

ORIGINAL

**IN THE COURT OF CRIMINAL APPEALS
OF THE STATE OF OKLAHOMA**

FILED
COURT OF CRIMINAL APPEALS
STATE OF OKLAHOMA

AUG 27 2021

**JOHN D. HADDEN
CLERK**

JULIUS DARIUS JONES,



Appellant,

vs.

THE STATE OF OKLAHOMA

Appellee.

Case No. D-2002-534

OBJECTION TO NOTICE PURSUANT TO 22 O.S. 2021, § 1001.1(D)
REGARDING EXECUTION DATE

JULIUS DARIUS JONES, through undersigned counsel¹, objects to the Notice Pursuant to 22 O.S. 2021, §1001.1(D) Regarding Execution Date filed by the State of Oklahoma on August 25, 2021 asking the Court to schedule Mr. Jones's execution date. It is not appropriate for the Court to schedule an execution date for Mr. Jones at this time for the following three reasons.

First, Mr. Jones still has remedies available in the federal district court proceedings challenging the constitutionality of the lethal injection protocol that Oklahoma intends to use to carry out his execution. Mr. Jones can and will ask for relief under Fed. R. Civ. P. 59(e) to vacate the judgment of dismissal, to vacate the Fed. R. Civ. P. 54(b) entry of partial, final judgment and, alternatively, to seek a stay of entry of judgment under Fed. R.

¹ Undersigned counsel appears only for the limited purpose of presenting these matters to the Court on behalf of Mr. Jones.

App. P. 8. That motion is being prepared and will be filed promptly when completed and well before the September 8, 2021 deadline for its filing.

Second, the Oklahoma Pardon and Parole Board has scheduled a hearing on Mr. Jones' request—originally filed on October 15, 2019—for the commutation of his death sentence.

And finally, on May 1, 2021, the Oklahoma Pardon and Parole Board's Investigator recommended that Mr. Jones's death sentence be commuted to either Life Without Parole or Life, with immediate parole eligibility. (Ex. A.) While the Investigator's report is not binding on this Court, it is nonetheless highly relevant to the inquiry under 22 O.S. 2021, §1001.1, which concerns the appropriateness of scheduling an execution date, by indicating that Mr. Jones's conviction and resulting death sentence are highly questionable.

In this context, it would be inappropriate and unjust for this Court to accept the State's invitation to run roughshod over Mr. Jones's state and federal constitutional rights to due process and the heightened reliability that the Eighth and Fourteenth Amendments demand in capital cases by scheduling Mr. Jones's execution before his state and federal remedies are resolved.

I. Scheduling an execution date is inappropriate because Mr. Jones has federal remedies remaining in the lethal injection litigation

Rule 59(e) of the Federal Rules of Civil Procedure provides: "A motion to alter or amend a judgment must be filed no later than 28 days after the entry of the judgment." Fed. R. Civ. P. 59(e). Mr. Jones, like the other plaintiffs in the pending federal litigation, has up to and including September 8, 2021 to ask the federal court to alter or amend its judgment

in that matter, and he intends to make that request. As referenced above, the relief Mr. Jones will seek under Rule 59(e) includes vacating the judgment against him based on, among other things, additional facts relevant to the grounds on which judgment was entered against him and legal grounds that require vacating the judgment. Alternatively, Mr. Jones will move the federal district court for a stay of its judgment pending appeal. Fed. R. App. P. 8(a).

As an additional matter, the federal district court intends to conduct a trial in early 2022 to determine whether the same three-drug protocol that the State of Oklahoma would use to execute Mr. Jones, were this Court to schedule his execution, violates the Eighth Amendment prohibition against cruel and unusual punishment. The federal court denied the State's motion for summary judgment to dismiss that claim on August 11, 2021, finding genuine issues of material fact as to whether the protocol in question does, in fact, violate the Eighth Amendment.

The trial on this important constitutional question will likely occur no later than February 2022. Mr. Jones was dismissed from the case simply because he opted on religious and moral grounds not to elect how he would prefer to be killed. The grounds for the dismissal specific to Mr. Jones are the subject of the aforementioned Rule 59(e) motion through which Mr. Jones will put before the federal court additional facts and legal grounds that warrant vacating the judgment dismissing him as a plaintiff.

II. Scheduling an execution date is inappropriate because a commutation hearing is scheduled on Mr. Jones's request for relief from his conviction and death sentence

On October 15, 2019, Mr. Jones filed an application for commutation of his death sentence with the Oklahoma Pardon and Parole Board (hereafter “the Board”). (Ex. B.) Since that time, Mr. Jones has diligently supplemented his Commutation Application with evidence relevant to the Board’s consideration of his request for relief from his convictions and death sentence. *See, e.g.*, Ex. C (Mr. Jones supplementing his Commutation Application with “an Affidavit of Roderick Wesley” who “is the third person to swear under oath that Christopher Jordan, the co-defendant in Mr. Jones[’] case, confessed to killing Paul Howell”). Mr. Jones has also timely answered questions posed by the Board throughout the course of its investigation into the merits of his Commutation Application. (*See* Ex. D.)

After nearly two years since his Commutation Application was first submitted and approximately five months after the Board voted to afford Mr. Jones a Stage 2 hearing on his Commutation Application, *see* K. Query-Thompson, Oklahoma Pardon and Parole Board grants Julius Jones a ‘stage two’ commutation hearing, Oklahoma News4 (Mar. 8, 2021), <https://kfor.com/news/local/oklahoma-pardon-and-parole-board-to-consider-hearing-for-julius-jones/>, Mr. Jones now has a commutation hearing scheduled to occur on September 13, 2021 (Ex. E at 1.)

That delay is not attributable to Mr. Jones. First, the Board sought guidance from the Oklahoma Attorney General about whether it had the authority under the Oklahoma Constitution to consider commutation requests filed by death row prisoners. *See* Kayla Branch, Oklahoma attorney general to decide if death-row inmates can receive commutation, Tulsa World (Jun 11, 2020), <https://tulsa-world.com/news/local/crime-and->

courts/oklahoma-attorney-general-to-decide-if-death-row-inmates-can-receive-commutation/article_b8afe7ae-bfd1-5d6f-9a2c-534f25922a83.html. On June 30, 2020, the Oklahoma Attorney General advised the Board that it had the authority to do so. *See* Kayla Branch, Oklahoma attorney general tells Pardon and Parole Board it already has the power to hold commutation proceedings for death-row inmates, Tulsa World (June 30, 2020), https://tulsaworld.com/news/local/crime-and-courts/oklahoma-attorney-general-tells-pardon-and-parole-board-it-already-has-the-power-to-hold/article_03553283-5ba9-55bd-884c-8fd766f9449e.html.

Next, the Board prudently determined that it needed to design a process for and promulgate rules governing its consideration of Commutation Applications in complex matters such as death penalty cases, and those new rules will take effect in September 2021. *See* Okla. Pardon and Parole Board, Administrative Rules, <https://www.ok.gov/ppb/documents/Title%20515%20-%20Chapter%2015%20-%20Rules%20-%202020.12.07.pdf> (last visited Aug. 26, 2021). The Board has thus scheduled Mr. Jones's commutation hearing for as soon as is practicable under its new rules and procedures. At that hearing, the Board will vote on whether to recommend that Mr. Jones's death sentence be commuted. If the Board votes to commute Mr. Jones's death sentence, that recommendation will proceed to Oklahoma Governor Kevin Stitt who will decide whether to accept or reject the Board's recommendation. If the Board declines to recommend a commutation of Mr. Jones's death sentence, or if the Governor rejects a favorable recommendation from the Board to do so, then Mr. Jones's death sentence will remain intact.

With these important issues nearly resolved, it is simply not appropriate for this Court to schedule Mr. Jones's execution date on the cusp of a commutation hearing to which state law entitles him. Not only would the Court's scheduling of an execution date at this juncture tread on powers belonging to the Oklahoma Executive Branch—including to decide whether to hold a commutation, rather than a traditional clemency, hearing in a capital case; but that also puts in jeopardy Mr. Jones's state and federal due process rights. U.S. Const. amend. XIV; Okla. Const. art. 2, § 7.

III. Scheduling an execution date is inappropriate in light of the Oklahoma Pardon and Parole Board Investigator's recommendation that Mr. Jones's death sentence be commuted

On May 1, 2021, the Investigator for the Oklahoma Pardon and Parole Board submitted an investigative report on Mr. Jones's Commutation Application. (*See* Ex. A.) The Investigator made two recommendations following careful review of the record and numerous other factors, including: (1) the Oklahoma County District Attorney's version of the crime; (2) Mr. Jones' account of the offense; (3) Mr. Jones's prior felony convictions; and (4) Mr. Jones's disciplinary record. (*Id.*) Those recommendations were: "Option 1: Commute to Life Without Parole Potential Release Date: N/A Parole Date: N/A Option 2: Commute to Life Potential Release Date: Life Parole Date: Immediate parole eligibility/next available docket." (Ex. A at 8.)

Those non-death commutation recommendations are consistent with the conclusions of Clinton Johnson, a former Oklahoma Department of Corrections official and former Member of the Oklahoma Pardon and Parole Board, who reviewed Mr. Jones's prison file. (*See* Ex. F.) Mr. Johnson opines that "[t]hroughout Mr. Jones' time on death

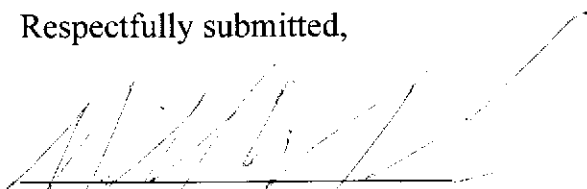
row his behavior has been reported as excellent or outstanding[,]" that Mr. Jones's "incarceration record does not reflect a history of violent behavior while in prison[,]" and that Mr. Jones "could successfully transition to the community provided he has a strong support system in place; a residence; employment or potential employment; transportation; a positive mentor; and access to medical/mental health assistance if needed."² (Ex. F, ¶¶ 15, 26.)

In light of this, the Court should decline to set an execution date for Mr. Jones at this time or, in the alternative, defer consideration of the State's request until after Mr. Jones's scheduled commutation hearing, which will take place in just over two weeks.

IV. Conclusion

Because it is inappropriate to schedule Mr. Jones's execution date for the foregoing reasons, and since the State will suffer no prejudice by returning to this Court after Mr. Jones' state and federal remedies are resolved, Mr. Jones respectfully asks that the Court decline the State's invitation to schedule Mr. Jones's execution date.

Respectfully submitted,



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² Importantly, Mr. Jones has been offered support and employment in the event that his death sentence is commuted to a non-custodial sentence. (See Ex. G.)

CERTIFICATE OF SERVICE

I certify that a copy of this document was served on the Attorney General of Oklahoma by depositing a copy with the Clerk of the Court of Criminal Appeals on the date that it was filed.



MICHAEL W. LIEBERMAN

EXHIBIT A

INVESTIGATIVE REPORT
STARTED BY: Lisa Reading
SUBMITTED BY: Lisa Reading
DATE REPORT COMPLETED: 05/01/2021

DOCKET/TYPE: 06/2021 Commutation

FACILITY/SECURITY: OSP/Maximum

NAME: JULIUS D. JONES

PERSONAL APPEARANCE: No

NUMBER: 270147

AGE/SEX: 07/25/1980 (41/M)

RECEPTION DATE: 04/29/2002

REBILL DATE:

OFFENSE COUNT: 1

OFFENSE: #Murder I

SENTENCE: Death

COUNTY: Oklahoma County

CF: 99-4373

OFFENSE HISTORY: None

Prior Board Consideration: 3/2021 Stage I Commutation - Passed to Stage II

JAIL TIME: 0 days

CRD: Life w/o Parole

PRD/CR: Life w/o Parole ()

NUMBER PRIOR INCARCERATIONS: 0

NUMBER OF OTHER CONVICTIONS: 8

PAROLE ELIGIBILITY AUTHORITY: Commutation

LAST BOARD CONSIDERATION: None

NEXT BOARD CONSIDERATION: None

1. CC AND/OR CS CASES OR DETAINERS:

CS: Possession of Firearm AFC1F, Count 2, 15 Years, Oklahoma County, CF 99-4373, (CS to controlling sentence)

2. DISTRICT ATTORNEY'S VERSION:

On July 28, 1999 Julius Darius Jones murdered Paul Scott Howell in front of Mr. Howell's two young children and sister for the purpose of stealing his vehicle. Please accept this letter as the State of Oklahoma's request that you deny Jones's request for a commutation hearing.

Over the last few years, Julius Jones and his attorneys have engaged in a coordinated and alarmingly successful of misinformation, spurred by media frenzy which is specifically targeted to manipulate and mislead the public through dissemination of half-truths and, frequently, outright lies. I respectfully submit this letter for the one simple fact that Jones would have this Board disregard: Truth matters.

In his commutation application, Jones states that prior to trial he "had gotten into trouble previously, but none of it was violent." That is patently untrue. More than year before he killed Paul Howell, Julius Jones began engaging in an escalating pattern of criminal conduct. On March 11, 1998 he was caught by employees at the Foot Locker in Quail Springs mall attempting to shoplift merchandise under his shirt. When the clerk attempted to stop Jones and give him an opportunity to simply put the merchandise back, Jones instead shoved the clerk to the ground and attempted to flee. However, he lost his footing and was apprehended by the store manager.

Jones acquired his first adult felony conviction in the fall of 1998, while he was still enrolled as a freshman at the University of Oklahoma, when he applied for a state photo ID card using another individual's name and birth certificate. He pleaded guilty to the crime of Unlawful Use of a False or Fictitious Name on an Application for Oklahoma Identification Card in Oklahoma County Case No. CF 1998-8657 on December 1, 1998, and was placed on a 3 year deferred sentence. The next day he was arrested by Oklahoma City police after leading officers on a pursuit that reached speeds of 70 mph on city streets and 50 mph in a residential area.

One week later, Jones was caught by a loss prevention officer at a Midwest City Target store attempting to steal some pagers from the electronics department. That same day, he also pawned a CD player that had been stole from WalMart the day before, averring that he had owned the item for two months. On May 26, 1999, Jones to the crimes of Larceny of Merchandise From Retailer in Oklahoma County Case No. CF 1998-7151 and Making False Declaration of Ownership to Pawnbroker and Concealing Stolen Property in Oklahoma County Case No. CF 1999-401. He was sentenced in both cases to concurrent one-year suspended sentences, with the first thirty days to be served in the county jail, and his deferred sentence in CF 1998-8657 was accelerated to a suspended sentence as well.

Notably, exactly two months before Jones was sentenced in these cases, his OU transcript reflects he had completely withdrawn from OU after being placed on academic probation his first semester with a 0.8 cumulative GPA. A letter from OU later found in his room during the execution of a search warrant also revealed that Jones had lost his financial aid because he failed to complete a minimum number of academic hours, and he failed GPA.

On March 3, 1999, Jones was arrested by Norman police officers driving a stolen Honda Accord. When officers allowed him to reach into the vehicle to purportedly retrieve his identification, Jones instead reached for a loaded handgun under the driver's seat, ignoring officers' commands to show his hands. Officers were able to pull him away from the vehicle and arrest him; Jones admitted to them that he was not allowed to have the gun because he was a convicted felon.

On March 18, 1999, Norman police officers caught Jones hiding in some bushes outside of a bank at 3:38am. He had a ski mask, gloves, and a water pistol painted to look like a real handgun on his person.

Nineteen days before murdering Paul Howell, Jones committed an armed robbery at the Royal Jewelers jewelry store inside Quail Springs Mall. On July 9, 1999, just after the store had opened, Jones approached the store owner and placed a gun to his head. At that time, Jones wore a pair of women's stockings pulled down over his head and a bandana tied around the bottom half of his face, and a pair of gloves. When the store's phone rang, he said, "Don't pick up the phone or I will shoot you." Scared for his life, the victim allowed Jones to take whatever he wanted, which turned out to be every gold chain in one of the store's cases. He later gave some of the chains to Christopher Jordan and his then-girlfriend, Annaliese Presley; Jordan helped him pawn most of the rest.

A couple of weeks later, Jones committed back-to-back car-jackings at the Hideaway Pizza on Western Avenue in Oklahoma City. On July 21, 1999 - exactly one week before the murder of Paul Howell - he ambushed Dr. Vernon Hoffman after he and his two friends, who were visiting from England, were leaving the restaurant. The two other men were already seated in Dr. Hoffman's Lexus in the parking lot when Mr. Jones, wearing a bandana over his face and gloves, pressed a gun to the side of Dr. Hoffman's head. He ordered Dr. Hoffman, "Get in and drive." When Dr. Hoffman didn't move, Jones took the keys from him and forced him into the back seat of the car. Jones then started to drive the car away. Fortunately, Dr. Hoffman had the presence of mind to yell for the others to "run for their life," and the three men were able to bail out of the moving vehicle and run for help. Jones fled with the Lexus. At the murder trial, Annaliese Presley testified that Jones called her on the phone and told her that he had a Lexus and she would "look cute in it." Presley assumed he had stolen the Lexus because he did not have money for that kind of car. According to Christopher Jordan, Jones quickly sold the Lexus to an individual near Rose State College in Midwest City for \$4,000. Law enforcement later recovered the vehicle in Midwest City. All of the owner's contents were missing.

The next night, Jones accosted Dr. Anon Lapsi as he was leaving the restaurant from having dinner with friends. When

Dr. Lapsi reached his new Mercedes-Benz in the parking lot, Jones, again wearing a bandana over the bottom half of his face, held a gun directly at Dr. Lapsi's head and demanded, "Give me the keys. Give me the keys." He then drove the car away. Police eventually recovered the Mercedes in the parking lot of Jones' Norman apartment. All of the owner's contents were missing. After the killing of Paul Howell, Edmond crime scene investigators located the keys to Dr. Lapsi's Mercedes in a Cutlass shared by Jones and Jordan as they processed the vehicle for evidence of the murder. Dr. Lapsi positively identified Jones as the armed robber both at the preliminary hearing for the robbery case and the murder trial. On June 13, 2006, Jones pleaded guilty to the crimes of Robbery With Firearm and Possession of a Firearm After Felony Conviction in Oklahoma County Case No. CF 1999-5144.

On the evening of July 28, 1999, 45 year old Paul Howell, a father and well-respected Edmond businessman, and his sister, Megan Tobey, took Mr. Howell's seven-and-nine year old daughters to the Target at Penn and Memorial in north Oklahoma City to do some back-to-school shopping. After loading their new backpacks and school supplies into Paul Howell's Suburban, the family made a spur-of-the-moment decision to get some ice cream on their way home. Shortly after 9:00pm they made their way through the drive-thru of the Braum's ice cream store located off of Broadway Extension near Memorial Road, then proceeded home.

What Mr. Howell could not know was that his murderers were following close behind. Earlier that afternoon, Julius Darius Jones and his close friend, Christopher O'Neal Jordan, set out to steal a Suburban. They had learned from Jones's robberies of the Lexus and Mercedes the week before that it was difficult to off-load stolen foreign made vehicles. They had been advised they would have better luck disposing of GMC products. They also knew that the vehicle would be worth more money if the column were not punched and the keys were with it. With that aim in mind, Jones and Jordan set out in the bronze 1972 Cutlass Supreme they were known to share, roaming the streets of Edmond looking for a Suburban to steal.

Around 2:00 or 3:00pm, one of Jordan's neighbors, Eckie Prater, observed Jordan driving his Cutlass slowly down the street then pull into the driveway of the home of the Nichols family, who owned two new Suburbans. Both vehicles were gone that day, however, as the Nichols were on vacation, and the Cutlass pulled out and drove away. Prater observed that sitting next to Jordan in the passenger's seat was another black male, who he described as being in his "late teens, early 20s" with hair "close to his head."

Jordan testified that he drove Jones around for a while that afternoon, looking for a Suburban. They passed several in business parking lots and driving along the roads. But Jordan testified that they ultimately decided it would be better to wait until it got dark outside. By around 9:00pm, they saw a brown Suburban pull into a Braum's drive-thru, and decided they had their target.

At the same time, Michael Peterson and his wife were sitting on the curb in front of the Braum's eating ice cream when they observed the bronze Cutlass circle the parking lot a couple of times and back into a parking space. A few minutes later, the Cutlass drove away with no one ever exiting or entering the vehicle. Peterson testified that there were two young black males in the car, who both appeared to be in their early twenties. He described the driver as having "corn roles" in his hair and one of them as wearing a white shirt. At the trial, Christopher Jordan confirmed that he and Jones had backed into a parking space at the Braum's waiting for Paul Howell's Suburban to leave the drive-thru.

After getting their ice cream, Mr. Howell drove his family back to his parents' Edmond home where he and his girls were staying at that time. Jones and Jordan stalked close behind. Paul Howell pulled into his parents' driveway and Jordan stopped his Cutlass a little ways down the street. As the Howell family gathered their ice cream and new school supplies out of the Suburban, Jones exited the Cutlass, gun in hand, and put on gloves, a stocking cap, and pulled a red bandana over his face.

Paul Howell had just opened his car door and stepped out of the vehicle when Jones approached him and pressed a .25 caliber Raven pistol to the left side of Mr. Howell's head. Jones then fired. The weapon was shot at such close contact to Mr. Howell's head that the skin around the entrance wound was seared with the shape of the gun's barrel and sight. The gunfire came with no warning. Megan Tobey testified that she had not even seen the gunman approach. She had just turned to the back seat to tell the girls to make sure they had everything when she heard a gunshot. She then heard the shooter say, "Where are the keys? Where are the keys?" By the time she turned back around, the shooter was already reaching into the car with the keys in his hand. Ms. Tobey immediately grabbed her nieces out of the back seat and ran for the house. She estimated they had taken about five steps when the shooter yelled at them "Stop!" and fired his gun again. Mercifully, the three were able to escape into the house uninjured.

Because Jones disguised his face, Ms. Tobey was not able to positively identify him as the shooter. She described the gunman as being a black man wearing a white t-shirt and a black stocking cap. He had a red bandana foiled like a triangle tied around his face, covering everything below his eyes. The stocking cap covered the top of his head down to "probably the top of his eyebrows. And it came above where his ear goes on about a half an inch to an inch." She testified, "I could see no braids."

The Howell family called 911, and first responders were on the scene within minutes. Paul Howell's father immediately ran outside to check on his son, but by that time the Suburban was gone and Mr. Howell was lying unresponsive in the front yard. He was pronounced dead shortly after arrival at the hospital.

As the Oklahoma Court of Criminal Appeals found in affirming Julius Jones's convictions and sentence, "the evidence presented against Jones was overwhelming."

Edmond crime scene investigators quickly began processing the scene after Paul Howell was transported away by ambulance. They located two spent .25 caliber shell casings in the driveway. The medical examiner later removed the

fatal .25 caliber projectile from Mr. Howell's head.

Meanwhile after the murder, Christopher Jordan testified he drove the Cutlass from Edmond to the northwest Oklahoma City apartment of Ladell King, who was supposed to help him and Jones find a seller for a stolen vehicle. Jones arrived at King's apartment complex about fifteen minutes later driving Mr. Howell's Suburban. Ladell King and his girlfriend, Vickson McDonald, both testified that Jones arrived in the parking lot after dark on July 28, 1999, in the Suburban. Jones backed the Suburban into a parking spot under a carport then got out to speak to Mr. King. King's neighbor, Gordon Owens, was also standing outside that night and confirmed that he saw Julius Jones, whom he had met before, standing next to the Suburban talking to King and gesturing toward the vehicle.

Ladell King described Jones that night as wearing a black stocking cap on his head, a white t-shirt, dark jogging pants, a red bandana hanging from his neck and brown cotton gloves on his hands. King testified that when he first approached the Suburban, Jones told him not to touch it. King looked in the vehicle and saw a child's book bag sitting on the seat. Jones asked King, "Get ahold of your boy?" referring to Kermit Lottie, who was known to run a chop shop and was expected to buy the stolen vehicle. King indicated he had not contacted Lottie. Jones asked King if he could use the phone, and King led him into a vacant apartment across from his with a phone that they usually used. King overheard him talking to a girl on the phone. Jones and Jordan then left in the Cutlass around 10:30pm. They left the Suburban overnight in the parking lot. Jones paged King around midnight that night. King called him back, and Jones asked if he had talked to Lottie about the Suburban yet. He responded that he had not.

Christopher Jordan testified that he and Jones drove from to his brother, Laymon Jordan's, house on the south side of town. Annaliese Presley also testified that Mr. Jones told her he was at Laymon Jordan's house the night of the murder. That night, Jones told Christopher Jordan about the robbery. He said "that he was hiding behind a tree and as he came out of the tree a little girl waved to him and said hi." And that is when he claimed the gun went off "on accident." The following morning, Christopher Jordan dropped Jones off at his parents' house, and Jordan drove to his grandmother's house, where he was staying at that time.

Later that afternoon, King paged Jones, Jones called him back, and King told him he needed to move the Suburban. Jones asked if he had gotten in touch with anyone about buying the vehicle, and King confirmed that he had. Jones called him back a short time later and said he could not find Christopher Jordan, so King picked him up at his parents' house in northwest Oklahoma City.

King testified he and Jones drove together in King's Firebird and discussed moving the Suburban. They arrived back at King's apartment complex, and Jones got into the Suburban. King drove the Firebird with Jones following behind in the Suburban to Central Grocery, a convenience store located in southeast Oklahoma City, four blocks from Kermit Lottie's auto shop. Jones and King then went into the convenience store and purchased some snacks. The store's surveillance video, which captured both men in the store that afternoon, as well as still images taken from the video, were admitted at trial.

Because King knew Lottie did not allow to bring stolen vehicles directly to his shop, they left the Suburban parked outside the store and both rode in the Firebird to the shop. Kermit Lottie testified that King pulled up to his auto body shop that afternoon in a red Firebird. Lottie could tell there was someone he did not recognize sitting next to King in the passenger seat. He testified that he had not met Julius Jones before. King and Lottie both testified that King talked to Lottie about buying a Suburban. However, Lottie quickly became suspicious when he realized the description King gave of the Suburban matched the description given on the news of a Suburban stolen during the murder of an Edmond man the night before. He told King he did not want to get involved with that vehicle because a man had been killed.

After briefly stopping by the Suburban in the Central Grocery parking lot, King drove Jones back to King's apartment and let him use the phone in the vacant apartment. Christopher Jordan and Ladell King both testified that around 5:30pm, King drove Jones to the gym where Jordan was playing basketball.

3. OFFENDER'S VERSION OF INSTANT OFFENSE:

In the summer between his freshman and sophomore year of college at Oklahoma University, he spent time away from his apartment near campus in Norman and back home with his parents and siblings in Oklahoma City. Chris Jordan was a person he played on the basketball team with at John Marshall High School, and they reconnected earlier in the year in 1999 after bumping into one another at a basketball game. On July 28th, 1999, Chris and his girlfriend came to his parents' house in the morning in his girlfriend's red Geo Prism. Chris had a 1972 Cutlass that had broken down, and he was going to go with Chris that morning to Auto Zone to help get the battery recharged. Around lunch time Chris drove him to see his girlfriend at the accounting firm she worked at. He saw her for about 20 minutes and then Chris drove him to Chevy's Garage to pick up his car which was in the shop for transmission repair. The mechanic needed parts to repair the transmission, so he took the car back. On the way home, the transmission was leaking fluid and smoking. They ran into Ladell King, who was a friend of Chris's and who he had met through Chris a few weeks earlier, and Ladell flagged him down. Ladell lived close by and said he could park his car outside his apartment until he could figure out how to get the car back

to the shop. That was around 4:00pm. Chris dropped him off at his parents' house around 4:30pm. They were planning to go to his apartment in Norman so he could get some clean clothes and Chris was going to pick him up later in the day. Chris didn't come back to pick him up until much later that night. He remembers being mad at Chris because he was supposed to come get him much earlier. While he was waiting for Chris, he played games with his sister and brother and around 8:00pm his mother, father, sister, brother and he had a spaghetti dinner. The dinner sticks out in his mind because it was close to his birthday and one of his friends had given him a large birthday cookie. Sometime after dinner he went to get the cookie and there was only one piece left because his brother and sister had been eating it behind his back. Between 9:30 and 10:00pm, his mother drove his brother to work. He was at home when she left and home when she returned. He told her about his birthday cookie being gone when she returned. Between 11 and 11:30pm that evening, Chris finally picked him up and they drove to his apartment in Norman. He and Chris had words because Chris was so late. Chris seemed a bit off and told him he got into it with some guys and shot at them. He was shocked but didn't ask any questions. His thought at the time was the less he knew the better. He and Chris left Norman around 2:00am and headed back to Oklahoma City. They hung out at the apartment of Chris' brother, Laymon Jordan, between 2:30 and 3:00am. They talked, drank, played dominos and, at some point, he fell asleep. Early the next day Chris drove him to pick up his car. Chris followed him to Championship Auto where he dropped off the car to get the transmission repaired. Chris then dropped him off at his parents' house around 8:30am and he went to sleep. Sometime during the day Ladell started paging him looking for Chris. He told Ladell that he didn't know where Chris was, and Ladell asked him to help move a car since he could not reach Chris. Ladell said he would give him something (which he understood to be money) if he helped. He needed money so he agreed and Ladell picked him up around the corner from his parents' house in a red Firebird. Ladell kept asking if he knew where Chris was. When they got to Ladell's apartment, Ladell asked him to follow him in a Suburban that was parked there. That made him suspicious and he refused because he was pretty sure the Suburban was stolen based on stories he'd heard from Ladell about how he would steal cars and change the serial numbers. Ladell instead drove the Suburban and he followed in Ladell's car. Ladell parked the Suburban at the grocery store and went inside. After a minute, he went into the store. He doesn't remember if Ladell bought anything. They left the store and drove together in Ladell's Firebird to the auto shop. He later learned (after he was arrested) that the auto shop was a chop shop run by a man named Kermit Lottie. Ladell went into the garage while he waited in the car. Ladell returned 10 or 15 minutes later and looked spooked. The drove in silence back the to grocery store where the Suburban was parked and Ladell sat parked behind it for several moments as if thinking. Ladell said the garage didn't want the Suburban because there was "a body on the truck," or something like that. He didn't know what Ladell was talking about, but he had a bad feeling and should have bolted and gone to the police, but he didn't. Ladell seemed obsessed with find Chris, so he suggested that he (Ladell) look for him at the Macklanburg Recreational Center where they played ball. They saw Chris's Cutlass parked outside and Ladell walked in. He walked into the gym after Ladell and could see him and Chris having what looked like a serious discussion. Ladell left the gym in his car, and Chris drove him back to his parents' house. Chris insisted on turning on the news. It was then that he learned that someone had been killed the night before in a robbery of a Suburban. Chris left, but left his car at his parents' house. He thinks at that point things were starting to add up to him that Ladell and Chris were involved. He should have gone to the police, but he didn't. That was stupid and he regrets it, but he was becoming concerned for his family's safety. After midnight on Friday, Chris called and asked him to pick him up at a laundromat because he was locked out of his grandmother's house. He was insistent. Because he left his car at his parents' house, he took Chris's car to pick him up and they drove back to his parents' house. He went to the living room couch to watch TV and called some girls on the family phone, then fell asleep. Chris said he needed to make calls

and went upstairs to use the other phone line in his bedroom. (Looking back, he is sure that's when Chris hid the gun and bandana that the police later found in that room) By the time he woke up later Friday morning Chris was gone. After cutting the grass, he was on the phone with a friend and received a call on the other line from Ladell. (He later learned Ladell was in police custody and calling him from outside the house. The call was short. Ladell asked what he was doing and he told him he was talking to a girl. A second call came in and the person on the other end asked him if he was home. He knew something wasn't right and figured it had to do with Chris. He knew Chris was up to no good, but didn't want to be in the middle of it, so he said that Julius wasn't there and hung up. He left to find out what was going on. He didn't sneak out or jump out of a window. He left from the door in the back of the house that they always used to come in and go out of. He noticed several police vehicles on his block. On the next block, he ran into Chris, who was walking towards his house and said we should drive to Ladell's apartment to find out what was going on. Ladell's girlfriend told them that the police had Ladell. Chris told her not to worry about it and that he was going to talk to the police. When they got back in the car Chris asked him to tell his brother Laymon the police were looking for "us." He understood that to mean Chris and his brother, not Chris and him. Chris got out of the car near Macklanburg. He thought Chris was going to talk to the police like he said. He agreed to tell Chris's brother what was going on. He was arrested early Saturday morning in Laymon's apartment because he was afraid to go back to his house. He was in shock when he was arrested, handcuffed, and dragged to a police car. The officers were high-fiving one another and told him: "You know you're gonna fry." While being transferred from an Oklahoma City police car to an Edmond police car and officer removed his handcuffs and said, "Run n----r. I dare you, run." He stood frozen, knowing that if he moved, he could be shot and killed. He feels horrible for Mr. Powell and his family. He should never have helped Ladell move the Suburban and would not have done so if he knew what truly happened. He wishes he had talked to the police. He has been haunted by those terrible decisions every day for the past twenty years. He knows Ladell and Chris framed him to save themselves, but he absolutely did not commit this crime and was wrongfully convicted. He went to trial. He was found guilty and sentenced to death. His state and federal appeals have concluded. He is before this Board asking for his death sentence to be commuted to time served. (Interview Questionnaire 4/28/2021)

Date Interview Conducted: N/A

4. CHRONOLOGY OF PRIOR FELONY CONVICTIONS:

Count 1, Unlawful Use of Fictitious Name in Application for Oklahoma ID, 3 years deferred, 12/01/1998, Oklahoma County, accelerated to 1 year (30 days county jail, balance suspended) 5/26/99, expired 5/25/2000

, CF 98-7151

CC: Count 1, Larceny of Merchandise From Retailer, 1 year (30 days county jail, balance suspended), 05/26/1999, Oklahoma County, expired 5/25/2000

, CF 98-8657

CC: Count 1, Making False Declaration of Ownership to Pawnbroker, 1 year (30 days county jail, balance suspended), 05/26/1999, Oklahoma County, expired 5/25/2000

, CF 99-401

CC: Count 2, Concealing Stolen Property, 1 year (30 days county jail, balance suspended), 05/26/1999, Oklahoma County, expired 5/25/2000

, CF 99-401

Count 1, Robbery With Firearm, 12 years, 06/13/2006, Oklahoma County, discharged 4/5/2017

, CF 99-5144

CC: Count 2, Possession of Firearms, 12 years, 06/13/2006, Oklahoma County, discharged 4/5/2017

5. OTHER RELEVANT INFORMATION:

Offense Code	Offense Description	Sentence Count	Sentence Length in Years			Mode	Frequency of the mode	Mode Percent of all Sentences
			Minimum	Maximum	Average (Mean)			
No data available.								

Reference the DANR: Space limit reached for section; remainder of the protest letter is available for viewing on WebExtender.

6. EVALUATION OF PREVIOUS ADULT COMMUNITY SUPERVISION:

OK, Suspended, 05/26/1999, Expired 05/25/2000, Committed additional felonies., (J&Ss), (3 cases, 4 counts)
OK, Deferred, 12/01/1998, Accelerated to Suspended 05/26/1999, Committed additional felonies., (Acceleration Order, J&Ss)

7. EVALUATION OF ALTERNATIVE RELEASE PROGRAMS:

None

8. INSTITUTIONAL TRANSFERS:

None

9. DISCIPLINARY RECORD:

Date of last Misconduct Report: 03/23/2020

Total Misconduct Reports: 5

Past Year: 0

Violent or S/A related misconducts 2-10 years old:

03/23/2020, Disobedience to Order (A)

, Oklahoma State Penitentiary, Inspector General investigation concluded that Jones used inmate phones during his scheduled work period, and participated in a conference call not initiated by facility administration.

03/06/2020, Possession of Contraband (X)

, Oklahoma State Penitentiary, Possessed a charging cord for a cell phone.

10. SUBSTANCE ABUSE & MENTAL HEALTH HISTORY & TREATMENT:

Substance Abuse

None

Substance Abuse History & Treatment (offender)

Admits weekly use of alcohol and marijuana ages 15 to 19. (Interview Questionnaire)

No ASUS available.

Mental Health History & Treatment (offender)

Mental health code: 0 - No mental health history. (OMS)

Treatment

None

11. DOCUMENTED VIOLENT BEHAVIOR:

Shoved a store manager to the ground while attempting to shoplift 3/11/98. Identified as the perpetrator of a jewelry store robbery occurring 7/9/99 and an armed car-jacking occurring 7/21/99.

12. PROGRAM NEEDS AND PARTICIPATION:

No Programs Recommended

13. PAROLE PLAN:

Where and with whom offender plans to live:

He has a home offer with his parents in Oklahoma City, Oklahoma.

(Note to Board: There are consecutive sentences totalling 40 years) LR

Type of job and expected earnings:

Details were not provided. "To be supplemented prior to hearing."

Plans to attend school and how school will be financed:

He plans to attend the University of Oklahoma, to study ancient history, and to finance his education with grants.

14. PERSONAL INFORMATION:

Single, 1 dependent, Education: Some College

Primary Job Skill:

He had part-time jobs as a teaching assistant, at a fast food restaurant, and at a grocery store.

Employment History:

His work record was steady, but he was unemployed when arrested.

Family history related to criminal behavior:

Denies Criminal Behavior is related to personal family history

Source for above information:

(Interview Questionnaire)

15. INVESTIGATOR RECOMMENDATION:

Next scheduled parole date: None

Option 1: Commute to Life Without Parole Potential Release Date: N/A Parole Date: N/A

Option 2: Commute to Life Potential Release Date: Life Parole Date: Immediate parole eligibility/next available docket

EXHIBIT B

OKLAHOMA PARDON AND PAROLE BOARD COMMUTATION APPLICATION AND INSTRUCTIONS

General Information on Commutation

A commutation consideration is not intended to serve as an early release mechanism but to correct an excessive or unjust sentence. An excessive or unjust sentence is considered in relation to the range of punishment for that crime, evidence that was not available to the court or jury at the time of trial, or a statutory change in the penalty for the crime that now makes the original penalty appear excessive. A commutation is a substitution of a lesser incarceration term for a greater one or a modification or reduction of a punishment. A commutation consideration is a rare and separate process from a parole or a pardon.

In Oklahoma, only the Governor can approve the commutation of a sentence after a favorable recommendation of the Pardon and Parole Board. The submission of an application does not imply or guarantee that the Pardon and Parole Board will favorably recommend a commutation and/or that the Governor will approve a commutation.

The Pardon and Parole Board utilizes a two-stage process for commutation consideration. The first stage is a Jacket Review. During the Jacket Review, the Pardon and Parole Board will review the application along with any other materials that are submitted with application to determine if the application has merit and should be passed to Stage Two.

If the application is passed to Stage Two, the inmate will have a personal appearance with the Pardon and Parole Board via video conferencing. If an inmate receives a misconduct prior to the hearing, the personal appearance will be cancelled, and the inmate will become ineligible for that commutation.

Any number of family and friends, often referred to as delegates, are allowed to attend the Stage Two Hearing; however, only two (2) persons can sit before the Pardon and Parole Board and only one (1) is allowed to speak. Delegates speaking on behalf of the inmate are limited to two (2) minutes. Delegates may also submit letters in support of the inmate's application to the Pardon and Parole Board for review. The support letters must be submitted with the application. Letters may be typed or handwritten on one-side only. Handwritten letters must be legible. Please do not use staples. Letters must include the inmate's name, DOC number, and docket month and year on top of the each page. The deadline to submit such documentation is the Tuesday before the hearing date.

Victims and/or victim's representatives, the judicial representative from the court of conviction, a Representative from the arresting law enforcement agency and the District Attorney are also allowed to speak in protest of the application.

After the personal appearance, the Pardon and Parole Board will vote to either recommend a commutation or deny the request. If a recommendation occurs, the commutation will be forwarded to the Governor. The Governor will make the final decision to approve or deny a commutation.

Eligibility

Applications can be submitted at any time. However, after an unfavorable recommendation by the Board or the Governor, an applicant may reapply: 1) upon recommendation from the Governor; 2) if there has been a statutory change in the penalty for the crime; or 3) three years from date of denial. Applications, which are deemed as ineligible, will not be processed and the applicant will be notified.

Completing the Application

The applicant should take the following steps in completing the application.

1. Type or print the answers in ink.
2. If the application is illegible, it will be returned and will not be processed.
3. It is the applicant's responsibility to submit a completed application. Every number and blank must have a response. If the answers to a question are incomplete, unclear, or non-responsive, you will be notified. The application will not be processed until it is complete. Each question must be answered fully, truthfully, and accurately.
4. **If the space provided for any answer is insufficient, the answer must be completed on the Optional Continuation Page that is provided. List the question number and include with the application. The applicant must list only one question on each continuation page.**
5. Altered or retyped forms will be returned.
6. Application forms must be filled out completely, signed, dated, and notarized where required.
7. The submission of any false information is grounds for immediate denial of the application.
8. In completing the application, using "See Attached" on a question is considered non-responsive, unless using the Continuation Page Form. Applicants are expected to complete the question as indicated and include additional information using the Optional Continuation page.
9. Do not include the instructions with the application (pages 1-3).
10. Do not staple or bind the application in any way.

APPLICANTS SHOULD KEEP A COPY OF THE COMPLETE APPLICATION!

Submitting the Application

Send the completed application to: Oklahoma Pardon and Parole Board, Attn: Commutation, 2915 N. Classen Blvd., Suite 405, Oklahoma City, Oklahoma, 73106

Timeline

Once a completed application is submitted and processed, the commutation will be placed on the next available docket of the Pardon and Parole Board.

For More Information

For more information, contact the Pardon and Parole Board at 405/521-6600.

**OKLAHOMA PARDON AND PAROLE BOARD
COMMUTATION APPLICATION**

Instructions:

Type or print the answers in ink. **Do not leave items or sections blank.** It is the applicant's responsibility to submit a complete application. If the space provided for any answer is insufficient, answers must be completed on the Optional Continuation Page, list the question number, and include with Optional Continuation Page with the application. Only one question for each Optional Continuation Page is allowed.

GENERAL INFORMATION

Name: Julius Darius Jones
 First Middle Last Suffix (i.e. Junior)

Facility: Oklahoma State Penitentiary, McAlester

Facility Address: 1301 N. West St.

City: McAlester State: OK Zip: 74501

Date of Birth: 07/25/1980 Place of Birth: Oklahoma City, OK

Gender: Male Female DOC #: 270147

Did someone else help you prepare the application? Yes No

Name: Dale A. Baich and Amanda C. Bass

Address: 850 W. Adams St., Ste 201

City: Phoenix State: AZ Zip: 85007

Area Code/Telephone Number: 602-382-2816

Is the person assisting in the preparation of the application an attorney? Yes No

If yes, OK Bar #: Amanda Bass AL Bar No. 1008H16R, Dale Baich OH Bar No. 0225070

If no, what is the relationship between the applicant and the person assisting in the preparation?

1. Are you a United States citizen? **Yes** **No**
2. Have you ever applied for a Commutation before? **Yes** **No**

If yes, list the month(s) and year(s) of every application for which you have previously applied?
Start with the first application and end with the most recent application.

Month	Year

OVERVIEW OF OFFENSES FOR COMMUTATION CONSIDERATION

3. List the case number(s), offense(s) or the crime(s) committed) the county, and the sentence length for every Oklahoma conviction, for which a commutation is being requested. If a case is a consecutive sentence (CS) or concurrent sentence (CC), list in the sentence length. The subsequent section entitled, *Detail of Offenses for Commutation Consideration*, will request more detailed information. *If additional space is needed, list the question number on the Optional Continuation Page.*

CASE NUMBER, INCLUDING COUNTS	OFFENSE (Crime Committed as named on the Judgement and Sentence)	COUNTY	SENTENCE LENGTH (Including CS and CCs)
CF-99-4373 Count 1	Murder in the First Degree	Oklahoma	Death
CF-99-4373 Count 1	Possession of a Firearm	Oklahoma	15 yrs CS to Ct 1
CF-99-4373 Count 1	Conspiracy to Commit a Felony	Oklahoma	25 Yrs CS to Ct 2

4. Were there victims in your crimes? Yes No
- A. If yes, how many? one
- B. Did you know the victim(s)? Yes No
- C. If yes, what was the relationship? _____

- D. Were the victim(s) injured? Yes No
- E. Age(s) of the victim(s)? 45 years old
- F. Were other persons involved in the crimes listed above? Yes No
- G. If yes, list the name(s) of your accomplice(s) and what, if any sentences they received.

NAME OF ACCOMPLICES	SENTENCE OF ACCOMPLICES
Christopher Jordan	Life with all but first 30 years suspended; served 15 years

5. Do you have a detainer(s)? Yes No
6. If yes, list the authority (ICE, County, City, State, etc.): _____

ACCOUNT OF THE OFFENSE

7. For each criminal case and the count(s) for which you are seeking a commutation as listed in Question 4, describe in detail your involvement in the crime, who else was involved, and what were your actions before, during, and after the crime. Be specific and describe your exact responsibility. If you are seeking a commutation for more than one criminal case, list the case number and describe each separately. *If more space is needed, use the Optional Continuation Page and list the question number.*

Admittedly, I have done some stupid things in my life and I am ashamed, embarrassed and repentant of my youthful actions. But, as God is my witness, I was not involved in any way in the crimes that led to Paul Howell being shot and killed on July 28, 1999. I have spent the past twenty years on death row for a crime I did not commit, did not witness, and was not at. I feel terrible for Mr. Howell and his family, but I was not responsible. I did not have a chance to tell

Question 7. Account of the Offense (continued)

my story to the jury at my trial because my lawyers rested the case without calling any witnesses, including my mother, father, sister and brother who would have told the jury I was home with them when this crime was committed.

Today, I deeply regret my youthful involvement with the people responsible for Mr. Howell's death and I wish I had just gone and spoken to the police when I heard they were looking for me. If I did that, I don't think I would be where I am now. While I wish that I'd gone to the police with what I knew, I was scared to get involved. I was, like other young black men in my neighborhood, afraid of the police, and I didn't trust them. [1] [My lawyers will be providing you with the documents corresponding to the numbers listed in my answer.] I regret not coming forward with what I learned after Mr. Howell's murder and that my silence meant that those actually responsible for his death are now walking free. I want to take this chance to tell what I know about what happened.

In the summer between my freshman and sophomore years of college at Oklahoma University, I spent time away from my apartment near campus in Norman and back home with my parents and siblings in Oklahoma City. Chris Jordan was a person I had played on the basketball team with at John Marshall High School, and we reconnected earlier in the year of 1999 after bumping into one another at a basketball game.

On July 28, 1999, Chris and his girlfriend came to my parents' house in the morning in his girlfriend's red Geo Prism. Chris had a 1972 Cutlass that had broken down, and I was going to go with him that morning to AutoZone to help get the battery recharged. Around lunchtime, Chris drove me to see my girlfriend at the accounting firm she worked at. I saw her for about 20 minutes and then Chris drove me to Chevy's Garage to pick up my car which was in the shop for a transmission repair. The mechanic needed parts to repair the transmission so I took the car back. On the way home, the transmission was leaking fluid and smoking. We ran into Ladell King, who was a friend of Chris's and who I had met through Chris a few weeks earlier, and he flagged me down. Ladell lived close by and said I could park my car outside his apartment until I could figure out how to get the car back to the shop. That was around 4:00 p.m.

Chris dropped me off at my parents' house around 4:30 p.m. We were planning to go to

OPTIONAL CONTINUATION PAGE

*The applicant must list the question number for each response that uses an Optional Continuation Page. Use a separate **continuation page** for each question. Do not use one page for multiple questions. Use as many Optional Continuation Pages as needed.*

For Question # 7-1

my apartment in Norman so I could get some clean clothes and he was going to pick me up later in the day. Chris didn't come back to pick me up until much later that night. I remember being mad at him because he was supposed to come get me much earlier.

While I was waiting for Chris, I played games with my sister and brother and around 8:00 p.m. my mother, father, sister, brother and I had a spaghetti dinner. The dinner sticks out in my mind because it was close to my birthday and one of my friends had given me a large birthday cookie. Sometime after dinner I went to get the cookie but there was only one piece left because my brother and sister had been eating it behind my back. Between 9:30 and 10 p.m., my mother drove my brother to work. I was at home when she left and home when she returned. I told her about my birthday cookie being gone when she returned.

Between 11 and 11:30 p.m. that evening, Chris finally picked me up and we drove to my apartment in Norman. Chris and I had words because he was so late. Chris seemed a bit off and told me he got into it with some guys and shot at them. I was shocked, but didn't ask any questions. My thought at the time was the less I knew the better.

After picking up some clean clothes back at my apartment, Chris and I left Norman at around 2:00 a.m. and headed back to Oklahoma City. We hung out at the apartment of Chris' brother, Laymon Jordan, between 2:30 and 3:00 a.m. We talked, drank, played dominos and, at some point, I fell asleep.

Early the next day Chris drove me to pick up my car. Chris followed me to Championship Auto where I dropped off the car to get the transmission repaired. Chris then dropped me off at my parents' house around 8:30 a.m. and I went to sleep.

Sometime during the day, Ladell started paging me looking for Chris. I told Ladell I didn't know where Chris was, and he asked me to help move a car with him since he could not reach Chris. Ladell said he would give me something (which I understood to be money) if I helped him. I needed money so I agreed and Ladell picked me up around the corner from my parents' house in a red Firebird. Ladell kept asking me if I knew where Chris was.

When we got to Ladell's apartment, he asked me to follow him in a Suburban that was parked there. That made me suspicious and I refused because I was pretty sure the Suburban was stolen based on stories I'd heard from Ladell about how he would steal cars and change serial numbers.

OPTIONAL CONTINUATION PAGE

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For Question # 7-2

Ladell instead drove the Suburban and I followed him in his car. Ladell parked the Suburban at a grocery store and went inside. After a minute, I went into the store. I don't remember if Ladell bought anything. We left the store and drove together in his Firebird to an auto shop. I later learned (after I was arrested) that the auto shop was a chop-shop run by a man named Kermit Lottie. Ladell went into the garage while I waited in the car.

Ladell returned 10 or 15 minutes later and looked spooked. We drove in silence back to the grocery store where the Suburban was parked and Ladell just sat parked behind it for several moments as if thinking. Ladell said the garage didn't want the Suburban because there was "a body on the truck," or something like that. I didn't know what he was talking about, but I had a bad feeling and should have bolted and gone to the police, but I didn't.

Ladell seemed obsessed with finding Chris so I suggested he (Ladell) look for him at the Macklanburg Recreational Center where we played ball. We saw Chris's Cutlass parked outside and Ladell walked in. I walked into the gym after Ladell and could see him and Chris having what looked like a serious discussion.

Ladell left the gym in his car and Chris drove me back to my parents' house. Chris insisted on turning on the news. It was then that I learned that someone had been killed the night before in a robbery of a Suburban. Chris left, but left his car at my parents' house. I think at that point things were starting to add up to me that Ladell and Chris were involved. I should have gone to the police but I didn't. That was stupid and I regret it, but I was becoming concerned for my and my family's safety.

After midnight on Friday Chris called and asked me to pick him up at a laundromat because he was locked out of his grandmother's house. He was insistent. Because he had left his car at my parents' house, I took his car to pick him up and we drove back to my parents' house. I went to the living room couch to watch TV and called some girls on the family phone, and fell asleep. Chris said he needed to make calls and went upstairs to use the other phone line in my bedroom upstairs. (Looking back, I'm sure that's when Chris hid the gun and bandana that the police later found in that room.) By the time I woke up later Friday morning Chris was gone. After cutting the grass, I was on the phone with a friend and received a call on the other line from Ladell. (I later learned he was in police custody and calling me from outside my house.) The call was short. Ladell asked what I was doing and I told him I was talking to a girl.

A second call came in and the person on the other end asked if I was home. I knew something

OPTIONAL CONTINUATION PAGE

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For Question # 7-3

wasn't right and figured it had to do with Chris. I knew he was up to no good, but didn't want to be in the middle of it. So I said Julius wasn't there and hung up.

I left to find out what was going on. I didn't sneak out or jump out a window. I left from the door in the back of the house that we always used to come in and go out. I noticed several police vehicles on my block. On the next block, I ran into Chris who was walking towards my house and he said we should drive to Ladell's apartment to find out what was going on. Ladell's girlfriend told us that the police had Ladell. Chris told her not to worry about it and that he was going to talk to the police.

When we got back in the car, Chris asked me to go tell his brother Laymon the police were looking for "us." I understood that to mean Chris and his brother, not Chris and me. Chris got out of the car near Macklenburg. I thought he was going to talk to the police like he said. I agreed to go tell Chris' brother what was going on.

I was arrested early Saturday morning at Laymon's apartment because I was afraid to go back to my house. I was in shock when I was arrested, handcuffed, and dragged to a police car. The officers were high fiving one another and told me: "You know you're gonna fry." While being transferred from an Oklahoma City police car to an Edmond police car, an officer removed my handcuffs and said, "Run nigger. I dare you, run." I stood frozen, knowing that if I moved I could be shot and killed.

I feel horribly for Mr. Howell and his family. I should never have helped Ladell move the Suburban and would not have done so if I knew what truly had happened. I wish I had talked to the police. I have been haunted by those terrible decisions every day for the past twenty years. I know Ladell and Chris framed me to save themselves, but I absolutely did not commit this crime and I was wrongfully convicted.

REASON(S) FOR SEEKING A COMMUTATION

8. A Court sentenced you for a crime or crimes that you committed. Please select why you are now seeking to reduce your sentence through a commutation:

Select One or More:

- 1) Given the range of punishment for the crime, this penalty is now excessive.
 2) There are facts which were not available to the court or jury at the time of the trial.
 3) There is a statutory change in penalty for the crime which makes the original penalty appear excessive.

For each item checked above, provide, in detail why you believe that Item 1, 2, or 3 applies to you. If more space is needed, use the Optional Continuation Page and list the question number.

I'm asking that my life be spared and my sentence be commuted to time served for several reasons.

I am innocent.

I did not commit the crime that I was convicted of. As I explained in answering question 7, at the time Mr. Howell was shot, I was at my parents' house, with my family, miles away. I did not commit, did not witness, was not at, and had nothing to do with Mr. Howell's murder. Despite that, my overworked, underpaid, and inexperienced trial lawyers failed to adequately investigate my alibi, failed to present helpful evidence, and didn't call a single member of my family to testify that I was at home with them on the night of the crime. In fact, my lawyers simply rested after the state finished its case without presenting any evidence or calling a single witness, including me. At the very last minute, they advised me to not testify. Until that time, I had every intention of testifying and understood the importance of my testimony to my innocence defense.

In addition, my lawyers didn't offer evidence demonstrating that I could not have been the shooter. At trial, the only eyewitness identified the shooter as having half an inch of hair sticking out from underneath a stocking cap. [2] [3] That could not have been me. A photo of me taken just days before the crime on July 19, 1999 (which was never shown to the jury) shows that I had short, closely cropped hair not long enough to match the eyewitness's description of the shooter. [4] [5] Chris Jordan, on the other hand who blamed me for the shooting and worked out a deal with prosecutors to testify against me, fit the description. A photo of Chris at the time of the crime

OPTIONAL CONTINUATION PAGE

The applicant must list the question number for each response that uses an Optional Continuation Page. Use a separate continuation page for each question. Do not use one page for multiple questions. Use as many Optional Continuation Pages as needed.

For Question # 8-1

shows that he had long hair which would have stuck out from beneath a stocking cap. [4] The jury was never shown that I couldn't have been the person identified by the eyewitness to the crime.

Kermit Lottie and Ladell King lied to protect themselves.

Kermit Lottie and Ladell King testified against me. Both of them had reasons to lie. Kermit operated a chop-shop a few blocks from where police found Mr. Howell's Suburban. He testified that Ladell approached him on July 29, 1999 about selling him a vehicle that matched the description of the one stolen during the shooting that resulted in Mr. Howell's death. [4] Kermit was a convicted felon [4] and a longtime informant for the Oklahoma City Police. [6] At the time Mr. Howell was killed, Kermit was facing federal drug distribution charges. On August 17, 2000, prior to my trial, Kermit signed a plea agreement and was facing up to 40 years in prison. But because Kermit testified for the State, he only received a 7 year sentence on his federal charges. [7] The lead detective on Mr. Howell's case wrote to the U.S. Attorney prosecuting Kermit stating, "If Kermit had not cooperated with my investigation I believe the homicide would be unsolved to this day." [8]

Ladell also benefitted from his testimony against me. Ladell was also a convicted felon and self-described "car thug" who admitted to stealing cars and selling them to Kermit. [3] [4] Ladell was never prosecuted in connection with Mr. Howell's death even though he admitted to being involved. Ladell was also facing bogus check charges at the time. As a habitual offender, he was facing twenty years' imprisonment on those charges, but was sentenced to ten years of probation, and no jail time. [9] [10]

The State hid its deal with Chris Jordan.

Chris pled guilty to first-degree murder and conspiracy to commit a felony in connection with Mr. Howell's murder in exchange for testifying against me on behalf of the prosecution. [11] [12] [13] At my trial, Chris lied and testified that I murdered Mr. Howell. [11] On paper, Chris's plea required him to serve a minimum of 30 years in prison before becoming eligible for parole. The prosecutor even told the jury that Chris would serve 30 years on a life sentence with the remainder suspended. [2] [13] But that was false. What I didn't know at the time he testified against me was that Chris already had a secret deal with the prosecution to serve far less than 30 years in prison in exchange for pointing the finger at me.

Before my trial, Chris and the prosecutors in my case agreed that he would only serve 12 to 15 years in prison in exchange for his testimony against me. That deal was never disclosed to me or the jury. [14] [15] Chris was released from prison in December 2014 after serving only 15 years of

OPTIONAL CONTINUATION PAGE

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For Question # 8-2

his life sentence. [16]

Chris Jordan admitted that he set me up.

Prior to my trial, Chris admitted to two people that I wasn't involved in the murder. In late August or early September 1999, Chris told a man named Manuel Littlejohn that "Julius didn't do it" and "Julius wasn't there." Chris admitted to Manuel that he tried to frame me by wrapping the gun used to commit the crime in a bandana and hiding it in my house. Chris also told Manuel about his secret side deal with prosecutors, telling him "I'm going to do fifteen years and go home." That's exactly what happened. Even though I told my lawyer about Chris's confession, he never asked Chris about it and he never called Manuel to testify at my trial. [15]

Christopher Berry is another man who also heard Chris bragging about framing me. Berry said that while he was in the Oklahoma County Jail in the early 2000s he overheard Chris bragging to another prisoner that he was the actual person who shot the victim, and that because he was the first person to talk to the police he was getting a deal and would not get the death penalty. [17] Berry had the same lawyer as me (David McKenzie), but Mr. McKenzie never called Berry to testify at my trial about what he heard Chris say. It was not until postconviction that I learned what Berry would say.

Racism in my case.

Even before charges were filed against me, the District Attorney, Bob Macy, told the media that I deserved to die because the crime that I had allegedly committed happened "in what should be a safe neighborhood" and "happened for the worst of reasons, to get money to go buy drugs." [18] There was no evidence then or now that Mr. Howell's murder involved drugs. Mr. Macy's appeal to racial stereotypes worked. An editorial in The Daily Oklahoman shortly after Mr. Macy made his remarks said that "[t]o his credit, District Attorney Bob Macy has already decided to seek the death penalty, which this crime certainly deserves." [19]

During my trial, prosecutors took every opportunity to racialize me by appealing to the deeply entrenched and stereotypical association between blackness and dangerousness. [20] ("[P]resented with a criminal defendant, even well-meaning people fall prey to the stereotype that, whether for reason of biology or culture, Black people are inherently violent and dangerous."). In urging jurors to sentence me to death, prosecutors argued that I was a "continuing threat" because I was "out prowling the streets" engaging in criminality. But that wasn't true. At the time of my trial I had no prior violent felony convictions. I had gotten into some trouble previously, but none of it was violent. The prosecutor's language reflected and reinforced "the monstrous specter that is never far from the

OPTIONAL CONTINUATION PAGE

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For Question # 8-3

surface: the violent Black brute, the single most fearful, dehumanizing, and cruel stereotype that Black people have had to endure.” [20] The strategy worked.

On November 2, 2017, one of the jurors on my case, Victoria Armstrong, [21] [22], told my legal team that another juror by the name of Jerry Brown said during my trial that, “[t]hey should put [me] in a box in the ground after this is all over for what he’s done.” [23] Ms. Armstrong explained that during the trial she “went to the judge with the comment from another juror about how it was a waste of time and ‘they should just take the nigger out and shoot him behind the jail.’” [22] According to Ms. Armstrong, “that juror was never removed and nothing further came from it.” [22] No one selected to serve on my jury ever told the judge that they couldn’t be fair and impartial, but Ms. Armstrong’s account demonstrates that I was not tried and sentenced by an impartial jury of my peers. I was tried by a jury that included at least one racist and I never had a chance. Despite my lawyers’ efforts to have a court review this evidence, no court has ever considered how this issue made my trial and my death sentence unfair. There are procedural technicalities that stopped the courts from looking at the merits of this claim.

In April 2017, after studying all homicides that occurred in Oklahoma between January 1, 1990 through December 31, 2012, the Oklahoma Death Penalty Review Commission issued a report concluding that someone like me who is accused of killing a white male victim in Oklahoma is nearly three times more likely to receive a death sentence than if the victim were a nonwhite male. [24] I’m facing execution without any court having ever addressed this issue either. Again, because of procedural technicalities, courts have avoided review of this issue.

The District Attorney has refused to share its file with my lawyers

Why did Chris only serve 15 years in prison even though he was supposed to serve at least 30 years under his plea agreement? Why did prosecutors tell my jury that Chris was going to serve 30 years in prison for what he’d done, when they knew that he’d been promised that he’d get out in half that time? Why did Kermit and Ladell also get great plea deals that the prosecutors in my case never fully or timely disclosed to my lawyers or my jury? The answers to these questions may be in the District Attorney’s files.

My lawyers have, for several years now, asked Oklahoma City District Attorney David Prater to allow them to review the prosecution’s file on my case. Although Mr. Prater finally agreed, in the fall of 2018, to allow my lawyers to review the State’s file, he ultimately reneged on that promise. [25] Can you ask the District Attorney to make his file available to my lawyers and to the public?

OPTIONAL CONTINUATION PAGE

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For Question # 8-4

DNA testing raises serious questions about the prosecution's theory of the crime

Chris admitted spending the night at my parents' house after the crime where, as I said before, I believe he wrapped the gun used to murder Mr. Howell in a bandana and planting it in my bedroom. At trial, the eyewitness to Mr. Howell's murder reported that the shooter was wearing a red bandana over his face and mouth during the crime. DNA testing conducted last year determined that no saliva was detected on the red bandana that police found in my parents' house. That testing undermines the prosecution's claim that that bandana was worn over someone's mouth and, therefore, is the bandana used during the crime.

That testing also revealed the presence of DNA belonging to three or more people on the bandana. But because the police failed to test this evidence years ago, and because so many years have gone by, the DNA was severely degraded and the testing can't tell us who these 3 or more other people are. And even though part of one of those profiles is similar to mine, an expert has said that this could have resulted from transfer, including from police officers' handling of things in my bedroom for hours before they located the red bandana. [26]

Conclusion

Why didn't the police conduct DNA testing years ago? Why didn't they search Chris's and Ladell's homes in the aftermath of the crime? And what might they have found had they done so? Why didn't the police thoroughly investigate obvious suspects in this case (Chris, Ladell, Kermit, and maybe others), instead of secretly giving them sweet deals to point the finger at me? Tunnel vision set in. Why was a racist juror who prejudged my guilt allowed to convict and sentence me to die? I'm facing execution even though I didn't kill Mr. Howell and the answers to these questions are still unanswered. For all these reasons, I'm asking that the Board and Governor Stitt spare my life and commute my sentence to time served.

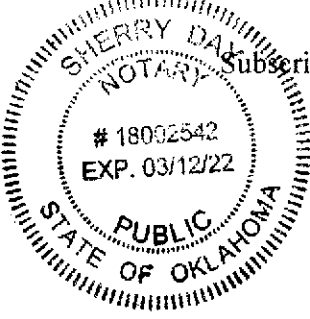
CERTIFICATION AND PERSONAL OATH

I certify that all answers to the above questions and all statements contained herein are true and correct to the best of my knowledge and information. I understand that any intentional misstatement of material facts contained in this application may cause adverse action on my application for a commutation.

I understand that there is no appeal process upon denial of an application for commutation.

I have read and understand the Commutation applications instructions. By signing and submitting this application, I understand and voluntarily accept the terms of the commutation if it is approved. In making application for a commutation from the Governor of the State of Oklahoma, I do solemnly swear that I will be a law-abiding citizen and that I take this obligation freely and without any mental reservation whatsoever.

Name of Applicant: MR JULIUS D. JONES
Signature of Applicant: *[Handwritten Signature]*
Date: 10-10-2019
(Month, Day, Year)

NOTARY	
	Subscribed and sworn before me this <u>10th</u> day of <u>Oct</u> , <u>2019</u> . (Day) (Month) (Year)
	<u><i>Sherry Day</i></u> Notary Public
	My commission expires: <u>3-12-22</u> My commission number is: <u>18002542</u>

RELEASE OF INFORMATION TO THE PARDON AND PAROLE BOARD

Carefully read this authorization to release information, then complete and sign in ink (blue or black).

I authorize any representative of the Oklahoma Pardon and Parole Board and/or the Oklahoma Department of Corrections, to obtain any information relating to my activities from schools, residential management agents, employers, criminal justice agencies, retail business establishments, courts, or other sources of information. This information may include, but is not limited to, my academic, residential, achievement, performance, attendance, disciplinary, employment history, criminal history, arrest, conviction, including the pre-sentence investigation report, if any, medical, psychiatric/psychological, health care, financial, and credit information.

I understand that, for financial or lending institutions and certain other sources of information, a separate specific release may be needed (pursuant to their request or as may be required by law), and I may be contacted for such a release at a later date.

I further authorize the Oklahoma Pardon and Parole Board and/or the Oklahoma Department of Corrections, or any other authorized state agency, to request criminal record information about me from criminal justice agencies for the purpose of determining my suitability for a commutation.

I authorize custodians of records and sources of information pertaining to me to release such information upon request of any representative of the Oklahoma Pardon and Parole Board and/or the Oklahoma Department of Corrections or any state agency authorized above regardless of any previous agreement to the contrary. I understand that the information released by records custodians and sources of information is for official use by the State of Oklahoma only for the purposes of processing my application for a commutation, and may be re-disclosed by the State of Oklahoma only as authorized by law.

Copies of this authorization that show my signature are as valid as the original release signed by me. This authorization is valid for one (1) year from the date signed.

MR JULIUS S. JONES
Full name (Typed or Printed)

J.S.J. Jones
Signature of Applicant

10-10-2019
Date Signed

**RELEASE OF INFORMATION TO ATTORNEY
OR OTHER AUTHORIZED PERSON**

I authorize the Pardon and Parole Board to release information, including but not limited to the investigative report and all contents therein without redaction. I understand this may include information relating to behavioral or mental health services, treatment for alcohol and drug abuse, and/or other protected health information.

This information may be released to:

Name or Title of Person or Organization: Dale A. Baich
Address: 850 West Adams Street, Suite 201
City, State and Zip: Phoenix, Arizona 85007
Area Code/Phone: 602-382-2816 Area Code/Fax: 602-382-2801
Email: dale_baich@fd.org

The relationship to the individual listed above Attorney

This information is being released for the following purpose:
no limitation

I understand that I can revoke this Authorization at any time, except to the extent that action has been taken in reliance on it, by providing written notice to the Oklahoma Pardon and Parole Board. In any event, this Authorization expires in one (1) year from the date of signing or upon the condition(s) described above.

I understand that my records are currently protected by Oklahoma State statutes including Title 63, O.S. Section 1-502.2, and federal privacy regulations including the Health Insurance Portability and Accountability Act (HIPPA), 45 C.F.R. Parts 160 and 164. I understand that my health information specified above will be disclosed pursuant to this authorization, and that the recipient of the information may redisclose the information and it may no longer be protected by the HIPPA privacy law. When applicable, the federal regulations governing the confidentiality of Alcohol and Drug Abuse Patient Records, 42 C.F.R. Part 2, prohibits redisclosure of such information without my specific written consent or when permitted by regulations.

This Authorization is made freely and I voluntarily give this consent. You are hereby authorized to treat copies of this Authorization the same as originals thereof.

Mr. Dennis J. Jones
Full name (Typed or Printed)
Dennis J. Jones
Signature of Applicant
10.10.2019
Date Signed

EXHIBIT C

Office of the
FEDERAL PUBLIC DEFENDER
for the District of Arizona
Capital Habeas Unit

Jon M. Sands
Federal Public Defender

direct line: (602) 382-2816
email: dale_baich@fd.org

March 5, 2021

Tom Bates, Executive Director
Oklahoma Pardon and Parole Board
2915 N. Classen Blvd., Ste 405
Oklahoma City, Oklahoma 73106-5436

Re: Julius Jones, #270147 Pending Commutation Application

Dear Mr. Bates:

Enclosed is the Second Supplement to accompany the Commutation Application for Julius Darius Jones. His case is listed on the March 2021 Stage 1 Commutation Docket (Dkt. 213).

Exhibit 33 is an Affidavit by Roderick Wesley. Mr. Wesley is the third person to swear under oath that Christopher Jordan, the co-defendant in Mr. Jones case, confessed to killing Paul Howell. This affidavit further supports the response to Question 8 in Mr. Jones' Commutation Application, specifically the sections titled "I am innocent," "The State hid its deal with Chris Jordan," "Chris Jordan admitted that he set me up," and "The District Attorney has refused to share its file with my lawyers."

Mr. Wesley attests that:

"One day while we were at work at the Commissary store, I was telling Jordan about the crimes I was convicted of committing, and Jordan spilled his guts and told me about his crime. Jordan said to me, "my co-defendant is on death row behind a murder I committed." . . . [He] only said he killed a man" . . . When Jordan was telling me this, he was acting

Tom Bates, Executive Director

March 5, 2021

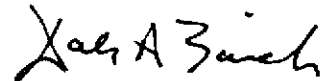
Page 2

like he was sorry for what he had done, but he said that he was not going to jump out there and give himself up to the wolves.”

Exhibit 34 is an Affidavit by Rebecca Postyeni, an investigator, who verified that Mr. Wesley and Mr. Jordan were housed together and worked together at the time Mr. Jordan confessed to Mr. Wesley.

Please forward the Second Supplement to Members of the Pardon and Parole Board so it may be reviewed prior to Stage 1 consideration.

Sincerely,

A handwritten signature in black ink that reads "Dale A. Baich". The signature is written in a cursive style with a prominent "D" and "A".

Dale A. Baich
Amanda C. Bass
Counsel for Julius Jones

cc: Julius Jones
DAB/ddj

EXHIBIT D



State of Oklahoma
PARDON AND PAROLE BOARD

PAROLE INTERVIEW QUESTIONNAIRE

Julius Darius Jones

(Name of Inmate)

270147

(DOC Number)

You will be considered for parole on the June 2021 Stage II docket. You will need to complete this questionnaire and return it to the Parole Investigator either through your case manager, unit supervisor, facility mail, or the parole investigator's mailbox. For your information to be included in the report to the board, return no later than April 30, 2021.

- If you do not wish to be considered for parole, notify your case manager or a member of your unit team about signing a "Waiver of Parole" form, and return it to the Parole Investigator immediately.
- If you are scheduled for a personal appearance but wish to waive the personal appearance, inform your case manager or a member of your unit team and you will be provided with a form to sign requesting a jacket review only.
- If you meet certain criteria, your docket type may be changed to Re-Entry or SIR (Serious Incident Report). All offenders on these types of dockets will have a jacket review only. Individuals on the SIR docket may only have delegates appear on their behalf at Stage II.
- If you are passed to stage II, the personal appearance will occur approximately two months after the jacket review.
- If you have delegates that wish to attend the meeting on your behalf, they must contact the Pardon and Parole Board administrative office at (405) 521-6600 at least ten (10) days prior to the meeting to obtain a confirmation number. A confirmation number is required to attend. If you or your delegates wish to correspond with the Pardon and Parole Board members, you can do so at:

*Oklahoma Pardon and Parole Board
2915 N. Classen Blvd., Suite 405
Oklahoma City, OK 73106-5436*

- Individuals with current violent offenses (including CC cases) will have a two-stage consideration process. Delegates can appear at the second stage ONLY.

If you still have questions regarding parole or this questionnaire, fill out an Offender Request for the Parole Investigator and it will be returned to you as soon as time allows.

Thank you for your cooperation.

PAROLE INTERVIEW QUESTIONNAIRE

Julius Darius Jones
(Name of Inmate)

270147
(DOC Number)

Version of Offense(s)

Tell your version of the controlling case and CC cases (if any) and all actively running cases. Include the case numbers if you have more than one active case. Do not only write down the name of your conviction; tell the story of what happened from your point of view. In your version please include the following:

- What led to your arrest?
• How did the police become involved?
• What type of weapon(s) were involved, if any?
• For drug offenses, what substance(s) was/were involved, the quantity involved, and how much money was present if it was a drug transaction offense?
• What was the outcome of the case? (for example: plea agreement, jury trial, etc.)

If you need more room, use the back of this form or attach a sheet.

In the summer between my freshman and sophomore years of college at Oklahoma University, I spent time away from my apartment near campus in Norman and back home with my parents and siblings in Oklahoma City. Chris Jordan was a person I played on the basketball team with at John Marshall High School, and we reconnected earlier in the year of 1999 after bumping into one another at a basketball game.

On July 28, 1999, Chris and his girlfriend came to my parents' house in the morning in his girlfriend's red Geo Prism. Chris had a 1972 Cutlass that had broken down, and I was going to go with him that morning to AutoZone to help get the battery recharged. Around lunchtime, Chris drove me to see my girlfriend at the accounting firm she worked at. I saw her for about 20 minutes and then Chris drove me to Chevy's Garage to pick up my car which was in the shop for a transmission repair. The mechanic needed parts to repair the transmission, so I took the car back. On the way home, the transmission was leaking fluid and smoking. We ran into Ladell King, who was a friend of Chris's and who I had met through Chris a few weeks earlier, and he flagged me down. Ladell lived closed by and said I could park my car outside his apartment until I could figure out how to get the car back to the shop. That was around 4:00 p.m.

Chris dropped my off at my parents' house around 4:30 p.m. We were planning to go to my apartment in Norman so I could get some clean clothes and he was going to pick me up later in the day. Chris didn't come back to pick me up until much later that night. I remember being mad at his because he was supposed to come get me much earlier.

While I was waiting for Chris, I played games with my sister and bother and around 8:00 p.m. my mother, father, sister, brother and I had a spaghetti dinner. The dinner sticks out in my mind because it was close to my birthday and one of my friends had given me a large birthday cookie. Sometime after dinner I went to get the cookie but there was only one piece left because my brother and sister had been eating it behind my back. Between 9:30 and 10 p.m., my mother drove my brother to work. I was home when she left and home when she returned. I told her about my birthday cookie being gone when she returned.

[See attached for continuation.]

If you decline to discuss your offenses, check here: _____

Between 11 and 11:30 p.m. that evening, Chris finally picked me up and we drove to my apartment in Norman. Chris and I had words because he was so late. Chris seemed a bit off and told me he got into it with some guys and shot at them. I was shocked but didn't ask any questions. My thought at the time was the less I knew the better.

After picking up clean clothes back at my apartment, Chris and I left Norman around 2:00 a.m. and head back to Oklahoma City. We hung out at the apartment of Chris' brother, Laymon Jordan, between 2:30 and 3:00 a.m. We talked, drank, played dominos and, at some point, I fell asleep.

Early the next day Chris drove me to pick up my car. Chris followed me to Championship Auto where I dropped off the car to get the transmission repaired. Chris then dropped me off at my parents' house around 8:30 a.m. and I went to sleep.

Sometime during the day, Ladell started page me looking for Chris. I told Ladell I didn't know where Chris was, and he asked me to help move a car with him since he could not reach Chris. Ladell said he would give me something (which I understood to be money) if I helped him. I needed money so I agreed and Ladell picked me up around the corner from my parents' house in a red Firebird. Ladell kept asking me if I knew where Chris was.

When we got to Ladell's apartment, he asked me to follow him in a Suburban that was parked there. That made me suspicious and I refused because I was pretty sure the Suburban was stolen based on stories I'd heard from Ladell about how he would steal cars and change serial numbers.

Ladell instead drove the Suburban and I followed him in his car. Ladell parked the Suburban at the grocery store and went inside. After a minute, I went into the store. I don't remember if Ladell bought anything. We left the store and drove together in his Firebird to the auto shop. I later learned (after I was arrested) that the auto shop was a chop-shop run by a man named Kermit Lottie. Ladell went into the garage while I waited in the car.

Ladell returned 10 or 15 minutes later and looked spooked. We drove in silence back to the grocery store where the Suburban was parked and Ladell sat parked behind it for several moments as if thinking. Ladell said the garage didn't want the Suburban because there was "a body on the truck," or something like that. I didn't know what he was talking about, but I had a bad feeling and should have bolted and gone to the police, but I didn't.

Ladell seemed obsessed with finding Chris so I suggested he (Ladell) look for him at the Macklanburg Recreational Center where we played ball. We saw Chris's Cutlass parked outside and Ladell walked in. I walked into the gym after Ladell and could see him and Chris having what looked like a serious discussion.

Ladell left the gym in his car and Chris drove me back to my parents' house. Chris insisted on turning on the news. It was then that I learned that someone had been killed the night before in a robbery of a Suburban. Chris left, but left his car at my parents' house. I think at that point things were starting to add up to me that Ladell and Chris were involved. I should have gone to the police, but I didn't. That was stupid and I regret it, but I was becoming concerned for my and my family's safety.

After midnight on Friday Chris called and asked me to pick him up at a laundromat because he was locked out of his grandmother's house. He was insistent. Because he had left his car at my parents' house, I took his car to pick him up and we drove back to my parents' house. I went to the living room couch to watch TV and called some girls on the family phone, then fell asleep. Chris said he needed to make calls and went upstairs to use the other phone line in my bedroom. (looking back, I'm sure that's when Chris hid the gun and bandana that the police later found in that room.) By the time I woke up later Friday morning Chris was gone. After cutting the grass, I was on the phone with a friend and received a call on the other line from Ladell. (I later learned he was in police custody and calling me from outside my house.) The call was short. Ladell asked what I was doing, and I told him I was talking to a girl.

A second call came in and the person on the other end asked if I was home. I knew something wasn't right and figured it had to do with Chris. I knew he was up to no good but didn't want to be in the middle of it, so I said Julius wasn't there and hung up.

I left to find out what was going on. I didn't sneak out of jump out of a window. I left from the door in the back of the house that we always used to come in and go out. I noticed several police vehicles on my

block. On the next block, I ran into Chris who was walking towards my house and said we should drive to Ladell's apartment to find out what was going on. Ladell's girlfriend told us that the police had Ladell Chris told her not to worry about it and that he was going to talk to the police.

When we got back in the car, Chris asked me to tell his brother Laymon the police were looking for "us." I understood that to mean Chris and his brother, not Chris and me. Chris got out of the car near Macklanburg. I thought he was going to talk to the police like he said. I agreed to tell Chris's brother what was going on.

I was arrested early Saturday morning at Laymon's apartment because I was afraid to go back to my house. I was in shock when I was arrested, handcuffed, and dragged to a police car. The officers were high fiving one another and told me: "You know you're gonna fry." While being transferred from an Oklahoma City police car to an Edmond police car, and officer removed my handcuffs and said, "Run nigger. I dare you, run." I stood frozen, knowing that if I moved, I could be shot and killed.

I feel horrible for Mr. Howell and his family. I should never have helped Ladell move the Suburban and would not have done so if I knew what truly had happened. I wish I had talked to the police. I have been haunted by those terrible decisions every day for the past twenty years. I know Ladell and Chris framed me to save themselves, but I absolutely did not commit this crime and I was wrongfully convicted.

I went to trial. I was found guilty and sentenced to death. My state and federal appeals have concluded. I am before this Board asking for my death sentence to be commuted to time served.

Substance Abuse History/Usage and Treatment History

List any substances that you have used in the past. Include the age of which you first used, and the age when usage stopped. Also, indicate the level of usage with the numbered scale provided. If you currently still use the substance, please indicate. Not leaving a stop age will look as though the substance is still being used.

1 – Seldom / 2 – Monthly / 3 – Weekly / 4 – Daily / 5 – Other (explain if this option is used)

Substance	Use? (Yes or No)	Frequency	Age (First Used)	Age (Stopped)
Alcohol	Yes	2	15	19
Marijuana	Yes	2	15	19
Cocaine	No			
Hallucinogens	No			
Amphetamine/Methamphetamine	No			
Barbiturates	No			
Opiates	No			
Other (specify):				

Have you ever received any substance abuse treatment in the community prior to incarceration? If yes, please provide treatment type (inpatient or outpatient), name of program or facility, location, length of involvement, also date treatment began and completed.

No

Mental Health History

Have you ever been diagnosed with or suffered from a mental illness? If so, please specify:

No

Have you ever received any mental health treatment in the community, prior to incarceration? If yes, please provide treatment type (inpatient or outpatient), name of program or facility, location, length of involvement, also date treatment began and completed.

No

Programs

List any programs completed during your most recent incarceration. Also, list those in which you are currently participating, with projected completion dates if known.

Programs are not available on death row.

Parole Plan (If you have a CS case or Detainer, indicate by writing N/A)

If you were to make parole, where would you live and with whom?

City Oklahoma City State Oklahoma

Relationship to the person with whom you will be living: Parents

Do you have a current job offer? (Circle One) Yes / No

If yes, give the name of the employer/company, location, type of work and expected wages/earnings:

To be supplemented prior to hearing.

Do you plan on attending college or a vocational/technical school after release? (Circle One) Yes / No
(If yes give the name of the school and field of study.)

Oklahoma University, Ancient History

How will you finance your education? (Circle all that apply)

Grants Loans Personal Funds Family Assistance

Other (please specify)

Personal Information

Place an "X" by the highest education that you have COMPLETED.

- Middle School (Specify Grade) _____
- High School (Specify Grade) _____
- General Education Degree (GED) _____
- Some College X

- Vocational/Technical Degree (Specify Degree) _____
- Associate Degree (Specify Degree) _____
- Bachelor Degree (Specify Degree) _____
- Master Degree (Specify Degree) _____

What type of work did you have the MOST experience with before your incarceration? How many years of experience do you have in this field?

I had a few part-time jobs as a teenager as a teacher's assistant, at a fast-food restaurant, and a grocery store.

Place an "X" by the choice that best describes your employment history record:

None _____ Sporadic Employment X Steady Employment _____
(as a teenager)

Were you employed at the time of your arrest? (Circle One) Yes / No

Were you disabled prior to incarceration? (Circle One) Yes / No
If so, how long?

Indicate your marital status at the time of incarceration by circling one of the following:

Single Married Divorced Widowed

Indicate the number of dependent children you have (under the age of 18): 1

Military Service

Please provide branch, rank, length, awards, and discharge type.

 N/A

Are you aware of the Battle Buddies Program? (Circle One) Yes / No

Are you involved in the Battle Buddies Program? (Circle One) Yes / No

Family Background

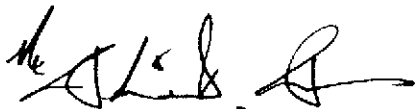
Was there anything in your family background that contributed to/influenced your criminal activity? Explain.

 None

Tribal Information

Are you affiliated with any Native American Tribes? If so, indicate which one and provide CDIB information.

 No



(Signature of Inmate)

 Julius Darius Jones, 270147
(Printed Name and DOC # of Inmate)

 April 28, 2021
(Date)

EXHIBIT E

J. Kevin Stitt
Governor



Tom Bates
Executive Director

State of Oklahoma
PARDON AND PAROLE BOARD

July 30, 2021

Dale A. Baich
Assistant Federal Public Defender, Capital Habeas Unit
850 West Adams Street, Suite 201
Phoenix, AZ 85007

RE: Pending commutation application for Julius Jones, Oklahoma DOC #270147

Dear Mr. Baich:

As you know, Julius Jones' stage II commutation hearing will be held on Monday, September 13, 2021, at 9:30 AM. This letter is to provide relevant information on that hearing and to address the issues, concerns, and questions you have raised.

Mr. Jones' hearing will be the first "enhanced" stage II hearing considered by the Pardon and Parole Board. The enhanced hearing rule was requested by the Board last summer when I determined that Oklahoma law and the Board's administrative code did not bar death row inmates from applying for a commutation. A paramount concern of the Board was that the existing rules for two-stage commutation consideration were inadequate for fulfilling its mission to make a "careful and informed" decision on a matter of such consequence as a capital case. At the time, the existing rules for commutation provided for two minutes of presentation by one delegate, and five minutes of presentation granted to both the District Attorney and the victim.

Under the amended rules, five minutes are granted to each of the three parties for a standard commutation. In addition, the "enhanced" stage II hearing rule grants the Board discretion to augment the time limits and number of speakers on cases that justify it for full consideration. These rules will be published in the *Oklahoma Register* on September 1 and go into effect on September 11. Following the final adoption of these rules, the Board voted at its July meeting to exercise the new rule at its September meeting for Mr. Jones, and Chairman Adam Luck granted 30 minutes to each party for presentation.

Aside from the increased time limits, Mr. Jones' hearing will adhere to the standard policies and procedures that govern consideration of commutation applications. Following the business meeting on September 13, District Attorney David Prater and the registered victim(s) in Mr. Jones case will each have 30 minutes to present. The Board will then break, after which you will have 30 minutes to present as delegate(s) on Mr. Jones' behalf. There is no rebuttal as that is not part of the commutation process. Following your presentation, the Board will ask you any remaining questions they have and then vote on whether to recommend commutation and, if recommended, to what new sentence the Board recommends commuting. Any recommendation would be nonbinding and conveyed to Governor Kevin Stitt for ultimate determination.

During your presentation, it will be at your discretion how to allot the 30 minutes to the speakers in Mr. Jones' delegation. Additionally, you may avail whomever to answer any questions posed by the Board following your presentation. However, the rules do not allow for an additional 15-minute delegate presentation in lieu of an inmate's personal appearance. The only way to accommodate that appeal would be to expand the time limits to 45 minutes to each party. Following your recent request, I spoke with the Board's leadership and confirmed that they feel the 30-minute time limit discussed at the July meeting is appropriate.

Mr. Jones will not receive a personal appearance because of multiple misconducts since the date of his application. The Board is not authorized or equipped to adjudicate the validity of misconducts, and therefore treats them as valid. This Board practice is universally applied and will be controlling for Mr. Jones' hearing. In addition, longstanding Pardon and Parole Board and Department of Corrections policy precludes personal appearances for commutations for inmates who are housed in maximum security. It would violate other similarly situated inmates' due process rights to selectively waive that policy on an ad hoc basis.

Regarding your objection to the Board's consideration of protest letters from the Oklahoma Attorney General, the Board's rules allow anyone to send correspondence. Private citizens' letters, either in support or in protest, are held as confidential while those from public officials are made part of the public record. Each Board member is empowered to give whatever weight they believe is appropriate to any correspondence they receive.

Finally, I am enclosing a thumb drive with the materials the Board will consider ahead Mr. Jones' hearing, including the investigate report. At the May meeting, the Board signaled its intent to continue the hearing of cases when new, substantive, material is submitted late for consideration. For this reason, if you have any supplementary evidence or legal arguments, please provide them to the Board no later than August 13, 30 days prior to Mr. Jones' hearing. You will also receive copies of anything the Board receives.

Let me know if you have any other questions regarding the Board's policies and procedures as you prepare to represent Mr. Jones at his commutation hearing.

Sincerely,



Kyle Counts
General Counsel
Oklahoma Pardon and Parole Board

EXHIBIT F

of documents, with the first document dated July 31, 2002 and last document dated March 22, 2020.

7. The Oklahoma Department of Corrections offender field files are part of a two-file system. The Department keeps an Offender Master File and an Offender Field File on every offender in the Oklahoma Department of Corrections system. The Offender Field File is considered the working file that follows the offender throughout his or her incarceration within the Oklahoma Department of Corrections.
8. Oklahoma Department of Corrections offender field files are divided into six sections:
 - a. Section 1 is all legal documents - J & S, District Attorney Narrative, Jail Time, Warrants, Fingerprints, Photo and Property Sheets etc.
 - b. Section 2 is Good Conduct Credits, Job Evaluations, Anything Involving Time, Audits.
 - c. Section 3 is CAS (Custody Assessment Scale) Profile, Packets, Cell Assessments, Mental Health Documents, Protective Measures, Separatees, Special Offender, Chemical Testing, UA Results, Hobby Craft Applications, Special Inmate Management, Job Assignment Change, IFAF (Inter Facility Assessment Form).
 - d. Section 4 is Adjustment Reviews, Certificates, Level Raises, Visits, New Arrival Information, Needs, Reconciliations, Case Manager Audits and Segregation Reviews
 - e. Section 5 – Parole Consideration Information and Probation and Parole Supervision Information
 - f. Section 6 – Misconducts
9. In addition, I reviewed an Incident/Staff Report and an Offense Report, dated March 6, 2020; Record of Delivery of Copies of Evidence to Inmate, dated March 9, 10 and 11, 2020; Review of Evidence, dated March 11, 2020; and a Disciplinary Coordinator's Report dated March 16, 2020. These documents appear to relate to an incident that occurred on February 28, 2020.
10. Also, I reviewed a Disciplinary Coordinator's Report, Department of Corrections Offense Report, and a Record of Delivery of Copies of Evidence to Inmate all dated April 22, 2020. These documents appear to relate to an incident that occurred on March 6, 2020.

11. Finally, I reviewed a Disciplinary Coordinator's Report, Department of Corrections Offense Report, a Record of Delivery of Copies of Evidence to Inmate, Incident/Staff Report, Witness Discretionary Action Record, and a Record of Chemical Abuse Testing, all related to an incident that occurred on April 29, 2021.
12. In my position as the Deputy Warden, Lexington Assessment and Reception Center, it was my responsibility to interview prisoners sentenced to death as part of the assessment process. I recall having conversations with several men who were headed to death row. Many did not want to discuss the offense. There were others who implied that the victim deserved what they got. One youthful prisoner even stated that his only regret was that he did not shoot more of the victims' family members. I did not interview Mr. Jones. But what struck me about his assessment, was the statement he made upon intake – "I AM INNOCENT AND THEY KNOW IT. I DON'T EVEN FIT THE DESCRIPTION OF THE KILLER."
13. When Mr. Jones arrived at Lexington, he had no psychological or psychiatric history, no history of drug use, and no documented history of violence or domestic violence. He had a prior criminal record for a forged ID and larceny from a retailer. There were two pending charges against him.
14. The intake security assessment for Mr. Jones was Medium. This assessment as well as minimum security risk, has been consistent throughout his custody at the Oklahoma State Penitentiary, McAlester. In addition, there were no discretionary overrides for a higher custody noted; for example, circumstances of the offense, history of violence, documented Security Threat Groups ("STG"), felony detainer/pending cases. He did not escape or attempt to escape from custody. However, because Mr. Jones was sentenced to death, he was designated for maximum placement on death row. When Mr. Jones arrived at Lexington, he was placed in a restrictive housing unit due to his sentence of death. He had no prior history of violence, prior incarcerations or documented STG involvement. After a review of his scale score and all other information, his recommended custody level was maximum security level because of his death sentence.
15. In addition, Mr. Jones' behavior was noted as excellent. Throughout Mr. Jones' time on death row his behavior has been reported as excellent or outstanding. The condition of his cell has been consistently noted as excellent or in good order, and Mr. Jones maintained good hygiene.
16. Prisoners are assigned to one of four class levels. Class level assignments are determined by a facility adjustment review committee based on the desired behavior of the prisoner in all areas of institutional life. Adjustment reviews are conducted every four months or earlier, if the prisoner's status changes. The review evaluates the prisoner's behavior, personal hygiene, cell cleanliness,

attitude toward staff and other prisoners, as well as program participation. The adjustment review determines the prisoner's assigned level. Level 1 reflects a poor evaluation, level 2 is good, level 3 is excellent, and level 4 is outstanding. The exceptions for Mr. Jones were when he received a misconduct and his level was reduced due to those misconducts.

17. It appears that Mr. Jones had support from family and friends during his incarceration. His family has been approved for visits as well as numerous friends. Mr. Jones appears to have kept in contact with family and friends through many non-contact visits at the facility. Allowing visits is used to incentivize good behavior. This also enables the prisoner to strengthen family and community ties. This increases the likelihood of prisoner success if released.
18. Whenever Mr. Jones was assigned a job while in custody, he never refused the assignment. His performance was consistently graded as good.
19. There is a document in Mr. Jones' file dated March 19, 2009, which notes "Demote to L-1 I/M stated he & his cell mate were going to fight U (sic)". However, Mr. Jones' name does not appear on that document. It is unclear who made the quoted statement and the circumstances of this incident are unclear as well. However, it is not unusual for cellmates to irritate one another and request a cell move. It appears these prisoners simply were not getting along. There was no violence related to this incident.
20. In 2013, 2014 and 2015, Mr. Jones received Misconduct Reports for Individual Disruptive Behavior Class X for possession of cellphones. In my review of the file, there was no indication that the cellphones were used to further criminal or gang activity either inside or outside of the prison.
21. After a finding of guilt for the Class X misconducts, Mr. Jones would be demoted to Level 1 earned credits. After he served his sanctions, the misconduct points would drop off and Mr. Jones would gain promotions due to his positive adjustment reviews. Mr. Jones received several misconducts that resulted in sanctions and reduced class levels. Each time that his level was reduced to a level 1 or 2; Mr. Jones was gradually promoted to level 3 or 4. The promotions were due to his positive adjustment reviews.
22. In 2020, Mr. Jones was disciplined for two incidents described in paragraphs 9 and 10 above. I will refer to these matters as the "cellphone charger" and "speakerphone" incidents.
 - a. On March 6, 2020, Mr. Jones was removed from his cell by several Oklahoma State Penitentiary staff. Mr. Jones was subsequently written up

for possession of a cellphone charger allegedly found in his cell. Mr. Jones denied that he possessed a cell phone charger. His counsel requested to view the evidence or be provided with a better photograph of the evidence. I have been advised by counsel that the request remains unanswered.

- b. On April 22, 2020, Mr. Jones was written up for his alleged use of the prison phones while working on February 28, 2020—nearly two months earlier. According to the incident report Mr. Jones was disciplined, in part, for his alleged placement of a conference call. It is my understanding that on February 28, 2020, Mr. Jones made a call to his sister, who is on his approved call list. At that time, she was at an event in Tulsa, Oklahoma that was covered by the news media and she placed Mr. Jones on speakerphone so that he could thank those who were present for their support.

23. On April 29, 2021, Mr. Jones was disciplined. Mr. Jones provided a urine sample that was then subjected to “a substance abuse test.” It was reported that Mr. Jones “failed the test for Benzodiazepines (sic).” The test that was administered was a “Reditest” urine screen. The test was apparently supplied by Redwood Toxicology Laboratory. The specific information that Redwood Toxicology provides for its Reditest Panel-Dipspecifically warns that “The on-site device provides only a preliminary analytical test result.” In other words, in order to make any conclusions about test results, confirmatory testing must be conducted. This requirement is necessary not only for basic factual determination of the Reditest results, but it is even more important if the result “is contested or used punitively.” However, according to documents related to this incident, the required confirmatory testing was not conducted.

24. In addition to Mr. Jones’s ODOC records, I have reviewed intake records from when Mr. Jones was placed in custody at the Oklahoma County Jail in August, 1999. I have also viewed a photograph of Mr. Jones when he was taken into custody by law enforcement on July 31, 1999. Mr. Jones’ ODOC records indicate that he has a number of tattoos, including one that reads “North Side 456 Piru.” The “Be Nauty North Side” and “456% PIRU” do not appear on Mr. Jones prior to his incarceration. In my experience, it is not uncommon for people who enter prison for the first time to quickly learn that they need to clique-up, or affiliate with a group, for protection and to avoid being preyed on.

25. Finally, I reviewed a letter from the Anti-Recidivism Coalition (“ARC”) dated August 2, 2021. In the event Mr. Jones is granted a commutation to time served, ARC, which is located in California, will enroll him into all of its programs. Mr. Jones would be eligible for the ARC housing program. He will be offered a job as a paid intern with the ARC Los Angeles office as a Front Desk Receptionist, where he will learn computer skills, customer service skills, research skills, and soft skills, or said another way, communication, teamwork and interpersonal skills.

While Mr. Jones is an intern, he will be assigned a Life Coach who will help set Mr. Jones up with an individualized plan for employment, education, and long-term goals. This program appears to have the components needed to assist Mr. Jones in transitioning back into the community.

26. I have served with the Oklahoma Department of Corrections for twenty-six years, and as a Member of the Oklahoma Pardon and Parole Board for eight years. Based upon my review Mr. Jones' prison record, he has been in prison since 2002 and his incarceration record does not reflect a history of violent behavior while in prison. He has a few misconducts, but the three most serious ones were for possession of cellphones, and there is no indication that the cellphones were used to promote violence or gang activity. It is my opinion that Mr. Jones could successfully transition to the community provided he has a strong support system in place; a residence; employment or potential employment; transportation; a positive mentor; and access to medical/mental health assistance if needed.

I state under the penalty of perjury under the laws of Oklahoma that the foregoing is true and correct to the best of my knowledge, information, and belief.

Signed this 10th day of August, 2021 at OKLAHOMA CITY, OKLAHOMA COUNTY, OKLAHOMA
(City, County, State)

Clinton E. Johnson
(Signature of Affiant)

CLINTON E. JOHNSON
(Print Name of Affiant)

Subscribed and sworn to before me this 10th day of August, 2021.

[Signature]
NOTARY PUBLIC

My commission expires: 05/12/2025

Commission No. 21006432

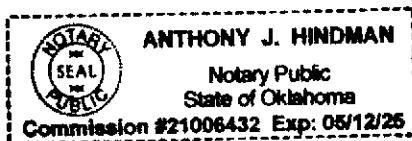


EXHIBIT G



Board of Directors

Carol Biondi
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Dede Gardner
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Javier Stauring
Tim Storey
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Prophet Walker
Kristen Ingram
Brad Slater
Toni Michelle White

August 2nd, 2021

Honorable Kevin Stitt,
Governor of Oklahoma
Oklahoma State Capital
2300 N. Lincoln Blvd.
Oklahoma City, Oklahoma 73105

Oklahoma Pardon and Parole Board
2915 N. Classen Blvd. #405
Oklahoma City, Oklahoma 73106

Re: Julius Jones #270147

Dear Governor Stitt and Members of the Oklahoma Pardon and Parole Board,

The Anti-Recidivism Coalition's (ARC) mission is to reduce incarceration, improve the outcomes of formerly incarcerated individuals, and to build healthier communities. We do this through a growing support network and mentoring programs, connecting members with resource centers that could provide necessary services such as: housing, counseling, job readiness, opportunities and education, while also advocating for a fairer system.

Your office will review whether to grant Mr. Jones commutation of sentence, and if his sentence is to be commuted to time served or is otherwise released, ARC will enroll him into all of our programs. If he is found suitable, ARC will connect him with wraparound services and a supportive network of peers and mentors.

He is eligible for our housing program located in Boyle Heights, California. While in our stable housing program he will be enrolled as a paid intern with our ARC Los Angeles office as a Front Desk Receptionist, where he will learn computer skills, customer service skills, research skills, and soft skills. While Mr. Jones is an intern with us he will be assigned a Life Coach who will help set Jones up with an individualized plan for employment, education, and long-term goals.

ARC has daily groups that will include Addiction Support, Criminal Gangs Anonymous, Anger Management, as well as a variety of evidence based therapy groups, Financial Literacy, Career Readiness Workshop that includes Cognitive Behavioral Intervention (CBI) with job placement.

The employment opportunities will range from our Apprentice Readiness Program that helps formerly incarcerated people get placed in either the L.A. Federation of Laborers Union, Starbucks, L.A. Live Staple Center, and Yerba Maté.

We will also provide him with one-on-one therapy sessions with our licensed therapist. We look forward to supporting and encouraging him throughout his commutation process.

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Lewis".

Sam Lewis,
Executive Director
Anti-Recidivism Coalition (ARC)