ZAHRA S. KARINSHAK ATTORNEY AT LAW



Direct 404.888.0922 Fax 404.888.9577 karinshak@khlawfirm.com

Alas Raquandia:

This is the case we discussed last week.

Thanks so much for your her and assistance.

Best,

Zahiar

Zahra S. Karinshak



Direct Dial: (404) 888-0922 karinshak@khlawfirm.com

May 3, 2017

Sent Via Federal Express
State Board of Pardons & Paroles
Clemency Division
Attn: Assistant Director Scott Reeves
2 Martin Luther King Jr. Drive SE
Suite 458, Balcony Level, East Tower
Atlanta, Georgia 30334

Re: Request for Parole Reconsideration for Bryan Lamar Harrell – Executive Summary

Dear Pardon and Parole Board Members:

Mr. Bryan Harrell recently received notification from the State Board of Pardons & Paroles ("the Board") that he has a projected parole month of March 2018. For the reasons set forth below, Mr. Harrell respectfully requests reconsideration of this parole decision based on new information not believed to have been previously known to the Board.

As an overview, Mr. Harrell remains in prison on two sets of charges: vehicular homicide for the death of four-year-old Remington Cole Walden, and cocaine possession and illegal use of a communications device. He pleaded guilty to the vehicular homicide charge and a sentence of fifteen years, with eight years of incarceration. Just months after beginning his sentence, the jury in the civil trial concerning the safety of the car in which Remi Walden died reached a verdict. The jury found that Chrysler was ninety-nine percent (99%) responsible for Remi Walden's death – and Harrell just one percent (1%) responsible. Continuing to hold Mr. Harrell fully responsible and imprisoned on vehicular homicide charges is neither merciful nor just. Please see the jury verdict in the Walden v. Chrysler, Superior Court of Decatur County, Civil Action 12CV472, assigning 99% culpability to Chrysler for the death of Remi Walden, attached hereto as Exhibit 1.

Everyone wants justice done, for Remi Walden and for the people of Decatur County. But in the heat of the moment, past conduct may be confused with present culpability. It is at least possible that Mr. Harrell's past history of drug abuse, combined with his initial indictment for driving under the influence in connection with the crash that resulted in Remi Walden's death, affected both the district attorney's decision to maintain the maximum-length vehicular homicide sentence in his offer and Mr. Harrell's attorney's encouragement take the plea, even though the

State Board of Pardons & Paroles May 3, 2017 Page 2 of 3

DUI charge was dropped in advance of Mr. Harrell's plea. The Walden family knew Mr. Harrell was not impaired while driving that day and support granting immediate parole. Please see the victim impact statement attached as Exhibit 2 wherein the Walden family requests that Mr. Harrell receive immediate parole.

More importantly, neither they nor Judge Cato (the sentencing judge) could have known then of Chrysler's extreme culpability in the horrible tragedy of Remi Walden's death. **But everyone knows now.** In cases across the country, when the person who started the car crash was tried for causing serious personal injury or death of a person riding in the Jeep Grand Cherokee **after** news of the faulty gas tank placement was known, **that person was either not convicted or sentenced to much less time than Mr. Harrell received.** This is a matter of justice in law enforcement and of punishing the truly guilty party. Please see the expert report attached hereto as Exhibit 3 for details regarding the *Walden v. Chrysler* case as well as comparable cases across the country.

Another factor at issue here is that it appears from prison and jail records that Bryan has not received credit for the 146 days served in the Decatur County Jail. See Decatur County Jail records, attached hereto as Exhibit 4. If this amount of time were accounted for, Bryan's current projected parole month of March 2018 could justifiably be reduced by approximately 4.866 months, to October 2017. In addition, Mr. Harrell has learned that he has 6 pic/wic points — which could further justifiably reduce his projected parole date by 6 months, to approximately September 2017. If the Board chooses to apply the pic/wic points and credit for time served, a total of 11 months, immediate parole would be warranted under the math.

Significantly, this is not a case of repeated recklessness or callous indifference by the offending driver. Mr. Harrell felt deep remorse and regret for playing any role, however small it has turned out to have been, in Remi Walden's death. He has expressed this regret repeatedly, both then and now. Moreover, his fiancée, Christina Small, has testified to how Mr. Harrell has turned his life around. She wants, and needs, Mr. Harrell home to raise their 4-year-old son, Corbyn, who will turn 5 years old in October. This is the most important developmental time in a child's life, when stability and presence in his parental figures is most needed. Moreover, Mr. Harrell has a strong support network ready and willing to assist. See Family Support letters, attached hereto as Exhibit 5.

<sup>&</sup>lt;sup>1</sup> See, e.g., Commonwealth v. Cruz (Mass. Super. Ct. 2016) (Defendant with lengthy criminal history found innocent of manslaughter but guilty of leaving scene of fatal accident, resulting in 30-month incarceration); State v. Heath (Mich. Dist. Ct. 2015) (Defendant drove 70+ mph in rush hour and had three drunk-driving convictions; wreck led to death of 23-year-old mother and unborn son; Defendant pleaded guilty to misdemeanor of causing a death while driving and was sentenced to ten days in jail, two years' probation, \$4,000 fine, and random drug/alcohol testing); State v. Anderson (Va. Dist. Ct. 2013) (Defendant pleaded no contest to reckless driving and texting while driving leading to two deaths; sentence included four months' incarceration w/240 days' suspended, two years' probation, and \$2,500 fine).

State Board of Pardons & Paroles May 3, 2017 Page 3 of 3

For all of these reasons, Mr. Harrell and his loved ones respectfully request that the Board reconsider the current projected parole month of March 2018 and grant immediate parole.

Sincerely,

Karinshale

### IN THE SUPERIOR COURT OF DECATUR COUNTY STATE OF GEORGIA

JAMES BRYAN WALDEN and LINDSAY NEWSOME STRICKLAND, Individually, and on Behalf of the Estate of Their Deceased Son, REMINGTON COLE WALDEN, Plaintiffs.

CIVIL ACTION FILE NO. 12CV472

VS.

CHRYSLER GROUP LLC, n/k/a FCA US LLC and BRYAN L. HARRELL,
Defendants.

SPECIAL INTERROGATORIES AND VERDICT

In the matter above-styled, we the jury find as follows:

### Answer the following questions:

1. Do you find that Chrysler Group acted with a reckless or wanton disregard for human life in the design or sale of the 1999 Jeep Grand Cherokee and that such conduct was a proximate cause of damages for which the Plaintiffs may recover?

<u>46</u> (yes or no)

2. Do you find that Chrysler Group had a duty to warn and failed to warn of a hazard associated with the use of the 1999 Jeep Grand Cherokee and that such failure to warn was a proximate cause of damages for which the Plaintiffs may recover?

Ve5 (yes or no)

3. Do you find that Defendant Bryan Harrell's negligence, which he has admitted, proximately caused damages for which the Plaintiffs may recover?

yes or no)

4. State the amount of damages, if any, you find Plaintiffs are entitled to recover from the Defendant or Defendants you have found responsible for:

Pain and suffering:

s Contitions 30 William

Med in Open Court

Date: 4-3-15

Time: 6-30 preDecorat County, Georgia

SO SAY WE ALL.

This 2nd day of April, 2015.

Foreperson

### Zahra S. Karinshak

Subject:

FW: Bryan Lamar Harrell

From: Jeb Butler

Sent: Thursday, April 20, 2017 11:43 AM To: parole.consideration@pap.ga.gov

gfloyd@floydkendrick.com; lcathycox@yahoo.com; David Rohwedder < Rohwedder@butlerwooten.com >; Beth Glen

<beth@butlerwooten.com>; Karsten Bicknese <kbicknese@sktblaw.com>; robmclendon4@hotmail.com;

csmall91@yahoo.com

Subject: Bryan Lamar Harrell

Dear all,

Questions have recently arisen regarding the positions of Lindsay Strickland and Bryan Walden regarding leniency for Bryan Lamar Harrell. We have been asked to provide that position in writing. The position of Ms. Strickland and Mr. Walden is set out below. (The below email was first sent on 01/16/17.)

Regards, Jeb Butler

From: Jim Butler

Sent: Monday, January 16, 2017 11:32 AM

To: 'parole.consideration@pap.ga.gov' parole.consideration@pap.ga.gov>

Cc: 'ndavis@pacga.org' <ndavis@pacga.org>; Lindsay Newsome Strickland (lindsaystrickland@yahoo.com)

< lindsaystrickland@yahoo.com >; Bryan Walden (bryanw@pepifoods.com) < bryanw@pepifoods.com >;

 $\underline{jeb@butlertobin.com}; George\ Floyd\ (\underline{gfloyd@floydkendrick.com}) < \underline{gfloyd@floydkendrick.com}>; Cathy\ Cox\ Personal\ (\underline{lcathycox@yahoo.com}) < \underline{lcathycox@yahoo.com}>; David\ Rohwedder < \underline{Rohwedder@butlerwooten.com}>; Beth\ Glender < \underline{Rohwedder@butlerwooten.com}>; David\ Rohwedder < \underline{Rohwedder@butle$ 

<beth@butlerwooten.com>

Subject: Re: Bryan Lamar Harrell ZX 794951 Indictment Number: 14CR00168 - Request for Clemency

To: Pardons & Paroles Board:

We have been asked to respond to the "solicitation for stakeholder input" on behalf of our clients Lindsay Newsome Strickland and Bryan Walden, parents of Remington Walden, who died on March 6, 2012.

Please pardon our delay – there was a delay in transmitting the "solicitation" to our clients and some computer problems on their ends which delayed transmission directly from them.

On behalf of Ms. Strickland and Mr. Walden, this is their response to the "solicitation:"

Dear Board Members:

Our son Remington Cole Walden was killed on March 6, 2012 in a wreck in Bainbridge, Georgia. The car in which our son was riding was struck in the rear by a truck driven by Bryan Harrell. The car was a 1999 Jeep Grand Cherokee with a rear-mounted gas tank. Because of the location of the gas tank, the impact caused a gas tank explosion and fire. *That* is what killed our son.

We have always believed and contended that while Mr. Harrell caused the wreck, Chrysler (now "Fiat Chrysler Automobiles" or "FCA") caused our son's death. The gas tank design on that Grand Cherokee was defective and dangerous – and Chrysler knew it. Chrysler's own engineers admitted as much at the trial of our civil case. Mr. Harrell, by contrast, acknowledged his responsibility for the wreck itself from the start.

A jury of twelve Decatur County citizens clearly agreed: at the civil trial, on April 2, 2015 they voted unanimously to apportion 99% of the fault for our son's death to Chrysler, and only 1% of the fault to Mr. Harrell.

We believe Mr. Harrell has been adequately punished, and deserves clemency now. He has a wife and a young child. He was and is filled with remorse: that was obvious both before the civil trial and when he tearfully testified at the trial of our civil case. This tragedy has tormented Mr. Harrell enough. He is punished every day, regardless of whether he is in prison or not.

We would ourselves like closure from this tragic loss. Knowing Mr. Harrell is no longer being punished by the State under these circumstances would be very helpful and meaningful to us both.

We strongly urge that the Board release Mr. Harrell. We urge the Board to do so immediately, rather than waiting until May 17, 2017.

Thank you for your consideration of this request.

Sincerely

Lindsay Strickland & Bryan Walden

Jeb Butler Butler Tobin LLC

<sup>&</sup>quot;If a man has any greatness in him, it comes to light, not in one flamboyant hour, but in the ledger of his daily work." - Beryl Markham

1932 North Druid Hills Rd.

Suite 250

Atlanta, GA 30319

Telephone: 404-587-8423 Facsimile: 404-581-5877 jeb@butlertobin.com www.butlertobin.com

## BUTLER TOBIN

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## IN THE SUPERIOR COURT OF DECATUR COUNTY STATE OF GEORGIA

| THE STATE OF GEORGIA | Criminal Action        |
|----------------------|------------------------|
|                      | Case Number 14CR-00168 |
| Versus               |                        |
|                      |                        |
| Bryan Lamar Harrell  |                        |

### STATEMENT OF FACTS

The focus of this document will be <u>exculpatory evidence</u> that was accessible to all relevant parties prior to, during, and subsequent to a plea that was hastily and mistakenly tendered by criminal defendant Mr. Bryan L. Harrell at a hearing of October 14, 2014 before the Honorable Judge A. Wallace Cato. The evidence is relevant to the following <u>merged</u> counts against Mr. Harrell:

- A. 'Homicide by Vehicle in the First degree', on the date of March 6, 2012,
- B. 'Reckless Driving' on the date of March 6, 2012.

I will present perspective on the <u>true cause</u> of the tragic death of Remington Walden which occurred on March 6, 2012. We review how similar deaths were obscured from the public under the provisions of "protective orders," and "confidentiality agreements," entered by the Fiat Chrysler Automotive group (FCA) in numerous prior similar accidents.

I was the first safety expert to contact members of the Georgia State Police (GSP) involved with the accident scene of March 6, 2012. I subsequently telephoned the office of the District Attorney (DA) for the South Georgia Judicial District. In both conversation scenarios of March/April 2012. I specified that my purpose was a photographs-only inspection of the vehicle driven by Mr. Harrell, and the 1999 Jeep Grand Cherokee which, at the time, was the focus of a government defect investigation that I helped initiate (Please see paragraph 9 and page 16 below). These conversations took place immediately after the Jeep fire-death of Remington Walden on March 6, 2012.

### PROFESSIONAL BACKGROUND INFORMATION - CURICULUM VITAE

- 1. My name is Paul V. Sheridan. I have resided in Dearborn, Michigan for 37 years. The facts and opinions of this Statement are known to me personally or professionally and have been formed based upon my experience(s), training, education, observations, knowledge, and review of relevant literature. I base this Statement of Facts upon extensive direct vocational and professional review and experience with automobiles and the automotive industry.
- 2. I hold a Bachelor's of Science Degree (BS) in Mathematics and Physics conferred in 1978 by the State University of New York. I hold a Master's in Business Administration (MBA) in General Management and Logistics conferred by Cornell University in 1980.
- 3. After graduation from Cornell University I was hired by Ford Motor Company, where I worked from 1980 until 1984. My responsibilities included program management, vehicle production planning, powertrain planning, and regulatory affairs. I was promoted twice and awarded several substantial salary increases.
- 4. In July 1984 I accepted an unsolicited offer from Chrysler Corporation, where I worked from July 1984 until December 1994. During my career at Chrysler I worked as a manager in future product planning, and engineering programs management.
- 5. As an engineering programs manager (EPM) I was responsible for the work of both internal engineers at Chrysler and external engineers at Chrysler suppliers. In 1985 I won the coveted "Chairman's Award" from Chairman Lee A. Iacocca; an award bestowed only three times in his career. As an EPM I received recognition in the Chrysler Times magazine. To the best of my knowledge I am the only EPM in Chrysler history to receive such recognition. My work as an EPM was recognized numerous times by the Society of Automotive Engineers (SAE), including but not limited to expertise interview reports in their world famous Automotive Engineering publication.

- 6. In late 1992, Chairman lacocca and his executive staff appointed me to head the internal Safety Leadership Team (SLT), which I chaired from 1992 to 1994. My efforts as chair of the SLT have been recognized by state courts, federal courts, and the United States Supreme Court; the highest court in the land. My efforts as SLT chairman have been featured by innumerable national and international media, including ABC News 20/20, the Wall Street Journal, ABC News Primetime, the British Broadcasting Company, the New York Times, local television news programs, etc.
- 7. In 2005 I was given the National Champions award from the Civil Justice Foundation (CJF) in Washington DC. I am the only CJF National Champion in history to be awarded for efforts in transportation safety. I was nominated for the CJF award by the president of the American Bar Association.

### SPECIFIC PROFESSIONAL BACKGROUND EXPERIENCE: THE JEEP

- 8. I am an expert on the fuel system crashworthiness of the Jeep vehicles. This expertise has been utilized in litigation, government investigations and news reports.
- 9. I was co-petitioner with the Center for Auto Safety (CAS in Washington DC), wherein we petitioned the Federal Government to conduct a <u>safety defect</u> investigation of the crashworthiness of the Jeep Grand Cherokee fuel tank system. This petition was submitted to the National Highway Safety Administration (NHTSA) on October 2, 2009. Portions of the petition were authored by the undersigned:
  - a. As a result of the CAS petition, NHTSA opened a formal investigation of the <u>lack</u> of Jeep fuel tank system crashworthiness on August 23, 2010.
- 10. My work with the CAS dates to 1994; my expertise is well-known to and relied upon by CAS. As part of our petition efforts, I assisted CAS with their Jeep Grand Cherokee fuel tank crash test programs. My roles included vehicle configuration confirmation, test procedure protocol, and post-test inspection and reporting. I represented CAS and was present for the crash testing at the Karco Engineering facility in Adelanto, California (please see sample photographs of my role on next page):





11. I personally inspected the vehicles and Jeep components involved in the CAS/Karco crash tests, including that of January 14, 2011:

TEST REPORT FOR:

### The Center for Auto Safety

50 mph Vehicle to Vehicle 30% Offset Rear Impact



50 mph Vehicle to Vehicle 30% Offset Rear Impact 1999 Jeep Grand Cherokee Laredo 1987 Ford Taurus

PREPARED FOR:
The Center for Auto Safety
1825 Connecticut Ave, NW
Washington, DC 20009

TEST REPORT NUMBER:

TEST DATE:

January 14, 2011

REPORT DATE: February 10, 2011

- a. The January 14, 2011 CAS/Karco crash test involved the <u>exact</u> model year and vehicle type which caused death on March 6, 2012 in Bainbridge, Georgia,
- b. This 1999 Jeep Grand Cherokee crash test was conducted at 50 mph, wherein fuel leakage occurred, and therefore a fuel tank crashworthiness failure.
- c. These results were shared with Fiat-Chrysler Automobiles (FCA), the defendant in the trial of Walden v FCA, where the jury verdict asserted a safety defect in the 1999 Jeep Grand Cherokee wherein Remington Walden was a rear seat passenger (Civil Action 12CV472 of April 2, 2015).
- d. Disputed by the plaintiff attorneys and Mr. Harrell as lower, the collision speed of March 6, 2012 was not more than 50 mph. The CAS/Karco crash test failure was shared with defendant FCA more than a year prior to that accident.

### FACE-TO-FACE MEETING WITH THE NHTSA ADMINISTRATOR: CONCEALMENT OF THE 1978 BAKER MEMO

12. In May 19, 2010 I was invited to testify at the US Senate *Committee on Commerce, Science, and Transportation*; Senator Jay Rockefeller presiding. The invitation came from Mr. Clarence Ditlow, Director of the Center for Auto Safety (CAS). My role was to assist Mr. Ditlow with rescinding proposed legislation that would have restricted the legal rights of the so-called "whistler-blower." The legislation was shelved as a result of this hearing.

At the conclusion of this hearing I was formally introduced to NHTSA Administrator David Strickland. In the presence of Mr. Ditlow and many others, I voiced a concern with Mr. Strickland that the Jeep fuel tank defect petition (paragraph 9 above) under his purview was not lawfully receiving complete files from Fiat-Chrysler Automobiles (FCA). Having reviewed the NHTSA file in-detail, I explained that a key internal document, *The Baker Memo* of 1978, had not been submitted. I emphasized the second page of that memo:

Chrysler is investigating fuel tank relocation ahead of the rear wheels for vans and multi-purpose vehicles, but present plans for pickups through 1983 and for MPV's and vans through 1985 have the fuel tank located behind the rear wheels. In vehicles both with and without bumpers there is a concern with vertical height differences that create a mismatch with passenger car bumpers. Where fuel tank location behind the rear axle is all that is feasible, a protective impact deflection structure may have to be provided whether or not a bumper is provided. An investigation whether to relocate the fuel tank or to provide impact deflecting structures is presently underway.

After hearing of its content, and its concealment by FCA from the petition process, NHTSA Administrator Mr. Strickland demanded that he receive a copy directly from me.

I came into possession of the Baker Memo as part of my duties at Chrysler. In 1987 I made a formal presentation involving the memo at the Engineering Programs Review (see paragraph 5 above). The Vice President of Jeep and Dodge Truck Engineering (JTE), Mr. Francois J. Castaing, presided over and was present for my presentation(s). Mr. Castaing has been promoted as **The Father of the Jeep**. As such he had overall product and engineering responsibility for the Jeep fuel system design(s), including crashworthiness.

## TESTIMONY REGARDING JEEP CRASHWORTHINESS: FRANCOIS J. CASTAING – FATHER OF THE JEEP

13. Perspective on the tragedy of March 6, 2012 is incomplete without knowing the <u>attitudes</u> and capabilities of the key individual responsible for the <u>design philosophy</u> of the 1999 Jeep Grand Cherokee. The *Father of the Jeep*, Mr. Francois Castaing embodies an important portion of that perspective.

On March 14, 1996, while overseeing Jeep <u>design philosophy</u>, development and testing, for the 1999 Jeep Grand Cherokee, Mr. Castaing testified in the Jeep crashworthiness case of *Tenaglia v Chrysler*. In that deposition, by plaintiff attorney Lawrence Coben, the *Father of the Jeep* testified as follows:

Coben: What does the term

crashworthiness mean in terms

of design of a product?

Castaing: I don't know. Tell me.

Coben: You don't know the phrase?!

Castaing: No.

Coben: Well, let me make sure I'm clear

on this. As the chief engineer of the company, are you at all familiar with the use of the phrase crashworthiness by the engineers of the company?

Castaing: Crashworthiness is so vague

that you have to tell me what

you intend by that.



In 1987, as an Engineering Programs Manager at JTE, I made a presentation to Castaing that included the **Baker Memo**. I proposed that the upcoming Jeeps, including the Grand Cherokee be based on an alternative design that relocated the fuel tank from its vulnerable unprotected rear-most position, to a location that more easily sustains crashworthiness; a middle position. Mr. Castaing, and executives above him, rejected my recommendation. In the Grand Cherokee death case of *Kline v Chrysler*, in my presence, Castaing admitted that my recommendation had been made, but was rejected (Page 16 below).

## SWORN TESTIMONY REGARDING JEEP CRASHWORTHINESS: THE TESTIMONY OF CHRYSLER EXPERTS

14. I was also present at the deposition of the Chrysler 'fire source and causation' expert and former Chrysler employee colleague, Mr. Robert D. Banta. After decades of association I can attest to his competence and integrity. I photographed the Jeep Grand Cherokee below, prior to its crash test of May 16, 2011, anticipating a crashworthiness test failure, and defense expert depositions such as that of Mr. Banta.

In the same Jeep fire death case of *Kline v Chrysler*, on September 7, 2012, <u>mere months</u> <u>after the fire-death of Remington Walden on March 6, 2012</u>, when confronted with my photo, Mr. Banta testified to plaintiff attorney Ms. Angel Defilippo as follows:



DeFilippo: Now, in looking at that photo, can you tell me what part of the vehicle

protects the part of the tank that we're looking at in that photograph?

Banta: No. It's covered by the fascia.

DeFilippo: So if a vehicle were to strike just that yellow piece of the car, whether it be

because it's lower or some kind of vehicle that's not even a car, let's say it was a recreational vehicle of some sort, what would protect that portion of

the tank that we see here in yellow.

Banta: Just the tank surface itself.

DeFilippo: So in other words, whatever the material of the tank is at the time?

Banta: The tank's on its own.

15. The following photographs depict what happens at a mere 40 mph, in a rear crashworthiness test of a Jeep Grand Cherokee; equivalent in all relevant design parameters to the Jeep that caused the tragic death of 4-year-old Remington Walden:





- 16. In paragraph 13 I discuss the "design philosophy" of Mr. Castaing. By enforcing a philosophy that locates the fuel tank in the rear-most position (yellow, page 8), he also projected that location philosophy into future Jeep models such as the 1999 Jeep Grand Cherokee (and the Jeep Liberty model). **ALL** of these have been the cause of horrific injury and death litigation. **ALL** of the associated litigations have been subject-to "confidentiality agreements," making prior knowledge of the technical facts of these Jeep defects and associated tragedies inaccessible to the Walden family . . . or Bryan Harrell.
- 17. As history has shown, my 1987 recommendation of an alternative vehicle base design philosophy was not enacted until the 2005 Jeep Grand Cherokee . . . a design that moved the fuel tank to the "mid-ship," the exact location recommended by me in 1987, and Leonard Baker in 1978! Since German engineers redesigned the Jeep Grand Cherokee, not one rear collision fuel fed fire injury or death has occurred.
- 18. On January 23, 2015, in the death case of Walden v FCA, Chrysler expert Mr. Philip Cousino testified that the revised design <u>philosophy</u> of the 2005 Jeep Grand Cherokee, which would have protected Remington Walden, involved the highest levels of German management:

Attorney: Isn't it true that the 2005 model year Grand Cherokee had the gas tank midships?

Cousino: Yes.

Attorney: All right. Now, you said in one of your answers previously that the architecture of

the vehicle starts as an idea. Whose idea was it to put the gas tank in the midships

location rather than at the rear?

Cousino: I don't know . . . I think that Dieter Zetsche and Wolfgang Bernhard, who were the CEO and COO of the company, both from Mercedes, were involved in that decision.



19. But an <u>informed customer</u> need not wait for Germany's redesign of the 2005 Jeep for a layout that eliminated the vulnerable and defective rear-most fuel tank location . . .

On August 5, 2010, two years before defendant Bryan Harrell collided with a defective 1999 Jeep Grand Cherokee, the CAS conducted a rear crash test its primary competitor: the Ford Explorer. I immediately uploaded these test videos to my YouTube account:



This test was not conducted at 10 mph. Not 20 mph. Not 30 mph. Not 40 mph. Or the <u>alleged</u> Bryan Harrell collision speed of 50 mph. This test was <u>not</u> conducted at 60 mph.

<u>The Ford Explorer was hit at 70 mph</u>. The amount of fuel system leakage? **Zero**. The probability of a post-crash fuel tank fire in this Ford Explorer test? **ZERO**.

It is unlikely that the Waldens would have purchased their 1999 Jeep <u>had they been</u> <u>informed</u> of its fuel tank crashworthiness defect, versus the fact that competitive models such as the Ford Explorer have never been part of a government investigation, contain no such defect, and would have protected their son Remington from fire-death.

20. In the context of my professional experience, I ask the following question:

If, on the date of the Bryan Harrell collision of March 6, 2012, Remington Walden been a passenger in a mid-mounted fuel tank vehicle, such as the original Ford Explorer or the 2005 Jeep Grand Cherokee, what would be the likelihood that Remington's autopsy would have declared his death causation as follows (screenshot)?

#### Cause of Death:

Thermal Injury In conjunction with a right femur fracture

LH

Pathologic Diagnoses:

Thermal injurywith predominant charring, 100% body surface area Right femur fracture

ZERO . . . because other than the fuel tank fire, the accident was survivable . . . and therefore Remington would be alive today.



Dr. Maryanne Gaffney-Craft, Regional Medical Examiner for the South Georgia Judicial Circuit, testifying at the Jeep fire death trial of Walden v FCA.

### Statement Summary Opinion for Paragraphs 8 through 20

- I. If information regarding the scores of prior death cases, involving defective Jeep fuel tank systems, had not been obscured from public scrutiny via "confidentiality agreements," it is likely that the Walden family would not have purchased their 1999 Jeep Grand Cherokee in the first place.
- II. Mr. Bryan Harrell, a tenth grade education roofing laborer had the deep misfortune of colliding with the wrong SUV on March 6, 2012.

Had Remington Walden been a passenger <u>in just about any other brand SUV</u>, the accident would not have been catastrophic. An excerpt of March 25, 2015, from the trial testimony of criminal defendant Mr. Harrell, in the Jeep death case civil matter of Walden v FCA:

| _  |   |
|----|---|
| 1  |   |
| 1  | A I would believe that, yes, sir.                             |
| 2  | Why were you crying, Bryan?                                   |
| 3  | A (Weeping.) Same reason now, I guess.                        |
| 4  | Q Why is that?  |
| 5  | A I feel sorry for the family. Guilty somewhat for the        |
| 6  | little boy's death.   |
| 7  | Did you deliberately, on purpose, hit the back of             |
| 8  | that Jeep?  |
| 9  | A Of course not.  |
| 10 | Did you intend to cause any harm to Remi Walden?              |
| 11 | A No, sir.  |
| 12 | Did you know that that Jeep had a gas tank on the             |
| 13 | back of the Jeep that was just 11 inches from the back of the |
| 14 | Jeep hanging 6 inches below the bottom of the Jeep? Did you   |
| 15 | know that before this accident happened?                      |
| 16 | A No, sir.  |
| 17 | Q Had you ever noticed where gas tanks were on Jeeps          |
| 18 | like that?  |
| 19 | No, sir. Never paid any attention.                            |
| 20 | Did you know the gas tank on that Jeep was totally            |
| 21 | unprotected from rear impact?                                 |
| 22 | A No, sir.  |
| 23 | You were driving a 1997 Dodge Dakota pickup, were you         |
| 24 | not?  |
| 25 | A Correct.  |
|    | 688   |

### THE JEEP FIRE INJURY / DEATH CRISIS: A HISTORY OF CRIMIAL PROSECUTION AGAINST SECONDARY VICTIMS

21. Hundreds of Jeep fire injury/death cases have been litigated over several decades. In nearly all the secondary victim, the offending driver, has either been considered for criminal charges or had been formally charged. The following is a very small sampling:

### Kenneth Smith versus DaimlerChrysler

On October 6, 2001 Mr. Smith was rear-ended while driving his Jeep Grand Cherokee. The accident geometries and parameters were very similar to that of March 6, 2012. Mr. Smith's Jeep instantaneously burst into flames and, although he survived, he was horribly burned. As an initial, but emotional and uniformed reaction, the local prosecutor considered charging the offending driver . . . until he discovered that the offending driver was a Florida State Police officer:



The Smith v DaimlerChrysler matter was settled under a "confidentiality order."

Total time that the offending driver, the secondary victim, was incarcerated: ZERO.

### Jarmon versus DaimlerChrysler

On February 6, 2006, four-year-old Cassidy Jarmon was a Grand Cherokee passenger, positioned in the same location as four-year-old Remington Walden. After being rear-ended the Jeep instantly burst into flames. Both parents, positioned in the front seats barely escaped, but could not save their daughter as the inferno overtook the entire scene.



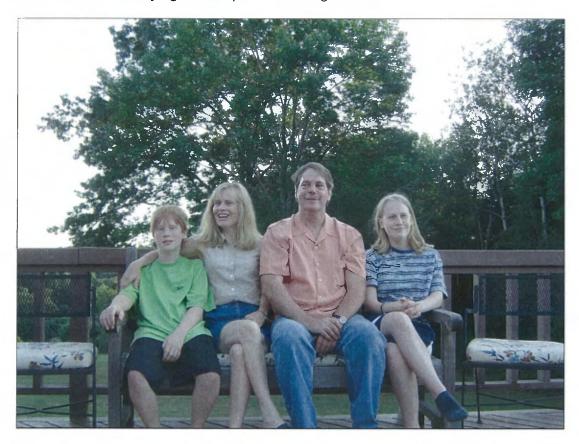
Criminal charges against the offending driver were considered, but never filed when it was revealed that the autopsy report declared that the accident was not the cause of Cassidy's death; that "fire and smoke inhalation" was the true cause.

Total time that the offending driver, the secondary victim, was incarcerated: ZERO.

### Kline versus Chrysler Group

The horrific Jeep fire death of wife and mother Susan Kline was a major motivating factor in the Center for Auto Safety (CAS) petition to the federal government to investigate the lack of Jeep fuel system crashworthiness; the proverbial "final straw." An attachment, that I authored is dedicated to Mrs. Kline, and was included in the petition of October 2, 2009. I was involved from the very beginning, in all aspects of the Kline litigation.

On February 24, 2007 the Grand Cherokee being driven by Mrs. Kline was rear-ended. Her Jeep instantaneously burst into flames. Pictured here with her family mere weeks before, Mrs. Kline died trying to escape the conflagration:



None of the other persons involved in the accident were injured.

Criminal charges against the offending driver were filed by New Jersey authorities. But as the case against Chrysler proceeded, and the true cause of death, fire, was repeatedly affirmed, all criminal charges were dropped.

Total time that the offending driver was incarcerated: ZERO.

### Sanchez versus Chrysler Group

On April 5, 2014 the Sanchez brothers, Magdaleno and Raymundo, able-bodied construction workers, were rear-ended on their way home from work. Upon collision, their Grand Cherokee instantly burst into flames. The doors were <u>characteristically</u> jammed and, just like Mrs. Susan Kline, Magdaleno and Raymundo were trapped.

They suffered <u>no injury from the collision</u>, but the fire immediately reached their front seats, and both brothers are burning; <u>a scene straight from Hell itself</u>. But unlike Mrs. Kline, Magdaleno was very strong, he was able to break his driver's side door glass to escape. Rushing to the passenger side, he smashed that glass, breaking his hand in the process, and removed Raymundo while he was still burning. Both escaped with their lives. But horribly burned, neither will ever work again . . .

I was involved from the very beginning, in all aspects of the Sanchez litigation. Their Jeep was <u>rear-ended by a little Honda Civic</u>. The offending driver, after impact, simply opened her door and got out. She suffered no injuries, and refused medical attention. Initially she was accused of causing the following scene on a Los Angeles highway:

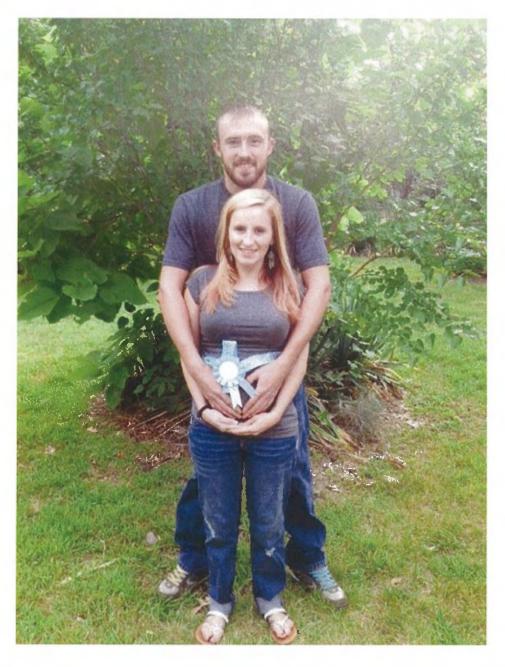


Criminal charges against the offending driver were filed by California authorities. But as the case against Chrysler affirmed that the true cause of the fire, and the horrible burn injuries to the Sanchez brothers, was a defective Jeep, all criminal charges were dropped.

Total time that the offending driver was incarcerated: ZERO.

### White versus FCA

Very few, if any, are more qualified than I to declare the "worst" of the Jeep fire death accidents. But if I were compelled, it would be the horror of November 11, 2014 which took the life of expecting mother Kayla White and her eight-month-term son Braedon:



The Michigan accident scene was so horrific that one paramedic resigned, and another is still undergoing psychiatric assistance.

It is alleged that the offending driver was guilty of distracted driving just before colliding with the rear of Kayla's 2003 Jeep Liberty vehicle. In my professional opinion the Jeep Liberty has a fuel system design that is . . . as astounding as this might seem . . . more incompetent, and even *less* crashworthy than the Jeep Grand Cherokee that caused the death of Remington Walden. The Jeep Liberty was added to the NHTSA investigation that was initialized by the CAS petition (paragraph 9 above).

Criminal charges were filed against the offending driver, not felony charges but only a misdemeanor in connection to, not one death but two deaths: Kayla and Braedon.

This Jeep fire death was mere weeks before the Harrell plea of October 14, 2014. Similar to the Harrell plea sequence, the offending driver in Michigan (1) accepted advice of his criminal defense lawyer and, (2) did so **prior** to adjudication of the product defect case:



DATE OF AUTOPSY: November 12, 2014 TIME: 8:50 a.m.

CAUSE OF DEATH: THERMAL INJURY and SMOKE INHALATION

MANNER OF DEATH: ACCIDENT

Total time that the offending driver in Michigan was incarcerated after pleading "Guilty" regarding the death of not one, but two people??

#### **TEN DAYS!**

### The Commonwealth of Massachusetts versus Joel Cruz

Please note . . . I have revised the title format <u>and context</u>. In the prior samples I have listed Chrysler as the defendant.

The narrative that follows, regarding the Cruz matter, is offered as the most compelling regarding the injustice that continues to afflict Mr. Bryan Harrell of Bainbridge, Georgia.

The readers of this Statement may find this revised context deeply indicative.

You may also see that the reason a civil product case was never even filed in the Jeep fire death case in Massachusetts is even MORE INDICATIVE.



The Massachusetts criminal case against Mr. Cruz, relating to the Jeep fire death of seventeen-year-old Skyler Anderson (pictured), is striking for the following reasons:



- A. In stark contrast to Defendant Harrell's behavior post accident, the Cruz behavior post accident in Massachusetts was utterly despicable.
- B. Like Bainbridge, the Springfield, Massachusetts community was deeply traumatized by the way Skyler was killed. Springfield was especially animated about the post-accident behavior of Mr. Cruz.
- C. The Springfield community, the police, the court, the jury, and their District Attorney were, proverbially speaking, "out for blood," regarding Mr. Cruz.
- D. This "out for blood" atmosphere was what I encountered when asking to travel to Springfield, to do a photos-only inspection of the affected vehicles.
- E. The <u>adjudication sequence</u> regarding the offending driver was the same as White and Walden: That is, the criminal case against Cruz was hurriedly orchestrated **prior** to the civil products litigation wherein the issue of a Jeep safety defect as exculpatory evidence, would be fully exposed.

F. I received several return calls from the Springfield authorities. The Springfield District Attorney sent an email acknowledging my person, my purpose and, most relevant to this Statement, his recognition that a safety issue existed with the Jeep Grand Cherokee that killed young Skyler on the evening of November 10, 2013:

Mr. Sheridan

There is an active criminal investigation in this matter. I must deny your request.

I am aware of the subject matter and your purpose for viewing the vehicle. All requests for access are being denied.

Sent from my Android phone using TouchDown (www.nitrodesk.com)

----Original Message----

From: Paul V. Sheridan [pvsheridan@wowway.com]

Received: Friday, 15 Nov 2013, 1:15pm

To: Forsyth, James (WES) [James.Forsyth@MassMail.State.MA.US]

Subject: FW: Jeep Grand Cherokee

Mr. Forsyth:

I just left a voice mail; I would like to schedule a vehicle inspection (photos only) for Monday 25 Nov.

Paul Sheridan Dearborn, MI 313-277-5095

- G. Similar to the death of Remington Walden, once again, the autopsy report for Skyler Anderson does **NOT** list the accident *per se* as the cause of death:
  - 6. The following injuries were sustained by the involved parties during the crash:

Operator #1: No injury.

Operator #2: The cause of death was determined by the Office of the Chief Medical Examiner to be extensive thermal injuries.

Operator #3: No injury.

Passenger #1: No injury.

Passenger #2: No injury.

Passenger #3: No injury.

Passenger #4: She was brought to Mercy Hospital approximately two hours after the crash as a precaution related to her pregnancy.

Seeking to obviate the misguided results rendered against prior offending drivers, where the <u>litigation sequence</u> has (1) criminal first, and <u>then</u> (2) the civil auto product defects lawsuit, defense attorney Joseph Franco retained me in *Commonwealth of Massachusetts versus Joel Cruz*:

- I. I testified for an entire day in the Springfield court.
- It took extensive preparation and personal fortitude to undo the enormous emotional response to the Jeep fire death of young Skyler, an emotion that no reasonable juror would be immune from.
- III. Mr. Franco's direct examination was extraordinarily competent. When complete, it was clear to the Springfield DA that the exculpatory evidence I presented had obviated any chance that the twelve jurors (and two alternates) would sustain his charge of 'Involuntary Manslaughter' regarding the death of Skyler:

|             | COMMONWEALTH OF MASSACHUSETTS |         |         |
|-------------|-------------------------------|---------|---------|
| HAMPDEN, SS |                               | SUPERIO | R COURT |
|             |                               | INDICTM | ENT NO. |
|             | COMMONWEALTH                  | 14      | Same -  |
|             | VS.                           | 200     | W ( 1)  |
|             | JOEL NIEVES-CRUZ              |         |         |

# INDICTMENT INVOLUNTARY MANSLAUGHTER GENERAL LAWS CHAPTER 265, SECTION 13

At the Superior Court, begun and holden at Springfield, within and for the County of Hampden, on the first Tuesday of June 2014. The GRAND JURORS for the Commonwealth of Massachusetts on their oath present that:

#### JOEL NIEVES-CRUZ

defendant herein, of Springfield in the County of Hampden, on or about November 10, 2013 at HAMPDEN COUNTY, did assault and beat Skyler Anderson-Coughlin, and by such assault and beating did kill said Skyler Anderson-Coughlin.

Specifically, that Joel Nieves-Cruz on or about November 10, 2013, having a legal duty of care, did engage in wanton and reckless conduct, and by such conduct did cause the death of Skyler Anderson-Coughlin, in violation of General Laws chapter 265, section 13.

#### Mr. Franco's direct examination concluded as follows:

- Q. Mr. Sheridan, how long have you been examining
  and reviewing the Jeep systems, the fuel systems on the
  Jeep?

  A. Well, as to the field failures, I began analyzing
- A. Well, as to the field failures, I began analyzing
- 16 in 2007. That's when I first officially began doing the
- 17 field failure analysis. My analysis of the Jeep itself
- 18 began in 1987.
- 19 Q. And do you have an opinion to a reasonable
- 20 degree of engineering certainty as to the cause of the
- 21 fire of Mr. Skyler Anderson-Coughlin's Jeep?
- 22 A. Yes. In my opinion the cause of the fire was the
- 23 defective design of the Jeep Grand Cherokee. The rear
- 24 of the Jeep Grand Cherokee that Mr. Anderson was in is
- 25 not crash worthy and it is not road worthy.

### The Springfield DA, Mr. Joseph Forsyth, concluded his cross examination as follows:

- Q. And for -- that rear-end collision is what
- 24 caused that fire on the -- on the -- on the Jeep Grand
- 25 Cherokee contacting the tractor-trailer?
- 1 A. The rear-end collision provoked the defect in the
- 2 Jeep which led to the fire.
- 3 Q. And this happened in 2013?
- 4 A. November 10, 2013.
- 5 Q. Very good, sir.
- 6 MR. FORSYTH: Thank you.

A very important point must be emphasized: Aware that I was scheduled to testify in *Commonwealth of Massachusetts versus Joel Cruz*, Chrysler defense lawyers were present throughout, including the reading of the verdict:

(a) It cannot be overestimated; the legal value that Chrysler product defense lawyers place in Jeep fire death cases, upon the "Guilty" verdicts of their secondary victim, the offending driver. Chrysler must be viewed as a 'vested interest' in these criminal matters, benefiting from and later using the "Guilty" verdict in defense of their defective products. Indeed, this is exactly what they plan to do in White vs. FCA, and exactly what they did in Walden vs. FCA . . . using the hasty plea from criminal defendant Bryan Harrell.

A verdict of "**Not Guilty**" on the charge of 'Involuntary Manslaughter' was rendered by the Springfield jury, as reported in the local news media:

During testimony this week, the defense presented an expert witness who said Anderson-Coughlin and the defendant were both victims of the Jeep's safety defect.

Safety consultant and former Chrysler manager Paul Sheridan testified that the Jeep's fuel tank placement made it vulnerable, and presented photos of gasoline leaking from a Jeep that had been struck from behind.

Following closing arguments, jurors found Nieves Cruz guilty of leaving the scene of a fatal motor vehicle accident, but cleared him of the more serious charge of manslaughter by wanton or reckless conduct.

In an interview Thursday, Sheridan said no judge or jury has found defendants guilty in similar cases after being presented with evidence of the fuel tank defect.

Earlier I promised to tell the reader the reason why a civil product case was never filed in Massachusetts, and why it is MORE INDICATIVE. Indeed, subsequent to the verdict of "Not Guilty" in Cruz, the parties in Anderson vs. FCA settled . . . without even filing a lawsuit! Albeit, under a "confidentiality agreement."

Total time that the offending driver in Massachusetts was incarcerated regarding the charge of 'Involuntary Manslaughter'? Zero.

# THE JEEP FIRE INJURY / DEATH CRISIS: THE INJUSTICE OF THE ONGOING INCARERATION OF MR. BRYAN LAMAR HARRELL

- 22. At the plea hearing of October 14, 2014, wherein Mr. Harrell was charged with the following crimes:
  - A. 'Homicide by Vehicle in the First degree', on the date of March 6, 2012,
  - B. 'Reckless Driving' on the date of March 6, 2012.

Judge A. Wallace Cato repeatedly questioned the validity and legality of a plea of "Guilty." After hearing from Mr. Harrell, detailing the accident of March 6, 2012, and despite having pre-knowledge of the horrific death of Remington, His Honor declares:

| _  |   |
|----|---|
| 7  | THE COURT: So you're telling me it was an accident, |
| 8  | then?   |
| 9  | THE DEFENDANT: Yes, sir, I sure am.                 |
| 10 | THE COURT: That it wasn't homicide by vehicle, it   |
| 11 | was just an accident?                               |
| 12 | THE DEFENDANT: Yes, sir.                            |
| 13 | THE COURT: Okay. It sounds like to me I can't       |
| 14 | accept this plea either if he is not guilty.        |
| 15 | THE DEFENDANT: Sir?                                 |
| 16 | (Discussion off the record between client and       |
| 17 | counsel.)   |

23. I have had extensive contact with the plaintiff attorneys Mr. Jeb Butler and Mr. James E. Butler Jr. They filed the wrongful death case of Walden v Fiat-Chrysler Automobiles (FCA).

In their lawsuit the plaintiffs (correctly) alleged that the true cause of the death of four-year-old Remington Walden was a fuel tank safety defect in the 1999 Jeep Grand Cherokee wherein he was a passenger.

The civil lawsuit was convened in the Superior Court of Decatur County, the same jurisdiction in the criminal matter of State of Georgia versus Mr. Bryan Harrell.

Upon detailed review of the evidence in Walden v FCA, the Bainbridge, Georgia jury was then charged with assessing the percentage of guilt regarding the death of Remington Walden, which resulted from a foreseeable accident of March 6, 2012.

On April 2, 2015, the Bainbridge jury unanimously found as follows:

| 5. | State the percentage of fault of each Defendant (total must equal 100%): |
|----|--|
|    | % Bryan Harrell and  |
|    | 99 % Chrysler Group  |

24. In his closing argument of April 2, 2015, in Walden vs. FCA, plaintiff attorney Mr. Butler stated his **DISSATISFACTION with Mr. Harrell's incarceration**:

11 Chrysler has denied everything and still denies 12 everything and has put up what is, in all candor, a 13 dishonesty defense. Chrysler ought to be in Reidsville instead of Bryan Harrell. 14 15 MR. BELL: Your Honor, I have the same objection and 16 the same motion. 17 THE COURT: Overruled. MR. JIM BUTLER: Ladies and gentlemen, we asked --18 19 we're going to ask that you do full justice for Remi. 20 Bryan and Lindsay are here, and we are here, and we've 21 been working for three years to let people know about this 22 danger. People do not know. Ms. Kelly, sitting right 23 there - where did you - Bertha Walker, that's right, 24 sitting right there where Mr. Jerry Butler is sitting, 25 might have been up one row, see Mr. Butler out there, he 2142

Mr. Butler ostensibly affirmed my earlier points:

- a) FCA benefits from having the criminal case hastily precede the civil case.
- b) As the civil defendant, FCA is a vested interest in the earlier criminal matter of the State of Georgia versus Mr. Bryan Harrell. FCA benefits from a "Guilty" plea.
- c) In this Bainbridge scenario, the exculpatory evidence which confirmed the fire-death safety defect in their Jeep Grand Cherokee, was <u>not</u> entered in the <u>earlier</u> criminal case against Mr. Harrell.
- d) FCA, as a civil defendant, benefited from <u>and used as part of their defense</u>, a prior plea of "Guilty" from the offending driver . . . FCA's secondary victim, criminal defendant Mr. Bryan Harrell.

25. On the first page of this Statement I discuss how prior similar deaths were obscured from the public under provisions of "protective orders," and "confidentiality agreements" entered by FCA. After learning of this ploy, and the deep tragedy that it inflicted upon their lives, Remington's parents signed a 'Request for Clemency', ostensibly declaring that a similar tragedy has afflicted the life of Mr. Harrell. Submitted to the Parole Board members on January 16, 2017, Ms. Lindsay Strickland and Mr. Bryan Walden affirmed as follows:

#### Dear Board Members:

Our son Remington Cole Walden was killed on March 6, 2012 in a wreck in Bainbridge, Georgia. The car in which our son was riding was struck in the rear by a truck driven by Bryan Harrell. The car was a 1999 Jeep Grand Cherokee with a rear-mounted gas tank. Because of the location of the gas tank, the impact caused a gas tank explosion and fire. *That* is what killed our son.

We have always believed and contended that while Mr. Harrell caused the wreck, Chrysler (now "Fiat Chrysler Automobiles" or "FCA") caused our son's death. The gas tank design on that Grand Cherokee was defective and dangerous—and Chrysler knew it. Chrysler's own engineers admitted as much at the trial of our civil case. Mr. Harrell, by contrast, acknowledged his responsibility for the wreck itself from the start.

A jury of twelve Decatur County citizens clearly agreed: at the civil trial, on April 2, 2015 they voted unanimously to apportion 99% of the fault for our son's death to Chrysler, and only 1% of the fault to Mr. Harrell.

We believe Mr. Harrell has been adequately punished, and deserves elemency now. He has a wife and a young child. He was and is filled with remorse; that was obvious both before the civil trial and when he tearfully testified at the trial of our civil case. This tragedy has tormented Mr. Harrell enough. He is punished every day, regardless of whether he is in prison or not.

We would ourselves like closure from this tragic loss. Knowing Mr. Harrell is no longer being punished by the State under these circumstances would be very helpful and meaningful to us both.

We strongly urge that the Board release Mr. Harrell. We urge the Board to do so immediately, rather than waiting until May 17, 2017.

Thank you for your consideration of this request.

Sincerely

Lindsay Strickland & Bryan Walden

### Statement Summary Opinion for Paragraphs 21 through 25

- I. Again, if Remington Walden been a passenger in just about any other brand SUV, the accident would not have been catastrophic, and he would be alive.
- II. I was the first safety expert to contact authorities in the great state of Georgia, including but not limited to the office of District Attorney Joseph K. Mullholland. Other contacts made in the March/April 2012 timeframe included Lieutenant Marc Godby (229-758-3070) and Troop G Secretary Donna Singleton (229-931-2400).
- III. In previous Jeep fire death/injury accidents wherein criminal charges were initially filed against the offending driver, but the prosecutor later became aware of the exculpatory defect evidence, those charges were dropped. In those cases the offending driver was never incarcerated.
- IV. In previous Jeep fire death/injury accidents wherein the prosecutor was aware of the exculpatory defect evidence, criminal charges were never filed. In those cases the offending driver was never incarcerated.
- V. The defect evidence presented in the civil trial of Walden vs. FCA, which was and continues to be exculpatory in *State of Georgia vs. Bryan Lamar Harrell*, resulted in the following jury determination:

But given I thru IV above, in the opinion of the undersigned, this determination is skewed in favor of Chrysler.

VI. In Massachusetts versus Joel Cruz, the jury unanimously found the criminal defendant "Not Guilty" of Involuntary Manslaughter. In terms of the <u>death</u> of Skyler Anderson (pages 20 thru 25 above), the jury unanimously agreed that Skyler would have survived were the Jeep not defective. <u>Paraphrasing</u> the Walden jury form, the Cruz jury in Massachusetts essentially found:

| State the percentage of fault for each defendant in the <i>death</i> of Skyler: |       |  |  |  |  |
|---|-------|--|--|--|--|
| Joel Cruz   | 0 %   |  |  |  |  |
| Chrysler Group  | 100 % |  |  |  |  |

Under Massachusetts law, a person found guilty of <u>leaving the scene</u> can receive a sentence of six to thirty months. Joel Cruz not only left the scene, but he showed no remorse. Mr. Cruz (pictured) received the 30-month sentence on February 26, 2016, but is expected to be released on good behavior:



In stark contrast, as is well-known, the exact opposite occurred with Mr. Harrell. He did not leave the scene, and did everything humanly possible, risking his own life to save young Remington from the Jeep inferno. Mr. Harrell has repeatedly shown remorse (Page 13).

26. In a recent cordial telephone conversation with DA Mullholland he shared his emotional response to the Bainbridge accident scene. He declared: "It was the most horrible thing I have ever seen." I received a very similar response during a recent conversation with a fine member of the Georgia State Police, the accident scene reporting Officer W.R. Landrum.

But, in the criminal matter of State of Georgia versus Bryan Harrell, the troubling dynamic is that humans allow personal emotions to taint their approach to their duties. As professionals we do not have the luxury to react or behave in such a manner. This is not to say that I do not relate to the motivation to exact justice on who/whom we deem guilty of wrong doing, such as defect related Jeep fire-deaths. But we must remain professional.

In my hard-won opinion, the criminal case directed against Mr. Bryan Harrell, <u>in relation to the Jeep fire-death of Remington Walden</u>, is woefully misplaced. On that point, let us again paraphrase the Walden jury form:

State the percentage of fault for decisions to design and engineer an automotive product where the fuel tank is ill-placed, unprotected in foreseeable accidents, vulnerable to breach, and becomes the source of fuel that feeds horrific fire-death of occupants; decisions spanning DECADES:

| Bryan Harrell  | 0 %   |  |
|----------------|-------|--|
| Chrysler Group | 100 % |  |

That 100% connects to corporate individuals that enjoy education at all degree levels. Unlike Mr. Harrell, these individuals have legions of defense lawyers that protect their positions in the event that a safety defect is alleged; positions that involve six, seven and eight-figure incomes (Page 7 above).

Immediately after the \$150,000,000 verdict in Walden vs. FCA I wrote to Georgia Attorney General Samuel Olens requesting a properly placed criminal investigation:

http://pvsheridan.com/Sheridan2Olens-1-29April2015.pdf

- 27. As I stated in paragraph 21, those prior death cases represent a small sampling; there are <u>hundreds</u> more. But I ask the reader's indulgence with the following:
  - a. What is the total time of incarceration, relating to the Jeep fire-injury or fire-death <a href="mailto:portion">portion</a> of the accident, for **ALL** offending drivers in <a href="mailto:hundreds">hundreds</a> of other accidents?

### Total Time of Incarceration for ALL others <u>combined</u>:

10 days

b. What is the total time of incarceration, as of this Statement, for the offending driver, and Chrysler Group secondary victim, Mr. Bryan Harrell:



Total Incarceration for Mr. Bryan Harrell (since plea hearing):

928 days

During this 928 days, the executives described in the boxed item of paragraph 26 have been enjoying their incomes, their family time . . . and now they too enjoy Jeeps that deploy a safe fuel tank design that the undersigned had recommended in 1987.

#### CONCLUSION

- i. There is zero evidence that Bryan Harrell is guilty of a <u>felony</u> charge of 'Homicide by Vehicle in the First degree' but there was **overwhelming exculpatory evidence** that confirms that a Jeep fuel system defect was <u>the true cause</u> of the death of young Remington Walden.
- ii. There is zero evidence that Bryan Harrell is guilty of a <u>felony</u> charge of 'Reckless Driving.' Stupidity? Inattentiveness? Incompetence? Yes. But that misdemeanor behavior is a far-cry from a felony charge. In fact, if the reckless driving charge were sustainable, why was Mr. Harrell <u>not</u> given a formal citation for such, at the scene or at any time thereafter by the Georgia State Police??
- iii. Despite the plethora of accusations and innuendos, especially those shared with Remington Walden's parents, there is zero evidence that Bryan Harrell was DUI on the accident date of March 6, 2012. In truth, Mr. Harrell was not failing to cooperate with law enforcement, refusing their request for a blood sample at the scene; his apparent failure was the result of family legal advice.
- iv. There is zero evidence that plaintiff attorneys Jeb and Jim Butler were satisfied with the incarceration Mr. Bryan Harrell. In truth, civil products liability case history and protocol, and the exculpatory evidence in Walden v FCA clearly affirms the reverse!
- v. There is zero evidence that Remington Walden's parents, Ms. Lindsay Strickland and Mr. Bryan Walden, were fully informed regarding all of the accident facts in relation to the fire-death of their son. Their 'Request for Clemency' letter (page 29 above) makes it clear that they too place the blame for their son's death upon the defective Jeep Grand Cherokee, not Mr. Harrell.

### CONCLUSION - con't

vi. In response to the Honorable Judge J. Kevin Chason ruling on their motion for retrial (denied), FCA defense lawyers have slandered the citizens of Bainbridge, the jury in Walden v FCA, the plaintiff attorneys, and the judge. As if on-cue these FCA defense lawyers have publically declared them "irrational."

As I intimated under oath (page 24 above), <u>what is irrational</u> is the prior FCA practice of selling defective products to an innocent public; products that are not crashworthy and, by minimal modern moral standards, not roadworthy.

As I have intimated throughout this Statement, <u>what is irrational</u> is the deploying by FCA defense lawyers of "protective orders," and "confidentiality agreements," for the explicit purpose of obscuring the truth, and the reality of a safety defect **that puts the public at risk, each and every day.** 

vii. My response to any FCA rebuttal attempts on Point VI, regarding their irrationality, would be to present their testimony, such as pages 7 and 8 above.

I am confident that the executives pictured above (Page 10, paragraph 18) would agree with me. It was those executives that asserted their authority by enacting an alternative design for the Jeep fuel system; a design that I presented in 1987.

### **Personal Observations**

The Walden jury form shown on pages 27 and 30 is skewed in favor of Chrysler.

It is possible, based on the transcript, that had Judge Cato known of the existence of a Jeep fire safety defect, that the Judge would not have accepted the Harrell "Guilty" plea of October 14, 2104 (Page 26, paragraph 22).

It is likely that the reason the Walden jury assessed the 1% fault against Mr. Harrell is because they were compelled by the "evidence" of his prior plea of "Guilty."

The secondary and ongoing victims of FCA's defective Jeep Grand Cherokee are now Mr. Bryan Harrell and his young family (Page 33 above).

#### **ACCOMODATION**

So it is clear, I have not charged and will not accept any monies (except perhaps expense reimbursement) from the Harrell/Small family or any of its agents.

If it serves the good people of Georgia, I am available for any further inputs or inquiry regarding this Statement, and would be honored to appear and be placed under oath.

Statement support documents: <a href="http://pvsheridan.com/sheridan2harrell-statement/">http://pvsheridan.com/sheridan2harrell-statement/</a>

Respectfully,

Jerry J. Petrow TERRY J. PETROVE NOTARY PUBLIC, STATE OF MI

COUNTY OF WAYNE
MY COMMISSION EXPIRES Nov 5, 2019
ACTING IN COUNTY OF 14/10

Paul V. Sheridan

**DDM Consulting** 

22357 Columbia Street

Dearborn, MI 48124-3431

Jane V. Meridan

313-277-5095 / pvs6@Cornell.edu

Attachment

### **PAUL VICTOR SHERIDAN**

22357 Columbia Street
Dearborn, Michigan 48124-3431

Home Office (313) 277-5095 pvsheridan@wowway.com pvs6@Cornell.edu

#### Project Management / Administrative Experience

CHRYSLER CORPORATION, Detroit, Michigan (eleven years)

<u>Vehicle Operations - Project Manager</u>: Product management for Dodge Caravan, Plymouth Voyager and Chrysler Town & Country minivan vehicles.

<u>Jeep and Dodge Truck Engineering - Program Manager</u>: Corporate documentation/communication of engineering issues for Dodge pickup and full-size van vehicles, and Dodge truck engine programs.

FORD MOTOR COMPANY, Dearborn, Michigan. (four years)

<u>Product Planning Analyst</u> - General automotive business planning. Documentation of regulatory compliance status, for Environmental Protection Agency and Department of Transportation.

### **Technical and Engineering Experience**

STATE UNIVERSITY OF NEW YORK, Albany, New York (three years, concurrent with B.S. education)

<u>Nuclear Accelerator Laboratory - Assistant to the Director</u>: Nuclear research facility operations and maintenance. Acted as laboratory 'contact person' for University and private research scientist clients.

SUNYA Computer Center - Assistant to the Director: Computer center operations and client relations.

UNION CARBIDE CORPORATION, Sterling Forrest, New York (one year, post A.S. education)

<u>Nuclear Reactor Operations Trainee</u>: Nuclear reactor operator, nuclear fuel and waste processing, radiation and health physics, radio-pharmaceutical and radio-chemical processing for medical clients.

FAIRWAY TESTING COMPANY, STONY POINT, NEW YORK (three years)

<u>Heavy construction representative</u> for Architect/Engineer. Responsible for reporting of structural steel and concrete specifications compliance. Included jobsite and fabrication plant quality control.

### **Professional Communications and Legal Experience**

AUTOMOTIVE PRODUCT SAFETY SYSTEMS - Self Employed, Dearborn, Michigan, (Current; 22 Years)

General Automotive Management Safety Expert: Provide testimony for injury/death plaintiffs in product liability cases. Preparation of trial evidence and documents. Accident reconstruction and expert reporting services. Expertise featured on ABC News 20/20, Wall Street Journal, ABC News Primetime, Detroit News, et al.

AMERICAN TELEVISION AND COMMUNICATIONS CORPORATION - Albany, New York / Ithaca, New York

<u>Sales Manager</u>: Cable television sales management for up to 30,000 accounts. Extensive sales staff management and customer satisfaction issues experience. Included extensive interaction with cable system engineer and installation crews (one year, 1978/9, concurrent with Cornell MBA education).

#### Formal Education

CORNELL UNIVERSITY-JOHNSON GRADUATE SCHOOL OF MANAGEMENT, Ithaca, New York. May 1980. Master of Business Administration: General Management and Business Logistics.

STATE UNIVERSITY OF NEW YORK AT ALBANY, Albany, New York. June 1978.

Bachelor of Science: Mathematics and Physics, minor in Computer Science.

ORANGE COUNTY COMMUNITY COLLEGE, Middletown, New York. June 1974.

Associate of Science: Physical Sciences, minor in Building Construction Technology.

HENRY FORD COMMUNITY COLLEGE, Dearborn, Michigan, May 2010.

<u>Associate of Arts</u>: Concentration in mathematics, computer hardware & software. Includes Microsoft 'Computer Software Applications' Certification (May 2009).

Apr 27 2017 05:00PM Krevolin Horst 4048889577

Zahra S. Kerinehak

page 2



Direct Dial: (404) 888-9922: kntinshakta)khlavetirin oom

Athi: (Paralegal)

April 27, 2017

Sent via facsimile 229-248-3850

Ms. Kim Brown Records

Re:

Bryan Lamar Harrell Dob: 09/23/1985

Gdc # 1001008812

Dear Ms. Brown:

I would like to request the booking record for October 2012 for Bryan Lamar Harrell. You can either fax (404) 888-9700 or email them to me at karinshak/@ikhlawfirm.com.

If you have any questions, or need any other information, please let me know.

Sincerely,

Krevolin & Horsi, ELC
Jahra S. Karinihak / winkers

ZSK/dlm

Agency ID (ORI) GA0430000

### HISTORY ARREST/BOOKING REPORT Booking Date: 05/01/2012

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Time: 1145

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|--------------|--|---|---|---|
| ı            | Inmate #:   9413   |   |   | Friday April 28 2017 9:44 AM Page 1                   |
|              | DEFENDANT NAME (LAST, FIRST, M<br>HARRELL, BRYAN LAMAR   | IIDDLE)   | RACE SEX DATE OF BIRTH                                      | PLACE OF BIRTH<br>GEORGIA                             |
| i            | · STATEMENT OF THE PROPERTY OF | AGE AT BOOKING HEIG<br>CURRENT AGE 600  | HT WEIGHT HAIR EYES INS NO                                  | SOCIAL SECURITY #                                     |
| 4            |  | VISIBLE SCARS AND MARKS:<br>CORBYN 10-23-12" TT RT ARN<br>ADDRESS<br>700 SCHOOL COURT * BAINBRI | M, HEART TT STOM:   "INFO WITHHELD"                         | F8I NUMBER INFO WITHHELD ** PHONE NUMBER 229-254-9520 |
| PERSONAL DAT |  | ALIAS<br>LAST KNOWN EMPLOYER<br>UNEMPLOYED  | DRIVERS LICENSI<br>051385317                                | E NUMBER STATE GA                                     |
| 9            | PHOTOID: 62484 :   | GANG INVOLVED? GAN  | G NAME  |   |
|              | ARRESTING AGENCY<br>DESO - DECATUR COUNTY SO   |   | ARRESTING OFFICER FRANK GREEN                               | 101   |
|              | BOOKING OFFICER<br>S. MCGREGOR   | SEARCHED BY<br>G. ANDERSON  | FINGERPRINTED BY S. MCGREGOR                                |   |
|              | ATTORNEY   |   | OCA OTN<br>12060038 "INFO W                                 | ЙТННÉLÖ **`   |
| :            | ATTORNEY E-MAIL  |   | ATTORNEY PHONE # ATTORNEY FAX #                             |   |
|              |  | ATION<br>PRING CREEK ROAD   | Do you want to consult with y                               | our consulate?  |
| RELEASE      | DATE TIME RELEA:<br>05/01/2012   1326   BONDE  | SE TYPE RELEASING O   |   | TIME SERVED 0 (days)                                  |
| <b>X</b>     |  | UCR TYPE CASE#<br>7399 FELONY 12050001  | OFFENSE DATE CNT STATUTE UC                                 | R TYPE CASE#<br>99 FELONY 12050001                    |
| ، ن          | CHARGE<br>USE OF COMMUNICATION FACILITY<br>POSSESSION OF DRUGS   | WARRANT# 12F1051<br>IN PURCHASING OF CCH Code   | CHARGE USE OF COMMUNICATION FACILITY IN POSSESSION OF DRUGS | WARRANT# 12F1062<br>PURCHASING OF CCH Code            |
| NOL          | AT/NEAR OFFENSE  | ARREST  | AT/NEAR OFFENSE   | ARREST  |
| O.           | N STATE  | COUNTY  | STATE   | GOUNTY  |
| GNO8         | TYPE COMPANY OTHER BOND MANAGEME   | AMOUNT<br>S5,950  | TYPE COMPANY OTHER BOND MANAGEMEN                           | AMOUNT<br>T \$5,950                                   |
| NO           | DATE SENTENCE  |   | DATE SENTENCE<br>5  |   |
| DISPOSITION  | COURT DATE<br>09/04/2012<br>COURT  |   | COURT DATE 09/04/2012 COURT                                 |   |

DECATUR COUNTY 5 0

PAGE 03

Agency ID (ORI) GA0430000

### HISTORY ARREST/BOOKING REPORT

Booking Date: 05/01/2012

Time: 1145

Friday April 28 2017 9:44 AM

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Page 2

Inmate #: 9413 OFFENSE DATE CNT STATUTE UCR TYPE CASE#

1 12/06/2011 | 1 | 16-13-32 | 7399 | FELONY | 12050001

CHARGE WARRANT# | 12F1063 OFFENSE DATE ONT STATUTE UCR TYPE 7399 FELONY 12050001 B 12/09/2011 1 16-13-32 7399 FELONY 12050001 CHARGE WARRANT# 12F1064 CHARGE USE OF COMMUNICATION FACILITY IN PURCHASING OF CCH Code USE OF COMMUNICATION FACILITY IN PURCHASING OF CCH Code POSSESSION OF DRUGS POSSESSION OF DRUGS AT/NEAR OFFENSE
N STATE ARREST COUNTY AT/NEAR OFFENSE ARREST N STATE COMPANY COMPANY TYPE COMPANY AMOUNT
OTHER BOND MANAGEMENT \$6,950

DATE SENTENCE

COURT DATE
09/04/2012 BOND MANAGEMENT : \$5.950 TYPE OTHER DATE SENTENCE COURT DATE 09/04/2012 COURT | | | | | COURT Superior | | OFFENSE DATE CNT STATUTE UCR TYPE OFFENSE DATE CNT STATUTE UCR CASE# 12/09/2011 1 16-13-30 3532 FELONY 12050001
CHARGE WARRANT# 12F1065
POSSESSION OF COCAINE CCH C 12/09/2011 1 16-13-30 3562 MISD. 12050001 CHARGE WARRANT# .12M32664
POSSESSION OF MARIJUANA CCH CC E CHARGE CCH Code ATINEAR OFFENSE ARREST
N STATE COUNTY AT/NEAR OFFENSE ARREST

N STATE COUNTY COMPANY .. TYPE COMPANY AMOUNT
OTHER BOND MANAGEMENT \$11,700

DATE SENTENCE TYPE COMPANY AMOUNT
OTHER BOND MANAGEMENT \$1,350

DATE SENTENCE SENTENCE DISPOSITION COURT DATE COURT DATE 09/04/2012 09/04/2012 COURT Suporior L COURT Superior

Agency ID (ORI) GA0430000

### HISTORY ARREST/BOOKING REPORT

Booking Date: 09/10/2014 Time: 1445

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| nmate #: 9413                        |                        | Page 1                    |
| DEFENDANT NAME (LAST, FIRST, MIDDLE) | RACE SEX DATE OF BIRTH | PLACE OF BIRTH            |

|              | Inmate #: 9413   |  |           |  |                      | 134                           | day April 28 201   | 7 9:51 AM<br>Page 1        |
|--------------|--|--|-----------|--|----------------------|-------------------------------|--|----------------------------|
|              | DEFENDANT NAME (LAST, FIRST, M. HARRELL, BRYAN LAMAR                         | AIDDLE)  |           | RACE<br>W  | SEX DATE             | OF BIRTH                      | PLACE OF   | BIRTH                      |
| *            |  |  | RM, HEART | HT HAIR<br>BRO<br>TOSTOM   | EYES<br>BRO<br>SID N | INS NO.  IUMBER  ITHHELD ** : | SOCIAL SE<br>"INFO WIT<br>FBI NU<br>"INFO WIT<br>PHONE N | HHELD ** HHELD ** HHELD ** |
| PERSONAL DAT | SHOTOID: COOP  | LAST KNOWN EMPLOYER<br>UNEMPLOYED                                |           |  | DRIVER<br>0513853    |                               | UMBER  | STATE<br>GA                |
|              | PHOTOID: 66620  ARRESTING AGENCY DESO - DECATUR COUNTY SO                    | GANG INVOLVED?   | NG NAME   |  | ARRESTING<br>D. MOCK | OFFICER                       |  | # SO42                     |
|              | BOOKING OFFICER S. MCGREGOR ATTORNEY   | SEARCHED BY<br>R. HENDERSON                                      | OCA       | FINGERI<br>S. MCGR   | PRINTED BY<br>REGOR  | OTN                           |  |                            |
|              | ATTORNEY E-MAIL  |  | 12060     |  | E#ATTORNI            | ** INFO WITH                  | HELD **  |                            |
| EASE         | 09/10/2014 1445 DEC/<br>HOU  | SE TYPE RELEASING  | 1 1 11    | RI   | ou want to con       | nsult with your               | 21   | SERVED                     |
| CTAIN CE     | OFFENSE DATE CNT STATUTE   | UCR TYPE CASE#<br>7399   FELONY   12050001<br>WARRANT# 12-CR-098 | OFFE      | NSE DATE C<br>29/2011  | NT STATU<br>1 16-13- | TE UCR<br>32 7399             | TYPE C/<br>FELONY 121<br>/ARRANT# 12-                    |                            |
|              | AT/NEAR OFFENSE  | ARREST   | 100       | AT/NEAR<br>N   | OFFEN<br>CIT         |                               | ARREST   |                            |
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## GA0430000 HISTORY ARREST/BOOKING REPORT

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| Inmate #: . 9413  | Friday April 28 2017 9:51 AM<br>Page 2   |
| OFFENSE DATE CAT STATUTE UCR TYPE CASE#  11/29/2011 1 16-13-32 7399 FELONY 12050001  CHARGE WARRANT# 12-CR-098  JILLEGAL USE OF COMMUNICATION FACILITY (RT CRT.) CCH Code | OFFENSE DATE CNT STATUTE UCR 1YPE CASE#  17/29/2011 1 16-13-28 3584 FELONY 12050001  CHARGE WARRANT# 12-CR-098  POSSESSION OF MARIJUANA LESS THAN 1 OZ(RT CRT CCH Code   |
| ATINEAR OFFENSE ARREST CITY CITY  | AT/NEAR OFFENSE ARREST   |
| DATE SENTENCE  O9/10/2014   NOLLE PROSEQUI  O9/10/2014   COURT DATE COURT Superior   Superior   | DATE SENTENCE  O9/10/2014 NOLLE PROSEQUI  COURT DATE O9/10/2014 COURT Superior   |
| OFFENSE DATE CNT STATUTE UCR TYPE CASE#  11/29/2011 1 16-13-30 3533 FELONY 12050001  CHARGE WARRANT# 12-CR-098  POSS ESSION OF COCAINE(RT.CRT.) CCH Code                  | OFFENSE DATE CNT STATUTE UCR TYPE CASE#  11/29/2011 1 16-13-32 7399 FELONY 12050001  CHARGE WARRANT# 12-CR-098  ILLEGAL USE OF COMMUNICATION FACILITY (RT.CRT.) CCH Code |
| ATINEAR OFFENSE ARREST  | AT/NEAR OFFENSE ARREST   |
| DATE SENTENCE  5 09/10/2014   3 YRS STATE SYTEM  COURT DATE 09/10/2014   COURT SUPPRIOR   | DATE SENTENCE 09/10/2014 : NOLLE PROSEQUI COURT DATE 09/10/2014 COURT Superior.  |

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Agency ID (ORI) GA0430000

### **HISTORY ARREST/BOOKING REPORT**

Booking Date: 05/25/2012

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|               | Inmate #: 9413   |   | Friday April 28 2017 9:46 AM<br>Page 1 |
|               | a manufacture of the control of the  | RACE SEX DATE OF BIRTH                  | ,                                      |
|               | DEFENDANT NAME (LAST, FIRST, MIDDLE) HARRELL, BRYAN LAMAR  | W M                                     | GEORGIA                                |
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|               | CURRENT AGE  | . 600 180 BRO BRO                       | "INFO WITHHELD "                       |
|               | VISIBLE SCARS AND MA<br>PCORBYN 10-23-12* TT F   | ARKS:                                   | FBI NUMBER * INFO WITHHELD **          |
|               | ADDRESS 700 SCHOOL COURT - B   | ·                                       | PHONE NUMBER                           |
| TA.           |  | AINBRIDGE, GA 39817  ORIVERS LICENSE    | 229-254-9520<br>NUMBERSTATE            |
| 1 2           | ALIAN  | 061386317                               | GA GA                                  |
| PERSONAL DATA | LAST KNOWN EMPLOYED  | ER                                      |  |
| ě.            | PROTOID: 62868 GANG INVOLVED?  | GANG NAME                               |  |
|               | ARRESTING AGENCY   | ARRESTING OFFICER                       |  |
|               | GSP - GA STATE PATROL  | TFC LANDRUM                             | 306                                    |
|               | BOOKING OFFICER SEARCHED BY D. THOMPSON M. OWENS   | FINGERPRINTED BY<br>D. THOMPSON         |  |
| •             | ATTORNEY   | OCA OTN                                 |  |
|               | 100 Maril 1981 1981  | 12060038 INFO W                         | THHELO "                               |
|               | ATTORNEY E-MAIL  | ATTORNEY PHONE # ATTORNEY FAX #         |  |
|               | COLUMN TO THE TAXABLE PARTY OF TAXAB | J <sup>*</sup>                          |  |
|               | ARREST DATE TIME LOCATION  05/24/2012 1700 UAIL LOBBY  | Do you want to consult with yo          | our consulate?                         |
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| CASI          | DATE TIME RELEASE TYPE RELEASE TYPE RELEASE OF 121/2012 1859 BONDED OUT S. LAST  | SING OFFICER REMARKS ER BOND MANAGEMENT | TIME SERVED                            |
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| ١.,           | :OFFENSE DATE CNT STATUTE UCR TYPE CASE# 03/06/2012 1 1 16-5-60 7399 MISD. 1205008   | OFFENSE DATE CNT STATUTE UC             |  |
| CHARC         | 03/06/2012 1 16-5-60 7399 MISD 1205006<br>CHARGE WARRANT# T-E0073  | Transferred Barner 9                    | WARRANT# T-E00736187                   |
| Ċ             | RECKLESS CONDUCT (MISDEMEANOR)   | Code FOLLOWING TO CLOSELY               | CCH Code                               |
|               |  | n 4                                     |  |
| NO.           | AT/NEAR OFFENSE ARREST   | AT/NEAR OFFENSE                         | ARREST                                 |
| LOCATION      | N STATE STATE  | AT/NEAR OFFENSE                         | STATE                                  |
| 1             | TVOE COMPANY AMOUNT  | 7.05                                    | AMOUNT                                 |
| BOND          | PROPERTY BOND MANAGEMENT \$1,350   | THER BOND MANAGEMEN                     | -                                      |
|               | DATE SENTENCE  | DATE SENTENCE                           | · ·                                    |
| TON           | ACHET DATE   | S COURT DATE                            |  |
| DISPOSITION   | COURT DATE :   | 5 COURT DATE<br>09/04/2012              |  |
| ă             | COURT Superior   | G COURT<br>Superior                     |  |
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Agency ID (ORI) GA0430000

### HISTORY ARREST/BOOKING REPORT

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Booking Date: 05/25/2012

Time: 0028

Friday April 28 2017 9:45 AM

Page 3

Inmate #: 9413

OFFENSE DATE CNT STATUTE UCR TYPE CASE#
03/05/2012 1 40-6-391 0999 MISD. 12050081

CHARGE WARRANT# T-E00712952

DRIVING UNDER INFLUENCE ALCOHOL CCH Code

AT/NEAR OFFENSE ARREST
N STATE STATE

TYPE COMPANY AMOUNT
OTHER BOND MANAGEMENT \$1,400

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Agency ID (ORI) GA0430000

### HISTORY ARREST/BOOKING REPORT

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Inmate #: 9413

Friday April 28 2017 9 46 AM Page 2

| OFFENSE DATE CNT STATUTE UCR TYPE CASE#   | OFFENSE DATE CNT STATUTE UCR TYPE CASE# 11/29/2011 1 16-13-32 7399 1 FELONY 12050001   |
|---|--|
| E CHARGE WARRANT# 12F1061   | CHARGE WARRANT# 12F1062  |
| USE OF COMMUNICATION FACILITY IN PURCHASING OF CCH Code                           | USE OF COMMUNICATION FACILITY IN PURCHASING OF CCH Code  |
| POSS.OF DRUGS(BND SURRENDE  | POSS, OF DRUGS (BND SURRENDE   |
| Z ADDERY  | Z  |
| AT/NEAR OFFENSE ARREST  | E AT/NEAR OFFENSE ARREST N STATE COUNTY  |
| Since State   | OF N STATE COUNTY  |
| TYPE COMPANY AMOUNT   | TYPE COMPANY AMOUNT  |
| g: OTHER BOND MANAGEMENT \$5.950  | PROPERTY BOND MANAGEMENT \$5,959   |
| DATE SENTENCE   | DATE SENTENCE  |
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| 요. 09/04/2012 )   | \\ \text{\frac{1}{2}} \\ \text{\tin}\text{\tint{\text{\tint{\text{\tetx{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\tin}\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\text{\texi}\text{\tex{\text{\texit{\text{\text{\texi}\tint{\text{\texi}\text{\texit{\tin}\tint{\text{\text{\text{\texi}\text{\texit{\text{\text{       |
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| 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1   | . N  |
| SCHARGE WARRANT# 12F 1063 USE OF COMMUNICATION FACILITY IN PURCHASING OF GCH Code | S CHARGE WARRANT# 12F1064 USE OF COMMUNICATION FACILITY IN PURCHASING OF CCH Code  |
| POSS.OF DRUGS(BND SURRENDE  | POSS.OF DRUGS(BND SURRENDE   |
|   | the state of the s |
| ATINEAR OFFENSE ARREST  | g AT/NEAR OFFENSE ARREST STATE COUNTY  |
| N STATE COUNTY  | N STATE COUNTY   |
| TYPE COMPANY AMOUNT   | 7/07 001001/4  |
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| 물 09/04/2012 : i<br>COURT   | © 09/04/2012   COURT .   |
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| OFFENSE DATE CNT STATUTE UCR TYPE CASEN   | OFFENSE DATE CHT STATUTE UCR TYPE CASEN  |
| 06/13/2012 1 7399 FELONY 12060038   | 벨 03/12/2012 1 40-6-393 0999 FELONY 12050081   |
| E CHARGE WARRANT# 12F1149   | CHARGE WARRANT# 12F1119  |
| TEMS PROHIBITED FOR POSSESSION BY INMAT CCH, Code                                 | HOMICIDE BY VEHICLE CCH Code   |
|   |  |
| E ATINEAR OFFENSE ARREST  | 를 AT/NEAR OFFENSE ARREST   |
| STATE COUNTY  | AT/NEAR OFFENSE ARREST STATE STATE   |
| ¥   | <u>S</u>   |
| TYPE COMPANY AMOUNT S11,700   | TYPE COMPANY AMOUNT  |
|   | OTHER BOND MANAGEMENT S11,700  |
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Agency ID (ORI) GA0430000

### HISTORY ARREST/BOOKING REPORT Booking Date: 02/12/2013

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|           | Inmate #: 9          | 413                             |                          |                             |                   |                       |                     |                   |              | Page 1                   |
|           | DEFENDANT N          | IAME (LAST, FIRST.<br>YAN LAMAR | WIDDLE)                  |                             | į                 | RACE S                | EX DATE (           | OF BIRTH          | 1            | ÖF BIRTH<br>EORGIA       |
|           | ENGERHORING HEAVY    |                                 | AGE AT BOOKING           | HEIG                        | HT WEIGH          |                       | EYES                | INS NO.           | SOCIA        | L SECURITY #             |
|           | The second second    |                                 | CURRENT AGE              | 600                         | 180               | , BRO .               | BRO                 |                   | - INFO       | WITHHELD **              |
|           |                      | Hiji                            | VISIBLE SCAR             | SAND MARKS.<br>112" TTRTARN | N: HEART T        | т втом:               | SID NI<br>MFO WIT   | MBER<br>THHELD ** | ** INFO      | NUMBER<br>WITHHELD **    |
|           |                      | 344                             | ADDRESS.<br>700 SCHOOL C | OURT BAINBR                 | IDGE, GA 3        | 9817                  |                     |                   | 229          | NE NUMBER .<br>-254-9520 |
| AL DATA   |                      |                                 | ALIAS                    |                             |                   |                       | DRIVERS<br>05138531 | LICENSE NO        | (e           | STATE                    |
| PERSCNAL. |                      |                                 | LAST KNOWN               | EMPLOYER<br>                |                   |                       |                     |                   |              |                          |
|           |                      | 63912                           | GANG INVOLVE             | D? GAN                      | IG NAME           |                       |                     |                   |              |                          |
|           | DESO - DECAT         | GENCY<br>UR COUNTY SO           | 9 99 6 1 60              | 414                         |                   | . AF                  | RESTING C           | RT ROOM           |              | #                        |
|           | BOOKING OFF          | ICER                            | SEARCHED<br>BRADLEY      |                             |                   | FINGERPR<br>M. TOMLIN |                     |                   | -11          |                          |
|           | ATTORNEY             | * Francis + 196 - + 4 1         |                          |                             | OCA<br>: [1206003 | 8                     |                     | OTN<br>"ÍNFÓ WITH | HELD **      |                          |
|           | ATTORNEY E-M         | MAIL                            | -:                       |                             | •                 | EY PHONE              |                     | •                 |              |                          |
|           |                      |                                 |                          | • •                         |                   |                       | i                   |                   |              |                          |
| į         | 02/12/2013           |                                 | COURT ROOM               |                             |                   | Do you                | want to cons        | sult with your    |              |                          |
| RELEASE   | DATE<br>02/26/2013   | TIME RELEA                      | ISE TYPE                 | RELEASING O                 | OFFICER           | REN                   | ARKS                |                   |              | IME SERVED<br>14 (days)  |
|           | OFFENSE DATE         | ONT STATUTE                     | UCR TYPE                 | CASE#                       |                   | ., .,                 |                     |                   |              |                          |
| 2         | 06/13/2012<br>CHARGE | 1 !                             | 7399 FELONY              |                             |                   |                       |                     |                   |              |                          |
| 苔:        | CHARGE               | TÉD FOR POSSESSI                | WARRANT#                 | 12F1149                     |                   |                       |                     |                   |              |                          |
|           | CRŢ)                 | TED FOR PUSSESSI                | ON BY INWATE (           | KII COH Code                |                   |                       |                     |                   |              |                          |
| LOCATION  | AT/NEAR              | OFFENSE                         | ARRE COUN                |                             |                   |                       |                     |                   |              |                          |
|           |                      | . es à                          |                          |                             |                   |                       |                     |                   |              |                          |

Agency ID (ORI) GA0430000

Inmate #: 9413

### HISTORY ARREST/BOOKING REPORT

Booking Date: 10/09/2014

PUBLIC COPY

Time: 1435

Friday April 28 2017 9 53 AM

| DEFENDANT | NAME ( | AST, | FIRST, | MIDDL | .E) |   |
|-----------|--------|------|--------|-------|-----|---|
| HARRELL.  | RYAN L |      |        |       |     |   |
|           | -      |      |        | AGE   | ΑT  | В |

RACE SEX DATE OF BIRTH
W M AGE AT BOOKING | HEIGHT WEIGHT HAIR EYES INS NO.

CURRENT AGE | 600 | 180 | BRO | BRO

GEORGIA SOCIAL SECURITY # \*\* INFO WITHHELD \*\*

PLACE OF BIRTH

VISIBLE SCARS AND MARKS; CORBYN 10-23-12" TT RT ARM; HEART TT STOM

LAST KNOWN EMPLOYER

SID NUMBER. 

... FBI NUMBER

ADDRESS ADDRESS, 700 SCHOOL COURT \* BAINBRIDGE, GA 39817

GANG INVOLVED? ...; GANG NAME [

PHONE NUMBER 229-254-9520

ALIAS

DRIVERS LICENSE NUMBER 051385317

\_\_\_STATE

PHOTOID: 66777

ARRESTING AGENCY DESO - DECATUR COUNTY SO

BOOKING OFFICER S. LASTER

PERSONAL

S LASTER

ARRESTING OFFICER J. PACE

SEARCHED BY

UNEMPLOYED

S. LASTER

FINGERPRINTED BY

10/14/2014 COURT Superior

12060038 TINFO WITHHELD \*\*

ATTORNEY PHONE # ATTORNEY FAX #

10/14/2014 COURT

ARREST DATE TIME LOCATION
10/09/2014 1320 MITCHELL COUNTY
CORRECTIONAL INSTI

Do you want to consult with your consulate?

DATE TIME RELEASE TYPE

ATTORNEY E-MAIL

RELEASING OFFICER

REMARKS COURT

TIME SERVED 7 (days)

OFFENSE DATE CNT STATUTE UCR TYPE CASE# 병 05/20/2014 1 40-6-393 0909 FELONY 12060038 CHARGE WARRANT# HOMICIDE BY VEHICLE IN THE FIRST DEGREE (CPO) WARRANT# 14-CR-00168 CCH Code LOCATION ARREST AT/NEAR

CITY COUNTY DATE SENTENCE
10/(4/2014 15 YRS CONCURRENT WITH ANY SENTENCE
COURT DATE NOW SERVING.

OFFENSE DATE ONT STATUTE 8 06/20/2014 1 40-6-391A 5403 FELONY 12060038 CHARGE WARRANT# 14-CR-001 WARRANT# 14-CR-00168 ·DRIVING UNDER INFLUENCE DRUGS (CPO) ARREST AT/NEAR OFFENSE ' N CITY COUNTY SENTENCE COURT DATE

# Agency ID (ORI) GA0430000 HISTORY ARREST/BOOKING REPORT

Booking Date: 10/09/2014

Time: 1435

Friday April 28 2017 9:53 AM

Inmate #: 9413

PUBLIC COPY

Page 2

| OFFENSE DATE CNT STATUTE UCR TYPE CASE#  9 05/20/2014 1 40-6-391A 5403 FELONY 12060038  CHARGE WARRANT# 12060038  DRIVING UNDER INFLUENCE DRUGS (CPO) CCH Code | OFFENSE DATE CNT STATUTE UCR TYPE CASE#  06/20/2014   1   40-5-393   0909   FELONY   12060038  CHARGE WARRANT#   14-CR-00168  HOMICIDE BY VEHICLE IN THE FIRST DEGREE (CPO) CCH Code |
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| AT/NEAR OFFENSE ARREST COUNTY  | AT/NEAR OFFENSE ARREST OFFENSE ARREST CITY COUNTY  |
| DATE SENTENCE  COURT DATE  10/14/2014  COURT  Superior   | DATE SENTENCE  COURT DATE 10/14/2014 COURT Superior  |

Agency ID (ORI) GA0430000

### HISTORY ARREST/BOOKING REPORT Booking Date: 06/04/2013

PUBLIC COPY

Time: 0942 Friday April 28 2017 9:46 AM Inmate #: 9413 RACE SEX DATE OF BIRTH PLACE OF BIRTH GEORGIA DEFENDANT NAME (LAST, FIRST, MIDDLE) : , HARRELL, BRYAN LAMAR AGE AT BOOKING HEIGHT WEIGHT HAIR EYES INS NO. SOCIAL SECURITY #

CURRENT AGE 600 180 BRO BRO 100 INFO WITHHELD 100 INFO VISIBLE SCARS AND MARKS: SID NUMBER FB) NUMBER CORBYN 10-23-12" TT RT ARM, HEART TT STOM: "INFO WITHHELD " INFO WITHHELD " PHONE NUMBER 229-254-9520 ADDRESS
700 SCHOOL COURT \* BAINBRIDGE, GA 39817

ALIAS DRIVERS LICENSE NUMBER STATE OS1385317

STATE GA PERSONAL DATA UNEMPLOYED PHOTOID: 84389 GANG INVOLVED? GANG NAME GANG INVOLVED.

ARRESTING OFFICE,

SGT D BRYANT/DCCI ARRESTING OFFICER ARRESTING AGENCY DESO - DECATUR COUNTY SO BOOKING OFFICER SEARCHED BY FINGERPRINTED BY S WATSON D. THOMPSON D. THOMPSON ATTORNEY

OCA

COURT

\*\* INFO WITHHELD \*\* : 12060038 ATTORNEY PHONE # ATTORNEY FAX # ATTORNEY E-MAIL 

ARREST DATE TIME LOCATION
06/04/2013 0913 OCCI Do you want to consult with your consulate? TIME SERVED DATE TIME RELEASE TYPE RELEASING OFFICER
B 06/04/2013 1057 TRANSFER M. TOMLIN 0 . (days)

OFFENSE DATE CNT STATUTE UCR TYPE CASE# 05/30/2013 1 18-12-83 7399 FELONY 13050005722 CHARGE WARRANT# 13F10140
PROVIDING CONTRABAND TO INMATE CCH.C. CCH Code ARREST AT/NEAR OFFENSE COUNTY COUNTY 80N0 SENTENCE 02/10/2014 2 YRS PROBATION FINE OF 1000.00 DISPOSITION COURT DATE 09/03/2013 COURT Superior

May 3, 2017

State Board of Pardons and Paroles 2 Martin Luther King, Jr. Drive SE Suite 458, Balcony Level, East Tower Atlanta, Georgia 30334-4909

Dear Parole Board Member:

My name is Bryan Harrell and I am currently incarcerated at Georgia State Prison. I am 32 years old.

I am writing this support letter in the hopes of being accepted for Parole. I have been incarcerated for almost three years.

I have learned since being incarcerated what brought me to this place and that is some of the bad choices I have made. On March 6, 2012 I was involved in a terrible car accident that took the life of an innocent child. I would give anything to go back and change the outcome of that day. This is something I'm going to live with for the rest of my life. I ask God all the time why didn't he take me instead. I would gladly give my life if it meant to bring Remington back. From day one I accepted full responsibility and I plead guilty in October 2014 to vehicular homicide and reckless driving, I did the right thing. Several months later I found out the jeep had a gas tank defect and that was the true actual cause of Remi's death. I caused the accident but according to the experts Remi would have only suffered a bone fracture in his leg that day, he would still be alive.

Since incarceration I have realized the most important things in life and that is family, my son and my fiancé. I want more than anything to be there for them, to support them and give them the life that they both deserve. They need me. I want to prove that I am a changed man and that I can make the right choices when I am released from prison. I will work hard to provide for my family and stay away from people and things that would cause trouble. I will attend Celebrate Recovery every week and help mentor others who are going down the wrong path. I will avoid coming back to prison.

I ask that you please consider me for parole so I can go home to my family and give them the life that they both deserve. Especially be a father to my little boy and guide him down the right path so he never ends up in prison.

Thank you and God Bless

Bryan L. Harrell

State Board of Pardons and Paroles 2 Martin Luther King, Jr. Drive SE Suite 458, Balcony Level, East Tower Atlanta, Georgia 30334-4909

Dear Parole Board Member:

My name is Christina Small and I am 29 years old. I graduated high school in 2006 in Bainbridge, Ga. I'm currently working full time as a receptionist at Patients First in Tallahassee, FI. where I have been employed for the last 6 months. Before employment with Patients First I worked as a waitress from the age of 16 to 27 years old.

Lam writing this letter in support of my fiancé Bryan Harrell, whom is also the father of my beautiful little boy Corbyn Harrell, we love him more than life itself. Bryan and I have been together for over 5 years. Not long into our relationship I realized how misdirected Bryan really was but I also knew that God put us together for a reason and that without a doubt I was going to love him more than life. Together God had a purpose for us and his purpose is our Testimony. Not long after we got together and we found out I was pregnant Bryan was involved in a terrible car accident on March 6, 2012 which took the life of an innocent child, I could feel my world was coming to an end. We get to have our child but this family doesn't get to have theirs, how is this fair? This question and that day replayed over and over in our minds and still does to this day. Bryan has to live with this daily and it is going to continue to weigh heavy on his heart for the rest of his life whether he is in prison or not. There is not a day that goes by that Bryan doesn't wish he could go back to that day and change the outcome. Bryan has told me on numerous occasions that he wished God would have took him instead of Remi and that he would give his life up if it meant Remi could come back. The guilt continuously eats at him. At the time of the accident no one was aware the jeep had a defective gas tank located 11 ½ inches away from the back bumper that resulted in a 2.2 million recall and was the actual true cause of the death of Remington Walden, Bryan admitted fault for the accident and accepted full responsibility from day one. In October of 2014 Bryan plead guilty to vehicular homicide and reckless driving, because in his heart he felt somewhat at fault for the death of Remi. Bryan did what any good hearted person would do, he did the right thing. A few months after pleading guilty, the trial for Walden v. Chrysler started. Little did we know what ended up being a tragic accident should have only been the result of a bone fracture, Remi should have walked away alive that day. The jury found Chrysler 99% responsible for the death of Remi and Bryan only 1% for causing the wreck.

Since Bryan has been incarcerated I have noticed a big change in his outlook on life. My son and I have seen this change in him through our visits and phone calls with Bryan. I have personally witnessed Bryan transform into a more well-rounded and responsible adult. I believe since incarceration Bryan has been working very hard to make mature level headed decisions and has been improving his life so he can come home and be the great husband and father that God created him to be. Bryan is so positive about his future as well as ours and what he wants to do with his life. I know with every ounce of me that Bryan is a great man and I hope that he can get the opportunity to prove that.

I love Bryan very much and I can assure you that if he is granted parole, he has my support on a daily basis. I truly believe that Bryan has changed for the better. Bryan has committed to attending Celebrate Recovery weekly, and I vow to attend with him. Bryan has told me if he can help save at least one live then he has done his job. I will be there to help guide him on making the right decisions and do everything I possibly can to make sure he stays on the right path. Bryan was running his own roofing business before incarceration and my father has an extra truck that he is giving Bryan upon release so he can have a way to get back and forth to his jobs every day and provide for his family. Our son and I live in an apartment which Bryan will be joining us in once he is released. Most importantly our son Corbyn needs his daddy home. Corbyn is the one who has truly been affected by this. His heart Is so hurt without his father and he does not understand why. At night when he prays his prayer is always "please bring my daddy home" as a mother my heart breaks for him. Corbyn will be five years old in October and it would mean so much to us to have his daddy home for his birthday. Corbyn is at a very delicate age now and needs his dad home to give him the guidance and support every child needs. We would all be so very grateful to have our family back together so we can move on from this terrible nightmare and start a new journey together

If parole is granted, Bryan is supported by our son, our families, friends, the community and of course myself. We will all give him the emotional support he needs to avoid a negative lifestyle. Please give him the opportunity to prove that he can make a positive contribution to society and allow him to come home to his family where he belongs

I pray that you will take this letter into consideration, and help the healing begin.

Thank you so much and God Bless!

Christina Small

To: Parole Board Member/s
State Board of Pardons & Paroles
2 Martin Luther King, Jr. Drive SE
Suite 458, Blacony Level, East Tower
Atlanta, GA 30334-4909

Re: Bryan Harrell

My name is Elizabeth Godwin and I am the mother of Christina Small, Bryan Harrell's fiancée. I am 51 years old and I have been in the medical field for twenty four years as a registered medical coder and insurance specialist.

I have known Bryan Harrell for five years and he is the father of my precious grandson Corbyn, whom I adore.

Bryan is a good man with a good heart, and I love him dearly. He has made bad choices in his life, as we all have, unfortunately, some of his have cost him greatly. This horrible accident has haunted him each and every day of his life and I believe it always will. I know he did everything he could that terrible day to save beautiful Remington. All of our hearts ache for this family, they lost their precious baby and I can't begin to understand their pain and suffering. I know that if Bryan could go back and change the horrific outcome of that day, he would.

Bryan is a very hard worker and a good provider for his family. He is a roofer, and was taught this skill by his 84 year old Grandfather, who still works as a roofer in the family business that he built. Bryan comes from a very good, hardworking family, with strong family values. I have no doubt that Bryan will work very hard to support my daughter and grandson.

Bryan has made a commitment to work with Celebration Recovery in the hopes that he can help others to not travel the road that he has traveled in the past. I do believe he can make a difference in this community with his testimony and personal experiences. I believe God has a plan for Bryan, and part of it is to share his story.

Lastly, my 4 year old grandson desperately needs his father; he misses him so much and struggles with this every day. Corbyn loves to pray at our family gatherings and each night before bed, his prayer is always the same "please bring my daddy home." He has been affected by this tremendously, and does not really understand the situation, but his heart aches for his father.

My husband and I, as well as our entire family are here to support Bryan. We will offer him encouragement and love as he begins his journey of healing and rebuilding his life, and the life of his family.

I pray that you will take this letter into consideration, and help the healing begin.

Thatik you so much & God Bless!/

MANUAL DOM

Elizabeth Godwin

April 29, 2017

State Board of Pardons and Paroles 2 Martin Luther King, Jr. Drive SE Suite 458, Balcony Level, East Tower Atlanta, GA 30334-4909

Dear Parole Board Member:

My name is Eunice Varnum. I am 78 years old and I work for Varnum Roofing as their secretary. I have been working for them for 33 years.

Bryan Harrell is my grandson.

I love Bryan very much. In fact, he lived with me for a few years while he worked for our company. He is and is a better person for it. I think he has matured in prison. I have seen a difference in him for a while a Very good worker and a good person. He made some mistakes but I think he has learned from them now in conversations we have had on the phone. I know he will be a good father to his four-year-old son. He also has a fiancé who has stood by him though all of this. His fiancé and their son live in an apartment adjoining my house. He will be welcome to live there upon his release from prison while he works and saves money for a bigger home for their family.

He has a family that loves him and a good support system to help him adjust. Thank you for your consideration regarding his parole.

Sincerely, Eure Monnem

Eunice Varnum

April 26, 2017

State Board of Pardons and Paroles

2 Martin Luther King, Jr. Drive SE

Suite 458, Balcony Level, East Tower

Atlanta, GA 30334-4909

Dear Parole Board Member:

My name is Trina Helms. I am 56 years old and I work as a Dietary Manager at Memorial Hospital and Manor in Bainbridge, Georgia. I have been in food service for over 20 years and a manager for most of that time.

Bryan Harrell is my son.

Bryan is in prison for two offences, drugs and first degree vehicular homicide. Bryan has made a lot of mistakes in the past. He let drugs take ahold of his life and consume him. There were times that he would not listen to me when I tried so hard to help him see what he was doing to himself and to his family that loves him so much. It seemed that drugs were all he cared about at the time. Bryan was not DUI on March 6<sup>th</sup>, 2012 when he struck the back of the Grand Jeep Cherokee that Remington Walden was riding in. It was a terrible accident that he has to live with every day.

My son has a wonderful, caring heart and I believe that being in prison the past few years have shown him what is most important in life. He has missed out on so much. He has a four year old son that loves him and needs him in his life and a fiancé' that has been there for him through everything. Bryan has so much to offer this world and I believe that he will try to help others who battle with addictions upon his release from prison. I feel in my heart that Bryan has truly changed and will not go back to living the life he was living before. He wants to be a good father and husband. He is a hard worker. My father taught him at a young age how to roof houses and work hard. I believe upon his release that he will be a great asset to our community and a great provider for his family.

Bryan has a very good support system that will be there for him at all times. He has a family that loves him with all our hearts. He has a church family that loves him and is there for him anytime, day or night.

I and our family appreciate your consideration very much for his release.

Sincerely, Truna Helms

Trina Helms

To Whom It May Concern:

Parole Board Member/s State Board of Pardons and Paroles 2 Martin Luther King, Jr. Drive SE Suite 458, Blacony Level, East Tower

Atlanta, Georgia 30334-4909

My name is Jessica Williams. I am a 33 year old Registered Nurse Case Manager with UnitedHealth Group and have been employed with them for almost two years. I have practiced as a nurse for nine years, received my Bachelors of Science in Nursing from Georgia State University, and am now proudly working on my Master's Degree in Nursing.

I have known Bryan Harrell for over five years and consider him family and a friend. He is engaged to my sister, Christina, and also the father of my amazing nephew, Corbyn.

I firmly believe that Bryan is not the sum of his mistakes and is a great person. I know personally from talks he and I have had that he wishes he could go back in time and change the horrible day that accident took place. He lives with nightmares and replays the events over and over to try to make sense of it all. He has a good heart and is a great father and fiancé. Before being in prison, Bryan worked every days roofing and picking up any other jobs he could to support his family. He is a hard-worker and I know he will continue to work hard once he is out of prison. He has a goal to participate in Celebration Recovery and wants to speak out to help others live a better life by sharing his personal experiences. He will not be a stagnant member of society, but an active participant who contributes on a daily basis.

Bryan knows that my husband and I are there for emotional support and encouragement when he needs it. My fondest memories are of us as a family spending the day on the river, with my husband and children and Bryan's family in-tow. Bryan would get his guitar and we would all sing together. Those days were filled with love and support. Much like the days he will be looking forward to when he is released. I pray you will take this letter into consideration as a testament of Bryan's true character, and not look at the past as his only defining moments.

Thank you and God Bless,

Jessica Williams Cell 417-204-9105 May 1, 2017

State Board of Pardons and Paroles 2 Martin Luther King, Jr. Drive SE Suite 458, Balcony Level, East Tower Atlanta, GA 30334-4909

Dear Parole Board Member:

My name is Karen Giles. I am 57 years old and I work in the Accounting Department of Memorial Hospital and Manor in Bainbridge, GA as an Accounting Clerk and Administrative Assistant. I have worked as an Administrative Assistant for over 35 years.

Bryan Harrell is my nephew. He is my sister's son.

I know that Bryan has made bad choices in his life and those choices are the reason he is in prison now. However, Bryan now realizes that choices have repercussions and he has expressed his sincere remorse and regret for his choices and the resulting consequences. Bryan is a good person at heart and has learned from mistakes he has made. I believe that he will be a productive citizen upon release. He is not afraid of hard work. He has considerable experience in roofing and contracting which will be a great asset. He has a son and a fiancé waiting on him that need his guidance and support. His son, especially, is his greatest motivator. He needs a father in his life and Bryan is ready now to be that father and provide a home and financial support to his family if given the chance.

I will be available to Bryan for encouragement and advice. Bryan has a church family that has been supporting him through prayer and cards and our pastor is always available for counseling and support.

I appreciate your consideration very much and appreciate this opportunity to speak on behalf of my nephew.

Sincerely,

Karen Giles

Karen Biles