

COMMONWEALTH OF PENNSYLVANIA, CUMBERLAND COUNTY

CERTIFICATION OF LETITIA SMALLWOOD

I, Letitia Smallwood, being of full legal age, and being duly sworn according to law, do hereby state the following is true and correct to the best of my knowledge, information and belief:

1. I was convicted in 1973, and my conviction was affirmed on direct appeal in 1976. Since then, I have been doing everything in my power to prove my innocence.
2. I have not had legal representation for the vast majority of my time in prison. Specifically, I was unrepresented from the spring of 1982 (when the denial of my Post-Conviction Hearing Act (“PCHA”) petition was affirmed) until January 2014, when the Pennsylvania Innocence Project began representing me.
3. Following my trial and conviction, my family raised the funds to hire Cecil B. Moore, a prominent Philadelphia attorney, for my post-trial motions and my direct appeal. Mr. Moore essentially abandoned me in that process and was held in contempt of court for his conduct. I never met Mr. Moore.
4. My PCHA petition was based on the ineffective assistance of my trial counsel, Herbert “Corky” Goldstein, including:
 - a. The fact that Mr. Goldstein elicited on cross-examination Trooper William Sweet’s opinion that the fire at 11 North Pitt Street in Carlisle, Pennsylvania was of incendiary origin, even though he had not so testified on direct examination; and
 - b. Mr. Goldstein’s failure to call Anna Wagner, Paula Wagner’s mother, as a witness on my behalf even though Mrs. Wagner had told the District Attorney and the Judge during my trial that I could not have been arguing with her daughter in her apartment the afternoon prior to the fire as her daughter was elsewhere at that time, specifically Paula Wagner was at her mother’s house from approximately 4 pm to shortly after 8 pm.
5. After my PCHA petition was denied, I was at a loss as to how to prove my innocence in court.
6. However, in April 1988, I voluntarily submitted to a psychological evaluation and a polygraph test, the results of which were favorable. These tests were set up by my mother. I was under the impression that the organization that did the testing would help me with my case, but I never heard from them again.

7. I filed a petition for commutation of my sentence in 1991, one basis of which was my innocence. I asserted my innocence in the petition even though others had suggested to me that it would hurt my chances; I could not lie about my case. The SCI Muncy Superintendent gave me a favorable recommendation for commutation, but my petition was ultimately denied.
8. Although my efforts in seeking post-conviction relief and commutation proved unsuccessful, I nevertheless continued to search for possible ways of establishing my innocence. This process was difficult for me because I have no special knowledge of science or the law. I also had very limited resources at SCI Muncy. The law library mainly had books (and later a computer program) that I could use to search for and Shepardize cases. It had some dictionaries and books of contact information for attorneys and state politicians. I had access to the *Patriot* and newspapers from a few other counties. I have never had internet access. To my knowledge, the library did not have any books on arson cases.
9. My search is reflected in numerous letters and other documents, which I summarize below.
10. On January 28, 1999, attorney Gregory Knight wrote me that he had reviewed the materials I had previously sent him and felt that they supported my claim of innocence but that he could not give his own opinion without a full review of my file. He informed me that my options were to file either a Post-Conviction Relief Act (“PCRA”) petition or a pardon application. He said that he could “not be optimistic” that either option would lead to relief. He recommended that I proceed with a pardon application and quoted me his fees for assistance, as well as giving me the name of an individual who would help me with the application for free.
11. In early 1999, I saw a television program that featured Dr. Gerald Hurst. Dr. Hurst explained the advances that had been made in the field of fire investigation and also explained how he had assisted a woman charged with a crime similar to the one I was get her conviction overturned.
12. In February 1999, I petitioned the Court for copies of my transcripts and discovery materials so that I could give them to Dr. Hurst.
13. In March 1999, the Court ordered that my transcripts be sent to me.
14. In July 1999, I petitioned the Court for a copy of the Pennsylvania State Police report regarding my case.
15. In December 1999, that petition was denied, and I was ordered to obtain the report directly from the State Police. However, I also made other efforts to obtain the report,

which my friend Juanita Edrington-Grant ultimately received through the Cumberland County Public Defender's Office.

16. During this time period, I also began to correspond with Dr. Hurst regarding my case. Specifically:
 - a. On March 2, 1999, I wrote to Dr. Hurst to explain my situation and ask for his assistance with my case.
 - b. On March 13, 1999, Dr. Hurst wrote back and requested documents from my case for his review; he said he was willing to try to assist me.
 - c. On March 28, 1999, I wrote to Dr. Hurst to give him the documents I had received from the Court, contact information for people involved in my case, and a story of my case in my own words, which he had requested.
 - d. On April 13, 1999, I wrote to Dr. Hurst to give him some additional documents that my sister Lisa Smallwood had found.
 - e. On May 14, 1999, Dr. Hurst wrote to me and stated that he believed I was convicted on "weak circumstantial evidence." He noted that my attorneys had all overlooked whether there had been sufficient proof of arson. He "concluded that the arson investigator did not have any sound scientific basis for his opinion that the fire was arson." He asked how we could retain a Pennsylvania attorney to write a writ of habeas corpus for me. He also noted that he did not have accurate floor plans of the building and had questions regarding what the building was like, including what the stairs, walls, and apartment doors were made of.
17. After this exchange of correspondence, Dr. Hurst posted an essay regarding my case on an internet website, www.truthinjustice.org, in which he critiqued the evidence presented at my trial and Trooper Sweet's investigation and called for an attorney to volunteer to assist me.
18. I have also enlisted friends and family to assist me in my efforts to prove my innocence and to find an attorney to help me do so. Among other people, I was assisted by my sister Lisa, my cousin Kevin Smallwood, and my friend Juanita Edrington-Grant, who had previously been incarcerated with me here at SCI Muncy.
19. Over the years, my sister Lisa contacted a number of organizations and media outlets on my behalf. Once I began to correspond with Dr. Hurst, Lisa also did research on the history of the building at 11 North Pitt Street, communicated with fire investigation experts to see if they would be willing to assist with my case, and communicated with Professor Thomas Place, from Penn State, The Dickinson School of Law, who agreed to work with Dr. Hurst on my case but who never actually represented me.

20. In 1999, my cousin Kevin worked to obtain floor plans and other information for me, but he was unsuccessful. For example, he was informed that the records at the Recorder of Deeds did not extend far enough back to get information about the building at 11 North Pitt Street, that neither the tax and assessment office nor the borough code and planning office could help, and that the State Police would only turn over their reports if they were subpoenaed.
21. In the 1999-2000 period, I worked with an inmate and instructor here at SCI Muncy to recreate floor plans of the building at 11 North Pitt Street. The inmate and instructor worked with the CAD program, for which classes are taught here at Muncy. However, to my understanding, Professor Place thought that some other reconstruction needed to be done.
22. Beginning in June 1999, I asked Ms. Grant to work on finding information about my case and to serve as a liaison between me, Dr. Hurst, Professor Place, and others. She helped me in this capacity from 1999 to 2009.
23. The following are examples of contacts between myself, Ms. Grant, Professor Place, the Cumberland County Public Defender's Office, Dr. Hurst, and other individuals and organizations from whom I sought assistance during this ten-year time period. This is not a complete list, as there is some correspondence that I have been unable to locate.
 - a. In June 1999, I twice wrote Ms. Grant to ask for her assistance in finding accurate floor plans and asked her about Dr. Hurst's progress in putting together a legal team for me.
 - b. On June 26, 1999, Dr. Hurst wrote me that the Cumberland County Public Defender's Office had agreed to help me, and I sent a copy of his letter to Ms. Grant.
 - c. On July 27, 1999, I wrote to Ms. Grant and asked her to look into Henry Keith Fehl, who had been arrested for setting the false alarm on the night of the fire.
 - d. On July 28, 1999, Ms. Grant wrote me to summarize her efforts on my behalf, including speaking with Ellen Barry at the Public Defender's Office, e-mailing with my cousin Kevin, and leaving messages for a professor at Temple University who I had suggested she contact to seek assistance with my case.
 - e. In September 1999, Ms. Grant informed me that she had talked with Mr. Fehl and his father but did not get any useful information. Also in September 1999, I asked Ms. Grant to follow up on Professor Place's work on my case as I had not heard from him or Mr. Hurst recently.

- f. In the fall of 1999, I also reached out to Centurion Ministries, an organization that works to free individuals who have been convicted of crimes they did not commit, for help with my case.
- g. On October 18, 1999, Centurion Ministries wrote to me to ask whether Dr. Hurst was still involved in my case and stated that they were interested in getting more information.
- h. On October 31, 1999, Dr. Hurst wrote a letter to Centurion Ministries on my behalf. He pointed them to his summary of my case and stated that he was making arrangements to send them a disk of documents regarding my case.
- i. On November 1, 1999, Centurion Ministries wrote me to ask for my transcripts, but stated that this request did not mean they were taking my case.
- j. On November 4, 1999, I wrote to Ms. Grant to tell her to authorize Dr. Hurst to send a disk containing my case materials to Centurion Ministries.
- k. On November 8, 1999, Ms. Grant sent me copies of her e-mail exchanges with Dr. Hurst regarding my case.
- l. On December 1, 1999, I wrote to Ms. Grant asking what direction my case was taking.
- m. On December 22, 1999, Steven Rice, a legal intern with the Cumberland County Public Defender's Office, wrote me to say that he understood my frustration with the slow progress on my case and that he was waiting to speak with Professor Place due to the complexity of the legal issues involved; he stated he would move forward even without Professor Place.
- n. On January 9, 2000, I wrote to Ms. Grant to let her know that I had asked Mr. Rice to contact Professor Place. I also questioned whether I should start a defense fund, hire an expert, and/or try to gain publicity for my case.
- o. On January 12, 2000, Centurion Ministries wrote to me asking for Ms. Grant's contact information and also asked what efforts I had made to get floor plans for the building at 11 North Pitt Street.
- p. On February 2, 2000, Mr. Rice wrote to me to tell me that Professor Place had agreed to assist with my case and would be working with a law student on it.
- q. On February 17, 2000, Professor Place wrote to me. He stated that he believed that a diagram of the second and third floors of the building at 11 North Pitt Street would be necessary for an expert to be able to give an opinion in my case. He said that his assistant would attempt to locate people familiar with the building

and would attempt to put information together for experts. He also asked me for a copy of the police report.

- r. On February 23, 2000, I wrote to Ms. Grant and asked her to ask my cousin Kevin to send a letter to Professor Place regarding his efforts to obtain records about the building.
- s. On February 28, 2000, Ms. Grant wrote me that she had forwarded to Professor Place a July 12, 1999 letter that my cousin Kevin had written to me detailing the obstacles he had encountered in trying to find the original floor plan and other records for the building.
- t. On March 20, 2000, Centurion Ministries wrote to me and stated that one of their volunteers had spoken with Professor Place, who was committed to my case. Because of this, Centurion Ministries informed me that they were going to move on to requests for assistance from people who had no one else to help them. They informed me that Professor Place hoped to win a new trial for me with the help of Dr. Hurst.
- u. On May 13, 2000, Dr. Hurst wrote to me and told me that I had “not been forgotten,” and that Professor Place was looking for an additional expert in the area. Dr. Hurst told me that he remained available to help and had contacted Court TV about my case. He told me that post-conviction efforts are complicated and time consuming.
- v. On May 21, 2000, I wrote to Ms. Grant to let her know that I had not yet heard from Professor Place’s assistant.
- w. On June 28, 2000, Ms. Grant wrote to me and told me that she had been able to speak to Professor Place for the first time. She said that they ordinarily communicated through voice mail and e-mail. Professor Place told her that he was having difficulty locating floor plans for the second and third floors of the building. He was going to contact Dr. Hurst about the effect on the case of not having floor plans.
- x. On July 13, 2000, Ms. Grant wrote me that she had given Professor Place my mother’s contact information to see if my mother could help to find sources for reconstructing plans of the building.
- y. On July 30, 2000, I wrote to Ms. Grant to tell her that I had received a letter from Professor Place who had been out of the country. I let her know that I still had not heard from his intern and that my cousin Kevin had found a realtor who might have the floor plans. I asked whether I should send the realtor some money.

- z. On September 12, 2000, I wrote to Ms. Grant to tell her that my mother knew the realtor who might have the blueprints and asked her to take my mother to see him. I also informed Ms. Grant that my mother was not well.
- aa. On September 13, 2000, I wrote to Ms. Grant to tell her that I did not realize that the student working with Professor Place had contacted the realtor. I also suggested talking with Bonnie Aucker or Bobby Baltimore. I further asked Ms. Grant to find John Rhodes and to ask around about Steve Johnson's parents and sister. I also asked about whether there were other things we could do regarding the floor plans, such as using the ones the Commonwealth used at my trial, running an ad in the newspaper, hiring an investigator, and/or finding out if the building's owners were still living.
- bb. Sometime in September 2000, Ms. Grant wrote to me and included a list of contacts she had given to Professor Place. These were individuals he could talk to in trying to reconstruct the second and third floors of the building. She asked me whether there was anyone else I could add to the list.
- cc. On September 15, 2000, Ms. Grant wrote me that Professor Place had left her a voice mail stating that an intern had met with the realtor, P.K. Miller, the previous spring, but Mr. Miller did not have the floor plans for the building and could not be of great assistance. Professor Place also said that he was "stuck" without finding people who could reconstruct the second and third floors of the building and that he did not want to go ahead with my case without a "solid reconstruction" of those floors.
- dd. On September 21, 2000, I responded to Ms. Grant and gave her additional information about individuals who might have knowledge about the building. I also suggested checking zoning permits in City Hall. I informed Ms. Grant that I had written to two investigative agencies to see if I could retain them and had also asked a cousin of mine for help.
- ee. On October 3, 2000, an investigative agency, Spotlight Enterprises, wrote that they had reviewed my information and would attempt to assist me. The investigator asked why the existing floor plans of the building were believed to be inaccurate and said that she would not quote me a fee at this point because she was not sure if she would be able to assist.
- ff. On October 9, 2000, I wrote to Ms. Grant to ask her to assist the investigator and told her I had also sent copies of the investigator's letter to Dr. Hurst and Professor Place.
- gg. Sometime in October 2000, I wrote to Ms. Grant to ask whether the investigator had contacted her.

- hh. On October 27, 2000, I received a letter from Ernest Preate who I had previously contacted for assistance. I knew of Mr. Preate because he gave lectures at SCI Muncy on topics including commutation. Mr. Preate informed me that he had not been reinstated to the bar and was unable to give me legal advice.
- ii. On November 5, 2000, I wrote to Ms. Grant to tell her that Dr. Hurst had sent me information about someone who wanted to publish my story. I asked her for an update on Professor Place's activities.
- jj. On December 5, 2000, I wrote to Ms. Grant to ask her to get in touch with Professor Place after the first of the year to find out what information he needed about the building.
- kk. On January 9, 2001, Professor Place wrote to tell me that he had been having difficulty locating information missing from my case file and that Dr. Hurst had requested some information concerning the hallways in the building. He asked whether my family had the funds to pay for an investigator to locate and interview people who lived in the building.
- ll. On January 12, 2001, I wrote to Ms. Grant to let her know that I had received a letter from Professor Place, who had asked whether my family could afford to hire a private investigator. I said that I had told him we could and asked for an estimate. I asked Ms. Grant to look through her files for copies of my trial exhibits.
- mm. On January 25, 2001, I wrote to Ms. Grant to thank her for "staying on top" of Professor Place. I offered to pay for an investigator.
- nn. On February 11, 2001, I wrote to Ms. Grant to let her know that I felt Professor Place's work was slow. I let her know that Robert Baltimore visited my mother frequently and that I wanted his insight on reconstructing the building. When my mother asked Robert Baltimore about the building, he claimed not to remember anything.
- oo. On February 13, 2001, Stephanie Chertok of Spotlight Enterprises wrote to me saying that she had spoken with Professor Place and explained to him that she was an attorney as well as a private detective. She said Professor Place told her he would contact her if needed, but he had a team together including a private investigator.
- pp. On February 14, 2001, I forwarded Ms. Chertok's first letter to Ms. Grant and asked Ms. Grant to find out whether Professor Place had responded to her.

- qq. On February 19, 2001, I forwarded Ms. Chertok's second letter to Ms. Grant and told her that I did not know that Professor Place already had an investigator. I asked Ms. Grant to see what she could find out about Professor Place's investigator.
- rr. On February 25, 2001, I wrote to Ms. Grant to express my frustration that my mother would not ask people about reconstructing the building. I sent her an article about the building from 1959 and noted that I believed the realtor, P.K. Miller, would be key to the reconstruction of the building as he had hired the contractors to do the work on it when it was converted into apartments.
- ss. On September 9, 2001, I wrote to Ms. Grant to tell her that I had not heard from Professor Place or Dr. Hurst. I told her that my mother asked Earl Hodge about the building and he said he would think about it. I expressed my frustration with Professor Place's slow progress.
- tt. On March 8, 2002, Frank Loney wrote to me. He told me that he had been retained by Professor Place. He said that he knew a lot about the individuals involved in my case because he grew up in Carlisle. He also said that he had devoted at least fifty hours to my case and would continue to work on it. Mr. Loney wrote that he kept Professor Place advised of his progress through written reports. He had interviewed Dennis Giles, one of Mike Baltimore's best friends, on November 16, 2001, and had given that information to Professor Place. He said that he was looking for John Rhodes. He said that we could discuss a nominal fee for his work.
- uu. On March 13, 2002, I forwarded Mr. Loney's letter to Ms. Grant and asked her what he meant by a nominal fee and whether I should pay it at that time.
- vv. On March 13, 2002, I wrote Ms. Grant another letter to tell her that I was frustrated because it had been a year and Professor Place's investigator had not done anything. I told her my counselor had called and left messages for the investigator, but he never returned the calls. I asked her to let Professor Place know that I wanted to hire my own investigator. I also let her know that I planned to contact Centurion Ministries to see if they would pick up my case again because I knew they had their own investigator. I stated that I just wanted to move my case forward. I asked Ms. Grant to e-mail Dr. Hurst to see what he suggested because he also had not answered my letters.
- ww. On August 16, 2002, Dr. Hurst wrote to me to tell me that he believed Professor Place had been informed by another expert that Dr. Hurst's approach to my case was not correct. Dr. Hurst said this did not concern him because there was more than one way to approach it, but he emphasized that I needed a competent

attorney who understood Pennsylvania post-conviction law. Because I knew that Professor Place was an expert in that area, I continued to rely on his commitment to my case. I believed Professor Place's opinion that he could not go into court with only one expert. In his August letter, Dr. Hurst also thanked me for sending the first and third floor plans and information about the building's drop ceiling. He noted that the second floor plan was missing and stated that the more details he had, the better he would be able to model the fire.

- xx. On October 9, 2002, Professor Place wrote to tell me that he had spoken with Ms. Chertok and her schedule did not permit her to take on new clients. He said that she indicated she would have another person contact Professor Place regarding the investigation, but he had not heard from anyone. Professor Place told me that he had obtained information about a third fire expert and would attempt to contact that person to see whether he would be interested in reviewing my case.
- yy. On June 11, 2004, Heather Griner of Centurion Ministries wrote to update me on a meeting she had with her supervisor about my case. Her supervisor agreed with Professor Place that it would be difficult to get a good expert without the funds to pay for his time. She stated that her supervisor did not know of any arson expert to refer Professor Place to other than the ones he had already contacted. She also asked for additional details about my case.
- zz. I wrote Ms. Griner back to ask her to send me the names of the experts her supervisor had mentioned. I noted that Professor Place said he could not get an expert pro bono but expressed my view that no expert would concur with Dr. Hurst's opinion unless I could get a reputable investigator to speak to former residents of 11 North Pitt Street to fill in gaps in information. I said I had told Professor Place that expense would be handled. I also answered Ms. Griner's questions and sent her a news clipping regarding Mr. Fehl as well as a copy of the police report in my case.
- aaa. On September 28, 2004, I wrote Ms. Grant to tell her that Professor Place had just stopped working on my case. He wanted a second expert for the case, but he had never allowed anyone to help find the residents of the building so that the second expert could have a clear picture of it. I told her that I had tried to hire numerous investigators and lawyers to help with my case, and Professor Place had told me that he would contact them. I let her know that previously I had not had the kind of money it takes to hire an attorney, but that I might now be able to get financial assistance. I told her that I was thinking of hiring Mr. Knight, who I had corresponded with previously and who was an advocate for lifers, regarding a pardon application. I asked Ms. Grant to help me find an attorney. I also suggested that we get Dr. Hurst to testify through a deposition because of his poor health.

- bbb. On October 11, 2004, I wrote Ms. Grant to let her know that I had heard of the attorney she had contacted. I emphasized the need to get Dr. Hurst's testimony, which I thought could open the door for commutation, and my concern that he would pass away before I could litigate his findings.
- ccc. On November 11, 2004, I wrote to Ms. Grant to ask her to retain attorney Lenora Smith and said that I would ask Professor Place to forward his files to Ms. Grant. However, I noted that I believed that Mike Lane, a fire investigator contacted by Professor Place, had most of Professor Place's materials. I asked Ms. Grant to contact Centurion Ministries, but told her that I believed hiring Ms. Smith was the way to go. I told Ms. Grant that Professor Place left off with looking for a second expert opinion and that the investigator we hired had not talked to anyone who had lived in the building. I told her that my sister Lisa had been looking for people who had knowledge of the building.
- ddd. On February 13, 2005, I wrote to Ms. Grant to tell her that, based on our last conversation, she should contact my case worker at Centurion Ministries and explain that we needed assistance with locating residents of the building to provide additional information. I told her that Lisa had sent me a packet of information about the building from the Carlisle archives and asked her to forward this to Mr. Lane and Dr. Hurst. Ms. Grant responded on February 17, 2005 to tell me that she had written to Centurion Ministries.
- eee. On March 5, 2006, I wrote Ms. Grant to let her know that I had received the e-mails from Professor Place that she had sent to me. I told her that I was disappointed that experts did not want to get involved with my case but that I would not give up. I suggested looking for experts out of state and told her that it was vital to find Joe Roebuck and John Rhodes, who had both testified against me. I believed that they would give Professor Place a new angle to get my case back into court.
- fff. On May 10, 2006, my sister Lisa wrote me to let me know that Dr. Hurst agreed to help me with commutation. However, he also told Lisa he had other ideas for my case and asked her to call the Innocence Project in New York, which was working on the establishment of an Arson Review Committee. Lisa also spoke with Mr. Ferrera, an investigative reporter recommended by Dr. Hurst, to attempt to gain media exposure for my case. Nothing came of these efforts.
- ggg. On February 13, 2007, Tammie Sen, secretary to David Smith of Associated Fire Consultants, Inc., wrote me that Mr. Smith would be glad to look over my information and asked me to forward my files. I did so but never heard anything further from Mr. Smith.

- hhh. On July 2, 2007, James Munger of James G. Munger & Associates wrote to me to tell me that his firm was available to conduct a review of my case on a pro bono basis. He said that they would work with me on fees and costs for things like court appearances and asked for information about my legal counsel. At that time, I did not have legal counsel. I did not hear anything further from Mr. Munger.
- iii. In 2006 and 2007, my case was included in articles in *The Morning Call* and *The Philadelphia Inquirer* about developments in arson investigations. I spoke to the *Inquirer* reporter, but I did not even know that *The Morning Call* was covering my case. To my knowledge these stories did not generate any outside interest in my case. I did not hear from any attorneys, investigators, or experts in response to them.
- jjj. On June 28, 2009, I wrote to Ms. Grant to let her know that I received her e-mail about a lawyer who wanted a retainer to work on my case. The lawyer wanted to forward my case to the Innocence Project, but I had already contacted Innocence Projects around the country. I expressed my frustration that Professor Place had procrastinated about my case for ten years. I told her that I had not heard back from Mr. Munger or Mr. Smith, and I asked Ms. Grant to follow up with them.
24. Throughout the years, I also wrote to a number of other individuals and organizations, including: an innocence organization at Northwestern University, which gave me the contact information for Centurion Ministries; Susquehanna Legal Services; the Pennsylvania Institutional Law Project; the Defender Association of Philadelphia; the Innocence Project in New York, which told me that it only took DNA cases; the Innocence Institute at Point Park University, which told me that it only took cases with a certain radius of Pittsburgh; Edgar Bayley, the district attorney who had prosecuted my case; Justice Nix of the Pennsylvania Supreme Court, who I asked to reconsider his opinion in my case and to support my release by writing a recommendation to the Governor for commutation; John Lentini, a fire investigation expert; National Legal Professional Associates, which I discovered charged \$7300 to prepare a post-conviction motion; and a number of church groups. I also wrote to the media, including Oprah Winfrey, Montel Williams, and ABC News, in an effort to get someone to listen to my story.
25. On September 24, 2009, I wrote to the Pennsylvania Innocence Project asking for assistance with my case.
26. I also continued to consider applying for commutation. On January 20, 2010, Professor Place wrote to me that he would be happy to be listed as my lawyer on a commutation application but that, in his experience, my application would be denied if I continued to assert my innocence. I therefore decided not to submit another commutation application.

27. I have no money, except for approximately \$300.000 in my prison account. My family members are also of limited means.

I verify that the facts set forth in this statement are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of Section 4904 of the Pennsylvania Crimes Code (18 Pa. C.S. § 4904) relating to unsworn falsification to authorities. No one has promised, given me anything, or threatened me to make this statement.

Leticia Amalwood
Name

5-15-14
Date

Date of Birth: 7-12-52

Address: Box 150
Muncy PA 17756

Col Patton
Witness

5-15-14
Date