

EXHIBIT A

STATE OF OHIO :  
: SS.  
COUNTY OF LORAIN :

AFFIDAVIT

Now comes Sarah Jalowiec being first duly sworn according to law, and states the following:

1. I am the mother of the defendant Stanley Jalowiec. I testified during the penalty phase of Stanley's trial. The day before I testified, Stanley's attorney told me to "get up and tell what you can." That was the extent of my preparation. I was very nervous when I testified.
2. During my mitigation testimony, I talked about Stanley's perfect elementary school attendance, dropping out of high school, his love of animals, his arthritis and its effect on school and work, his relationship with Jackie and her children, drugs and alcohol, and other charges and offenses. However, there was a great deal about Stanley that I did not say because I was not asked about it.
3. Stanley was born at Elyria Memorial Hospital. Stanley was always very active. As a baby, he went through three cribs. He shook them 'until they came apart. He was hard as hell to get to sleep. I was up all the time with him. Eventually, he would wear himself out.
4. He was always getting into things. When he was nine months old he climbed up cupboards, onto the refrigerator, and climbed to wedge himself between the highest cupboard and the ceiling. As a toddler, Stanley reached up and pulled a sewing machine on to himself. When he was two or three, he drank kerosene from a lamp that he had pulled apart. When he was four or five, he chewed a child-proof cap off his father's pain pills and ingested the pills. He was taken to Elyria Memorial Hospital for the kerosene and pills incidents; he was taken to the hospital on other occasions, including cutting his head open by banging it on his crib. On one trip to the hospital, he was checked for child abuse, because of a cut head and bruises. He just moved and didn't think.
5. As a child, Stanley even ran into cars, *Because he wasn't paying attention* *SJ* ~~on his bike~~. He would run around and flip over the couch. He became involved in gymnastics at the suggestion of his second grade teacher. He really liked gymnastics, but his arthritis, diagnosed in the 6th grade, ended his gymnastics involvement.
6. When he was in the first grade, Stanley was taken to the Cleveland Clinic for evaluation and was diagnosed with "hyperactivity." The doctor at the Cleveland Clinic said Stanley had minimal brain damage. Stanley was also seen by a Dr. Shaffer [sp.] on Broad Street in Elyria. Stanley took Ritalin from the 1st grade until the 6th grade. I then

Exhibit  
57

Case No. 08-3249  
Jalowiec v. Bradshaw  
Warden's Appendix Pg. 4546

took Stanley off the Ritalin because I was worried about Ritalin reports I saw on the television and was afraid of side effects. When Stanley was on the Ritalin, he sometimes just sat there . . . not like a kid, like a zombie.

7. Stanley was a Cub Scout. I became a den mother because the other Cub Scout groups didn't want to deal with the children with behavior difficulties. They gave me all the rowdy boys, but I didn't have problems with them. Stanley stayed in Cub Scouts until it was over.

8. Stan's imagination got him in trouble. His relationship with an imaginary monkey, Bear, started when he was real little. Stanley had a stuffed monkey, and he always wanted monkeys for presents. If Stanley misbehaved, he said, "Bear did it" or "Bear told me to do it." The school raised concerns about Bear when Stanley was in the 6th grade. Stanley went to counseling. The counselor said Stanley knew what he was saying. I was never concerned that Stanley might have some serious psychological problem. Stanley still talks about Bear.

9. As a child, when Stanley got really angry, he would cry. As he got older, he would often still cry and/or run his mouth. He's very sensitive.

10. Stanley attended Learning Disability (LD) classes at East Carlisle Elementary School and Midview Middle School in Grafton. After middle school, Stanley attended SBH (Severe Behavior Handicap) classes at Edison School in Elyria. He briefly attended Elyria High School before dropping out of school at age 17.

11. Stanley never did very well in school. When he was younger, he couldn't sit still, was often out of his seat, and talking when he wasn't supposed to talk. As he got older, the disruptive behavior continued and he had a problem with running his mouth. Stanley would say things before thinking. When Stanley was learning to write, he had problems; his teacher referred to the problem as "dyslexia." He did, and has always, enjoyed drawing. I think that maybe Stanley was kept at Edison too long. For a while, he was doing better and wanted to go to regular school, but he had to stay at Edison longer. I think he gave up and that by the time he got to Elyria High School, he didn't care.

12. Stanley got along with all family members. He is especially close to Tammy; she is only 13 months younger than Stanley. The only difficult relationship has been with Jim Morrison, my boyfriend. All the children had a hard time with our divorce and my relationship with Jim and Jim had a hard time with the children. The children, including Stanley, fought with Jim. None of the kids got along with Jim at first. Jim is the only person I ever saw Stan violent with. The only time I witnessed Stanley being violent towards Jim was when Stanley was age 16 and arguing with Jim. Stanley picked up some numchucks and hit Jim on the side of the head. Stanley cried after he hit Jim.

13. I put Stanley out of her house when he was 18 because people he knew were around the house day and night. Stanley didn't live by the home rules. Stanley lived a

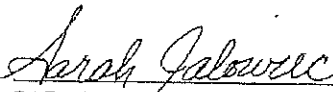
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number of places after that: with Jackie, with Tammy, in motels, in tents, and other places.

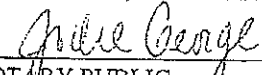
14. On January 19 at 4:30 a.m. Stanley was sleeping on my living room floor. I had gotten up at 4:30 to get ready to go to work (at York International). I am sure of the date because that was the birthday of my step-father, Clyde Les Davis. I believe that the information was not used because the attorneys told me they did not need any of this because there was not much evidence to convict him [Stanley].

15. I would have testified to the above had I been prepared for my testimony or at least told ahead of time that I would be testifying.

FURTHER AFFIANT SAYETH NAUGHT.

  
SARAH JALOWIEC

SWORN TO AND SUBSCRIBED in my presence this 17<sup>th</sup> day of March, 1997.

  
NOTARY PUBLIC

Commission Expires: 8/1/97

SG