

THIS IS THE SWORN STATEMENT ANDREW HAINES

I, ANDREW HAINES, SWEAR THAT THE FOLLOWING STATEMENT IS TRUE:

1. That I was involved in a conspiracy to falsify evidence against, fabricate crimes by and deprive Jeff Keith of witnesses in his defense that began in 1995 and continues to this day.

2. This situation was sponsored by Assistant Cuyahoga County Prosecutors Carmen Marino, Steven Dever, Steven Canfil, Frank Gasper, Michael Nolan, Sean Gallagher, Lt. Dan Kovocic, Joe Sadie, an Arab policemen and the Organized Crime Unit of the Cleveland Police Department and its members Lt. Votipka and Detectives Henderson, Brady, Fryer and Fortenbaugh.

3. I talked directly to county prosecutors Marino, Canfil, Gasper and had dealings with prosecutor's Nolan and Gallagher to remain silent as to the conspiracy and its members in return for probation on August 27, 1996 and May 23, 1997 in Judge Kathleen Sutula's courtroom.

4. The prosecutors who were involved were all prosecutors against Jeff Keith in his cases: Frank Gasper was the prosecutor in the attempted murder hoax with Steven Dever, Joe Sadie and Dan Kovocic. Steven Canfil was the prosecutor against Keith in the Fuchs case where I was to be a witness for Keith. Michael Nolan was the prosecutor against Keith in his last case involving his son's estate where I also was to be a witness. Each of these prosecutors bribed me to appear before grand juries, fabricate evidence or not to testify against them or not to be a witness for Keith.

5. Instead of doing 35 years in prison Frank Gasper got me probation. Instead of doing a lot of time Michael Nolan dropped cases against me with the thought that I would testify against Keith, his daughter and a TAB investigator Chris Lawrence in obstruction of justice charges in 1999 and not testify for Keith in cases where Nolan was the prosecutor against Keith. The obstruction of justice cases were dropped and the prosecutors and police went back on their deal.

6. I had appeared at phony grand jury proceedings in March of 1997 with fellow conspirators and fabricated evidence against Keith, his daughter and Chris Lawrence. I was told to deny my own handwritten statements that I had written to Keith's attorney Jay Milano and Cuyahoga County Prosecutor Stephanie Tubbs Jones describing the conspiracy and the activities of its members. I wrote these letters in 1996 and 1997 and prosecutors and police were willing to do anything to get me to say that Keith forged the statements. It was totally impossible because my handwriting is that distinctive, besides Stephanie Tubbs Jones was aware of the situation because a black minister named Otis Newton had gone to her after I confessed the entire thing to him. Jones appointed an assistant county prosecutor named Ron James to investigate but he never came and advised me, so he couldn't have had much of an investigation.

When an exact duplicate of the statements, in my own handwriting, I had written to Stephanie Tubbs Jones surfaced as the result of a search of Keith's house, I was indicted by

Andrew Haines

Andrew Haines

SWORN AND SUBSCRIBED BEFORE ME A NOTARY PUBLIC ON DAY OF APRIL 2001.

C. Thomas Hardy

C. THOMAS HARDY
NOTARY PUBLIC, STATE OF OHIO
COMMISSION PERMANENT ORG. 11-1-01



Steven Canfil but assured that as soon as I testified against Keith everything would be taken care of.

8. The charges were dropped against Keith and his daughter but continue against Lawrence to this day, just to keep the truth from surfacing. I recently read an article from the Cleveland Plain Dealer that shows the police and prosecutors are still at it.

9. I had offered to be a witness for Keith in the Fuchs case and the case involving his son's estate. Both the prosecutors involved gave me deals not to testify after I appeared on Keith's witness lists. I am sure that they never told Keith or his attorneys about this because it is witness tampering as part of their efforts in fixing cases against Keith.

10. I was originally brought into the conspiracy by a government agent named Robert Winlock while we were both in county jail. Winlock offered to put me in contact with assistant county prosecutor Frank Gasper, which he did by a 3 way phone call, from jail. Gasper told me to "listen to what Robert said." Winlock then told me to back up his story that a "nigger", his cousin was hired by Keith to burn the cars of Michelle Kolman and that Keith had been in a power struggle with Joe Sadie in an Arab group that they had both belonged to and that Kovocic had been interested in the same girls as Keith so Keith wanted them out of the way. On March 1, 1996 I fabricated the report. By March 13, 1996 I had already written a letter to Keith's attorney Jay Milano recanting my statement and coming clean with the truth. Frank Gasper then found out about it and threatened me and offered me the deal to shut up and to accuse TAB investigator Chris Lawrence, Keith's daughter and Keith of bribing me for the statement. This was impossible because I only met Chris Lawrence after I had already written the statement to Milano and his private investigator had come to see me in county jail.

11. I have been threatened by the Organized Crime Unit and investigators from the prosecutor's office to have my probation pulled and had visits from both of them and taken to the Cuyahoga County Prosecutor's Office to see Carmen Marino, and also talked to assistant county prosecutors Canfil and Gasper over the phone to facilitate this conspiracy.

12. I have taped an audio tape with TV investigators recently as part of a program exposing these police and prosecutors for what they have done.

13. I was brought into this conspiracy by Robert Winlock, a government agent, who booked himself in the county jail as part of his ploy as a cop. He was taken out of the POD every day to visit the Organized Crime Unit and returned with cigarettes. Winlock promised me deals and they all came true even after I was indicted for denying my own handwriting. I was assured that after I testified in 1999 everything would be taken care of as it had for 3 years. I had every reason to assume that it would. My experience with the prosecutors in Keith's cases is that they are prepared to give you anything you want if you are prepared to help them fix cases.

14. There are numerous court records indicating the deals

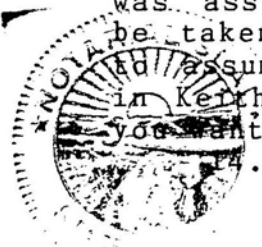
SWORN AND SUBSCRIBED TO BEFORE ME A NOTARY PUBLIC ON THIS 12th DAY OF APRIL 2001.

G. THOMAS HARDY
NOTARY PUBLIC, STATE OF OHIO
COMMISSION PERMANENT ORC 147.03

C. Thomas Hardy

Andrew Haines

ANDREW HAINES




I got that are available, I certainly could not have given these deals to myself. Judge Sutula was aware of all this, she was made aware of it at the time of sentencing by prosecutor Sean Gallagher in my first cases in August of 1996.

I am prepared to testify to the above facts and others should I be requested to do so.


Andrew Haines

SWORN TO AND SUBSCRIBED IN MY PRESENCE A NOTARY PUBLIC ON THIS
12th DAY APRIL IN 2001.


NOTARY PUBLIC



C. THOMAS HARDY
NOTARY PUBLIC, STATE OF OHIO
COMMISSION PERMANENT ORC 147 03



**Lake County Sheriff's Office
Inmate Reception**



Haines, Andrew E

Sex **M** Race **W** DOB **05/25/61** Age **37**

Booking # **97-00609** Inmate ID **LC00024508** SSN /# of Arrests **270727888 #001**
BCI **B016930** FBI **748740W1**

Hair **BRO** Eyes **BLU** Build **AVERAGE** Complexion **MED** Height **510** Weight **180**
Ethnicity **USA** Marital Status **Married** Beard **Y** Mustache **Y**

Address **1171 Holmden Ave. Cleveland OH 44109**

Occupation _____ Employer _____

Attorney **DiFranco** Emergency **Jannie**

Phone 1 **Home (216) 241-3307** Phone 2 **Emer (216) 241-3307** Phone 3 **()**

Sentence Start Date	Days Sentenced	Days Credited	Expected Release Date and Time	
//	0	0	11/16/99	1300

ALIASES = Last:Anthony First:Mark DOB:05/25/60; Last:Harmes DOB:05/26/61; Last:Harnes

CHARGES: Courtesy Hold () Cuyahoga County Outside County CR346749/34656 \$0.00 Hold

No Holds Found

HAZARDS AND ALERTS = (type) Prot Cust (description) can ONLY go to 5A for phones and TV. Tower please watch this i/m carefully for any problems.

SCARS, MARKS & TATTOOS tattoos r bicep both sides of chest left shoulder scar left elbow

Arresting Officer/Agency **Moran Cuyahoga County**

Booking Officer **SO151**

Date/Time In **02/12/97 1753**

Not on file

I have received and will read a copy of the Inmate Rules of Conduct for the Lake County Adult Detention Facility.

Inmate's Signature

Date

Time

Officer's Signature

SWORN STATEMENT

MARION COUNTY

Sworn to and subscribed to before me a notary public on day of October 2001.

After being duly sworn I, Andrew E. Haines, SS #270-72-7888, D.O.B. 5-25-61 swear the following statements are true:

1. That I and other government agents, specifically Robert Winlock, entered into a conspiracy to commit crimes against Jeff Keith, his family members and a member of the media. My part began in and around 1995 and lasted until July of 1999.
2. As agents we were given specific instructions by the Organized Crime Unit of Cleveland Ohio; Dets. Brady, Henderson, Fortenbaugh and Lt. Votypka. We were also encouraged to fabricate evidence by Investigators Wegas and Riley of Cuyahoga County Prosecutors Office,
3. To do these acts we were given money by the Organized Crime Unit or the Cuyahoga County Prosecutor's Office or high reduction of sentences or both.
4. Our activities were planned or carried out in Cuyahoga, Lake and Lorain County with results in as far away counties as Ottawa and Franklin Counties.
5. Different forms of entrapment schemes and intimidation schemes were carried out against Jeff Keith by myself and Robert Winlock while Keith was in Cuyahoga County Jail and Lorain Correctional Institution. Both the Organized Crime Unit and Investigators Wegas and Riley were in contact with authorities

NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES APRIL 5, 2005
REGISTERED IN MARION COUNTY, OHIO

Andrew E. Haines
Andrew E. Haines

Sworn to and subscribed before me and my
of October 2001. *Wm. H. Haines*
Notary Public on 10 day

NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES APRIL 5, 2005
REGISTERED IN MAHON COUNTY, OHIO

Andrew E. Haines
Andrew E. Haines

at Lorain Correction Institution to facilitate our plans. I am sure there are records of their contact and records of Robert Winlock and my own available.

6. Members of the Organized Crime Unit talked to me directly about the fabrication of evidence against Keith. I talked to prosecutors directly about this.

7. The situation became so bizarre that Lt. Dan Kovocic Commander Joe Sadie, an Arab, in conjunction with Assistant Cuyahoga County Prosecutor Steven Dever fabricated an attempt murder hoax against themselves, using us, and blamed Keith it. When they got caught they used us to cover it up.

8. As agents of the government we were assured that we could commit any crime and we would be paid for it. For the most part this was true until it became obvious that the public officials and police were going to get caught at it.

9. I completely renounced my part in these crimes in 1999 and have recently taped an interview with Jeff Harwood for N.B.C. news.

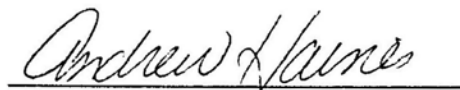
10. On April 25, 2001 Robert Winlock confessed to all of this on the air. N.B.C. had the documents to back up his story.

11. There is no question that crimes were committed against Jeff Keith while he was at Lorain Correctional Institution. These crimes were supposed to be added to charges that were being brought in Cuyahoga County that were obstruction of justice charges.

12. The Organized Crime Unit attempted to say that Keith had sent a mailing from Lorain Correctional Institution to 79

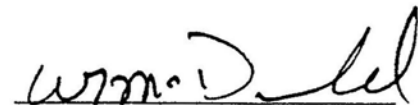
judges and notables, when in fact we all knew that he didn't. Investigators from the Cuyahoga County Prosecutors Office and the Organized Crime Unit had to have it stopped so they had Keith investigated by Lorain Correctional Institutional Officials and then had us begin intimidation and entrapment scams against Keith when we got to Lorain Correctional Institution. I am sure that Inspector Monyak was informed of these events because I heard his name mentioned a number of times as a contact person they were using to investigate Keith.

If called upon I will testify to these facts. I was brought into this conspiracy against Jeff Keith by Robert Winlock a long term government agent.



Andrew E. Haines

Sworn to and subscribed before me a notary public on this 10th day of October 2001.



Notary Public

W.F. McDONALD
NOTARY PUBLIC, STATE OF OHIO
COMMISSION EXPIRES APRIL 5, 2005
SHEPHERD IN MARION COUNTY, OHIO

DATE: March 01, 1996

TIME: 15:45 HRS.

PAGE: 1

ORGANIZED CRIME INTELLIGENCE UNIT

The following is the statement of Andrew E. Haines, W/M, DOB: 05-25-61, SS# 270-72-7888, Home Address: 1171 Holmden Avenue Cleveland, Ohio 44109 Home Phone: 241-3307.

On January 2, 1996 at around 5:00 p.m. when they took me to 7-D pod at that time there was a correction officer working the pod by the name of Rodriguez. Mr. Rodriguez did not understand English that well. He had my floor card when they brought me up. On that floor card it stated that I was a member of the Aryan Brotherhood. Jeffery Keith happened to be standing by the desk speaking with Officer Rodriguez when I came on the pod. The officer ask Jeffery Keith if he knew what the Aryan Brotherhood meant. Jeffery Keith started to explain to the officer what it was as I was walking away. Jeffery Keith also noticed while I was doing push ups in the pod my tattoo over my right chest area which is the Aryan Brotherhood tattoo. When he found out that I was suppose to have been a member he was drawn toward me. He started talking to me asking me questions. He asked me if the Aryan Brotherhood was involved in the dealing of drugs, contract killings, what religion they followed. I just played along. I did not tell Jeff that I was no longer a member.

The reason that I believe that Jeff Keith trusted me was because of the Aryan Nation and because I had been to prison before. As time went on he began to tell me more and more about himself. He said that he was back from Lorain Correctional on appeal. He was recently out on a appeal bond but it was revoked. He told me that the arson cases were about five cars being torched and a garage. He told me that three of those cars belonged to a girlfriend of his. He kept mentioning the names Fannie and Michelle. He was never specific as far as who the cars belonged to. He did however say the reason for the cars being burned was because a man from the Arson Unit by the name of Kovacic was screwing one of these girls. Keith felt it would be funny to have the cars burned because of the connection between the girl and Kovacic, the Arson Unit. Keith stated to me that he had some "nigger" do his dirty work for him in regards to burning the cars. He went on to say that this guy Kovacic had a friend named Sadie and together they set a lot of stuff up as evidence because they never had enough evidence to convict him in the first place.

Jeffery Keith while we were in the pod together, I saw him in conversation with a Robert Winlock. What those conversations were, I did not know until later on. The day that Robert Winlock was getting off of the pod I ask him why they were moving him. He told me that he couldn't say anything at that time and I would know more tomorrow. At that time a corporal ask me to step away from Winlock's cell. I had no further contact with him at that time.

Andrew E. Haines

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While Jeff Keith and I were talking he brought up this organization which was Arab business men called Cameo. Exactly what Cameo stood for I don't know. He never explained that to me. He did say however that it had a lot to do with fund raising, campaign contributions for judges and councilmen and that sort of thing. It had a lot to do with money. Jeff went on to tell me about a Sadie being involved in Cameo as a spokesperson. That Jeff and Sadie were going through some sort of power struggle as to who was going to run this organization. That is another reason that Jeff felt that they used set up evidence against him in his arson cases. It was because Sadie was a friend of Kovacic's. Keith also told me that he was having a relationship with a guy's daughter named Farage. Keith had dumped her and there was animosity between this guy Farage and him because of this. Jeff also stated that Sadie and Farage were real close friends and Farage had a lot of influence in setting up evidence in reference to Jeff's arson cases. Keith had made the statement that he was going to get them (Farage and Sadie) someday because they had ruined his life and career. Keith also stated that the prosecuting attorney for his arson cases was very heavily influenced by Farage and his organization Cameo. Keith said that the prosecutor had something to do with the tampering of evidence that had gotten him convicted. At a later time I found out that the name of the prosecuting attorney was Steve Dever.

After Robert Winlock was moved off of the pod Jeffery Keith was really nervous and upset. He came to me and ask me if I trusted Winlock. I told him that I didn't trust anyone including him. Jeff stated that he felt that he had fucked up as far as Winlock was concerned. He felt that Winlock had went to the Unit that he was working for and snitched him out but he would not know if that was true or not until the near future. The following morning was when the newspaper article came out about the attempted murders as far Jeffery Keith was concerned. Jeff was pretty upset about it and went to make a phone call. When he came back from the phone he asked me point blank if I wanted to make twenty thousand dollars. I asked him what he was talking about. He received his incitements at that time. I read the incitements. I realized the seriousness of what was going on. I remember the incitements read an attempted murder on a Kovacic, a guy Sadie, and Dever (that is when I found out that Dever was the prosecuting attorney of Keith's case). There was also a intimidation charge and an attempted arson charge. After I had read the indictments Jeffery Keith was holding them in his hand and he said these are the mother fuckers that I was going to have Winlock take care of. He was pointing into the incitements. He went on to ask me if I was willing to kill Winlock for twenty thousand dollars or if I knew someone within the Aryan Brotherhood who could do it. He offered me my bail paid for the charges that I am presently in jail for and he would pay his attorney Milano to handle my present cases. He went on to say that he would almost guarantee that I would get out of my present trouble because his attorney was one of the best in Cleveland. He also said that there was a person named Glen (no last name) that he wanted taken care of as well for snitching on him. Jeffery Keith went on to say that if I took care of all this stuff I could be set for the rest of my life. He said that the only person who could testify against him as far as the attempted murders were concerned was Winlock and that is why he wanted him taken out. Keith also stated that when the time came that he would be able to find out where Winlock was at

Andrew E. Haines

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because he used to run the Justice Center and a lot of people owed him a lot of favors.

It was about two or three days later that they moved Jeffery Keith off of the pod and put him in isolation. Before he left the pod, he gave me his home phone number which is 888-6149. He told me that any messages could be relayed through his daughter Christine and for me to call. I have since talked to Christine on the phone. Her father has been unable to call her since he has been in isolation. She has received three letters from his father since he has been in the fish bowl. She said that there has been no mention of me other than to accept my calls.

A couple of weeks ago an individual by the name of Robert Thomas came back from Lorain Correctional to testify about an escape case. When Thomas came on the pod all of the guys were getting ready to sit down to eat dinner. Thomas said that he had spoken with Jeff. Jeff said that there was a twenty thousand dollar contract on Winlock's life. Present at the table was Anthony Coe, Tom Brozinski, and Dan Misch.

On Wednesday February 28, 1996 I spoke with Sgt. Henderson in regard to all of this. The conversation took place on the 7th floor visiting room. There was a correction officer present. I don't know his name. Yesterday on Thursday February 29th I went by the holding cell where Jeffery Keith is presently at (the fish bowl). He saw me and he pointed at me. He made a gesture like he was shooting a gun at me. He then blew on his finger like he was blowing the smoke off of a gun.

Q. Did anyone in the Police Department-or-this unit promise you anything for this statement?

A. No, I am volunteering this of my own free will.

Q. Do you care to add anything further to your statement at this time?

A. No

Q. - After having read this statement, is it the truth?

A. Yes SIGNED Andrew E Haines

WITNESS Richard Henderson, Det

WITNESS James Brady, Det #1596 Paul Fugate #2425

TAKEN BY Det Pamela Fortenbaugh #407
Det. Pamela Fortenbaugh #407