

**IN THE COMMON PLEAS COURT OF MONTGOMERY COUNTY, OHIO
CRIMINAL DIVISION**

STATE OF OHIO,	:	CASE NO. 2024 CR 03226
Plaintiff	:	
vs	:	JUDGE STEVEN K. DANKOF
JONATHAN ERIC LINK	:	MOTION FOR VIDEO TESTIMONY
Defendant	:	

Now comes the State of Ohio, by and through the Montgomery County Prosecuting Attorney, hereby respectfully requests that this Court allow witnesses for the State to appear via video for the jury trial scheduled for the weeks of December 8, 2025, and December 15, 2025.

Under the Ohio Rules of Criminal Procedure, the Court may permit the remote presence and participating of a witness for any proceeding if the Court gives appropriate notice to the parties, the court finds that the remote appearance of the witness is based on important state interests, public policies, or necessities of the case, the witness is administered the oath or affirmation using live two-way video and audio conference technology that allows the person authorized to administer the oath to verify the identity of the witness at the time the oath is administered, the witness is subject to full cross examination, and the video arrangements allow the witness to speak, and to be seen and heard by the court, all parties, and the jury. Crim. R. 40.

Retired Officer Thelma Barnes was a Police Officer employed with the Atlanta Police Department in 2001, and she resides in the state of Georgia, which is about an eight (8) hour drive

from Montgomery County, and is unavailable to travel to Montgomery County, Ohio, to testify in this case. Miss Barnes has indicated that she would be willing and able to testify remotely while he is out of state. Miss Barnes is an important witness for the State as she is able to testify to the documentation surrounding locating the victim's vehicle that was abandoned at the Atlanta Airport in 2001.

Allowing this witness to testify remotely accomplishes important state interests in that it would prevent the necessity of continuing the trial date. The witness would be subject to cross-examination, the Court would be able to properly administer the oath or affirmation, and the video capabilities of the Court would allow the witness to speak, and to be seen and heard by the court, all parties, and the jury.

For these reasons, the State respectfully requests these witnesses be permitted to testify remotely.

Respectfully submitted,

MATHIAS H. HECK, JR.
Prosecuting Attorney

By: /s/ Jacob P. Mosher
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing was sent to the following person on the same date as filing via electronic filing: Attorney for Defendant.

By: /s/ Jacob P. Mosher
JACOB P. MOSHER, #0093799E
Assistant Prosecuting Attorney