

KAREH INFANTE ALLEN
CLERK OF COURTS
TRUMBULL COUNTY

2017 APR 25 PM 12: 17

TRUMBULL COUNTY
CLERK OF COURTS

**COURT OF COMMON PLEAS
TRUMBULL COUNTY, OHIO**

STATE OF OHIO)
)
COUNTY OF TRUMBULL) SS.

AFFIDAVIT IN SUPPORT OF PROSECUTOR'S COMPLAINT TRUMBULL COUNTY
CASE NO. 17-CR-260 AND
ARREST WARRANT

Now comes DET. RAY BUHALA OF THE LIBERTY TOWNSHIP POLICE DEPARTMENT, hereinafter referred to as Affiant, who first being duly sworn according to law deposes and says:

1. Now comes DETECTIVE RAY BUHALA of the LIBERTY Township Police Department, hereinafter referred to as the Affiant, who first being duly sworn according to law deposes and says:
2. Affiant has been a police officer since 2003. Affiant has been employed by the Liberty Township Police Department since 2006. The Affiant has been a Detective in the Liberty Township Investigation Division since 2014. Affiant has undergone extensive training in law enforcement, to wit: Ohio Peace Officer Training Academy, Master Investigator Certificate through State of Ohio. Your Affiant has been involved in several homicide, burglary, theft, prostitution and other major cases which have led to the arrest and convictions of numerous individuals.
3. April 24th 2017 Liberty officers were dispatched to the area of East Drive for shots being

heard/disturbance. Upon arrival, Liberty Police patrol units located a 2017 Cadillac SUV OH REGISTRATION HCF5290 in a grass alley between March and East Drive that was burning. Officers located a gas can at the rear drivers' side tire. No occupants were found in the vehicle. Officers ran the registration through Trumbull County Dispatch and determined that the registered owner, Jane Larue Brown, resides at 503 Churchill Hubbard Road, Liberty Township, Trumbull County, Ohio. The location where the vehicle was located is approximately 200 yards from 503 Churchill-Hubbard Road and directly behind 420 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio.

4. Officers responded to the residence at 503 Churchill-Hubbard Road, (State Route 304) Liberty Township, Trumbull County, Ohio and located the rear sliding glass door smashed and a sledge hammer nearby. Officers also observed that the front door to the residence was unlocked. After knocking and announcing, Liberty Police Patrol officers entered and observed a ransacked house. In a back bedroom, officers located the deceased body of a Jane Larue Brown lying supine on a bed. She was bloodied and appeared to have stab wounds about her head and neck. Officers secured the scene, established a perimeter, and contacted Detective Bureau. Also in the home there was a TV stand that was missing the television. There was dust indicating that the TV had recently been removed from the location.
5. Liberty Police Officers then began to canvass the neighborhood in hopes of finding any witnesses who may have seen or heard anything relating to the crime. Officer Pete DeAngelo went to 420 Churchill-Hubbard Road (State Route 304), Liberty Township,

Trumbull County, Ohio. That residence is located across the street from 503 Churchill-Hubbard. In fact Shady Road, which runs on the west of 503 Churchill-Hubbard Road, dead ends into the driveway of 420 Churchill-Hubbard Road.

6. Officer DeAngelo, was advised by a fellow officer that one of the residents at 420 mowed the grass for Jane Larue Brown and advised Officer DeAngelo to check and see if they knew anything. Officer DeAngelo, who had previously been to 420 Churchill-Hubbard Road (State Route 304) Liberty Township, Trumbull County, Ohio prior to April 24, 2017, knew from past experience that you have to go into a breezeway located between the garage and home to ring a doorbell. When Officer DeAngelo went into breezeway to ring the doorbell he noticed the back breezeway door was open. Officer DeAngelo while standing on the stoop in the breezeway noticed blood on the open back door of the breezeway.
7. Affiant then obtained two (2) search warrants from Trumbull County Common Pleas Court Judge W. Wyatt McKay for 420 and 503 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio which were executed in the morning of April 24, 2017 at approximately 10:36 a.m.
8. Located in 420 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio were numerous items that were stolen from 503 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio. Including the flat screen television that appeared to have blood that was stolen from 503 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio. Additionally, a number of other items had what appeared to be blood on them. Stolen items were found in both the

garage and inside of the home at 420.

9. A ripped ten dollar bill (\$10.00) was found in the home of 420. The matching portion of that ten dollar bill (\$10.00) was located in 503 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio.
10. Eventually Affiant and Det. Sgt. Mike Yannucci of the Trumbull County Sheriff's Office interviewed Sean Michael Clemens and a co-worker of Sean's.
11. The following is based upon those audio and video interviews.
12. According to the co-worker of Sean Michael Clemens, Clemens drove his truck and picked up the co-worker at approximately 7:30. He and Clemens went to a methadone clinic where Sean received "treatment". The co-worker stayed in Clemens truck. They then went to a job site in Poland, Ohio. During the drive to the methadone clinic the co-worker stated that Clemens said that he got into a lot of trouble last night and he beat someone up and he thinks their dead. Clemens also made a statement that he was going to spend the rest of his life in prison.
13. When Clemens and the co-worker arrived at the job site in Poland, Ohio, the co-worker stated Clemens began making spontaneous statements about what he had done. Those statements included beating the victim and cutting "her" throat. That was the first time that the co-worker thought that Clemens was not referring to just a fight with a unknown male. According to the co-worker Clemens made comments that he was going to spend the rest of his life in jail.
14. At some point the co-worker stated that Clemens received a phone call and it was told to Clemens that his house in Liberty had tape around. The co-worker stated that he and

Clemens left in Clemens truck and Clemens drove back to his house in Liberty.

15. As Clemens drove east on Churchill-Hubbard Drive and approached 420 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio, both men could see that there were police officers and crime scene tape around both 420 and 503 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio. Clemens then turned north on East Drive.
16. Affiant and Det. Sgt. Yannucci were told by the co-worker that Clemens made statements during this time that he should have put the car in Marinelli's property and not left it so close to his house.
17. The co-worker also stated that Clemens asked him to pinkie swear/promise not to divulge any of the information he had told him.
18. While travelling up East Drive Clemens turned east on to Ventura and then south on March. According to the co-worker Clemens told him to throw out at Samsung mini tablet. The co-worker refused to do so and Clemens then threw it out the window. The tablet was later recovered by Liberty Police after the co-worker took Liberty Police Officers to the location.
19. The co-worker stated that Clemens pulled up and parked in a neighbor's driveway and officers recognized the vehicle as belonging to Sean Clemens. Clemens was then observed to have injuries to his head, singed head and arm hair and was detained for questioning.
20. Affiant and Det. Sgt. Yannucci then conducted an audio and video recorded interview at Liberty Police Department after Clemens was Mirandized both verbally and in writing.

21. Clemens then stated to Affiant and Det. Sgt. Yannucci the following: He used a sledge hammer to break in the sliding door of 503 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio. He took a hand shovel from the garden and went into house and beat 84 year old Jane Larue Brown who was sleeping in her bed. The sledge hammer was located outside of the residence. Inside the house and under the body of Jane Larue Brown was the hand shovel. Clemens also stated he obtained a knife from inside 503 and used it to slice the throat of Jane Larue Brown. Further, according to Trumbull County Coroner and Forensic Pathologist Dr. Humphrey Germaniuk the autopsy shows injuries and bruises to Jane Larue Brown's arms consistent with defensive wounds prior to her death.
22. Clemens then ransacked the home selecting various items from throughout the house. Clemens loaded the victims 2017 Cadillac SUV which was parked in her garage with items he wanted. Included was the flat screen TV and the computer tower and bags of items. All of these were recovered from 420 Churchill-Hubbard Road (State Route 304), Liberty Township, Trumbull County, Ohio.
23. Clemens stated he then drove the 2017 Cadillac SUV from 503 to the back of his residence near the back breezeway door that had the blood on it. He then put the TV in the garage and the remaining items in a spare room.
24. He then stated he drove the car with his two dogs in it to the location where it was found. Clemens took a gas can from his garage and then poured gasoline in the interior of the vehicle and lit it on fire. Clemens admitted that he got singed by the fire he started in the stolen SUV. Additionally, one of his dogs was also singed by the fire that was set in the

victim's car. Both of the Defendant's dogs were the subject of a search warrant issued by Trumbull County Common Pleas Court Judge Peter J. Kontos.

25. Clemens advised he returned on foot to his home with his dogs and went to work.

THEREFORE for the above given reasons, Affiant firmly believes he has shown that probable cause has been established to charge the following person: SEAN MICHAEL CLEMENS, DOB 3/11/84, [REDACTED] with the crimes of AGGRAVATED MURDER in violation of section 2903.01 (B) & (F) of the Ohio Revised Code and AGGRAVATED BURGLARY in violation of section 2911.11(A)(1)&(B), a felony of the first degree and AGGRAVATED ROBBERY in violation of section 2911.01(A)(3)&(C), a felony of the first degree, and after due consideration, Affiant further prays that this Honorable Court issue upon the Prosecutor's Complaint a warrant for the arrest of said SEAN MICHAEL CLEMENS, DOB 3/11/84, SS# [REDACTED]

FURTHER AFFIANTS SAYETH NAUGHT.

DET. SGT. R. B. UHALA
DETECTIVE RAY BUHALA
LIBERTY TOWNSHIP POLICE DEPARTMENT
AFFIANT

Sworn to and subscribed before me, a Common Pleas Judge, in and for Trumbull County, Ohio, this April 25, 2017

W. Wyatt McKay
JUDGE, W. WYATT MCKAY
COURT OF COMMON PLEAS

**IN THE COURT OF COMMON PLEAS
TRUMBULL COUNTY, OHIO**

STATE OF OHIO,

vs.

SEAN MICHAEL CLEMENS,
420 CHURCHILL HUBBARD RD
YOUNGSTOWN, OHIO 44505
A MALE BEING
APPROXIMATELY
6'02" TALL AND WEIGHING
APPROXIMATELY 220 POUNDS
BROWN HAIR BLUE EYES
DOB 3/11/84, SS# [REDACTED]
CURRENTLY IN THE TRUMBULL
COUNTY JAIL, 150 HIGH STREET,
NW, WARREN, OHIO

* **COMPLAINT BY PROSECUTING
ATTORNEY UPON AFFIDAVIT
(CRIMINAL RULE 4)**

* **CASE NO. 17-CR-260**

* **(RULE 4)**

* **HONORABLE JUDGE:
W. WYATT MCKAY**

KAREN KEANE ALLEN
CLERK OF COURTS
TRUMBULL COUNTY
2017 APR 25 PM 12:15
TRUMBULL COUNTY
CLERK OF COURTS

**COUNT ONE
AGGRAVATED MURDER**

Complainant Assistant Prosecuting Attorney being duly sworn states that DETECTIVE RAY BUHALA OF THE LIBERTY TOWNSHIP POLICE DEPARTMENT has filed an affidavit, a copy of which is attached hereto, stating that SEAN MICHAEL CLEMENS at LIBERTY TOWNSHIP, Trumbull County, Ohio on or about APRIL 24, 2017, did purposely cause the death of another, to-wit JUNE LARUE BROWN, while committing or attempting to commit, or while fleeing immediately after committing or attempting to commit, aggravated robbery or aggravated burglary

Upon this affidavit complainant states that SEAN MICHAEL CLEMENS on or about the date and the above place did violate Section 2903.01(B) & (F) of the Ohio Revised Code.

**COUNT TWO
AGGRAVATED ROBBERY**

Complainant Assistant Prosecuting Attorney being duly sworn states that DETECTIVE RAY BUHALA OF THE LIBERTY TOWNSHIP POLICE DEPARTMENT has filed an affidavit, a copy of which is attached hereto, stating that SEAN MICHAEL CLEMENS at LIBERTY TOWNSHIP, Trumbull County, Ohio on or about APRIL, 24, 2017, did in attempting or committing a theft offense, as defined in section 2913.01 of the Revised Code, or in fleeing

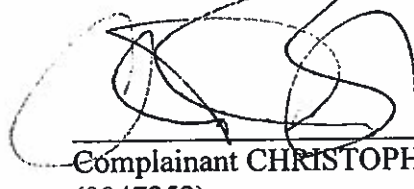
immediately after the attempt or offense did inflict, or attempt to inflict, serious physical harm to Jane Larue Brown,

Upon this affidavit complainant states that SEAN MICHAEL CLEMENS on or about the date and the above place did violate Section 2911.01(A)(3) & (C) of the Ohio Revised Code.

COUNT THREE
ATTEMPTED BURGLARY

Complainant Assistant Prosecuting Attorney being duly sworn states that DETECTIVE RAY BUHALA OF THE LIBERTY TOWNSHIP POLICE DEPARTMENT has filed an affidavit, a copy of which is attached hereto, stating that SEAN MICHAEL CLEMENS at LIBERTY TOWNSHIP, Trumbull County, Ohio on or about APRIL, 24, 2017, did by force, stealth, or deception, did trespass in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, when another person other than an accomplice or the offender is present, with purpose to commit in the structure or in the separately secured or separately occupied portion of the structure any criminal offense, when the offender inflicted or attempted or threatened to inflict, physical harm on another to-wit: Jane Larue Brown.

Upon this affidavit complainant states that SEAN MICHAEL CLEMENS on or about the date and the above place did violate Section 2911.11(A)(1) & (B) of the Ohio Revised Code.



Complainant CHRISTOPHER D. BECKER
(0047252)
Assistant Prosecuting Attorney
Trumbull County, Ohio

Sworn to and subscribed before me by HONORABLE JUDGE W. WYATT McKAY on APRIL 25, 2017.



W. WYATT McKAY
Trumbull County, State of Ohio