



JEAN PETERS BAKER

Jackson County Prosecuting Attorney

May 8, 2021

VIA EMAIL

Robert J. Hoffman
Bryan Cave Leighton Paisner
1200 Main St. Suite 3800
Kansas City, Missouri 64105

Tricia J. Rojo Bushnell
Midwest Innocence Project
3619 Broadway, Suite 2
Kansas City, Missouri 64111

Dear Mr. Hoffman and Ms. Bushnell,

The prosecutor's dual roles are to vigorously and ethically prosecute those who violate the law, and to protect the innocent. To that end, prosecutors have a duty to seek the truth before, during, and after a conviction. The obligations that govern the prosecutor's unique position in the criminal justice system compel us to write this letter.

You contacted my office on November 23, 2020, regarding your client, Kevin Strickland. Mr. Strickland has been in the custody of the Missouri Department of Corrections since a 1979 judgment of the Jackson County Circuit Court in a triple homicide case, CR79-0361.¹ He has served over 43 years of his 50-year sentence. You also referred us to a Kansas City Star article by reporter Luke Nozicka dated last September 27.² After speaking with you and reviewing the article, my office opened an investigation through our Conviction Integrity Unit.³ We ordered the prosecutor file from storage. You provided materials including trial transcripts, a co-defendant's subsequent guilty plea transcript, a 2009 recantation email from the State's key witness, affidavits from the key witness's family and friends, and affidavits from Mr. Strickland's co-defendants. We contacted multiple parties to investigate further.

After a monthslong review, the case was presented to about 20 of our senior and homicide prosecutors. Feedback was solicited, and follow-up investigation was conducted. Our investigation is now complete, and my office has drafted a memorandum analyzing the evidence.

Cynthia Douglas's identification was the cornerstone upon which this entire case rested. The Jackson County Prosecutor concludes that Ms. Douglas sincerely wished to recant, and she truly believed she was mistaken regarding her identification of Mr. Strickland at trial. Based upon the

¹ The homicides occurred on April 25, 1978. Mr. Strickland was tried twice, the first trial ending in a hung jury. At the second trial, capital murder was submitted on all three counts. The jury convicted him of capital murder on the first count, and of murder in the second degree on counts two and three. The jury was polled.

² See <https://www.kansascity.com/news/local/crime/article245920830.html>.

³ Prosecutor Jean Peters-Baker formed the Jackson County Prosecutor's Conviction Integrity Unit in 2017. It examines post-conviction claims of innocence where credible evidence of innocence exists that was not known at the time of conviction.

amount and quality of the evidence available today, this office would not charge Mr. Strickland with any crime. Reliable, corroborated evidence now proves that Mr. Strickland is factually innocent of the charges for which he was convicted in 1979. In the interests of justice, Mr. Strickland's conviction should be set aside, he should be promptly released, and he deserves public exoneration.

The State's case against Mr. Strickland was thin from its inception. It rested nearly entirely on Cynthia Douglas. Ms. Douglas was a traumatized young victim who, that night, had smoked marijuana while drinking cognac. Then she was shot, with her best friend and boyfriend slain next to her. Ms. Douglas's identification was delayed and otherwise was problematic to begin with, even before her credible recantation in 2009.⁴ Immediately after the shooting she named two men, Vincent Bell and Kilm Adkins. They both ended up pleading guilty. She said she only got "a glance" at a third suspect. That night, despite knowing Kevin Strickland, she told police (and signed a statement specifically affirming that) she *did not know* the man with the shotgun. She changed her mind the next afternoon, identifying Strickland only after her sister's boyfriend, Randy Harris, suggested to her that 1) the short man with the shotgun sounded like it could be Kevin Strickland;⁵ 2) Strickland had been with Bell and Adkins that morning;⁶ and 3) Strickland offered Douglas money if she would keep quiet.⁷

Today, we have an improved understanding of the fallibility of eyewitness testimony. That is especially true where, as here, the identification is lacking in meaningful corroboration.

According to the record, that night after the murders, while Bell, Adkins, T.A. and P.H. hid out, Strickland talked with multiple people on the phone about what was happening at his neighbor Bell's house, where police had camped out.⁸ Strickland purposefully initiated contact with police, ostensibly to discern what they knew about his friends' crime.

The day after the murders, Bell, Adkins and T.A. fled to Wichita. Police interviewed Strickland, then 18, who stayed in Kansas City. Strickland's initial statements to police were largely cooperative, including admitting that he had given some green 12-gauge shotgun shells to Bell weeks before the murders, which Bell later corroborated during his plea. Strickland admitted he had been with them that morning. In a then-throwaway detail, Strickland also told police that P.H. was with Bell, Adkins and T.A. when they rode up on bikes to his house that day, at 5:30, on their way to Bell's house. This was corroborated by Bell during his plea. Later in

⁴ It is possible, although not in the record, that the split jury verdicts reflect this.

⁵ At the time, alternative suspect P.H. was 5'6", 130 pounds. Strickland was 5'3", 140 pounds. From photographs, they had similar complexions and hairstyles. At trial, Cynthia Douglas testified she had known Strickland for two to three years. She testified that she did not know P.H. She said the man with the shotgun had facial hair. She did not think it was Strickland at first, because she could not picture him with hair on his face. According to Vincent Bell, at the time, like Strickland, P.H. also had a beard. Strickland's family testified that he had facial hair constantly since middle school.

⁶ Multiple witnesses put P.H. with Bell, Adkins and T.A. at multiple points during that day, including one hour before the murders. A credible non-co-conspirator (Adkins's mom) testified that Strickland was *not* with the others immediately before the murders.

⁷ Douglas mentioned this alleged monetary offer to police as a reason she believed Strickland was involved. Marcus Harris told police that Strickland told him, the day after the murders, that because his neighbor Bell was involved in the homicides, "we" will pay Cynthia to shut up. This is consistent with other evidence that Strickland wished to impress and aid his cool older neighbor, Bell. No witness testified to any such offer at either trial.

⁸ Initials are used herein to identify uncharged co-conspirators. The persons identified by initials have not been charged with or convicted of this crime, and they are presumed innocent unless and until proven guilty.



JEAN PETERS BAKER

Jackson County Prosecuting Attorney

Strickland's interview, when pressed, he mouthed off to police.⁹ The prosecutor highlighted these statements in closing as purported disposition evidence. This office today concludes that Strickland's statements were highly inflammatory, but not inculpatory. They are offensive, but making the statements would not make Strickland guilty of being there that night.¹⁰ And now, no witness places him there. Strickland has paid a steep price for associating with Bell, Adkins and T.A., for mouthing off to police, and for trying to be cool in helping his older neighbor Bell. Strickland had no prior convictions.¹¹

P.H. is a stronger suspect.¹² The evidence puts P.H. with the perpetrators that afternoon, at 5:30 that night, and again right before the murders. Adkins' mom corroborates it.¹³ If it was P.H.

⁹ Two detectives testified that during this interview, Strickland made provocative and inflammatory statements about liking to shoot people and his prowess with guns, which at trial he denied making. Although the two interviewing detectives testified to it, Strickland denied telling police "Book me or turn me loose, but if you do, the next time you come after me you had better draw first, because if you don't, I will draw first and kill you." The police who were out in front of Bell's house testified that Strickland approached them that night and asked about Cynthia Douglas. Strickland asked whether the police would have any clues if Cynthia Douglas died? They said she was only shot in the leg, and Strickland said "if she didn't die, she wouldn't be alive long, because, she can change her name but she can't change her face." He testified at trial that he meant that Bell and Adkins had not been apprehended and they could get to her to silence her. Strickland admitted telling police, "Whoever did it would come back and clean this up," by which he meant killing Cynthia Douglas.

¹⁰ It could be argued that a person who did **not** participate in the crime would be **more** likely to 1) stay in town while others fled; 2) approach police to ask what they knew; and 3) make aggressive statements during a police interview.

¹¹ At the time of his arrest, Strickland did have a prior juvenile arrest and certified charge, but no conviction. According to KCPD reports, on December 12, 1975, victim L.L. described that he had a disagreement with Kevin Strickland. They started towards each other, fists clenched. Strickland's friends started surrounding them, and L.L. picked up a stick from the ground. L.L. stated he said he did not want any trouble. "I started walking out of the yard and Kevin grabbed me by my back coat collar and reached under his coat in the back and drew out a .22 caliber Luger and pointed it at my face and stuck it in my jaw. I backed away out of the yard with my hands up over my head and Kevin fired a shot striking me in my right upper arm and he fired another shot into the ground." L.L. went to the hospital for treatment of a puncture wound to his shoulder. After he was certified as an adult, Strickland was arrested February 27, 1976. The record reflects that Strickland was arraigned February 28, 1976, for assault. The case was resolved short of reaching the trial division, although the particulars of how it was resolved are unclear. The day after the triple murders, P.O. Chambers asked Strickland if had ever been in any trouble before. According to P.O. Chambers, Strickland volunteered that he had previously been to the county jail after shooting L.L.

¹² At the time of the murders, P.H. was 16. Like Bell, Adkins and T.A., P.H. has a criminal history involving armed robberies, including a Robbery 1 conviction stemming from a July 1, 1979, armed robbery at the Bluebird Motel. In that case, defendant P.H. and another co-conspirator demanded money, threatened to kill the victims, and demanded that the victims (a mother, 54, and her son, 18) take their clothes off while holding them at gun point. P.H. had an additional contemporaneous arrest on May 26, 1978, exactly one month after the robbery for which Strickland was convicted. The victim was shot twice in the head, and twice in the chest. The .22 pistol used was recovered. Police also recovered a long gun and ammunition from P.H.'s house when he was arrested. KCPD Report No. L-38493. An eyewitness put both P.H. and his companion D.S. at the scene, explaining that one of the suspects threw a beer can at the victim, complaining that the victim's car was blocking traffic. The victim walked up to the car to confront the suspect about throwing the beer. Then the witness heard shots coming from the suspect's car and saw the victim drop. P.H. was identified as the driver.

holding the shotgun,¹⁴ whom Douglas did not know, that also explains why Douglas signed a police statement that night stating that she did not know the man with the shotgun. Not that she did not get a good enough look at him – that she did not *know* him. Douglas did know Strickland. My office concludes that Douglas talked herself into this identification, after hearing whispers from the Harris brothers.¹⁵

Mr. Strickland has maintained his innocence since 1978.¹⁶ More unusually, his co-defendants have admitted their guilt while steadfastly maintaining Strickland was not there. First Vincent Bell, joined later by Kilm Adkins, even named the alternative suspect, who was short and light-complected like Strickland, and who the file shows was also seen with the co-defendants that day. To that we now add strong, convincing evidence that Cynthia Douglas wished to recant.

In an email to the Midwest Innocence Project (“MIP”) dated February 4, 2009, subject “Wrongfully charged,” Ms. Douglas, by then Cynthia Richardson, who worked in the accounting department of the Jackson County Family Court, wrote: **“I am seeking info on how to help someone that was wrongfully accused, this incident happened back in 1978, I was the only eyewitness and things were not clear back then, but now I know more and would like to help this person if I can.”** It is my office’s conclusion that the email’s circumstances make duress and witness tampering highly unlikely – it was sent at noon on a Wednesday from her Jackson County work email address.

¹³ In an April 27, 1978 police report, Cynthia Canady said that the night of the murders, her son Kilm Adkins came to the residence at around 6:30 or 7:00 and borrowed a bicycle to ride in Swope Park. Kilm was in his Cutlass *with a light complexioned [Black] male* whom she did not know. She added that she had seen her son with this light complexioned [Black] male on one other occasion. She stated her son was only gone about 15 minutes with the bicycle and returned it just before dark. At that time, Vincent Bell and T.A. were in her son’s car. She stated that they all left in the car and she had not seen him since. At Strickland’s second trial, she testified to the substance of this statement. She also testified that she did know Kevin Strickland, and did not know P.H.

¹⁴ The murder shotgun was discovered a week later in a creek behind a Pepsi Plant a mile from the scene. At trial, the print examiner testified that no usable prints were recovered from it. In 2020, the Midwest Innocence Project (“MIP”) inquired and found that KCPD still retained the lifts. KCPD opined that a partial print was now comparable. This was based on new sufficiency techniques and improved analyst skill. The threshold for sufficiency is lower now. With support from the Jackson County Prosecutor Office’s, MIP requested testing. The KCPD crime lab confirmed that the one fingerprint of value was **excluded** as coming from either Kevin Strickland or P.H., and there were no matches in the Automated Fingerprint Identification System (“AFIS”). A test against T.A.’s known prints also came back negative. It is possible that the print was left by Bell, Adkins, the people who found the shotgun, or someone else connected to the gun. Testing could be requested to compare this print to Adkins (the evidence suggests the murder shotgun was most likely his) and Bell; but even if it were a match, that would not be dispositive of whether Douglas saw Strickland or P.H. holding the shotgun that night.

¹⁵ Marcus Harris testified that he sold Adkins a pistol that morning, and Adkins, Bell, T.A. and Strickland were together, along with a male he did not know. Marcus testified that T.A. and Strickland stayed in Bell’s car and did not come inside. Marcus’s brother Randy then told Cynthia Douglas that Strickland had been with the others that morning. Vincent Bell later told the same account during his plea. Bell said the HARRISES may have been concerned about being accessories when that pistol was apparently used in the murders that night, and so they may have been affirmatively trying to help police.

¹⁶ This terrible crime occurred in 1978. There is no statute of limitations for homicide. My office is open to considering new evidence against persons other than Strickland, Bell and Adkins. That said, in order to bring a criminal prosecution, a prosecutor is required to prove her case by the highest burden in our legal system – beyond a reasonable doubt. To meet it, I must be able, today, to introduce admissible, conclusive, corroborated evidence from the witness stand. The case against Strickland was wholly dependent on Ms. Douglas’s identification. Ms. Douglas died in 2015 and Mr. Bell died in 2021. My office does not have sufficient admissible evidence to announce new charges today. But doing the right thing here for Mr. Strickland, given what we now know, in no way depends on obtaining sufficient admissible evidence to ethically support new charges against others.



JEAN PETERS BAKER

Jackson County Prosecuting Attorney

Ms. Douglas's ex-husband stated that Douglas attended Vincent Bell's guilty plea. When Bell named his true accomplices, Ms. Douglas became convinced she had been wrong. She immediately attempted to bring this information forward, he says, but she was rebuffed by someone from the prosecutor's office. Then she sat back for two decades, scared to change her testimony, and scared of the defendant, because her testimony had put him in prison. In 2009, Douglas sent her unequivocal recantation email to the MIP. But evidently no meaningful action was taken, and the situation languished for years.

It is not merely that Ms. Douglas emailed a clear recantation.¹⁷ Three others close to her, including her ex-husband and mother,¹⁸ have submitted affidavits supporting her desire to recant and correct the record.

Ms. Douglas's 2009 email and her three outcry witnesses are corroborated by Vincent Bell's 1979 three-hour allocution prior to Bell's own sentencing. He identified the alternative suspect by name: P.H. Bell named P.H. before Bell was even sentenced, for no deal or other consideration. Like Strickland, P.H. is short with a light complexion. He is still alive today. According to the case file, witnesses placed P.H. with Vincent Bell and Kilm Adkins that day. Adkins's mother, Cynthia Canady, testified at Strickland's second trial. She described Bell, Adkins, T.A. (whom Bell named as the fourth conspirator) and a man she did not know, at her house an hour before the murder. At the time, she well knew Kevin Strickland. This sworn testimony came before her son pled guilty. In other words, Adkins's mom implicated her son but exonerated Strickland under oath, while her son's charges were still pending.

For much of Vincent Bell's unusual allocution, he discussed not his own pending plight, but Mr. Strickland's innocence. He said repeatedly that he was pleading guilty because the State convicted Strickland, who was not even there. In detail, he named Adkins as the sole shooter.¹⁹ Bell described how Adkins and T.A. were angry that day because they were cheated at dice by victim Larry Ingram the week before. Adkins and T.A. hatched the robbery idea to get their money back, enlisting Bell and P.H. to help. Bell's claims at his plea should have been investigated, and reconciled against Strickland's trial evidence, but it appears they were not. However, given the trials that had just occurred, his claims might have seemed incredible. It is not unusual for a defendant to lie in their allocution about the circumstances surrounding their

¹⁷ Ms. Douglas's death in 2015 makes it impossible to obtain further testimony from her.

¹⁸ Mrs. Douglas's strong ratification of her daughter's desire to recant was particularly persuasive to several of the victims' family members who know her.

¹⁹ Bell said during the robbery, he witnessed Adkins kill victim Larry Ingram, first in time, with a pistol. Bell said Ingram threatened he would get Adkins for this. He kept "bulldogging" Adkins, then Adkins freaked out and shot him. The medical examiner testified that Ingram was indeed killed with a pistol. Adkins told Bell he shot the three in the back bedroom to avoid going back to prison – he had to do it, he said, since they were witnesses to him killing Ingram. The medical examiner testified that victim John Walker was killed with a pistol but not a shotgun. Victim Sherri Black was hit with a pistol before being shot twice with a shotgun. Douglas testified that someone pointed a pistol at her, after shooting Walker and Black, and it "clicked." Then later she was hit with a shotgun blast. Bell testified that Adkins told Bell he was aiming for both Black and Douglas. (Bell Plea Tr. at p. 67).

offense. But over the next decades, Bell's allocution became increasingly credible through corroboration by Adkins in 1981, 2014 and 2020; by T.A. in 1998 and 2019; and especially, by Ms. Douglas herself, through her 2009 email plus three corroborating witnesses. In light of this subsequent corroboration, and corroboration through the physical evidence and other detail in the record and case file, my office today deems the core claims in Vincent Bell's allocution credible.²⁰

Two years after Mr. Bell first publicly testified that the man with the shotgun was P.H., not Strickland, Kilm Adkins came forward and also swore that Strickland was not there and is innocent. In 2020, Mr. Adkins specified in an affidavit that it was their other friend P.H., not Strickland. Bell and Adkins did not have an obvious reason to lie one friend out and another friend in. Neither has ever received consideration or any deal for this information. At this point, Bell and Adkins have steadfastly exonerated Strickland and implicated P.H. for over 40 years. Mr. Bell died in 2021.

Without Ms. Douglas's identification, Jackson County would not have been able to charge, much less convict, Mr. Strickland. The jury that convicted Mr. Strickland only heard Ms. Douglas say she was certain it was Strickland, and none of this subsequent evidence. Bell and Adkins still had their own charges pending, and did not testify at Strickland's trials. Because the exonerating evidence came incrementally over decades, and Strickland has represented himself on appeal since 1983, the appellate courts were never presented this full, compelling picture.

My office contacted Assistant US Attorney David Ketchmark at the US Attorney's Office for the Western District of Missouri to request a collateral review. We submitted our findings along with numerous underlying case materials, including trial transcripts, witness and co-defendant affidavits, and Vincent Bell's plea hearing transcript. After thorough review, the US Attorney's Office concluded that, based on the materials submitted and reviewed, it is the independent conclusion of the US Attorney's Office for the Western District of Missouri that this conviction should be set aside, and the evidence supports Kevin Strickland's actual innocence.

Jim Humphrey was the first chair prosecutor at both of Mr. Strickland's trials. He died in 2019. Two additional members of the prosecution team, James Bell and John O'Connor, were contacted. They were provided the new evidence of Douglas's recantation, evidence corroborating the recantation, and the co-conspirators' statements. They are the only two living people from the bench or the prosecutor's office who saw this trial firsthand. They were invested in the case, and initially they resisted the thought that Strickland could be innocent. James Bell, now an attorney in private practice in Kansas City, was Mr. Humphrey's second chair prosecutor at both trials. Mr. Bell told the Jackson County Prosecuting Attorney's Office that he has no independent memory of Vincent Bell's guilty plea and allocution. He also stated:

²⁰ Bell's allocution is substantially consistent with the remainder of the record, including the testimony of witnesses other than Douglas, and the physical evidence at the scene. My office was able to corroborate many portions of Bell's account, but disprove none of his core claims. It would have been difficult or impossible for Bell to concoct his account, and its significant overlap with the accounts of others, and the physical evidence, based on the information available to him. It is noteworthy when an admitted participant in a crime with no known motive to do so identifies another participant who has not been charged, for no consideration, particularly on the eve of beginning a prison sentence. It seems rather unprecedented for that person to reiterate such claims for 42 years, while key pieces of corroboration subsequently surface, one by one.



JEAN PETERS BAKER

Jackson County Prosecuting Attorney

The last thing I want to see is someone serving a 50-year sentence, or even a day, for something they didn't do. If Cynthia was mistaken, then Strickland should go free. I don't know that she was mistaken, but, from everything you're telling me, and everything I learned from the KC Star reporter, it certainly looks like she was mistaken. If that's the case, then he should be set free. If Jim Humphrey were alive, and was made aware of Cynthia's efforts to recant, he would be leading the effort to get Kevin Strickland free.

John O'Connor, now a prominent private attorney in Kansas City, was the prosecutor's office investigator on Strickland's case. He drove Ms. Douglas to Court and came to know her well. He told the Kansas City Star that this case rises and falls on Cynthia Douglas's testimony, and Strickland never could have been charged without her identification. Mr. O'Connor told the Jackson County Prosecuting Attorney's Office:

I saw her testimony at both trials. It was compelling, she was one of the best witnesses I ever saw. Initially I found her recantation hard to believe. But after reviewing the recantation evidence, and the *circumstances* surrounding it, I find it extremely credible. One of the reasons I find it credible is she sent the email on her own, during her work hours, and then nobody followed up. If someone was pressuring her to do it, when she didn't get a response, they would have pressured her to send more emails. That clearly tells me it was her. Clearly she had conscience pangs about it. She was the only witness who got him convicted. Once a credible recantation is in the equation, no conviction should stand against Strickland. It wasn't a wrongful conviction at the time, because she credibly identified Strickland, and 12 jurors convicted him. But it turns out that the wrong person was convicted, simply because she was mistaken. If Jim Humphrey were alive, he would be at the front of the line to get Strickland out of jail.

Prominent Kansas City attorney Tim Dollar was not involved in the trials. But he represented the State during the 1984 litigation of Mr. Strickland's Rule 27.26 motion. Mr. Dollar was provided materials about the case including my office's findings. After considering the new evidence of Douglas's recantation, evidence corroborating the recantation, and the co-conspirators' statements, Mr. Dollar expressed that he strongly supports Mr. Strickland's actual innocence, believes his conviction should be set aside, and he should be exonerated.

Judge Louis Lombardo, who heard the trial case and ruled on the original Rule 27.26 motion, is deceased. I submitted my office's findings and a summary of Vincent Bell's plea hearing to the Honorable J. Dale Youngs, Presiding Judge of the 16th Judicial Circuit. Judge Youngs expressed that, based on his review of the materials provided, he concurs on behalf of the Court that this conviction should be set aside, and agrees that the evidence supports a finding of Kevin Strickland's actual innocence.

My office contacted Kansas City, Missouri, Mayor Quinton Lucas, who is a member of the Kansas City, Missouri Board of Police Commissioners. We submitted our findings and presented the case to him. Mayor Lucas stated, "I am convinced by the corroborated recantation evidence. This conviction should be set aside. Now that we know, he must be released soon, rather than quibble over procedural hurdles. This man has served 43 years for something he did not do."

My office contacted Nathan Garrett of the Kansas City, Missouri Board of Police Commissioners. We submitted our findings and presented the case to him. In a letter dated April 6, 2021, Mr. Garrett wrote: "I have reviewed the materials you sent me and find troubling much of what we discussed regarding the validity of Mr. Strickland's conviction and the length of Mr. Strickland's incarceration relative to others held accountable for the underlying crimes. Taken individually, these issues are concerning; taken together, they are alarming. I am writing to express our support for your review and to assure you that KCPD has no plans to oppose or in any manner hinder Mr. Strickland's efforts to seek exoneration and effect his release."

In April 2021, I met with multiple family members of victims Larry Ingram, Sherrie Black and John Walker. All family contacted said they are still experiencing trauma from losing their loved ones in such a tragic and violent event, even after all these years. They were surprised to learn that new evidence indicates to my office that Mr. Strickland was not present that night. The families are still processing their feelings about this news. Yet, multiple family members told me that they believe the criminal justice system has an obligation to release anyone wrongly accused. The families expressed repeatedly that they do not wish to be contacted by media or others, and they requested further inquiries to be directed to my office. I agreed to assist them.

For these reasons and others, Kevin Strickland's conviction should be set aside, and he should promptly be released and exonerated. This was a thin conviction to begin with and the evidence of conviction has now been eviscerated. The key witness's sincere mistake was not malicious, but now that this mistake is known, it must be corrected. In the broader picture, "Hard 50" is not a sentence Mr. Strickland could even receive today, it was only effective from 1977 to 1984. And his co-defendants, Kilm Adkins (whom the evidence suggests was likely the sole shooter) and Vincent Bell, both received 20 years on their guilty pleas. They served only about 10 years each. Mr. Strickland, now 62, is in a wheelchair and poses no community danger. If he were parole eligible, the State is unaware of anyone who would express opposition. Keeping him incarcerated now on a jury verdict, where the jury heard none of this convincing exculpatory evidence, serves no conceivably just purpose.

Sincerely,



Jean Peters-Baker
Jackson County Prosecutor



Daniel M. Nelson
Chief Deputy Prosecutor