

Affidavit of Wilbur Jeffrey Lewis

I, Wilbur Jeffrey Lewis, state under oath and penalty of perjury that the following statement is true and correct to the best of my knowledge and recollection:

1. My name is Wilbur Jeffrey Lewis.
2. My date of birth is July 3, 1969.
3. I have known Danny Smith, Raymond Smith, and Stanley Jalowiec for a number of years. I know these individuals because I grew up in the town of Lorain, Ohio and have continued living here since 1980.
4. In 1994, I was a member of a motorcycle club in Elyria, Ohio. At that time, Danny 'Boo-Boo' Smith and Raymond 'Jack-Frost' Smith frequented the club. The Smith's tried to sell drugs to members of my club on a regular basis.
5. Sometime in 1994, Raymond (Jack-Frost) approached me and asked if I could introduce him to someone willing to take out an informant against him. Raymond offered five thousand dollars in exchange for dealing with his informant. No one was with Raymond when he approached me. I told Raymond that I wanted nothing to do with 'taking care of' the informant in his drug case. I told him that I also did not want nor need any trouble or attention from the police and advised him to not bring his problems to the clubhouse or he would be forbidden from returning.
6. A short time later, I learned that the informant in Danny and Raymond's case was found dead in a Cleveland cemetery.
7. Within a day or two of the murder, I had a conversation with Danny outside the clubhouse. I told him that I heard he had handled his problem. Danny replied by stating "yeah, we handled our business." I told Danny that I did not want any attention brought to my clubhouse. I told Danny that if the police were after him for the murder, then he should stay away from our club. I didn't want the heat brought down on us too.
8. I also had the opportunity to speak with Raymond in regards to the incident. Raymond stated that he, Danny, and his other son Michael had killed the informant.
9. I was eventually arrested on a separate case at some point in December of 1994. Because of this arrest, I was incarcerated in the Lorain County jail with Raymond, Danny, and Stanley. I was moved around to different pods during my incarceration. Because of these movements in the county jail, I have been on pods with both Raymond and Danny. I recall that Raymond and Danny were on separate pods during my stint in the county jail.
10. While in the jail, I had numerous conversations with Raymond and Danny about their murder case. Raymond always maintained that he and his sons had 'taken care of the problem' themselves. Danny stated on numerous conversations that he took care of the

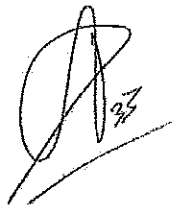


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informant with his father Raymond and brother Michael. Raymond and Danny never implicated Stanley in this incident.

11. I also recall that Danny was worried about what his brother Michael was going to say. Danny made three-way calls to Michael from the jail. I know this because Danny asked me on numerous occasions to help make these three-way calls. Danny kept trying to get in touch with Michael through various girls that Michael hung around.
12. After I was convicted, I was sent to Mansfield Correctional Institution. I became a worker at Mansfield. My job at Mansfield was to take care of the death row food cart. Because of this job, I had the opportunity to speak to Raymond and Stanley. I was able to speak with Raymond and Stanley often over the next several years as I was assigned to work in the "Death Row" area. Stanley always maintained his innocence. More importantly, Raymond always maintained that he and his sons had 'taken care of the problem' by themselves. Not once did Raymond ever implicate Stanley.
13. I know that Stanley Jalowiec is innocent of the murder for which he was convicted. I know that Stanley is innocent because the real killers confessed to me. Danny Smith and Raymond Smith, on numerous occasions, told me that they committed the murder with Michael Smith. Raymond and Danny never once implicated Stanley in the murder of their informant.
14. I am giving this statement of my own free will. This statement is the truth to the best of my knowledge and recollection. I have not been coerced nor promised anything in exchange for this statement. If called upon to testify, I could do so competently.

Name:

Wilbur Jeffrey Lewis
Wilbur Jeffrey Lewis

Date:

5/3/12

Sworn and subscribed in my presence this 5 day of MAY, 2012.

[Signature]

NOTARY PUBLIC

