



# Ronald Giles

*Attorney At Law*

January 27, 1998

Carl Hubbard #205988  
Saginaw Correctional Facility 12-170  
9625 Pierce Road  
Freeland, MI 48623

Dear Mr. Hubbard:

I received your letter dated January 21, 1998. Currently you have all the information that I have in regards to your file, which I have sent to you previously. I have no additional written documents or information.

In regards to the perjury charge against Mr. Curtis Collins, alias Tony Smith, it is my recollection that on the first day of his testimony, when he changed his testimony to be different from that given during the preliminary examination, once he left the courtroom he was arrested in regards to perjury. He was held in the police station overnight. He agreed to change his testimony back to the original version and he was never officially charged with perjury. As a result, there is no written documentation in regards to this matter as to Mr. Collins (Smith).

It is also my recollection that Mr. Collins was on probation or parole, and was given a "deal" in order to maintain his probation or parole, after his testimony. Again, if there is anything documented on this subject, it would be in the papers I sent you. But if I remember correctly, that was brought out during the trial and should be in the transcript.

Other than the foregoing information, I have nothing else that I can add. I don't see how I can assist you any further as I have given you everything that I have in relation to your file.

Very truly yours,

A handwritten signature in black ink that appears to read "Ronald Giles".

Ronald Giles

RG:dg .

STATE OF MICHIGAN)  
 )  
COUNTY OF WAYNE )


**AFFIDAVIT OF FACTS**

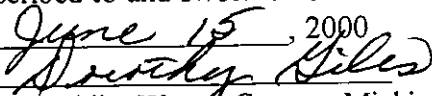
**I, RONALD GILES**, being first duly sworn, deposes and says:

1. I represented Mr. Carl Hubbard in his Bench Trial in Recorder's Court for the City of Detroit, wherein he was charged with First-Degree Murder.
2. In my representation of Mr. Hubbard there came a time during the testimony when the Prosecution called one Curtis Collins to the witness stand.
3. That on cross-examination of Mr. Collins, he drastically changed his testimony and according to my recollection, testified contrary to his testimony at the preliminary examination.
4. That Mr. Collins was arrested and detained following his trial testimony.
5. To the best of my information and belief, Mr. Collins was released and not charged when he changed his testimony the following day.
6. That Mr. Collins' testimony was especially critical to the Judge's verdict of guilt against Mr. Hubbard.

I declare under penalty of perjury that the statements made herein by me are true and accurate to the best of my knowledge, information and belief.

**Affiant further sayeth not.**

  
Ronald Giles (P38107)

Subscribed to and sworn before me  
on June 15, 2000  
  
Notary Public, Wayne County, Michigan

DOROTHY J. GILES  
NOTARY PUBLIC WAYNE CO., MI  
MY COMMISSION EXPIRES May 27, 2003