

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

**STATE OF OHIO**

**CASE NO. 2024 CR 3226**

**Plaintiff**

**JUDGE STEVEN K. DANKOF**

**vs.**

**Jonathan Eric Link**

**TRIAL STIPULATIONS**

**Defendant**

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The State of Ohio, by and through the Prosecuting Attorney of Montgomery County, Ohio and Dennis Lieberman, Attorney for Defendant, agree to the following stipulations:

**Stipulation #1: Identity of Shannon Anderson**

The State and Defense hereby stipulate and agree that the body discovered on August 16, 2001, in the vicinity of Brown Road and Stingy Lane in Ross County, Ohio was Shannon Anderson whose last known residence was 4516 Far Hills Avenue, Kettering, Montgomery County, Ohio.

**Stipulation #2: Recovery of the Burgundy Van**

The State and Defense hereby stipulate and agree that subsequent to September 11, 2001, Atlanta airport was reviewing their parking lots for vehicles that had been on the property for an extended period of time.

During that process, in the airport parking lot a Burgundy Oldsmobile Silhouette with Ohio License Plate CKK4244 was located. The vehicle was first documented on the Airport property on August 28, 2001.

Officer Thelma Barnes, of the Atlanta Police Department, impounded the vehicle. Running the plate number through a law enforcement database, it was found that Kettering Police Detectives were looking for this vehicle.

Contact was made with Kettering Police; Kettering law enforcement traveled to Atlanta, Georgia, and retrieved the vehicle with Ohio License Plate CKK4244 that was impounded by Officer Barnes.

The vehicle, accompanied by Kettering law enforcement, was transported to Kettering, Ohio.

**Stipulation #3: Known DNA Jonathan Eric Link**

The State and Defense do stipulate and agree that a known DNA standard was collected from Jonathan Eric Link by the Kettering Police Department. That DNA standard was provided to the Miami Valley Regional Crime Laboratory and was used by the Miami Valley Regional Crime Laboratory (MVRCL) and Bureau of Criminal Investigations (BCI) for comparison to evidence in this case.

**Stipulation #4: Known DNA Shannon Anderson**

The State and Defense do stipulate and agree that known DNA of Shannon Anderson was collected from her underwear that was collected from her residence, at 4516 Far Hills Avenue and from the body collected from Ross County. That known DNA was used by the Miami Valley Regional Crime Laboratory (MVRCL) and Bureau of Criminal Investigations (BCI) for comparison to evidence in this case.

**Stipulation #5: Fingerprint Analysis- Plastic Bag**

The State and Defense do stipulate and agree that the plastic trash bag that was recovered from the body of Shannon Anderson was examined and processed by Finger Print Expert Ron Houston, and no fingerprints were developed.

**Stipulation #6: Blue Carpet Fiber Analysis**

The State and Defense do stipulate and agree that the blue fibers taken from Carpet Cleaner with Brush, labeled as State's Ex \_\_\_\_, were sent to the Miami Valley Regional Crime Laboratory for forensic comparison to fibers from the Blue Van Carpet, labeled as State's Ex \_\_\_\_\_. Suzanne Noffsinger, a forensic scientist, found that the blue fibers from the carpet cleaner brush, and the blue fibers from the Blue Van Carpet were the same with respect to color, composition and microscopic characteristics.

**Stipulation #7: Finger Print Analysis- Red Van**

The State and Defense do stipulate and agree that the Red Van with Ohio License Plate CKK4244, recovered at the Atlanta Airport, was processed for Fingerprints by Officer Simoni and items from the Red Van were submitted for processing at the Miami Valley Regional Crime Laboratory. The items from the Red Van: gas cap, postcard, sticker, paperback book were all found to have no prints of value for comparison.

Two prints of value were recovered from the rearview mirror. Those were examined by the Bureau of Criminal Investigations analyst Ashley Owen and found to be fingerprints of Ambree Johnson, Shannon Anderson's daughter.

No other fingerprints that were of sufficient quality for comparison were located.

**Stipulation #8: BCI DNA Procedures**

With respect to the DNA evidence submitted to BCI, that was processed by BCI and compared by Forensic Scientist Erika Jimenez, the State and Defense do stipulate and agree that proper chain of custody was maintained by BCI, and that the procedures for processing the evidence were properly performed.

**Stipulation #9: Handwriting of Notes**

The State and Defense hereby stipulate and agree that the handwritten notes added to the police reports and binders in State's Exhibit \_\_\_\_ are the handwritten notes of Jonathan Eric Link the individual charged in this case.

**Stipulation #10:**

The State and Defense agree that Stipulations 1 through 8 will be submitted to the Jury as a Joint Exhibit.

The State and Defense agree Stipulation 9 relating to handwriting on the notes in the recovered binders does not waive his rights to re-assert his objection to the admissibility of the notes on other grounds. If that objection is overruled at trial the State and Defense agree that Stipulation 9 will also be included on the joint exhibit provided to the jury, under objection of counsel.

/s/ Lynda A. Dodd

LYNDA DODD (0068551)  
Assistant Prosecuting Attorney

Approved by Phone

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Dennis Lieberman (0029460)  
Attorney for Defendant

/s/ Jacob P. Mosher

Jacob P Mosher (0093799)  
Assistant Prosecuting Attorney