

**IN THE MONTGOMERY COUNTY COMMON PLEAS COURT
CRIMINAL DIVISION**

STATE OF OHIO

CASE NO. 24CR03226

Plaintiff,

JUDGE DANKOF

v.

**MOTION FOR BILL OF
PARTICULARS**

JONATHAN LINK

Defendant.

Defendant, Jonathan Link, hereby moves this Court for an Order requiring the State to provide the Defendant with a Bill of Particulars, pursuant to Ohio Rule of Criminal Procedure 7(E). The reasons for this Motion are more fully set forth in the Memorandum in Support hereof.

Respectfully submitted;

/s/ Dennis A. Lieberman

Dennis A. Lieberman (#0029460)

Flanagan, Lieberman & Rambo

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MEMORANDUM IN SUPPORT

Article I, §10 of the Ohio Constitution mandates that “in any trial, in any court, the accused party shall be allowed . . . to demand the nature and cause of the accusation against him, and have a copy thereof . . .”. This Constitutional provision is implemented through Ohio Rule of Criminal Procedure 7(E), which requires, upon request or upon court order, that:

“The prosecuting attorney shall furnish the defendant with a Bill of Particulars setting up specifically the nature of the offense charged and of the conduct of the defendant alleged to constitute the offense.”

In the present case, Mr. Link is charged with multiple counts, the most serious being an allegation of murder.

The Indictment in the instant matter merely tracks the language of the statute, and does not provide Mr. Link with notice of what acts he was supposed to have committed, which constituted the offense.

Mr. Link is clearly entitled to a Bill of Particulars. The discovery provided to the Defendant is not sufficient. Without such specific information, Mr. Link will be deprived of several critical constitutional rights; including his right to due process of law; and his right to confrontation of the State’s evidence; as well his right to the effective assistance of counsel. As a result it is respectfully urged that this Court grant the instant Motion for a Bill of Particulars and order the State of Ohio to produce a Bill of Particulars to the Defendant in the above captioned matter.

Respectfully submitted;

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Certificate of Service

I hereby certify that on this 22nd day of May 2025 this document was electronically filed via the Court's authorized electronic filing system which will send notifications of this filing to all parties.

/s/ Dennis A. Lieberman

Dennis A. Lieberman (0029460)