

In the State of Ohio     )  
                                   ):ss  
In the County of Scioto )

I, Sean Swain, being duly sworn, hereby depose to state:

1. I am competent to testify to the facts related herein, to which I have direct knowledge.

2. I believe I know who anonymously posted U.S. District Judge Benita Y. Pearson's home address online. I write this sworn declaration for purposes of full cooperation with my legal counsel and with the Federal Bureau of Investigation, and I authorize for this declaration to be scanned, posted, and re-posted everywhere.

3. In 2012, Ohio Department of Rehabilitation and Correction's office of legal counsel approved a new policy, outsourcing prisoner financial transactions to an out-of-state corporation. ODRC counsel's office did not recognize the illegality of transferring sensitive information of prisoners' visitors without their consent. When I later exposed the illegality of this policy, I was taken from population at Mansfield Correctional and treated like a terrorist.

4. The principle engineer of the torture regimen was ODRC Counsel Trevor Matthew Clark, Esquire. Clark's office had bungled the review of JPay policy, and sought to silence me to avoid exposure of their failure.

5. At the same time, computer-generated materials emerged at Mansfield, ostensibly produced by the Army of the 12 Monkeys. For reasons described herein, I have reason to believe that these materials were really generated by Trevor Clark, who created the Army of the 12 Monkeys in order to create a "crisis" that he could then solve by neutralizing me.

6. In March 2013, Trevor Clark interrogated me. During that interrogation, Clark alleged that the Army of the 12 Monkeys had sent typed letters to senators and representatives, threatening their lives. He said that my typewriter, which was confiscated the previous September when I was first tortured, matched the typed letters sent to senators and representatives.

7. As point of fact, my typewriter was confiscated. However, the typewriter turned in to the Bureau of Criminal Investigations was a different model than my typewriter. This means that somewhere in the chain of custody, my typewriter was exchanged for a different typewriter. That second typewriter "matched" the 12 Monkey threats. The implication is, someone who is ODRC staff must have typed the 12 Monkey threats to senators and representatives and then attempted to switch the typewriters, implicating me.

8. I believe that staff member who switched the typewriters in the chain of custody is ODRC Counsel Trevor Clark. I believe he created the Army of the 12 Monkeys to create a crisis at Manfield Correctional and then used a Swintec typewriter to type threats to senators, intending to switch typewriters when mine was turned in for testing. The problem was that my typewriter was a different model. My typewriter was a 2410 and the typewriter that Trevor Clark used to frame me was a 2416DM CC.

9. During his interrogation of me, Trevor Clark gave me a listing of Ohio lawmakers' home addresses. This was no doubt the listing he used when he typed the death threats to lawmakers he hoped to falsely attribute to me. The fact that Trevor Clark, a licensed attorney, gave the home addresses of Ohio lawmakers to a prisoner convicted of murder and accused of starting his own terrorist network in prison (that threatened lawmakers) is totally and completely inexplicable in any other way, unless Trevor Clark intended to again create a "crisis." I have, in a prior affidavit, listed several lawmakers' home addresses that I memorized from Trevor Clark's list.

10. Consider the implications of ODRC Counsel Trevor Clark giving a convicted killer the home addresses of Ohio lawmakers. First, Clark is not from Ohio. He lists his hometown as Moundsville, West Virginia, on his Fit Club profile. This

means that Clark carpet-bagged an Ohio state job and used that job to obtain sensitive information on Ohio lawmakers, which he then shared with a convicted killer in an Ohio prison. There exists no rational, reasonable explanation for such conduct.

11. This address list also demonstrates that Clark had access to lawmakers' addresses when the "12 Monkey" threats were typed... on a typewriter that an ODRC staff member attempted to switch for my typewriter in order to frame me. Taken together, this indicates to me that Trevor Clark is the likely creator of the Army of the 12 Monkeys and their threats sent to lawmakers.

12. In all of this chaos, the illegality of JPay policy and his bungled review of that policy was overlooked.

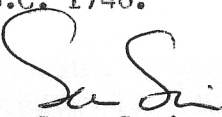
13. After Trevor Clark gave me lawmakers' home addresses, I attempted to alert the appropriate authorities including the Office of Disciplinary Counsel. They took no action against Clark. Clark retaliated against me and blocked my phone access for 8 weeks for reporting his misconduct. He further alleged falsely that I accused him of sexual abuse and attempted to locate his home address, both claims completely untrue and baseless.

14. I now have a civil rights action filed in federal court, presided over by The Honorable Benita Y. Pearson. Judge Pearson is, I believe, the most fortuitous assignment I could have received in the U.S. District Court for the Northern District of Ohio. I believe my chances of success in this pending civil action are very good. Thus, I perceive that Trevor Clark has motive to again create a "crisis," one that he can again attribute to me, in order to cause this case to be reassigned and to again attribute to me misconduct that he himself committed.

15. In light of this, I request that the Federal Bureau of Investigation confiscate Trevor Clark's home and office computers, and the computers of his co-workers, Stephen Gray and Paul Shoemaker who often work in concert with him. I believe that Trevor Clark is the source of Judge Pearson's address being posted, given his history of violations of the law regarding the private information of others-- from prisoners' visitors to Ohio lawmakers.

16. I sign this declaration pursuant to 28 U.S.C. 1746.

DECLARANT FURTHER SAYETH NAUGHT.

  
Sean Swain, Declarant  
SOCF  
Lucasville, OH 45699

DATE: 01JUNE15