



**CONFIDENTIAL DEFENSE MAP FOR  
GARRY ROBERT DILLON (GARRY)**  
from DefenseMap.com

**First completed:** April 11, 2018 (time 3:39)

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**Total time:** 4:27

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**Adult case**

- a. Case Description:** A new case (no conviction, sentence, or dismissal yet).
- b. Charges/Investigation:** 3 counts of capital murder (the prosecution is seeking the death penalty on these), 3 counts of aiding and abetting murder, 3 counts of felony murder, and burglary.
- c. Case Type:** State case.
- d. Court/Locale:** Hamilton Superior Court.; Hamilton County, Indiana, USA.
- e. Custody/Probation/Parole:** In custody (I am in custody on these charges.)/Not on probation/Not on parole.

**Birth/Race/Gender**

- f. Age:** 29.
- g. Race:** White; Not Hispanic/Latino.
- h. Gender:** Male.

**Contact information**

- i. Address:** Hamilton County Detention Complex, Carmel, Indiana 46280.
- j. Primary Telephone:** None.
- k. Email:** garryrobertdillon99@msn.com.
- l. Emergency Contacts:**

[Unanswered.]

**Professional(s):** Charlie Asher (Attorney); Kylea Asher (Attorney).

## Flags

### Important notes to client on use of this Defense Map and these 6 Flags.

- ✓ The following 6 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. **How correct/fair the client considers the charges** ([Section 2, p. 4](#)): Partly correct and fair (1 out of 2).
2. **Past/other cases:**
  - **Past arrests and charges** ([Section 3, p. 5](#)): Prior record disclosed.
3. **Physical health** ([Section 6, p. 5](#)): Significant health issue disclosed.
4. **Outlook and functioning:**
  - **PTSD/Repeating bad memories or nightmares** ([Section 11, p. 7](#)): Potential PTSD issue disclosed.
  - **Childhood years** ([Section 12, p. 8](#)): 10 childhood assets reported as either partly or completely missing, and 45 childhood challenges disclosed. The client's responses show an Adverse Childhood Experience (ACE) score of 8 out of 10.
  - **Adult years** ([Section 14, p. 11](#)): 14 of 14 important life assets either missing or partially missing.
  - **Addictive patterns** 2 possible issue(s) disclosed.
    - **Use of alcohol** ([Section 15, p. 11](#)): 5 significant responses, a serious indication (2 out of 2) of a possible alcohol issue.
    - **Use of drugs (other than alcohol)** ([Section 16, p. 12](#)): 20 significant responses, a serious indication (2 out of 2) of a possible drug issue.
  - **Mood and functioning issues** ([Section 18, p. 13](#)): 4 possible issues disclosed.
    - **Suicide attempt history:** 2.
    - **Thoughts of hurting myself:** 6 significant responses.
    - **Depression:** 8 significant responses.
    - **Finding it hard to have close relationships.**
5. **The client reports a wish to make changes in these 6 areas of life** ([Section 21, p. 14](#)):
  - **Relationships** (details on p. 14).
  - **Education** (details on p. 14).
  - **Alcohol or drug use** (details on p. 14).
  - **Counseling** (details on p. 14).
  - **Ways of handling problems** (details on p. 14).
  - **Better use of a personal strength or skill** (details on p. 14).
6. **Character and mitigation evidence** ([Section 22, p. 14](#)).

Action ideas of attorney and client after reading this Flags page:

**NOTE: Special attention may be warranted for the information summarized in Flags 4 and 5 above. Useful options may include (a) an addiction evaluation, (b) a counseling/therapy evaluation, and (c) any other course of action counsel and client think could be helpful.**

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## Summary of Sections

### Part A: Legal

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### Part B: Basic Profile

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7. Family and other important relationships ([p. 6](#)).
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### Part C: Personal Challenges

11. PTSD/Repeating bad memories or nightmares ([p. 7](#)).
12. Childhood years ([p. 8](#)).
13. One or more controlling or hurtful partners ([p. 10](#)).
14. Adult years ([p. 11](#)).

### Part D: Addictive Patterns

15. Use of alcohol ([p. 11](#)).
16. Use of drugs (other than alcohol) ([p. 12](#)).
17. Other abuse or addiction issues ([p. 13](#)).

### Part E: Personal Functioning

18. Mood and functioning issues ([p. 13](#)).
19. Counseling history ([p. 13](#)).

### Part F: Life Patterns and Character and Mitigation Evidence

20. Client today ([p. 14](#)).
21. Client's thoughts on the future ([p. 14](#)).
22. Character and mitigation evidence ([p. 14](#)).

## Sections

### Part A: Legal

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

Sometimes it seems like my mind has stopped. I would like to see a future worth having, but to survive it seems like I almost need to give up the idea of a future. I never meant to hurt anyone, but the press, the TV, everybody talks about me like I'm a monster. I don't see a way forward in my life.

I'm not sure this answer helps much, but that's how things look and feel to me now.

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

- a. **Details:** I have been a heroin addict for almost 6 years, starting when my doctor said he couldn't give me any more pain medication for my back injury. I had to turn to heroin.

I used to buy heroin with the money I got from shoplifting and returning items to stores and getting refunds. When that dried up (I got well known in town and then banned from stores), I agreed with Leonard Willis and Jake Atwood to do some burglaries. These started about 6 months ago, and we did about 10. These would give me a boost of money that would last me longer than shoplifting money.

About 2 months ago we tried to steal from the house where these crimes happened. I was sick and withdrawing bad. Leonard would bring a gun in case things went bad. (I NEVER imagined the gun would be fired, let alone fired at anyone.)

It was a gun I had given him when all these burglaries started. The house was in the country (I think about 4 miles north of Noblesville) on State Road 119. We got there about 10 p.m., and it looked like no one was home. We were going through the house when the people came home. A grandmother, mother, and boy.

The grandmother started yelling at us, Leonard (and I think Jake) started yelling at her. Leonard and Jake wanted them to hand over their phones so they couldn't call the police. It was crazy, and I just wanted us to get out of there. After maybe a minute of this yelling Leonard pulled out the gun. He was waving it and yelling for the people's phones. The boy (who I later heard was 10 years old) was crying and yelling for the phones to be handed over. The gun went off. I don't think Leonard wanted to shoot, but the boy was struck, and he looked dead.

Jake yelled to Leonard something like, "You know what you have to do!" I jumped somewhat between Leonard and the ladies because I feared what Jake meant by this. There was more yelling I couldn't really make out at the time and can't really recall now.

My trying to stop the shooting failed. Leonard shot the grandmother and mother. It was in that order, I remember--because I'll never forget the mother pleading for her life and the chance to check her son.

We ran.

We got picked up about an hour later on the north side of Indianapolis. I was in the backseat (where the gun was, too). Leonard started screaming, "I didn't shoot it! I didn't shoot it!" Which was false, he did. It's now on the news that Leonard has made a deal to testify that I shot the 3 people.

The police grabbed all of us. One yelled that I was the one near the gun in the car and had the most blood on me. I didn't argue with them, but I think the blood was more on me than the others because I tried to stand near them and stop any thought of hurting them.

- b. **Contributing factors:** I think we need to talk about this in person. But, I was so sick. (And I'm sick more than I can say about what happened.) It was horrible thinking on the part of all 3 of us.

I just need to talk about this in person with my attorneys.

- c. **How correct/fair the client considers the charges:** Partly correct and fair (1 out of 2). I was there. But I didn't shoot anyone. And I never would have.

- d. **Initial comments on evidence and witnesses:** Yes. There's a lot to talk about here.

- e. **Interaction/statements with law enforcement:** We were arrested. I didn't fight them or make any statements. They made several statements about me being in the backseat with the gun. And my having more blood on me than the other two.

They wanted to take a statement, but with Leonard already lying about not being the shooter (and my basic knowledge of the legal system from my prior involvement with it), I declined.

- f. **Client discussions with others about the events?:** No.
- g. **Victims?:** Yes. Obviously, three people are dead. It's beyond terrible.
- h. **Thoughts looking back at the events:** I'm sick about this. I'd do anything to undo this. Anything.
- i. **Any other current charges?:** No.

3. **Past cases and arrests** ([Up to Flags Page](#))

- a. **Juvenile cases:** 6. I think I had 6 cases as a juvenile, starting with public intoxication and using alcohol as a minor. I was about 12 at the time these arrests started. After that, I had cases for using alcohol, using weed, and truancy. I did some time in juvie on (I think) 2 of these. I finally got "timed out" of the system when I was 19. The judge said something like, "You're not the best or the worst kid I ever saw, but I don't see how we're making any headway trying to work with you."

- b. **Other adult cases:** 4.

**Details:** I had 3 shoplifting charges to get money for heroin. The public defenders were my lawyers. I got probation on 2 of those and 10 days in jail on the third.

I was also arrested during a traffic stop about a year ago for possession of a syringe. I got another misdemeanor and had just finished the probation on that when this arrest happened.

- c. **Any other arrests?:** No.

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

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

## **Part B: Basic Profile**

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

None.

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

- a. **Overall health:** Poor (0 out of 2). I've been through some terrible withdrawals during this time in jail. I'm in serious pain from a back injury from 6 years ago.

I'm an addict. I think I have a lot of problems from that.

These problems are related. I had a serious back injury 6 years ago while working on a road crew laying asphalt. A large "side slide" of asphalt (this is the name of asphalt that sometimes gets stuck on the side of a dump truck that then comes down unexpectedly) broke loose and smashed into me. I had 2 broken vertebra and a badly bulged disk. The 2 surgeries fixed only some of the problems, and I was left with unbelievable pain. My doctors gave me opioids and told me they were shown to be not addictive.

What I discovered was that for the first time in my life since I was 11, I could stop being tortured by reminders of 2 years of sex abuse that happened to me starting when I was 11. The drugs numbed my mental pain even better than my physical pain.

The problem came when my doctor (Dr. Ken Donaldson) told me that he (along with other doctors) had been lied to by drug manufacturers and that the drugs could actually be very addictive. So, he cut me off. I pushed him as far as I could and got about another 2 months of drugs but then had to turn to heroin. The rest is obviously a very, very bad story.

- b. **History of head injury?:** Yes. When I was 8-10, I was hit in the head many times by a boyfriend of my mother. Some of the times I would either blank out or black out--and usually have headaches or

dizziness for either an hour or two or up to a couple of days. This happened maybe 10 times, but my mom said it was more.

I never received treatment, except once when the punch made my eye so cut and bruised my mom took me to the ER. My mom and I agreed we should lie and say I fell down the stairs. I got 4 stitches, some drops, and a patch I wore for a week or so. We were told to see my doctor, but I don't think we did. My mom's boyfriend was mad we had even gone to the ER, so it was basically decided we wouldn't go back.

- c. **History of losing consciousness?:** Yes. Well, there were the times when I was hit that I just wrote about.

And I have used a lot of drugs and have been unconscious from them many times (hundreds).

- d. **Diagnosed with brain injury or disease?:** No.
- e. **Other serious physical problems or disabilities?:** No.
- f. **Major surgeries?:** Yes. I had the 2 back surgeries.
- g. **Currently on medications?:** Yes. Well, it's not nearly enough, but I've been given a lot of Advil by the jail nurse for my back.
- i. **Other important medical information?:** No.

7. **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:** I don't think I have any. I get the feeling my attorneys now care about me, but I'm not sure that is "helpful" in the way I'm living.
- e. **Current unhealthy or hurtful relationships?:** Maybe. I need to think about this. And maybe talk about this in person. As an addict, you really have only bad relationships.
- f. **Other impactful people in client's life currently?:** No.

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

- b. **Extent/description of education:** I dropped out of school in the middle of the 11th grade.

I tested extremely high in middle school but immediately started having problems when the sex abuse started. My grades went from straight As to mostly Bs and Cs. People talked like this was due to the alcohol and such I was getting into. But really I think all these things (the problems in school the drinking, then getting arrested, etc.) collectively grew out of trying to deal with the sex abuse.

By 10th grade, I was doing better, mostly because I found some friends and recognition in playing football, wrestling, and baseball. But I had some run-ins at school with teachers and got kicked out of sports. With that, things nosedived for me at school, and I quit around Christmas of my junior (11th grade) year.

- a. **Currently in school?:** No.
- c. **Success in school:** Some (1 out of 2). I had some friends. I was good at football, wrestling, and baseball, but my quarrels with some teachers got me more or less kicked off those teams, and I didn't have a reason to stay in school after that.

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

- a. **Employed?:** No. I'm in jail. I last worked at US Steel as a welder assistant about a year ago. It was a "contingent hire," and I was let go when the first drug test came back positive for heroin.
- b. **Prior work experience:** I worked at Citizen's Construction Company for 3 years until the back injury I had there that led to the opiate problems. The owner (Thomas Richardson) loved my work and my commitment. I was never able to return to that work. So I had some odd jobs afterwards. I would apply sealant for some people's driveways, but even that was too hard.

c. **Any other important information about employment or work history?:** No.

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

- a. **Currently:** I'm in a single cell on a death case, so I just try to pass the time. I read a lot, write to some people some, listen to the radio, and watch my TV.
- b. **Consequences from ways client has used free time:** My mind seems like it's turned to cotton. There's so little hope here, for me or anyone. Even the guards seem down about us.

**Part C: Personal Challenges**

11. **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:** 2.
- c. **Events:** Well, I say there were 2 events. But the first one was actually maybe 50-60. They were when a youth leader (Arnold Simmons) at our church molested me. He later went to prison when he was found doing this to some other kids. He took an interest in me and convinced my parents (and me) he could be a great person in my life (given the mess my family was).

After about a month of doing things with me about 1 or 2 times a week (bowling, ball games, and videos), he started having me stay overnight at his apartment. The second night I stayed over, he had sex with me. And this continued for almost 2 years. I would rather not write more about this now. I can talk to my lawyers about this in person if they want. I will say these memories and the feelings of being disgusting have haunted me ever since.

I think 2 things made the thoughts of the sex abuse worse. First, when I tried to tell my mom about it, she told me, "Shut up and just deal with whatever YOU did." Second, years later my abuser got prosecuted and sentenced for abusing a bunch of other boys, and I've always wondered who got hurt because I didn't step forward.

The second "event" was this crime and the killings. I'd also rather not write more about this right here. I can still hear the yelling, the mom begging not to be shot so she could get to her son, and more. And the horror of seeing those 3 destroyed bodies. This is never out of my mind, night or day.

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. Memory problems.
  12. Feeling angry a lot.
  13. Problems with angry outbursts or aggressive behavior.
  14. Difficulty keeping close relationships.
  15. Almost always being on guard for danger.
  16. Being easily startled or frightened.
  17. A lot of guilt or shame.
  18. Trouble concentrating.
  19. Trouble sleeping.
- e. **Any connection between these experiences/PTSD and legal problems (including this case)?:** Yes. I don't want to make excuses at all, especially because of the guilt I have about these deaths. But definitely my drug use (which led to all of this) came about from the abuse I that happened.
- f. **Other PTSD information?:** Yes. But I'd rather talk about this in person.



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

- a. **Client most wants understood about childhood:** My parents had nonstop chaos in their lives, and no wish to raise me. So about age 11, I was raised mostly by my grandmother, and she seemed to hate it. And probably hated me, too. My parents couldn't stand each other and neither one wanted me.
- b. **Childhood assets. Regarding 10 possible important childhood assets, the client reported the following:**
- **Present in client's childhood:** 0.
  - **Somewhat present in client's childhood:**
    1. **Other loving family members.** There were a couple aunts and uncles who were nice to see, but I didn't see them often.
    2. **An overall good experience with school.** Okay until my grades fell apart and I got kicked off my teams. Then I had no reason to stay with it.
    3. **Good friends almost all the time.** They were probably all the wrong kind of friends, but I usually had one or two.
  - **Missing in client's childhood:**
    1. **A loving mother who stayed in my life.** I don't remember much of this, but I'm told I lived with my mom until I was about 3 or 3-1/2. She wanted to marry Darryl (which she did), and he didn't want responsibility for me. So, I got sent to live with my grandmother (my dad's mom). After that I saw my mom only by accident, maybe 5 times a year. For a while I would ask if I could see her, but then it got more painful to try than to just forget about it.
    2. **A loving father who stayed in my life.** This was about the same as with my mom, except he died in a truck accident when I was about 11. No one even took me to his funeral, which always struck me as strange.
    3. **Parents who stayed happily together.**
    4. **Peace within my family as a whole.** My memory was of fighting always. And no respect between people. It was nice of my grandmother to raise me, but she made sure I knew she hated it. And maybe me.
    5. **A family that was able to have disagreements but then peacefully settle them.** If "family" means my mom and dad, they never had a good word to say to each other. Or about each other.
    6. **A consistently safe home life.** There was some peace living at my grandmother's.
    7. **The feeling that I would have a good future.** At least from the time I was molested, I don't remember thinking much about a future. And it seemed odd and even irritating when anyone asked what I wanted to do in life.
- c. **Childhood challenges:**
- i. **Family structure during my childhood:**
    1. My father's death. He died when I was about 11. The last involvement he had in my life was signing off on my molester's getting a relationship with me. Maybe if he had been around, he could have protected me from some of that once it started.
    2. Times when my father was gone. Times when my father was gone.
    3. Times when my mother was gone. My mom just wasn't a mom. And wasn't interested in me.
    4. My parents were never together for any of my childhood.
    5. Being passed to the care of people other than my parents. This would have been my grandmother.
    6. Unsafe or unhealthy people brought into our home or family life. As a whole, my family didn't know or hang around with the best people. But the worst was inviting Arnold Simmons into my life.
  - ii. **Childhood sexual abuse:**
    1. Sexual abuse. See what I've written about this already. I'd rather not describe the details here.
    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. Threatened into sex or sexual touching.



7. An adult sending naked photos or videos.
- iii. Childhood attack or physical abuse (other than sexual):**
1. Hit or physically attacked. My grandmother lived in the Mark Field Trailer Park, and that was a pretty violent place. There were about 5 older kids who used to beat me up until I was about 12 or 13. As I got more athletic, these things stopped. But they were pretty violent, and I was taken to the ER at least twice. I was pretty afraid of them, especially because I didn't have a dad or other strong person to back me up.
  2. Threatened with being hit, physically attacked, or injured. This has to do with the same 5 kids who used to beat me up. I was pretty afraid of them all the time. All my grandmother could do was to tell me that I would have to "Toughen up."
  3. A crime against me.
  4. Physical abuse by a family member. My grandmother's punishment could be extremely hard. She usually used a paddle or belt, but sometimes she used an electrical cord. Sometimes she made me strip down for whippings. She would say that she had to do this, but I think she also just did not like me or the problems I brought into her life. As she used to say (sometimes while beating me), "This sure isn't the way I wanted to spend my golden years."
  5. Violent physical punishment.
  6. Physical punishment too often. I think this was two or three times a month usually until I was about 13.
  7. Any other physical injury.
- iv. Childhood emotional or verbal mistreatment or abuse:**
1. A lot of hurtful criticism/put-downs from my father. It was mostly my parents being gone that left me feeling put down, just so completely unwanted. And so much of a problem to everybody.
  2. A lot of hurtful criticism/put-downs from my mother.
  3. A lot of hurtful criticism/put-downs from someone other than a parent. I used to hear from my grandmother all the time what a problem I was. And how I would never be anybody, blah, blah, blah.
  4. Yelled at often. The same.
  5. Made to feel unwanted in the family. I know I was unwanted. Everybody knew that. It wasn't really a matter of a feeling.
  6. Any other emotional abuse by a family member.
  7. Emotional (including verbal/spoken) abuse by someone outside my family.
- v. Family members' functioning during my childhood:**
1. A family member with trouble controlling his/her anger. I think terrible tempers ran in our family. My grandmother, both my parents, and others.
  2. Alcohol or drug abuse by a member of the family. My parents both had problems with alcohol. My dad was arrested probably 5 times or more for driving drunk or public intoxication.
  3. Arrest or incarceration of one or more family members. My dad's drinking arrests.
- vi. Functioning of the family during my childhood:**
1. Times without enough food.
  2. Repeated conflict or loud arguments between my parents.
  3. Repeated conflict or loud arguments between people I lived with.
- vii. As a child, seeing something very upsetting or frightening:**
1. Seeing or hearing a serious accident or injury to someone. The bullies in my neighborhood laid a lot of good wood on several of us.
  2. Seeing or hearing someone stabbed. Two people were stabbed in our neighbor fights.
  3. Seeing or hearing someone attacked. Again, this went on a lot, in our neighborhood and, I'd say, even in our home.
  4. Seeing or hearing someone beaten.
  5. Seeing or hearing a violent fight.
  6. Seeing or hearing someone threatened.
  7. Seeing or hearing another very upsetting thing. Seeing my grandmother come at me with a paddle, belt, or cord was terrifying when I was young.
- viii. As a child, feeling responsible for something bad that happened:**
1. Feeling that I was supposed to stop or fix some problem in my family. I guess I felt that if I was a better kid or more fun or smarter or something, one of my parents would want me.

- ix. **Other childhood issues:**
1. Encouraged by someone to be violent to others. It sounds odd, but my grandmother actually wanted me to be more violent with the bullies in the neighborhood.
  2. Committing crimes. Little stuff. Some drinking. Nothing really bad.
  3. Drug use. I did a fair amount of weed to try to calm my mind and bad memories.
  4. Worries about my sexuality or others' acceptance of my sexuality.
- d. **Relationship with father (while growing up):** I had very little relationship with my father (0 out of 2).  
**Relationship with father (today):** My father is not living. I was 11 when he died. He was pretty much out of my life. The last involvement we had was his agreeing that the man who turned out to be my molester would be a good person for me to know and be with.
- e. **Relationship with mother (while growing up):** I had very little relationship with my mother (0 out of 2).  
**Relationship with mother (today):** I have very little relationship with my mother (0 out of 2).
- f. **Raised at any time by anyone other than mother or father?:** Yes. See what I've said about my grandmother.
- g. **Any other serious difficulties in childhood?:** Yes. Maybe. I guess that except for my time when I was in school sports, I was about the loneliest person ever.
- h. **ACE (Adverse Childhood Experience) Score:** 8 out of 10. The client answered Yes to the following standardized questions.
1. **Did a parent or other adult often either: Swear at you, insult you, put you down, or humiliate you? OR act in a way that made you afraid you might be physically hurt?**
  2. **Did a parent or other adult in the household either: Often push, grab, slap, or throw something at you? OR ever hit you so hard that you had marks or were injured?**
  3. **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?**
  4. **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?**
  5. **Did you often feel either: That you had no one to protect you, had to wear dirty clothes, or didn't have enough to eat? OR that your parents were too drunk or high to take care of you or take you to the doctor if you needed it?**
  6. **Were your parents ever separated, apart, or divorced?**
  7. **Was your mother or stepmother either: Often pushed, grabbed, slapped, or had something thrown at her? Or sometimes kicked, bitten, hit with a fist, or hit with something hard?**
  8. **Was a household member depressed or mentally ill, OR did a household member ever attempt suicide?**
- 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. I can only ask that my attorneys read what I've written about this. I will be completely honest in our meetings with them.

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

- a. **Any current involvement with a controlling or hurtful partner?:** No.
- b. **Past controlling/hurtful relationships?:** No.

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

a. **Current life assets. Among 14 possible important life assets, the client reported the following:**

- **Definitely present today:** 0.
- **Somewhat present today:**
  1. Safety in all parts of my life. Well, jail is both safe and unsafe.
  2. A safe place to live--without fear of losing it. Well, I'm locked up, and maybe for the rest of my life.
  3. Good feelings and trust for police and other authorities. Living as an addict pretty much makes trusting police hard. But I have to say police have been okay to me over the years.
  4. A spiritual life I'm happy with. I read the Bible and write back and forth with some religious people a little.
- **Missing today:**
  1. Good physical health. I'm an addict without treatment. I have debilitating pain in my back. I get a lot of colds, chest infections, flu, etc.
  2. Good peace of mind/freedom from worry most of the time.
  3. A lot of joy/happiness.
  4. A loving and helpful family life.
  5. At least 3 good and helpful friends I can call on anytime.
  6. Work I like.
  7. Volunteer work I like.
  8. A lot of purpose in my life/a feeling that my life matters to others.
  9. A good balance between work, rest, and play.
  10. Enough money/financial security.

- b. **Client describes his/her problems in adult life:** Looking over and over for a group to fit in with--because I wasn't part of anything. Being betrayed whenever I thought I had found someone who would help me or I could depend on. I think all my problems--and this terrible tragedy--probably came from that.

### Part D: Addictive Patterns

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

a. **Significant responses regarding use of alcohol:**

1. I've sometimes had more to drink than I initially set out to drink. Obviously, I don't drink now. But I used to have trouble staying to a sane amount on any given night.
2. A friend or family member has worried or complained about my drinking.
3. I've vomited (thrown up) from having too much to drink.
4. I've used drinking to deal with difficult feelings.
5. I have one or more blood relatives with alcohol or drug problems.

b. **Last used alcohol:** About 2 years ago.

c. **Any connection between alcohol and legal problems (including this case)?:** No.

- d. **Client's belief about having a problem with alcohol:** Probably. I just didn't drink like normal people. Too much. Too often way more than I thought I would drink.

But obviously, I turned to drugs as my main way of coping.

In retrospect, I could see I was using alcohol, even as a kid, to deal with the thoughts of the sex abuse.

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

**a. Significant drug responses:**

1. I've used some illegal drugs. I've used many drugs, mostly heroin.
2. I've sometimes not been able to stop using drugs. I've been completely addicted to heroin for about 6 years.
3. I've lied to get drugs.
4. I've done something illegal to get drugs.
5. I've had withdrawal symptoms or felt sick after using drugs.
6. Drug use has caused a problem in some area of my life.
7. I've sometimes felt bad or guilty about my drug use.
8. A friend or family member has worried or complained to me about my use of drugs.
9. I've used some prescription drugs illegally. I got addicted to heroin as a follow-up to the

Oxycontin and other pain meds I was given for my back injury about 6 years ago. But, when my doctor cut me off, I did sometimes use pain meds I bought on the street or got from friends to back up my heroin use.

10. I've used some prescription drugs other than as directed by a qualified doctor.
11. I've used some prescription drugs to get high.
12. I've used some prescription drugs to avoid getting sick from withdrawals.
13. I've gotten prescription drugs by using a doctor who gave them out carelessly or irresponsibly.
14. I've been arrested for drug possession.
15. I've used drugs while alone.
16. I've used drugs and alcohol at the same time. But usually, it was "drugs and drugs," not alcohol.
17. I've had "blackouts" or "flashbacks" as a result of drug use.
18. I've had medical problems because of drug use.
19. I've failed a drug test.
20. I've attended one or more meetings of N.A. (Narcotics Anonymous) or A.A. (Alcoholics Anonymous). A friend took me twice--about 4 years ago. I don't think they understood that drug abuse may also have saved my life from my obsessing about the sex abuse.

**b. Particular drugs used:**

1. Heroin (about 350 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).
5. Misused, or improperly used, prescription drugs (Mostly Oxycontin. There were some others, but only when Oxy and heroin weren't around. See what I've written.) (about 100 times in the last 12 months).

**c. Reflections on drug use:** I used to deal with a hatred of my life. The drugs took me over. I'd rather talk about this in person.

I'll be as honest as possible. I'd just rather talk about this in person instead of having to deal with it more by writing more here.

**d. Client's belief about having a problem with drugs:** Yes. I'm heavily addicted to heroin. As I've written, this started with the pain medications for my back injury and was followed when I felt the help they were with my memories of the sex abuse. When the drugs got cut off, I used mostly heroin, I'd say to almost save my life.

**e. Any connection between drugs and legal problems (including this case)?:** Yes. This was all about drugs.

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

- a. **Other addictive patterns or harmful habits?:** No.

**Part E: Personal Functioning**

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

I. **Past suicide attempts:** Yes.

- **Times:** 2.
- **What happened?:** I tried to overdose 2 times in the months before these murders/charges. I was revived both times by EMTs with Narcan.

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).
- c. **Dependence/Codependence** (0 out of 13).

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

a. **Thoughts of hurting myself** (6 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. Wondering if others would be better off without me.
6. Feelings of not being important or useful to others.

**Client's reflections on these 6 responses:** This is a terrible life. I'm filled with guilt, especially for the death of a child, even though I never wanted that to happen. I don't see getting out.

And if I got out, I don't know that drugs and I could ever co-exist. Or that I could live with them or without them.

b. **Depression** (8 out of 13):

1. Feelings of doom or hopelessness.
2. Unusually sad—or sad more often than usual.
3. Thinking about death more than usual.
4. Painful feelings of guilt.
5. Painful feelings of being worthless.
6. A lot more trouble getting to sleep.
7. A lot of trouble staying asleep.
8. Problems concentrating or being easily distracted.

**Client's reflections on these 8 responses:** I think anyone would be surprised that someone could survive with the thoughts I have in my head. The tragedy for me is that I never meant to hurt anybody, but now I'm seen as a complete beast. My life became a complete mess.

c. **Other mood or functioning issue:**

1. **Finding it hard to have close relationships.** I just don't reach out to people. I push them away.

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

- a. **In counseling currently?:** No.
- c. **Used medications in past for mental or emotional issues?:** Yes. All this may sound odd. But I did drugs, I think, to try to heal myself, or live with myself and with life.
- d. **Prior counseling/therapy?:** No.
- e. **Participation in recovery or survivor groups?:** No.

## Part F: Life Patterns and Character and Mitigation Evidence

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

- a. **Some good things in client's life today:** Nothing. Honestly, perhaps the thoughts that this can all be over before long.
- b. **Hard/challenging things in client's life today:** What's not hard--that would be easier to answer. Waking up each day to these realities--it's a pain I can't describe.
- c. **Spiritual or religious aspects of client's life:** I have faith in something. But it hurts to know any decent God would condemn so much of me.
- d. **Other things client would like attorney to know:** I'm drawing a blank on this. Sorry.

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

- a. **Wish for changes in the following areas:**
  1. **Relationships.** I'm not sure. But, It might be good to know some better or more healed people.
  2. **Education.** I say I'm interested in more education, but I also think this has to wait. If I get a lot of time, I definitely see myself as trying to improve myself. But this is really vague right now.
  3. **Alcohol or drug use.** Chemical sobriety is almost forced on me today.
  4. **Counseling.** I have so many issues, the horror of these crimes and my shame especially. And the abuse in my past.  
  
As with the choice to get more education, I think action on these things will have to wait. Things are so blurry right now.
  5. **Ways of handling problems.** Right now I'd just like an answer for myself of how to make something of this broken life. So defining the problem may be as far as I can get for now.
  6. **Better use of a personal strength or skill.** Same.
- b. **Client goals:** I'd need to think about this.
- c. **Specific things client thinks a judge would like to see 4 months from now:** I see the intent of this question. But, it doesn't work for me in these circumstances. For me, it's more a question of what I might judge myself for what I make of the next piece of time I have.
- d. **Something good the client can imagine coming from current challenges:** Not today. Not to equal the losses involved, for sure.

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

- a. **Best accomplishments:** I can't think of much. A few people who know about the sex abuse say it is to my credit that I'm even alive. "Sometimes surviving is being a hero," one once said.
- b. **Personal strengths:** I don't know. Maybe I'm too weak to have just killed myself. When I think about these three deaths, I often think it would have been better if I'd just died long ago.
- c. **People client is currently helping (or who currently rely on client):** No one presently, save for a few words of encouragement I can offer occasionally to a fellow inmate or guard. To my surprise, some people have reached out to me with letters of support. Two old teachers and three friends from some time ago who know some of what my life has been like. I haven't had the strength to respond yet.
- d. **Other people client has helped:** I have started a list of these. I'd like to speak with my attorney about the list.
- e. **Client's Index of Supporters:**

#### 1. **Tom Richardson:**

- a. **Relation to client:** He is the owner of the construction company (Citizens Construction) where I worked hard for 3 years until my disabling back injury.
- b. **Trustworthiness:** Tom is respected everywhere in the community. His company does great work, he's active in his church, and i don't know anyone who dislikes him.
- c. **Contact information:** You'd have to call Citizens Construction Company. He's there all the time--or reachable on his cell.
- d. **Specific help:** Tom liked me and appreciated my work. When I would bump into him on

the street after being unable to work for him, he still treated me with respect. I think he would like to help.

**2. Dr. Ken Donaldson:**

- a. **Relation to client:** My old doctor who treated me for my back pain and ended up telling me he couldn't give me any more Oxycontin, Vicodin, etc.
- b. **Trustworthiness:** A good guy and a doctor who (at least for me) tried hard to help.
- c. **Contact information:** I don't have a number or email address. I think he works for Trinity Medical Group.
- d. **Specific help:** I think Dr. Donaldson would be honest with any attorney who called him about me. He was honest in telling me he was sorry I was given too many opiates, which he said was because of the "propaganda of the drug manufacturers."

**3. Pastor Ken Rouse:**

- a. **Relation to client:** Head Pastor at the Zion Community Church. I got to know him when he and his church met with some of us street addicts.
- b. **Trustworthiness:** A complete gentlemen. Very active in the community.
- c. **Contact information:** I can't find the number right now. He's reachable at the Zion Community Church.
- d. **Specific help:** Pastor Rouse was always good to me. And caring. He's had some members of his church writing letters of encouragement and faith-building to me, and I've tried to write back as often as my mind will let me. I hope I can keep up some of those relationships--they are special people not to give up on someone like me.

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

**New thoughts**

**Any new thoughts as a result of using this Defense Map?:** Yes. Yes. Surprisingly enough. Maybe we can speak about it.

**Final information/thoughts client wishes to share:** I feel drained answering all of this. I had to take several breaks. I think I have no more to offer right now.

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