



**CONFIDENTIAL DEFENSE MAP FOR
JASON R. ANDERSON (JASON)**
from DefenseMap.com

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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:** Armed robbery and murder.

Client's position on the conviction(s): I am totally innocent 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. **Date of arrest:** January 7, 2010.

f. **Date of conviction:** July 31, 2010.

g. **Date of sentencing:** August 31, 2010.

h. **Sentence:** 50 plus 60 years (consecutive) for a total of 110 years.

i. **Time served so far:** Just over 12 years.

j. **Projected/expected release date on this case:** January 7, 2065.

l. **Other proceedings challenging the conviction or sentence?:** No.

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

k. **Completed appeal in this case?:** Yes. My PD raised only insufficiency of the evidence, prosecutorial misconduct for repeated references to my not testifying, and an excessive sentence. My convictions and sentences were affirmed on June 1, 2011.

n. **Case Type:** State case.

o. **Court/Locale:** Orleans Parish Criminal District Court; Orleans Parish, Louisiana, USA.

p. **Case number:** CR-F- 2010-OP-34232-7755.

q. **Defense counsel:** Paul Baker (now disbarred) was my attorney (PD) at trial and on appeal. Mr. William Stanley was attempting to assist me in a post-conviction case but passed away before he could finish preparing the case. He believed in my innocence and felt strongly about the issues in my favor.

r. **Prosecutor:** Suzanne Bradshaw.

s. **Judge:** Mansfield Chapman.

t. **Custody/Probation/Parole:** In custody (On this conviction and these sentences.)/Not on probation/Not on parole.

Downloaded March 22, 2022

ADULT DEFENSE MAP FOR JASON R. ANDERSON (JASON), p. 1/17

Birth/Race/Gender

- u. **Age:** 39.
- v. **Race:** Black; Not Hispanic/Latino.
- w. **Gender:** Male.

Contact information

- x. **Address:** Louisiana State Penitentiary, Inmate 10-646309, 17544 Tunica Trace, Angola, LA 70712.
- y. **Primary Telephone:** [Unanswered.]
Email: [Unanswered.]
- z. **Emergency Contacts:**
[Unanswered.]

Professional(s): Charlie Asher (Attorney); Jeffrey Kimmell (Attorney).

Notes:

Flags

Important notes to client on use of this Defense Map and these 10 Flags.

- ✓ The following 10 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](#)): Totally innocent.
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 e): January 7, 2010.
5. **Time served already** (Face sheet h): Just over 12 years.
6. **Plea of guilty?** ([Section 3, p. 6](#)): Did not plead guilty.
7. **Trial?** ([Section 3, p. 6](#)): Had a trial. To a jury.
8. **Client testified?** ([Section 3, p. 6](#)): No.

4. **Possible errors with verdict** ([Section 3, p. 6](#)). The client cites these 13 possible errors:

1. **Prosecutor misconduct.**
2. **Ineffective defense counsel.**
3. **Mistaken eyewitness identification.**
4. **An incorrect identification of me because of a suggestive process pointing to me.**
5. **Mistaken testimony from one or more witnesses.**
6. **Important evidence was not presented.**
7. **There was evidence favorable to me that was kept from the defense.**
8. **Bad science.**
9. **Imbalance of necessary resources.**
10. **One or more alibi witnesses were not called.**
11. **There is evidence of my innocence that wasn't tested.**
12. **Insufficient evidence to convict.**
13. **New evidence shows my innocence.**

5. **Expert/scientific topics potentially at issue** ([Section 3, p. 6](#)). The client cites these 2 potential expert/scientific issues:

1. **DNA**
2. **Hair comparisons**

6. **Asserts important evidence was not tested or not followed up on** ([Section 3, p. 6](#)).

7. **Past/other cases:**

- **Past arrests and charges** ([Section 4, p. 8](#)): Prior record disclosed.

8. **Outlook and functioning:**

1. **Childhood years** ([Section 13, p. 10](#)): 3 childhood assets reported as either partly or completely missing, and 20 childhood challenges disclosed. The client's responses show an Adverse Childhood Experience (ACE) score of 2 out of 10.
2. **Adult years** ([Section 15, p. 11](#)): 8 of 14 important life assets either missing or partially missing.
3. **Addictive patterns** 1 possible issue(s) disclosed.
 - a. **Use of drugs (other than alcohol)** ([Section 17, p. 12](#)): 1 significant responses, some indication

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. 8](#)).
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. 9](#)).
10. Employment ([p. 9](#)).
11. Use of free time ([p. 9](#)).

Part C: Personal Challenges

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

Part D: Addictive Patterns

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

Part E: Personal Functioning

19. Mood and functioning issues ([p. 12](#)).
20. Counseling history ([p. 13](#)).

Part F: Life Patterns and Character and Mitigation Evidence

21. Client today ([p. 13](#)).
22. Client's thoughts on the future ([p. 14](#)).
23. Character and mitigation evidence ([p. 15](#)).

Sections

Part A: Legal

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

I am innocent, and it is a depressing waste of my life not to be heard about that. Everything else is a nothing. I do miss my family and life opportunities more than I can say. My parents are both ailing and without my help. But I cannot help any of my family being punished for a crime I didn't commit.

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

- a. **Client's sense of personal safety:** Mostly unsafe. It's prison. For the most part I've learned who to trust and who to avoid, but this is a very dangerous place for someone not inclined to violence himself.
- b. **Emergency needs?:** Yes. I have a range of family needs too long to get into here.

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

- a. **The charge(s):** Murder and armed robbery of Kenneth Jones. The prosecution said I was responsible even though I wasn't there, there was no physical evidence tying me to the crime, the cap seen on the actual perpetrator and found at the scene didn't have my DNA on it (something the jury never heard about), and there was at least one description of the actual perpetrator that exonerated me but was never shared with the defense.
- b. **Client's position on the conviction(s):** I am totally innocent of the crime(s) I was convicted of.

The prosecution relied on 4 eyewitnesses, some of whom originally gave statements to the police looking very little like me. But they all identified me in court, and I guess the jury just believed them.

I was at the home of my cousin and his wife (Pierre and Sandra Smith) the entire day and had nothing to do with this. Some of the first statements to police said the perpetrator was around 5'6" and 200 pounds, either Hispanic or light black in color. For my whole adult life, I have been 5'10" and around 175 pounds, and I am a dark-skinned black man.

The witnesses said the perpetrator was wearing blue jeans and a white or light jacket. I admit I was in blue jeans when I was arrested 4 hours after the robbery/murder, but I don't own a white or light jacket.

There was no DNA or other physical evidence tying me to this terrible crime. In fact, a gray cap was found at the scene not belonging to the victim and fitting the description given by two of the witnesses as belonging to the perpetrator. For the entire time the case was being prepared, the prosecution was claiming that was my cap and it was being tested for DNA and hair samples. (I voluntarily gave samples of my DNA and hair.) But 9 days before the trial the prosecutor called my attorney and said my DNA and hair weren't found on the gray cap.

But the jury never heard about how I wasn't on any of the DNA or hair strands. I repeatedly asked my attorney how we would present this. He initially said he'd be sure the jury knew. But by the time of trial he said we should just rely on the prosecution NOT having a match of me to the cap. He said our defense was too strong to need this. But later on he admitted he just wasn't able to pull together what he called "the chain-of-custody and expert testing" to make the case. So, the jury just never heard about any of the testing that was done or how I was excluded.

My attorney also failed to call my cousins to show I was with them. And he talked me out of testifying. On all these points he just claimed the case against me was so weak, it was best "not to muddy the waters" (a phrase he used several times) and that I would be found not guilty. (On the matter of not calling my alibi witnesses, I actually think my attorney had failed to comply with the the alibi notice requirements, so he just wanted to pretend they weren't important witnesses.)

I didn't think of it at the time, but since my conviction (and with the help of the PC attorney I was hoping to use until his sudden death) we've been asking that the DNA and hair stands on the cap be compared to law enforcement databases to find its owner. But the State has refused.

- c. **Interaction/statements with law enforcement:** I guess the police heard that there was a black

person visiting the Smiths (my cousins). They came with 2 of the witnesses who then said I was the person. I was arrested immediately. I started to give a statement but was treated with so much suspicion and sarcasm, I said I wanted an attorney. That was all we had to say to each other.

- d. **Client discussions with others about the events?:** Yes. I've told my family, friends, and many other people the basic facts that I had nothing to do with Mr. Jones' death, that I thought my trial was unfair, etc. I don't think I've ever said anything that is harmful to my case.
- e. **Pled guilty?:** No.
- f. **Had a trial?:** Yes. To a jury.
- g. **Defense theory of the case:** As I've said here, I was totally innocent. I had nothing to do with this tragic murder.
- h. **Belief about reasons for guilty verdict:**
 1. Eyewitnesses were coached to change their description of who they saw.
 2. One of the eyewitness's misidentification of me (the one that was most unlike me) wasn't shared with my attorney until after the trial.
 3. The jury was never told that the cap was tested for DNA and hair strands--or that nothing on it matched me.
 4. The prosecutor made 2 references to my not testifying (which was maddening because I wanted to testify).
 5. My alibi witnesses weren't called.
 6. The State has refused to compare the DNA and hair samples with databanks that could find the real killer.
 7. I think my attorney made many mistakes about all of these.
- i. **Client testified?:** No. This was 100% because my attorney said we didn't need it and shouldn't offer it. I think it was because he didn't want to spend the time to go over my testimony and offer it at trial.

Also, if he called me and couldn't offer any of the alibi witnesses who backed me up (my cousins), his error in not filing a notice of alibi would have been an embarrassment to him (and made my testimony look weak for not calling the people I said I was with).

- j. **Defense witnesses at trial?:** None.
- k. **Possible errors with verdict:**
 1. **Prosecutor misconduct.** The prosecutor twice told the jury I hadn't testified.
 2. **Ineffective defense counsel.** See above.
 3. **Mistaken eyewitness identification.** See above.
 4. **An incorrect identification of me because of a suggestive process pointing to me.** I think the twisting of the eyewitnesses' testimony actually started when the police showed me to two them and they said I was the murderer.
 5. **Mistaken testimony from one or more witnesses.** All the eyewitnesses were mistaken.
 6. **Important evidence was not presented.** See above. The "non-match" of me to the DNA and hair on the cap. The possible match to someone else that has never been followed up on.
 7. **There was evidence favorable to me that was kept from the defense.** See above. One of the especially mistaken descriptions of me wasn't shared with the defense until after trial (and then only by accident).
 8. **Bad science.** See above. I would call this "non-science"--not telling the jury the truth about the DNA and hair samples.
 9. **Imbalance of necessary resources.** I'm not a judge or lawyer, but the imbalance of resources I saw was almost a joke. I didn't dislike my attorney. But he had none of the tools the prosecution had.
 10. **One or more alibi witnesses were not called.** See above.
 11. **There is evidence of my innocence that wasn't tested.** See above. We didn't get the databank comparison that could have found the real murderer.
 12. **Insufficient evidence to convict.** I felt so, but the appeals court didn't.
 13. **New evidence shows my innocence.** I think it will if we are allowed to get it. Again, I'm speaking of the DNA comparisons/databanks.

- l. Expert/scientific topics potentially at issue:**
 - 1. **DNA.** See above.
 - 2. **Hair comparisons.** See above.
 - m. Know of any important evidence not tested/followed up on?:** Yes. Again, the DNA and hair samples on the cap could have been compared to the databanks. They still could be. And for all I know, they have been and someone else has been shown guilty.
 - n. An illegal sentence or illegal sentencing procedure?:** No.
 - o. Additional errors?:** No.
- 4. Other criminal cases/arrests** ([Up to Flags Page](#))
- a. Juvenile cases:** 1. Vandalism. I was a stupid 16-year-old with some other stupid teens. We all got 6 months probation and an order to pay for the damage to the school.
 - b. Other adult cases:** 0.
 - c. Any other arrests?:** No.
 - d. Other live cases?:** No.
 - e. Most shocking/difficult aspects of any (and all) arrests and detentions:** We would have to talk about this in person. I feel a terrible depression over being falsely accused and convicted.
- 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?:** Yes. I have been given some anti-depressants in prison, but not presently.
 - h. Medical condition making incarceration dangerous?:** No.
 - 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:** I hope it'd be okay to break these into 3 groups:
(1) my family, close friends, and prison volunteers, (2) fellow inmates I respect a lot, and (3) staff, supervisors, and instructors I respect a lot.

1. My parents (Leonard and Sarah Morris), my sister (Tanisha Morris), my cousins (Pierre and Sandra Smith), friends (Nate and Louis Cross, Otto Crandall, and Elizabeth Payne), and prison volunteers (Tom and Marcia Jenkins).

2. Fellow inmates. These are men who are consciously committed to each other's growth. We encourage each other, take every course and program we can, and sign up for every volunteer project we can. Men come and go depending on prison transfers and such, but the group has stayed remarkably stable for at least 5 years. Kendall Anderson, Michael Rowe, John Connors, Jonathon Hite, Tommy Garcia, and me.

3. Counselors Karla Gregg, Jarred Pullin, and Thomas Banks. Supervisors John Reynolds and Janine Carter. Instructors Merle Grant (Literature and Creative Writing), Nathan Auxier (Mathematics and Computations), and Michael Gregory and Leo Phillips (Life Skills, Sobriety in 3 Dimensions, and Shackles On/Shackles Off).

- e. **Current unhealthy or hurtful relationships?:** No.
- f. **Other impactful people in client's life currently?:** No.

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

- b. **Extent/description of education:** I got my GED here in 2015 and have been taking classes all along the way. I had dropped out of high school in Chicago in the 10th grade.
- a. **Currently in school?:** No.
- c. **Success in school:** A lot (2 out of 2). I had no commitment to education in public school on the outside. I wish I had, and I had parents who stressed it--so that was my fault. But education has been a priority for me while incarcerated. I have finished over 30 courses, all with the highest grade attainable.

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

- a. **Employed?:** Yes. I'm a certified Inmate Firefighter. I'm trained in fire prevention, fire fighting, and emergency communications (the linkage between inmates, staff firefighters, and public responders).
- b. **Prior work experience:** On the outside I had learned and practiced typesetting, data entry, and some basic carpentry.
- c. **Any other important information about employment or work history?:** No.

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

- a. **Currently:** I try to make the absolute best of my time, which makes me (and my "Growth Cell" buddies) something of an oddity here. But it is the best way to, as we say, "Use your time, don't just do your time." The days pass better with this purpose and trying to be of help to others who are interested, especially young and "reachable" inmates.
- b. **Consequences from ways client has used free time:** I'd say the good use I make of my time makes me a better person overall and also somewhat less bitter than I might be over this conviction. The advantages of growing--well, that would be true on the inside or the outside. I feel better about myself and this experience by being a help to others (whether that's the staff who care, deserving inmates, or the prison as a whole).

Notes:

Part C: Personal Challenges

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

- a. **PTSD?:** No issue indicated.
- b. **Most shocking or upsetting experience:** My arrest in this case, no question about it. And being assumed and treated as guilty.

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

- a. **Client most wants understood about childhood:** I had a wonderful family (both parents and my sister) in a difficult neighborhood. I feel bad I didn't listen more to what they tried to teach me (for example, by working in school and finishing on time). But I had many advantages other kids didn't have, and I ultimately made good use of those advantages.
- b. **Childhood assets. Regarding 10 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.** My sister is as saintly as my parents.
 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. **Good friends almost all the time.**
 - **Somewhat present in client's childhood:**
 1. **A consistently safe home life.** The family was safe, but not the neighborhood.
 2. **An overall good experience with school.** As I say, I did well in school but unwisely left school until returning later for a GED (and many classes in prison).
 3. **The feeling that I would have a good future.** The violent neighborhood we lived in made this hard to see sometimes.
 - **Missing in client's childhood:** 0.
- c. **Childhood challenges:**
 - i. **Family structure during my childhood:**
 1. Times when my father was gone. My parents separated once for about a year but then worked it out.
 2. Unsafe or unhealthy people brought into our home or family life.
 - ii. **Childhood attack or physical abuse (other than sexual):**
 1. A crime against me. All of us got robbed or roughed up a little in that neighborhood. I'd say I survived it pretty well.
 2. Violent physical punishment. By today's standards, some of our whoopings were a little over the top.
 - iii. **Childhood emotional or verbal mistreatment or abuse:**
 1. Bullied. But I think all of us had this some, and I don't feel I was scarred by this.
 2. Mistreatment based on race. Again, I survived this okay--and maybe somewhat stronger.
 - iv. **Functioning of the family during my childhood:**
 1. Times of living in an unfit home. We made it through, though.
 - v. **As a child, seeing something very upsetting or frightening:**
 1. Seeing or hearing a serious accident or injury to someone. There was a lot of violence in our neighborhood. I don't think this impacts on my cse, so let me leave it at that.
 2. Seeing or hearing someone shot.
 3. Seeing or hearing someone stabbed.
 4. Seeing or hearing someone attacked.
 5. Seeing or hearing someone beaten.
 6. Seeing or hearing a violent fight.

7. Seeing or hearing someone threatened.
 8. Seeing a dead body other than at a funeral.
- vi. **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 was a sensitive kid, and things like someone getting hurt or my dad moving out always felt like I was partly responsible for (or should be doing something about).
 2. Feeling that I was supposed to stop or fix some problem in my family. Ditto.
- vii. **Other childhood issues:**
1. Encouraged by someone to break the law or commit a crime. If having friends pushing you to use alcohol and weed fits this, then, yes, yes, yes.
 2. Alcohol use. Just the usual stuff we teens were up to.
 3. Drug use. Ditto.
- d. **Relationship with father (while growing up):** Good (2 out of 2). My dad has always been a great man--and an example to follow.
Relationship with father (today): Good (2 out of 2).
- e. **Relationship with mother (while growing up):** Good (2 out of 2). Saintly, and for the most part I tried not to disappoint her.
Relationship with mother (today): Good (2 out of 2). The same as with my dad. We would do anything for each other.
- 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:** 2 out of 10. The client answered Yes to the following standardized questions.
1. **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?**
 2. **Were your parents ever separated, apart, or divorced?**
- 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)?:** No.
14. **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.
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. At least 3 good and helpful friends I can call on anytime.
 4. Work I like.
 5. Volunteer work I like.
 6. A spiritual life I'm happy with.
 - **Somewhat present today:**
 1. Safety in all parts of my life.
 2. Good peace of mind/freedom from worry most of the time. This is a struggle--for the obvious reason that I'm in prison without having committed a crime. And with the

prospect of never being released if the truth doesn't come out.

3. A lot of purpose in my life/a feeling that my life matters to others. Not as much as if I could be released. But I actually look for purpose in my life every day.
4. A good balance between work, rest, and play.
5. Good feelings and trust for police and other authorities. There are some very good guards here (with a mix of other types). These compassionate guards give me hope that offsets my resentment about the State doing things like refusing to do the tests and comparisons that could release me.

- **Missing today:**

1. A lot of joy/happiness. I've probably become an overly serious person to deal with what's happened to me. But I try to be optimistic, if not happy.
2. Enough money/financial security.
3. A safe place to live--without fear of losing it.

b. **Client describes his/her problems in adult life:** This case. Period.

Part D: Addictive Patterns

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

- a. **Significant responses regarding use of alcohol:** None.
- b. **Last used alcohol:** More than 10 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. Just marijuana, and not for many years.
- b. **Particular drugs used:**
 1. Marijuana/pot (0 times in the last 12 months).
- c. **Reflections on drug use:** I have no problem with alcohol or drugs.
- d. **Client's belief about having a problem with drugs:** No.
- e. **Any connection between drugs and legal problems (including this case)?:** No.

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

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

Part E: Personal Functioning

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

- I. **Past suicide attempts:** No.
- II. **The client's responses don't include indications of the following in the last 12 months:**
 - a. **Thoughts of hurting myself** (0 out of 9).
 - b. **Thoughts of hurting others** (0 out of 8).
 - c. **More anger than most people seem to have** (0 out of 9).
 - d. **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. **Depression** (7 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. A lot more trouble getting to sleep.
5. A lot of trouble staying asleep.
6. Unusual fatigue (tired much more than usual).
7. Problems concentrating or being easily distracted.

Client's reflections on these 7 responses: This is all related to my conviction and incarceration for something I didn't have any part in.

b. Other mood or functioning issue:

1. **Being more worried and nervous than other people.** But I think this is an understandable level of worry—basically wondering if I will have a life on the outside.

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?:** Yes. For a while in prison, but the doctor and I didn't see any improvement, so we stopped it.
- d. **Prior counseling/therapy?:** No.
- e. **Participation in recovery or survivor groups?:** Yes. It's not a typical "recovery group," but our "Excellence Cell" is a tremendously valuable part of my life. I see at least some of these men daily, and we're always encouraging each other and trading ideas on classes, programs, volunteer opportunities, etc. I don't have an addiction or other reason to use the usual recovery groups (which, by the way, are constantly starting and disbanding here). But I think our "Excellence Cell" helps me as much as any group could.

And I hope I always know these men.

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 family, friends, prison volunteers I've been lucky to meet, some of the caring staff members, and (most recently) the hope the truth might come out in my case.
- b. **Hardest or most challenging things in client's life today:** Prison and the occasional bouts of depression over what I'm missing. I've always wanted to start a family. I've wanted to help my parents. I've wanted to be a good uncle to my sister's three children. And to give back to a community larger than the one I'm living in.

But I try to meet this challenge by being meaningful here, and so far I've succeeded at that.

- c. **Worst events during incarceration:** This is hard to answer, and I will need to think about it.

I've seen people stabbed, badly beaten, and mistreated in ways most people will never know. And seeing men lose hope is maybe the most painful, and it's something I fear for myself. There are many men here who, as one expression has it, "are about nothing."

As I say, this is a hard question to answer, and if it's important, maybe we can talk about it later.

- d. **Spiritual or religious aspects of client's life:** I ask that you keep this confidential, as it is not a popular point of view. I completely respect others' spiritual and religious lives IF that orientation helps them to live better. But I lean heavily in the direction of atheism. I believe we need to find our way without a supervising God to good and honest living. In the past several years, I've read a lot from Christopher Hitchens, Richard Dawkins, Sam Harris, Ayaan Hirsi Ali, and others about this and have been inspired to see how many fantastically ethical people have given up the idea of God.

I consider myself quite spiritual, and I meditate almost every day, sometimes several times a day.

- e. **Jobs and job training while incarcerated:** I've done many jobs (and always liked being useful).

Roughly in order, I've worked in cleaning, food service, furniture repairs, tutoring GED class inmates, and now firefighting. I think I only once received anything less than the highest evaluation ("Superior"), and the was from the furniture repair supervisor who was upset I was leaving to do tutoring.

- f. **Classes/education while incarcerated:** I can provide a list separately. There have been many, over 50.
- g. **Counseling, drug/alcohol recovery fellowship, religious groups, and other personal growth while incarcerated:** As I said before, I don't really use these (and they aren't regularly and reliably available here). I use my "Excellence Cell" group constantly, and I'm always involved in classes, programs, firefighting work, and volunteering.
- h. **Other measures at self-improvement during incarceration:** I've earned over 200 certificates and commendations I can share. These tell my prison story fairly well.
- i. **Rules/conduct violations during this incarceration:** I've had only one charge. June 5, 2019; being AFC ("absent from count"). I was actually at a special firefighter meeting, which was mandatory. I was found Not guilty.
- j. **Assistance to the institution/facility during incarceration:** I can provide a list separately, along with the dozens of commendations I've been given.
- k. **Living arrangement plans:** Initially, likely with my sister, her husband, and their children. They would not charge me, but I would insist on getting a job and contributing as soon as possible.
- l. **Work plans:** I would work anywhere. I have no doubt I could find work within a couple days of my release.
- m. **Other release resources:** I'm not sure. If people think I could use some counseling to adjust to my release (or for any other reason), I would follow that advice.
- n. **Special upcoming opportunities or circumstances:** My parents are elderly and haven't been well or settled since my arrest. I'd certainly like to help them.
- o. **Client plans for more steps supporting release:** I don't think there's more I could do, but I'm open to any suggestions.
- p. **Other important information about the relief sought:** I think every staff member who really knows me thinks highly of me--and probably doubts my guilt. For whatever that's worth.

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

- a. **Wish for changes in the following areas:**
 - 1. **Relationships.** I'd like upon my release to be able to reconnect with many of the good people who tried to help me--and ones I'd like help. My family and close friends are committed to me (and vice versa), but I could offer a lot more to them once released.
 - 2. **Work/work skills.** I am always eagerly open to learning new job skills.
 - 3. **Counseling.** As I said, I would follow any responsible suggestion to get help to adjust to life on the outside--or in any challenges I face.
 - 4. **Other changes.** I would like to be able to forgive the people who've done this to me. But I feel that must await their honesty in facing the fact of my innocence.
- b. **Client goals:** To be as much help as I can be to society, whether in here or after release. To be a good and contributing son, brother, and uncle. To maybe start a family one day.
- c. **Specific things client thinks a judge would like to see 4 months from now:** To be honest, a judge who knew the facts of my case and my life would likely agree with the staff members here at the ISP saying they hope I can keep my head up and keep living the life of integrity I've chosen.
- d. **Something good the client can imagine coming from current challenges:** Yes, always. I don't have a clear vision of this, but I can imagine this.

Notes:

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

- a. **Best accomplishments:** I've been a skilled and honest worker who always gave his employer more than a full day's work. I've been a good son, brother, and uncle. I've been a good and encouraging friend to the members of our "Excellence Cell," and at every chance I've encouraged new inmates and young ones to choose the most responsible path possible. I've done good for people in need wherever I've encountered them. As my last counselor used to say, "I'd sure like to see you out, but this place won't be the same when you're gone."
- b. **Personal strengths:** Honesty, dedication to any task I commit to, consideration of others (often before myself), the willingness to learn new skills and put them into practice, living an example that might inspire others.
- c. **People client is currently helping (or who currently rely on client):** My family, my friends in the "Excellence Cell," and I'd like to think many others, both in and out of prison.
- d. **Other people client has helped:** Fixing up my parents' home, helping my sister's family with their home, being an example here at the prison, offering emergency revival help on at least 4 occasions here at the Prison (and probably saving those lives), trying to make every situation better.
- e. **Client's Index of Supporters:**

1. Leonard and Sarah Anderson.:

- a. **Relation to client:** My parents.
- b. **Trustworthiness:** These are two of the most decent people in the world. They have been good to each other, to my sister and me, to neighbors and the neighborhood.
- c. **Contact information:** 6866 S. Lake Dr., Chicago, Illinois. 312-905-3822; LeoSarah0707@gmail.com.
- d. **Specific help:** They have been the picture of love and steady support toward me. I'd be allowed to live with them (as one of my housing prospects). They can attest to my good character and credibility, my ability to succeed on release, and my caring character.

2. Pierre and Sandra Smith:

- a. **Relation to client:** Cousins.
- b. **Trustworthiness:** Pierre and Sandra are hard-working, honest members of their community. Pierre is a longtime dispatcher for Marcus Trucking. Sandra is a well-regarded HR director for the Parish Community Schools. Both would support me with positive comments about my character and "making lemonade out of lemons, and strong likelihood of success upon release. They would offer me any assistance I needed after release.
- c. **Contact information:** SandraPierre91@gmail.com; 312-908-9923.
- d. **Specific help:** They would speak completely favorably about me and my prospects for success upon release. And of course, they were solid alibi witnesses never called at my trial.

3. Tanisha Sanders:

- a. **Relation to client:** Sister.
- b. **Trustworthiness:** Tanisha is an accomplished medical device technician with Zimmer Biomet in Warsaw, Indiana. She and her husband (John) have worked at Zimmer for over 15 years. They have 3 beautiful children and are valued members of their community in every way.
- c. **Contact information:** 574-900-1299; TanishaSanders9@aol.com.
- d. **Specific help:** Both Tanisha and John think the world of me and would be of any help they can. They've built a large new home outside of Warsaw and talk hopefully of my coming to live with them as I adjust out of prison life.

4. Nate and Louise Cross:

- a. **Relation to client:** The Crosses are old and dear friends. I met Nate when we worked at Bethlehem steel in our teens. He was my first close white friend and has stayed in touch with me over the years, including during my years locked up.
- b. **Trustworthiness:** Nate is a respected CPA in Cincinnati and Indianapolis. He was one of the original founders of his firm that now employs (I believe) over 50 people. He's a leader in his field and in his religious community.
- c. **Contact information:** 800-904-7171; Nate.Cross@torcnet.com.

d. **Specific help:** Nate can speak to my character and work ethic. We speak every other week and trade letters at least monthly.

5. **Otto Crandall:**

- a. **Relation to client:** Mentor and football coach.
- b. **Trustworthiness:** Coach Crandall was a fixture at any high school and stayed in touch with me even after (over his objections) I quit high school. He has encouraged thousands of kids from our neighborhood.
- c. **Contact information:** 312-455-9333; 8918 S. Calumet Dr., Chicago, Illinois 60619.
- d. **Specific help:** Coach Crandall believes in me completely. He is older and can't offer anything tangible, but his wisdom is priceless to me. It's an honor that he stays in touch with me.

6. **Elizabeth Payne:**

- a. **Relation to client:** Former girlfriend, now a platonic friend of almost 20 years.
- b. **Trustworthiness:** Elizabeth is the principal of the Burnside Academy, an elementary school on the south side of Chicago. She is a leader in scholastic excellence for underprivileged kids and especially in school-parent partnerships.
- c. **Contact information:** 312-800-2395; 9014 S. Indiana Ave., Chicago, IL 60619.
- d. **Specific help:** Elizabeth will never stop talking about my character and how I have continued to do my best in these difficult circumstances.

7. **Tom and Marcia Jenkins :**

- a. **Relation to client:** Volunteers at the prison on a number of programs ("The 7 Habits of Highly Effective Inmates"; "Hustling While We Wait (HW3): How Every Minute Counts Wherever You Are"; "Literature for Prisoners"; and others).
- b. **Trustworthiness:** Mr. and Mrs. Jenkins are some of the finest people I know. They are quietly proud atheists but extremely respectful of all people. They are accomplished teachers in their professional lives and some of the most caring people I've ever met. They worked to try to get Zoom classes installed during Covid and even offered to pay for some computers and large-size screens. Sadly, the bureaucracy won out.
- c. **Contact information:** We're not allowed to have the contact information for volunteers. If you accept my case, I can ask them to be in touch with you. I'm sure they'd be glad to.
- d. **Specific help:** I'd summarize it by quoting some of their favorite (and often-repeated) statements to me.

"There's not a class we lead that isn't better for you being in it."

"We want you to teach classes with us when you're released."

"If we were religious, we'd want you canonized."

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

New thoughts

Any new thoughts as a result of using this Defense Map?: Yes. If not a new thought, then at least some new hope.

Final information/thoughts client wishes to share: Just that I'm deeply grateful for your taking a look at my situation. Words don't seem like enough. But I'm deeply, deeply grateful.

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