

IN THE SUPREME COURT OF PENNSYLVANIA
WESTERN DISTRICT

WAP 2024

NO. 3

COMMONWEALTH OF PENNSYLVANIA

V.

DEREK LEE,
Appellant

BRIEF FOR *AMICUS CURIAE*
DEFENDER ASSOCIATION OF PHILADELPHIA
ON BEHALF OF DEREK LEE

Appeal from the Superior Court decision at 1008 WDA
2021 of June 13, 2023 which affirmed the December 19, 2016
Judgment of Sentence in the Court of Common Pleas, Alle-
gheny County, Docket CP-02-CR-0016878-2014.

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- Rachel Lopez, Terrell Carter & Kempis Songster, *Redeeming Justice*, 116 *NW. U. L. REV.* 2 (2021).....29
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I. INTEREST OF THE AMICUS CURIAE

The Defender Association of Philadelphia (“Defender”), a nonprofit organization which represents the majority of indigent defendants in the City of Philadelphia, offers a unique perspective in terms of Appellant’s challenge to the constitutionality of imposing a mandatory life-without-parole sentence to someone convicted of second-degree murder who has diminished culpability. Through our work representing juvenile lifers who were resentenced and paroled following *Miller v. Alabama*, 567 U.S. 460 (2012) and *Montgomery v. Louisiana*, 577 U.S. 190 (2016), we saw the cruelty of imposing life without parole for those whose youth made them less culpable for their crimes. We also witnessed the positive boon former lifers offered to their communities once they were released.

After the United States Supreme Court ruled, in 2012, that it was unconstitutional to sentence youth to mandatory life without parole and, in 2016, that ruling was applied retroactively, the more than 500 individuals serving juvenile life without parole in Pennsylvania became entitled to a new sentencing hearing. Philadelphia had the single largest

group of children (approximately 325) serving mandatory life without parole of any city in the nation. The Defender devised a three-year plan, worked side by side with court administration, City Council members, the District Attorney's Office and numerous legal organizations and private firms across the region. The Defender represented 75 percent of Philadelphia's cases and trained and supported *pro bono* counsel to handle the remaining 25 percent. Across the Commonwealth to date, 497 former children sentenced to mandatory life without parole have been resentenced, with 303 released.

In addition to representing a substantial percentage of indigent defendants in Philadelphia at trial and on appeal, the Defender Association's policy team leads efforts to reform the criminal justice system through systemic policy changes that support fair outcomes for clients, stronger, safer neighborhoods, and rights guaranteed by the Constitution. The Defender also supports participatory defense hubs and works with grassroots organizations.

II. ARGUMENT

If one reviews the patterns associated with those sentenced to felony murder in Philadelphia, it becomes clear that it is excessively cruel for someone who did not kill nor intend to kill to receive a mandatory sentence of life without parole (LWOP). The Defender offers a unique perspective in terms of Derek Lee's challenge. Through our work representing 212 juvenile lifers, who were resentenced and paroled following *Miller v. Alabama*, 567 U.S. 460 (2012) and *Montgomery v. Louisiana*, 577 U.S. 190 (2016), we are keenly aware of the effect of LWOP on those with diminished culpability and the positive impact paroled lifers have in the larger community, once released.

As of 2020, there were 1,231 individuals incarcerated for felony-murder in Pennsylvania, and 579 of the cases (47%) originated in Philadelphia.¹ More than half of those serving were over the age of 50.

¹ A dataset of everybody in Pennsylvania Department of Corrections' custody, as of April 6, 2020, was obtained via the Abolitionist Law Center. We then narrowed the list to those convicted of second-degree murder from Philadelphia. *See* Exhibit I.

Murder of the second degree in Pennsylvania is a criminal homicide committed while the defendant is engaged as a principal or an accomplice in the perpetration of a felony. 18 Pa.C.S. § 2502(b). It is also known as felony-murder. The sentence for murder of the second degree is mandatory life imprisonment. 18 Pa.C.S. §1102(b).

More than four-fifths were incarcerated before they turned 30. Most had been prosecuted during the 1980s and 1990s, a period of particularly high incarceration rates. Barring commutation, all were sentenced to die in prison “for something they did on their worst day,” as victims’ rights advocate Dorothy Johnson-Speight put it. Exhibit A at 2. Even though evolving standards of decency around punishment for those who did not themselves kill have evolved, the aging population of lifers who have been rehabilitated while behind bars have no hope of mercy absent this appeal.

The Defender Association presents affidavits from Dr. Johnson-Speight, along with four former juvenile lifers,² a man sentenced to LWOP for felony-murder whose sentence was later commuted,³ and two family members of individuals sentenced to life for second-degree murder.⁴ These individuals shed light on the circumstances surrounding

² Steve Austin (Exhibit B), Tamika Bell (Exhibit C), John Pace (Exhibit D), and Stacey Torrance (Exhibit E).

³ Tyrone Werts (Exhibit F).

⁴ Brenda Harris (Exhibit G) and Martha Williams (Exhibit H).

a life sentence and the profound transformation that can occur after years behind bars.⁵

A. Many Of The Philadelphians Serving Life Without Parole For Felony-Murder Might Receive Different Results If Prosecuted Today.

Everyone found guilty of felony murder in Pennsylvania must die in prison unless they are one of the few to be granted clemency.⁶ Over the years, Pennsylvania’s population of lifers has grown increasingly geriatric. The majority of those in the dataset we reviewed (*see* footnote 1) were incarcerated when they were youthful. The majority were aggressively prosecuted during the 1980s and 1990s, when public views around punishment were harsher (it was the era highlighted by the false fear of the “super predators”). Many had court-appointed lawyers who

⁵ Kavita Goyal, former associate director of policy, was instrumental in obtaining these affidavits. We also received assistance from Ayesha Qureshi, Data Analyst, William Barta, Data Analyst, Katherine Parker, Director of Policy, Helen Levin, Co-Chief of Juvenile Life Without Parole Unit, and Mitchell Atkins, legal intern.

⁶ Since the 1980s, Pennsylvania governors rarely grant clemency, though the numbers increased somewhat under Governor Tom Wolf. Pa. Board of Pardons, Commutation of Life Sentences (Dec. 4, 2023), <https://www.bop.pa.gov/Statistics/Pages/Commutation-of-Life-Sentences.aspx>.

were paid low rates, which incentivized them to obtain quick results rather than adequately prepare, investigate, or negotiate the cases.⁷

Because standards of decency have evolved, it is likely that a number of those serving life for felony-murder would not be serving LWOP if they were prosecuted today. That is why Appellant's challenge is both legally and morally justified. Applying the Pennsylvania Constitution's prohibition against cruel punishment can allow a measure of mercy that deserving inmates would otherwise not receive.

1) Most felony-murder cases originate from Philadelphia and inmates are overwhelmingly Black.

The Defender Association reviewed all currently incarcerated individuals serving time for felony-murder whose crimes occurred in Philadelphia County as of 2020. There were 1,231 individuals

⁷ James M. Anderson & Paul Heaton, *How Much Difference Does the Lawyer Make? The Effect of Defense Counsel on Murder Case Outcomes*, 122 YALE L.J. (2012), at 164. Available at <https://digitalcommons.law.yale.edu/ylj/vol122/iss1/3/>. The authors point out, "Philadelphia's fee schedules have been criticized for creating perverse incentives. Counsel has no financial incentive to prepare for trial because there is a flat rate for preparation time. In addition, counsel may have an incentive to take a case to trial so that she can make as much in five days of trial as for the entire preparation period.... '[This] increases the risk of ineffective assistance of counsel by maintaining a compensation system which punishes counsel for handling these cases correctly and rewards them only if they take every case to trial without adequate preparation or the exploration of appropriate non-trial options.'"

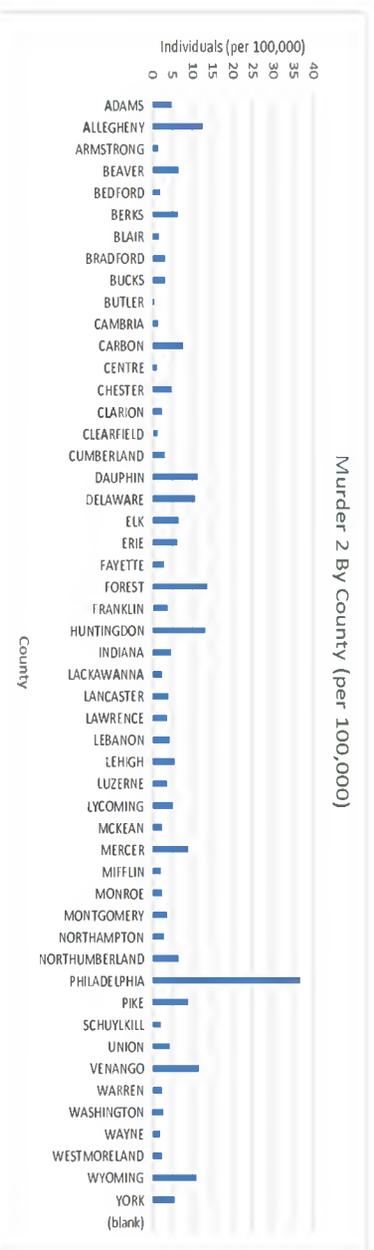
incarcerated for felony degree murder in Pennsylvania, and 579 of the cases (47%) originated in Philadelphia.

Illustration 1. Second-Degree Murder Inmates By Originating County



Philadelphia is the most populous County in Pennsylvania. Even after weighing population and “normalizing” the data across counties, Philadelphia’s contribution to the felony-murder prison population is still significantly higher than any other county.

Illustration 2. Felony-Murder Population by County (per 100,000)



The DOC classifies inmates by race but not ethnicity. More than 85 percent of all individuals serving time for felony-murder in cases originating from Philadelphia are Black.

Table 1. Felony-Murder Population By Race

Race	Count of Individuals	Percentage of Total
ASIAN	7	1.21%
BLACK	497	85.84%
HISPANIC	42	7.25%
OTHER	1	0.17%
WHITE	32	5.53%
Grand Total	579	100.00%

2) The vast majority of felony-murder inmates were youthful when they committed their crimes.

Based on commitment dates, the majority (60%) of Philadelphians sentenced to felony-murder committed their crimes when they were under the age of 25.⁸ Nearly a third were between the ages of 18 and 21

⁸ Philadelphia Lawyers for Social Equity published a report that extensively analyzes age data for those incarcerated for second-degree murder statewide. PLSE, *Life Without Parole for Second-Degree Murder in Pennsylvania: An Objective Assessment of Race* (2021). Available at <https://www.plsephilly.org/wp-content/uploads/2021/01/PLSE-Second-Degree-Murder-Audit-Jan-19-2021.pdf>.

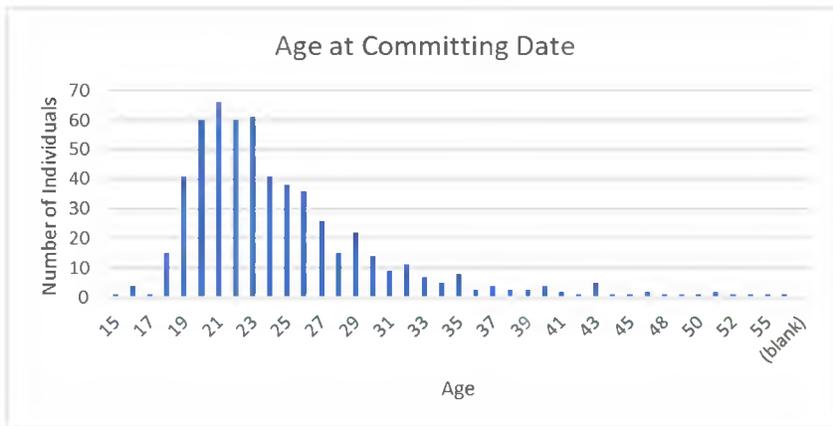
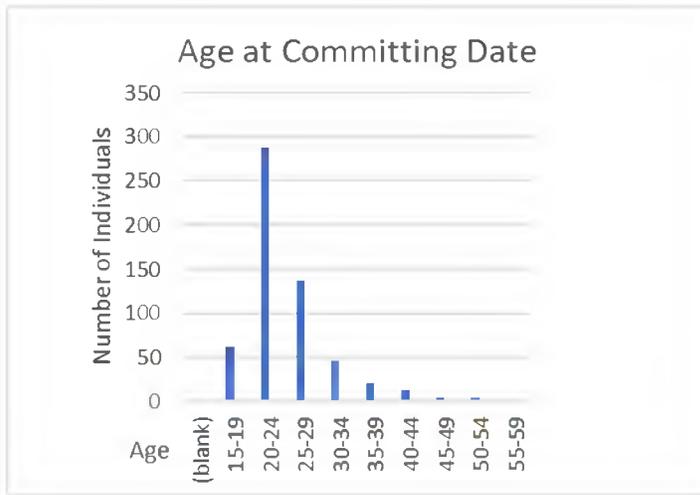
when committed. About 85% of those committed to LWOP were under the age of 30.

Table 2. Age When Committed.

Age	Count of Individuals	% of Total
15-19	62	10.71%
20-24	288	49.74%
25-29	137	23.66%
30-34	46	7.94%
35-39	21	3.63%
40-44	13	2.25%
45-49	5	0.86%
50-54	5	0.86%
55-59	2	0.35%
Total	579	100.00%

A more granular look at age at committing date is provided below.

Illustrations 3 and 4. Age When Committed.



The youthfulness of the offenders is consistent with what courts around the country have concluded about adolescent brain development. In *Miller*, 567 U.S. at 472, the Court noted that developments in psychology and brain science show “fundamental differences” between juvenile and adult minds. “Transient rashness, proclivity for risk, and inability to assess consequences” both lessened a child’s moral culpability

and enhanced the prospect that, as the years go by and neurological development occur, “his deficiencies will be reformed.” *See Roper v. Simmons*, 543 U.S. 551, 570 (2005).

Both *Roper* and *Graham v. Florida*, 560 U.S. 48 (2010), emphasized that the distinctive attributes of youth diminish the penological justifications for imposing the harshest sentences, even when they commit terrible crimes. That is because “the heart of the retribution rationale” relates to an offender’s blameworthiness. *Graham*, 560 U.S. at 71. Similarly, incapacitation did not support the life-without-parole sentence in *Graham*, because deciding that a “juvenile offender forever will be a danger to society” would require making a judgment that he is incorrigible -- but “incorrigibility is inconsistent with youth.” *Id.* at 72-73. For the same reason, rehabilitation could not justify that sentence as life without parole “forswears altogether the rehabilitative ideal.” *Graham*, 560 U.S., at 74. In fact, life without parole reflects “an irrevocable judgment about [an offender’s] value and place in society,” at odds with the capacity for change. *Id.*

Other jurisdictions have considered expanding the rationale of *Montgomery*, *Miller*, *Graham*, and *Roper* to youthful individuals who are over the age of 18. See *Matter of Monschke*, 197 Wash. 2d 305 (Wash., 2021) (state constitutional provision prohibiting cruel punishment prohibited mandatory life sentences for 19-year-old and 20-year-old convicted of aggravated murder, and thus the offenders were entitled to new sentencing hearing at which trial court would have to consider whether each offender was subject to mitigating qualities of youth). Most of those serving LWOP for felony-murder were youthful at the time of their offense.⁹

Former lifers say that the people they were when they when they went to prison vastly differs from the people they became. Stories from Steve Austin, Tamika Bell, John Pace, and Stacey Torrance (*see* attached affidavits B, C, D, and E) emphasize how immature they were when they committed their crimes. They freely confessed, believing the police would

⁹ In *Commonwealth v. Lee*, 206 A.3d 1 (Pa. Super., 2019), an *en banc* panel of the Superior Court rejected extending *Miller*, *Graham* and *Roper* to those under the age of 25.

send them home after they told the truth.¹⁰ They had no concept of what a life sentence really meant, and many were misinformed by their lawyer.¹¹ Although they were children when they got on that bus to go

¹⁰ Tamika Bell (Exhibit C at 3):

I told my mom that I went to rob the people, but I didn't know they were going to shoot anyone. She said, let's go down to the station and tell the police the truth. My mom and I prayed together. I thought I was going to go down and tell them what happened and then I was going to go home. None of us had any interactions with the police before. They weren't looking for me.

Steve Austin (Exhibit B at 4):

The police picked me up while I was just walking down the street. They took a statement from me about what happened. I knew I killed a man. There was nothing for me to confess to, and I told the truth about what happened. I didn't know the law. I just told the truth about what I did.

Stacey Torrance (Exhibit E at 3):

They handcuffed me to the chair. They started threatening me. "We know you know what happened," they told me. I was back there for a while, and my mother started asking what was going on. They told my mother that I implicated myself in the crime. She said, "I want an attorney." They said, "There are no attorneys here. If he signs this statement, he can go home." I was 14 years old. I had no run-ins with the law. She just wanted me to come home. So, I signed the statement, and I got arrested. They took the statement from me without a parent, guardian, or attorney. That's how I implicated myself in the crime.

¹¹ John Pace (Exhibit D at 6):

I barely saw the (court appointed) lawyer. The only time I saw her was when I was in court, and she never came to see me. As a young person, I was still in denial that this was happening to me.

She kept telling me to plead guilty to second degree, but there was no offer. The lawyer told my mother that if I pleaded guilty for felony-murder, I would only be in for 10 to 15 years. I had remorse. I was ready to plead guilty....

It all happened in one day. There was a decertification hearing. My lawyer argued decertification. The only evidence that she presented to the judge was what I had told her, which was basically how I was doing in school at the Youth Studies Center....

The judge denied decertification. I pleaded guilty to second degree... The judge kept asking me if I understood. I said I did, but I didn't. I told one of the guards at

upstate, they had to grow up quickly to survive. Stacey Torrance (Exhibit E at 4-5) describes it most compellingly:

After I got convicted, I automatically got life without parole. The next day, I was on a bus to Graterford. When I got on the bus, the sheriffs on the bus were taken aback because of my age. They were in disbelief.... I became a man on my bus ride to Graterford. I knew I couldn't go in with a 14-year-old mentality. I was just turning 15. I knew I couldn't go in acting like a 15-year-old child. I had to become a man almost overnight. A big part of me changed. I had to kill a part of myself in order to survive. I had to get rid of that child.

One third of Philadelphians serving time for felony-murder were 21 or younger and share with children the “distinctive attributes of youth.” Surely, there are some among the 85 percent who were under 30 at the time of their commitments who are worthy of the rehabilitative ideal.

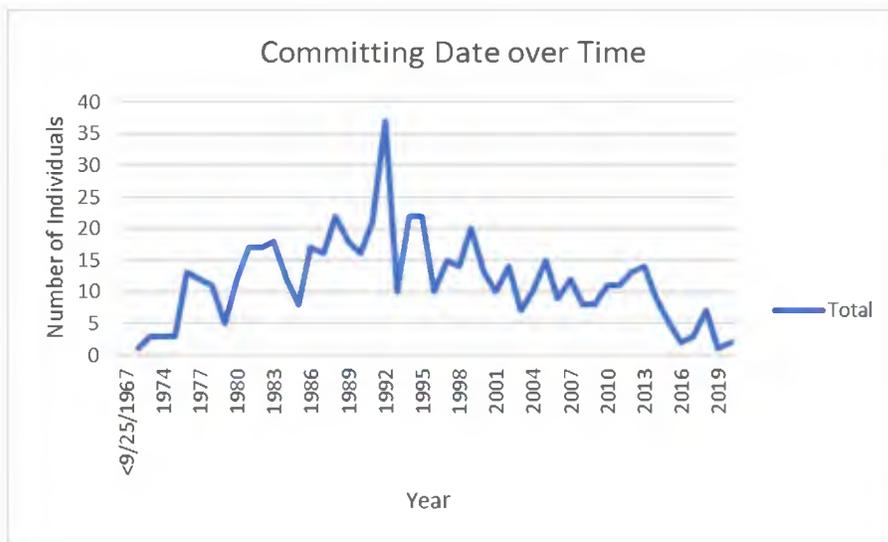
3) Most felony-murder inmates were prosecuted during the 1980s and 1990s, a period with high incarceration rates.

Those who participated in felonies in which someone was killed were aggressively prosecuted during a period when tough-on-crime

the Youth Studies Center that I'd pled guilty to felony-murder. He said, “No! That's a life sentence!” I told him, “That's not what my lawyer said.” I didn't understand that a life sentence means a life sentence in Pennsylvania.

policies led to high incarceration rates. *See The Sentencing Project, No Exit: The Expanding Use of Life Sentences in America* (2009).¹² Looking at the DOC dataset (Exhibit I), we found that second-degree murder convictions occurred most frequently in 1980s and 1990s and have been dropping since.

Illustration 5. Second-Degree Murder Commitments Over Time.



Incarceration for second-degree murder peaked in 1992, with 37 individuals from Philadelphia committed to prison that year for the charge. In 2020, only 2 individuals were committed to prison for second-

¹² Available at https://www.sentencingproject.org/app/uploads/2023/01/inc_NoExitSept2009.pdf.

degree murder. Around 60 percent of those serving sentences for felony-murder were committed during the 1980s and 1990s.

These trends correspond with national rates of incarceration,¹³ as well as aggressive prosecution in the City of Philadelphia during the 1980s and 1990s. Pennsylvania has the third-largest number of people serving LWOP in the U.S., after Florida and Louisiana. The Sentencing Project, *Still Life: America's Increasing Use of Life and Long-term Sentences* (2017).¹⁴ Not only have prosecutors routinely sought life in murder cases, they have often sought death. During District Attorney Lynne Abraham's tenure, for instance, she pursued the death penalty more than any other prosecutor in the United States. Tina Rosenberg, *The Deadliest D.A.* NEW YORK TIMES MAGAZINE (July 16, 1995).¹⁵ Prosecutors, at least initially, sought the death penalty for both Tamika Bell and Steve Austin, despite the fact they were children.

¹³ See The Sentencing Project, *No Exit*, *supra*, at 4.

¹⁴ Available at <https://www.sentencingproject.org/reports/still-life-americas-increasing-use-of-life-and-long-term-sentences/>.

¹⁵ Available at <https://www.nytimes.com/1995/07/16/magazine/the-deadliest-da.html>.

Aggressive prosecution, along with perverse financial incentives that encouraged court-appointed lawyers to take cases to trial with scant preparation,¹⁶ have made it difficult for many second-degree murder defendants to receive less than life. *See* Anderson & Heaton, *supra*; *Commonwealth v. McGarrell*, 87 A.3d 809, 811 n.3 (Pa. 2014) (Saylor, J., dissenting) (“State-level funding for indigent defense services—presently lacking in Pennsylvania and only one other state in the nation—is at the core of nearly every reform recommendation.”).

In Pennsylvania, there are death row prisoners who were sentenced to death in Philadelphia in the 1980s and 1990s when 80% of capital cases were handled by court-appointed lawyers who received a flat fee of \$1,700, plus \$400 for each day in court. Bryan A. Stevenson, *Statement Before the United States Senate Judiciary Committee Subcommittee on the Constitution* (April 8, 2008). *See also* Joint State Government

¹⁶ The Defender did not begin accepting capital representations until 1993.

Commission (JSGC), *Capital Punishment in Pennsylvania: The Report of the Task Force and Advisory Committee* (June 2018).¹⁷

The lack of resources for court-appointed counsel, and the fact that counsel got paid more for going to trial than for working out a deal, affected the ability of court-appointed counsel to adequately prepare, present mitigation, and develop a trusting relationship with clients. *See* Anderson & Heaton; JSGC. Most of those we spoke with received poor representation.

Stacey Torrance (Exhibit E, at 3) recalled:

At my arraignment, they appointed me an attorney. I met him during the arraignment. He visited me once when I was awaiting trial—that was it. I had no further interactions with him. I had hardly any interactions with him. The only time I would see him is when I made a court appearance.

Steve Austin (Exhibit B at 6-7) remembers that the judge in his case seemed concerned about his representation:

The judge actually tried to help me. I remember that the judge asked my attorney about the juvenile cases of the day, which were cases about juvenile confessions. They got into a back and forth about making statements. He asked my attorney if

¹⁷ Available at [http://jsg.legis.state.pa.us/resources/documents/ftp/publications/2018-06-25%20SR6%20\(Capital%20Punishment%20in%20PA\)%20FINAL%20REPORT%20June%2025%202018.pdf](http://jsg.legis.state.pa.us/resources/documents/ftp/publications/2018-06-25%20SR6%20(Capital%20Punishment%20in%20PA)%20FINAL%20REPORT%20June%2025%202018.pdf).

he knew about certain cases about that. My attorney clearly wasn't familiar with seminal juvenile case law.

The judge started talking directly to me. He told me to stand up. He said to me, "Mr. Austin, if you want another attorney, you are entitled to that." My attorney got flapping mad. He asked the judge what he was doing and asked for a sidebar. He didn't say why, but I thought that was ominous. But the judge continued to talk. "if you'd like to have another attorney, you're entitled," he said...

In retrospect, I realize the judge was trying to help me. He was seeing a kid who didn't have a record and knew that something else should be happening instead of a death penalty case. But at that time, I didn't know. I was 16. I couldn't tell who was for me and who was against me.

Defendants are entitled to post-conviction relief to challenge the effectiveness of their counsel. However, such claims are difficult to prove as the prisoner must show both that counsel's representation fell below the standard of care of a professionally reasonable attorney, and that there is a reasonable likelihood of a different outcome but for counsel's deficient performance. *Strickland v. Washington*, 466 U.S. 668, 684, 691 (1984); *Commonwealth v. Pierce*, 527 A.2d 973, 974-76 (Pa. 1987). Since 1996, in order to obtain federal habeas relief, a petitioner must also show that a state court denial of such a claim was objectively unreasonable. 28 U.S.C. § 2254(d).

Tyrone Werts, who was sentenced to LWOP for felony murder (though he was sitting outside in the back seat of the car during the robbery where someone died) suffered ineffective assistance of counsel and prosecutorial misconduct during his trial. However, his conviction survived. In his dissent to the opinion denying *habeas* relief, Third Circuit Judge Theodore McKee wrote, “Given the nature and frequency of the transgressions that occurred during this trial I am concerned that one reading the majority opinion may conclude that we simply put on blinders, ignored the dictates of fundamental fairness ..., got out a rubber stamp, and stamped this conviction and the denial of Werts’ petition, ‘affirmed.’” *Werts v. Vaughn*, 228 F.3d 178, 224 (3rd Cir., 2000) (*McKee, J.*, dissenting).

Thus, in Pennsylvania we have an aging population of mostly Black inmates, many of whom were sentenced during a time of aggressive prosecution, had inadequate counsel, and were very young at the time of their offense. These individuals cannot challenge their sentences. Though many likely would be good candidates for parole, they will be unequivocally denied parole by law.

B. Because A Felony-Murder Conviction Compels A Sentence Of Life Without Parole, A Court Can Never Consider Mitigation Or The Defendant's Role In The Crime, And There Is No Way To Revisit Such Issues, Even For Those Who Have Undergone Significant Transformation.

When juvenile lifers were sentenced decades ago, there was no basis for a court to consider mitigation. LWOP is a mandatory sentence in Pennsylvania for all first- and second-degree murders. Even if a judge, or jury,¹⁸ believes a defendant does not deserve life with no possibility of parole, there is no discretion or individualized sentencing possible under the law.

Juvenile lifers were granted a reprieve because of *Miller* and *Montgomery*, and, in Pennsylvania, 497 juvenile lifers have been resentenced at hearings where they have been able to present mitigation and evidence of their rehabilitation. Very few (just over 1 percent) received a sentence of LWOP after resentencing when the sentencing

¹⁸ Most jurors do not understand that a life sentence means *no parole*. JSGC Report, *supra*, at 149. In death penalty cases, “almost 75% of the jurors estimated that life-sentenced prisoners would be paroled or otherwise released” and that “the median estimate for how long someone usually spends in prison if they don’t get death” varied from fifteen to twenty-five years. *Id.* at 149-50.

court had discretion to give something less. But those who were 18 and older at the time of their crimes will never have the opportunity to present mitigating circumstances nor evidence of their reform and rehabilitation while incarcerated.

1) Because LWOP is mandatory for felony-murder, there can be no individualized sentencing.

Unlike in most other states, Pennsylvania law does not distinguish between the principal or an accessory; nor may a judge or jury consider the circumstances or context of the crime. *See* PLSE, *supra*, at 5. So, for Tyrone Werts, it did not matter that he did not participate in the robbery that led to a murder, but merely waited in the car.¹⁹ At the time he was sentenced, it did not matter that Stacey Torrance's role in the robbery ended hours before the murder took place, long after he went home.²⁰ It

¹⁹ Tyrone Werts (Exhibit F at 2):

I said I didn't want to be involved in it and stayed in the car. I wasn't the lookout or the getaway driver, but I stayed in the car in the backseat. I distanced myself from it.

²⁰ Stacey Torrance (Exhibit E at 2):

My cousin wanted to rob the family and wanted me to set up a drug deal with the man who ended up being the victim of the crime. After I set up the drug deal, my cousin actually took me home. My cousin and the 2 other co-defendants who I didn't even know murdered the victim that I had brought to them. I didn't know the murder was going to take place.

did not matter that John Pace was highly intoxicated at the time of the robbery he committed, which eventually led to a man's death.²¹ It did not matter that Tamika Bell was the victim of trauma when she was a child after being raped repeatedly by her mother's boyfriend.²²

Pennsylvania is a national exception in its use of life without parole as a sentence for crime, and more particularly, in its statutory framework mandating that sentence for second-degree murder. PLSE, *supra*, at 43.²³ For much of the second-degree population, the convictions mark the

²¹ John Pace (Exhibit D at 4):

I remember that particular night. I was at my friend's house, and it was late at night, around 2 or 3 in the morning. I had been smoking and drinking all day, and I also had valiums in my system. On the way home, I encountered an older gentleman. It was part of the pattern—to think you can get away with things—and so I attempted to rob him. ... I was so high that when a police officer came up to me, I didn't run. I just stood there. He arrested me.

²² Tamika Bell (Exhibit C at 1-2):

Me and my mom didn't have a good relationship because her prior boyfriend was raping me. When I turned 14, she caught him on me. She put him out. She asked me about it, and I said he did this all the time. That ruined our relationship. Then I started going out and doing drugs, drinking, and hanging out with people much older than I was.

²³ Like other states, Pennsylvania sustained a dramatic increase in its prison population beginning in the 1970s and 1980s. Meanwhile, it saw a disproportionate increase in people serving life in prison without the possibility of parole. The lifer population grew from 449 in 1967, to 2,275 in 1991, to 5,346 in 2017. Lifers now account for roughly 10 percent of Pennsylvania's prison population, the highest rate in the country. Philadelphia has contributed disproportionately to the increase. State Clemency Project, *supra*.

beginning of decades of incarceration for crimes committed before reaching full neurological and developmental maturity.

2) The majority of the felony-murder population in prison are middle-aged inmates who have served more than 20 years.

In Pennsylvania the majority (three-fifths) of the second-degree prison population have served more than 20 years. *See* PLSE, *supra*. Our dataset showed a higher number who had passed the 20-year mark: 70% of Philadelphia’s felony-murder population. Most of Philadelphia’s felony-murder population are middle-aged, between 40 and 70.

Table 3. Years of Confinement.

Years in Confinement	Count of Individuals	Percent of Total
1-5	15	2.59%
6-10	54	9.33%
11-15	48	8.29%
16-20	59	10.19%
21-25	74	12.78%
26-30	109	18.83%
31-35	87	15.03%
36-40	72	12.44%
41-45	51	8.81%
46-50	9	1.55%
51-55	1	0.17%
Grand Total	579	100.00%

Table 4. Current Age.

Age	Count of Current Age	% of Current Age
21-30	24	4.15%
31-40	93	16.06%
41-50	149	25.73%
51-60	155	26.77%
61-70	134	23.14%
71-80	21	3.63%
81-90	3	0.52%
Grand Total	579	100.00%

3) Many of those who spend years in prison undergo a significant transformation -- developing skills, dealing with past trauma, focusing on education, mentoring others, and accepting responsibility for the harms they have caused.

All of those whose affidavits we present highlight the transformation they, or their loved one, experienced after years behind bars. Steve Austin (Exhibit B at 9) relates that lifers at his institution developed their own organizational structure to create opportunities for enrichment, because lifers were excluded from most prison-sponsored programs. In doing so, he and others developed skills and gained the trust of prison officials:

Because we (lifers) were ... excluded from what was happening, the way I dealt with that was by building lifers organizations.... We established a liaison with prison officials who had control over our lives. They would tell us no for anything we tried to do, so we would research projects. We learned how to troubleshoot the issues, and to write in a polite and professional way to make those requests. The authorities recognized our skill level when reading our memorandums. They gave us that respect... We built organizations to invite people into the prisons. We started teaching these classes—violence prevention, character development, batterers groups (with prison staff), “thinking for a change” ... I became a mentor—one of those individuals who was looked to for solutions and answers.... The staff learned how to teach the programs from us. Instead of getting rid of us, they kept us on as peer assistants.

When she went to prison, Tamika Bell (Exhibit C at 5-6) was able to finally deal with the past trauma that had informed her criminal behavior:

I was very angry when I went to prison. When I went into House Hope I was able to release that anger. I chose to forgive my co-defendant and chose to forgive myself. I stopped being bad and getting write ups. That’s when I got into the puppy program. They were very choosy and picky about who gets into the program. They were surprised when I applied. But I stayed out of trouble and I was in that program for like 7 years.

The professionals in there that we had to talk to. They helped change your thinking and your mindset and give you the tools you need to cope, dealing with trauma. Most of the other ladies in there had also experienced trauma.

All the former lifers we spoke with emphasized that change was not possible until they took responsibility for the harm they had caused. As John Pace (Exhibit D at 9) explained:

I think I changed before the sentence. Before the guy passed away, it resonated with me because of the harm I had done. I knew I wanted to change then. It was even more devastating that he passed away. I couldn't believe that—that I was responsible for someone's life being taken. I did have to wrestle with that internally. How could I put myself in a situation to make better decisions, so that this never happened again? I would say, "Let me do these things to help myself become a better person and develop skills." I had goals from the very beginning—get my G.E.D., go to college, getting skills to make better decisions. They propelled me throughout my prison time. Then, later, I focused on how I could help other people make better decisions.

As for others, the mentorship of older lifers was crucial to Stacey Torrance's rehabilitation while in prison (Exhibit E, at 5):

I was embraced by some older men, ironically also lifers, who kept me out of trouble. They already had 15-20 years on a life sentence. They took me under their wings and encouraged me to read and study. I spent my time reading and studying, not playing games. That was my outlet.

Like everyone we spoke with, Tyrone Werts (Exhibit F at 6) also emphasized the importance of education in helping him transform into a better person:

When I first got to prison, they gave me a battery of tests. A guy named Ernie Bellow was the counselor who did the assessments and interviewed me. He called me to his office and talked to me about the results. It was unusual that he took interest in me. He said, “you’re reading at a second-grade level and your math skills are at a third-grade level.” I thought to myself, “OK, I know I’m dumb. I had a teacher in elementary school tell me that I wasn’t that bright.” But the counselor continued on. He said, “However, your IQ is above average. You could do academic work, but you’re just not applying yourself.” He wanted to put me in night school to get my GED. At first, I resisted, but he stayed on me. Eventually, I joined his class and he taught me.

I took the GED and I passed. I thought I had failed it, but he told me I got the highest score of anyone who had taken it. I felt so proud. Eventually, I signed up for college and received a bachelor’s degree from Villanova University.

The juvenile lifers who were resentenced and paroled (Austin, Bell, Pace, and Torrance), along with a former felony-murder lifer whose sentence was commuted (Werts), make compelling cases for the possibility of redemption. However, despite their transformations, the state legally views felony-murder lifers who remain inside as

irredeemable. No sentence should impose a stagnant view of redemption. This perspective on redemption runs contrary to the jurisprudence of most countries around the world, as well as human rights law, which have concluded that life sentences are inhumane and cruel if review and release on the basis of rehabilitation is not possible. *See* Rachel Lopez, Terrell Carter & Kempis Songster, *Redeeming Justice* 116 NW. U. L. REV. 2 (2021).²⁴

A better alternative would be for such irrevocable determinations not to be made at sentencing. Even if some people seem irredeemable at the time of their crimes, can such a determination ever be made prospectively? Empirical evidence suggests not. A 2020 study conducted by researchers at Montclair State University found that only 1 percent of those former juvenile lifers from Philadelphia who had been resentenced and then released post-*Miller* had recidivated. Tarika Daftary-Kapur & Tina Zottoli, Montclair State University, *Resentencing of Juvenile Lifers: The Philadelphia Experience* (2020).²⁵ In other words, the irrebuttable

²⁴ Available at https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3728752.

²⁵ Available at <https://digitalcommons.montclair.edu/justice-studies-facpubs/84/>.

statutory presumption about these offenders' possibility for redemption at sentencing was wrong 99 percent of the time. Irrebuttable presumptions that bear scant relation to what is actually true have been held to violate due process. *See Commonwealth v. DiFrancesco*, 329 A.2d 204, 208 (Pa. 1974); *Commonwealth v. Turner*, 317 A.2d 298, 301 (Pa. 1974).

C. Paroled Lifers Give Back To Their Communities In Important Ways, Including Mentoring Youth, Strengthening Ties, And Deterring Crime.

Dr. Dorothy Johnson-Speight, founder and executive director of Mothers in Charge, a Philadelphia-based victims' rights organization, has seen former juvenile lifers released in the City and the effect on the community has been overwhelmingly positive (Exhibit A at 2):

I have seen people who are compassionate wanting to make a difference, no longer the 17-year-old who took someone's life. I have seen that in men coming home who are now working for my organization, mothers in charge. I have seen it in Steve Austin, who works with us. Sometimes we are different, rehabilitated. I believe that sometimes these incarcerations lead to people who can come home and be a real asset, a real jewel, to the community. An individual does not need to be held for the rest of his life—forever—for something he did on his worst day. In Pennsylvania, it's forever. In the case of

felony-murder, in which it's someone who did not even take the person's life, they should not be held forever.

In Philadelphia today, gun violence has increased substantially in recent years, especially since the pandemic. The City has struggled to find crime prevention strategies that work. Dr. Johnson-Speight says that former lifers—people who have street credibility but also wisdom—can be an important part of combatting violence (Exhibit A at 5):

I've seen many of the juvenile lifers make an impact. It's not in the sense of doing a job, but more like a calling that they have to make a difference. They really want to help heal the community, and in doing so, it helps them heal their own trauma. That trauma can be 20, 30, 40 years old. Their healing begins when they come home. You help yourself when you help others. The more you get involved in helping others, the more difference you make.

We need comprehensive community healing. The whole point of it is that just because these people are sentenced, they're not the monsters you may think them to be. I want the community to see and understand. We did a 2-day event that facilitated conversation between mothers who had lost a child to violence and juvenile lifers who had come home. It was worth watching the conversation and the healing. These people are just like your sons and daughters who made a mistake. We have a saying, "Only by the grace of God, there go I."

Brenda Harris, a longtime resident of North Philadelphia and community activist agrees (Exhibit G at 8):

When the lifers come home, they put positive things back into the community. They try to explain to the young kids what violence is, and they try to do good stuff. Them coming home is a very positive thing.

Harris's son was sentenced to LWOP for felony-murder 20 years ago. She does not feel the City's anti-violence efforts are helping much.

She feels parolees who spent years behind bars might have an impact

(Exhibit G at 9):

I think that if some of these people who are behind bars could come out and talk to these people—these kids—that are picking up guns, it would make a big difference. These people don't know anything about incarceration, or how long you're going to be in there for taking a life. It might help if people that were behind bars could come out. It would get these kids to realize, to pick up a book and read it. They would learn about their history instead of black-on-black crime. They would think about what their ancestors did to get them where they are today... they would see that there's only two ways to go on their paths: behind bars, or six feet under. The solution is to pick up a book, to get a job and get your education.

Martha Williams' son was sentenced to LWOP for felony-murder two years ago. She sees a connection between the lack of resources and mentorship and him getting into trouble (Exhibit H at 7):

Older folks have a role to play with kids... I say that because I am older, and I interact with them. I've noticed an uptick in new move-ins on the block. We didn't have any kids last year, but now we have about 20 kids on the block. As I watch these

kids grow and develop, I'm sure to interact with them. I'm working on bringing resources on my own block that I wasn't able to bring to my own son. The school kept suspending him, and that was a nightmare. I didn't see this situation in my son's future, and I don't want to see these parents go through the same thing.

The lifers coming home should be used as catalysts for this change because their mentorship is priceless. Their support, their thoughts, their experiences can be used as a guide for this change.

Tyrone Werts explains why former lifers have something important to offer when combatting violence on the streets (Exhibit F at 9-10):

Those who know the street crime culture—ex-offenders, ex-gang members—are the best people to get involved in the lives of younger guys. They gravitate towards us. They call us “pops”. Inside, a lot of lifers had younger guys who called them “pops”. That was someone who looked out for them. I thought that model would work in our communities: older guys who know the streets looking out for the younger guys. There are a lot of ex-offender guys who are married now. They have matured and they are responsible. They know the community, know who's who, and can speak to them in a language that no one else can understand. Whatever the city is doing now is not working. We need to think outside of the box.

Since their release the juvenile lifers have contributed a great deal to their communities. John Pace works as the Reentry Coordinator at the Youth Sentencing & Reentry Project in Philadelphia and as a Program Associate at Temple University's Inside-Out Center. Stacey Torrance has

been a volunteer with Mothers In Charge, Inter-Generational Healing Circle, Families Against Mandatory Minimums, Incarcerated Children Action Network, and Youth Sentencing & Reentry Project. He has also created a nonprofit organization, Clothes Off My Back, which gives away free clothes to returning citizens in need. Steve Austin also connected with Mothers In Charge immediately after his release. He began volunteering as lead facilitator and is now Director of Participatory Defense, a community organizing model designed to help people facing charges understand and navigate the criminal justice system. Tyrone Werts founded the End Crime Project and the Lifers Public Safety Initiative. He also serves on the Mayor's Commission on African American Males and was a Soros Justice Fellow.

Certainly, the Appellant could make an equally promising contribution to his community someday. Conventional wisdom in Pennsylvania would surmise that Appellant may deserve a second chance, post-rehabilitation. It violates our evolved standards of decency to deny him the chance of eventual parole and redemption.

CERTIFICATION OF COMPLIANCE WITH RULE 531

I do hereby certify on this 22nd day of April, 2024, that the Brief For *Amicus Curiae* filed in the above captioned case on this day does not exceed 7,000 words. Using the word processor used to prepare this document, the word count is 6,977 as counted by Microsoft Word.

Respectfully submitted,

/S/

CHERYL BROOKS, Assistant Defender
Attorney Identification No. 201157

BRADLEY S. BRIDGE, Assistant Defender
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AARON MARCUS, Assistant Defender
Chief, Appeals Division

KEISHA HUDSON, Chief Defender

CERTIFICATION OF COMPLIANCE WITH RULE 127, PA.R.A.P.

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Respectfully submitted,

/S/

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EXHIBIT A

AFFIDAVIT/DECLARATION OF DOROTHY JOHNSON-SPEIGHT

Pursuant to 18 Pa C.S. §4904

Dr. Dorothy Johnson-Speight, MHS, LPC is the Founder and National Executive Director of Mothers In Charge, Inc. (MIC). She is a highly regarded leader, advocate, speaker, guest radio/television commentator, and a clarion voice against the war to end senseless acts of violent crime. Her work, though rooted in Philadelphia, has led to national appearances and presentations across the United States and abroad. The Open Society Foundations named Dr. Johnson-Speight a member of the 2015 class of Soros Justice Fellows. A licensed family therapist, Dr. Johnson-Speight has a distinguished career in victim advocacy. Following the tragic murder of her son Khaaliq Jabbar Johnson in 2001 over a parking space dispute, Dr. Johnson-Speight along with other grieving mothers founded the non-profit organization Mothers In Charge, Inc., (MIC). Based in Philadelphia, MIC is a grassroots organization whose mission is violence prevention through education. MIC chapter affiliates have been established in Harrisburg, New York, Los Angeles, San Francisco, and Kansas City.

Through her work with Mothers In Charge, Dr. Johnson-Speight began to realize how angry teens and young adults who are unable to cope with their own anger and pain resort to violence within their communities. She began to work with juvenile offenders, some of whom are incarcerated for murder. Recognizing these young men and women may be returning citizens, she began to work with this population using a cognitive skills development model titled "Thinking For A Change." The program addresses the development of prosocial and proper decision making skills, violence prevention, and preparation for re-entry back into their communities. Thinking For A Change has been successfully introduced and implemented in numerous Philadelphia correctional facilities. Dr. Johnson-Speight has most recently established Women Working For A Change (WW4C), an onsite job-training program for women who were formerly incarcerated. She is deeply committed to working with and supporting returning citizens, including former juvenile lifers who have returned home through parole or commutation. She leads conversations on Comprehensive Community Healing and hosted a 2-day seminar at Lincoln University, with juvenile lifers and mothers who have lost children to violence, for the purpose of transformative healing on both sides.

I DOROTHY JOHNSON-SPEIGHT do verify swear that the answers to the below questions are true to the best of my knowledge:

- 1. As an advocate for crime victims, what do you think about the idea of people sentenced to life without parole for second degree murder being eligible for parole?**

THE THOUGHT PROCESS THAT PEOPLE OFTEN BELIEVE IS THAT EVERY VICTIM WANTS TO SEE PEOPLE GO AWAY FOR THE REST OF THEIR LIVES AND NEVER COME HOME. THAT IS NOT ALWAYS TRUE. IF MOTHERS SEE

THAT SOMEONE HAS DONE THE WORK IN PRISON TO TRANSFORM THEIR LIFE AND REMORSE IS PRESENT, MOST WANT TO SEE THE OPPORTUNITY FOR REDEMPTION. WE FEEL THAT THE SYSTEM NEEDS TO DO WHAT IT CAN FOR REHABILITATION AND TRANSFORMATION. THAT IS WHAT MOST VICTIMS WANT TO SEE.

2. Do you know someone sentenced to life who was eventually released? How did that person change after being sentenced to life?

I THINK THAT ONE CAN DO TIME, OR TIME CAN DO THEM. IN MOST CASES, IT IS A CONSCIOUS DECISION THAT SOMEONE MAKES DURING THEIR INCARCERATION ON HOW TO CHANGE, IMPROVE, OR BECOME A BETTER PERSON. IT IS UP TO THEM ON HOW THEY WANT TO APPROACH IT.

I LOVE SOMEONE WHO DID 40 YEARS IN PRISON FOR A CRIME HE DID NOT COMMIT. HE WAS SENTENCED TO LIFE IN CALIFORNIA. I KNEW HIM BEFORE HIS INCARCERATION, AND I HAVE KNOWN HIM SINCE HE HAS COME HOME. HE IS A CHANGED PERSON. HE HAS MADE POSITIVE CHANGES IN HIS LIFE, AND HE HAS CHANGED IN WAYS THAT ARE WONDERFUL AND SURPRISING.

WHEN I LOST MY 2.5-YEAR-OLD DAUGHTER TO MENINGITIS, MY FRIEND WHO HAD ALSO LOST HER DAUGHTER CAME TO BE WITH ME. ONE DAY SHE SAID, " YOU MAY NOT UNDERSTAND THIS NOW, BUT ONE DAY YOU WILL. THIS TRAGEDY WILL MAKE YOU A BETTER PERSON." I SAID WORDS I CANNOT REPEAT. I THOUGHT, "I DID NOT NEED MY DAUGHTER TO DIE TO BECOME A BETTER PERSON." BUT THE FACT IS, OFTENTIMES THESE TRAUMATIC SITUATIONS CAN SOMEHOW TRANSFORM YOU, AND YOU COME OUT OF THEM AS A NEW PERSON WITH A NEW WAY OF THINKING AND BEING IN THE WORLD.

I HAVE SEEN PEOPLE WHO ARE COMPASSIONATE WANTING TO MAKE A DIFFERENCE, NO LONGER THE 17-YEAR-OLD WHO MAY HAVE TAKEN SOMEONE'S LIFE. I HAVE SEEN THAT IN MEN COMING HOME WHO ARE NOW WORKING WITH MY ORGANIZATION, MOTHERS IN CHARGE. I HAVE SEEN THAT IN STEVE AUSTIN, WHO WORKS WITH US. SOME PEOPLE COME HOME AND CAN BE A REAL ASSET, A REAL JEWEL, TO THE COMMUNITY. DOES AN INDIVIDUAL WHO HAS TRANSFORMED HIS LIFE DURING HIS INCARCERATION NEED TO BE HELD FOR THE REST OF HIS LIFE—FOREVER—FOR SOMETHING HE DID ON HIS WORST DAY? LIFE IN PENNSYLVANIA IS FOREVER. IN THE CASE OF FELONY MURDER, IN WHICH IT IS SOMEONE WHO DID NOT COMMIT THE MURDER, SHOULD THEY BE HELD IN A CAGE FOREVER?

3. What impact did the person you know who was sentenced to life had since his release in the community?

THEY HAVE BEEN A POSITIVE IMPACT UPON YOUNG PEOPLE. THEY HAVE COME HOME TO MAKE A DIFFERENCE. WHAT ARE THE EFFORTS THEY ARE MAKING TO CHANGE WHAT IS HAPPENING IN OUR COMMUNITIES NOW? THAT IS WHAT VICTIMS WANT TO HEAR. EVERYONE THINKS THAT EVERY VICTIM JUST WANTS THE INDIVIDUAL TO BE THROWN AWAY FOREVER, BUT THAT IS NOT ALWAYS TRUE. ONE MOTHER, WHO LOST A SON TO VIOLENCE, IS ADVOCATING FOR THE PRISON SYSTEM IN HER CITY TO DO A BETTER JOB. SHE IS ADVOCATING FOR THE SYSTEM TO HELP PEOPLE TRANSFORM THEIR LIVES AND THEIR THINKING WHILE INCARCERATED AND TO PREPARE THEM TO COME HOME TO LEAD BETTER LIVES. OFTENTIMES THERE WERE THINGS GOING ON IN THE PERSON'S LIFE— THE TRAUMA— THAT LED THEM TO DO WHAT THEY DID. WE OFTEN ASK WHAT'S WRONG WITH THEM, BUT IT'S NOT ALWAYS ABOUT WHAT'S WRONG WITH THEM BUT WHAT'S HAPPENED TO THEM. WE KNOW HURT PEOPLE HURT PEOPLE.

4. How was the community/family impacted by someone you know being sent away?

I HAVE HEARD THE EXPRESSION, "WHEN SOMEONE GOES TO PRISON AND DOES TIME, THE FAMILY ALSO DOES THE TIME." FOR MY LOVED ONE WHO WAS SENTENCED TO LIFE, HIS FAMILY ALWAYS BELIEVED HE WOULD COME HOME. THERE WAS ALWAYS A HOPE. HE WAS THE PATRIARCH OF HIS FAMILY. THE ABSENCE OF OUR LOVED ONES IN THE FAMILY DUE TO INCARCERATION IMPACTS FAMILIES FOR YEARS TO COME. IN HIS CASE THERE IS AN IMPACT EVEN TODAY, WITH HIS GRANDCHILDREN— WHO COULD THEY HAVE BEEN HAD HE BEEN A PART OF THEIR LIVES? THEIR ABSENCE IN OUR LIVES PUNISHES THE CHILDREN IN THE FAMILY EVEN THOUGH THEY DID NOT COMMIT A CRIME. IT JUST IS NOT THE SAME HAVING A FATHER RAISE CHILDREN FROM BEHIND THE WALLS OF A PRISON. THAT IS JUST NOT THE WAY WE WANT TO SEE OUR CHILDREN RAISED— SEEING THEIR FATHER THROUGH BARBED WIRE. IN SO MANY CASES, PEOPLE DO NOT DESERVE TO BE BEHIND BARS.

THE RELEASE OF THIS FORMER LIFER HAD TO DO WITH A LAW IN CALIFORNIA. THE LENGTH OF TIME THAT HE HAD ALREADY SERVED WAS OVER 40 YEARS, AND HE WAS OVER THE AGE OF 65. BOTH FACTORS TOGETHER MADE HIM ELIGIBLE FOR GERIATRIC PAROLE. PENNSYLVANIA SHOULD LOOK TO CALIFORNIA WHEN INCARCERATED INDIVIDUALS ARE NOT SEEN AS A SAFETY RISK ANY LONGER OR HAVE REACHED A GERIATRIC STAGE.

5. What has life been like for you or someone you know since being paroled? Have there been any positive or negative interactions with the community?

THERE HAS BEEN NO NEGATIVE, BUT A LOT OF POSITIVE. THERE IS PARTICIPATORY DEFENSE NOW, HELPING YOUNG PEOPLE, AND A NEW INITIATIVE FOR PCRA. THERE ARE WOMEN COMING HOME FROM INCARCERATION AND WE ARE DEVELOPING A NEW PROGRAM TO SUPPORT THEM. TODAY WOMEN ARE THE FASTEST GROWING POPULATION IN PRISONS IN PENNSYLVANIA. MANY WOMEN ARE RETURNING AFTER SERVING LONG SENTENCES TO HAVE POSITIVE INTERACTIONS WITH THEIR CHILDREN, THEIR FAMILIES, AND THEIR COMMUNITIES.

6. Over the years, the city has tried to address community violence. What have you noticed about these efforts?

WHAT I HAVE NOTICED MOST ABOUT THESE EFFORTS IS THAT THE PEOPLE WHO ARE MOST IMPACTED ARE OFTEN NOT AT THE TABLE. THE EFFORT IS A WATERED-DOWN EFFORT— THE PEOPLE WHO ARE MOST IMPACTED, AND LIVE WITH THE EFFECTS, DON'T HAVE A SAY IN SOLUTIONS FOR THE SITUATIONS. THOSE WHO SHOULD BE AT THE TABLE ARE YOUNG PEOPLE, ESPECIALLY, OR PEOPLE WHO HAVE MADE BAD CHOICES IN THEIR LIVES AND HAVE LEARNED FROM THEM.

7. What do you think creates violence in your community?

THERE ARE SO MANY DIFFERENT THINGS, SO MANY ISSUES: POOR EDUCATION, POVERTY, TRAUMA, UNRESOLVED GRIEF AND LOSS, VIDEO GAMES, AND SOME OF THE MUSIC. THINGS LIKE VIDEO GAMES OR MUSIC IMPACTS THE FRAME OF REFERENCE FOR A YOUNG PERSON AND CAN IMPACT THEIR THINKING AND BEING. IN ADDITION, UNRESOLVED GRIEF AND PAIN SHOWS UP LIKE ANGER OFTENTIMES, ESPECIALLY IN MEN. IN MANY CASES IT IS DIFFICULT FOR THEM TO COMMUNICATE THAT PAIN BECAUSE OF SOCIETAL EXPECTATIONS FOR SHOWING EMOTIONS OR PAIN. THEY OFTEN THINK, "I DON'T CARE ABOUT ANYBODY ELSE— NO ONE CARED ABOUT ME." IF YOUR REALITY IS THAT YOU ARE NOT GOING TO LIVE PAST 18, THEN WHY SHOULD YOU CARE ABOUT SOMEONE ELSE'S LIFE, OR EVEN TAKING SOMEONE'S LIFE, WHEN YOUR LIFE DOESN'T MATTER? THEY CAN'T SEE A FUTURE IN THEIR REALITY OR HAVE ANY HOPE.

8. What can be done about the violence?

THERE ARE SO MANY CONTRIBUTORY FACTORS, AND THERE IS NOT JUST ONE SOLUTION. BUT MORE EXPERIENCED MENTORS ARE IMPORTANT FOR OUR YOUNG PEOPLE. POSITIVE MENTORS WHO GENUINELY CARE CAN HELP TO MAKE A DIFFERENCE. CREDIBLE MESSENGERS SUCH AS FORMER JUVENILE LIFERS WHO MAY HAVE LIVED A SIMILAR LIFE IN THEIR TEENS CAN RELATE TO THE TEENS OF TODAY, AND THEY CAN BE GREAT MENTORS AND COACHES.

I HAVE SEEN MANY OF THE RETURNING JUVENILE LIFERS MAKE AN IMPACT. IT IS NOT IN THE SENSE OF DOING A JOB, BUT MORE LIKE A CALLING THAT THEY HAVE TO MAKE A DIFFERENCE. THEY REALLY WANT TO HELP HEAL THE COMMUNITY, AND IN DOING SO, IT HELPS THEM HEAL FROM THEIR OWN TRAUMA. THAT TRAUMA CAN SOMETIMES BE 20, 30, 40 YEARS OLD. THEIR HEALING CAN BEGIN WHEN THEY COME HOME. I BELIEVE OFTEN YOU HELP YOURSELF WHEN YOU HELP OTHERS. THE MORE YOU GET INVOLVED IN HELPING OTHERS, THE MORE DIFFERENCE YOU CAN MAKE.

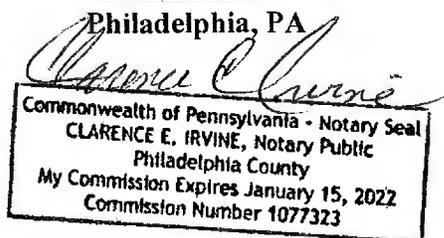
WE NEED COMPREHENSIVE COMMUNITY HEALING. THE WHOLE POINT OF IT IS THAT JUST BECAUSE SOME PEOPLE ARE SENTENCED TO LIFE, THEY ARE NOT THE MONSTERS SOME MAY THINK THEM TO BE. I WANT THE COMMUNITY TO REALLY UNDERSTAND THE SYSTEMS THAT IMPACT OUR FAMILIES AND COMMUNITIES, INCLUDING JUDICIAL AND PENAL SYSTEMS THAT CAN HAVE UNJUST SITUATIONS THAT UNFAIRLY IMPACT OUR LOVED ONES AND COMMUNITIES.

MANY OF OUR FORMERLY INCARCERATED ARE JUST LIKE OUR SONS AND DAUGHTERS; THEY ARE OUR SONS AND DAUGHTERS. TO LOSE A SON OR DAUGHTER TO VIOLENCE IS A PAIN THAT NEVER GOES AWAY. WE HAVE LOST SONS, DAUGHTERS, AND LOVED ONES TO VIOLENCE AND WE HAVE LOST SONS, DAUGHTERS, AND LOVED ONES TO INCARCERATION. WHAT MUST WE DO TO SAVE OUR SONS, OUR DAUGHTERS, AND OUR LOVED ONES? REMEMBER THE SAYING, "ONLY BY THE GRACE OF GOD, THERE GO I."

I hereby swear, declare and verify under penalty of perjury, that the facts set forth above are true and correct to the best of my personal knowledge, information and belief pursuant to 18 Pa. C.S. § 4904.

Dated: October 19, 2021

Philadelphia, PA



NAME

Dorothy Johnson Speight
Dorothy Johnson Speight

EXHIBIT B

AFFIDAVIT/DECLARATION OF STEVE AUSTIN

Pursuant to 18 Pa C.S. §4904

Steve Austin was born and raised in Philadelphia in the 1960s and has been a lifelong learner and leader. He was convicted at the young age of 15 and sentenced to Life Without Parole in PA. After serving 42 years in prison, he was resentenced and paroled on April 1st 2017 due to the Supreme Court ruling declaring juvenile LWOP sentences unconstitutional. While in prison, Steve authored the landmark Austin litigation (*Austin v. Pennsylvania Dept. of Corrections*, 876 F. Supp. 1437 (E.D. Pa. 1995)) which changed the face of prisons in Pennsylvania, leading to cleaner and safer facilities with greater access to education and counseling. He was a peer specialist and developed and facilitated programs for over 30 years for youth and adults, pioneering programs such as violence prevention, anger management, character development, Thinking for a Change, citizenship, and batterers classes. Upon release, he immediately connected with Mothers In Charge and began volunteering as lead facilitator and is now Director of Participatory Defense, a community organizing model designed to help people facing charges understand and navigate the criminal justice system. With encouragement from MIC, he enrolled in college at the tender age of 60 and has earned an Associate Degree in Human Services at Harcum College, which also presented him with the “Harcum College Human Services Leadership Award for 2021” bestowed upon students who have demonstrated service to the college or community, met academic excellence, and exhibited strong leadership qualities.

I STEVE AUSTIN do verify swear that the answers to the below questions are true to the best of my knowledge:

1. Let’s talk about what was going on for you or your loved one before the arrest:

a. What was going on in terms of work or school?

I WAS A NERD, AND I LOVED SCHOOL. I LIKED SCHOOL UNTIL I GRADUATED FROM THE 7th GRADE. FROM THERE, THINGS CHANGED. AT THE START OF EIGHTH GRADE, THEY BUSSED MY ENTIRE SCHOOL TO BARTLETT IN SOUTH PHILLY. EVERYONE WENT THERE— EVERYONE EXCEPT ME. I WOUND UP IN GILLESPIE, NEAR GRATZ. I COULDN’T UNDERSTAND WHY. I REMEMBER ASKING MY MOM WHY THIS HAPPENED, AND SHE SAID IT WAS JUST A SCHOOL.

BUT I WAS BEING SEPARATED FROM ALL MY FRIENDS, FROM EVERYONE I HAD GROWN UP WITH AND BUILT BONDS AND FRIENDSHIPS WITH. I REALLY FELT SOME TYPE OF WAY ABOUT IT. I STOPPED GOING TO SCHOOL. I WANTED TO GO TO SCHOOL, AND I TRIED, BUT EVERY TIME ON

THE WAY TO GILLESPIE, I WOULD PASS THE BUS TAKING ALL MY FRIENDS TO SCHOOL DOWN IN SOUTH PHILLY. IT WOULD MAKE ME REALLY SAD BECAUSE I WAS GOING UP TO GILLESPIE ALL BY MYSELF. I GOT SICK OF IT. I WAS ALONE THERE ALL DAY. THERE WERE SOME PROBLEMS AT MY NEW SCHOOL, TOO, LIKE GANG ISSUES, SO I HAD SOME PROBLEMS BECAUSE OF THAT.

IT WASN'T A GOOD THING TO SEPARATE ME FROM ALL OF MY FRIENDS AND RELATIONSHIPS AT THAT AGE. MY PARENTS AND EDUCATORS DIDN'T TAKE THIS INTO CONSIDERATION. I HAD BEEN AN HONOR STUDENT. I HAD NO PROBLEMS. I LOVED SCHOOL. BUT I STARTED WITH TRUANCY. I WAS NOT GOING TO SCHOOL. MY MOM WAS REALLY UPSET; SHE THOUGHT IT WAS SILLY.

I ENDED UP GETTING ADJUDICATED FOR TRUANCY. I WOUND UP AT A PLACE CALLED SHALLCROSS. IT WAS A SCHOOL FOR JUVENILES WHO WERE DELINQUENT IN SOME WAY. I WAS THERE FOR 21 MONTHS. IT WASN'T AS DISCIPLINARY AS OTHER SCHOOLS, SO I WAS ALLOWED TO GO HOME ON THE WEEKENDS. I WAS SO ADVANCED IN TERMS OF MY KNOWLEDGE COMPARED TO THE OTHER KIDS THAT THEY ALLOWED ME TO GO TO A PLACE CALLED ABRAHAM LINCOLN.

THIS AREA WAS PREDOMINANTLY WHITE; THERE WERE 3 BLACK STUDENTS IN THE WHOLE SCHOOL. THIS WAS WHERE I EXPERIENCED RACISM FOR THE FIRST TIME IN SCHOOL. I WAS IN THE AUDITORIUM ONCE, AND OTHER PEOPLE WERE THERE. A GUY SOCKED ME FROM BEHIND SO HARD THAT I PASSED OUT. WHEN I WOKE UP, THE WHOLE AUDITORIUM WAS EMPTY. I COULDN'T GET OUT OF THE SCHOOL. I WENT TO FIND A TEACHER, AND I TOLD HER THAT I HAD TO GO BACK TO SHALLCROSS. SHE CALLED THE POLICE. I DIDN'T TRUST THE TWO OFFICERS WHO CAME TO GET ME.

I REFUSED TO GO BACK TO THAT SCHOOL. THIS REPRESENTED ANOTHER FAILURE ON MY PART, PARTLY BECAUSE OF CIRCUMSTANCES AND CONDITIONS THAT WERE NOT OF MY MAKING. MY LIFE WAS GOING FINE UNTIL THESE INTERRUPTIONS. BECAUSE OF CIRCUMSTANCES AND CONDITIONS THAT WERE NOT OF MY MAKING, I WAS UNABLE TO CONTINUE WITH SCHOOL.

b. Living at home?

I WAS LIVING IN A JUVENILE FACILITY BECAUSE OF TRUANCY. I WAS ALLOWED TO GO BACK HOME ON THE WEEKENDS. I HADN'T HAD ANY CONTACT WITH THE LAW AT THAT POINT.

c. Who lived in the house?

MY MOTHER, MY STEPFATHER, AND TWO OF MY BROTHERS LIVED AT HOME. I WAS THE YOUNGEST OF SIX CHILDREN.

d. What do you remember about the neighborhood?

I WAS FROM NORTH PHILADELPHIA. MY NEIGHBORHOOD WASN'T UNLIKE MOST NEIGHBORHOODS. IT WAS NOT AS VIOLENT AS SOME PEOPLE MIGHT THINK, EITHER. THERE WERE SOME FIGHTS. IT WAS 1975, WHICH WAS STILL THE GANG ERA. BUT THE GANGS HAD MORE RESPECT FOR FAMILY AND COMMUNITY. THEY WEREN'T KILLING EACH OTHER LIKE THE WAY THEY ARE TODAY.

I WAS ABLE TO NAVIGATE MY WAY THROUGH IT ALL. I HAD 4 OLDER BROTHERS WHO HAD NAVIGATED IT, AND I WAS KNOWN AS THEIR LITTLE BROTHER. BECAUSE OF THAT, I DIDN'T HAVE ANY ISSUES THAT OTHERS MIGHT HAVE COMING UP. I WAS SPARED SOME OF THE HARSHNESS THAT OTHERS MIGHT HAVE ENCOUNTERED. MY HOME LIFE WAS GREAT, UP UNTIL THAT TIME I GRADUATED FROM JUNIOR HIGH.

2. Tell us about the incident that resulted in you or your loved one receiving a life sentence.

IT WAS AROUND 1975, WHEN I WAS GOING ON 15. I BECAME AWARE OF A GROUP CALLED THE NATION OF ISLAM, AND I BECAME A MEMBER. I STARTED WORKING AT A STORE CALLED "A STEAK AND TAKE" THAT WAS ASSOCIATED WITH THE MUSLIM COMMUNITY, PEOPLE WHO WERE MEMBERS OF THE NATION OF ISLAM.

I ENDED UP OPENING MY OWN STORE ON CHADWICK AND CUMBERLAND. IT WAS A RESTAURANT WHERE WE MADE CHEESESTEAKS, FAST FOOD STYLE. WE MADE OUR SIGNATURE BEAN SOUP, HOAGIES, AND ICE CREAM. THAT WAS A BIG BOOST FOR US, AND IT HAD GREAT REVENUE ALL YEAR LONG.

I WAS LOCKING UP FOR THE DAY, AROUND THE 4th OF JULY. MY PARTNER HAD GONE TOWARD 17th STREET, WHICH WAS THE NEXT STREET OVER FROM THE STORE. I LOCKED UP AND CAME DOWN. I FOUND MY PARTNER FIGHTING A GUY. I WAS YOUNG, BUT I WAS MATURE FOR MY AGE. I DIDN'T HANG AROUND WITH GUYS MY AGE. THEY DIDN'T THINK THE SAME WAY I DID. I DIDN'T KNOW WHAT THE FIGHT WAS ABOUT, BUT I TRIED TO STOP IT AND BREAK IT UP. INSTEAD OF SEEING ME AS A PEACEMAKER, THE GUY MY PARTNER WAS FIGHTING SAW ME AS AN AGITATOR, OR SOMEONE WHO WOULD HARM HIM. HE SOCKED ME AND CUT MY EYE OPEN. I COULDN'T SEE. I WAS IN A DAZE. I MANAGED TO FIND

MYSELF BACK TO THE STORE. I KNEW WE KEPT A GUN IN THERE. I GOT THE GUN AND CAME BACK. THE GUY HAD MY PARTNER ON THE GROUND BY THEN, WITH A KNIFE OVER HIM. HE SAID TO MY PARTNER, "DON'T YOU KNOW I COULD KILL YOU?"

I REMEMBER SQUEEZING OFF A SHOT. IT WAS THE MOST UNLUCKY SHOT OF MY LIFE, BECAUSE IT HIT HIM IN THE BACK OF THE HEAD AS HE WAS FLEEING. I RAN AWAY. I DIDN'T EVEN KNOW HE HAD BEEN HIT UNTIL I HEARD LATER THAT HE WAS IN THE HOSPITAL. I WAS AFRAID. I DIDN'T KNOW WHAT TO DO. I STAYED AWAY FROM MY HOME, AND A COUPLE OF MONTHS LATER, POLICE OFFICERS PICKED ME UP WHILE WALKING DOWN THE STREET.

I DIDN'T DENY MY CULPABILITY, AND WHAT I WAS RESPONSIBLE FOR. THERE WERE NO EXCUSES. I KNEW THAT I HAD SHOT A MAN, AND THAT HE DIED A COUPLE OF DAYS LATER IN THE HOSPITAL. I KNEW THAT I HAD KILLED A MAN. I ACCEPTED RESPONSIBILITY FOR THAT.

I RECEIVED A LIFE SENTENCE. THERE WERE NO DEALS OFFERED TO ME. I THOUGHT IT WAS BECAUSE OF WHO I WAS ASSOCIATED WITH. I DIDN'T LEARN UNTIL LATER THERE WERE SO MANY OTHER OPTIONS FOR ME, AND WHAT MY ATTORNEY, THE DISTRICT ATTORNEY, OR JUDGE COULD HAVE DONE. I DIDN'T FULLY UNDERSTAND WHAT HAD HAPPENED TO ME.

a. Where/when did the incident take place?

IT TOOK PLACE AT 17TH AND CUMBERLAND.

b. What do you remember about you or your loved one's interactions with the police?

THE POLICE PICKED ME UP WHILE I WAS JUST WALKING DOWN THE STREET. THEY TOOK A STATEMENT FROM ME ABOUT WHAT HAPPENED. I KNEW I KILLED A MAN. THERE WAS NOTHING FOR ME TO CONFESS TO, AND I TOLD THE TRUTH ABOUT WHAT HAPPENED. I DIDN'T KNOW THE LAW. I JUST TOLD THE TRUTH ABOUT WHAT I DID.

THEY KEPT ME AT THE STATION LONGER THAN THEY SHOULD HAVE. THEY DIDN'T NEED TO SWEAT ME. I DID GET A VISIT FROM SOMEONE WHO TOLD ME THAT I DIDN'T HAVE TO TALK TO THEM OR TELL THEM ANYTHING. HE WAS A JUVENILE COUNSELOR WHO LATER BECAME AN ATTORNEY. HE GAVE ME GOOD INFORMATION AND ADVICE. BUT BEING THE NERD THAT I WAS, I JUST TOLD THE TRUTH. I HAD THAT MENTALITY AND WASN'T AFRAID OF SAYING WHAT HAPPENED. A STREET SAVVY GUY WOULD HAVE HANDLED THAT DIFFERENTLY, BUT I DIDN'T HAVE ANY OF THAT INFORMATION. I WAS RAISED WELL BY MY MOM, AND I WAS PROUD

OF WHO I WAS AND PROUD OF MY MOTHER, SO I DIDN'T SEE ANY REASON TO LIE.

c. What do you remember about you or your loved one's interactions with your lawyer?

I DIDN'T HAVE A PAID ATTORNEY; I HAD A COURT APPOINTED ATTORNEY. I THOUGHT HE CAME OFF AS KIND OF COLD, BECAUSE HE DIDN'T WANT ME TO SHOW ANY EMOTION. IN RETROSPECT, I DON'T GET THAT. HE TOLD ME THAT HE WAS MY BEST AND ONLY OPTION, AND THAT I SHOULD DO EVERYTHING THAT HE TOLD ME TO DO. AND I BELIEVED HIM.

HE WAS BLACK. I HAD SOME DEGREE OF TRUST IN HIM. EVERYONE ELSE WAS WHITE IN THE JUDICIAL SYSTEM. I DIDN'T UNDERSTAND WHAT HE WAS GOING TO DO. MY ATTORNEY NEVER MENTIONED TRYING TO PLEAD IT DOWN, OR EVEN TALKING TO THE DISTRICT ATTORNEY OR JUDGE. HE TOLD ME TO TAKE A JURY TRIAL.

I WAS 16. IT WAS 1976. AND I WAS SITTING AT THE TABLE NOT SHOWING ANY REMORSE. IT MADE ME LOOK LIKE AN ADULT AND A HARD CASE. IN REALITY, I HAD TO FIGHT SHEDDING TEARS IN THE COURTROOM. I THOUGHT THAT IT WOULD HURT ME TO SHED TEARS.

THE TRIAL WAS A SLAM DUNK FOR THE PROSECUTOR. THEY STILL DIDN'T KNOW WHAT THE ISSUE WAS BETWEEN MY PARTNER AND THE OTHER MAN. I WAS TRYING TO BROKER THE PEACE; IT WASN'T MY FIGHT. EVEN THOUGH I HAD BLOOD STREAMING DOWN MY FACE, I HAD THE WHEREWITHAL TO GO TO MY WORKPLACE, GET THE GUN, AND COME BACK TO THE SCENE. TODAY I KNOW WHAT THAT WAS ABOUT FOR MY CULPABILITY, BUT BACK THEN I DIDN'T KNOW. I UNDERSTAND MY CULPABILITY. I ACCEPT RESPONSIBILITY FOR GOING BACK AND GETTING THAT GUN AND TAKING SOMEONE'S LIFE. I DIDN'T KNOW WHAT ARGUMENTS COULD BE MADE FOR ME.

THE TRIAL WAS A PARADE OF WITNESSES WHO WITNESSED THE EVENT. I TESTIFIED BECAUSE THEY ALREADY HAD MY STATEMENT, BUT THAT STATEMENT COULD HAVE BEEN FOUGHT. I DIDN'T KNOW THAT THEN, BUT I UNDERSTAND THAT NOW. THE STATEMENT SHOULD NOT HAVE BEEN ADMISSIBLE, BECAUSE I WAS A MINOR AND THEY KEPT ME LONGER THAN THEY SHOULD HAVE. I JUST WANTED TO TELL THE TRUTH, THOUGH. I WASN'T AFRAID OF SAYING WHAT HAPPENED. I LEARNED ABOUT THE LEGAL ISSUES LATER. A STREET-SMART PERSON MAY HAVE HANDLED THE SITUATION BETTER, BUT I WAS NOT RAISED TO LIE.

IN RETROSPECT, THERE WERE MITIGATING CIRCUMSTANCES, BUT THE ATTORNEY DID NOT MAKE THOSE ARGUMENTS. THE JURY FOUND ME

GUILTY, AND I HAD A DEATH PENALTY HEARING. THE JURY DECIDED TO GIVE ME LIFE WITHOUT POSSIBILITY OF PAROLE INSTEAD OF DEATH— BUT IN THAT TIME, THEY JUST SAID LIFE BECAUSE OF THE ADDED STATUTE OF WHO CAN BE PAROLED AND WHO CANNOT BE.

MY ATTORNEY TOLD ME I'D BE OUT IN 7-10 YEARS. I DID NOT KNOW IF I WOULD DIE IN PRISON—I DON'T KNOW IF THE ATTORNEY REALLY KNEW WHAT LIFE MEANT. HE TOLD ME 7-10 YEARS IS WHAT LIFE MEANT. IT WAS A MISCONCEPTION BY MANY ATTORNEYS. CALIFORNIA HAD A LAW WHERE LIFE SENTENCES WERE BEING COMMUTED AT EARLY STAGES, SO ATTORNEYS WERE LATCHING ONTO THAT AS IF IT WAS THE NORM. BUT THIS WAS PENNSYLVANIA, NOT CALIFORNIA. IN THE STATE OF PENNSYLVANIA, LIFE MEANS LIFE WITHOUT THE POSSIBILITY OF PAROLE. THAT'S WHAT A LIFE SENTENCE MEANT.

d. What do you remember about you or your loved one's interactions with the prosecutor?

THERE WAS NONE WHATSOEVER, OTHER THAN WHEN HE QUESTIONED ME ON THE STAND. THE PROSECUTOR WAS ALSO A BLACK MALE.

e. What do you remember about you or your loved one's interactions with the judge?

THE JUDGE ACTUALLY TRIED TO HELP ME. I REMEMBER THAT THE JUDGE ASKED MY ATTORNEY ABOUT THE JUVENILE CASES OF THE DAY, WHICH WERE CASES ABOUT JUVENILE CONFESSIONS. THEY GOT INTO A BACK AND FORTH ABOUT MAKING STATEMENTS. HE ASKED MY ATTORNEY IF HE KNEW ABOUT CERTAIN CASES ABOUT THAT. MY ATTORNEY CLEARLY WASN'T FAMILIAR WITH SEMINAL JUVENILE CASE LAW.

THE JUDGE STARTED TALKING DIRECTLY TO ME. HE TOLD ME TO STAND UP. HE SAID TO ME, "MR. AUSTIN, IF YOU WANT ANOTHER ATTORNEY, YOU ARE ENTITLED TO THAT." MY ATTORNEY GOT FLAPPING MAD. HE ASKED THE JUDGE WHAT HE WAS DOING AND ASKED FOR A SIDEBAR. HE DIDN'T SAY WHY, BUT I THOUGHT THAT WAS OMINOUS. BUT THE JUDGE CONTINUED TO TALK. "IF YOU'D LIKE TO HAVE ANOTHER ATTORNEY, YOU'RE ENTITLED," HE SAID.

WHEN THE ATTORNEY GOT ME IN THE BACK, HE GAVE IT A DIFFERENT SPIN. HE TOLD ME THAT THEY WERE TRYING TO GET HIM OFF THE CASE BECAUSE HE WAS BLACK. HE TOLD ME, "HEY, LOOK, I'M YOUR BEST HOPE. THAT'S WHY THEY ARE TRYING TO GET ME OFF THIS CASE." AS IF HE WAS DOING A BANG-UP JOB AND DOING WELL. HE TOLD ME THAT THE JUDGE SHOULDN'T HAVE BEEN INTERFERING WITH HIS CASE.

IN RETROSPECT, I REALIZE THE JUDGE WAS TRYING TO HELP ME. HE WAS SEEING A KID WHO DIDN'T HAVE A RECORD AND KNEW THAT SOMETHING ELSE SHOULD BE HAPPENING INSTEAD OF A DEATH PENALTY CASE. BUT AT THAT TIME, I DIDN'T KNOW. I WAS 16. I COULDN'T TELL WHO WAS FOR ME AND WHO WAS AGAINST ME. WHY WOULD I GIVE UP MY ATTORNEY AND TRY TO GET A NEW ONE? I DIDN'T KNOW ENOUGH ABOUT THAT. I DIDN'T KNOW WHAT TO SAY OR THINK. THE ONLY PERSON WHO ACTUALLY CARED AND TRIED TO LOOK OUT FOR ME WAS THE JUDGE. HE WAS TRYING TO RAISE SUSPICION FOR ME BY SAYING THAT MY ATTORNEY SHOULD BE DROPPING THE CASE AND WAS UNFAMILIAR WITH ANY OF THE JUVENILE LAW. HE WAS TRYING TO LOOK OUT FOR ME.

f. Did the system work the way you expected?

HELL NO. BUT WHAT DID I EXPECT BACK THEN? I HAD NEVER BEEN IN THE CRIMINAL JUSTICE PROCESS BEFORE. I WAS A KID WHO WAS RAISED TO TELL THE TRUTH. I DIDN'T KNOW THE TRUTH WAS AGAINST MY INTEREST, AND I DIDN'T KNOW WHAT I NEEDED TO DO FOR MY INTEREST. I WASN'T GOING TO GET ANY BENEFIT FROM TELLING THE TRUTH. BUT I DIDN'T KNOW THAT.

3. How did you personally change since being sentenced to life?

WHEN I RECEIVED MY SENTENCE, I WAS PLEASED THAT THEY WEREN'T GOING TO KILL ME—THAT THE JURY CHOSE NOT TO GIVE ME THE DEATH PENALTY. WITH THAT BEHIND ME, I HAD NO IDEA WHAT A LIFE SENTENCE MEANT. I ONLY HAD WHAT MY ATTORNEY HAD TOLD ME, THAT I MIGHT DO 7 YEARS AND THEN HAVE THE CHANCE TO GO HOME.

IT WASN'T UNTIL 4-5 YEARS LATER, MAYBE 1979 OR 1980, THAT THE REALIZATION OF MY CONDITION STARTED TO HIT ME. THEY EXPECTED ME TO DIE IN PRISON.

I RECALL MAKING A VIDEO WITH THE PENNSYLVANIA PRISON SOCIETY IN 1988 OR 1989 ABOUT COMMUTATION. GOVERNOR SHAPP WAS RELEASING PEOPLE. IT WAS THE HIGHEST RATE OF COMMUTED SENTENCES IN PENNSYLVANIA. PEOPLE WERE GETTING OUT IN 12-15 YEARS. I LEARNED A LOT ABOUT THAT. WE HAD HOPE THROUGH COMMUTATION.

WE INVITED THE LIEUTENANT GOVERNOR INTO THE INSTITUTION TO SPEAK ABOUT THAT. I HAD IMMERSSED MYSELF IN ORGANIZATIONS IN THE PRISON. THEY DIDN'T EXIST; WE HAD TO BUILD THEM FROM THE GROUND UP. AT THAT TIME, THERE WAS BIAS AGAINST LIFERS. THEY DIDN'T LET US INTO PROGRAMS BECAUSE WE WEREN'T EXPECTED TO GAIN ANYTHING FROM THEM. WE BUILT THESE ORGANIZATIONS FOR OURSELVES, SO WE COULD SEE OUR FAMILIES AND SO WE COULD

INTERACT WITH THE PUBLIC. WE WANTED TO LET THEM KNOW THAT WE WERE HERE—WE WERE CIVILIZED PEOPLE WHO WERE ROTTING AWAY IN PRISON.

I HAD ESTABLISHED A RELATIONSHIP WITH THE PRISON SOCIETY. I WAS A PART OF THEIR VIDEO ABOUT COMMUTATION. I SAID ON VIDEO, “I WILL NEVER UNDERSTAND HOW THEY CAN TAKE SO MANY YOUNG PEOPLE AND THROW US AWAY FOREVER WITHOUT GIVING US A CHANCE TO GROW.” THIS WAS IN THE 1980S, LONG BEFORE THEY STARTED TALKING ABOUT THE JUVENILE MIND. KIDS ARE NOT FINISHED PRODUCTS. ADULTS ARE NOT FINISHED PRODUCTS. THE MINDSET THAT WE CAN THROW THEM AWAY FOREVER BECAUSE THEY WOULDN’T AMOUNT TO ANYTHING IS BECAUSE WE DON’T GIVE THEM A CHANCE.

THERE ARE SO MANY MORE PEOPLE WHO I LEFT BEHIND WHO WERE JUST AS DESERVING OF A CHANCE AT PAROLE. THERE WERE SOME WHO WERE ONLY 18 AT THEIR ARREST WHO HAVE BEEN IN THERE AS LONG AS WE HAVE. THERE ARE PEOPLE WHO WERE THE PIONEERS, THOSE WHO MENTORED US AND TAUGHT US HOW TO BEHAVE IN THE PRISON ENVIRONMENT. THEY ARE NOW OLD MEN. WE (JUVENILE LIFERS) CAME OUT ON PAROLE IN OUR EARLY 50S OR 60S, AFTER DOING 40 YEARS. WE ARE ALL GROWN MEN. BUT OUR MENTORS ARE NOW IN THEIR 70S AND OLDER, AND THEY HAVE BEEN INCARCERATED FOR OVER 50 YEARS. THESE ARE MEN WHO REALLY CHANGED THEIR LIVES, THEY TRANSFORMED THE PRISON ENVIRONMENT, AND THEY SHOWED US THE WAY. THEY MADE THE COMMUNITY BETTER AND SHOWED US IT WAS A COMMUNITY. WE WERE GRATEFUL FOR THEM. THEY ARE DESERVING OF A CHANCE AT FREEDOM. THEY ARE OLDER AND INFIRM, HAVE HEALTH ISSUES AND BARELY HOLDING ON. WHY ARE WE KEEPING THEM INCARCERATED?

a. What are some examples of such change?

I STARTED FAMILIARIZING MYSELF WITH THE LAW. I STARTED READING SOME BOOKS. I WASN’T AS SERIOUS AS I WOULD BECOME LATER, BECAUSE THE LEGAL JARGON WAS A FOREIGN LANGUAGE TO ME. THERE WERE CASES, CASE LAW, AND CITATIONS. LIKE MATH, THOSE THINGS ARE CONFUSING TO LOOK AT, BUT SIMPLE TO UNDERSTAND ONCE YOU KNOW THE FORMULA. I APPLIED THAT TO THE LAW—YOU HAVE TO UNDERSTAND THE FORMULA. I STARTED TO GET DOWN THE TECHNICAL TERMINOLOGY, AND THEN I COULD UNDERSTAND THE CONCEPTS.

ONCE I DID THAT, IT BECAME FUN. THE LAW BECAME MY FRIEND, AND I REALLY FELT EMPOWERED. I KNEW THERE WERE A SLEW OF PEOPLE WHO KNEW NOTHING ABOUT THE LAW. THEY COULD HAVE SOME RELIEF TALKING TO SOMEHOW COULD HELP THEM UNDERSTAND.

b. What factors led to change, if any?

BECAUSE WE (LIFERS) WERE DISCRIMINATED AGAINST BY BEING EXCLUDED FROM WHAT WAS HAPPENING, THE WAY I DEALT WITH THAT WAS BY BUILDING LIFERS ORGANIZATIONS. THESE WERE INTERNAL ORGANIZATIONS WITHIN THE PRISON, BUT THEY HELPED US REACH OUT. WE ESTABLISHED A LIAISONSHIP WITH PRISON OFFICIALS WHO HAD CONTROL OVER OUR LIVES. THEY WOULD TELL US NO FOR ANYTHING WE TRIED TO DO, SO WE WOULD RESEARCH PROJECTS. WE LEARNED HOW TO TROUBLESHOOT THE ISSUES, AND TO WRITE IN A POLITE AND PROFESSIONAL WAY TO MAKE THOSE REQUESTS. THE AUTHORITIES RECOGNIZED OUR SKILL LEVEL WHEN READING OUR MEMORANDUMS. THEY GAVE US THAT RESPECT, SO WE STARTED TO WRITE MORE.

WE BUILT ORGANIZATIONS TO INVITE PEOPLE INTO THE PRISONS. WE STARTED TEACHING THESE CLASSES—VIOLENCE PREVENTION, CHARACTER DEVELOPMENT, BATTERERS GROUPS (WITH PRISON STAFF), THINKING FOR A CHANGE. THE *AUSTIN* LITIGATION THAT CHANGED EVERYTHING? THAT CAME FROM ME AND THE ACLU. IT WAS ABOUT BETTER CONDITIONS AND TREATMENT, AS WELL AS TRAINING FOR STAFF. IT WAS FOR THOSE WHO DIDN'T KNOW HOW TO TALK TO US, DEAL WITH US, AND EVEN WHAT TO DO WITH US. YOU NEED TO KNOW THE CULTURE OF THE PEOPLE WHO YOU'RE TALKING TO, AS WELL AS THINGS THAT CAN EXACERBATE THE PROBLEM. THE *AUSTIN* CASE DID A WHOLE SLEW OF THINGS THAT LED TO BETTER TRAINING, BETTER MEDICAL TREATMENT, TB SHOTS, AND BETTER HEALTH. THIS WAS NOT HAPPENING PRIOR TO 1989.

I BECAME A MENTOR—ONE OF THOSE INDIVIDUALS WHO WAS LOOKED TO FOR SOLUTIONS AND ANSWERS. I DEVELOPED A GREATER RESPONSIBILITY BECAUSE I KNEW SOMETHING ABOUT THE LAW. THAT GAVE ME A HIGHER DEGREE OF TRUST, BELIEVABILITY, AND RESPECT THAN THE OTHER PRISONERS. I COULD POINT THEM IN THE RIGHT DIRECTION ABOUT A PROGRAM. SO, WHEN THEY SAW US RUNNING THESE TYPES OF PROGRAMS, IT GAVE US A DEGREE OF HIGHER RESPECT THROUGHOUT OUT THE INSTITUTIONS.

THE STAFF HAD TO LEARN WHAT WE WERE DOING, FROM THE CURRICULUM TO THE PROGRAMS, BECAUSE WE WERE RUNNING EVERYTHING. THEY GOT BETTER, TOO. THEY LEARNED HOW TO TEACH THE PROGRAMS FROM US. INSTEAD OF GETTING RID OF US, THEY KEPT US ON AS PEER ASSISTANTS. WE RAN THE CLASSES. THE CONSCIENTIOUS STAFF MEMBERS LEARNED, AND THEY BECAME VERY GOOD AT WHAT THEY WERE DOING—THEY LEARNED AND BECAME GOOD AT IT BECAUSE THEY SAT DOWN NEXT TO AN INMATE WHO WAS TEACHING AS A PEER.

c. How did the community inside a correctional institution help/hinder positive change?

WE CHANGED THE INSTITUTION. WE CHANGED THE STAFF—THEY FOUND US TO BE INVALUABLE. THEY USED US AT EVERY TURN THAT THEY COULD, AND WE WANTED TO BE USED. IT GAVE US MEANING AND SUBSTANCE TO APPLY OURSELVES TO. THIS IS WHY WE BECAME LEADERS IN THE INSTITUTION. IT WAS FOR THE OTHERS IN THE INSTITUTIONS. OUR HOPE CAME FROM THESE PROGRAMS, FROM HAVING STAFF TREAT US BETTER. WE HAD THE KNOWLEDGE TO KEEP THE COMMUNITY SAFE, AND SO WE WERE VALUABLE. WE WERE MAKING OUR OWN ENVIRONMENT SAFER, CLEANER, MORE ACCEPTABLE.

THEY DIDN'T WANT TO TRANSFER US OUT BECAUSE THE PLACES WE WERE IN COULD THRIVE. WE WERE THE VOICES OF REASON—THE VOICES OF CALM—IN GENERAL POPULATION. IT HAD TO DO WITH INTERACTIONS THAT MADE A PERSON FEEL SAFE. THE STAFF HAD A SAYING, "I'M JUST DOING MY JOB TRYING TO KEEP YOU DOWN." I SAID TO THEM, "IF THIS BLOWS UP IN HERE, YOU'RE IN IT. YOU'RE IN HERE MAKING ENEMIES. YOU'RE IN THE EYE OF THE STORM." THIS WAS THE MENTALITY AND THE ENVIRONMENT WE LIVED IN, AND WOULD STILL BE IN, IF IT WEREN'T FOR THE CALM VOICES AND THOSE BEFORE ME WHO HAD BEEN PIONEERS BLAZING THE TRAIL. THOSE ARE THE CATS WHO I LEARNED FROM.

STAFF ARE TAUGHT THAT THEY ARE IN CONTROL, THAT THEY RUN THIS. THEY MUST MAINTAIN FORCE AT ALL TIMES. YOU NEVER WANT THE PRISONERS TO THINK THAT THEY'RE IN CHARGE. I UNDERSTOOD THAT MINDSET. BUT BY GETTING CLOSE TO STAFF AND TALKING TO THEM, WE WERE ABLE TO GIVE THEM A DIFFERENT PERSPECTIVE AND CHANGE THAT MINDSET.

WE HAD TO CONVINCING THEM THAT THEIR SAFETY WOULD BE AT STAKE IF THEY HAD AN ADVERSARIAL RELATIONSHIP WITH PRISONERS. WE TOLD THEM, "DO YOU WANT TO BE THE STAFF MEMBER WHO THE PRISONERS ARE LOOKING FOR OR WON'T PROTECT?" WE HAD TO CONVINCING THEM THAT THEY DIDN'T HAVE THE RIGHT TO MAKE PEOPLE'S LIVES MISERABLE. THE STAFF HAD THOUGHT IT WAS THEIR DUTY TO PUNISH US FURTHER SINCE THEY KNEW WHAT OUR CRIMES WERE. BUT THEN THEY STARTED REALIZING THAT THE PUNISHMENT WAS ALREADY GIVEN, AND THEY WERE JUST MAKING IT HARD ON THE ENVIRONMENT. WE HELPED THEM REALIZE THAT THIS WAS A COMMUNITY, AND WE HELPED INMATES REALIZE THAT THEY WERE IN A COMMUNITY.

d. How did the community outside a correctional institution help/hinder positive change?

THE COMMUNITY BROUGHT PROGRAMS, EDUCATION, PROFESSORS, PELL GRANTS. THE PROFESSORS CAME WITH THE PELL GRANTS, FROM VILLANOVA AND HARRISBURG AREA COMMUNITY COLLEGE (HACC). WHEN WE GOT THE OPPORTUNITY TO TAKE COLLEGE COURSES, THEY WANTED TO DISCRIMINATE AGAINST LIFERS FOR COURSES, BUT WE GOT AROUND THAT. WE GOT A PERCENTAGE OF LIFERS WHO COULD PARTICIPATE, AND THAT OPENED UP THE WORLD TO US.

THE PROFESSORS FROM VILLANOVA AND HACC STARTED COMING IN AND BROUGHT NEWS OF THE OUTSIDE WORLD. WE COULD BE A PART OF THAT AGAIN. THE DISCUSSIONS AND TOPICS INSIDE THE PRISON STARTED TO GO UP A NOTCH. WE BEGAN HAVING DISCUSSIONS ABOUT THE DIFFICULT THINGS HAPPENING IN THE WORLD, LIKE VIOLENCE IN THE COMMUNITY. WE STARTED TALKING ABOUT IDEAS FOR SOLUTIONS AND THEN THE ELECTED OFFICIALS CAME. THEY SAW SOME OF THE PROGRAMS WE WERE ESTABLISHING IN PRISONS—COMPLETE WITH BYLAWS—AND SAW AN UNTAPPED SOURCE. THEY SAID, “WOW, WHO DID THIS?”

THESE THINGS HELPED CHANGE MORALE AND THE CONCEPT OF THE PRISON ENVIRONMENT. THEY ALLOWED US TO FEEL MORE CIVILIZED. THAT MADE THE ENVIRONMENT BETTER. THE ENVIRONMENT GOT EXPONENTIALLY BETTER. MORE PEOPLE STARTED COMING TO INTERACT WITH OTHER ORGANIZATIONS. IF ONE ORGANIZATION WAS PREPARING FOOD, THEN INMATES COULD SAMPLE FOOD FROM OUTSIDE. IT HELPED YOU FEEL LIKE YOU WEREN'T BEING HELD HOSTAGE; YOU HAD CERTAIN FREEDOMS. YOU COULD THINK ABOUT OUTSIDE OF THE BOX AND COMMUNICATE YOUR MIND.

PEOPLE DON'T REALIZE THAT THE PRISON ENVIRONMENT IS TOXIC. THESE ARE HARD PLACES. RAPE, MURDER, ROBBERY, THEFT—THEY ALL HAPPEN IN THERE. PEOPLE THINK YOU HAVE NOTHING TO WORRY ABOUT, THAT YOU GET A FREE PLACE AND FREE FOOD. BUT THE ENVIRONMENT ITSELF IS TOXIC. NO ONE SIGNS UP TO BE IN AN ENVIRONMENT MADE UP ONLY OF ROBBERS, THIEVES, MURDERS. WE NOW HAD THE IDEA THAT WE COULD RISE ABOVE THAT. WE COULD HAVE SOMETHING BEYOND PRISON. IT WAS DUE TO THE PIONEERS SAYING YOU HAVE TO KEEP HOPE ALIVE, AND THEM TELLING US NOT TO ACT LIKE WE ARE DETACHED FROM THIS. THEY SOUGHT TO IMPROVE THE ENVIRONMENT AND TALK TO THE MEN. WE HAD THOSE FORCES. WE KNEW THAT THIS WAS THE ENVIRONMENT WE ARE IN AND WE HAVE TO MAKE IT THE BEST IT CAN BE.

e. Did you maintain contact with the community while incarcerated?

YES, MY FAMILY. WHEN YOU'RE INCARCERATED, YOUR FAMILY IS TOO, IF THEY LOVE YOU.

f. How did your community or family change after you were sent away?

WELL, MY FAMILY WERE LIVING THEIR LIVES. I FELT THEY SHOULD LIVE THEIR LIVES. THEY DIDN'T OWE ME ANYTHING. THEY STILL LOVED ME, NOT BECAUSE THEY COULD VISIT ME, BUT BECAUSE THEY TOOK MY PHONE CALLS AND ANSWERED MY LETTERS. I DIDN'T WANT THEM TO PUT THEIR LIVES ON HOLD.

THEY'LL DO AS MUCH OF THE TIME WITH YOU AS THEY CAN. BUT FOR THOSE OF WHO DIDN'T HAVE A DATE OF RELEASE, THEY WEREN'T RECEIVING THE INFORMATION AND FEEDBACK THAT ANYTHING WAS GOING TO CHANGE.

I WAS THE BABY OF THE FAMILY, SO THEY GOT OLD AND STARTED TO DIE.

4. What has life been like for you since being paroled?

a. How has the community changed since your release?

WE WENT IN AS KIDS, SO I CAN ONLY TELL YOU WHAT I REMEMBER OF THE COMMUNITY. I LOVED MY COMMUNITY. I THOUGHT MY COMMUNITY WAS BEAUTIFUL, WONDERFUL. MY ONLY PROBLEM WAS SCHOOL. MY COMMUNITY WASN'T VIOLENCE RIDDLED. IT WASN'T EVERY DAY THAT KIDS WERE BEING SHOT.

IT'S A LOT MORE VIOLENT NOW. THERE'S NO VILLAGE ANYMORE. EVERYONE IS TOLD TO MIND THEIR OWN BUSINESS. EVERYONE IS SELF-CENTERED. PEOPLE ARE AT WAR WITH THE POLICE. YOUNG PEOPLE DON'T TRUST THE OLD PEOPLE, AND OLD PEOPLE DON'T TRUST THE YOUNG PEOPLE. THERE IS NO TRUST. EVEN IN ORGANIZATIONS—THERE'S NO WORKING TOGETHER. NO ONE IS CONCERNED ABOUT THE BIG PICTURE.

I NEVER HAD TO PAY BILLS. I HAD NEVER LIVED ON MY OWN. I'VE NEVER HAD A RELATIONSHIP WITH A WOMAN FOR A SIGNIFICANT PERIOD OF TIME. I ONLY INTERACTED WITH WOMEN IN PRISON, AND THEY WERE STAFF. EVERYONE SEEMS TO BE JADED NOW. EVERYONE HAS SOME TRAUMATIC EVENT IN THEIR PAST THAT THEY'RE TRYING TO GET OVER. I DON'T HAVE A CONVERSATION WITH MOST FEMALES. I'M CONSCIOUS ABOUT BEING SENSITIVE. I'M LEARNING TO DEAL WITH THAT.

b. Has violence been a concern due to your release?

MOST DEFINITELY. IT IS A CONCERN OF MINE. GUNS ARE RAMPANT. PEOPLE SEEM TO BE HUNTING ONE ANOTHER LIKE IT'S A SPORT. IT'S AMAZING TO ME HOW RAMPANT THE GUN VIOLENCE IS, AND HOW YOUNG THE PEOPLE ARE INVOLVED. AND IT SEEMS TO BE POOR PEOPLE TAKING FROM POOR PEOPLE—NOTHING MORE DISTURBING THAN THAT.

c. Over the years, the city has tried to address community violence. What have you noticed about these efforts?

THEY ARE DISINGENUOUS. THE PROBLEMS ARE ECONOMICS AND SOCIAL STANDINGS AND STATUS. THEY UNDERSTAND WHAT THE PROBLEMS ARE. IF THEY RAISE THE STANDARD OF LIVING AND HELP PEOPLE EARN A LIVING WAGE, THAT WOULD HELP.

d. What impact have they had on your community?

THERE IS THE OFFICE OF VIOLENCE PREVENTION IN PHILLY. THEY OFFER GRANTS, PEOPLE COMPETE FOR THEM, AND THEN WE DON'T HAVE TO HEAR FROM THEM FOR A COUPLE OF YEARS. WHO'S GOING TO COMPETE FOR THESE \$5,000 GRANTS? THEY'RE NOT THROWING ANY REAL MONEY AT THE PROBLEMS. IF THEY THINK THIS IS IMPORTANT, THEN THEY SHOULD DO SOMETHING ABOUT THE STRUCTURE AND LIFESTYLES OF THE PEOPLE. PUT SOME MONEY BEHIND THE PROBLEM. IF WE DO SOMETHING IN A MEANINGFUL WAY, THEN WE CAN ALL POINT THE FINGER WHEN SOMEONE GOES SOUTH—WE CAN SAY YOU'RE CHOOSING NOT BE A PART OF IT.

THEY OFFER US CRUMBS. \$30,000 IS NO MONEY WHEN THEY HAVE MILLION DOLLAR BUDGETS. THEY NEED TO COME TO GRIPS WITH REALITY. WHAT THEY SHOULD DO IS SAY, "HERE'S 5 MILLION OR 10 MILLION. HERE'S THIS BUILDING, CREATE A CENTER." SO MUCH CAN BE DONE. THE CITY AND GOVERNMENT ARE NOT READY TO DO IT.

e. What do you think creates violence in your community?

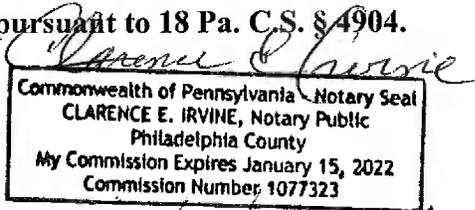
ECONOMICS, AND STATUS OR SOCIAL STANDING.

f. What can be done about it?

MANY ORGANIZATIONS ARE MIMICING ONE ANOTHER. IF THEY WOULD ONLY GIVE MONEY TO ORGANIZATIONS THAT WORK IN CONJUNCTION WITH OTHER ORGANIZATIONS DOING SIMILAR WORK, THAT WOULD START ORGANIZATIONS COMMUNICATING AND WORKING TOGETHER. RIGHT NOW, THEY'RE ENCOURAGING THEM TO FIGHT EACH OTHER RATHER THAN TO WORK

TOGETHER. IF WE'RE WORKING IN THE INTEREST OF REAL SUCCESS, THE PRINCIPLE SHOULD BE STATED AT THE TOP: IN ORDER TO QUALIFY FOR FUNDS, YOU MUST PARTNER WITH 2 OTHERS DOING SIMILAR WORK, AND THEN MAKE THE FUNDS SIGNIFICANT. WE SHOULD BE IN THE BUSINESS OF BRINGING PEOPLE TOGETHER, NOT TEARING THEM APART.

I hereby swear, declare and verify under penalty of perjury, that the facts set forth above are true and correct to the best of my personal knowledge, information and belief pursuant to 18 Pa. C.S. § 4904.




NAME
Steven Austin

Dated: 10/7/2021
Philadelphia, PA

Sworn to and subscribed before me
this 7th day of Oct 2021.

EXHIBIT C

AFFIDAVIT/DECLARATION OF TAMIKA BELL

Pursuant to 18 Pa C.S. §4904

Tamika Bell was 16 years old when she agreed to participate with three adults in a robbery. The robbery went awry, and her adult co-defendant shot and killed the person they were robbing. She was found guilty of felony murder and given the then mandatory sentence of life without parole. She earned her GED when she was 18, passing on her first try. She took and completed prison programs focused on employment and vocational development as well as numerous self-improvement courses. She served as a mentor to other inmates. She was re-sentenced in 2018 and given a new sentence that made her eligible for parole. At her resentencing Judge Lewis hoped that upon release Tamika would demonstrate that she was a “far different, a far better, a much more mature and capable person that will be an asset to the community you return to and will also be an asset to the family that has been supporting you from the very beginning.” Tamika was paroled shortly thereafter, after serving 22 years in prison. She maintained steady relationships with family and friends. She got married. She got a job and she has continued to mentor and help others so that they don’t repeat the mistakes that she made.

I TAMIKA BELL do verify swear that the answers to the below questions are true to the best of my knowledge:

1. Let’s talk about what was going on for you or your loved one before the arrest.

a. What was going on in terms of work or school?

I WAS IN SCHOOL, IN THE 9TH GRADE. BUT I WAS NOT GOING TO SCHOOL ALL THE TIME. I HAD ALREADY GOTTEN KICKED OUT OF MY NORTHEAST HIGHSCHOOL AND WAS GOING TO AN ALTERNATIVE SCHOOL. I STARTED LEARNING BETTER WITH A TEACHER WORKING ONE ON ONE.

AS FAR AS HOME. IT WAS WHAT IT WAS. MY MOM WAS A STRICT CHRISTIAN WOMAN. WE COULD NOT GO OUT OR SOCIALIZE, EXCEPT CHURCH. SO WHEN I FINALLY GOT GET OUT IT WAS EXCITING TO ME.

a. Living at home? Who lived in the house?

I WAS LIVING WITH MY MOM, LITTLE BROTHER, AND LITTLE COUSIN. SHE WAS WITH SOME GUY THEN. ME AND MY MOM DIDN’T HAVE A GOOD RELATIONSHIP, BECAUSE HER PRIOR BOYFRIEND WAS RAPING

ME. WHEN I TURNED 14, SHE CAUGHT HIM ON ME. SHE PUT HIM OUT. SHE ASKED ME ABOUT IT AND I SAID HE DID THIS ALL THE TIME. THAT RUINED OUR RELATIONSHIP. THEN I STARTED GOING OUT AND DOING DRUGS, DRINKING, AND HANGING OUT WITH PEOPLE MUCH OLDER THAN I WAS.

I THOUGHT I KNEW EVERYTHING THEN, EVEN THOUGH I WAS 16 YEARS OLD. LATER, I GOT HELP FOR WHAT HAPPENED TO ME, MY SEXUAL ABUSE, VERBAL ABUSE, MENTAL ABUSE. IT HAPPENED, BUT I'M NOT GOING TO USE THIS AS A CRUTCH. IT STILL CAUSES BIG PROBLEMS WITHIN MY FAMILY.

b. What do you remember about the neighborhood?

IT WAS NORTHEAST PHILLY. IT WAS FULL OF DRUG DEALERS. I HAD TWO FRIENDS. WHEN WE FIRST MOVED TO THAT NEIGHBORHOOD, EVERYONE WAS CAUCASIAN. SO THAT WAS A REAL BIG CHANGE TO ME. I JUST MADE FRIENDS BECAUSE I'D NEVER BEEN TAUGHT THAT YOU'RE NOT SUPPOSED TO LIKE WHITE PEOPLE. I WOULD COME HOME FROM SCHOOL, SOMETIMES DO HOMEWORK AND SOMETIMES NOT, AND GO HANG OUT ON THE CORNER WITH ALL THE DRUG DEALERS. WE WOULD SMOKE WEED, TRY TO GET MONEY FROM PEOPLE.

OVER THE YEARS, MORE BLACK PEOPLE STARTED MOVING IN. IT GOT REAL HOOD REAL FAST.

THEN MY BROTHER GOT LOCKED UP IN JUVENILE PLACEMENT. IT LOOKED COOL TO ME. HE GOT TO RIDE HORSES AND DO OTHER THINGS WE HAD NEVER TRIED. I TOLD MY MOTHER I WANTED TO GO TO PLACEMENT.

I TOLD MY MOM I WANTED TO GO TO JOB CORPS. SHE SAID OK AND WENT DOWN TO THE OFFICE. THEN SHE TOLD ME I DIDN'T GET ACCEPTED.

I DON'T REMEMBER A LOT OF PEOPLE FROM THAT TIME, MOSTLY JUST MY CLOSE FRIENDS AND IMMEDIATE FAMILY.

2. Tell us about the incident that resulted in you or your loved one receiving a life sentence.

a. Where/when did the incident take place?

SO IT WAS IN SEPTEMBER. I ALWAYS HUNG OUT WITH NICOLE, MY CODEFENDANT. SHE WAS A SINGLE MOM SO I THOUGHT IT WAS COOL TO HANG OUT WITH HER. SHE INTRODUCED ME TO TWO GUYS. THEY SAID, LET'S GO STEAL A CAR TOGETHER. WE CAN SELL IT FOR PARTS. THEY BROUGHT OUT SOME WET, WHICH I'D NEVER SMOKED BEFORE. I WAS REALLY OUT OF IT.

THE CRIME HAPPENED AT PENN'S LANDING. WE GOT TO THE CAR, AND MY CO-DEFENDANT SHOT THE GUY IN THE DRIVER'S SEAT. BUT WE DIDN'T KNOW THAT. I TOOK THE JEWELRY FROM THE GIRL SITTING IN THE CAR. I JUST STOOD THERE AND MY CO-DEFENDANT RAN.

EVERYONE FREAKED OUT. MY CO-DEFENDANT DIDN'T KNOW WHY SHE SHOT SOMEONE. I TOLD MY FRIEND AND SHE SAID NIKI WAS GOING TO BLAME EVERYTHING ON ME.

I TOLD MY MOM THAT I WENT TO ROB THE PEOPLE BUT I DIDN'T KNOW THEY WERE GOING TO SHOOT ANYONE. SHE SAID, "LET'S GO DOWN TO THE STATION AND TELL THE POLICE THE TRUTH." MY MOM AND I PRAYED TOGETHER. I THOUGHT I WAS GOING TO GO DOWN AND TELL THEM WHAT HAPPENED AND THEN I WAS GOING TO GO HOME. NONE OF US HAD ANY INTERACTIONS WITH THE POLICE BEFORE. THEY WEREN'T LOOKING FOR ME.

b. What do you remember about you or your loved one's interactions with the police?

I WAS IN THAT ROOM FOR A LONG TIME AND KEPT SAYING THE SAME THING OVER AND OVER AGAIN. THEY DIDN'T BELIEVE ME BECAUSE MY CO-DEFENDANT TOLD THEM THAT I WAS THE SHOOTER. THEY KEPT SAYING I WAS LYING. I WAS SO TIRED AND I WAS READY TO SAY I SHOT HIM. I ADMITTED TO THE ROBBERY BUT NOT TO THE SHOOTING. THEN AFTER THAT, THEY TOLD ME I HAD TO STAY THERE. I SAID, "WHY?" I DIDN'T UNDERSTAND WHY I HAD TO STAY.

c. What do you remember about you or your loved one's interactions with your lawyer?

DAN WAS AN AWESOME LAWYER. HE KNEW YOUNG PEOPLE LINGO TALK. HE MADE ME FEEL COMFORTABLE, BUT I STILL DIDN'T UNDERSTAND HALF OF WHAT HE SAID TO ME. I REALLY STILL THOUGHT I WAS GOING TO COME HOME.

LIKE ONE TIME, WHEN I WAS AT ASD (WHERE THEY KEPT THE JUVENILES), WE USED TO GO OUT TO THE YARD, SO ACROSS THE WAY WAS THE MEN. SO US BEING KIDS, WE USED TO SEND LETTERS TO THEM. WE WOULD GET PAPER AND SOAP AND MAKE NOTES. BUT THEY TOLD US IF WE KEPT DOING THAT, WE WOULDN'T GET OUR REC TIME. SO ONE DAY, A NOTE GOT LEFT OUTSIDE THE GATE. WE DIDN'T KNOW WHAT TO DO. I ENDED UP CLIMBING OVER THE FENCE TO GET THE NOTE. I CLIMBED OUTSIDE THE FENCE. INSTEAD OF TRYING TO ESCAPE, I CLIMBED BACK INSIDE TO THE PRISON. ALL I CARED ABOUT WAS GETTING MY REC TIME. THAT'S WHERE MY MINDSET WAS.

I DIDN'T UNDERSTAND WHAT CAPITAL CASE MEANT. HONESTLY, I DIDN'T GET THE GIST OF ME BEING A PART OF TAKING SOMEONE'S LIFE UNTIL I WENT INTO THE HOUSE HOPE PROGRAM (AT MUNCY). THAT'S WHERE I REALLY LEARNED ABOUT WHO TAMIKA BELL WAS. IT TAUGHT ME WHAT THE TRAUMA HAD DONE TO ME. IT IS PARTLY RUN BY WOMEN WHO ARE INCARCERATED.

d. What do you remember about you or your loved one's interactions with the prosecutor?

NO. I JUST KNEW SHE WAS A WOMAN.

e. What do you remember about you or your loved one's interactions with the judge?

NOTHING.

f. Did the system work the way you expected?

NO. WHEN I GOT SENTENCED, KELLY SAID, "WE WERE ALL THERE IN COURT. WHEN HE TOLD YOU HAD A LIFE SENTENCE, YOU JUST STOOD THERE." THAT'S BECAUSE I WAS ON PSYCH MEDS (THAT THE JAIL HAD GIVEN ME).

I REMEMBER GOING TO COURT TO GET DECERTIFIED. I REMEMBER THEM BEING SO SURE WE DID ANOTHER ROBBERY THAT HAD HARMED SOMEBODY. BUT THEN THE LADY CHANGED HER STORY AND SAID THAT SHE WAS NOT SURE I ROBBED HER. I THINK THIS OTHER CASE THAT I WAS NOT PART OF, WAS THE REAL REASON WHY MY CASE DID NOT GO BACK TO JUVENILE COURT. I HAD NEVER HAD ANY CONTACT WITH POLICE OR THE SYSTEM UNTIL THIS ARREST.

3. How did you/someone you know personally change since being sentenced to life?

I DIDN'T REALIZE I WAS GOING TO SERVE LIFE UNTIL I GOT MY LAST APPEAL DENIED. THE LIFERS AROUND ME SAID, "THAT'S IT. YOU ARE NOT GOING TO GET OUT."

I STOPPED DOING EVERYTHING, GOING TO CHURCH, GOING TO MEALS, FOR LIKE A MONTH. A CHAPLAIN CAME OVER AND CALLED ME TO HER OFFICE. SHE SAID, "YOU HAVE BEEN SAYING YOU HAVE A STRONG BELIEF IN GOD. IF YOU'RE GOING TO SAY IT, THEN YOU HAVE TO BELIEVE IT." I SAT DOWN AND SAID, IF I'M GOING TO STAY HERE FOR THE REST OF MY LIFE, I'M GOING TO MAKE THE BEST OF IT.

SHE SAID, "UNLOAD THESE BOXES." I FOUND A NEW DRUM SET BECAUSE SHE KNEW I LIKED TO PLAY THE DRUMS.

a. What are some examples of such change?

I STOPPED FIGHTING AND CUSSING PEOPLE OUT. I STOPPED BEING A BUTTHOLE TO PEOPLE. I WAS VERY ANGRY WHEN I WENT TO PRISON. WHEN I WENT INTO HOUSEHOPE, I WAS ABLE TO RELEASE THAT ANGER. I CHOSE TO FORGIVE MY CO-DEFENDANT AND CHOSE TO FORGIVE MYSELF.

I STOPPED BEING BAD AND GETTING WRITE UPS. THAT'S WHEN I GOT INTO THE PUPPY PROGRAM. THEY WERE VERY CHOOSY AND PICKY ABOUT WHO GETS INTO THE PROGRAM. THEY WERE SURPRISED WHEN I APPLIED. BUT I STAYED OUT OF TROUBLE AND I WAS IN THAT PROGRAM FOR LIKE 7 YEARS.

b. What factors led to change, if any?

THE PROFESSIONALS IN THERE THAT WE HAD TO TALK TO. THEY HELPED CHANGE YOUR THINKING AND YOUR MINDSET AND GIVE YOU THE TOOLS YOU NEED TO COPE, DEALING WITH TRAUMA. MOST OF THE OTHER LADIES IN THERE HAD ALSO EXPERIENCED TRAUMA.

THERE WAS A LIFER ORGANIZATION BUT THEY DIDN'T LET US MEET A LOT. WE WERE ONLY ALLOWED TO MEET AT CERTAIN TIMES.

PEACHIE USED TO TELL ME TO BE GOOD, GO TO PROGRAMS. BUT IT WASN'T UNTIL I DID THE HOUSE OF HOPE PROGRAM AND THE DRUMSET THAT I WAS ABLE TO CHANGE.

c. How did the community inside a correctional institution help/hinder positive change?

BEING A LIFER AT MUNCY, WE COULDN'T GET IN A LOT OF PROGRAMS. I THINK THAT HINDERED ME AND OTHER PEOPLE WHO WANTED TO DO THOSE PROGRAMS. THEY DIDN'T THINK WE NEEDED THEM SINCE WE WERE NEVER GOING HOME.

THEY CHANGED THE POLICY THAT ONLY 10% COULD BE LIFERS IN ANY ONE PROGRAM.

I PLAYED A LOT OF SPORTS. EVEN THOUGH I HAD A LIFE SENTENCE, I WASN'T ANGRY. I LOOKED OUT FOR PEOPLE. I WASN'T ANGRY. I GUESS MY FAITH IN GOD WAS STRONG, I DIDN'T THINK THAT WAS IT FOR ME. THEY SAID, I DIDN'T ACT LIKE A LIFER. I SHARED MY SPACE AND PROPERTY IN PRISON. THAT WAS DIFFERENT THAN HOW OTHER LIFERS ACTED.

I HAD THAT MINDSET THAT EVERYBODY WAS GOING THROUGH SOMETHING, SO WHY MAKE THEIR LIFE MORE MISERABLE?

d. How did the community outside a correctional institution help/hinder positive change?

EVER SINCE 4TH OF JULY HAPPENED, I HAD NOT BEEN IN TOUCH WITH MY MOM. I FELT LIKE SHE MADE HER CHOICE. SHE TOOK MONEY THAT I'D GOTTEN FOR A LAWSUIT. SHE SPENT IT ALL ON HERSELF.

A COUPLE OF TIMES SHE CAME TO SEE ME HERE AND THERE, BUT IT WAS JUST HERE AND THERE.

e. Did you/they maintain contact with the community while incarcerated?

I KEPT IN CONTACT WITH PEOPLE RANDOMLY IN MY FAMILY. MY FAMILY WASN'T REALLY THERE UNTIL THEY HEARD I WAS COMING HOME. OTHER THAN THAT, IT WAS JUST SPORADIC VISITS.

f. How did your community change after you or your loved one was sent away?

MY STEP-SISTER ALL THESE YEARS WAS HOLDING ON TO WHAT HAPPENED TO ME WITH HER DAD. BUT I HAD LET GO OF IT THROUGH THERAPY. I AM STILL IN THERAPY.

MY OLDEST BROTHER STARTED GETTING INTO A LOT OF TROUBLE AFTER I WAS SENT AWAY. IT WAS LIKE A SNOWBALL EFFECT. I GOT LOCKED UP, MY BOYFRIEND GOT LOCKED UP. PEOPLE WERE GETTING KILLED OR LOCKED UP.

I CHALK IT UP TO LIFE, I GUESS. THAT'S THE TYPE OF ENVIRONMENT THEY GREW UP IN SO THEY DID WHAT THEY KNEW.

4. What has life been like for you/someone you know since being paroled?

a. Have there been any positive or negative interactions with the community?

I'VE WORKED WITH YSRP. I TALKED TO A YOUNG GIRL WHO WAS SENTENCED TO JUVENILE LIFE UNTIL SHE WAS 21. THEY THOUGHT IT WOULD BE GOOD FOR ME TO TALK TO HER. I WAS ABLE TO EXPLAIN TO HER WHAT SHE WAS GOING TO GO THROUGH. SHE IS NORMALLY QUIET, BUT SHE REALLY OPENED UP TO ME. I JUST VIBED WITH HER.

I FEEL LIKE THAT'S MY CALLING, TO TALK, TO SPEAK. TO EXPLAIN TO PEOPLE HOW TO GET THROUGH.

b. How has the community changed since your/their release?

IT GOT MUCH WORSE. I SEE A LOT OF YOUNGER PEOPLE STRUNG OUT ON DRUGS. IT GOT WORSE. PEOPLE GOT MORE SELFISH, TO THEMSELVES. LIKE I'M NOT GOING TO WORRY ABOUT MY NEIGHBOR.

c. Has violence been a concern due to your/their release?

NO.

d. Over the years, the city has tried to address community violence. What have you noticed about these efforts?

I'VE NOTICED THAT IT'S NOT DOING NOTHING TO CHANGE NOBODY. I THINK THESE KIDS TODAY NEED ACTIVITIES, OUTLETS, INSTEAD OF GOING TO THE CORNER TO SELL DRUGS. I REALLY BELIEVE THAT'S WHAT NEEDS TO HAPPEN, A LOT MORE FACILITIES FOR KIDS TO GO BE KIDS.

e. What do you think creates violence in your community?

IT ALL STARTS IN THE HOUSEHOLD. KIDS HAVE DIFFERENT NEEDS AND A LOT OF PARENTS TEND TO TREAT THEIR KIDS ACROSS THE BOARD, THE SAME.

I hereby swear, declare and verify under penalty of perjury, that the facts set forth above are true and correct to the best of my personal knowledge, information and belief pursuant to 18 Pa. C.S. § 4904.

Dated: 10/7/2021

Philadelphia, PA

Clarence E. Irvine
Sworn to and subscribed before me
this 7th day of Oct. 2021.

Tamika Bell
NAME
Tamika Bell

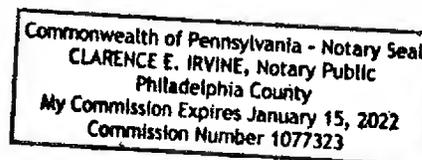


EXHIBIT D

AFFIDAVIT/DECLARATION OF JOHN PACE

Pursuant to 18 Pa C.S. §4904

John Pace was born and raised in West Philadelphia by a single mother raising 11 children. He was incarcerated at the age of 17 and sentenced to Life Without Parole in Pennsylvania. After juvenile LWOP sentences were found to be unconstitutional, John was resentenced and released in February of 2017 after spending 31 years in prison. During his incarceration, John was a certified paralegal, member of the Para Professional Law Clinic at SCI Graterford, on the management team of the Prison Literacy Project, Chairman of the Juvenile Lifer Committee at SCI Graterford, and a Think Tank member and instructor for the Temple Inside-Out Prison Exchange. He also earned his Associate degree and Bachelor's degree from Villanova University, with minors in Sociology and Criminal Justice. Since returning home, he has continued to be a leader in supporting others, and he currently works as the Reentry Coordinator at the Youth Sentencing & Reentry Project in Philadelphia and Program Associate at Temple University Inside-Out Center.

I JOHN PACE do verify swear that the answers to the below questions are true to the best of my knowledge:

1. Let's talk about what was going on for you before your arrest?

I WAS A CONFUSED YOUNG MAN. I GREW UP IN WEST PHILADELPHIA, WITH A SINGLE MOTHER RAISING ELEVEN CHILDREN. I WAS ONE OF THE YOUNGEST CHILDREN WITH ONLY TWO SIBLINGS YOUNGER THAN ME. THEY WERE TWINS, A BOY AND A GIRL. WHEN I WAS YOUNGER, I WANTED TO BE A FOOTBALL PLAYER OR A POLICE OFFICER. I ENJOYED PLAYING SPORTS WITH MY FRIENDS; I USED TO ALWAYS GO OUT AND PLAY FOOTBALL WITH THEM. AS A I STARTED GETTING OLDER, MY CURIOSITY BEGAN TO PEAK. I STARTED VENTURING OUT FURTHER AND STARTED SEEING MORE IN THE COMMUNITY. I WOULD SEE INDIVIDUALS IN GRADES AHEAD OF ME AND WHAT THEY WERE UP TO. SOME WERE GETTING HIGH AND DRESSING NICE, AND THEY WERE INVOLVED IN NEGATIVE THINGS, AND MY CURIOSITY STARTED DRIFTING IN THAT DIRECTION.

THIS WAS THE BEGINNING OF MY MAKING BAD DECISIONS. IT ALL STARTED WITH ME JUST WANTING TO GET HIGH. I THOUGHT THAT WAS COOL. THEN I PUT AN EARRING IN MY EAR. I THOUGHT THAT WAS

COOL, TOO. I WANTED TO BE IDENTIFIED AS ONE OF THE COOL GUYS. EVEN THOUGH I STARTED OUT BEING CURIOUS ABOUT THESE THINGS WHEN I WAS 13, THERE WAS A LONGER SPAN BEFORE I ACTUALLY GOT INVOLVED IN ANYTHING NEGATIVE. I REMEMBER HANGING AROUND A FRIEND WHO I USED TO PLAY SPORTS WITH. HE HAD A NEPHEW WHO WAS OLDER THAN US, AND HE WAS ONE OF THE COOL GUYS. HE INTRODUCED US TO "SYRUP". PEOPLE DRINK IT, AND IT GETS YOU HIGH. I REMEMBER HIM INTRODUCING US TO THAT.

HE THEN WOULD TAKE US OUT WITH HIM. HE TOOK US OUT TO COMMIT A ROBBERY. WE WEREN'T GOING TO SAY NO TO HIM, BECAUSE WE LOOKED UP TO HIM. THAT WAS THE FIRST TIME I RECALL MAKING A BAD DECISION. THE PATTERN WAS THAT I WOULD GET HIGH, THEN AS A RESULT OF BEING HIGH, I WOULD FEEL A FALSE SENSE OF COURAGE TO ROB PEOPLE TO GET THOSE NICE CLOTHES AND THINGS I LIKED. I REALLY LOOKED UP TO THIS GUY. HE EVENTUALLY GOT LOCKED UP... BUT THE PATTERN HAD ALREADY STARTED FOR ME: OF RUNNING OUT, GETTING HIGH, AND ATTEMPTING TO ROB SOMEONE. THE NORM WAS GETTING HIGH, AND THEN ATTEMPTING TO ROB PEOPLE. THIS WAS PREVALENT AROUND ME.

I THEN REMEMBER MEETING THIS YOUNG LADY. WE GOT INTO A DEEP AND EMOTIONAL RELATIONSHIP. I HAD A FALSE WAY OF LOOKING AT RELATIONSHIPS WHERE WE OBJECTIFIED WOMEN AND THAT WAS THE WAY IN WHICH WE ALL SAW RELATIONSHIPS. MEETING HER CREATED A DEEP EMOTIONAL CONFLICT WITHIN MYSELF ABOUT WHAT I WAS DOING AND HOW I FELT WITH HER VERSUS HOW I WAS TOLD TO SEE RELATIONSHIPS. NEVERTHELESS, I WOULD SUPPRESS THOSE FEELINGS AND THOUGHTS BECAUSE I HAD TO BE AROUND MY FRIENDS. I STRUGGLED WITH THOSE FEELINGS. I REMEMBER THE NIGHT OF MY CRIME. I REMEMBER GOING THROUGH ALL THESE FEELINGS. I FELT LIKE I DIDN'T HAVE ANYONE TO TALK TO AND I WAS TOO WORRIED ABOUT IMPRESSING PEOPLE, GETTING HIGH, HAVING NICE CLOTHES, AND LOOKING GOOD FOR GIRLS. IT WAS A SHORT-LIVED CRIMINAL LIFESTYLE.

a. What was going on in terms of work or school?

I WAS STILL GOING TO SCHOOL. I MADE IT STRAIGHT THROUGH NINTH GRADE TO TENTH GRADE. TENTH GRADE WAS WHERE IT WENT BAD,

AROUND WHEN I WAS 16 OR 17. I WASN'T PAYING ATTENTION AND I BARELY WENT TO SCHOOL. I GOT LEFT BACK (KICKED OUT) OF SCHOOL, THEY CALLED MY MOM AND SAID THAT SHE HAD TO BRING ME BACK IF I WANTED TO GET BACK INTO SCHOOL, AND THEN I GOT LOCKED UP A FEW MONTHS LATER THAT YEAR.

I ALSO REMEMBER TRYING TO GET A SUMMER JOB AT THE UNIVERSITY OF PENNSYLVANIA. I EVENTUALLY GOT A SUMMER JOB THERE IN DISHWASHING, BUT I STILL STAYED UP LATE TO HANG OUT WITH MY FRIENDS, AND THEN I WOULD MISS WORK. I WAS WORRYING ABOUT IMPRESSING PEOPLE WITH NICE CLOTHES, MEETING GIRLS, AND GETTING HIGH. I HAD ONE FOOT IN AND ONE FOOT OUT OF THE LIFESTYLE.

b. Living at home?

I WAS LIVING AT HOME WITH MY MOTHER.

c. Who lived in the house?

I WAS ONE OF 11 KIDS, AND MOST OF MY OLDER SIBLINGS HAD MOVED OUT, BUT 5-6 OF US STILL LIVED WITH OUR MOTHER. I WAS ONE OF THE YOUNGEST. THE TWINS, MY BROTHER AND SISTER, WERE YOUNGER THAN ME.

I GIVE MY MOM CREDIT THAT AS A SINGLE MOTHER SHE STILL TRIED TO TAKE CARE OF US. BUT IT'S A CHALLENGE TO RAISE 11 CHILDREN, AND SHE WORKED A LOT. SHE WASN'T HOME A LOT OF THE TIME WHEN I WOULD COME HOME FROM SCHOOL, SO THAT PROVIDED ME WITH THE TIME TO DRIFT OUT ONTO THE STREET WHEN SHE WASN'T HOME AND RUN AROUND IN DIFFERENT NEIGHBORHOODS AND GET INTO TROUBLE.

d. What do you remember about the neighborhood?

I WOULD DESCRIBE US, MY FAMILY, AS NOMADS. WE MOVED AROUND A LOT, ALL OVER WEST PHILADELPHIA. THE LONGEST PERIOD OF TIME WE STAYED IN ONE HOUSE WAS PROBABLY LIKE 3 YEARS. I GREW UP IN ONE NEIGHBORHOOD FROM 3 TO 7 YEARS OLD, AND I OFTEN WENT BACK TO THAT NEIGHBORHOOD. IT WAS THE AREA AROUND 60TH AND

MARKET STREET. I ALWAYS WENT BACK TO HANG OUT THERE, EVEN IF I WAS LIVING SOMEWHERE ELSE IN WEST PHILADELPHIA OR SOUTHWEST PHILADELPHIA. THERE IS A LOT OF ACTIVITY ON 60TH STREET, IN THAT AREA. THERE'S A LOT OF NEGATIVE ACTIVITY, TOO. IT'S NOT ONE OF THE WORST, BUT THERE ARE NEGATIVE ELEMENTS THAT EXIST THERE.

2. Tell us about the incident that resulted in you receiving a life sentence?

LIKE I SAID, THERE WAS A PATTERN. THE PATTERN STARTED WITH ME HANGING OUT WITH MY FRIENDS AND THEN BEING INTRODUCED TO GETTING HIGH. THIS WAS THE PART OF ME TRYING NOT TO DO DEAL WITH WHO I REALLY WAS AND TRYING TO MASK MY FEELINGS. MY PATTERN WAS TO WAKE UP AND GO TO MY FRIEND'S HOUSE, WHERE WE WOULD SMOKE MARIJUANA AND DRINK BEER THROUGHOUT THE DAY. WE WOULD ALSO SOMETIMES TAKE BARBITURATES, LIKE VALIUM, THAT PROVIDED ME WITH A CERTAIN LEVEL OF CALMNESS AND CONFIDENCE. I WOULD FEEL NERVOUS BECAUSE OF SOME OF THE THINGS OUT ON THE STREET, AND THE VALIUMS PROVIDED ME WITH THE CALMNESS TO DEAL WITH THEM.

I REMEMBER THAT PARTICULAR NIGHT. I WAS AT MY FRIEND'S HOUSE, AND IT WAS LATE AT NIGHT, AROUND 2-3 IN THE MORNING. I HAD BEEN SMOKING AND DRINKING ALL DAY, AND I ALSO HAD VALIUMS IN MY SYSTEM. ON THE WAY HOME, I ENCOUNTERED AN OLDER GENTLEMAN. IT WAS PART OF THE PATTERN— TO THINK YOU CAN GET AWAY WITH THINGS— AND SO I ATTEMPTED TO ROB HIM AND I DID NOT MEAN TO HURT HIM.

I WAS SO HIGH THAT WHEN A POLICE OFFICER CAME UP TO ME, I DIDN'T RUN. I JUST STOOD THERE. HE ARRESTED ME, AND HE HIT ME ACROSS MY KNEES WITH HIS BLACKJACK. WHEN HE TOOK ME TO THE POLICE STATION, ONE OF THEM PUNCHED ME. THEN, ONCE THEY DISCOVERED HOW OLD I WAS, THEY CALLED MY MOTHER. ONE OF THEM TOLD MY MOTHER THAT I NEEDED HELP BECAUSE I WAS SO INTOXICATED.

I WAS CHARGED WITH AGGRAVATED ASSAULT, ROBBERY, AND POSSESSION OF AN INSTRUMENT OF CRIME. THIS WAS THE FIRST TIME I WAS ARRESTED FOR A SERIOUS CHARGE OF THIS NATURE AND SPENT

TIME IN A FACILITY. THEY TOOK ME TO THE YOUTH STUDY CENTER. I IMMEDIATELY RECOGNIZED THE SERIOUSNESS OF THE SITUATION. I REMEMBER REALIZING THAT I NEEDED TO DO SOMETHING DIFFERENT THAN WHAT I WAS DOING AT THE TIME. I WANTED TO RE-ENROLL IN SCHOOL. I FIGURED THAT THEY WOULD SEND ME TO GLEN MILLS, AND THAT WOULD GIVE ME THE OPPORTUNITY TO GET MYSELF TOGETHER AND RE-ENROLL IN SCHOOL.

BUT 10 DAYS LATER, THE MAN PASSED AWAY. POLICE CAME DOWN TO GET ME FROM THE YOUTH STUDY CENTER AND PUT ME IN A VAN. WHEN THE POLICEMAN TOLD ME THE MAN PASSED AWAY, I STARTED CRYING. THEY TOOK ME TO 8TH AND RACE, AND I WAS CRYING AND CRYING, WAITING FOR MY MOTHER TO COME IN. I WAS FORMALLY CHARGED WITH HOMICIDE.

a. Where did the incident take place?

IT TOOK PLACE IN 1985, AT 53RD AND MARKET IN WEST PHILLY.

b. What do you remember about your interactions with the police?

I DIDN'T THINK OF THE POLICE IN ANY PARTICULAR WAY BACK THEN, EXCEPT THAT YOU WOULD RUN WHEN YOU SAW THEM. THEY USED TO COME AROUND, HARASS YOU, AND SEARCH YOUR POCKETS.

I HAD NEVER BEEN HIT BY POLICE BEFORE. HOWEVER, ON THAT NIGHT, ONE HIT ME WITH A BLACKJACK ON THE KNEECAP. THE OTHER ONE PUNCHED ME WHEN I GOT TO THE STATION. BUT THAT WAS ALL BEFORE THEY FOUND OUT HOW OLD I WAS.

I DIDN'T THINK ABOUT IT UNTIL LATER. WHEN THE POLICE OFFICER WAS PUNCHING ME, I SAID TO HIM, "I DIDN'T MEAN FOR THIS TO HAPPEN, I WAS JUST TRYING TO GET SOME MONEY." LATER, THEY SAID I HAD MADE THIS STATEMENT TO A DETECTIVE, BUT THAT WASN'T TRUE. THE STATEMENT WAS MADE PRIOR TO THEM LEARNING THAT I WAS UNDER 18, WITHOUT THE PRESENCE OF MY MOTHER, SO THEY CHANGED IT LATER SO THAT THEY COULD USE IT.

THAT STATEMENT BECAME THE BASIS OF THE EVIDENCE. THE POLICE OFFICER HAD THOUGHT IT WAS A FISTFIGHT, NOT A ROBBERY, AND

THEY SAID IT LOOKED LIKE A FISTFIGHT. THE ONLY THING THEY HAD WAS MY STATEMENT. THE VICTIM NEVER GOT TO SAY ANYTHING. IT WAS MY STATEMENT THAT MADE IT FELONY MURDER. THAT WAS THE ONLY EVIDENCE THEY HAD, AND THEY TOOK IT ILLEGALLY WITHOUT MY MOM PRESENT. MAYBE THEY WOULD HAVE CHARGED ME WITH THIRD DEGREE MURDER OR USED THAT STATEMENT FOR NEGOTIATION— I DIDN'T KNOW WHAT HAPPENED.

c. What do you remember about your interactions with your lawyer?

I BARELY SAW THE (COURT APPOINTED) LAWYER. THE ONLY TIME I SAW HER WAS WHEN I WAS IN COURT, AND SHE NEVER CAME TO SEE ME. AS A YOUNG PERSON, I WAS STILL IN DENIAL THAT THIS WAS HAPPENING TO ME.

SHE KEPT TELLING ME TO PLEAD GUILTY TO SECOND DEGREE, BUT THERE WAS NO OFFER. THE LAWYER THEN TOLD MY MOTHER AND FATHER THAT IF I PLEADED GUILTY FOR FELONY MURDER, I WOULD ONLY BE IN FOR 10-15 YEARS. I HAD REMORSE, I WAS READY TO PLEAD GUILTY, AND I HAD AN UNDERSTANDING OF WHAT 10-15 YEARS MEANT.

IT ALL HAPPENED IN ONE DAY. THERE WAS A DECERTIFICATION HEARING. MY LAWYER ARGUED DECERTIFICATION. THE ONLY EVIDENCE THAT SHE PRESENTED TO THE JUDGE WAS WHAT I HAD TOLD HER, WHICH WAS BASICALLY HOW I WAS DOING IN SCHOOL AT THE YOUTH STUDY CENTER. THERE WAS A GOOD REPORT FROM THE YOUTH STUDY CENTER TEACHER. THE LAWYER PRESENTED NO BACKGROUND OF ME GROWING UP, NO CIRCUMSTANCES FOR MITIGATION, NO PROFESSIONALS TO TESTIFY THAT I WOULD BE AMENABLE TO TREATMENT IN A JUVENILE FACILITY. ONLY THAT SHE HAD MET ME.

THE JUDGE DENIED DECERTIFICATION. I PLEADED GUILTY TO SECOND DEGREE WITH THE UNDERSTANDING THAT I WOULD BE DOING 10-15 YEARS IN PRISON. THIS IS WHAT I BELIEVED. THE JUDGE KEPT ASKING ME IF I UNDERSTOOD, AND I SAID I DID, BUT I DIDN'T. ONCE I ARRIVED BACK AT THE YOUTH STUDY CENTER, I TOLD ONE OF THE GUARDS THAT I'D PLED GUILTY TO FELONY MURDER AND WAS GIVEN LIFE, BUT I WOULD ONLY DO 10-15 YEARS. HE SAID "NO! THAT'S A LIFE

SENTENCE!" I TOLD HIM, " THAT'S NOT WHAT MY LAWYER SAID." I DIDN'T UNDERSTAND THAT A LIFE SENTENCE MEANS A LIFE SENTENCE IN PENNSYLVANIA.

I THINK THERE WAS A LOT OF MISCONCEPTION ABOUT WHAT A LIFE SENTENCE MEANT. IN PENNSYLVANIA, COMMUTATION WAS FREQUENTLY USED IN THE 70S. MANY PEOPLE WERE GETTING COMMUTED AT THAT TIME IN 10-15 YEARS. MANY YEARS LATER, I WROTE TO MY LAWYER AND ASKED HER IF SHE'D BE WILLING TO ACKNOWLEDGE THAT SHE GAVE ME MISINFORMATION. SHE NEVER RESPONDED TO MY LETTER DIRECTLY, AND INSTEAD CALLED MY YOUNGER BROTHER.

I FILED FOR INEFFECTIVE COUNSEL. I GOT A NEW PCRA LAWYER, AND I WAS GRANTED AN EVIDENTIARY HEARING. BUT THEN THERE WAS A PROBLEM AT THE PRISON, AND AFTER THAT, THEY COULD NOT FIND ANYTHING. MY PCRA LAWYER COULD NOT FIND THE RECORD THAT I WAS GRANTED AN EVIDENTIARY HEARING. I WAS ABLE TO GET THE RECORD FROM THE COURT.

WHEN THE HEARING TOOK PLACE, THE PCRA ATTORNEY NEVER SUBPOENAED THE DEFENSE ATTORNEY TO TESTIFY, SO ONLY I TESTIFIED ABOUT WHAT HAPPENED. HE SAID THAT HE DID NOT REALIZE THAT IT WAS AN EVIDENTIARY HEARING, SO I LOST THAT PCRA. I TRIED TO FILE INEFFECTIVE COUNSEL FOR HIM, AND I ASKED MY EARLIER LAWYER IF SHE WOULD FILE AN AFFIDAVIT ABOUT THE MISINFORMATION SHE PROVIDED. BUT THE JUDGE DENIED MY PETITION ON THE MERITS. SUBSEQUENTLY, THE LAW CHANGED AND SAID THAT I WAS ALLOWED TO ONLY FILE ONE PCRA, AND THEREFORE MY PETITION SHOULD BE DENIED. I APPEALED THAT DECISION, AND MY CASE ULTIMATELY MADE IT TO THE SUPREME COURT, BUT IT GOT DENIED.

d. What do you remember about your interactions with the prosecutor?

I LOOKED UP THE ROLE OF THE PROSECUTOR LATER. I REMEMBER THE PROSECUTOR I HAD. IT DIDN'T SEEM LIKE THERE WAS ANYTHING UNIQUE THAT HE WAS POINTING OUT ABOUT ME BEING BAD. BUT THE HEARING WENT BY VERY FAST. IT WASN'T MUCH OF A HEARING. THE JUDGE IMPOSED A MANDATORY LIFE SENTENCE BECAUSE MY

ATTORNEY HAD ME PLEAD GUILTY TO SECOND DEGREE HOMICIDE. IT WENT SO FAST: I GOT CHARGED, PLED GUILTY, ENDED UP IN STATE PRISON. IT SEEMS LIKE A FLASH FOR ME. I UNDERSTOOD BETTER LATER ON, AND I HAD MORE DEALINGS WITH PROSECUTORS DURING THE APPEALS PROCESS.

e. What do you remember about your interactions with the judge?

THE JUDGE DENIED THE MOTION FOR DECERTIFICATION. I PLED TO SECOND DEGREE. I HAD A JUDGE WHO ACTUALLY STATED THAT IF YOU PLEAD GUILTY OR GO TO TRIAL AND GET FOUND GUILTY, YOU GET THE SAME THING. HE KEPT ASKING IF THAT WAS CLEAR—IT WASN'T. HE WAS SIGNALING TO ME. I DIDN'T KNOW WHAT LIFE MEANT. I ONLY UNDERSTOOD WHAT MY LAWYER TOLD ME, AND THAT WAS 10-15 YEARS. THE JUDGE SAID TO ME ON THE RECORD THAT HE TRULY BELIEVED I HADN'T MEANT FOR THIS TO HAPPEN, BUT THIS IS WHAT I HAD PLEADED GUILTY TO.

THAT IS HOW NAÏVE I WAS. I HAD A GOOD RELATIONSHIP WITH GUARDS AT THE YOUTH STUDY CENTER, AND IT WAS THE GUARD WHO TOLD ME I GOT LIFE. HE KNEW I HAD PLED GUILTY TO A LIFE SENTENCE, AND I DIDN'T EVEN KNOW THAT. I DIDN'T FIND OUT UNTIL I WAS IN STATE PRISON AND WENT TO THE LAW LIBRARY. CALIFORNIA HAD PAROLE FROM LIFE AT 7 YEARS. A MAN IN PRISON INTRODUCED ME TO SOMEONE WHO HAD LIFE, AND THEN I STUDIED WHAT LIFE MEANT.

f. Did the system work the way you expected?

NO. WHEN YOU'RE THINKING ABOUT JUSTICE: SHOULD I HAVE BEEN HELD ACCOUNTABLE? YES, I SHOULD HAVE BEEN HELD ACCOUNTABLE. BUT IN AN ADVERSARIAL SYSTEM, YOU'RE NOT ON THE SAME PAGE ABOUT WHAT JUSTICE LOOKS LIKE. NO ONE LOOKS AT WHAT THE INDIVIDUAL NEEDS. I SHOULD NOT HAVE GOTTEN SENTENCED TO LIFE WITHOUT PAROLE. IT WOULD HAVE TAKEN ME LESS TIME TO MAKE THOSE CORRECTIONS AND BE HELD ACCOUNTABLE. I SERVED 31 YEARS. BUT A LOT OF US GOT FAILED BY THE SYSTEM.

3. How did you personally change since being sentenced to life?

I THINK I CHANGED BEFORE THE SENTENCE. BEFORE THE GUY PASSED AWAY, IT RESONATED WITH ME BECAUSE OF THE HARM I HAD DONE. I KNEW I WANTED TO CHANGE THEN. IT WAS EVEN MORE DEVASTATING THAT HE PASSED AWAY. I COULDN'T BELIEVE THAT— THAT I WAS RESPONSIBLE FOR SOMEONE'S LIFE BEING TAKEN. I DID HAVE TO WRESTLE WITH THAT INTERNALLY. HOW COULD I PUT MYSELF IN A SITUATION TO MAKE BETTER DECISIONS, SO THAT THIS NEVER HAPPENED AGAIN? I CONSTANTLY FOCUSED ON THAT, SO THAT I COULD PUT MYSELF IN A BETTER POSITION TO MAKE CHANGES SO THAT IT WOULD NEVER HAPPEN AGAIN. I WOULD SAY, "LET ME DO THESE THINGS TO HELP MYSELF BECOME A BETTER PERSON AND DEVELOP SKILLS." I HAD GOALS FROM THE VERY BEGINNING— GET MY G.E.D., GO TO COLLEGE, GETTING SKILLS TO MAKE BETTER DECISIONS. THEY PROPELLED ME THROUGHOUT MY PRISON TIME. THEN, LATER, I FOCUSED ON HOW I COULD HELP OTHER PEOPLE MAKE BETTER DECISIONS.

a. What are some examples of such change?

ONCE I FOCUSED ON MAKING CHANGES IN MYSELF, THEN I WAS ABLE TO HELP OTHERS. I COMPLETED MY COLLEGE DEGREE. I USED TO BE A PART OF A LITERACY PROGRAM FOR THOSE WHO COULD BARELY READ, EVENTUALLY GOT A G.E.D., AND I HELPED OTHER GUYS COMPLETE COLLEGE DEGREES. I WAS HELPING TO SUPPORT THEM IN THEIR JOURNEY.

I WORKED FOR A PARAPROFESSIONAL LAW CLINIC TO HELP OTHERS WITH THEIR CASES. IT'S EASIER TO BE OBJECTIVE ON SOMEONE ELSE'S CASE.

b. What factors led to change, if any?

IF THERE'S A CORE FACTOR, IT'S TAKING PERSONAL RESPONSIBILITY. THERE'S SOMETHING ABOUT HAVING A SENSE OF WHO YOU ARE AND WHERE YOU WANT TO GO IN LIFE, AND KNOWING YOU CONTROL THAT. I REALIZED THAT MORE THAN COLLEGE, IT WAS ABOUT TAKING RESPONSIBILITY. THAT HELPED ME MAKE THE DECISIONS I MADE TO GO TO COLLEGE, AND TO BE A PART OF ORGANIZATIONS.

I TOOK RESPONSIBILITY EVEN THOUGH I KNOW THERE ARE SYSTEMIC WRONGS IN THE SYSTEM. I STILL TOOK RESPONSIBILITY FOR MY OWN WRONG. THAT HELPED ME MAKE THE CHANGES THAT I MADE.

c. How did the community inside the correctional institution help/hinder positive changes?

THESE COMMUNITIES ARE DIFFERENT. AT THE BEGINNING, I WAS YOUNG AND IMPRESSIONABLE, BUT IT WAS THE IMPETUS TO MY DEVELOPMENT. I WAS FORTUNATE TO ENCOUNTER INDIVIDUALS WHO PUT ME ON THE PATH OF WANTING TO LEARN MORE ABOUT MYSELF. PEOPLE WHO WERE INVOLVED WITH ORGANIZATIONS INVESTED IN MY DEVELOPMENT. I GOT THE BENEFIT OF BEING A YOUNG GUY AND BEING TAKEN IN AND GUIDED BY THE OLDER GUYS. THEY PRESENTED A PICTURE OF PERSONAL RESPONSIBILITY, AND THEY HELPED ME DEFINE WHAT PERSONAL RESPONSIBILITY LOOKS LIKE. THERE WAS ONE INDIVIDUAL IN PARTICULAR WHO MODELED THIS. HE HAD A DE FACTO LIFE SENTENCE AND IS STILL INCARCERATED. HE SET ME ON MY LIFE PATH.

I EVENTUALLY GOT TRANSFERRED TO SCI HUNTINGTON. THERE, I MET AN INDIVIDUAL WHO HAD ALREADY ACHIEVED A PHD. WHILE SERVING LIFE. THAT BECAME AN ASPIRATION OF MINE, AND THE NEXT PHASE OF MY LIFE. I STARTED APPLYING FOR COLLEGE.

IN THE 1990S, PELL GRANTS DISAPPEARED TO PROVIDE FINANCIAL AID TO INCARCERATED PEOPLE. HE HELPED ME BY DRAFTING LETTERS TO BUSINESSES AND CHURCHES TO SPONSOR ME. IT WAS A CHURCH THAT RESPONDED AND AGREED TO SPONSOR ME AFTER THEY CONSULTED WITH A FEW VOLUNTEERS FROM THE PRISON SOCIETY WHO HAPPENED TO KNOW ME. I THEN TOOK AN INDEPENDENT STUDY COURSE WITH PENNSYLVANIA STATE UNIVERSITY, WHICH WAS THE BEGINNING OF MY COLLEGE EXPERIENCE. THEN, AT GRATERFORD, I WAS ABLE TO PARTICIPATE IN THE VILLANOVA UNIVERSITY PROGRAM AND CONTINUE MY EDUCATION. BY THEN, I WAS ON THE RIGHT PATH.

THESE WERE TWO INDIVIDUALS WHO WERE CRITICAL TO HELPING ME GET ON MY PATH. I GRAVITATED TOWARDS THEM BECAUSE I HAD ALREADY ACCEPTED PERSONAL RESPONSIBILITY, AND THEY PROVIDED ME WITH A MODEL OF WHAT THAT COULD LOOK LIKE.

d. How did the community outside the correctional institution help/hinder positive changes?

THE RELATIONSHIPS WITH FAMILY MEMBERS ARE LIKE PENDULUMS— YOU KNOW THEY LOVE YOU, BUT THEY GOT A LIFE. WE WANT THEM THERE CONSTANTLY, BUT THEY CAN'T CONSTANTLY BE PRESENT. YOU HAVE TO TAKE RESPONSIBILITY FOR YOUR LIFE. YOU HAVE TO COME TO GRIPS WITH THE FACT THAT YOU HAVE TO TAKE OWNERSHIP OF YOUR LIFE.

MY FAMILY WAS ALWAYS THERE. THEY NEVER ABANDONED ME. BUT EARLY ON, WE SOMETIMES PUT BURDENS ON OUR FAMILIES. YOU WANT THEM TO RESCUE YOU, BUT THEY CAN'T. THAT'S NOT GOING TO HAPPEN. THAT'S WHEN THE GROWTH REALLY STARTS, WHEN YOU START RELYING ON YOURSELF. THAT'S WHAT I LEARNED. YOU HAVE TO TAKE OWNERSHIP OF YOUR LIFE.

e. Did you maintain contact with the community while incarcerated?

IF I NEEDED SOMETHING, THEY WERE THERE FOR ME.

f. How did your community change after you were sent away?

I THINK MY MOTHER TOOK IT THE HARDEST. I THINK SHE THOUGHT THERE WAS MORE THAT SHE COULD DO. THERE WERE THOSE WHO THOUGHT I COULD HAVE PLAYED A ROLL IN THE FAMILY DYNAMICS, OF ENHANCING US AS A FAMILY. LIKE WITH MY BROTHER, WHO DIED OF A DRUG OVERDOSE.

WE HAD JUST MOVED INTO A NEW HOUSE RIGHT BEFORE I WAS ARRESTED. BUT I THINK LIFE WENT ON. I DEVELOPED A PERSPECTIVE OF HOW THINGS COULD BE BETTER, THAT I COULD HAVE SHARED HAD I BEEN AROUND. I STARTED LEARNING ABOUT SYSTEMIC ISSUES AND HOW WE COULD LEARN TO MAKE BETTER DECISIONS.

I HAVE A TON OF NEPHEWS AND IT WAS UNFORTUNATE TO SEE THEM COME THROUGH PRISON. I KNOW I COULD HAVE PLAYED A ROLE TO HAVE PREVENTED THIS FROM HAPPENING. ONE OF MY NEPHEWS IS DOING A LIFE SENTENCE FOR A SECOND DEGREE HOMICIDE RIGHT

NOW. HE'S NOT THE PERSON WHO DID IT. ONE OF MY REGRETS IS THAT I WASN'T THERE TO MENTOR HIM. HE'S LIKE ME. HE SHOULDN'T HAVE BEEN IN THE LIFE. LIKE ME, HE WAS A FOLLOWER. TWO OF MY NEPHEWS ARE IN THE SAME PRISON.

4. What has life been like for you since being paroled?

a. Have there been any positive or negative interactions with the community?

I HAVEN'T HAD ANY NEGATIVE EXPERIENCES, OTHER THAN STILL SEEING YOUNG PEOPLE GOING DOWN THAT SAME PATH I SAW FOR MYSELF 30 YEARS AGO. IT'S DEVASTATING SEEING THAT. YOU THINK, WHAT ROLE CAN YOU PLAY TO PREVENT THIS? IT'S OBVIOUS TO YOU NOW. I GET TO PLAY A ROLE IN HELPING PEOPLE MAKE BETTER DECISIONS. MY JOB AT THE YOUTH SENTENCING & REENTRY PROJECT (YSRP) IS SO REWARDING. I GET TO HELP YOUNG PEOPLE, AGES 17 TO 20S, THINK ABOUT THESE LIFE DECISIONS FROM A LEGAL PERSPECTIVE. I DIDN'T HAVE THAT WHEN I WAS YOUNGER.

ONE EXAMPLE IS WHEN I HAD TO TALK TO A GUY IN DELAWARE COUNTY. HE WAS CHARGED WITH A NUMBER OF GUN CHARGES. HE HAD A DEAL ON THE TABLE, 2 ½ YEARS TO 5, AND HE DIDN'T WANT TO TAKE IT. I ASKED HIM QUESTIONS LIKE, "HOW HAVE YOU CHANGED?" I ASKED HIM FROM THE PERSPECTIVE OF HIS MOTHER— "HOW CAN YOU MAKE BETTER DECISIONS THAT WILL STOP YOUR MOTHER FROM GOING THROUGH MORE PAIN, IF YOU CONTINUE DOING THE SAME THING AND FACE A LOT MORE TIME?" IF HE TOOK THE DEAL, HE'D ONLY HAVE 12 MONTHS MORE TO SERVE. HE KNEW HE WASN'T INNOCENT. HE WENT TO COURT, SAW HIS MOTHER AFTER NOT SEEING HER FOR A LONG TIME, AND STARTED CRYING. THE LITTLE BABY CAME OUT. I WAS ABLE TO HELP HIM THINK ABOUT HOW YOU CAN DO TIME CONSTRUCTIVELY AND COME OUT BETTER. THAT PERSPECTIVE HELPED HIM SEE THE WISDOM OF TAKING THE DEAL.

IT'S REWARDING FOR ME TO HAVE SOME LEVEL OF INFLUENCE WITH YOUNG PEOPLE AND HELP CONNECT THEM TO EXISTING RESOURCES THAT CAN HELP THEM MAKE BETTER DECISIONS. I'VE BEEN BLESSED.

b. How has the community changed since your release?

I WAS A NOMAD. I WASN'T IN ONE SINGLE COMMUNITY. THE PHYSICAL COMMUNITY HAD DRASTICALLY CHANGED WHEN I CAME BACK. THE PEOPLE, THE ARCHITECTURE. PEOPLE THAT I KNEW WEREN'T AROUND ANYMORE. SOME PEOPLE DIED DURING THE CRACK EPIDEMIC. SOME PEOPLE WERE INCARCERATED DURING THE WAR ON DRUGS. THE 80S AND 90S WILL BE REMEMBERED IN TERMS OF DRUGS, AND IT WAS THE BIGGEST PERIOD OF MASS INCARCERATION. OTHER PEOPLE DIED. ONE OF MY BROTHERS, MY YOUNGER BROTHER, PASSED AWAY A FEW YEARS BEFORE I CAME OUT. HE WAS ON DRUGS FOR 20 YEARS.

AS MUCH AS YOUR FAMILY LOVES YOU, WE ALL STILL GROW. MY YOUNGER SISTER IS A YEAR YOUNGER THAN ME— WHEN I LEFT AND WENT TO PRISON, SHE WAS STILL IN HIGH SCHOOL, AND WHEN I CAME OUT, SHE HAD 4 KIDS AND GRANDCHILDREN. THE WORLD DIDN'T STOP WHEN I WENT TO PRISON.

c. Has violence been a concern due to your release?

CONTRARY TO WHAT MANY PORTRAYED WOULD HAPPEN WHEN PEOPLE CONVICTED OF VIOLENT CRIMES CAME HOME, IT HASN'T HAPPENED. MANY OF THE PEOPLE BEING RELEASED ARE CONTRIBUTING TO MAKING THE COMMUNITY BETTER, TO HELPING OTHERS MAKE THE COMMUNITY BETTER, AND TO HELPING YOUNG PEOPLE MAKE BETTER DECISIONS. THERE IS A REPORT FROM MONTCLAIR UNIVERSITY, THAT SINCE THE RELEASE OF THE JUVENILE LIFERS, THERE'S BEEN LESS THAN A 1% RECIDIVISM RATE. MOST OF THEM ARE DYING TO BE INVOLVED IN THE OPPORTUNITY TO MAKE THE COMMUNITY BETTER. THE MYTH OF VIOLENCE HAS BEEN PUT DOWN PRETTY QUICK.

d. Over the years, the city has tried to address community violence. What have you noticed about these efforts?

I'VE BEEN A PART OF A NUMBER OF CONVERSATIONS WITH THE CITY, LOOKING FOR JUSTICE INVOLVED INDIVIDUALS TO THINK ABOUT THIS. IT'S A CHALLENGE. THERE ARE DEEP SYSTEMIC ISSUES; WE DON'T INVEST IN DISMANTLING THESE ROOT CAUSES. THERE'S A LONG HISTORY, AND CHANGE WON'T HAPPEN OVERNIGHT. WE DIDN'T GET

HERE OVERNIGHT. WE CREATED AN ENVIRONMENT CONDUCIVE TO THESE THINGS UNFORTUNATELY.

e. Do some members of your community welcome these efforts?

I LIKE THE CONVERSATIONS AND THE FACT THAT WE'RE HAVING THEM. I ENJOY THE CONVERSATIONS THAT ARE ABOUT LOOKING AT THESE THINGS IN A CRITICAL WAY AND EXPLORING SOLUTIONS.

f. What impact have they had on your community?

SOMETIMES, PEOPLE JUST WANT TO GO BACK TO THE OLD WAYS OF DOING THINGS INSTEAD OF MAKING SYSTEMIC CHANGE. PEOPLE WANT TO GO BACK TO LOCKING PEOPLE UP. IT'S EASIER THAN DEALING WITH SYSTEMIC ISSUES. AS FOR GOVERNMENT, WE NEED TO LOOK AT IT A DIFFERENT WAY, AND USE PEOPLE WHO HAVE BEEN INVOLVED TO CREATE A BETTER SOLUTION. VANESSA HARLEY, WHO WORKS UNDER THE MAYOR, CAME TO YSRP WITH JUVENILE LIFERS. SOME OF THE ORGANIZATIONS GOT A GRANT TO SUPPORT THE WORK THAT THEY ARE DOING TO PREVENT THESE ISSUES.

g. What do you think creates violence in your community?

THERE'S SYSTEMIC ISSUES. WE HAVE INADEQUATE SCHOOL SYSTEMS. THERE'S DISPARITY OF RESOURCES THAT ARE BEING INVESTED IN YOUNG PEOPLE BETWEEN DELAWARE COUNTY, LIKE WHERE I LIVE IN DELCO, AND PHILADELPHIA. THERE'S A DIFFERENCE IN RESOURCES BETWEEN THE SUBURBAN AND URBAN COMMUNITIES. WHEN YOU ADEQUATELY INVEST IN THE COMMUNITY, IT MAKES A DIFFERENCE. IF WE REALLY WANT TO INVEST IN CHANGING THESE ISSUES, WE CAN DO IT. WHEN I DRIVE IN NORTH PHILLY SOMETIMES, I LOOK AROUND AT ALL THE DESPAIR AROUND AND I THINK, HOW COULD ANYONE THINK HOPEFULLY— THAT I HAVE A PROSPEROUS FUTURE AHEAD OF ME, WHEN THERE IS SO MUCH DESPAIR AROUND ME? WE NEED TO CHANGE THAT. WE NEED TO GIVE PEOPLE HOPE. THAT'S PART OF THE DISPARITY. THERE ARE MULTIPLE ARENAS, AND WE'VE SEEN IT ALL EXACERBATED IN LIGHT OF THE PANDEMIC. BUT THE DISPARITIES HAVE BEEN GOING ON FOR A LONG TIME, AND THIS IS ONE OF THE ROOT CAUSES OF THE VIOLENCE.

h. What can be done about it?

IT'S A CHALLENGE. WHEN WE TALK ABOUT DEEP SYSTEM ISSUES, I DON'T KNOW IF WE INVEST ENOUGH IN THE COMMUNITY TO ADDRESS THESE ISSUES. I DON'T THINK IT'S GOING TO HAPPEN OVERNIGHT. WE DIDN'T GET HERE OVERNIGHT.

I hereby swear, declare and verify under penalty of perjury, that the facts set forth above are true and correct to the best of my personal knowledge, information and belief pursuant to 18 Pa. C.S. § 4904.

John A. Pace
John A. Pace

NAME

Dated: 10/19/2021
Philadelphia, PA

Clarence E. Irvine
Commonwealth of Pennsylvania - Notary Seal
CLARENCE E. IRVINE, Notary Public
Philadelphia County
My Commission Expires January 15, 2022
Commission Number 1077323

EXHIBIT E

AFFIDAVIT/DECLARATION OF STACEY TORRANCE

Pursuant to 18 Pa C.S. §4904

Stacey Torrance grew up in North Philly, in the neighborhood around Temple University. At a very young age of 14, Stacey was arrested, tried, and convicted of 2nd degree murder, and sentenced to Life Without Parole. He served nearly 30 years of that sentence and was released on May 18, 2017 when the US Supreme Court declared LWOP sentences for juveniles unconstitutional. Since his release, he has become involved with several organizations in an effort to improve his community as well as to correct the flaws he has experienced and recognized within the justice system. He has been a volunteer with Mothers In Charge (MIC), Inter Generational Healing Circle (IGHC), Families Against Mandatory Minimums (FAMM), Incarcerated Children Action Network (ICAN), and Youth Sentencing Reentry Project (YSRP). He has also created a nonprofit organization, Clothes Off My Back, which gives away free clothes to returning citizens in need. He leads a cleaning business, Stacey's Detail Cleaning Service, which cleans residential and commercial facilities. He is currently planning an initiative, Free Mind Entrepreneur Network (Free M.E.N.), an internet-based network that will unite, highlight, and promote the services of those who are returning citizens to benefit those who are upcoming entrepreneurs.

I STACEY TORRANCE do verify swear that the answers to the below questions are true to the best of my knowledge:

1. Let's talk about what was going on for you before the arrest:

a. What was going on in terms of work or school?

I WAS IN SCHOOL AT THE TIME. I HAD JUST GRADUATED FROM JUNIOR HIGH SCHOOL. THE FALL WAS STARTING, SO I WAS SLATED TO START HIGH SCHOOL RIGHT BEFORE MY ARREST.

b. Living at home?

YES, I WAS LIVING AT HOME.

c. Who lived in the house?

ME, FOUR OF MY OTHER SIBLINGS, AND MY MOTHER. I HAVE FIVE SIBLINGS IN TOTAL.

d. What do you remember about the neighborhood?

IT WASN'T A GREAT NEIGHBORHOOD. IT WAS A CRIME INFESTED NEIGHBORHOOD IN THE HEART OF NORTH PHILLY, AROUND 17TH AND JEFFERSON. IT'S THE TEMPLE UNIVERSITY AREA NOW, AND IT LOOKS WAY DIFFERENT FROM THE WAY IT WAS IN 1988.

2. Tell us about the incident that resulted in you receiving a life sentence?

THE INCIDENT HAPPENED IN 1988. I, ALONG WITH 3 OTHER CO-DEFENDANTS, WERE ENGAGED IN A CRIME. IT WAS SUPPOSED TO BE A ROBBERY. I WAS 14 YEARS OLD, AND I GOT INVOLVED IN ALL THIS DUE TO MY OLDER COUSIN WHO WAS 21. HE WANTED ME TO PARTICIPATE IN A ROBBERY WITH HIM.

THERE WAS A YOUNG MAN WITH A FAMILY WHO WAS DEALING DRUGS. MY COUSIN WANTED TO ROB THE FAMILY AND WANTED ME TO SET UP A DRUG DEAL WITH THE MAN WHO ENDED UP BEING THE VICTIM OF THE CRIME. AFTER I SET UP THE DRUG DEAL, MY COUSIN ACTUALLY TOOK ME HOME. MY COUSIN AND THE 2 OTHER CO-DEFENDANTS WHO I DIDN'T EVEN KNOW MURDERED THE VICTIM THAT I HAD BROUGHT TO THEM. I DIDN'T KNOW THE MURDER WAS GOING TO TAKE PLACE. THEY WANTED ME TO BRING THE VICTIM TO THEM SO THEY COULD TAKE HIS KEYS AND ROB THE HOUSE. THEY HELD THE YOUNG MAN UP AND ENDED UP MURDERING HIM HOURS AFTER I WAS AWAY FROM THE SCENE.

I GOT CHARGED WITH HOMICIDE AND CONSPIRACY. I GOT CHARGED WITH MURDER AND GOT CONVICTED ON SECOND DEGREE. THE VICTIM WAS A YOUNG GUY. I KNEW HIM. HE WASN'T A DRUG DEALER. THEY WANTED KEYS TO HIS HOUSE TO BURGLARIZE IT BECAUSE HIS FAMILY WERE DRUG DEALERS, BUT IT TURNED INTO SOMETHING MORE THAN THAT.

a. Where/when did the incident take place?

MY COUSIN AND I MET UP WITH THE CO-DEFENDANTS IN NORTH PHILLY. WE DROVE TO THE GERMANTOWN SECTION, THEN THEY DROVE ME HOME TO NORTH PHILLY.

b. What do you remember about your interactions with the police?

THE DETECTIVES CAME TO MY HOUSE BECAUSE THEY FOUND OUT I WAS THE LAST ONE TO SEE THE VICTIM. THEY INITIALLY TOLD MY MOTHER THAT THEY WANTED TO ASK ME SOME QUESTIONS. ONCE WE GOT DOWN TO THE POLICES STATION, THEY TOOK ME TO THE INTERROGATION ROOM AND TOLD MY MOTHER THAT SHE COULDN'T COME IN.

THEY HANDCUFFED ME TO THE CHAIR. THEY STARTED THREATENING ME. "WE KNOW YOU KNOW WHAT HAPPENED," THEY TOLD ME. I WAS BACK THERE FOR A WHILE, AND MY MOTHER STARTED ASKING WHAT WAS GOING ON. THEY TOLD MY MOTHER THAT I IMPLICATED MYSELF IN THE CRIME. SHE SAID, "I WANT AN ATTORNEY." THEY SAID, "THERE ARE NO ATTORNEYS HERE. IF HE SIGNS THIS STATEMENT, HE CAN GO HOME." I WAS 14 YEARS OLD. I HAD NO RUN-INS WITH THE LAW. SHE JUST WANTED ME TO COME HOME. SO, I SIGNED THE STATEMENT, AND I GOT ARRESTED. THEY TOOK THE STATEMENT FROM ME WITHOUT A PARENT, GUARDIAN, OR ATTORNEY. THAT'S HOW I IMPLICATED MYSELF IN THE CRIME.

c. What do you remember about your interactions with your lawyer?

THERE WAS NO ATTORNEY APPOINTED AT THE POLICE STATION. AT MY ARRAIGNMENT, THEY APPOINTED ME AN ATTORNEY. I MET HIM DURING THE ARRAIGNMENT. HE VISITED ME ONCE WHEN I WAS AWAITING TRIAL—THAT WAS IT. I HAD NO FURTHER INTERACTIONS WITH HIM. I HAD HARDLY ANY INTERACTIONS WITH HIM. THE ONLY TIME I WOULD SEE HIM IS WHEN I MADE A COURT APPEARANCE.

HE DID TRY TO CHALLENGE THE STATEMENT. HE SAID THAT I MADE THE STATEMENT WITHOUT A LAWYER OR GUARDIAN PRESENT, BUT I CAN'T REMEMBER WHY THE JUDGE DIDN'T ACCEPT HIS ARGUMENT.

I ALSO NEVER HAD A DECERTIFICATION HEARING. THEY ALLOW YOU TO HAVE A DECERTIFICATION HEARING TO CHALLENGE—BUT HE NEVER FILED THE PETITION TO HAVE THE HEARING. YEARS LATER, I TRIED TO CHALLENGE THAT IN COURT. I WROTE TO HIM AND ASKED HIM WHY HE NEVER FILED THE PETITION. HE SAID IT WAS HIS MISTAKE. HE HAD HEARD FROM SOMEONE THAT IT WOULDN'T BE ACCEPTED BECAUSE OF THE NATURE OF THE CRIME, WHICH IS UNTRUE. IT'S ACTUALLY BASED ON YOUR HISTORY AS A JUVENILE.

d. What do you remember about your interactions with the prosecutor?

I NEVER REALLY HAD ANY PERSONAL INTERACTIONS WITH THE PROSECUTOR. I STOOD TRIAL WITH MY CO-DEFENDANTS. MY ATTORNEY NEVER FILED A SEVERANCE. THEY TRIED US ALL TOGETHER—IT WAS ME AND THREE ADULTS ON TRIAL TOGETHER. THEY REALLY WEREN'T FOCUSING A LOT OF ATTENTION ON ME. THE FOCUS WAS ON THE CO-DEFENDANTS. I NEVER HAD ANY INTERACTIONS WITH THE PROSECUTOR.

I REMEMBER THEY TOOK ME DOWN TO A ROOM, BUT THEY DIDN'T OFFER ME ANY NUMBERS. I WAS JUST ASKED IF I WOULD BE WILLING TO HELP OUT THE PROSECUTORS. BUT I SAID I HAD ALREADY GIVEN ALL THE INFORMATION I HAD. I WASN'T WITHHOLDING ANY INFORMATION. HE NEVER PUT A DEAL ON THE TABLE.

e. What do you remember about your interactions with the judge?

I JUST REMEMBER HIM BEING MEAN. HE DIDN'T DIRECT ANY COMMENTS TO ME DIRECTLY. HE WAS A PRO-PROSECUTION JUDGE.

f. Did the system work the way you expected?

NO, IT DID NOT. I DIDN'T THINK I'D BE TRIED IN THE ADULT SYSTEM—I THOUGHT I WOULD BE TRIED IN THE JUVENILE SYSTEM. I DIDN'T HAVE A JUVENILE RECORD. THIS WAS MY FIRST ARREST OR INTERACTION WITH THE LAW. I WASN'T INCORRIGIBLE. I DIDN'T MURDER ANYBODY. I DIDN'T KNOW ANYBODY WOULD BE MURDERED. I DIDN'T KNOW THAT I WOULD STAND TRIAL AS AN ADULT. WHEN I EVENTUALLY DID STAND TRIAL, I DEFINITELY DIDN'T THINK I WOULD BE CONVICTED OF MURDER AND SENTENCED TO LIFE WITHOUT PAROLE.

3. How did you personally change since being sentenced to life?

AFTER I GOT CONVICTED, I AUTOMATICALLY GOT LIFE WITHOUT PAROLE. THE NEXT DAY, I WAS ON A BUS TO GRATERFORD. WHEN I GOT ON THE BUS, THE SHERIFFS ON THE BUS WERE TAKEN ABACK BECAUSE OF MY AGE. THEY WERE IN DISBELIEF; THEY THOUGHT I WOULD HAVE KILLED 2-3 PEOPLE. GOING FROM THE YOUTH STUDY CENTER AND HEARING STORIES OF GRATERFORD AND THE STATE PENITENTIARY, I WAS DEFINITELY AFRAID. I DIDN'T KNOW WHAT TO EXPECT.

a. What are some examples of such change?

I BECAME A MAN ON MY BUS RIDE TO GRATERFORD. I KNEW I COULDN'T GO IN WITH A 14-YEAR-OLD MENTALITY. I WAS JUST TURNING 15. I KNEW I COULDN'T GO IN ACTING LIKE A 15-YEAR-OLD CHILD. I HAD TO BECOME A MAN ALMOST OVERNIGHT. A BIG PART OF ME CHANGED. I HAD TO KILL A PART OF MYSELF IN ORDER TO SURVIVE. I HAD TO GET RID OF THAT CHILD. I DIDN'T PLAY A LOT OF GAMES. I HARDLY EVER SMILED. THAT PART OF ME BECAME OBSOLETE. IT BECAME DEAD.

OVER THE MORE THAN THIRTY PLUS YEARS FOLLOWING, I WAS SOCIAL, BUT I DIDN'T ALLOW A LOT OF PEOPLE TO GET CLOSE TO ME. THAT WAS A WAY OF PROTECTING MYSELF. IT WAS A WAY OF PROTECTING MY FEELINGS AND KEEPING MYSELF FROM BEING PHYSICALLY HARMED. I GOT INTO THE EDUCATIONAL SYSTEM WHILE INCARCERATED—THAT WAS MY OUTLET. I DIDN'T WANT TO MAKE LIFE HARDER.

I TURNED TO THE BOOKS. I DIDN'T REALIZE THE SIGNIFICANCE OF A LIFE WITHOUT PAROLE SENTENCE UNTIL I GOT FURTHER UPSTATE, MAYBE 3 YEARS IN AROUND 1991. IT MEANT I WOULD NEVER COME HOME. THAT REALITY HIT ME HARD, AND IT HARDENED ME. IT MADE ME TURN INWARD. BUT I DIDN'T WANT TO MAKE HARD TIMES HARDER. I STAYED OUT OF TROUBLE.

WHEN I FIRST GOT TO GRATERFORD, I WAS LOCKED DOWN BECAUSE I WAS A JUVENILE. I WAS NOT ALLOWED TO INTERACT WITH ANYONE BECAUSE OF MY YOUTH. I WASN'T ALLOWED TO MOVE AROUND PRISON. GRATERFORD SHIPPED ME TO ANOTHER FACILITY WHERE I WAS LOCKED DOWN MORE THAN I WAS AT GRATERFORD. I STAYED THERE FOR 5 MONTHS. THEN I GOT SHIPPED TO ROCKVIEW, WHERE I STARTED TO MEET PEOPLE.

I WAS EMBRACED BY SOME OLDER MEN, IRONICALLY ALSO LIFERS, WHO KEPT ME OUT OF TROUBLE. THEY ALREADY HAD 15-20 YEARS ON A LIFE SENTENCE. THEY TOOK ME UNDER THEIR WINGS AND ENCOURAGED ME TO READ AND STUDY. I SPENT MY TIME READING AND STUDYING, NOT PLAYING GAMES. THAT WAS MY OUTLET.

b. What factors led to change, if any?

IT WAS THE EDUCATION AND BOOKS WHICH WERE MY OUTLET. I DIDN'T PLAY ANY GAMES. I WOULD SPEND MY TIME READING AND STUDYING.

c. How did the community inside a correctional institution help/hinder positive change?

ONE OF THE FIRST MEN I MEANT WAS A GUY NAMED CARL JOSEPH. HE PASSED AWAY A FEW YEARS BACK. WHEN I STEPPED OFF THE BUS AT ROCKVIEW, HE WAS RIGHT THERE. HE WAS SURPRISED I WAS SO YOUNG, SO HE TOOK ME UNDER HIS WING. AT THAT TIME, HE MUST HAVE HAD 20 YEARS IN ON HIS LIFE SENTENCE. HE WOULD TALK WITH ME, TELL ME WHAT CROWD TO AVOID, AND ENCOURAGE ME TO CONTINUE MY EDUCATION AND GO TO SCHOOL.

AT ROCKVIEW, THERE WERE PENN STATE AND PENNSYLVANIA BUSINESS INSTITUTE (PBI) PROGRAMS. THEY WOULD COME INTO ROCKVIEW AND TEACH FREE COLLEGE COURSES. WHEN I ENTERED PBI IN 1995, THEY FROZE THE PELL GRANTS. THEY GAVE US THE OPTION TO CONTINUE THE COURSE, BUT YOU WOULDN'T RECEIVE ALL THE CREDITS. SO, I CONTINUED THE COURSE. I GOT THE BENEFIT OF THE INFORMATION, BUT I COULDN'T GET THE CREDITS.

d. How did the community outside a correctional institution help/hinder positive change?

WHEN I WAS AT ROCKVIEW, THEY HAD A LOT OF SOCIAL PROGRAMS. THEY TAUGHT IN DIFFERENT GROUPS THAT I GOT INVOLVED WITH, LIKE ALTERNATIVES TO VIOLENCE AND YOUTH AWARENESS GROUPS. WE STARTED AN ALTERNATIVES TO VIOLENCE PROGRAM. WE WOULD SPEAK TO JUVENILES WHO CAME IN. THEY WERE 13-15 YEARS OLD, IN SCHOOL, AND ENGAGING IN RISKY BEHAVIOR. THEY WANTED ME IN THE GROUP BECAUSE I WAS STILL YOUNG. WE LET THEM KNOW WHERE THEY COULD END UP. THOSE ACTIVITIES ARE WHAT HELPED SUSTAIN ME DURING THAT TIME.

e. Did you maintain contact with the community while incarcerated?

WHEN YOU'RE SERVING A LIFE SENTENCE, YOU MAY HAVE A LOT OF SUPPORT IN THE BEGINNING. BUT OVER TIME, THAT FAMILY SUPPORT

BEGINS TO DWINDLE. THE GUY INSIDE BECAME MY FAMILY. THEY ACTUALLY RAISED ME IN PRISON. THEY SAW ME GO THROUGH ALL THE FORMATIVE STAGES AND DEVELOPMENT AT 16, 17, 18, 19. THEY BECAME MY UNCLES, MY BROTHERS, MY FAMILY. I DIDN'T HAVE THAT CONTACT WITH MY FAMILY BEING SO FAR AWAY.

f. How did your community or family change after you or your loved one was sent away?

WHEN I CAME HOME, I WAS SURPRISED THAT THERE WAS NO WARM WELCOME. I HAD A CONVERSATION WITH MY MOTHER, AND SHE SAID THAT PEOPLE NEVER EXPECTED ME TO COME HOME. THERE WAS NO REAL WARM EMBRACE. THERE WAS REALLY NOTHING. THEY WERE SURPRISED WHEN I CAME HOME, BUT I HAD ALREADY PREPARED MYSELF FOR THAT. I DISCOVERED THAT PRISONS SEPARATE FAMILIES. THEY CREATE WEDGES IN EMOTIONS, RELATIONSHIPS, AND TIES. I PREPARED MYSELF IN HOPES THAT I WOULD BE FREE. I WAS ACTUALLY HOMELESS MY FIRST DAY OUT OF PRISON.

I HAD NEVER BEEN AWAY FROM MY FAMILY, JUST ME, SO I WAS JUST KIND OF LOST EARLY ON. I THINK, FOR ME, GOING TO PRISON SO YOUNG CREATED SOME RESILIENCE IN ME. IT DIDN'T MAKE ME GO CRAZY OR HAVE EMOTIONAL TRAUMA THAT I THOUGHT I COULDN'T SURVIVE. IT MADE ME THINK THAT REGARDLESS OF WHAT WAS HAPPENING, THINGS WILL GET BETTER. OVER TIME, I FELT THAT THE NEXT THING I TRIED WOULD WORK. I STARTED DEVELOPING THAT RESILIENCE DURING THE WORST PERIOD OF MY INCARCERATION BECAUSE I HAD NOBODY ELSE. IT WAS SUCH A DARK PLACE. THEY TOOK EVERYTHING AWAY FROM US. I BECAME A DREAMER. I KNEW HOW MY LIFE WAS, AND I STARTED DREAMING ABOUT WHAT MY LIFE COULD BE. IT GAVE ME SOME INNER STRENGTH.

4. What has life been like for you since being paroled?

I WAS RE-SENTENCED AND PAROLED ON MAY 18, 2017. I HAVEN'T HAD A SINGLE BAD DAY SINCE I'VE BEEN HOME, REGARDLESS OF WHAT'S GOING ON. I'M STILL ENJOYING BEING FREE. I'VE HAD STEADY EMPLOYMENT AND HOUSING. I'M WORKING. I STARTED A COUPLE OF BUSINESSES. I DON'T HAVE ANY COMPLAINTS AT ALL.

a. How has the community changed since your/their release?

FROM 1988 TO NOW, IT'S BEEN LIKE A 180 DEGREE CHANGE. I KNOW CERTAIN STREETS BY NAME, BUT THE NEIGHBORHOODS HAVE CHANGED DRASTICALLY. EVEN THE PACE OF THE NEIGHBORHOOD HAS CHANGED. I'M STILL GETTING USED TO THE MENTALITY OF PEOPLE, LIKE THE YOUNGER GENERATION. FOR EXAMPLE, WHEN I WAS COMING UP, YOU COULD SPEAK TO A PERSON, AND THEY'D SPEAK UP. I SEE A LOT OF PEOPLE WALKING AROUND AND THEY'RE UNHAPPY.

THE WAY I SEE PEOPLE TALKING AND INTERACTING WITH THEIR PARENTS—THEIR PARENTS ARE MORE LIKE THEIR FRIENDS. I SEE THIS WITHIN MY FAMILY. I SEE SOME OF NIECES AND NEPHEWS AND HOW THEY INTERACT WITH THEIR PARENTS. IT'S DIFFERENT THAN HOW I WOULD INTERACT WITH MY PARENTS. PEOPLE ALSO AREN'T AS PATIENT THESE DAYS. YOU HAVE TO LEARN THINGS QUICK. LITTLE THINGS LIKE THAT ARE WHAT I'VE NOTICED.

BUT THEN AGAIN... WHEN I WAS OUT, I WAS ONLY 14 YEARS OLD. WHAT DID I KNOW?

b. Has violence been a concern due to your/their release?

NO, IT HASN'T BEEN A CONCERN FOR ME. I DON'T KNOW IF I LIVE IN A BUBBLE. I KNOW WHAT'S HAPPENING, AND I'M NOT NAÏVE TO THE VIOLENCE TAKING PLACE, BUT I DON'T ALLOW IT TO CONSUME ME. I HAVE OTHER THINGS I'M TRYING TO DO. IF YOU ALLOW NEGATIVE THINGS GOING ON AROUND YOU TO CONSUME YOU, YOU WON'T SUCCEED IN LIFE.

c. Over the years, the city has tried to address community violence. What have you noticed about these efforts?

I HAVE BEEN A PART OF A FEW EFFORTS MYSELF. I PARTICIPATED IN A COMMUNITY EVENT WITH DR. DOROTHY JOHNSON-SPEIGHT AND MOTHERS IN CHARGE. WE DID A COMMUNITY EVENT WITH 3 FORMER JUVENILE LIFERS AND HAD CONVERSATIONS WITH MOTHERS. I'M INVOLVED WITH THE INTERGENERATIONAL HEALING CIRCLE, WHERE WE PARTNER WITH YOUNGER INDIVIDUALS AND HAVE CONVERSATIONS ABOUT WHAT'S HAPPENING IN THEIR LIVES AND HELP THEM MAKE

THINGS BETTER. I'M DOING SOME THINGS TO ADDRESS VIOLENCE IN THEIR COMMUNITIES.

AS FOR THE CITY, I'VE HEARD OF A FEW CITY EFFORTS. FOR INSTANCE, THE PHILADELPHIA ANTI-VIOLENCE NETWORK. I'M NOT SURE IF IT'S A PART OF THE CITY OFFICIALLY. I KNOW A FEW GUYS WHO WORK WITH THAT ORGANIZATION. PERSONALLY, I HAVEN'T HAD A LOT OF INTERACTION WITH THE CITY'S EFFORTS. ALL THE EFFORTS I HEAR ABOUT ARE EFFORTS INITIATED BY GUYS THAT ARE FORMERLY INCARCERATED—GUYS THAT I KNOW WHO WERE IN PRISON WITH ME. I DON'T REALLY KNOW WHAT THE CITY IS DOING. ALL THE EFFORTS I SEE ARE FROM PEOPLE FORMERLY INCARCERATED.

d. What impact have they had on your community?

PERSONALLY, I SEE MOTHERS IN CHARGE HAS HAD A HUGE IMPACT ON THE COMMUNITY. THE COUPLE OF EVENTS WE HAD WERE TRANSFORMATIVE. YOU COULD TELL HOW THE COMMUNITY FELT LONG AFTER THE EVENT. I KNOW THE PHILADELPHIA ANTI VIOLENCE NETWORK IS NECK HIGH IN THE COMMUNITY TALKING TO PEOPLE WHO ARE DIRECTLY INVOLVED WITH CRIME. THEY ARE IN THE MIDST OF IT. THEY'RE NOT JUST TALKING, BUT ACTUALLY IN THE MIDST OF WHAT'S HAPPENING IN THE COMMUNITY. THEIR EFFORTS ARE DEFINETELY WORTHWHILE.

e. What do you think creates violence in your community?

POVERTY IS A KEY THING. A LOT OF VIOLENCE IN THE COMMUNITY HAS SOMETHING TO DO WITH MONEY. PEOPLE ARE TRYING TO MAKE MONEY. THE MENTALITY OF THE PEOPLE WITH REGARD TO LIFE IN GENERAL. FOR A LOT OF THE YOUNGER GUYS IN THE INTERGENERATIONAL HEALING CIRCLE, THEIR FRIENDS DIDN'T EVEN EXPECT TO LIVE PAST 21. IF YOU HAVE THE MENTALITY THAT YOU DON'T EXPECT TO LIVE PAST 21, WHAT KIND OF ACTIONS ARE GOING TO COME OUT OF THAT?

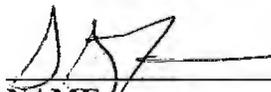
f. What can be done about it?

PROGRAMS THAT GIVE YOUNGER PEOPLE AN ALTERNATIVE TO BEING ON THE STREETS. A LOT OF THE PROGRAMS THAT WE HAD ARE BEING TAKEN AWAY. WE USED TO HAVE THE REC CENTER, WHERE WE COULD PLAY BALL. NOT ONLY

THAT, BUT WE NEED PROGRAMS THAT TEACH PEOPLE ABOUT EMPLOYMENT AND ENTREPRENEURSHIP. WE NEED TO GIVE THEM HOPE. WE NEED TO GIVE THEM A DREAM THAT THEY CAN BELIEVE IN THAT'S DIFFERENT THAN WHAT THEY SEE EVERY DAY. ONE WHERE THEY CAN SEE THEMSELVES ACHIEVING SUCCESS AS THEY GROW INTO ADULTS.

A LOT OF MEN AND WOMEN CAME OUT OF PRISON AND THEY'RE DOING UNBELIEVABLE WORK IN THE COMMUNITY. THEY DON'T HAVE TO, BUT THEIR HEARTS ARE IN IT. A LOT OF WHAT THEY'RE DOING IS SIMILAR TO THE ACTIVITIES THAT THEY WERE ENGAGED IN WHILE THEY WERE INCARCERATED. IT'S JUST AN EXTENSION OF WHAT THEY LEARNED INSIDE. THEY'RE DOING SOME AMAZING THINGS OUT THERE.

I hereby swear, declare and verify under penalty of perjury, that the facts set forth above are true and correct to the best of my personal knowledge, information and belief pursuant to 18 Pa. C.S. § 4904.


NAME _____

Dated: 10/6/2021
Philadelphia, PA



Commonwealth of Pennsylvania - Notary Seal
CLARENCE E. IRVINE, Notary Public
Philadelphia County
My Commission Expires January 15, 2022
Commission Number 1077323

EXHIBIT F

AFFIDAVIT/DECLARATION OF TYRONE WERTS

Pursuant to 18 Pa C.S. §4904

In 1975, Tyrone Werts was convicted as an accomplice to a second-degree murder and sentenced to life in prison without parole. Werts spent the next 36 years at SCI Graterford. During his incarceration, Werts earned a Bachelor of Arts degree from Villanova University. He was heavily involved in developing the Temple University's Inside-Out Prison Exchange Program and was a founding member of its affiliated Think Tank group. Inspired by his extensive work in a leadership role with the prison's Lifers organization, he established The Lifers' Public Safety Initiative, a crime prevention program that has received national and international attention and is based on the "Culture of Street Crime" theory he developed with other incarcerated men to propose solutions to violent crime in prisons and communities.

On December 30, 2010, after serving 36 years at SCI-Graterford, Werts' life sentence was commuted by former Governor Ed Rendell. Werts is presently Co-Founder and CEO of The End Crime Project, a Consultant at the Defenders Association of Philadelphia, and serves as a Public Relations Consultant to the Inside-Out Prison Exchange Program at Temple University. He is Founder and Director of The Lifers Public Safety Initiative (PSI), he serves on the Mayor's Commission on African American Males and was a Soros Justice Fellow, 2013.

I TYRONE WERTS do verify swear that the answers to the below

questions are true to the best of my knowledge:

1. Let's talk about what was going on for you before the arrest.

a. What was going on in terms of work or school?

I GOT ARRESTED WHEN I WAS 23 YEARS OLD. I WAS MARRIED, AND I HAD A DAUGHTER. I WORKED AS AN AUTO MECHANIC AND OWNED MY HOME. I WAS TRYING TO BE A RESPONSIBLE PERSON, BUT I ALSO HAD A DRAW TO THE STREETS.

b. Living at home?

YES, I LIVED AT HOME. IT WAS LOCATED AT 8645 FORREST AVE, MOUNT AIRY. IT WAS MY OWN HOME—I OWNED IT.

c. Who lived in the house?

MY WIFE AND CHILD LIVED AT HOME. MY DAUGHTER WAS 2 YEARS OLD AT THE TIME OF MY ARREST.

d. What do you remember about the neighborhood?

IT WAS A MIDDLE CLASS AFRICAN AMERICAN NEIGHBORHOOD. MY WIFE WANTED TO LIVE THERE SO MY DAUGHTER WOULD HAVE MORE OPPORTUNITY THAN SHE WOULD HAVE HAD IN NORTH PHILLY, WHERE WE HAD BEEN LIVING PREVIOUSLY. IT WAS A NICER AREA THAN OTHER PARTS OF THE CITY, AND EVERYONE DID WELL THERE.

2. Tell us about the incident that resulted in you receiving a life sentence.

a. Where/when did the incident take place?

IT OCCURRED AT 31ST AND ARIZONA IN NORTH PHILADELPHIA. THE YEAR WAS 1975. I HAD A DUALITY TO MY PERSONALITY: I WAS TRYING TO BE A RESPONSIBLE PERSON BUT AT THE SAME TIME, I WAS DRAWN TO THE STREETS. I WAS HANGING OUT WITH SOME FRIENDS ON 25TH AND ALLEGHENY. A GUY CAME TO US AND TOLD US THERE WAS A DRUG DEALER HE WANTED TO ROB. WE PICKED UP ANOTHER INDIVIDUAL NAMED TYRONE MOORE, WHO WOULD KNOW WHERE THE DEALER WAS, BUT WE DIDN'T FIND HIM. TYRONE SUGGESTED ROBBING A SPEAKEASY INSTEAD, WHERE THERE WOULD BE A LOT OF MONEY. I SAID I DIDN'T WANT TO BE INVOLVED IN IT AND STAYED IN THE CAR. I WASN'T THE LOOKOUT OR THE GETAWAY DRIVER, BUT I STAYED IN THE CAR IN THE BACKSEAT. I DISTANCED MYSELF FROM IT.

THEY CAME BACK TO THE CAR AND SAID THEY'D SHOT SOMEBODY AND DIDN'T KNOW IF HE HAD DIED. I DIDN'T THINK ABOUT IT; I HAD ALREADY DISASSOCIATED MYSELF FROM IT, SO I JUST TOLD THEM TO TAKE ME HOME. 30 DAYS LATER, THE POLICE CAME TO MY HOUSE, KNOCKED DOWN THE DOOR, AND TOOK ME TO THE STATION. ONE OF THE GUYS HAD SAID I WAS THERE.

b. What do you remember about your interactions with the police?

BACK IN THE EARLY 70S, THE HOMICIDE DIVISION WAS VERY VIOLENT, LIKE STORMTROOPERS. WHEN THE POLICE SHOWED UP AT MY DOOR, I

DIDN'T KNOW WHY THEY WERE THERE. I WAS RAISED TO RUN, THEN FIND OUT WHY. THEY ARRESTED ME, RANSACKED MY HOUSE, AND HANDCUFFED MY WIFE AND SISTER-IN-LAW. I CAN'T REMEMBER WHAT THEY DID WITH MY DAUGHTER. BOTH WOMEN WERE HANDCUFFED ON THE FLOOR, AND THEY KEPT ASKING MY WIFE, "WHERE THE GUNS AT? WHERE THE GUNS AT?" I WAS VICIOUSLY ASSAULTED IN MY HOUSE. THEY WERE SO ANGRY. A POLICE DETECTIVE WHO WAS LATER CHARGED WITH VIOLATING CIVIL RIGHTS OF SUSPECTS WAS BROUGHT IN. I WAS ASSAULTED BY HIM AT MY HOUSE, AND THEN AT THE POLICE ADMINISTRATION BUILDING.

c. What do you remember about your interactions with your lawyer?

THE SAD PART OF THAT STORY IS THAT MY FAMILY DECIDED TO GET ME A PAID LAWYER WHO MY SISTER KNEW. BUT HE HAD NEVER TRIED A SERIOUS VIOLENT CASE BEFORE. HE WAS INEXPERIENCED AND MADE A LOT OF MISTAKES. AT MY APPEAL AT THE 3RD CIRCUIT, JUDGE MCKEE WROTE A DISSENT AND POINTED OUT THAT HE WAS INEFFECTIVE. THERE WAS A MOMENT IN COURT WHEN THE PROSECUTOR SAID, "YOU KNOW HOW PEOPLE IN NORTH PHILLY ARE." THE LAWYER OBJECTED, BUT TOO LATE.¹

d. What do you remember about your interactions with the prosecutor?

I DIDN'T REALLY HAVE A WHOLE LOT OF INTERACTION WITH HIM. HE SAID TO THE JURY, "YOU HAVE TO FIND THIS INDIVIDUAL GUILTY OF FIRST-DEGREE MURDER BECAUSE HE'S FROM NORTH PHILLY." HE GOT AWAY WITH A LOT OF TACTICS THAT WERE UNFAIR TO ME. THEY'RE WRITTEN IN MY APPEAL.

THE PROSECUTOR WAS VERY SMART. DURING THE VOIR DIRE, HE KIND OF INTIMATED TO THE JURY THAT A 2ND DEGREE CONVICTION WOULDN'T RESULT IN LIFE. HE SAID TO THEM, "THIS IS NOT A DEATH PENALTY CASE, BUT WOULD YOU HAVE TROUBLE WITH A LIFE SENTENCE?" HE ASKED FOR 1ST DEGREE. HE PUT INTO THEIR MIND THAT 1ST DEGREE IS LIFE IN PRISON, BUT 2ND DEGREE ISN'T. THE JURY DIDN'T WANT TO SENTENCE ME TO LIFE, AND THOUGHT 2ND DEGREE WOULD BE LESS.

¹ See *Werts v. Vaughn*, 228 F.3d 178 (C.A.3 (Pa.), 2000)

36 YEARS LATER, I TRACKED HIM DOWN IN CALIFORNIA AND SENT HIM A PACKET OF INFORMATION ON WHAT I HAD DONE AND ACCOMPLISHED IN PRISON. HE WROTE A SUPPORT LETTER TO THE COMMUTATION BOARD FOR ME.

e. What do you remember about your interactions with the judge?

I DIDN'T HAVE A WHOLE LOT OF INTERACTION WITH THE JUDGE. I THOUGHT HE TREATED MY LAWYER UNFAIRLY. MY LAWYER WAS SO INEXPERIENCED, AND HE HAD NEVER TRIED A MURDER CASE BEFORE. I DON'T THINK THE JUDGE SHOWED HIM A LOT OF RESPECT. ALMOST EVERYTHING HE OBJECTED TO WAS OVERRULED, ESPECIALLY ANYTHING RELATED TO RACE. WHEN THE PROSECUTOR KEPT HINTING THAT I LIVED IN NORTH PHILLY, AND SAID "YOU KNOW HOW PEOPLE ARE UP THERE"— THAT WAS A RACIALLY MOTIVATED REMARK. HE WOULDN'T LET CERTAIN EVIDENCE IN, EITHER, LIKE THE FACT THAT I HAD GOTTEN SHOT BY THE POLICE BEFORE. THAT'S THE REASON I HID FROM POLICE WHEN THEY CAME. THE PROSECUTION ARGUED THAT I HID FROM THEM BECAUSE I WAS GUILTY, AND SAID "THE INNOCENT STAND BOLD AS A LION." MY LAWYER WANTED TO BRING IN FEAR I HAD FROM BEING SHOT BY POLICE IN 1969, BUT THE JUDGE WOULDN'T ALLOW THAT.

AT THE SENTENCING, I WAS JUST SO ANGRY, BITTER, AND UPSET. I FELT LIKE I HAD BEEN RAILROADED. I DIDN'T WANT TO SHOW ANY EMOTIONS OR BREAK DOWN IN FRONT OF HIM. JUDGE MCKEE OF THE APPEALS COURT LATER SAID THE JUDGE BROUGHT OUT HIS BIG RUBBER STAMP AND AFFIRMED THIS CASE WITHOUT LOOKING AT THE FACTS.

f. Did the system work the way you expected?

NO, IT DIDN'T. I TOOK THE STAND IN MY CASE. THE CO-DEFENDANT TESTIFIED AGAINST ME, BUT HE NEVER EVEN MENTIONED MY NAME. I FELT LIKE I HAD TO EXPLAIN WHY I WAS THERE, THAT I HAD NOTHING TO DO WITH THE ROBBERY. I GOT ON THE STAND AND LAID OUT THAT I WAS IN THE PASSENGER SEAT OF THE CAR—NEVER A LOOKOUT OR GETAWAY DRIVER. THE JURY THOUGHT I WAS GUILTY OF SOMETHING, BUT NOT OF 1ST DEGREE MURDER.

I WAS OFFERED A DEAL, 8-20 YEARS. I TURNED IT DOWN BECAUSE THEY WANTED ME TO PLEAD GUILTY TO MURDER.

3. How did you personally change since being sentenced to life?

WHEN I GOT TO GRATERFORD, I WAS REALLY ANGRY AND BITTER. I WAS INNOCENT, BUT I FELT RAILROADED. WHEN I GOT THERE, THERE WAS A LIFER ORGANIZATION IN THE PRISON. AN OLDER GUY CAME TO MY CELL AND TOLD ME, "I HAVE A LIST THAT SAYS YOU'RE A LIFER. I REPRESENT THE LIFER ORG HERE, AND WE ARE HAVING A SEMINAR." I SAID TO HIM, "I'M NOT GOING TO NO DAMN LIFERS MEETING." IN MY MIND, I WAS GETTING OUT. HE CAME BACK A DAY LATER, AND I ENDED UP GOING DOWN THERE WITH HIM, MET THE LIFERS, AND WENT TO THE MEETING.

THERE WERE ABOUT 20 OUTSIDE VOLUNTEERS, AND 100 LIFERS. THERE WERE DIFFERENT GROUPS ON TOPICS LIKE PAROLE ELIGIBILITY AND GROUP DYNAMICS. I DIDN'T WANT TO BE THERE—I WANTED TO GET OUT OF MY HORRIBLE SITUATION. EVENTUALLY, THEY BROKE FOR A BUFFET STYLE LUNCH. I WAITED UNTIL THE END TO GET MY TRAY. THE LAST SEAT WAS NEXT TO THE GUY WHO LED THE SEMINAR. HE WAS A MOTIVATIONAL SPEAKER FROM LANDMARK EDUCATION. HE ASKED ME HOW I WAS DOING. THEN HE SAID TO ME, "YOU SEEM LIKE AN ANGRY, BITTER, RESENTFUL MAN. IT'S SEETHING OUT OF YOUR PORES." I SAID, "OF COURSE I AM." HE SAID, "I DON'T KNOW ANYTHING ABOUT YOU, BUT YOU'LL BE HERE 5 YEARS, 10 YEARS, YOUR WHOLE LIFE. YOU HAVE A FAMILY AT HOME. YOU GOTTA MAN UP. THEY'RE GONNA NEED YOU." I WAS VERY SELFISH, AND I WROTE IT OFF. HE SAID TO ME, "I WANT YOU TO PROMISE ME ONE THING—JUST CREATE A GREAT LIFE FOR YOURSELF." I DISMISSED IT.

A COUPLE OF WEEKS LATER, THERE WAS A STABBING IN THE PRISON. THE WHOLE PRISON GOT LOCKED DOWN. I WAS IN MY PRISON CELL FOR 5 DAYS. I STARTED THINKING ABOUT MY SITUATION AND MY CONVERSATION WITH THIS GUY. I REALIZED THAT AS I WAS STANDING IN FRONT OF THE JUDGE, I HAD BEEN FOCUSED ON THE JUDGE INSTEAD OF MY FAMILY BEHIND ME. I HAD BEEN IN FRONT OF THE JUDGE, NOT SHOWING ANY EMOTION, BUT THE MOMENT AND EMOTION CAME BACK TO ME IN MY CELL. IN THE COURTROOM, THERE HAD BEEN COMMOTION BEHIND ME. MY FAMILY HAD BEEN CRYING, SOMEONE HAD RUN OUT OF THERE CRYING. I HAD BEEN THINKING ABOUT POOR PITIFUL ME, BUT I WASN'T THINKING ABOUT THE IMPACT ON MY FAMILY.

IT WAS AN EPIPHANY MOMENT. AT THAT MOMENT, I DECIDED I HAD TO DO SOMETHING DIFFERENT WITH MY LIFE. I STARTED GOING TO SCHOOL. I JOINED THE LIFER ORGANIZATION. IT MADE ME REALIZE THAT ALL THIS TIME I HAD SAID I WAS INNOCENT, BUT I HAD TO TAKE RESPONSIBILITY FOR MY PART. I WAS IN THE CAR WITH 4 GUYS WITH GUNS. IN THE 1980S, I WROTE THE JUDGE, THE PROSECUTOR, MY LAWYER, THE VICTIM'S FAMILY, AND MY PARENTS. I APOLOGIZED FOR SAYING I WAS INNOCENT, AND THAT I HAD TO TAKE RESPONSIBILITY FOR BEING IN THE CAR THAT NIGHT. IT FREED ME TO MOVE FORWARD. IT HAD BEEN NAGGING ME FOR A LONG TIME, AND I FELT I HAD LIED TO EVERYONE BY SAYING I WAS INNOCENT.

THIS REALIZATION CAME FROM THE FOUNDATION I HAD FROM MY MOTHER AND FATHER. I WAS IN THE PROCESS OF APPEALING MY CASE BECAUSE I WANTED TO GET HOME BEFORE MY PARENTS PASSED AWAY, BUT I STARTED TO FOCUS NOT JUST ON MY FREEDOM BUT TO BECOME THE MAN MY PARENTS RAISED ME TO BE.

a. What are some examples of such change?

EDUCATION, AND THINKING ABOUT THE IMPACT OF MY INCARCERATION ON MY FAMILY. WHEN I FIRST GOT TO PRISON, THEY GAVE ME A BATTERY OF TESTS. A GUY NAMED ERNIE BELLOW WAS THE COUNSELOR WHO DID THE ASSESSMENTS AND INTERVIEWED ME. HE CALLED ME TO HIS OFFICE AND TALKED TO ME ABOUT THE RESULTS. IT WAS UNUSUAL THAT HE TOOK INTEREST IN ME. HE SAID, "YOU'RE READING AT A SECOND GRADE LEVEL AND YOUR MATH SKILLS ARE AT A THIRD GRADE LEVEL." I THOUGHT TO MYSELF, "OK, I KNOW I'M DUMB. I HAD A TEACHER IN ELEMENTARY SCHOOL TELL ME THAT I WASN'T THAT BRIGHT." BUT THE COUNSELOR CONTINUED ON. HE SAID, "HOWEVER, YOUR IQ IS ABOVE AVERAGE. YOU COULD DO ACADEMIC WORK, BUT YOU'RE JUST NOT APPLYING YOURSELF." HE WANTED TO PUT ME IN NIGHT SCHOOL TO GET MY GED. AT FIRST, I RESISTED, BUT HE STAYED ON ME. EVENTUALLY, I JOINED HIS CLASS AND HE TAUGHT ME.

I TOOK THE GED AND I PASSED. I THOUGHT I HAD FAILED IT, BUT HE TOLD ME I GOT THE HIGHEST SCORE OF ANYONE WHO HAD TAKEN IT. I FELT SO PROUD. EVENTUALLY, I SIGNED UP FOR COLLEGE AND RECEIVED A BACHELOR'S DEGREE FROM VILLANOVA UNIVERSITY.

b. What factors led to change, if any?

THE LIFER ORGANIZATION WAS FORMED FOR ONE PURPOSE—TO CHANGE THE LAW TO MAKE LIFERS ELIGIBLE FOR PAROLE. IT WASN'T A SOCIAL ORGANIZATION, BUT A POLITICAL ORGANIZATION. BUT WE DID CREATE A LOT OF PROGRAMS INSIDE THE INSTITUTION NOT ONLY FOR OURSELVES, BUT FOR THE GENERAL POPULATION AND THOSE ON THE OUTSIDE. GRATERFORD WAS FLEXIBLE ENOUGH TO DO THAT.

c. How did the community inside a correctional institution help/hinder positive change?

THE COMMUNITY REALLY HELPED ME BECAUSE OF HOW PROGRESSIVE THE PRISON WAS. IN SOME PRISONS, THERE'S A LOT OF GROUP THINK SINCE WE ONLY GET TO SEE EACH OTHER, OR FAMILY IF THEY TRAVEL THE DISTANCE TO SEE US. BUT AT GRATERFORD, WE HAD AN OPEN-DOOR POLICY AND A LOT OF VOLUNTEERS. WE HAD THE OPPORTUNITY TO MEET LOTS OF PEOPLE AND HAVE CONVERSATIONS WITH THEM. THAT GIVES YOU ANOTHER SIDE OF THINGS TO LOOK AT AND CHALLENGES YOU. THE WAY GRATERFORD WAS STRUCTURED HELPED FACILITATE MY UPWARD TRAJECTORY.

d. How did the community outside a correctional institution help/hinder positive change?

I COME FROM A GOOD STRONG FAMILY. I WAS THE ONLY ONE WHO WENT SIDEWAYS. I CAN TRACE IT BACK TO WHAT HAPPENED TO ME IN ELEMENTARY SCHOOL, WHEN A TEACHER TOLD ME I WAS TOO DUMB TO BE AN ASTRONOMER. THAT SET ME DOWN A BAD PATH. I THOUGHT, "SO WHY SHOULD I GO TO SCHOOL?" IT PUSHED ME DEEPER IN THE STREETS.

BUT MY FAMILY CAME TO SEE ME EVERY 90 DAYS, EVEN MY PARENTS AND SIBLINGS. I HAD A STRONG FAMILY CONNECTION. I BECAME THE PRESIDENT OF THE LIFERS ASSOCIATION, AND I BUILT A LOT OF BROAD COMMUNITY SUPPORT THROUGH THAT. ALL OF THIS HELPED FACILITATE THE TRAJECTORY I WAS ON. IT PUT ME IN A SETTING THAT CHALLENGED ME. THERE WERE THINGS I THOUGHT I DIDN'T KNOW, AND I ALWAYS TRIED TO LEARN THEM. I HAD TO READ ALL THESE BOOKS, LIKE THE WRITINGS OF SOCRATES, SO I WOULD KNOW WHAT PEOPLE WERE TALKING ABOUT.

e. Did you maintain contact with the community while incarcerated?

YES. MY SITUATION IS UNIQUE FROM MOST PEOPLE BECAUSE OF ALL THE FAMILY AND COMMUNITY SUPPORT I HAD.

f. How did your community or family change after you were sent away?

THINGS CERTAINLY CHANGED FOR MY WIFE. WE LOST OUR HOUSE BECAUSE I WASN'T THERE. I WASN'T THERE FOR FAMILY GATHERINGS. I WAS ALWAYS MISSING. THAT WAS A BIG CHANGE FOR THEM.

I LOST MY PARENTS. I LOST A COUPLE OF SIBLINGS. IT WAS VERY SAD FOR ME, BECAUSE MY MISSION FOR GETTING OUT OF PRISON WAS FOR MY MOTHER AND FATHER TO SEE ME AS THE MAN THEY RAISED ME TO BE. I REALLY WANTED THEM TO SEE ME OUTSIDE OF THE PRISON WALLS. ONE OF MY SISTERS DIED FROM CANCER. MY OTHER SISTER WAS YOUNGER THAN ME, IN HER LATE 20S OR EARLY 30S, AND SHE WAS MURDERED IN PHILLY IN THE 90S.

4. What has life been like for you since being paroled?

a. How has the community changed since your release?

I DIDN'T COME BACK TO MY SAME COMMUNITY. I DON'T THINK IT'S CHANGED THAT MUCH. PEOPLE ARE THE SAME, THE STREETS ARE THE SAME. THE BIGGEST CHANGE IS HOW PEOPLE RELATE TO TECHNOLOGY—IT WAS AN EYE OPENER FOR ME. ON THE FIRST DAY I GOT HOME, I WAS WALKING DOWN MARKET STREET SEEING PEOPLE TALKING TO THEMSELVES. I CALLED MY PSYCHIATRIST MENTOR ABOUT IT, JUST IN CASE I WAS HAVING ANXIETY. I TOLD HIM I HAD A WEIRD EXPERIENCE SEEING PEOPLE TALKING TO THEMSELVES. I WOULD SAY SOMETHING AND THEY WOULDN'T ANSWER ME. HE SAID, "PEOPLE ARE TALKING ON BLUETOOTH."

I WAS GONE FOR 37 YEARS, BUT I WAS FULLY ENGAGED. I WAS GETTING 3 FREE NEWSPAPERS. I HAD A TELEVISION AND MAGAZINES. I HAD TWO JOBS WAITING FOR ME WHEN I GOT OUT. I HAD SO MUCH COMMUNITY AND FAMILY SUPPORT. I WAS ABLE TO HIT THE GROUND RUNNING.

b. Has violence been a concern due to your release?

ABSOLUTELY, ESPECIALLY LATELY. I WAS CONCERNED ABOUT THE VIOLENCE IN THE AFRICAN AMERICAN COMMUNITY ESPECIALLY. I WROTE A PROPOSAL AND RECEIVED A SOROS FELLOWSHIP BECAUSE I WAS CONCERNED ABOUT THIS. I HAVE ALWAYS BEEN CONCERNED ABOUT WALKING DOWN THE STREET AND RUNNING INTO SOME GUYS. I AM OLDER, SO I DIDN'T WANT TO GIVE YOUNG PEOPLE IDEAS ABOUT ROBBING ME. BUT I'M NOT CONCERNED WITH THAT ANYMORE.

I WANTED TO DO SOMETHING ABOUT IT. I WANTED TO GET INVOLVED IN THE COMMUNITY TO HELP WITH THE VIOLENCE GOING ON. I DID A LOT OF PUBLIC MEETINGS, PUBLIC EDUCATION, AND ORGANIZING WITH PEOPLE WHO WERE FORMERLY INCARCERATED TO TRY TO ENGAGE YOUNGER GUYS IN CONVERSATION. WE ARE TRYING TO START A TRADE SCHOOL. I FEEL LIKE 85-90% OF ALL CRIME IS ECONOMIC CRIME. IT'S GUYS TRYING TO FIND A WAY TO MAKE SOME QUICK MONEY. WE HAVE TALKED TO DEVELOPERS ABOUT GETTING THEM INTO CONSTRUCTION, TO CREATE JOBS FOR YOUNG GUYS ON THE STREETS, AND TO ORGANIZE OLDER FORMER GANG MEMBERS WHO HAVE CREDIBILITY AND RESPECT. WE HAD SOME SUCCESS WITH ORGANIZING THE GUYS. BUT THE SOROS MONEY RAN OUT AND AN INVESTOR MOVED AWAY.

SOME PEOPLE ARE SCARED AND FEARFUL OF LIFERS GETTING OUT. BUT THEY'RE LEADERS, AND WE NEED THEM.

c. Over the years, the city has tried to address community violence. What have you noticed about these efforts?

THE CITY HAS A DETERRENCE PROGRAM. I AM VERY NEGATIVE ON THE WAY THEY TRY TO SOLVE VIOLENCE—IT HAS TO BE MORE COMMUNITY BASED. I'VE TALKED TO THE CITY AND THE POLICE DEPARTMENT TO DO WHAT WE ARE DOING: GETTING THE OLDER GUYS TO TALK TO THE YOUNGER GUYS. THAT WILL EMPOWER THE COMMUNITY, BUT NOBODY IS TALKING TO THEM BECAUSE EVERYBODY IS AFRAID OF THEM.

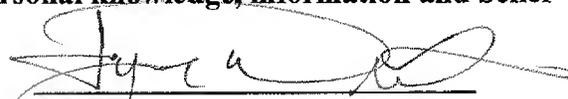
I DON'T HAVE A LOT OF HOPE. THOSE WHO KNOW THE STREET CRIME CULTURE—EX OFFENDERS, EX GANG MEMBERS—ARE THE BEST PEOPLE TO GET INVOLVED IN THE LIVES OF YOUNGER GUYS. THEY GRAVITATE TOWARDS US. THEY CALL US POPS. INSIDE, A LOT OF LIFERS HAD

YOUNGER GUYS WHO CALLED THEM POPS. THAT WAS SOMEONE WHO LOOKED OUT FOR THEM. I THOUGHT THAT MODEL WOULD WORK IN OUR COMMUNITIES: OLDER GUYS WHO KNOW THE STREETS LOOKING OUT FOR THE YOUNGER GUYS. THERE ARE A LOT OF EX OFFENDER GUYS WHO ARE MARRIED NOW. THEY HAVE MATURED AND THEY ARE RESPONSIBLE. THEY KNOW THE COMMUNITY, KNOW WHO'S WHO, AND CAN SPEAK TO THEM IN A LANGUAGE THAT NO ONE ELSE CAN UNDERSTAND. WHATEVER THE CITY IS DOING NOW IS NOT WORKING. WE NEED TO THINK OUTSIDE OF THE BOX.

d. What do you think creates violence in your community?

MOST OF IT IS ECONOMIC BASED. BUT LATELY, IT APPEARS TO BE JUST SENSELESS VIOLENCE. THERE'S NOT EVEN AN ECONOMIC COMPONENT. IT'S BEEFS AND ARGUMENTS AND SOCIAL MEDIA—BEEF ON SOCIAL MEDIA, THEN "I'M GONNA GET YOU", THEN A RANDOM SHOOTING AND INNOCENT PEOPLE BEING SHOT. IN MY GENERATION, UP TO THE 80S AND 90S, IT WAS ECONOMIC, THEN IT WAS DRUGS. NOW IT SEEMS SENSELESS. IT'S NOT ROBBERY. IF THE POLICE WOULD MONITOR SOCIAL MEDIA, THEN THEY COULD PROBABLY FIGURE OUT WHAT'S ABOUT TO HAPPEN. PEOPLE ARE BORED. NOBODY IS WORKING. THEY DON'T HAVE ANYTHING TO DO. THEY'RE JUST BEEFING AND CAUSING HOSTILITIES.

I hereby swear, declare and verify under penalty of perjury, that the facts set forth above are true and correct to the best of my personal knowledge, information and belief pursuant to 18 Pa. C.S. § 4904.


NAME TY ROWE WERTS

Dated: 10/8/2021
Philadelphia, PA

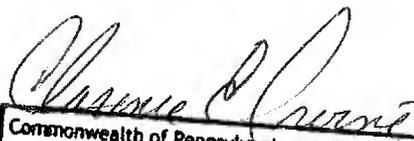

Commonwealth of Pennsylvania - Notary Seal
CLARENCE E. IRVINE, Notary Public
Philadelphia County
My Commission Expires January 15, 2022
Commission Number 1077323

EXHIBIT G

AFFIDAVIT/DECLARATION OF BRENDA HARRIS

Pursuant to 18 Pa C.S. §4904

Brenda Harris is a longtime resident of North Philadelphia. Her son Jerome Harris has been incarcerated in Pennsylvania for over 23 years, serving a life without parole sentence for second-degree murder. Ms. Harris is a member and leader of the Coalition to Abolish Death By Incarceration (CADBI) and helps lead the Pressure Points committee within CADBI. She has spoken out at city and statewide events with the PA Poor People's Campaign about the issues of poverty, violence, and mass incarceration that impact her community, especially North Philadelphia.

I BRENDA HARRIS do verify swear that the answers to the below questions are true to the best of my knowledge:

1. Let's talk about what was going on for your loved one before the arrest.

a. What was going on in terms of work or school?

I HAVE TWO IDENTICAL TWIN SONS, AND MY DAUGHTER. JEROME AND HIS TWIN BROTHER, TYRONE, HAD TO BE SEPARATED WHEN THEY WERE IN SCHOOL. THEY WOULD FIGHT GOING INTO SCHOOL AND GETTING OUT OF SCHOOL, SO THEY WERE PUT IN TWO DIFFERENT SCHOOLS. THEY STILL FOUGHT. BUT THEY WEREN'T BAD BOYS. ONE OF THE BOYS—JEROME'S TWIN BROTHER—GOT INTO TROUBLE AS A TEENAGER. HE TOOK PEOPLE'S CARS WHEN HE SHOULDN'T HAVE. BUT JEROME DIDN'T HAVE MANY PROBLEMS AT ALL. HE WAS 19 YEARS OLD WHEN HE WAS TAKEN AWAY, AND THAT WAS 23 YEARS AGO.

b. Living at home?

YES.

c. Who lived in the house?

ME, HIS TWIN BROTHER, AND MY DAUGHTER.

d. What do you remember about the neighborhood?

THE NEIGHBORHOOD WAS NOTHING LIKE IT IS NOW. THERE MAY HAVE BEEN FIGHTS AND SUCH, BUT THERE WAS NOTHING LIKE THE SHOOTINGS THAT GO ON NOW. MY CHILDREN DIDN'T HAVE A PROBLEM IN THIS NEIGHBORHOOD. THEY DIDN'T HAVE A PROBLEM WITH ANYONE HERE. MY CHILDREN HAD ASSOCIATES IN THE NEIGHBORHOOD... I WOULDN'T CALL THEM FRIENDS. I WOULD TELL MY SON, "YOU DON'T HAVE ANY FRIENDS BUT YOUR BROTHER." MY SON THAT'S AWAY NOW REALIZES THE TRUTH OF THAT. THE ONLY REAL FRIEND HE HAS IS HIS BROTHER. NONE OF HIS ASSOCIATES COME TO SEE HIM, TALK TO HIM, OR PUT MONEY ON HIS BOOKS.

HE HAD ONE FRIEND IN PARTICULAR, TERRELL. I KNEW TERRELL WAS NO GOOD. I DIDN'T WANT HIM AROUND BECAUSE I DIDN'T WANT HIM AROUND MY DAUGHTER, WHO WAS 5 YEARS OLD.

2. Tell us about the incident that resulted in your loved one receiving a life sentence.

a. Where/when did the incident take place?

IT HAPPENED IN DECEMBER 1997, IN LOGAN. I WAS WORKING, AND I WAS GOING TO WYOMING TO MEET MY RIDE. MY SON HAD JUST GOTTEN A CAR, AND HE INSISTED ON TAKING ME. WE GOT TO BROAD AND WYOMING, AND I TOLD HIM TO GO HOME. MY OTHER SON WAS SITTING IN THE BACK. THERE WAS ANOTHER PERSON IN THE CAR THAT I DIDN'T SEE, HIDING UNDER JACKETS. IT WAS TERRELL.

MY RIDE CAME, AND I TOLD MY SONS TO LEAVE AND GO HOME. IT LOOKED LIKE THEY WERE ABOUT TO PULL OFF, BUT I PULLED OFF BEFORE THEY DID AND I DIDN'T SEE THEM LEAVE. I DIDN'T KNOW WHAT HAPPENED UNTIL I GOT HOME. MY DAUGHTER WAS IN KINDERGARTEN AT THE TIME. I DIDN'T KNOW TERRELL WAS IN THE CAR. I DIDN'T KNOW HE ROBBED SOMEBODY, AND THAT THE OTHER GUY HAD A GUN. I DIDN'T KNOW THEY SHOT EACH OTHER.

I FOUND IT ALL OUT LATER. MY SON TOLD TERRELL NOT TO DO ALL THAT, BUT TERRELL GOT OUT OF THE CAR. MY SON HEARD A GUN SHOT AND WENT TO LOOK FOR HIM. HE SAW TERRELL AT ONE END OF THE BLOCK, AND HE SAW THE GUY THAT TERRELL WENT TO ROB AT THE

OTHER END OF THE BLOCK. THEY HAD SHOT ONE ANOTHER. HE DIDN'T KNOW WHAT HAD HAPPENED AT THE TIME.

HE WENT TO GET HIS CAR AFTER HE SAW TERRELL ON THE GROUND, TO TAKE TERRELL TO THE HOSPITAL. THE CAR DIDN'T HAVE A REVERSE, SO HE HAD TO GO ALL AROUND THE BLOCK TO GET TERRELL. BY THE TIME HE CAME AROUND, THE POLICE WERE ALREADY THERE. MY SON WENT TO THE HOSPITAL, BUT THEY WOULDN'T TELL HIM ANYTHING. MY SON, JEROME, CAME BACK AND TOLD HIS DAD WHAT HAD HAPPENED. THEY WENT TOGETHER TO TERRELL'S GRANDMOTHER'S HOUSE TO TELL TERRELL'S MOM. HER NAME IS LOUSE. I KNEW HER—WE USED TO BE FRIENDS. JEROME AND HIS DAD TOOK TERRELL'S MOM TO THE HOSPITAL. BOTH TERRELL AND THE GUY WHO HE TRIED TO ROB DIED.

I DIDN'T KNOW WHAT WAS GOING ON. I HAD BEEN AT WORK. I WENT TO PICK UP MY DAUGHTER, AND WHEN I GOT HOME WITH HER, TERRELL'S MOTHER CAME DOWN THE STREET. SHE HAD HER HANDS FOLDED AND A TOWEL OVER THEM. SHE PULLED OUT A KNIFE. I PUSHED HER AWAY AND LOCKED THE DOOR. SHE BROKE MY WINDOWS. I TOOK MY 5-YEAR-OLD DAUGHTER TO MY SISTER'S HOUSE, AND THEN I WENT LOOKING FOR TERRELL'S MOM TO ASK WHAT WAS GOING ON. WHEN I FOUND HER, I TOLD HER WE COULD WORK OUT WHATEVER NEEDED TO BE WORKED OUT. LIKE I SAID, WE USED TO BE FRIENDS. SHE SAID TERRELL HAD MONEY THAT MY SON TOOK, BUT THAT COULDN'T HAVE HAPPENED AT THE HOSPITAL. SHE SAID THAT MY SON WAS THE CAUSE OF HER SON GETTING KILLED, AND SHE SAID HIS DEATH WAS MY SON'S FAULT. TERRELL'S MOTHER KNEW THAT HER SON CARRIED GUNS AND ROBBED PEOPLE, BUT I DIDN'T KNOW THAT. MY SON HAD NOTHING TO DO WITH IT. I THINK THIS WOMAN IS THE REASON WHY MY SON GOT LOCKED UP.

b. What do you remember about your loved one's interactions with the police?

WHEN THE COPS CAME TO LOCK JEROME UP, WE WERE AT MY SISTER'S HOUSE. THEY ARRESTED HIM AND TOOK ME DOWN TO THE STATION, TOO. IT WAS THE STATION AT BROAD AND CHAMPLOST. THEY LOCKED MY ARM TO THE LEG OF A CHAIR AND WOULDN'T EVEN LET ME USE THE BATHROOM.

THEY KEPT TALKING TO ME ABOUT A TEAR DROP TATTOO, IMPLYING I KNEW WHAT A TEAR DROP TATTOO MEANS. I DIDN'T. THEY TOLD ME THAT WHEN YOU HAVE A TEAR DROP TATTOO, IT MEANS YOU TOOK A LIFE. APPARENTLY, TERRELL HAD A TEAR DROP TATTOO, BUT I KNEW NOTHING ABOUT THAT. I DON'T REMEMBER HOW MANY HOURS THEY QUESTIONED ME.

THE POLICE HAD NO EVIDENCE, NO GUN, NO WITNESSES. ONE LADY SAID THAT SHE HAD SEEN MY SON AND TERRELL WALKING TOGETHER, BUT SHE DESCRIBED MY SON AS SHORT AND DARK SKINNED. MY SON IS TALL AND LIGHT SKINNED. HE DID NOT MATCH HER DESCRIPTION. BUT IN COURT, SHE POINTED HIM OUT. IT DIDN'T MAKE SENSE.

c. What do you remember about your loved one's interactions with their lawyer?

I HIRED A LAWYER, BUT HE DIDN'T DO ANYTHING. I WAS SUPPOSED TO TESTIFY WHAT I KNEW AND THAT MY SON WAS A GOOD PERSON—LIKE ABOUT HOW THE POLICE HAD LOCKED ME UP AND HANDCUFFED ME TO A CHAIR, AND ALSO THAT MY SON WAS NOT A BAD BOY. HE HAD NEVER ROBBED ANYONE, AND HE WAS AT BROAD AND WYOMING THAT DAY TO TAKE ME TO WORK. HIS IDENTICAL TWIN BROTHER HAD TAKEN CARS, BUT NOT HIM. MY SON'S LAWYER DID NOT PUT ME ON THE STAND. HE SAID THAT IT WOULDN'T HELP. HE ALSO SAID NOT TO PUT IN AN APPEAL BECAUSE THAT WOULDN'T HELP, EITHER. I THOUGHT, WHY WOULD YOU SAY THAT?

I GAVE THAT LAWYER TEN THOUSAND DOLLARS IN 1998. THAT WAS A LOT OF MONEY IN 1998. HE DIDN'T REPRESENT MY SON AT ALL. HE HAD A PICTURE OF JOHNNIE COCHRAN IN HIS OFFICE, SO I THOUGHT HE'D BE A GOOD LAWYER. BUT I WAS WRONG. I COULDN'T BE IN THE COURTROOM BECAUSE I WAS SUPPOSED TO TESTIFY. BUT I NEVER DID TESTIFY.

d. What do you remember about your loved one's interactions with the prosecutor?

MY SON ASKED ME TO ASK HIS LAWYER IF THE PROSECUTOR GAVE HIM ANY DEALS, AND THE LAWYER SAID NO. THERE WAS NO EVIDENCE TO SAY THAT MY SON DID THIS, EXCEPT FOR THAT EYEWITNESS WHO COULDN'T MATCH THE DESCRIPTION SHE GAVE. LOUISE, TERRELL'S MOM,

KEPT CALLING THE POLICE STATION SAYING THAT JEROME WAS DOING STUFF THAT HE DIDN'T DO. SHE SAID SHE COULD TELL MY IDENTICAL TWIN SONS APART, AND SAID IT WAS JEROME, NOT TYRONE, DOING ALL THESE THINGS.

e. What do you remember about your one's interactions with the judge?

I WASN'T ALLOWED IN THE COURTROOM BECAUSE I WAS SUPPOSED TO BE A WITNESS, SO I DON'T REMEMBER MUCH ABOUT THE JUDGE. I DIDN'T GET TO SEE THE TRIAL. I ONLY CAME INTO THE ROOM WHEN THE JURY CAME TO THEIR DECISION. WHEN THE LADY JUROR READ OUT THE STATEMENT SAYING THEY HAD FOUND MY SON GUILTY, SHE WAS CRYING.

f. Did the system work the way you expected?

NO, IT DID NOT. I DO NOT FEEL THAT MY LAWYER DID A GOOD JOB. THE REASON MY SON WANTED TO GO TO TRIAL IS BECAUSE HE KNEW THERE WAS NOTHING TO PROVE THAT HE DID THIS. HE THOUGHT THERE WAS NOT ENOUGH EVIDENCE TO SAY THAT HE DID THIS.

WHILE MY SON WAS INCARCERATED, THEY SAID THAT THEY WOULD OFFER HIM A DEAL IF HE CONFESSED TO DOING IT. BUT HE DIDN'T WANT TO TAKE THE DEAL, BECAUSE HE DIDN'T WANT TO SAY HE DID SOMETHING THAT HE HAD NOT DONE. IT'S STILL GOING TO BE ON HIS RECORD FOR THE REST OF HIS LIFE, THAT HE KILLED PEOPLE, BUT HE DIDN'T KILL ANYONE.

3. How did your son personally change since being sentenced to life?

a. What are some examples of such change?

HE CHANGED A LOT. WHEN HE FIRST GOT UP THERE, HE DIDN'T LIKE IT AT ALL. NOBODY WOULD. BUT HE REALIZED THAT THIS IS WHERE HE WAS GOING TO BE FOR THE REST OF HIS LIFE, AND THEN HE GOT INTO READING BOOKS. HE GOT HIS G.E.D., AND HE GOT DEGREES THAT HE SENT ME IN THE MAIL. HE GOES TO THE LIBRARY.

MY SON TOLD ME ABOUT THE COALITION TO ABOLISH DEATH BY INCARCERATION (CADBI) AND THE WORK THAT THEY DO. SOME OF THE

YOUNG PRISONERS COMING IN WILL LISTEN. HE TELLS THEM WHAT IT'S LIKE BEING BEHIND BARS. IF YOU CAN, YOU GET INTO BOOKS, LEARN SOMETHING, AND TRY DO SOMETHING WHILE YOU'RE THERE. MY SON MENTORS THE YOUNG BOYS THAT COME IN. SOME WANT TO LISTEN, AND SOME DON'T WANT TO LISTEN.

b. What factors led to change, if any?

HE KNEW WHAT HIS SENTENCE WAS. HE KNOWS THAT WITH A LIFE WITHOUT PAROLE SENTENCE, HE CAN'T GET OUT. BUT I TOLD HIM NOT TO THINK ABOUT THAT. I TOLD HIM THAT GOD HAS A SAY SO. I TRULY BELIEVE HE IS GOING TO COME OUT OF THERE, BECAUSE HE DIDN'T DO THIS. MY SON DECIDED TO DO SOMETHING AND LEARN SKILLS IN CASE HE GETS OUT. HE LEARNED A TRADE, SO THAT HE COULD START A BUSINESS OR SOMETHING IF HE GETS OUT.

c. How did the community inside a correctional institution help/hinder positive change?

HE IS AT SCI MAHANAY. HE SAW A FLIER FOR CADBI ON THE BULLETIN BOARD, AND HE IS A PART OF THAT ORGANIZATION.

d. How did the community outside the correctional institution help/hinder positive change?

I WOULD BE LOST WITHOUT CADBI. JUST SITTING AROUND, TALKING AND LISTENING IS VERY HELPFUL TO ME. THERE ARE PEOPLE WHO UNDERSTAND WHAT I AM GOING THROUGH. THERE ARE PEOPLE WHO CAN HELP PEOPLE LIKE ME AND UNDERSTAND WHAT LIFE HAS DEALT ME AND MY SON. SOME PEOPLE LIKE MY SON HAVE EVEN COME HOME.

MY SON WAS OVER THE AGE OF 18 WHEN HE GOT LOCKED UP. THROUGH CADBI, I LEARNED THAT THE BRAIN DOESN'T DEVELOP UNTIL YOU'RE 25. AS FAR AS I'M CONCERNED, I FEEL MY SON SHOULD BE CONSIDERED A JUVENILE SINCE HIS MIND WASN'T FULLY DEVELOPED. WHEN YOU DO SOMETHING AT THE AGE OF 18 OR 19, YOUR BRAIN DOESN'T REALLY KNOW HOW TO DEAL WITH WHAT YOU DID OR EVEN WITH WHAT YOU'RE ABOUT TO DO.

e. Did your son maintain contact with the community while incarcerated?

I HAD AN ANEURYSM AT THE AGE OF 48. MY SON WAS STILL LOCKED UP. I DIDN'T THINK I WAS GOING TO MAKE IT. IMAGINE LOSING YOUR MOTHER WHILE YOU'RE STILL IN THERE. I HAVE A VISUAL VISIT WITH HIM, OVER VIDEO, TODAY AT 6:00. HE TALKS TO FAMILY MEMBERS. BUT AS FAR THOSE WHO WERE SUPPOSED TO BE HIS FRIENDS? THEY WEREN'T REALLY HIS FRIENDS.

MY SON WAS NOT ABLE TO ATTEND MY FATHER'S FUNERAL. HE COULD HAVE ATTENDED, BUT IN HIS PRISON UNIFORM WITH SHACKLES ON HIS HANDS AND FEET. HE WOULD HAVE ONLY HAD 15 MINUTES TO SPEND WITH MY FATHER, AND WE WOULD NOT HAVE BEEN ABLE TO SEE HIM BEFORE HE WENT BACK UP TO THE PRISON. ALL OF THIS WOULD COST \$2000. HE THOUGHT IT WOULD BE BETTER IF HE DIDN'T ATTEND IN PERSON, BUT HE DID VIDEO VISIT. HE GOT A CHANCE TO SEE MY FATHER ON VIDEO VISIT. TO SEE HIM GO TO THE FUNERAL PARLOR IN PRISON UNIFORM, WITH SHACKLES ON HIS HANDS AND FEET, AND GUARDS AROUND HIM—I DIDN'T WANT THAT. A MONTH LATER, HIS GRANDMOTHER PASSED AWAY, SO HE WENT THROUGH THE SAME THING AGAIN.

f. How did your community change after your loved one was sent away?

TODAY, IN NORTH PHILLY (AT YORK AND CUMBERLAND, BETWEEN 18TH AND 19TH), IT IS SO BAD OUT HERE WITH THESE YOUNG PEOPLE PICKING UP GUNS. YOU CAN'T EVEN SIT ON THE STEPS ANYMORE. I'VE GOT TWO SMALL GRANDKIDS, AND I DON'T EVEN LIKE TO SEE THEM OUTSIDE. I WAS TALKING TO MY NEIGHBOR OUTSIDE ONCE, AND SOMEBODY STARTED SHOOTING AT HIM. MY NEIGHBORHOOD WASN'T SAFE AT ALL IN THE PAST, EITHER. BUT BACK THEN, YOU WOULD PICK UP YOUR HANDS AND FIGHT WITH THEM. TODAY, THEY COME BACK WITH A GUN.

A LOT OF PEOPLE SAID I HAD THE ANEURISM IN 2005 BECAUSE I WORRIED SO MUCH ABOUT JEROME, BUT I DON'T THINK THAT WAS THE CASE. I TELL MY OTHER SON THAT I'M MORE WORRIED ABOUT HIM BEING OUT HERE. IT SHOULDN'T BE LIKE THAT, BUT I'M MORE FOCUSED ON TYRONE BECAUSE IT IS WILD OUT HERE. HE'S BEEN SHOT TWICE ALREADY. HANGING OUT ON THE STREET IS NOT GOOD. I TELL MY SON, "IF

SOMETHING HAPPENS TO YOU, WHAT WILL THAT DO TO YOUR BROTHER WHO'S AWAY?"

LATELY, TYRONE HAS BEEN STAYING IN THE HOUSE. I'M DOING ALL RIGHT MYSELF. TYRONE HAS JUST STARTED GETTING HIMSELF TOGETHER AFTER 20 YEARS. HE HAD A REALLY HARD TIME—HE SAYS HALF OF MY HEART ISN'T HERE. THAT HALF OF HIS HEART IS HIS TWIN BROTHER WHO'S AWAY. JEROME ALSO HAS A SON WHO WAS REALLY UPSET. HE WAS 1 OR 2 AT THE TIME JEROME WENT AWAY, AND HE KEPT SAYING THAT HIS DAD ISN'T HERE. I COULDN'T HELP RAISE HIM. HE CARRIES JEROME'S PICTURE AROUND WITH HIM.

4. What has life been like for someone you know since being paroled?

a. Have there been any positive or negative interactions with the community?

THERE HAVE BEEN POSITIVE INTERACTIONS. THEY COME OUT AND DO SOMETHING TO HELP THE PEOPLE, THE NEIGHBORHOOD, AND EVEN THE PEOPLE BEHIND BARS. THEY ARE PUTTING BACK INTO THEIR COMMUNITY AND HELPING PEOPLE BEHIND BARS WITH THEIR STRUGGLES. THOSE WHO DIDN'T HAVE LIFE, THEY COME OUT DOING THE SAME STUFF THEY WENT IN THERE FOR.

b. How has the community changed since their release?

I DON'T REALLY THINK IT'S CHANGED. PEOPLE THAT COME HOME FOR LESSER THINGS, THEY GO RIGHT BACK IN. BUT PEOPLE WHO ARE PAROLED FROM LIFE, IT'S DIFFERENT. IT'S BEEN POSITIVE, VERY POSITIVE. THEY COME OUT AND DO A LOT OF THINGS TO HELP THE NEIGHBORHOOD AND HELP PEOPLE WHO ARE STILL INSIDE. THEY PUT BACK INTO THEIR COMMUNITY.

c. Has violence been a concern due to their release?

NO. WHEN THE LIFERS COME HOME, THEY PUT POSITIVE THINGS BACK INTO THE COMMUNITY. THEY TRY TO EXPLAIN TO THE YOUNG KIDS WHAT VIOLENCE IS, AND THEY TRY TO DO GOOD STUFF. THEM COMING HOME IS A VERY POSITIVE THING.

d. Over the years, the city has tried to address community violence. What have you noticed about these efforts?

I DON'T SEE MUCH OF WHAT THE CITY IS DOING ABOUT IT, BECAUSE THE SAME PROBLEMS ARE STILL HAPPENING EVERY DAY. IT'S NOT JUST IN NORTH PHILLY—IT'S HAPPENING EVERYWHERE. I DON'T SEE THE CITY HAVING ANY CONTROL OVER IT. PERSONALLY, I THINK THAT IF SOME OF THESE PEOPLE WHO ARE BEHIND BARS COULD COME OUT AND TALK TO THESE PEOPLE—THESE KIDS—THAT ARE PICKING UP GUNS, IT WOULD MAKE A BIG DIFFERENCE. THESE PEOPLE DON'T KNOW ANYTHING ABOUT INCARCERATION, OR HOW LONG YOU'RE GOING TO BE IN THERE FOR TAKING A LIFE. IT MIGHT HELP IF PEOPLE THAT WERE BEHIND BARS COULD COME OUT. IT WOULD GET THESE KIDS TO REALIZE, TO PICK UP A BOOK AND READ IT. THEY WOULD LEARN ABOUT THEIR HISTORY INSTEAD OF BLACK-ON-BLACK CRIME. THEY WOULD THINK ABOUT WHAT THEIR ANCESTORS DID TO GET THEM WHERE THEY ARE TODAY... THEY WOULD SEE THAT THERE'S ONLY TWO WAYS TO GO ON THEIR PATHS: BEHIND BARS, OR SIX FEET UNDER. THE SOLUTION IS TO PICK UP A BOOK, TO GET A JOB AND GET YOUR EDUCATION.

IF THERE WAS A PLACE WHERE THESE KIDS COULD GO, LIKE A COMMUNITY CENTER, IT MIGHT CHANGE SOME OF THEIR LIVES AROUND. IF THEY HAD SOMEONE PREVIOUSLY INCARCERATED GUIDING THEM AT A PLACE LIKE THAT, THEY MIGHT THINK ABOUT PICKING UP A BOOK AND CONTINUING THEIR EDUCATION, OR EVEN GOING TO COLLEGE.

I WISH THEY HAD SOMEONE LIKE THAT TO TALK TO. A LOT OF MOTHERS AND FATHERS DON'T TAKE TIME WITH THEIR KIDS. I THANK GOD THAT I'M STILL HERE—THERE WAS A TIME WHEN I ALMOST WASN'T. I HAVE MY DAUGHTER AND I HAVE GRANDKIDS, AND I MAKE SURE THEY ARE OKAY. MY SON WHO IS AWAY HAS TOLD ME THAT IF IT WASN'T FOR ME, HE DOESN'T KNOW WHERE HE WOULD BE RIGHT NOW. I TOLD HIM TO THINK POSITIVE BECAUSE GOD HAS A PLAN FOR HIM.

e. What do you think creates violence in your community?

I THINK IT COULD BE BECAUSE PEOPLE ARE HANGING OUT ON CORNERS. IT COULD BE THE DRUGS; IT COULD BE BECAUSE PEOPLE GET MAD ABOUT LITTLE THINGS, LIKE IF SOMEONE LOOKS BETTER THAN SOMEBODY ELSE; ONE THING IS THAT THERE ARE TOO MANY PEOPLE HANGING OUT ON

CORNERS. PEOPLE KNOW WHAT YOU'RE DOING, AND THAT'S NOT A GOOD THING. THERE ARE COPS ON THE CORNERS, AND THERE ARE GUY STILL THERE, AND THE COPS DON'T SAY ANYTHING. THEY'RE NOT DOING ANYTHING ABOUT IT.

I hereby swear, declare and verify under penalty of perjury, that the facts set forth above are true and correct to the best of my personal knowledge, information and belief pursuant to 18 Pa. C.S. § 4904.

Brent Harris
NAME Brent Harris

Dated: 10-7-21
Philadelphia, PA

Clarence Irvine
Sworn to and subscribed before me
this 7th day of Oct. 2021.

Commonwealth of Pennsylvania - Notary Seal
CLARENCE E. IRVINE, Notary Public
Philadelphia County
My Commission Expires January 15, 2022
Commission Number 1077323

EXHIBIT H

AFFIDAVIT/DECLARATION OF MARTHA WILLIAMS

Pursuant to 18 Pa C.S. §4904

Martha Williams was born and raised in Philadelphia and has worked as a union carpenter for 25+ years. As a young woman, she studied to be a carpenter and went through 4 years of joint apprenticeship training in Northeast Philadelphia. For over 20 years, Martha has worked as a public servant for the Philadelphia Housing Authority, mostly serving her neighbors in her own neighborhood of North Philadelphia. She is a member of the Northeast Regional Council of Carpenters and part of the caucus committee for Sisters in the Brotherhood of the United Brotherhood of Carpenters and Joiners of America.

Martha has raised 2 children of her own and has been a foster parent to 3 additional children, all of whom are now young adults. Her son Damir was sentenced to Life Without Parole for a 2nd degree conviction in 2017. Martha is known on her block to be a big sister who is highly respected and helps her neighbors resolve domestic disputes and potentially violent interactions through providing peer support and mediation. She was nominated by her neighbors to become Block Captain because of her strengths in communication, her strong relationships with the children and families on the block, her knowledge of resources that she brings to her neighbors, and for her caring and commitment to the health of all her neighbors. Throughout her own distress, Martha has remained committed to continue her community work in what she calls “neighboring.”

Martha is a leader in several organizations working on criminal justice reform, including Chair of Fight for Lifers, co-facilitator of the Participatory Defense Hub in North Philadelphia, part of the National Participatory Defense Network, and a leader in the coordinating committee and statewide legislative committee of the Coalition to Abolish Death By Incarceration.

I MARTHA WILLIAMS do verify swear that the answers to the below questions are true to the best of my knowledge:

- 1. Let’s talk about what was going on for your loved one before the arrest:**
 - a. What was going on in terms of work or school?**

DAMIR’S CASE HAPPENED IN SEPTEMBER 2017. HE HAD JUST GRADUATED IN JULY OR AUGUST FROM LINCOLN TECHNICAL INSTITUTE WHERE HE STUDIED PHLEBOTOMY. HE WORKED AT THE BLOOD BANK FOR A WHILE, AND LATER HE WORKED AT THE AIRPORT AND AT UPS. DAMIR WAS TRYING TO FIND HIS GROUNDING. HE WAS 21 YEARS OLD. HE ENJOYED WORKING AND SPENDING TIME WITH HIS FAMILY AND FRIENDS.

b. Living at home?

NO, HE WAS STAYING WITH FAMILY AND FRIENDS. HE WAS MOVING AROUND A BIT, HELPING PEOPLE OUT WHEN HE STAYED WITH THEM.

c. What do you remember about the neighborhood?

HE WAS LIVING IN THE ROXBOROUGH NEIGHBORHOOD AT THE TIME, STAYING WITH THE PASTOR OF HIS CHURCH. I CAN'T SAY I'M TOO FAMILIAR WITH THE NEIGHBORHOOD, SINCE IT'S NOT A NEIGHBORHOOD THAT I FREQUENT. BUT FROM WHAT I UNDERSTAND, IT'S A PRETTY DECENT NEIGHBORHOOD. DAMIR HAD A LOT OF FRIENDS FROM THERE, MANY OF WHOM CAME TO SUPPORT HIM AT HIS TRIAL.

2. Tell us about the incident that resulted in you or your loved one receiving a life sentence.

a. Where/when did the incident take place?

IN ROXBOROUGH, AT THE 7300 BLOCK OF HILL ROAD.

b. What do you remember about your loved one's interactions with the police?

BY THE TIME I WAS NOTIFIED, DAMIR WAS ALREADY BEING SHIPPED TO STATE ROAD. HE TOLD ME THAT THEY CAME AND GOT HIM FROM HIS JOB, BUT HE DIDN'T SHARE ANYTHING ABOUT THE QUESTIONING.

c. What do you remember about your loved one's interactions with their lawyer?

WE WENT THROUGH A COUPLE OF LAWYERS. WHEN HE WAS ORIGINALLY ARRESTED IN SEPTEMBER, I ENDED UP RETAINING A LAWYER. HIS CASE WAS DISCHARGED FOR LACK OF EVIDENCE IN FEBRUARY. THEY REARRESTED HIM AFTERWARDS. UNFORTUNATELY, I HADN'T FINISHED PAYING FOR THE FIRST LAWYER, SO HE GOT A COURT APPOINTED LAWYER THE SECOND TIME. I TRIED TO SEEK OUT HELP AND UNDERSTANDING FROM HIM. SOME FOLKS FROM THE PARTICIPATORY DEFENSE HUB WENT WITH ME TO HIS OFFICE, AND HE WAS NOT REALLY

HELPFUL AT ALL. AT THE PRELIMINARY HEARING, HE DIDN'T EVEN SEE DAMIR BEFORE THE HEARING. I WAS IN AWE THAT HE COULD REPRESENT HIM WITHOUT MEETING WITH HIM.

I APPLIED TO HAVE A NEW ATTORNEY APPOINTED. HE WAS MORE ATTENTIVE AND MORE COMMUNICATIVE. BUT HE PASSED AWAY. DAMIR GOT REAPPOINTED TO A THIRD ATTORNEY. THAT WAS A COMPLETE NIGHTMARE. IT WAS DIFFICULT TO GET HIM TO COMMUNICATE ABOUT WHAT HE NEEDED. THE MORE I TRIED TO GET HIM TO COMMUNICATE WITH ME, THE WORSE THINGS GOT.

I WANTED TO ASK FOR ANOTHER ATTORNEY, BUT THE FEEDBACK I GOT WAS THAT THE JUDGE WASN'T GOING TO ALLOW A NEW ATTORNEY. I FELT STUCK. THE TRIAL WAS 3 MONTHS AWAY, AND I DIDN'T FEEL LIKE HE COULD REPRESENT DAMIR. I THOUGHT HE WOULD ASK FOR CONTINUANCES, BUT HE WENT TO TRIAL WITHOUT ADEQUATE PREPARATION. AT TRIAL, WHENEVER DAMIR WAS TRYING TO TALK, HE SEEMED DISMISSIVE OF ANYTHING THAT DAMIR WAS TRYING TO SAY.

d. Did the system work the way you expected?

I DIDN'T KNOW WHAT EXACTLY TO EXPECT. I GUESS I EXPECTED THAT SOME JUSTICE WOULD BE SERVED. I THOUGHT THERE WOULD AT LEAST BE A SENTENCING HEARING WHERE WE COULD PRESENT MORE INDIVIDUAL INFORMATION ABOUT DAMIR. I THOUGHT WE WOULD BE ABLE TO PRESENT WHO HE IS AS A PERSON, WHAT HE'S DONE, HIS EMPLOYMENT. HE WAS ONLY 21, AND HE HAD NO PRIOR CONVICTIONS – ALL OF THAT SHOULD HAVE BEEN TAKEN INTO ACCOUNT. BUT WE COULDN'T DO ANY OF THAT BECAUSE OF THE MANDATORY SENTENCE OF LIFE WITHOUT PAROLE.

3. How did someone you know personally change since being sentenced to life?

DAMIR IS STILL STRUGGLING. I DON'T EVEN KNOW IF THE SHOCK HAS WORN OFF YET, AND HE'S BEEN IN FOR 2 YEARS NOW AND HE'S STRUGGLING WITH ADJUSTING. I'M STRUGGLING WITH ADJUSTMENT, TOO.

THERE'S ALSO THE LIFER I'VE BEEN VISITING FOR MORE THAN 24 YEARS, HE IS SOMEONE WHO DAMIR CONSIDERS TO BE HIS FATHER. HIS CHANGE HAS BEEN... I MEAN, I HAVE TO SAY I'VE WATCHED HIM BECOME A MAN.

HE NOW STUDIES LAW. HE WROTE ALL THE PRE-TRIAL MOTIONS FOR DAMIR WHEN THE LAWYERS WOULDN'T DO ANYTHING. HE CONSTANTLY SAYS, "WHAT CAN WE DO TO CHANGE THE WORLD? WHAT CAN WE DO TO CHANGE OUR COMMUNITY?" HE HAS BECOME A WHOLE DIFFERENT PERSON. HE'S DEFINITELY SOMEONE WHO NEEDS TO BE ELIGIBLE FOR PAROLE. HE SPENDS TIME WITH YOUNGER MEN WHO COME IN AND ARE FACING SIMILAR SITUATIONS IN THEIR LIVES. HE'S NOT THE SAME PERSON HE WAS WHEN HE WENT IN.

HE'S THE ONE WHO POINTED ME IN THE RIGHT DIRECTION WHEN DAMIR WAS ARRESTED. HE SENT ME TO PARTICIPATORY DEFENSE AT MOTHERS IN CHARGE. HE KICKED INTO HIGH GEAR, AND SO DID I. I NEVER TOOK OFF FROM WORK. I DON'T WANT TO SIT SOMEWHERE BY MYSELF THINKING AND BECOME MY OWN WORST ENEMY. HE SAVED MY LIFE. EVEN AFTER DAMIR'S CONVICTION, HE'S BEEN IN CONSTANT MOVEMENT. HE'S KEPT ME FROM A DARK PLACE THAT A LOT OF PEOPLE DON'T COME BACK FROM.

a. Did you/they maintain contact with the community while incarcerated?

IT'S EASIER TO WALK AWAY. IT'S EASIER TO FOCUS ON OTHER PEOPLE'S CASES THAN HIS. BUT I AM PROUD TO BE DAMIR'S MOM. THERE ARE SO MANY FAMILIES DEALING WITH SIMILAR THINGS. I'M JUST TRYING TO REACH OUT AND HELP OTHER FAMILIES. I'M IN IT FOR THE CHANGE.

b. How did your community or family change after you or your loved one was sent away?

WE MISS HIM. YOU SEE IT. YOU SEE IT IN THE KIDS. ME? I KNOW I'M NOT THE SAME. EVERYBODY JUST MISSES HIM ALL THE TIME, BUT WE DO WHAT WE CAN AS A FAMILY. WE TRY TO DO WHAT WE CAN. WE DON'T WANT HIM TO GET THE SENSE THAT HIS ROLE IS NOT VALUABLE TO US. WE DID A ZOOM PARTY FOR HIS BIRTHDAY THIS YEAR—HE TURNED 25. I HAVE GRANDDAUGHTERS AND NEPHEWS, WHO ARE HIS 2 NIECES AND COUSINS. THE MINUTE WE GET ON ZOOM, THEY TAKE OVER, AND I HAVE TO MAKE SPACE FOR THEM.

DAMIR IS THE OLDEST BOY COUSIN. HE STILL HAS TO BE A COUSIN TO THEM. HE CALLS EVERYBODY. THERE IS A VOID. IT HURTS TO SEE THE

KIDS HURT. KIDS ARE RESILIENT. THEY DO A GOOD JOB TALKING TO HIM, TALKING ABOUT HIM, WRITING HIM LETTERS, SHARING THEIR STORIES WITH HIM. THE FACT THAT HE'S GONE IS NOTICED. YOU CAN JUST TELL WHEN WE GET TOGETHER THAT HE IS MISSED. WE'RE A SMALL FAMILY, SO HOLIDAYS ARE ROUGH. DAMIR WAS THEIR BABYSITTER BEFORE HE WENT AWAY. AT THE TIME, THEY WERE 6 AND 7. THE COUSINS WERE 10 AND 13. THE KIDS ARE ALWAYS TALKING ABOUT HIM. IT REALLY IMPACTED THE COUSINS—THEY'RE BOYS, AND HE'S THE OLDEST BOY COUSIN. EVERYBODY IN THE COMMUNITY IS ALWAYS ASKING ABOUT HIM. IT'S NOTICED THAT HE'S GONE.

4. What has life been like for someone you know since being paroled?

ALL POSITIVE FROM ALL THE PEOPLE I KNOW WHO HAVE BEEN PAROLED. THERE'S AN INDIVIDUAL NAMED GHANI, THERE'S BLUE, THERE'S STEVE—THERE ARE SO MANY WONDERFUL THINGS THEY ARE DOING SINCE COMING HOME. I DON'T EVEN KNOW OF ANY NEGATIVE FROM SOMEONE WHO HAS BEEN PAROLED. THEY HAVE COMMITTED THEMSELVES ALONG WITH RESOURCES TO GIVE BACK TO THE COMMUNITY.

a. How has the community changed since their release?

WE'VE BECOME MORE AWARE ABOUT WHAT LED TO SOME OF THE INCARCERATION. THOSE WHO HAVE BEEN INCARCERATED HAVE CERTAINLY EDUCATED US ABOUT HOW TO COME BACK, AND ON WAYS TO COMBAT THE VIOLENCE. THEY ARE STILL WORKS IN PROGRESS—YOU DON'T RECOVER FROM THIS TYPE OF DAMAGE OVERNIGHT. BUT TO SEE ALL OF THEM DOING THE WORK IN THEIR COMMUNITIES, SHARING THEIR STORIES, WORKING, VOLUNTEERING, WATCHING THEM THRIVE. THERE'S PROBABLY A LOT MORE MEN AND WOMEN WHO NEED PAROLE ELIGIBILITY. WE NEED THE CHANGE THEY'RE BRINGING WITH THEM. THE BIGGEST IMPACT ON THE COMMUNITY IS GOING TO COME FROM THOSE WHO HAVE BEEN IMPACTED THEMSELVES.

THAT'S WHO WE NEED TO MAN THE COMMUNITY. WE NEED THESE FOLKS TO HELP COMBAT WHAT IS GOING ON IN OUR COMMUNITIES. WE NEED PEOPLE WHO ARE SUITED AND BOOTED FOR THE JOB. THEY HAVE BEEN IMPACTED AND HAVE TRAVELLED THAT ROAD—THEY KNOW NOTHING GOOD COMES OUT OF OVERABUNDANCE OF DRUGS AND GUNS IN THE COMMUNITY. MANY OF THEM HAD PEER COUNSELING ON THE INSIDE.

THERE'S SOMETHING TO BE SAID ABOUT SOMEONE WHO KNOWS WHAT YOU'RE GOING THROUGH.

b. Has violence been a concern due to their release?

NO. THAT'S WHY WE KNOW YOU CAN'T LOCK UP YOUR WAY OUT OF THIS.

c. Over the years, the city has tried to address community violence. What have you noticed about these efforts?

I DON'T KNOW ABOUT THE CITY, BUT I KNOW THE PEOPLE IN THE ORGANIZATIONS THAT ARE TRYING. AND THEY ARE TRYING. IT'S BETTER THAN NOTHING. IT'S ROUGH—HOW DO YOU GET THIS UNDER CONTROL AFTER THE RESOURCES HAVEN'T BEEN THERE FOR SO LONG? I'M GRATEFUL FOR THE INFLUX OF RESOURCES. I RAISED MY KIDS TO WAKE UP EVERY DAY AND APPROACH IT AS A NEW START.

I WON'T SAY IT'S THE CITY, BUT IT'S THE PEOPLE WHO LIVE IN THE CITY THAT ARE TRYING THE HARDEST. GROUPS LIKE FRONTLINE DADS, MOTHERS IN CHARGE, WHY NOT PROSPER, AND SO MANY OTHERS. THEY ARE TRYING TO CLEAN UP THE MESS THAT FOLKS MADE.

d. What impact have they had on your community?

I AM SURE YOU CAN FIND YOUNG PEOPLE AND EVEN ADULTS WHO ARE THANKFUL FOR THESE PROGRAMS. BUT THE DAMAGE HAS BEEN GOING ON FOR SO LONG THAT IT'S GOING TO TAKE TIME TO CORRECT IT.

e. What do you think creates violence in your community?

THE LACK OF EDUCATION. THE LACK OF LIFE SKILLS. THE LACK OF A GOVERNMENT THAT GIVES A CRAP. THE LACK OF COPING SKILLS—THAT COMES WITH EDUCATION. THE LACK OF TRAUMA-INFORMED CARE. THERE ARE A BUNCH OF TRAUMATIZED PEOPLE WALKING AROUND WITH TRAUMA AND WITHOUT KNOWING EFFECTIVE WAYS TO DEAL WITH IT. ALL OF THIS BREEDS THE OVERABUNDANCE OF DRUGS AND GUNS, ALONG WITH ANGER AND NOT KNOWING HOW TO DEAL WITH ANY OF IT OR MANAGE IT.

f. What can be done about it?

“HOW DO WE STOP?” IS A GOOD QUESTION. AT THIS POINT, I’M NOT EVEN SURE. I HEAR PEOPLE ARGUING, AND I TRY TO CURB WHAT I KNOW IS COMING. WE’VE BEEN SO WITHOUT—WE DON’T SEE WHAT COMES BEHIND OUR ANGRY REACTIONS. ALL WE SEE IS THAT WE’RE ANGRY, AND THAT NOBODY IS LISTENING TO US. THAT CAN BE CONFUSING IF YOU DON’T KNOW WHAT TO DO WITH YOUR ANGER.

WE DEFINITELY NEED ANGER MANAGEMENT RESOURCES, BUT THAT HAS TO START EARLY. SCHOOL-BASED TRAUMA INFORMED CARE WOULD BE A GOOD START, WHERE KIDS CAN HAVE OPEN CONVERSATIONS WITHOUT WORRYING ABOUT THEIR BUSINESS GETTING BACK TO WHOEVER. IT WOULD BE A PLACE TO EXPRESS YOURSELF WITHOUT IT BEING USED AGAINST YOU.

OLDER FOLKS HAVE A ROLE TO PLAY WITH KIDS, TOO. I SAY THAT BECAUSE I AM OLDER, AND I INTERACT WITH THEM. I’VE NOTICED AN UPTICK IN NEW MOVE-INS ON THE BLOCK. WE DIDN’T HAVE ANY KIDS LAST YEAR, BUT NOW WE HAVE ABOUT 20 KIDS ON THE BLOCK. AS I WATCH THESE KIDS GROW AND DEVELOP, I’M SURE TO INTERACT WITH THEM. I’M WORKING ON BRINGING RESOURCES ON MY OWN BLOCK THAT I WASN’T ABLE TO BRING TO MY OWN SON. THE SCHOOL KEPT SUSPENDING HIM, AND THAT WAS A NIGHTMARE. I DIDN’T SEE THIS SITUATION IN MY SON’S FUTURE, AND I DON’T WANT TO SEE THESE PARENTS GO THROUGH THE SAME THING.

THE LIFERS COMING HOME SHOULD BE USED AS CATALYSTS FOR THIS CHANGE BECAUSE THEIR MENTORSHIP IS PRICELESS. THEIR SUPPORT, THEIR THOUGHTS, THEIR EXPERIENCES CAN BE USED AS A GUIDE FOR THIS CHANGE.

THERE ARE SO MANY FAMILIES GOING THROUGH THIS, AND WE ARE ALL COPING. I AM GRATEFUL TO BE DAMIR’S MOM. I KNOW HE’S SPECIAL. THIS IS HARD ON TONS AND TONS OF PEOPLE. IT’S EASIER TO WALK AWAY. I AM GRATEFUL TO BE HIS MOM BECAUSE I HAVE IT IN ME TO KEEP FIGHTING. DAMIR IS MY BABY, AND I’M ROCKING OUT. THESE ARE ALL OUR BABIES—IF THEY PUT RESOURCES IN OUR COMMUNITIES, WE WOULDN’T HAVE TO DEAL WITH THIS. I’M IN THIS FOR CHANGE. IF DAMIR COMES HOME TOMORROW, I’M STILL STAYING IN THIS FIGHT FOR CHANGE.

I hereby swear, declare and verify under penalty of perjury, that the facts set forth above are true and correct to the best of my personal knowledge, information and belief pursuant to 18 Pa. C.S. § 4904.

Martha Williams
NAME

Dated: 10/7/21
Philadelphia, PA

Martha Williams

Clarence E. Irvine
Sworn to and subscribed before me
this 7th day of Oct. 2021.

Commonwealth of Pennsylvania - Notary Seal
CLARENCE E. IRVINE, Notary Public
Philadelphia County
My Commission Expires January 15, 2022
Commission Number 1077323.

EXHIBIT I

Last Name	First Name	Mid Name	Date of Birth	Race	Committing Date
BROWN	JACQUELINE		11/21/1937	BLACK	5/3/1989
FLETCHER	ANTHONY		12/13/1939	BLACK	5/16/1983
DIXON	CHARLES	R	6/14/1940	WHITE	11/1/1978
LEWIS	THELBERT	D	1/6/1941	BLACK	5/8/1987
BENNETT	EDWARD		2/10/1941	BLACK	9/25/1967
CAESAR	FLORENCE		8/25/1941	BLACK	10/14/1989
HUSSMANN	JOSEPH		8/22/1945	WHITE	12/3/1982
BRONSON	PURCELL		8/28/1946	BLACK	5/4/1979
SMALLS	LARRY	HOWARD	10/28/1946	BLACK	9/27/1971
MORRIS	JAMES	F	11/24/1946	BLACK	3/13/1980
DOOLEY	ANTHONY		12/26/1946	BLACK	10/5/1998
FOUCHE	ROBERT		10/30/1947	BLACK	10/24/1990
HAAS	CHARLES		11/14/1948	WHITE	4/30/1980
BESS	VERNON		11/16/1948	BLACK	1/27/1978
REID	LEONARD		4/26/1949	BLACK	12/5/1988
WILSON	RICHARD		6/14/1949	BLACK	12/13/1974
MANIGAULT	RALPH		6/22/1949	BLACK	9/9/1992
MITCHELL	WIDMARK		9/19/1949	BLACK	6/29/1990
RIVERS	CHRISTOPHER		10/20/1949	BLACK	10/28/1976
FEIGHERY	DONALD		11/23/1949	WHITE	2/28/1984
COOPER	CARL		12/21/1949	BLACK	5/16/1985
DAY	LONNIE		6/10/1950	BLACK	3/7/1990
CRAWFORD	NATHANIEL		8/7/1950	BLACK	2/23/2004
FELDER	CHARLES		8/18/1950	BLACK	12/24/1987
PERRIN	ROBERT		11/10/1950	BLACK	9/2/1976
APONTE	ANGEL		8/3/1951	HISPANIC	11/3/2003
JONES	DAVID		9/17/1951	BLACK	8/29/1977
NORRIS	BRUCE		10/13/1951	BLACK	1/21/1976
RIGLER	ROBERT		11/25/1951	WHITE	8/5/1977
WHITE	MICHAEL		12/8/1951	BLACK	7/26/1978
JEFFERIES	HARRY		2/22/1952	WHITE	11/29/1978
CANADY	RICHARD		3/21/1952	BLACK	12/30/1980
MOODY	JAMES	A	3/31/1952	BLACK	2/20/1979
TABRON	HARVEY		7/14/1952	BLACK	3/29/1977
DAVIS	EDWIN	L	8/4/1952	BLACK	2/25/1991
JONES	GARY	D	8/29/1952	WHITE	5/30/1986
JONES	DERRICK	C	9/3/1952	BLACK	10/21/1971
STATEN	HAROLD	E	11/10/1952	BLACK	2/15/1989
TAALIBDIN	SULAIMAN	MUJAHID	12/4/1952	BLACK	10/18/1974
BYRD	HADDRICK		12/9/1952	BLACK	1/14/1976
WASHINGTON	DARTHULAR		1/1/1953	BLACK	10/21/1988
MERRITT	MONROE		1/10/1953	BLACK	1/21/1985
MARLOWE	RICKY		2/5/1953	BLACK	2/22/1980
JONES	WILLIAM	T	2/23/1953	BLACK	11/23/1981
DILL	ALFRED		3/10/1953	BLACK	10/18/1976
MCCULLOUGH	RODNEY		4/8/1953	BLACK	6/16/1980

SANDERS	DOUGLAS		6/10/1953	BLACK	1/27/1983
GARWOOD	ALONZO		6/17/1953	BLACK	4/22/1981
MAY	HOWARD	EDWIN	7/23/1953	BLACK	12/22/1976
GILLARD	PRINCE		8/31/1953	BLACK	5/29/1981
HARDISON	JAMES		9/9/1953	BLACK	3/12/1982
CARTER	WILLIAM	R	12/9/1953	BLACK	11/22/1989
GILES	JAMES		12/9/1953	BLACK	12/7/1979
OBRIEN	KEVIN		12/29/1953	WHITE	11/10/1976
SHEPPARD	CHARLES		2/4/1954	BLACK	11/22/1978
BARNES	MICHAEL		2/18/1954	BLACK	4/21/1977
SIMS	BOBBY		3/21/1954	BLACK	12/28/1982
FOWLER	ERNEST		3/31/1954	BLACK	12/3/1976
BARBER	VIRGIL		4/8/1954	BLACK	10/6/1978
BROWN	STANLEY		4/25/1954	BLACK	7/1/1977
SPENCER	VINCENT		8/7/1954	BLACK	8/24/1987
MOORE	LARRY		9/20/1954	BLACK	12/14/1987
RAINEY	WILLIAM	C	10/31/1954	BLACK	1/17/1977
FORBES	ROBERT		11/1/1954	BLACK	2/25/1971
KISSELL	JOHN	JOSEPH	11/24/1954	WHITE	7/12/1977
ANDERSON	BENNIE		2/21/1955	BLACK	1/5/1976
WRIGHT	ANDRE		3/29/1955	BLACK	3/17/1983
BELL	LARRY	L	4/29/1955	BLACK	11/17/1983
CRUZ	ROBERTO		6/21/1955	HISPANIC	4/8/1986
SIMILA	WILLIAM	E	6/27/1955	WHITE	5/12/1988
COLEMAN	KEVIN		7/2/1955	BLACK	2/25/1986
GADDY	ALONZO		8/5/1955	BLACK	8/14/1978
SAUNDERS	THADDEUS	STEVEN	8/22/1955	BLACK	9/18/1975
REED	BRETT		9/17/1955	BLACK	12/19/2005
PERKINS	ROBERT		10/7/1955	BLACK	8/4/1975
MILLER	EUGENE		10/18/1955	BLACK	4/22/1981
BISHOP	GRADY		11/5/1955	BLACK	10/13/1977
MARTIN	CHRISTOPHER		11/10/1955	BLACK	6/4/1976
SMITH	CLARENCE		12/3/1955	BLACK	12/2/1981
JACKSON	DONALD		12/20/1955	BLACK	3/17/1989
HOLMES	CECIL		1/5/1956	BLACK	7/31/1980
HOWARD	ANDRE		2/8/1956	BLACK	12/24/1987
COOPER	BRUCE		2/24/1956	BLACK	4/20/1987
YOUNG	MARK		3/1/1956	BLACK	8/16/1976
DEATON	GERVIN		3/9/1956	BLACK	5/15/1975
JOHNSON	RONALD		3/27/1956	BLACK	4/23/1982
JONES	VARNADO	R	3/27/1956	BLACK	11/13/2012
VALDEZ	ANDRES	BELLIARD	3/27/1956	HISPANIC	10/31/1980
WINSTON	WILLIAM	DAVID	5/13/1956	BLACK	6/11/1976
LOWE	GREGORY		5/25/1956	BLACK	3/11/1976
MCCLOSKEY	MICHAEL		6/17/1956	WHITE	11/6/1987
HAND	MARCUS		6/21/1956	BLACK	5/15/1978
WILLIAMS	GILBERT		6/22/1956	BLACK	4/10/1980

BEST	EARL		9/3/1956	BLACK	5/13/1983
NELSON	JORGE	M	10/10/1956	BLACK	7/14/1989
CONN	JOHN		11/15/1956	WHITE	10/7/1981
ROS	SAMNANG		12/1/1956	ASIAN	3/6/2006
MACKLIN	OLIVER	I	12/24/1956	BLACK	9/26/1986
COLBERT	DARRELL		1/19/1957	BLACK	9/10/2003
SANFORD	MICHAEL		2/3/1957	BLACK	8/31/1983
TURNER	DAVID		3/21/1957	BLACK	4/12/1988
WALLACE	VINCENT		3/26/1957	BLACK	12/7/2012
RODRIGUEZ	MARIA		3/27/1957	HISPANIC	7/23/1981
PETERS	LEWIS		4/9/1957	WHITE	4/15/1981
HARRIS	HENRIETTA		4/10/1957	BLACK	8/3/1979
WALKER	ARTHUR		4/19/1957	BLACK	9/23/1986
THOMPSON	KEVIN		4/26/1957	BLACK	5/14/1992
HESS	JOSEPH		5/10/1957	BLACK	11/13/1986
SWISHER	GEORGE		6/1/1957	WHITE	3/1/2001
OBRYANT	JUNE		6/22/1957	BLACK	9/21/1978
EVANS	HARRY	L	8/1/1957	BLACK	10/17/1977
BUNDY	ANTONIO		8/17/1957	BLACK	10/6/1977
QUARLES	BRUCE	A	12/5/1957	BLACK	5/20/1982
SLADE	MIKAL		12/29/1957	BLACK	9/29/1987
BOYD	FRANCIS		1/13/1958	BLACK	2/14/1977
CLAY	MELVIN		2/6/1958	BLACK	7/18/1979
HUDSON	EDGAR		4/3/1958	BLACK	4/22/1980
JONES	JEROME		4/17/1958	BLACK	9/22/1986
ROUSE	DAVID	C	5/4/1958	BLACK	1/24/1980
ARCHER	JAMES		5/25/1958	BLACK	11/8/1974
WHITTINGTON	FELIX		5/29/1958	BLACK	4/25/1985
SEXTON	WARREN		7/3/1958	BLACK	11/27/1983
JACKSON	DAVID		8/23/1958	BLACK	5/3/1977
MURRAY	ANTHONY		9/8/1958	BLACK	4/6/1984
VEAL	TRAVIS		2/4/1959	BLACK	4/26/1989
DOCKERY	LAVERNE	A	2/16/1959	BLACK	6/3/1986
RAVENELL	LEONARD		3/4/1959	BLACK	3/21/1988
LUNSFORD	STANLEY		3/30/1959	BLACK	6/1/1989
KING	ARNOLD		4/24/1959	BLACK	5/1/1980
SUTTON	RICHARD		4/26/1959	BLACK	10/15/1981
LUPTON	GARY		5/1/1959	BLACK	12/2/1994
LYONS	MICHAEL		5/3/1959	BLACK	9/26/1986
TORAIN	ANTHONY		7/11/1959	BLACK	1/3/1983
SHAW	LARRY		8/3/1959	BLACK	5/14/1987
STEWART	ARTHUR		8/10/1959	BLACK	11/12/1981
FITZGERALD	TYRONE		8/28/1959	BLACK	3/11/1988
BUTLER	PRIMUS		8/30/1959	BLACK	2/28/1984
DICKSON	DARRYL		9/16/1959	BLACK	9/12/1983
SCHILK	THOMAS		9/26/1959	WHITE	1/15/1988
SCOTT	JOSEPH		10/21/1959	BLACK	4/24/1984

QUARLES	KEVIN		11/10/1959	BLACK	5/23/1986
FREEMAN	WENDELL	L	11/11/1959	BLACK	7/24/1992
MCCLURE	EUGENE		12/16/1959	BLACK	10/3/1989
WATSON	JEFFREY		1/7/1960	BLACK	3/12/1986
YOUNG	KARLESTER		1/10/1960	BLACK	12/31/1985
HOLDEN	GREGORY		1/26/1960	BLACK	4/25/1984
JOHNSON	KENYATTA		1/27/1960	BLACK	10/13/1989
MOBLEY	GARY		2/12/1960	BLACK	2/17/1981
DOUGHERTY	DANIEL		2/18/1960	WHITE	10/11/2000
MAYS	JEFFREY		3/7/1960	BLACK	4/28/1980
WATKINS	BRENDA		3/19/1960	BLACK	11/27/1987
ROWLETT	GARY		4/22/1960	BLACK	8/8/1996
EVANS	JOSEPH		5/18/1960	BLACK	9/14/1978
EBERHARDT	VERNON		5/21/1960	BLACK	4/30/1982
MURRAY	BRUCE		6/7/1960	BLACK	4/25/1984
HIRSCHFIELD	NORMAN		6/18/1960	BLACK	1/16/1981
BAINES	FRANKLIN		6/26/1960	BLACK	4/10/1978
ORTIZ	JOSE		7/28/1960	HISPANIC	6/10/1991
INGRAM	DERRICK		9/6/1960	BLACK	11/25/1992
MUCHINSON	DERRICK		9/15/1960	BLACK	5/2/1984
GREEN	ROBERT		9/16/1960	BLACK	4/6/1984
WALLACE	DARRELL		9/29/1960	BLACK	5/30/1995
COLLINS	JOHN	J	10/29/1960	WHITE	9/29/1982
WILLIAMS	FRED		11/11/1960	BLACK	1/20/1988
PETTYJOHN	LEROY		11/12/1960	BLACK	1/25/1983
COLEMAN	BARRY		11/16/1960	BLACK	2/25/1986
POTTER	HALGER		12/15/1960	BLACK	11/8/1984
WOODSON	RONALD		1/21/1961	BLACK	3/25/1983
BELLE	SAMMY		1/25/1961	BLACK	7/28/1983
CROSLAND	CURTIS		2/15/1961	BLACK	12/19/1988
WALKER	LARRY		3/5/1961	BLACK	2/14/1984
SOLOMON	PABLO	F	5/5/1961	HISPANIC	4/21/1988
LUCAS	TIMOTHY	R	5/6/1961	BLACK	11/23/1987
BASS	CHARLIE		6/11/1961	BLACK	7/6/1992
WILLIAMS	ARTHUR	L	7/3/1961	BLACK	10/28/1992
EVANS	REID		7/5/1961	BLACK	10/16/1981
GATEWOOD	BILLY	T	7/17/1961	BLACK	5/7/1982
BURKE	GREGORY		7/18/1961	BLACK	4/22/1987
BENSON	KENNETH		7/29/1961	BLACK	7/2/1981
THOMAS	KEVIN		8/27/1961	BLACK	1/28/1982
UPCHURCH	MICHAEL		9/5/1961	BLACK	9/14/1984
ARMSTEAD	CLYDE		9/15/1961	BLACK	6/6/1988
GODFREY	JESSE		9/15/1961	BLACK	5/2/1991
NICHOLAS	ROSS		9/19/1961	WHITE	3/17/1986
MCDONALD	ZACHARY	O	1/27/1962	BLACK	3/24/1997
HOLT	RONNIE		2/12/1962	BLACK	9/23/1991
WILLIAMS	QUINN		2/18/1962	BLACK	12/8/1981

NEAL	DERRICK	A	2/20/1962	BLACK	7/5/1994
WILCOX	ANTHONY	W	3/4/1962	BLACK	5/1/1981
MOJICA	FRANCISCO		3/11/1962	HISPANIC	2/3/1992
COTTON	LEROY	F	3/17/1962	BLACK	7/1/1982
MALDONADO	SAMUEL		4/3/1962	HISPANIC	1/19/1983
ADKINS	ERNEST		4/26/1962	BLACK	12/20/1982
ANDREWS	GUY		5/9/1962	BLACK	4/30/1982
PRESSLEY	HYLAND		6/29/1962	BLACK	9/25/2002
GARRETT	JOHN		7/18/1962	BLACK	5/2/1990
STEWART	ORLANDO		9/13/1962	BLACK	9/28/1982
EVANS	WYATT		9/15/1962	BLACK	12/8/1981
LASSITER	LORI	A	10/4/1962	BLACK	5/11/1990
SILAS	KEVIN		10/28/1962	BLACK	11/4/1982
HICKS	ROBERT		11/4/1962	BLACK	10/9/1991
MOSLEY	JEFFREY		11/12/1962	BLACK	10/11/1983
SMITH	ANTHONY		12/11/1962	BLACK	3/6/1985
COLLINS	MAURICE		12/31/1962	BLACK	7/6/1988
YOUNG	WALTER		1/24/1963	BLACK	12/4/2002
MAYFIELD	VINCENT		1/30/1963	BLACK	1/8/1999
RUFFIN	ROBERT	E	3/17/1963	BLACK	3/1/1982
FOGGIE	BRUCE		4/4/1963	BLACK	9/13/1982
COTTON	EARL	MANDEL	4/6/1963	BLACK	5/6/1988
LYNCH	RONALD	T	4/17/1963	BLACK	11/13/1986
BROWN	FLOYD		6/1/1963	BLACK	9/26/1983
IVEY	STEVEN		7/9/1963	BLACK	3/25/1982
DIAZ	TONY		8/16/1963	HISPANIC	7/2/1999
ROBINSON	MARK	A	8/22/1963	BLACK	9/22/1983
SMITHSON	ROBERT		9/22/1963	BLACK	12/2/1985
SEAWRIGHT	CHARLES		10/15/1963	BLACK	3/3/1983
ROBINSON	ROBERT	E	11/7/1963	BLACK	8/24/1983
GAUL	RICHARD		11/11/1963	WHITE	2/28/1984
FIELDING	BERNARD		12/12/1963	BLACK	6/24/1993
LILLY	MICHAEL		12/22/1963	BLACK	5/20/1994
MAYS	RONALD		12/27/1963	BLACK	4/10/1985
SCOLA	STEPHEN	M	1/7/1964	WHITE	2/9/1990
GULLY	GARY		2/11/1964	BLACK	1/11/1988
TERRY	WILLIE	A	6/21/1964	BLACK	5/30/1991
DOCKERY	TIMOTHY		7/17/1964	BLACK	11/21/1989
MARSH	DANIEL		7/23/1964	BLACK	3/27/1987
GREEN	DARRYL		8/26/1964	BLACK	9/23/1992
SPANN	ANTOINE		10/7/1964	BLACK	1/23/1992
WIGGINS	CARLISLE		10/18/1964	BLACK	2/25/1986
CALHOUN	TROY		11/27/1964	BLACK	6/3/1987
CRUMP	DENISE		12/21/1964	BLACK	6/23/1988
BROWN	WALLACE		2/7/1965	BLACK	9/14/1989
WAGSTAFF	JAMES		3/11/1965	BLACK	5/13/1991
SHEPPARD	DAVID		3/27/1965	BLACK	5/20/1994

JORDAN	TRACY	A	6/4/1965	BLACK	11/13/2006
WALTHOUR	OLIVER		7/14/1965	BLACK	3/16/1992
JORDAN	FRANK		8/30/1965	WHITE	2/29/1988
BRODNAX	DERRICK		9/1/1965	BLACK	4/2/1990
DRAPER	MARC		10/12/1965	BLACK	3/7/1986
HORTON	LEE	A	10/14/1965	BLACK	10/5/1994
BLAND	JEFFREY	L	10/19/1965	BLACK	4/10/1985
STOVER	GREGORY		11/27/1965	BLACK	11/23/1988
CRUZ	CARLOS		1/5/1966	HISPANIC	12/26/1995
ROSS	BRIAN		2/6/1966	BLACK	10/28/1992
JOHNSON	ANTHONY		2/25/1966	BLACK	4/27/1989
THOMPSON	MELVIN		2/25/1966	BLACK	11/17/1987
ARMSTRONG	GARY		3/2/1966	BLACK	8/5/2003
CRAWLEY	KEITH		4/3/1966	BLACK	4/13/1987
VANTRAN	TRANH		4/6/1966	ASIAN	3/4/1999
ANDERSON	WALTER		5/14/1966	BLACK	11/1/1988
TRUDEL	GEORGE		5/26/1966	WHITE	12/12/1988
BOND	JESSE		6/18/1966	BLACK	12/10/1992
WRIGHT	GARFIELD	H	6/25/1966	BLACK	5/8/1990
ROSADO	DANIEL		7/4/1966	HISPANIC	10/3/1986
TISDELL	ISHMAEL	A	8/14/1966	BLACK	1/19/1988
MAYS	ANTHONY		8/19/1966	BLACK	3/23/1988
BRAILSFORD	BRIAN		9/19/1966	WHITE	5/9/2001
HUMPHREY	THOMAS		9/22/1966	BLACK	4/7/1989
ECHOLS	LEONARD		12/19/1966	BLACK	8/14/2007
ABNEY	CLARENCE	E	1/12/1967	BLACK	10/9/1992
THOMPSON	ERIC	S	1/23/1967	BLACK	2/3/1994
WILLIAMS	ERIC		2/9/1967	BLACK	10/29/1990
POMPEY	FREDERICK	A	4/9/1967	BLACK	1/10/1990
TURNER	SHAWN	R	7/6/1967	BLACK	3/11/1991
MANNING	CURTIS		7/15/1967	BLACK	6/9/1989
DANIELS	EDWARD	N	7/24/1967	BLACK	12/7/2011
HOUSTON	RICHARD		10/4/1967	BLACK	1/15/1988
DEMATTEO	NICHOLAS		11/3/1967	HISPANIC	11/18/1992
RUDER	DAVID	R	11/17/1967	WHITE	4/10/1989
LINDSAY	ROBERT		12/2/1967	BLACK	3/18/1994
COLEMAN	TROY		12/21/1967	BLACK	7/19/1991
TEAGLE	DERRICK		2/15/1968	BLACK	12/12/1994
WATSON	DARRYL		3/2/1968	BLACK	1/31/1991
WILLIAMS	RONALD		4/11/1968	BLACK	3/1/1995
BROWN	TIMOTHY		4/24/1968	BLACK	7/10/1989
WILLIAMS	CORY		5/30/1968	BLACK	9/25/1992
DAVENPORT	ELMER	L	6/21/1968	BLACK	7/27/1992
JOHNSON	MARCUS		7/2/1968	BLACK	8/1/1991
HALL	ROBERT		8/5/1968	BLACK	4/13/1998
RIVERS	JAMES	S	9/7/1968	BLACK	3/16/1992
LONG	ALBERT		9/9/1968	BLACK	1/20/1998

WINDER	TIMOTHY		9/9/1968	BLACK	10/15/1991
DUKES	EARNEST		9/20/1968	BLACK	2/7/1992
BROOKS	ERIC		9/25/1968	BLACK	3/17/1992
EPPS	KEITH		10/28/1968	BLACK	12/8/2011
PAGE	GEORGE		12/16/1968	BLACK	10/29/1990
REEVES	GREGORY		12/20/1968	BLACK	9/23/1994
HARPER	TERRI		1/4/1969	BLACK	1/8/1993
CARTER	TERRELL		2/4/1969	BLACK	12/30/1992
EVERETTE	MAURICE		6/29/1969	BLACK	12/18/1995
JOHNSON	BARRY	T	6/29/1969	BLACK	5/20/1994
MILLINER	JOHN		7/6/1969	BLACK	12/18/1992
GARRETT	AARON		7/18/1969	BLACK	10/18/1991
AKIENS	FREDDY		8/4/1969	BLACK	6/2/1994
WHEELER	AARON		8/22/1969	BLACK	12/11/1992
MCGLONE	WARREN		9/17/1969	BLACK	1/2/1997
ELLISON	ELLIOT		9/23/1969	BLACK	4/21/1995
WILLIAMS	MARK		9/26/1969	BLACK	4/18/1994
WILLIAMS	ROBERT		10/3/1969	BLACK	8/24/1990
PEARSON	ANTONIO		11/26/1969	BLACK	2/19/1991
HILL	DWAYNE		12/29/1969	BLACK	10/15/1991
BURNS	RODNEY		1/13/1970	BLACK	11/23/1992
MCDOUGALD	DESMOND		1/13/1970	BLACK	3/18/1991
WILLIAMS	GEORGE		1/14/1970	BLACK	1/3/1992
DAVIS	SEAN		2/11/1970	BLACK	5/9/1991
MALLORY	BARRY		4/9/1970	BLACK	3/9/1992
RICE	CARVEL		4/15/1970	BLACK	3/7/1994
WILLIAMS	MITCHELL	S	4/30/1970	BLACK	5/15/1997
HAWKINS	NICHOLE		5/20/1970	BLACK	10/18/1995
HORTON	DENNIS		5/22/1970	BLACK	10/5/1994
STEVENS	ANDRE	L	5/30/1970	BLACK	6/13/1990
RODRIGUEZ	JOAQUIN		6/20/1970	HISPANIC	6/17/1991
SMITH	CHRISTOPHER		6/26/1970	BLACK	6/9/1992
DIGGS	DARRYL		8/30/1970	BLACK	11/18/1996
BROKENBOUGH	CHRIS		10/4/1970	BLACK	9/20/1990
ROLLINS	ANDRE		11/16/1970	BLACK	4/22/1994
RIVERA	CARLOS		1/3/1971	HISPANIC	3/19/2001
WIMBUSH	CHARLES		2/9/1971	BLACK	4/8/1993
COOPER	TROY		2/25/1971	BLACK	11/3/1993
NGUYEN	QUANGUAN		2/28/1971	ASIAN	3/4/1999
BUTLER	TIMOTHY		3/18/1971	BLACK	9/18/1990
SPINKS	JOSEPH		3/23/1971	WHITE	10/21/1993
ANDERSON	KEITH		4/4/1971	BLACK	5/4/1989
BENNETT	CARLTON		4/10/1971	BLACK	2/1/1993
PERRY	BRUCE	C	6/1/1971	BLACK	6/19/1998
HESDEN	CARLTON		6/29/1971	BLACK	11/7/1997
SCOTT	JAMAL		7/10/1971	BLACK	3/27/1992
ANDREWS	MICHAEL		9/22/1971	BLACK	5/15/1997

DURRANTE	ALLISTER		10/6/1971	BLACK	10/16/1995
MUSTAFA	AHMEEN		11/15/1971	BLACK	4/10/1996
ORTIZ	ANGEL		11/20/1971	HISPANIC	2/15/1991
COOPER	DARNELL		1/2/1972	BLACK	6/18/1993
VELEZ	JORGE		1/5/1972	HISPANIC	12/11/2006
CULMER	CORTEZ		1/9/1972	BLACK	7/18/2008
ADAMS	GARLAND		1/16/1972	BLACK	11/8/1991
MULLINS	MICHAEL		2/8/1972	BLACK	2/26/2002
KINARD	ANDRE		2/26/1972	BLACK	2/24/1992
TRAUB	BAYMAN		2/29/1972	BLACK	3/9/1994
COLON	ADAM		4/23/1972	HISPANIC	11/18/1992
SLAUGHTER	MATTHEW		4/30/1972	BLACK	6/16/1992
BOWMAN	MELVIN		6/24/1972	BLACK	12/17/1992
ABDULLAH	NAREE		8/9/1972	BLACK	3/18/1996
JOHNSON	ROY	D	8/30/1972	BLACK	3/16/1992
MCDONALD	MAURICE		8/30/1972	BLACK	1/30/2001
TRAN	LOC		9/20/1972	ASIAN	3/4/1999
JOHNSON	GARY		9/27/1972	BLACK	2/13/1995
WRIGHT	ANTHONY		9/27/1972	BLACK	10/15/1990
EVANS	KEVIN		10/26/1972	BLACK	12/18/1992
RANDALL	JIMALL		10/30/1972	BLACK	3/23/1992
HOWE	JAMES		12/20/1972	WHITE	9/15/1995
POLLER	CHRISTOPHER		12/22/1972	BLACK	8/26/1993
HARRIS	EARL	L	1/18/1973	BLACK	10/2/1992
ROBINSON	RONNIE		2/1/1973	BLACK	12/26/2018
CEO	WALTER		3/2/1973	BLACK	11/6/1995
CANTY	MARK		3/17/1973	BLACK	1/2/1997
GREENE	ERIC		4/10/1973	BLACK	12/16/1994
ZANDERS	VICTOR		4/22/1973	BLACK	5/17/1996
PARKER	RICHARD		4/27/1973	BLACK	9/29/1999
BENJAMIN	ERNEST		5/31/1973	BLACK	4/4/1994
AUSTIN	SEAN		6/24/1973	BLACK	11/20/2014
HAYNES	JOHN		7/13/1973	BLACK	6/12/1995
MOORE	JOHN		7/22/1973	BLACK	1/16/1997
MCDUFFY	DEMETRIS		8/7/1973	BLACK	10/6/1993
DICKERSON	KYLE		8/15/1973	BLACK	10/28/1996
CATAGENA	MICHAEL	A	8/29/1973	HISPANIC	1/23/1995
HAY	KENNETH		8/29/1973	BLACK	11/17/1994
RAMOS	LUIS		9/16/1973	HISPANIC	2/27/2006
SANT	DAH		10/10/1973	ASIAN	5/10/2000
PINKINS	CURTIS		10/16/1973	BLACK	2/2/2000
BELGRADE/BELGRAV	MARIO		11/9/1973	BLACK	4/21/1995
CARABELLO	ABEL		11/11/1973	HISPANIC	11/19/1992
CARTER	FRED		11/17/1973	BLACK	12/6/1991
MALDONADO	MARCO		11/18/1973	HISPANIC	10/12/1993
GROVES	ROBERT		5/14/1974	BLACK	11/12/1998
WILLIAMS	TOMMY		5/29/1974	BLACK	8/15/1994

WOODARD	ANNTONESA		6/2/1974	BLACK	10/23/2000
GREENLEE	GEORGE		7/9/1974	BLACK	6/20/1997
WOMACK	GREGORY		7/11/1974	BLACK	12/16/1994
ROBERSON	SHAMAR		8/10/1974	BLACK	3/15/1995
CRAWLEY	HAMEEN		8/25/1974	BLACK	1/2/1997
HESTER	JAMAL		8/29/1974	BLACK	11/15/1999
ARMSTEAD	JAMES		10/31/1974	BLACK	5/4/1998
SPADDY	JOHN		11/9/1974	BLACK	3/31/1995
WHITE	MARK		12/7/1974	BLACK	11/20/1997
HORTON	NAKIA		12/10/1974	BLACK	1/12/1998
STIDHAM	WINSTON		1/30/1975	BLACK	7/25/1997
BURTON	MICHAEL		3/22/1975	BLACK	9/23/1999
MONTANEZ	WILLIAM		4/18/1975	HISPANIC	7/3/1995
REED	KYLE		5/5/1975	BLACK	12/7/2012
PONE	CLARENCE		5/22/1975	BLACK	12/28/2018
MILLER	RASHEED		6/12/1975	BLACK	1/17/1995
PINCKNEY	THOMAS		6/22/1975	BLACK	9/23/1996
ADKINSON	BAJA	J	6/28/1975	BLACK	4/24/1996
WILLIAMS	RONALD	D	7/1/1975	BLACK	1/27/1997
ANDERSON	RAMEL		8/17/1975	BLACK	7/17/2006
SMALL	JEROME		10/1/1975	BLACK	6/9/1995
BARBER	HAYWOOD		10/15/1975	BLACK	12/8/1995
WASHINGTON	VINSON		11/14/1975	BLACK	1/9/1995
YELVERTON	KEVIN		11/28/1975	BLACK	10/26/2005
PAGAN	HERIBERTO		12/11/1975	HISPANIC	11/20/1996
LITTLE	ELLERY		1/1/1976	BLACK	3/13/1992
OCAMPO	PHILLIP		1/9/1976	HISPANIC	3/30/1995
MOORE	EUGENE		1/21/1976	BLACK	2/2/2004
KELSEY	JOSEPH		1/24/1976	BLACK	3/4/2014
JONES	ROBERT		5/2/1976	BLACK	5/2/2002
HOUSTON	RICHARD		7/17/1976	BLACK	12/24/1998
SCAFFE	RODNEY		7/17/1976	BLACK	5/11/1998
BOWEN	DWIGHT		8/18/1976	BLACK	2/23/2004
CAPERS	DONALD		9/9/1976	BLACK	10/21/1998
HART	TYREE		9/16/1976	BLACK	9/22/1997
LILLY	EARL		9/17/1976	BLACK	6/1/1998
THOMAS	ALBERT		10/14/1976	BLACK	3/9/1998
RAMIREZ	EDWARD		11/10/1976	HISPANIC	3/13/1998
EDWARDS	JULIUS		3/19/1977	BLACK	4/28/1999
JIMINEZ	CARLOS		4/4/1977	HISPANIC	12/1/1997
NAM	DAVID	H	4/10/1977	OTHER	2/23/2010
RODRIGUEZ	DAVID		5/9/1977	HISPANIC	12/17/1999
STRICKLAND	BRYHEIM		5/17/1977	BLACK	5/10/2000
CARSON	DAVID		5/19/1977	BLACK	1/13/2005
BENNETT	ANTOINE		7/3/1977	BLACK	12/11/1996
CONCEPCION	JOSE		8/20/1977	HISPANIC	5/24/1999
JEFFERY	DAVID		9/23/1977	WHITE	10/7/2010

MURRAY	TERRY		11/17/1977	BLACK	4/10/2006
HARVEY	MATTHEW		11/24/1977	BLACK	2/14/2007
RIVERS	TYREEM		11/27/1977	BLACK	9/18/1997
WALLACE	TYREE		11/30/1977	BLACK	12/2/1999
GLADDEN	JEHMAR		12/30/1977	BLACK	5/26/1999
JONES	LAVAR		1/2/1978	BLACK	11/27/2000
SPANN	PETER		3/3/1978	BLACK	1/22/2004
HARRIS	TYRONE		3/7/1978	BLACK	12/20/1999
HEYWARD	JOSEPH		5/3/1978	BLACK	5/13/2003
HAYNES	DAWUD		6/14/1978	BLACK	6/9/1994
WINSTON	CLAUDE		6/17/1978	BLACK	3/20/2009
BOONE	RASHON		6/21/1978	BLACK	7/12/2007
PAGAN	LUIS		7/22/1978	HISPANIC	1/19/1999
SHABAZZ	WALI		8/7/1978	BLACK	9/17/2004
MYER	ROBERT		8/14/1978	BLACK	12/20/2001
FOX	LEE	ANTHONY	9/10/1978	BLACK	6/24/1999
ALWAN	YUWSHA		9/21/1978	BLACK	8/21/2013
BRITTINGHAM	MARK		10/24/1978	BLACK	2/24/1999
COLLANTES	AL		3/30/1979	HISPANIC	6/2/2000
WILLIAMS	RAYSONNO		4/27/1979	BLACK	8/3/1998
TORRES	RAFAEL		4/29/1979	HISPANIC	4/20/2000
ROBINSON	HAKEIM		5/15/1979	BLACK	5/2/2002
SHULER	JERMEL		6/14/1979	BLACK	1/28/1999
WASHINGTON	MALIK		6/21/1979	BLACK	3/15/2002
MAYHEW	HASSAN		7/20/1979	BLACK	11/29/1995
SMITH	DAVIS		7/26/1979	BLACK	9/18/2001
HALL	ROLANDO		9/16/1979	BLACK	3/23/2006
BURNS	GERALD		9/18/1979	ASIAN	5/9/2001
LOPEZ	RICHIE		10/2/1979	HISPANIC	7/2/1999
MAPLE	ERIC		12/10/1979	BLACK	11/20/2000
WHITMIRE	MICHAEL		12/10/1979	BLACK	2/20/2009
SANDERS	JAY	T	1/10/1980	BLACK	4/16/2003
GONZALEZ	GABRIEL		1/26/1980	BLACK	2/23/2001
HAGLER	LEONARD		2/21/1980	BLACK	1/18/2007
YOUNG	ANTOINE		3/2/1980	BLACK	3/4/1999
SAUNDERS	LAMONT		3/30/1980	BLACK	3/16/2005
WILLIAMS	RONALD	O	4/21/1980	BLACK	1/19/2005
SMITH	LAWRENCE		5/16/1980	BLACK	3/6/2002
EVANS	MARK		6/18/1980	BLACK	10/5/2006
RICHARDSON	JAMES	A	7/27/1980	BLACK	9/13/2004
NELSON	RUSSELL		10/8/1980	BLACK	10/26/2000
DAVIS	TERRANCE		11/1/1980	BLACK	6/17/2002
GARCIA	MATTHEW		11/11/1980	HISPANIC	6/26/2000
DINWIDDIE	JUSTIN		12/18/1980	BLACK	2/10/2005
SMITH	AARON		1/21/1981	HISPANIC	5/22/2000
KELLAM	KAREEM		2/9/1981	BLACK	1/11/2008
BOND	LONDELL	A	3/2/1981	BLACK	5/18/2005

FURMAN	CERRONE		3/26/1981	BLACK	6/21/2005
HOWIE	MALIK		4/11/1981	BLACK	3/22/2007
WANAMAKER	DERICK		4/11/1981	BLACK	6/26/2003
WRIGHT	ANTONIO		4/11/1981	BLACK	12/6/2011
TALLEY	VINCENT		6/6/1981	BLACK	3/17/2000
HARVEY	SHERROD		6/10/1981	BLACK	5/8/2001
BAILEY	NATHANIEL		6/20/1981	BLACK	8/12/2005
GIDDINGS	GREGORY	RAHEEM	8/22/1981	BLACK	1/23/2015
VIALL	ROCCO		8/30/1981	WHITE	12/26/2003
RICHARDSON	JAMAAR		9/12/1981	BLACK	9/15/2004
EDWARDS	TYREE		10/15/1981	BLACK	6/19/2002
MCLAURIN	CHRISTOPHER		11/30/1981	BLACK	3/25/2002
LEANER	ERIC	L	3/16/1982	BLACK	5/8/2014
DOWNING	JAMAR		4/5/1982	BLACK	4/3/2007
GEORGE	REON		6/4/1982	BLACK	5/2/2005
WALLER	NAEM		9/5/1982	BLACK	11/13/2002
ALVARADO	OSCAR		11/10/1982	HISPANIC	8/5/2002
JOHNSON	JEROME		11/10/1982	BLACK	8/8/2005
MENDOZA	CHRISTOPHER		12/14/1982	HISPANIC	1/13/2006
SPURELL	STEPHEN		1/3/1983	BLACK	3/24/2004
BLACKWELL	ARNOLD		1/8/1983	BLACK	5/17/2004
ROUSE	DEVIN		1/8/1983	BLACK	2/16/2005
WASHINGTON	DARRELL		4/8/1983	BLACK	3/2/2011
OYNIAH	OBINA		4/14/1983	BLACK	6/6/2013
LATHAM	AMATADI		6/30/1983	BLACK	4/18/2005
KING	BRIAN		7/22/1983	BLACK	2/20/2007
BROWN	DONALD		8/13/1983	BLACK	11/5/2001
ALEXANDER	JOHN		12/20/1983	BLACK	5/21/2007
JOHNSON	MALIK		2/3/1984	BLACK	2/13/2002
LEWIS	MAURICE		2/25/1984	BLACK	1/15/2010
PORTER	FRED		5/2/1984	BLACK	5/3/2002
LAZAR	STEVEN		5/28/1984	WHITE	5/13/2010
BASS	TYREE		6/16/1984	BLACK	4/26/2010
BUMPAS	SHAWN		6/28/1984	BLACK	12/16/2004
VAZQUEZ	NELSON		8/27/1984	HISPANIC	12/7/2011
LAN	SAM		12/31/1984	ASIAN	5/9/2008
LEE	DARNELL		2/10/1985	BLACK	10/24/2008
MUMMA	JOSEPH		3/27/1985	WHITE	2/6/2007
ALSTON	KHALIAF	DE	5/24/1985	BLACK	4/16/2007
SMITH	MAURICE		8/7/1985	BLACK	9/21/2009
MCCORMICK	KINOLL		9/16/1985	BLACK	2/12/2007
MONROE	LAMARUS		11/12/1985	BLACK	8/5/2009
FRIEDLAND	EDWARD		11/19/1985	WHITE	9/24/2015
JOHNSON	DENNIS	B	1/4/1986	BLACK	11/4/2010
TRICE	ERNEST		3/26/1986	BLACK	3/12/2012
JAMES	WILLIE		10/12/1986	BLACK	12/2/2011
MONTGOMERY	JAMEL		11/20/1986	BLACK	12/21/2009

HAGWOOD	KIYIEM		11/21/1986	BLACK	10/29/2008
BREEDEN	WILLIAM	L	12/1/1986	BLACK	5/20/2008
JOHNSON	DEFOREST		12/31/1986	BLACK	5/17/2018
WARRINGTON	KEITH		1/23/1987	BLACK	4/15/2005
ROMANELLI	ANTHONY	M	1/25/1987	WHITE	2/6/2007
CASSEL	MYCHAL		2/25/1987	BLACK	5/15/2018
WILLIAMS	SHAWN	K	3/26/1987	BLACK	5/26/2010
MONTGOMERY	TYSON		4/16/1987	BLACK	9/12/2005
SAUNDERS	SAHEED	O	5/18/1987	BLACK	4/1/2013
GARNETT	ANTHONY		6/9/1987	BLACK	10/24/2011
DORSEY	RONALD		8/9/1987	BLACK	9/28/2017
BROWN	RAHEEM		8/12/1987	BLACK	11/6/2013
SMITH	EDWIN		9/20/1987	BLACK	5/7/2008
RANSOME	ISAIAH		10/1/1987	BLACK	6/26/2013
BENNETT	STEPHON		11/14/1987	BLACK	1/15/2010
HARRIS	KAHYAN		1/20/1988	BLACK	2/1/2013
PRATT	JALIL		8/4/1988	BLACK	9/22/2009
WOODS	MALIK		8/22/1988	BLACK	3/4/2014
MYATT	KYLIL		8/29/1988	BLACK	7/16/2009
AL-AMIN	MUHAMMAD		9/23/1988	BLACK	6/13/2012
DAVIS	TYRELL		10/3/1988	BLACK	1/19/2012
HARVILLE	JOSEPH	A	10/13/1988	BLACK	7/15/2011
TIRADO	ANDREW		11/2/1988	HISPANIC	6/25/2010
TIRADO	JONATHAN		12/13/1988	HISPANIC	7/21/2010
KINGWOOD	CURTIS		12/31/1988	BLACK	12/17/2014
MCCALLUM	AARON		1/7/1989	BLACK	4/2/2012
TATE	EDDIE		2/1/1989	BLACK	11/5/2009
ALEXANDER	TYRONE	S	2/21/1989	BLACK	11/28/2016
RODRIGUEZ	IVAN		3/3/1989	HISPANIC	5/29/2012
COSTNER	TERRELL		4/11/1989	BLACK	4/5/2012
WANAMAKER	LAMARR		5/8/1989	BLACK	1/30/2013
BRINKLEY	ALBERT		6/20/1989	BLACK	6/6/2013
SHIELDS	DERRICK		7/7/1989	BLACK	3/9/2020
RANSOME	JERRY		7/11/1989	BLACK	6/28/2013
DAVIS	FAHEEM		7/19/1989	BLACK	10/15/2014
GALES	ERIC	I	7/21/1989	BLACK	10/2/2013
GRIFFIN	DARNELL		10/28/1989	BLACK	11/21/2012
WALKER	SAM		6/17/1990	BLACK	3/13/2018
POWELL	BILAAL		8/17/1990	BLACK	6/5/2012
CANNON	DONTE		9/9/1990	BLACK	4/3/2012
VESSELS	ANDRE	L	11/11/1990	BLACK	11/25/2008
BROWN	JOHNNY	A	1/22/1991	BLACK	5/26/2010
CRADOCK	DONTA		1/24/1991	BLACK	6/4/2012
LOFTON	KEVIN		3/26/1991	BLACK	8/24/2011
GORDINE	SEAN		4/1/1991	BLACK	6/26/2013
HANDY	DWANE		4/11/1991	BLACK	6/5/2013
PACE	LADALE		4/26/1991	BLACK	8/15/2014

ABDUL-HAKIM	DAWUD		6/15/1991	BLACK	12/3/2013
ROBINSON	THOMAS		8/10/1991	BLACK	9/18/2014
SANMARCO	MARCO	A	2/17/1992	HISPANIC	12/8/2011
RODRIGUEZ	JONATHAN		3/15/1992	HISPANIC	12/8/2011
MUHAMMAD	KHAREE		3/16/1992	BLACK	3/3/2020
GREENE	WILLIAM		5/6/1992	BLACK	4/26/2017
PANKERY	MUNIR		6/6/1992	BLACK	3/17/2016
CARR	REGINALD		9/18/1992	BLACK	5/6/2015
MALONE	RASEAN		1/9/1993	BLACK	4/30/2015
JACQUES	DANTAE		3/29/1993	BLACK	7/24/2014
SPELLMAN	INDIA		4/28/1993	BLACK	6/7/2013
PETERSON	ZAKEE		5/20/1993	BLACK	11/15/2018
GARCIA	AR KEL	T	12/25/1993	BLACK	3/31/2015
WILLIAMS	DAMIR	K	6/6/1996	BLACK	5/31/2019
MASSEY	JAMIR		2/28/1997	BLACK	11/27/2018
SMITH	BRANDON		9/23/1999	BLACK	9/26/2017