



**Confidential Defense Map for
Katherine DeGroot (Katie)**
from DefenseMap.com

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Total time: 16:28

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Adult case

a. Case Description: Post-conviction (post-conviction, appeals, habeas, and actual innocence cases).

b. Conviction(s) in this case: Dealing crack and meth.

Client's position on the conviction(s): I admit I am guilty of the crime(s) I was convicted of. (Client's full explanation is at Section 3.b below.)

c. Current representation?: No.

d. Funds to hire an attorney?: No.

e. Sentence: 30 years.

f. Time served so far: About 15 months.

g. Projected/expected release date on this case: June 25, 2043.

h. Completed appeal in this case?: No. I pled guilty, so I was told I had no appeal to take.

i. Other proceedings challenging the conviction or sentence?: No.

j. Important dates:

i. Arrest: March 7, 2020.

ii. Trial: None.

iii. Plea of guilty: August 15, 2020.

iv. Sentencing: September 28, 2020.

v. Direct appeal decision: None.

vi. Any later filings and decisions: None.

k. Other recent contacts with court, prosecutor, or other officials about this case?: No.

l. Case Type: State case.

m. Court/Locale: Orleans Parish Superior Court; Orleans Parish, Louisiana, USA.

Flags

Important notes to client on use of this Defense Map and these 9 Flags.

- ✓ The following 9 Flags may help you and your attorney in deciding on the best steps to take. But, the entire report is important, so read it all carefully. Take notes for your next discussion with your attorney.
- ✓ You can log back on as often as you want to add more information.
- ✓ Clients can often help their cases by considering any personal changes they'd like to make in their lives. Even one positive change can help many cases.

1. **Client's sense of personal safety** ([Section 2, p. 6](#)): The client reports feeling "Mostly unsafe."
2. **Emergency needs** ([Section 2, p. 6](#)): The client reports some emergency needs.
3. **Case descriptors from client**
 1. **Guilt or innocence in fact** ([Section 3, p. 6](#)): Completely guilty.
 2. **Current representation** (Face sheet c): No attorney currently.
 3. **Funds for counsel** (Face sheet d): Has no funds for counsel.
 4. **Projected/expected release date** (Face sheet j): June 25, 2043.
 5. **Time served already** (Face sheet h): About 15 months.
 6. **Plea of guilty?** ([Section 3, p. 6](#)): Pled guilty.
 7. **Trial?** ([Section 3, p. 6](#)): Had a trial. .
 8. **Client testified?** ([Section 3, p. 6](#)): Yes.
4. **Asserts important evidence was not tested or not followed up on** ([Section 3, p. 6](#)).
5. **An illegal sentence or illegal sentencing procedure** ([Section 3, p. 6](#)).
6. **Past/other cases:**
 - **Past arrests and charges** ([Section 4, p. 7](#)): Prior record disclosed.
7. **Outlook and functioning:**
 1. **PTSD/Repeating bad memories or nightmares** ([Section 12, p. 9](#)): Potential PTSD issue disclosed.
 2. **Childhood years** ([Section 13, p. 10](#)): 7 childhood assets reported as either partly or completely missing, and 30 childhood challenges disclosed. The client's responses show an Adverse Childhood Experience (ACE) score of 3 out of 10.
 3. **One or more controlling or hurtful partners** ([Section 14, p. 12](#)): Potential issue.
 4. **Adult years** ([Section 15, p. 14](#)): 10 of 14 important life assets either missing or partially missing.
 5. **Addictive patterns** 2 possible issue(s) disclosed.
 - a. **Use of drugs (other than alcohol)** ([Section 17, p. 15](#)): 18 significant responses, a serious indication (2 out of 2) of a possible drug issue.
 - b. **Other abuse/addiction issues** ([Section 18, p. 16](#)): Other abuse/addiction issues described.
 6. **Mood and functioning issues** ([Section 19, p. 16](#)): 7 possible issues disclosed.
 - a. **Thoughts of hurting myself:** 9 significant responses.
 - b. **Depression:** 13 significant responses.
 - c. **Dependence/Codependence:** 13 significant responses.
 - d. **Being more worried and nervous than other people.**
 - e. **Trouble with attention or staying focused.**
 - f. **Problems with thoughts that seem to race or that I can't control.**
 - g. **Finding it hard to have close relationships.**
8. **The client reports a wish to make changes in these 5 areas of life** ([Section 22, p. 19](#)):
 1. **Education** (details on p. 19).
 2. **Alcohol or drug use** (details on p. 19).
 3. **Counseling** (details on p. 19).

Summary of Sections

Part A: Legal

1. What's most on client's mind ([p. 6](#)).
2. Client's safety/Emergency needs ([p. 6](#)).
3. Case details ([p. 6](#)).
4. Other criminal cases/arrests ([p. 7](#)).
5. Other important legal cases ([p. 8](#)).

Part B: Basic Profile

6. Military service ([p. 8](#)).
7. Physical health ([p. 8](#)).
8. Family and other important relationships ([p. 8](#)).
9. Education ([p. 8](#)).
10. Employment ([p. 8](#)).
11. Use of free time ([p. 9](#)).

Part C: Personal Challenges

12. PTSD/Repeating bad memories or nightmares ([p. 9](#)).
13. Childhood years ([p. 10](#)).
14. One or more controlling or hurtful partners ([p. 12](#)).
15. Adult years ([p. 14](#)).

Part D: Addictive Patterns

16. Use of alcohol ([p. 15](#)).
17. Use of drugs (other than alcohol) ([p. 15](#)).
18. Other abuse or addiction issues ([p. 16](#)).

Part E: Personal Functioning

19. Mood and functioning issues ([p. 16](#)).
20. Counseling history ([p. 17](#)).

Part F: Life Patterns and Character and Mitigation Evidence

21. Client today ([p. 17](#)).
22. Client's thoughts on the future ([p. 19](#)).
23. Character and mitigation evidence ([p. 19](#)).

Sections

Part A: Legal

1. What's most on client's mind ([Up to Flags Page](#))

This is an awfully long time, and I don't think I deserved this much. I'm losing contact with any of the healthy people in my life.

2. Client's safety/Emergency needs ([Up to Flags Page](#))

- a. **Client's sense of personal safety:** Mostly unsafe. As some of the older and more peaceful and mature inmates put it, there is a new generation of inmates going to prison these days, including women's prisons. Some come from violent gangs, and many join gangs (some out of necessity once here. I haven't, and this can be a terrifying place without those kinds of protection.
- b. **Emergency needs?:** Yes. I don't like to talk about it or tell anyone (because people get preyed on if they look weak), but I have more and more thoughts of taking my life.

3. Case details ([Up to Flags Page](#))

- a. **The charge(s):** I was in a foolish relationship with a couple. It started out as sexual (a thruple) but he turned us both into drug dealers. I was in way over my head. When he got busted, he made me out as a major player to lower his sentence.
- b. **Client's position on the conviction(s), underlying causes, and any co-defendants:** I admit I am guilty of the crime(s) I was convicted of.

Technically, yes, I dealt all these drugs. Worst of all, I told my family lies about needing money for medical experiences and such, my being diagnosed with Crones Disease (which I never had) to finance the drug deals. It was over about a year's time. The worst mistake of my life.

My whole involvement grew out of my life falling apart after my molestation, my not reaching out to talk about it, my getting involved as a "third wheel" with a married couple (Joe and Ruth Conboy) who I saw as strong, able to protect me, and willing to trade sex for that protection. This led to their getting me involved in the dealing and becoming abusive and threatening.

When they got arrested, they had the money to hire a firm that immediately got them cooperating against me. As a result, they got sentences only a quarter as long as my sentence--but in truth they were the leaders in this.

- c. **Co-defendants?:** Yes. Joe and Ruth Conboy were my codefendants. They got sentences about a quarter of mine (7 years and 6 years), even though they had the drug business, got me into it, and supervised everything I did.

I met them a few times in town and at an entertainment bar we went to (Tapps). All I knew about them was they were friendly and seemed to be well off and very confident. About 2 years (May 2020) ago Ruth was there alone and asked if she could talk with me. She told me she and Joe had an open relationship and Joe was interested in me. I was surprised and flattered. As I was later able to figure out looking back on things, I was also attracted to the feeling of confidence and "protectiveness" they had. Here were strong successful people who might care about me.

On the next couple of times I saw them at Tapps, Joe was flirtatious and complimented me a lot. I learned they owned and managed some properties. Eventually we started a relationship that they called "a thruple." We smoked some grass but that was all as far as anything illegal.

A few months in they told me they sometimes dealt drugs. By this time I was very attracted to our life together, and I went along. Only later did they involve me in it.

It was about 6 months into our relationship that Joe became abusive toward me (and once that I saw with Ruth). This eventually led to pushing, slapping, pulling my hair, and threatening and controlling any money, who I could see, and what I could talk about with anyone.

Everything I did about drugs was at their direction. I got no money except the little they gave me from time to time.

I'm especially ashamed of the story I told my family about being sick with Crone's Disease to get money from them. I'd never heard of this disease (Joe had a cousin with it), and everything I said came from them. (Not that that's an excuse for what I did to my family.)

When we got arrested, I had a busy PD, and they had 2 excellent private attorneys who made deals to testify against others (including their suppliers and me).

- d. **Interaction/statements with law enforcement:** I never resisted or gave anyone any problems. But by the time I was arrested, everyone I'd dealt with had made deals with the prosecution, and I got all this time.
- e. **Client discussions with others about the events?:** Yes. Family, friends, a counselor here, some trustworthy inmates (or ones I think, are trustworthy).
- f. **Pled guilty?:** Yes. Plea to the charge, no limit on what the State or defense could argue for.

[Note: f. through l. are questions about events at trial and, therefore, are irrelevant and omitted here.]:

Error claimed in the plea deal?: Yes. I think little was done to look at why I did this. I was in jail pending the plea and sentencing and didn't have help to pull together the reasons for my involvement. I've also been told by one of the inmate law clerks that my plea agreement was defective for not listing all the rights I was giving up. It turns out she is right (it doesn't mention losing the right to confront and cross-examine witnesses or the right to call witnesses in my favor). I'm not sure what difference this makes, as I am guessing I was asked about these at my plea hearing, though I'm not sure.

- n. **Know of any important evidence not tested/followed up on?:** Yes. I don't think my attorney did enough to follow up on my life and how I got involved in this. And how my co-defendants were actually much more responsible for this.
- o. **An illegal sentence or illegal sentencing procedure?:** Yes. I don't think enough was done to understand how my life got to this point. I was sexually abused for about 20 months starting at age 14. Everything in my life fell apart. I didn't talk about this with anyone, including my attorney, but he never asked or seemed a safe person to speak with. About 6 months ago, this abuser was charged with child molesting, so I felt I could start talking about this. It was a youth pastor. But with the help of some classes and recovery here (so many of the women here were abused), I've been able to open up and see how all my problems with dropping out, trying to find someone to cling to even if they were dangerous to me, and more came from this.
- p. **Additional errors?:** No.
- q. **Documents with client:** I have the charge, the plea, the PSR, and the Judgment and Sentence Order.

4. Other criminal cases/arrests ([Up to Flags Page](#))

- a. **Juvenile cases:** 3. All these were alcohol violations ("Minor in Possession of Alcohol"). I turned to this a lot after my molestation. In all the cases I was represented by PD Mark Jameson. In the first two I was 15 years old and got non-reporting probation. In the last I was 17 and got 2 weekends in detention. As I look back on these, I know I was mostly using alcohol as a way not to think about what happened in my molestation.

- b. **Other adult cases:** 1.

Details: Aggravated battery (with a weapon, which was a beer bottle). This was in Orleans Parish also. I was just 21, in a bar, drunk, and lost it a man made a physical advance on me. He grabbed my buttocks and (when I pushed him away) my breasts. I hit him with a beer bottle and then kept hitting him when he was on the floor. I felt I sort of "snapped." I didn't (and still don't) recall deciding to do this, but I did it. The man lost an eye and had some problems with head trauma. I don't know how he is today.

I was allowed to plead to plain battery and got a sentence of 1 year with 90 days in jail. My attorney was PD Kenneth Loudon.

As I look back on the case, I feel this man's behavior triggered my memories and feelings about the molestation, which is why I think so many of the details are blurry in my memory.

- c. **Any other arrests?:** No.
- d. **Other live cases?:** No.
- e. **Most shocking/difficult aspects of any (and all) arrests and detentions:** Prison often is shocking. People think women can't be mean or danger, but a women's prison in 2022 proves otherwise. I've

seen several beatings, two rapes (one using a shampoo bottle and one using a mop handle), and more.

5. **Other important legal cases** ([Up to Flags Page](#))

- a. Any other legal cases now?: No.
- b. Past legal cases?: No.

Part B: Basic Profile

6. **Military service** ([Up to Flags Page](#))

None.

7. **Physical health** ([Up to Flags Page](#))

- a. Overall health: Good (2 out of 2).
- b. History of head injury?: No.
- c. History of losing consciousness?: No.
- d. Diagnosed with brain injury or disease?: No.
- e. Other serious physical problems or disabilities?: No.
- f. Major surgeries?: No.
- g. Currently on medications?: No.
- h. Medical condition making incarceration dangerous?: Maybe. My depression, and wanting sometimes to be dead.
- i. Other important medical information?: No.

8. **Family and other important relationships** ([Up to Flags Page](#))

- a. Currently married?: No.
Currently in a committed or long-term relationship?: No.
- b. Married before?: No.
- c. Children: 0.
- d. Most positive and supportive people in client's life: My parents and brother.
- e. Current unhealthy or hurtful relationships?: Maybe. In prison, you both have to make fiends and avoid having friends. I think the people I've chosen to open up to are good choices, but they all have their problems and limitations.
- f. Other impactful people in client's life currently?: No.

9. **Education** ([Up to Flags Page](#))

- a. Currently in school?: Yes.
- b. Extent/description of education: test1.
- c. Success in school: Very little (0 out of 2). test.

10. **Employment** ([Up to Flags Page](#))

- a. Employed?: Yes. I work as a GED tutor in Math and English.
- b. Prior work experience: Some housekeeping, brief factory work until too many of the men creeped me out, and my tutoring here.
- c. Any other important information about employment or work history?: No.

11. Use of free time ([Up to Flags Page](#))

- a. **Currently:** Reading, writing my family, looking out for myself, trying to be of help to some good people here, TV, writing some poetry.
- b. **Consequences from ways client has used free time:** I think I use my time well. My family and counselor say so. Getting depressed and stuck may be a time issue/problem, but I don't choose to be that way, and I try to press through.

Part C: Personal Challenges

12. PTSD/Repeating bad memories or nightmares ([Up to Flags Page](#))

- a. **Bothered by bad memories/nightmares of traumatic events?:** Yes.
- b. **Number of traumatic events still causing symptoms:** Over 10.
- c. **Events:** I can't focus on this too much without getting depressed and stressed. So, I hope a general description is okay for now.

The sexual molestation came first. I was lured into doing some manual stimulation on the youth pastor and then oral sex. We never had intercourse, but I was quite young and found all this disgusting and was unable to say anything about it.

There was a fair amount of trauma in my original jail sentence for the battery, as I saw some shocking things I was never exposed to.

There were some upsetting things in my "thruple" relationship that led to my arrest, things I still have nightmares about and wake up in terror about. I think I was drawn to this relationship because it seemed like one that would protect me. But it turned out both of them could be humiliating to me--and physically violent on 2 occasions.

The arrest time in prison on this charge has been filled with seeing beatings and rapes and threats of violence. I haven't so far been the subject of too much of this, but it always feels like anything could happen.

d. Symptoms in the last 12 months:

- 1. Unwanted memories of the events.
 - 2. Flashbacks/reliving the events as if happening again.
 - 3. Nightmares about the events.
 - 4. Waking up thinking about the events.
 - 5. Trying not to think or talk about the events.
 - 6. Trying not to be around people, places, or things that remind me of the events.
 - 7. Isolating/often not wanting to be around other people.
 - 8. Feeling depressed/losing the ability to feel joy.
 - 9. Lack of interest in things that I used to enjoy.
 - 10. Feeling hopeless about the future.
 - 11. Problems with angry outbursts or aggressive behavior. I think my battery conviction grew out of this.
 - 12. Difficulty keeping close relationships.
 - 13. Almost always being on guard for danger.
 - 14. Being easily startled or frightened.
 - 15. A lot of guilt or shame.
 - 16. Trouble concentrating.
 - 17. Trouble sleeping.
- e. **Any connection between these experiences/PTSD and legal problems (including this case)?:** Yes. I think everything that's gone wrong in my life goes back to these terrible memories.
 - f. **Other PTSD information?:** Yes. But I would rather not have to say more about this right now.

13. Childhood years ([Up to Flags Page](#))

- a. **Client most wants understood about childhood:** I had 2 childhoods--one before the molestation and one after.

Childhood assets. Regarding 17 possible important childhood assets, the client reported the following:

- **Present in client's childhood:**
 1. **A loving mother who stayed in my life.**
 2. **A loving father who stayed in my life.**
 3. **Other loving family members.**
 4. **Parents who stayed happily together.**
 5. **Peace within my family as a whole.**
 6. **A family that was able to have disagreements but then peacefully settle them.**
 7. **A lot of admiration from my family and others important to me.**
 8. **Consistency in the admiration and encouragement I received.**
 9. **Adults who responded to my mistakes and misbehavior with positive correction instead of punishment.**
 10. **A lot of encouragement to do well in school.**
 - **Somewhat present in client's childhood:**
 1. **All my basic needs.** I had all these things until I ran away--and then I often went without them.
 2. **A consistently safe home life.** It was safe except that no one knew what was happening to me with the pastor.
 3. **A family that took my concerns and wishes seriously.** I'm just not sure about this. I certainly didn't feel safe to say anything about the pastor's sex with me.
 4. **An overall good experience with school.** It was fine until it wasn't. It (like everything else) fell apart with the molestation.
 5. **Good friends almost all the time.** Again, my good relationships gave way when my good childhood gave way.
 - **Missing in client's childhood:**
 1. **A family where I could talk about things that hurt or scared me.** I was too ashamed to tell my family about how I was being used sexually. I still don't know how my family would have reacted, but today I obviously wish I'd said something.
 2. **The feeling that I would have a good future.** I guess I had this at one time, but it went completely away with the molesting, feeling I wasn't protected, and the memories of this.
- c. **Childhood challenges:**
- i. **Family structure during my childhood:**
 1. **Unsafe or unhealthy people brought into our home or family life.** My molester. My parents knew him, but certainly didn't know what he was doing.
 - ii. **Childhood sexual abuse:**
 1. **Sexual abuse.**
 2. **Sex or sexual touching I didn't want.**
 3. **Sex or sexual touching with someone a lot older than I was.**
 4. **Something sexual I was too young to really agree to.**
 5. **Sex or sexual touching I now wish hadn't happened.**
 6. **Tricked into sex or sexual touching.**
 7. **Being watched, photographed, or videoed while naked or having sex.**
 - iii. **Childhood attack or physical abuse (other than sexual):**
 1. **Hit or physically attacked.** After being molested, I got into some dangerous relationships and activities, and some of this happened.
 2. **A crime against me.** The sex, obviously. But as my life fell apart, I also got into some situations where I was hit, had things stolen from me, etc.
 3. **Threatened by a gang or gang member.**
 - iv. **Childhood emotional or verbal mistreatment or abuse:**

1. A lot of hurtful criticism/put-downs from someone other than a parent. In the dangerous relationships I defaulted to, this would happen.
 2. Bullied.
 3. Mistreatment based on gender/sex.
 4. Mistreatment based on something else. When my life fell apart, the people who would accept me would then sometimes turn on me and say the worst things.
- v. **Family members' functioning during my childhood:**
1. Another problem with a family member. The only thing I can say is that my parents were almost so perfect I felt I couldn't go to them about what was happening to me. My dad especially didn't believe in opening up or getting help. He was highly religious, and I just never felt like there would be room to understand what was happening to me.
- vi. **As a child, seeing something very upsetting or frightening:**
1. Seeing or hearing a serious accident or injury to someone. This was all part of what I saw as a young person who fell out of connection with her family.
 2. Seeing or hearing someone attacked. Ditto.
 3. Seeing or hearing someone beaten. Ditto.
 4. Seeing or hearing a violent fight. Ditto.
 5. Seeing or hearing someone threatened. Ditto.
- vii. **As a child, feeling responsible for something bad that happened:**
1. Feeling that an accident, death, or other sad or scary event was my fault. I think I felt this about all of the terrible things I saw and experienced as a child.
- viii. **Other childhood issues:**
1. Being violent toward others.
 2. Encouraged by someone to break the law or commit a crime.
 3. Committing crimes.
 4. Anger issues/many arguments or fights.
 5. Doing things with a gang or hanging out with a gang.
 6. Alcohol use.
 7. Drug use.
 8. Worries about my sexuality or others' acceptance of my sexuality.
- d. **Relationship with father (while growing up):** Good (2 out of 2). It was good except that we couldn't relate when things got bad in my life. I wish our family had been open to getting help and talk gin about hard things. But it wasn't the way we related.
- Relationship with father (today):** Good (2 out of 2). He's been wonderful. Both my parents have been, as has been the case with my brother.
- e. **Relationship with mother (while growing up):** Good (2 out of 2).
- Relationship with mother (today):** Good (2 out of 2).
- f. **Raised at any time by anyone other than mother or father?:** No.
- g. **Any other serious difficulties in childhood?:** No.
- h. **ACE (Adverse Childhood Experience) Score:** 3 out of 10. The client answered Yes to the following standardized questions.
1. **Did an adult or someone at least 5 years older than you ever either: Touch or fondle you or have you touch their body in a sexual way? OR have (or try to have) oral, anal, or vaginal sex with you?** As I said before, I was sexually abused by our pastor.
 2. **Did you often feel either: That no one in your family loved you or thought you were important or special? OR that your family didn't look out for each other, feel close to each other, or support each other?** I didn't feel I could tell my family about what was happening to me--or what had happened to me.
 3. **Did you ever live with anyone who was a problem drinker or alcoholic or someone who used drugs?** When I became unhinged from my family, yes, I ran away and lived with several people who had drug and drinking problems (and took sexual, physical, and financial advantage of me).

Note: The ACE Questionnaire is credited with establishing the strong link between traumas in childhood and chronic disease and life difficulties in adulthood. The higher the ACE score, the

greater incidence of a broad range of adult challenges. See [History and Significance of ACE Questionnaire](#).

- i. **Any connection between childhood problems and legal problems (including this case)?**: Yes. As I've said, the molesting and my inability to talk about it overtook everything good in my life.

14. One or more controlling or hurtful partners ([Up to Flags Page](#))

- a. **Any current involvement with a controlling or hurtful partner?**: Yes.

1. **Controlling/hurtful behavior in question began**: May 2020.
2. **Client's age when controlling/hurtful behavior began**: 22.
3. **Person**: My co-defendants, mostly the male, Joe Conboy.
4. **Relationship**: A lover, partner, co-conspirator. But his wife Ruth was involved as well.
5. **Controlling/hurtful behavior in question**:
 - A. **Physical mistreatment of me**:
 1. Pushed me.
 2. Slapped me.
 3. Pulled my hair.
 4. Hurt me with an object.
 - B. **Threatening**:
 1. Threatened to hurt me. He said he could have me arrested and could turn me in to some drug dealers who would kill me.
 2. Told me he/she would hit/hurt me. This was common. "I'll slap the shit out of you," etc.
 3. Left me believing he/she would seriously injure or kill me. The whole feel became one of intimidation.
 - C. **Trying to control my movements**:
 1. Controlled where I had to be in some other way. Told me things like I was a fellow drug dealer now and better listen if I "didn't want to be in a world of hurt."
 - D. **Trying to control money and finances**:
 1. Was financially unfair. I was always pressed to get more money from my family by faking illnesses.
 2. Demanded special credit for providing financially or buying something.
 - E. **Trying to control my choices and options**:
 1. Kept me from seeing people I wanted to see. Never wanted me to see my family except to get money from them.
 2. Limited how often (or how long) I could see other people.
 3. Questioned/interrogated me.
 - F. **Spying on me**:
 1. Checked on me/spied on me. Always tracked me.
 2. Checked my mail or other personal property.
 3. Checked my emails, texts, Facebook, or other communications.
 4. Asked people where I was, what I was doing, or who I was with.
 5. Had people follow me or report to him/her about me.
 6. Required me to carry a tracking device or have one on my car.
 - G. **Sexual control or humiliation**:
 1. Demanded sex at times I didn't want.
 2. Demanded kinds of sex I didn't want.
 3. Said I wanted too little, too much, or the wrong kind of sex.
 4. Falsely accused me of affairs or sex with others.
 5. Expected me to accept his/her having sex with someone else.
 6. Criticized me for engaging in sexual activities that he/she suggested.
 7. Criticized or punished me for my sexual past.
 - H. **Raging/losing temper**:
 1. Yelled or raged in front of me or others.
 2. Falsely accused me of things like disloyalty or lack of consideration.

3. Threatened to throw me out.
 4. Swore at me.
 5. Threw things in anger.
 6. Destroyed things in anger.
 7. Put holes in walls in anger.
 8. Been so out of control with anger that it scared me.
 9. Pointed a weapon at me or someone else.
 10. Fired a weapon while angry.
 11. Threatened me (or someone else) with a weapon.
- I. Other kinds of control:**
1. Tried to say what doctors or other professionals I should or should not see. I once shared with both of them that I felt I should see a counselor for my sexual victimization, and they both threw a fit. I wasn't ever to open up to anyone about anything--except to them.
- J. Getting you involved in criminal acts or things you thought were wrong.:**
1. Made me become involved in criminal acts.
 2. Convinced me to do things I thought were wrong.
 3. Got me involved in other things I thought were a bad idea.
 4. Attacked or criticized me if I didn't want to do something I thought was wrong.
 5. Got other people involved in criminal acts.
 6. Did something else to get people (me or someone else) involved in crimes or things that were wrong. They got at least 3 other people involved in their dealing, people I don't think would otherwise ever have gotten involved.
- K. Playing the victim:**
1. Complained about not getting enough credit for what he/she does.
 2. Complained that life—or life with me—has left him/her unhappy.
 3. Blamed me for his/her bad behavior, outbursts, or attacks.
- L. Keeping me from getting help:**
1. Kept me from getting counseling or other help.
 2. Threatened that I'd be sorry if I tried to get help or tell someone about what was going on.
 3. Told me not to tell others about our problems or our personal business.
- M. Promising to change, but without changing:**
1. Expressed deep sadness or regret over his/her behavior but didn't change.
 2. Used sex, good times, or other "honeymoon" behavior after being mean.
 3. Promised to change but wasn't honest about what happened.
- N. Some basic safety issues of this person:**
1. Has been dangerous to me.
 2. Has been dangerous to others.
 3. Has a criminal record.
 4. Has a criminal record involving violence or a threat of violence.
 5. Has had a gun. He had about 20 guns.
 6. Has made people afraid.
 7. Has had a drug problem.
 8. Has had an alcohol problem.
 9. Has become more violent or unpredictable when taking drugs.
 10. Has become more violent or unpredictable when drinking alcohol.
- O. Ever tried to leave?:** No.
- P. Police ever called?:** No.
- Q. Arrests or prosecutions?:** No.
- R. Attempts to get court protection?:** No.
- S. Your reactions and feelings:**
1. Sometimes left me feeling unsafe for myself.
 2. Sometimes left me feeling unsafe for others.
- T. Safety concerns expressed by others?:** At least a dozen other people.
- U. Evidence/proof of abuse:** Even the prosecution agrees about this, I think. Maybe we can

Speak about this.

- b. **Past controlling/hurtful relationships?:** No.
- c. **Total duration of all controlling/hurtful treatment:** About 4 years.
- d. **Client thoughts as a result of this controlling or hurtful treatment:**
 - 1. "I must have done something wrong to be treated this way."
 - 2. "I deserved the way I was treated."
 - 3. "I need to keep him/her happy at all cost."
 - 4. "I must not have remembered correctly what happened to me, what was said, or how it happened."
 - 5. "I'm afraid of leaving."
 - 6. "This is better than being alone."
 - 7. "It is what it is—and I can't change it."
 - 8. "It would be dangerous to ask to be treated better."
 - 9. "I'm afraid of people's anger."
- e. **Other consequences of this history of controlling/hurtful treatment:**
 - 1. I've changed how I've lived to please someone else.
 - 2. I've tried to keep someone else from being upset.
 - 3. I've put a lot of energy into trying to keep someone calm.
 - 4. I've sometimes stopped thinking about what I wanted and instead tried to please someone else.
 - 5. I've put up with things that weren't good for me.
 - 6. I've gotten talked into things I thought were a bad idea.
 - 7. I've gotten talked into things I thought were wrong.
 - 8. I've passed up on relationships and other opportunities that probably would have been good for me.
 - 9. I've seemed to have a pattern of getting into relationships that were hurtful or controlling.
 - 10. I've continued to do things for people who are unhealthy, angry, or controlling.
 - 11. I've concentrated so much on getting through each moment that I'm now poor at planning a better future.
 - 12. I've stopped seeing much of a future.
 - 13. I've lived in a way I wouldn't want other people to have to live.
- f. **Any connection between controlling/hurtful treatment and legal problems (including this case)?:**
Yes. These are all part of the same history.
- g. **Other information about hurtful/controlling treatment?:** No.
- h. **Survival strengths and help:** That's an interesting question, as I don't feel like I've survived much. Can we speak after I think about this?

15. **Adult years** ([Up to Flags Page](#))

- a. **Current life assets. Among 14 possible important life assets, the client reported the following:**
 - **Definitely present today:**
 - 1. Good physical health.
 - 2. A loving and helpful family life.
 - 3. Work I like.
 - 4. Volunteer work I like.
 - **Somewhat present today:**
 - 1. At least 3 good and helpful friends I can call on anytime.
 - 2. A lot of purpose in my life/a feeling that my life matters to others.
 - 3. A good balance between work, rest, and play.
 - 4. Good feelings and trust for police and other authorities.
 - 5. A spiritual life I'm happy with.

- **Missing today:**
 1. Safety in all parts of my life.
 2. Good peace of mind/freedom from worry most of the time.
 3. A lot of joy/happiness.
 4. Enough money/financial security.
 5. A safe place to live--without fear of losing it.
- b. **Client describes his/her problems in adult life:** This will also take some thought on my part. I hope we can speak about this later.

Part D: Addictive Patterns

16. Use of alcohol ([Up to Flags Page](#))

- a. **Significant responses regarding use of alcohol:** None.
- b. **Last used alcohol:** About 4 years ago.
- c. **Any connection between alcohol and legal problems (including this case)?:** No.
- d. **Client's belief about having a problem with alcohol:** No.

17. Use of drugs (other than alcohol) ([Up to Flags Page](#))

- a. **Significant drug responses:**
 1. I've used some illegal drugs.
 2. I've lied to get drugs.
 3. I've done something illegal to get drugs.
 4. I've had withdrawal symptoms or felt sick after using drugs.
 5. Drug use has caused a problem in some area of my life.
 6. I've sometimes felt bad or guilty about my drug use.
 7. A friend or family member has worried or complained to me about my use of drugs.
 8. I've used some prescription drugs illegally.
 9. I've used some prescription drugs other than as directed by a qualified doctor.
 10. I've used some prescription drugs to get high.
 11. I've gotten prescription drugs from a dealer or someone else not legally allowed to give them.
 12. I've used someone else's prescription drugs.
 13. I've used prescription drugs when I was not able to stop using them.
 14. I've used more than one drug at a time.
 15. I've been arrested for some other involvement with drugs other than just possession.
 16. I've used drugs while alone.
 17. I've used drugs and alcohol at the same time.
 18. I've had "blackouts" or "flashbacks" as a result of drug use.
- b. **Particular drugs used:**
 1. Narcotics other than heroin (0 times in the last 12 months).
 2. Marijuana/pot (0 times in the last 12 months).
 3. Methamphetamines (0 times in the last 12 months).
 4. Cocaine (powder) (0 times in the last 12 months).
- c. **Reflections on drug use:** This all grew out of wanting to not think about things, but then it turned into a way of life with the people I was living with and dealing with.
- d. **Client's belief about having a problem with drugs:** Yes. Well, obviously, I used too much, got addicted, let it get me into dangerous relationships, and led to this arrest. Clearly the early days of feeling an escape from bad memories have been gone for a long time.
- e. **Any connection between drugs and legal problems (including this case)?:** Yes. In my mind, it's a straight connection.

18. Other abuse or addiction issues ([Up to Flags Page](#))

- a. **Other addictive patterns or harmful habits?:** Yes. Possibly I've used bad or odd relationships to try to escape. Including the sexual relationship I had with my married codefendants.

Part E: Personal Functioning

19. Mood and functioning issues ([Up to Flags Page](#))

II. The client's responses don't include indications of the following in the last 12 months:

- a. **Thoughts of hurting others** (0 out of 8).
b. **More anger than most people seem to have** (0 out of 9).

III. Significant responses were given for the following possible mood and functioning issues in the last 12 months:

- a. **Thoughts of hurting myself** (9 out of 9):
1. Thinking about suicide.
 2. Sometimes wishing not to be alive.
 3. Thinking of how to commit suicide.
 4. Thinking of when or where to commit suicide.
 5. Making some plans on how to commit suicide.
 6. Taking one or more steps on a plan to commit suicide.
 7. Wondering if others would be better off without me.
 8. Feelings of not being important or useful to others.
 9. Doing really dangerous or risky things that could have led to my being killed or seriously hurt.

Client's reflections on these 9 responses: These originally had to do with the molestation I was trying to forget. I'd say now it's equal parts that, the bad memories I have that chase me around, and depression over where I am and what has happened to my life.

- b. **Depression** (13 out of 13):
1. Feelings of doom or hopelessness.
 2. Loss of interest in things that used to interest me.
 3. Unusually sad—or sad more often than usual.
 4. Thinking about death more than usual.
 5. Painful feelings of guilt.
 6. Painful feelings of being worthless.
 7. Eating a lot more to deal with depression/sadness.
 8. Eating a lot less as a result of depression/sadness.
 9. Sleeping a lot more because of depression/sadness.
 10. A lot more trouble getting to sleep.
 11. A lot of trouble staying asleep.
 12. Unusual fatigue (tired much more than usual).
 13. Problems concentrating or being easily distracted.

Client's reflections on these 13 responses: I can't really add to what I've already said. I hope I've explained it well enough, but with the right person I could talk about this.

- c. **Dependence/Codependence** (13 out of 13):
1. A hard time making decisions on my own.
 2. Fear of losing others' approval if I disagree with them.
 3. Doing things I don't want just to make someone happy.
 4. Fear of people's anger or disapproval.
 5. Being easily used by someone acting irresponsibly.
 6. Needing others to take responsibility for most of the major things in my life.
 7. Not enough self-confidence to start projects or do them on my own.
 8. Feeling I can't take care of myself.
 9. Really needing a new relationship when a close relationship ends.

10. Not thinking of what I need or want because I'm thinking about what to do for someone else.
11. Taking care of responsibilities that actually belong to someone else.
12. Making excuses for others.
13. Continuing to give help to someone who doesn't use that help well.

Client's reflections on these 13 responses: Reading this list of Dependence/Codependence issues almost looks biographical to me. I think I've spent a lot of energy and life planning trying to find someone who can guide me. And too often the result has been an attachment to someone not good for me.

d. Other mood or functioning issue:

1. **Being more worried and nervous than other people.** This could be my circumstances, but it also seems to be just me. It's hard to explain. But in part I would explain it by saying I think I spend more time than anyone else I know trying to figure out what to do and how to survive. I'm worried and anxious to the point of terror at least part of every day. Mornings seem the worst, and I have to push through with some activity to try to rescue myself.
2. **Trouble with attention or staying focused.** My mind can get captured easily by bad memories and painful worry.
3. **Problems with thoughts that seem to race or that I can't control.** I'd say these are the thoughts of bad memories and worries/anxiety.
4. **Finding it hard to have close relationships.** I've failed at all that I ever tried outside my family.

i. Past suicide attempts: No.

20. Counseling history ([Up to Flags Page](#))

- a. **In counseling currently?:** No.
- b. **Using medications currently for mental or emotional issues?:** No.
- c. **Used medications in past for mental or emotional issues?:** No.
- d. **Prior counseling/therapy?:** No.
- e. **Participation in recovery or survivor groups?:** Yes. Here I've had classes in Sex Abuse Survival, NA, and Emotions Anonymous.

Part F: Life Patterns and Character and Mitigation Evidence

21. Client today ([Up to Flags Page](#))

- a. **Best things in client's life today:** My parents and brother, for sure. Also, there are some good people here mixed in with the dangerous ones. Sorting out the difference is the problem. I feel some satisfaction from my GED tutoring work.
- b. **Hardest or most challenging things in client's life today:** Prison, guilt, terrible memories, hopelessness, and "the dreads."
- c. **Worst events during incarceration:** Seeing the rapes and beatings, hearing the threats, having to wonder all the time what can happen, being away from a normal life—I'd say those things, and roughly in that order.
- d. **Spiritual or religious aspects of client's life:** I'm a Christian, the mostly a non-practicing one. I find myself appealing to God for help. That's about it.
- e. **Jobs and job training while incarcerated:** 1. November 1, 2020-November 1, 2021; Medical Companion. This is trained companionship service to disabled inmates and simultaneous training in medical safety. This involved being matched one-on-one with various disabled inmates (inmates with cancer, strokes, Alzheimer's, Lewy Body, other dementias, and recovery from surgeries). Then 2-4 hours a week I got classes on this health care. I was always rated "Superior/Highest" and was taken off only because the prison worries about burnout in this field (especially when one of our "Charges" passes away or must go into lockdown care).

2. November 1, 2021-present; GED tutoring. I've tutored hundreds of inmates in Math, English, and Writing for their GED examinations. I love this work and still get letters of thanks from inmates I

helped. I've always been rated "Superior/Highest."

I have copies of the high marks and kind letters written by my supervisors in both test jobs.

- f. Classes/education while incarcerated:** 1. "Introduction to The 7 Habits of Highly Effective People," November 2, 2020-April 10, 2021; 18 classes of 2 hours each. Certificate dated April 10, 2021. This was an amazing class that helped me to know I'm in charge of my destiny (Habit 1: "Be Proactive") right on through the rest. I use every one of these every day and love to share them with anyone else who's interested.
2. "Not Aggressive, Not Passive, Just Peacefully Assertive," December 16, 2020-August 30, 2021; 64 two-hour classes (twice a week) on healthy relationships, mostly designed for people who have been in abusive or controlling relationships. It was 16 monthly classes on how being clean and sober is a product of wise decisions every day. Certificate dated August 30, 2021. I'm not sure I've ever had such an eye-opening experience. It was a joy to see how so many of the women learned, grew, and blossomed in this class. So many of us have not known how to stand up for ourselves, choose good partners, and simply insist that we be treated with the consideration anyone should receive. The instructors were a combination of volunteers from the outside and the best counselors here. Just amazing. "Treat yourself like someone you're responsible to help"—I hope never to forget these lessons, and to never stop sharing them with other women.
3. "First Things First," April 15, 2021- December 1, 2021; weekly classes pulling together Covey's 7 Habits by relating the all to Step 3: "Put First Things First." For everyone who stayed with it, this class put a bright light on how much we can accomplish when we use our time and priorities well, even in the recreation and leisure we choose. All inmates should have this—it drives home how much we can all grow by "using time, not just doing time." Certificate dated December 1, 2021. Truly powerful.
4. "Surviving and Thriving After Abuse," December 1, 2021-present; weekly classes on rising above abuse of all kinds, including by putting one's recovery to a good use like helping others. Certificate is upcoming. The instructors were outside volunteers from our community college and were amazing. So many of us for the first time were able to face terrible things that had happened to us and stop being victims.
5. "Relationships and Their Effects," January 16, 2022-present; weekly classes on how we're all affected more than we realize by who we hang with AND who we avoid. The slogan was, "You're the average of the 5 people you spend the most time with," and this really hit home to all of us. Certificate is upcoming.
- g. Counseling, drug/alcohol recovery fellowship, religious groups, and other personal growth while incarcerated:** In addition to the classes above, I've been in "Emotions Anonymous" and "Survivors Alive" since I got here. These are tremendous recovery groups organized around the messages from our classes but then led by us inmates ourselves. These have done more than I can say to show us how to get a handle on our abuse (whether from childhood or adult abuse). The greatest lesson for me has been how much control I can get over what happened to me by putting it to good use, most often in the form of encouraging other survivors.
- h. Other measures at self-improvement during incarceration:** I read, study, try to be of service to others, and am very careful about who I let into my inner life. I'll help anyone who sincerely wants it, but I allow only healthy people into my "inner journey."
- i. Rules/conduct violations during this incarceration:** Only I had one write-up for anything. February 1, 2022, for supposedly missing count. I was actually at a required training for my job, and I was found, "Not guilty."
- j. Assistance to the institution/facility during incarceration:** Please see what I've written about my jobs. But also, I often hear from inmates, supervisors, instructors, and even staff about how I'm a help to the mood of people and the entire facility. I'm a little embarrassed to talk about this, but I can give you the names of inmates and others who are happy to share their thoughts about this.
- k. Living arrangement plans:** With my parents. They are ready, willing, and able—and even anxious—to help with this.
- l. Work plans:** I have job offers from 3 businesses my family and I have connections with. But I also hope I can volunteer at our local mental health facility in helping female survivors.
- m. Other release resources:** Definitely counseling, a good survivor's group (I'm in touch with one now—"The Survival Option"—that meets 3 times a week close to my parents' home), and good relationships of all kinds.
- n. Special upcoming opportunities or circumstances:** Well, almost everyone wants out, and I don't want to invent anything special about my circumstances. I think I would rather talk about this in

person.

- o. **Client plans for more steps supporting release:** I am already signed up for the maximum of work and programs available to me. I will continue to work all of them as hard and as well as I can. I would be doing this whether or not I was getting credit for it.
- p. **Other important information about the relief sought:** I'm happy to answer any questions about this. At the moment I can't think of anything further to say. I really appreciate your asking about these things. They tell so much about the inmates who are committed to a better life and better service to the community.

22. Client's thoughts on the future ([Up to Flags Page](#))

a. **Wish for changes in the following areas:**

- 1. **Education.** I would like to have a college degree, and perhaps a professional degree in counseling for young women. I'm taking all the courses that I can right now and reading when my concentration will allow.
 - 2. **Alcohol or drug use.** I know that I need to develop a stronger and stronger hold on my sobriety and staying clean and sober. I have been working diligently on this. Presently, that means knowing all of the 12 Steps and being able to apply them every day.
 - 3. **Counseling.** The counselors here really are not counselors in that sense, but I would be interested in more help to get my thoughts and depression under control.
 - 4. **Ways of handling problems.** I need to continue to grow in all the ways that have been suggested to me. I need to have more trust in myself and better judgment about who to reach out to. Of course, I need to stay clean and sober.
 - 5. **Better use of a personal strength or skill.** As I develop more of these, yes, I would like to have a better sense that I can rely on them instead of turning to dangerous people. I need to give up the idea that I draw my strength from being around aggressive people who show dangerous strength.
- b. **Client goals:** I would like to earn the right for an earlier release. I would like to remain close to my family, even taking my parents up on the idea of moving back home. I would like to put my difficult experiences to good use for the sake of girls and young women.
- c. **Specific things client thinks a judge would like to see 4 months from now:** I think a court would want to see my sobriety. And could see me coming to terms with my molestation, bad memories, and depression, to name a few.
- d. **Something good the client can imagine coming from current challenges:** Of course. I'm trying every day to make those good outcomes happen.

23. Character and mitigation evidence ([Up to Flags Page](#))

- a. **Best accomplishments:** I would include staying away from drugs and alcohol here in prison (they are everywhere), getting my GED, tutoring other GED students, taking advanced classes, and learning to be a successful person.
- b. **Personal strengths:** I would say kindness, hard work (when my concentration is not broken with bad thoughts), consideration for others, and persistence.
- c. **People client is currently helping (or who currently rely on client):** I don't really have people who rely on me today. Some fellow inmates say that I have a good example for them, but I don't really look at it that way.
- d. **Other people client has helped:** I have always tried to be a kind and helpful person. I can't say that I have accomplished a great deal in terms of formal service to others. I very much want to.
- e. **Client's Index of Supporters:**

- 1. **Harold DeGroot:**
 - a. **Relation to client:** Father.
 - b. **Trustworthiness:** It is an exceptionally responsible, religious, thoughtful, and giving person. He's accomplished at his factory supervisor job, in his church, in our neighborhood, and his family. I have never heard of negative.
 - c. **Contact information:** 260-950-3434.
 - d. **Specific help:** My dad would do anything to help me. This includes housing, support, medical insurance, helping getting a job, as well as personal inland life guidance.

- 2. **Dotty DeGroot:**
 - a. **Relation to client:** Mother.
 - b. **Trustworthiness:** My mother is the straightest person in the world. She volunteers at the church, has worked as a school secretary for over 30 years, and helps everyone.
 - c. **Contact information:** 260-950-5038.
 - d. **Specific help:** My mother would do anything to help me. She feels especially bad that she did not know about the molestation when I was young. Everything fell in place for her (for me) when this came out.
- 3. **Michael DrGroot:**
 - a. **Relation to client:** Brother.
 - b. **Trustworthiness:** Echo is a fantastic individual. He is a high school social studies teacher and wrestling coach. He was a great younger brother, and I actually look to him for guidance now.
 - c. **Contact information:** 260-950-2284.
 - d. **Specific help:** Michael would do anything to help me. He and his wife (Patricia) are fantastic people. They have two small children I miss desperately.

f. **Other information judge/jury should know?:** No.

New thoughts

Any new thoughts as a result of using this Defense Map?: Yes. I certainly feel more hopeful knowing that someone is asking these questions of me to move forward with my life.

Final information/thoughts client wishes to share: I'm extremely grateful for this opportunity. Just that. Extremely grateful. Thank you so much.

Notes:

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