell was essentially overwhelmed by the absence of structure he experienced outside of prison. Today, Rusnak continued, Campbell accepts that prison is the only appropriate place for him, and he has made the best of that reality, maintaining positive relationships with institution staff and supporters outside prison. While conceding that general

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that preclusion of that evidence was harmless error because voluntary intoxication under Ohio law is at best a weak mitigating factor. During the clemency hearing, Thompson disagreed with both of the court's conclusions. Regarding the potential value to the defense of the additional mitigation evidence, Thompson argued that while it is true that some of the records detailing Campbell's adolescent years are not favorable for Campbell, those same records demonstrate that Campbell was indeed a product of his upbringing to that point. Thompson also argued that those same records would have demonstrated that Campbell continued to struggle with depression and anxiety even after he was removed from the family home and would have rebutted any presumption that state intervention ultimately had a positive impact upon Campbell. With respect to the Sixth Circuit's conclusion regarding voluntary intoxication, Thompson conceded that voluntary intoxication is not a particularly strong mitigating factor, but urged that, given the unusually psychologically damaging circumstances under which Campbell was raised and the heightened effect intoxication could thereby have upon him, evidence of voluntary intoxication could have helped to explain for the jury why Campbell behaved as impulsively as he did in killing Dials.



population would provide less structure than Campbell currently receives on death row, Rusnak insisted that general population would provide enough structure to ensure Campbell's long-term success.

### **Campbell Has Serious and Chronic Medical Conditions That Abate Any Risk He Might Pose**

Rusnak also argued that Campbell's serious and chronic medical conditions militate against his posing any kind of security risk to staff or other inmates. According to Rusnak, Campbell currently suffers from breathing difficulties brought on by COPD, emphysema, asthma, and lung nodules. Campbell's surgical interventions since being recommitted to prison include procedures to remove portions of his lung, thyroid, prostate, colon, and intestine, resulting in the use of a colostomy bag on a permanent basis. In addition to those maladies, Campbell's health-related issues also include problems related to his heart, cancer, pneumonia, sarcoidosis, and MRSA, Rusnak noted, describing Campbell as frail, weak, frequently short of breath, and unable to climb stairs or ambulate at more than a walking pace.

### **Campbell Accepts Responsibility for His Crimes and is Remorseful**

Thompson stressed that Campbell has consistently demonstrated genuine remorse and acceptance of responsibility. From the moment he was arrested, he cooperated with police and even offered to plead guilty prior to trial. Campbell makes no excuses for his crimes and blames no one but himself for them, Thompson added. Others who come into contact with Campbell—including Bartollas, Stinson, and Campbell's pen pals—all observe that same level of genuine remorse and acceptance of responsibility, Thompson related, urging that Campbell's contrition during his interview with the Parole Board was sincere and genuine.

Thompson stressed that in no way does he or his co-counsel contest Campbell's guilt. On the contrary, he conceded that Campbell has forfeited the right to live in free society. However, because Campbell had a childhood that destined him for disaster and for the other reasons advanced in support of the request for clemency, Thompson argued that requiring Campbell to spend the rest of his life in prison is an appropriate punishment.

Campbell's attorneys concluded their presentation by asking that the Board recommend that Campbell's sentence be commuted to life without the possibility of parole.

### **ARGUMENTS IN OPPOSITION TO CLEMENCY:**

Ron O'Brien, Franklin County Prosecuting Attorney, presented arguments in opposition to clemency.

O'Brien noted that he was involved with Campbell's case from its inception, having tried it in 1998. O'Brien described how, at the time of his escape, Campbell was being transported to Columbus for arraignment on robbery charges. An earlier gunfight with one of the robbery victims left Campbell with a gunshot wound, which in turn led to his misdiagnosis of hysterical paralysis. Campbell admitted to planning to escape from day one, O'Brien continued, and while he may not have known the precise time and place for that escape, he seized that opportunity when it arose.

On the day that Campbell escaped, Dials was using his lunch hour to pay a traffic infraction, O'Brien described. After being carjacked by Campbell, the pair drove around for several hours during which they purchased alcohol and Campbell consumed just *one* 40-ounce beer, O'Brien stressed, arguing

that at no time during trial did Campbell or his lawyers claim that Campbell was intoxicated. Rather, Campbell drove around thinking and planning, assuring Dials that he would not harm him and, at one point, exchanging clothing with Dials to further facilitate his escape. While parked behind the Kmart, Campbell heard the helicopters above him while the news on the radio described how police were searching for him. After Dials asked Campbell whether he was the man being described on the radio, Campbell directed Dials to lie on the floor board of the truck whereupon Campbell shot him twice execution style. Then Campbell attempted to carjack two other individuals, threatening both in the process, O'Brien summarized.

After describing the details of Campbell's escape and Dials's murder, O'Brien summarized some of Campbell's prior criminal activity, prefacing his remarks with the observation that Campbell is the most violent criminal that O'Brien has ever encountered. Campbell's violent criminal history began as a teenager with armed robberies in northeast Ohio, during one of which he shot a state trooper. After being released from prison for that offense, O'Brien continued, Campbell killed the son of the proprietor of a bar after playing multiple games of pool with the victim. O'Brien asserted that Campbell shot that man in the head for no other reason than that he is a violent human being.

O'Brien disagreed with Thompson's assertion that during the post-conviction appeals process the Sixth Circuit found trial counsel deficient, or ineffective, in failing to advance mitigation evidence related to Campbell's juvenile placements. What the court in fact held, O'Brien countered, was that *if* Campbell's trial attorneys were deficient in that regard, evidence related to Campbell's experiences after being removed from the family home was merely cumulative, resulting in no prejudice to Campbell.

Regardless, O'Brien added, evidence of Campbell's experiences from the time he was removed from the family home at age ten to the time he reached adulthood was *not* ignored by Campbell's trial counsel. Children services records detailing that part of Campbell's childhood were in the record and available to the jury, and those records were relied upon by Smalldon as predicate for his expert testimony. O'Brien recalled Smalldon being compelled by the trial court to copy those children services records for the prosecution and the prosecution then using some elements of them in the trial.

O'Brien conceded that Campbell's trial counsel did not emphasize his experiences after he was removed from the family home, and O'Brien speculated that Campbell's trial attorneys did not emphasize that time period because they believed that they had winning evidence in relation to his childhood up to age ten. Regardless, O'Brien continued, while perhaps not *emphasized* by Campbell's trial counsel, evidence of Campbell's experiences after being removed from his mother's care was not *ignored*. The jury was never misled into believing that the state "rescued" Campbell when it removed him from the family home, O'Brien added.

O'Brien acknowledged that Campbell had a bad childhood, although he suggested that given Campbell's propensity to lie and exaggerate the truth, some of what Campbell alleges occurred in the family home is probably fiction. O'Brien observed that although Campbell had a terrible upbringing, so too did his sisters, yet none of them went on to commit a murder, no less two.

Despite repeated psychological testing throughout his adult life, Campbell has never previously been diagnosed with PTSD, O'Brien noted, urging that even assuming for the sake of argument that Campbell does suffer from PTSD, it has nothing to do with murdering Dials. O'Brien emphasized that neither Bartollas nor Stinson draw a direct connection between Campbell's psychological

diagnoses and the murder but only suggest that it was somehow inevitable given his upbringing. Campbell was competent to stand trial, O'Brien continued, and even Smalldon conceded that Campbell, knowing the difference between right and wrong, made a conscious decision to kill Dials.

O'Brien argued that, in the end, as bad as Campbell's upbringing was, it was not mitigation that compared in any way to the aggravating circumstances presented in the case. He urged that capital cases like Campbell's, which involve the specification of a prior purposeful killing, are a rarity and if we are to have a death penalty in Ohio, Campbell's case is the poster child for it.

According to O'Brien, Campbell is a habitual liar who tells people what he thinks they need to hear to achieve his ends. O'Brien noted that Campbell's own defense psychologist, Smalldon, recognized that fact when he testified at trial that in creating Campbell's psychological profile he thought it important to corroborate what Campbell was telling him because of Campbell's habit of shading the truth. In the past, Campbell has falsely professed his innocence of the 1972 murder at the Friendly Tavern and has also falsely claimed to have graduated college, O'Brien pointed out. Campbell presented a strong case for parole in 1992, yet upon release he immediately reverted to his violent ways, O'Brien observed. The lingo Campbell uses is always the same—"I accept full responsibility," "I am sorry," "I want to be reformed"—but it is never anything more than the mouthing of words, O'Brien urged.

O'Brien stated that nothing he heard during the clemency hearing changed his negative perception of Campbell, noting that until very recently Campbell was making "hooch." Such a person is not someone who is deserving of clemency, O'Brien submitted.

O'Brien noted that at the time Campbell was on trial for killing Dials, he was already facing a very long definite sentence for the armed robberies he committed while on parole, a sentence that would far exceed his life expectancy. O'Brien stressed that because Campbell was already facing what was, in effect, a life sentence for those other crimes, had he not received the death penalty for killing Dials, he would have effectively suffered no penalty at all.

O'Brien concluded the State's presentation by asking that the Board recommend to the Governor that clemency be denied.

### **PAROLE BOARD'S POSITION AND CONCLUSION:**

The Ohio Parole Board conducted an exhaustive review of the documentary submissions and carefully considered the information presented at the clemency hearing. A majority of the Board has concluded that Executive clemency is not warranted based on the following:

- Campbell's upbringing and his experiences while a child in the care and custody of the state were certainly dysfunctional and no doubt traumatic. Having said that, in determining whether clemency would further the interest of justice in this case, that upbringing and those experiences must be weighed against the circumstances surrounding his crime, including the fact that he committed the aggravated murder of Charles Dials after being paroled on a prior murder conviction and that he killed Dials in the course of an escape that he facilitated by deceptively feigning paralysis. Those murders and other crimes committed by Campbell over the course of many years reflect a disturbing propensity to engage in extreme and senseless

violence, a propensity that never abated despite multiple incarcerations and attempts by the state to rehabilitate him. After balancing Campbell's upbringing against those competing considerations, a majority of the Board finds that clemency would not further the interest of justice.

- Notwithstanding his attorneys' characterizations of his overall adjustment to incarceration, Campbell's relatively recent institutional misconduct reflects a troubling lack of respect for institutional rules and regulations and an inability to control his own negative impulses.
- Campbell's jury was aware that for much of his childhood, Campbell was raised in an abusive and dysfunctional environment. The Board cannot say with any reasonable degree of confidence that the outcome of the trial would have been different had Campbell's trial attorneys placed more emphasis on additional mitigation evidence relating to the time he spent in the state's custody following his removal from his mother's care.

One member of the Ohio Parole Board has concluded that Executive clemency is warranted in this case based on the following:

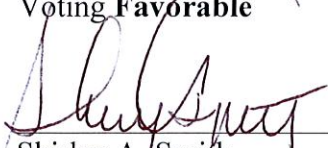
- The family home in which Campbell was raised was characterized by unstable, inhumane living conditions and the absence of any moral or other parental guidance from his parents, all of which prevented Campbell from maturing and developing psychologically and emotionally. Rather than improve his situation, Campbell's eventual removal from that home only served to further stunt his psychological and emotional growth, a reality that was never fully considered by the trial court or reviewing courts. For those reasons, granting Campbell the clemency he requests would further the interest of justice.

**RECOMMENDATION:**

The Ohio Parole Board with twelve (12) members participating, by a vote of eleven (11) to one (1), recommends to the Honorable John R. Kasich, Governor of the State of Ohio, that Executive clemency be denied in the case of Alva Campbell Jr.

Adult Parole Authority

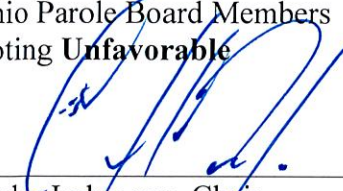
Ohio Parole Board Members  
Voting **Favorable**



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Shirley A. Smith

Ohio Parole Board Members  
Voting **Unfavorable**



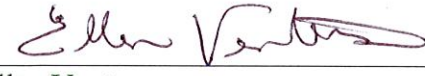
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Andre Imbrogno, Chair




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Kathleen Kovach



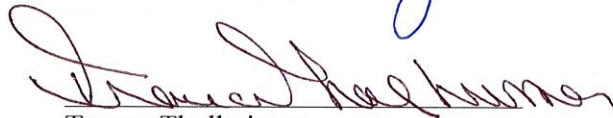
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Ellen Venters



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R.F. Rauschenberg



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Trayce Thalheimer



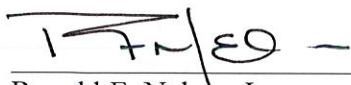
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Richard Cholar Jr.




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Marc Houk



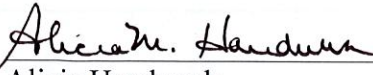
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Ronald E. Nelson Jr.



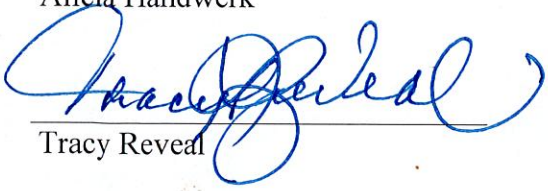
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Michael H. Jackson



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Alicia Handwerk



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Tracy Reveal