

IN THE PARMA MUNICIPAL COURT
CUYAHOGA COUNTY

STATE OF OHIO
CITY OF PARMA
CUYAHOGA COUNTY

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CASE NO: 0518341
JUDGE TIMOTHY GILLIGAN

ORDER
AND JOURNAL ENTRY

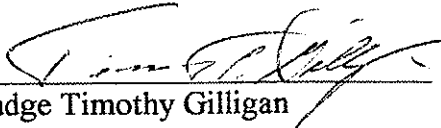
This matter came before the Court upon a Motion of the City of Parma, for an Order compelling Planned Parenthood, under penalty of law, to submit to the Chief of Police, Det. Thomas Connor, a copy of all medical records of [REDACTED] [REDACTED] [REDACTED]

Based upon specific facts presented to the Court, the Court finds that there are reasonable grounds to believe that the medical records sought are relevant to an ongoing criminal investigation.

IT IS ACCORDINGLY, ORDERED AND ADJUDGED THAT Planned Parenthood shall forthwith provide a copy of all medical records of [REDACTED] [REDACTED] [REDACTED] to Det. Thomas Connor of the Parma Police Department to enable the latter to determine if there has been a violation of Ohio Revised Code.

Given under my hand this _____ day of March, 2006.

MAR 28 2006



Judge Timothy Gilligan
Parma Municipal Court

IN THE PARMA MUNICIPAL COURT
CUYAHOGA COUNTY

STATE OF OHIO
CITY OF PARMA
CUYAHOGA COUNTY

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CASE NO: 0518341
JUDGE TIMOTHY
GILLIGAN

MOTION FOR
RECORDS

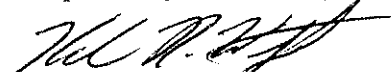
Now comes the City of Parma, by and through its Prosecuting Attorney Karl R. Wetzel on behalf of the City of Parma Police Department, respectfully moves this Honorable Court for an Order compelling Planned Parenthood to produce a copy of all medical records of [REDACTED]

Said records, to be provided forthwith to Det. Thomas Connor, of the Parma Police Department.

The reason for the Motion is to obtain a copy of all medical records of [REDACTED] [REDACTED] It is believed that the information sought tends to establish violations of Ohio Revised Code 2907.02.

Accordingly, for the aforementioned reasons and the reasons stated in the attached affidavit by Det. Thomas Connor and to fully investigate this matter, the City of Parma respectfully requests this Honorable Court to issue the attached Order requiring Planned Parenthood to submit and provide a copy of all medical records of [REDACTED] [REDACTED] to Det. Thomas Connor.

Respectfully Submitted,



KARL R. WETZEL
Assistant Prosecutor
City of Parma
5555 Powers Blvd.
Parma, Ohio 44129
(440) 887-7300

PARMA MUNICIPAL COURT
CUYAHOGA COUNTY, OHIO

STATE OF OHIO
CITY OF PARMA

COUNTY OF CUYAHOGA

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JUDGE TIMOTHY GILLIGAN

SS: AFFIDAVIT OF
DET. THOMAS CONNOR

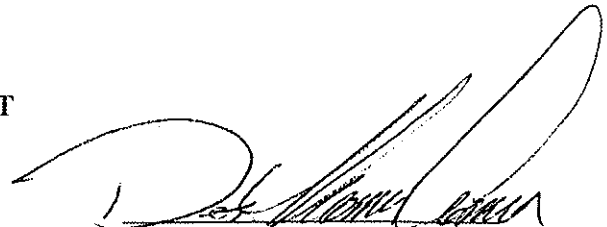
Det. Thomas Connor, being first duly sworn according to law deposes and states that he is a member of the Parma Police Department assigned to the Youth/Sex Crimes Division.

The facts upon which affiant bases such belief are as follows:

1. Affiant avers that on July 19, 2006 a report was received by the Parma Police Department from the West Des Moines, IA Police Department. The report stated that [REDACTED] [REDACTED] was sexually assaulted by Joseph Coles DOB: 10-14-65, [REDACTED]
2. Affiant avers that on July 19, 2006 [REDACTED] was interviewed at the Parma Police Department. [REDACTED] stated in the interview that she had two (2) abortions, in which Joseph Coles was the father. [REDACTED] stated that the first abortion occurred when she was 12 years old. The second abortion occurred in June or July of 2004.
3. Affiant avers that on July 22, 2005 three (3) subpoenas were sent to various abortion clinics in the greater Cleveland area, requesting medical records of [REDACTED]
4. Affiant avers that Cleveland Surgi-Center, Inc. responded to their subpoena, providing the Parma Police Department with information verifying that [REDACTED] did have and abortion at age 12 at their facility.
5. Affiant avers that on March 15, 2006 a subpoena was sent to a few other abortion clinics in the greater Cleveland area.

6. Affiant avers that as a result of the subpoena, Isaac Schultz, Attorney, for Planned Parenthood called and stated that [REDACTED] was treated at their facility however, the dates on the subpoena were incorrect.
7. Affiant avers that as such it necessary to obtain said records.

AFFIANT FURTHER SAYETH NAUGHT



DET. THOMAS CONNOR
PARMA POLICE DEPARTMENT

Sworn to before me and subscribed in my presence on the _____ day of
MAR 28 2006 2006.

MAR 28 2006 
JUDGE TIMOTHY GILLIGAN