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# **APPENDIX 1**



1 I ask you to do this: As the State presents their  
2 case.

3 MR. JACKSON: Excuse me, Your Honor. I  
4 am going to have to object one more time. This is an  
5 argument. This is not an opening statement.

6 MR. MARTIN: This is not an argument.  
7 I am reminding the jurors of the obligation of the law and  
8 that alone, Your Honor.

9 THE COURT: We need to proceed, Mr.  
10 Martin.

11 MR. MARTIN: As the evidence is  
12 presented, please bear this in mind. The ultimate  
13 question for you to decide is: Has the State taken out of  
14 your mind and erased it as a possibility any other  
15 reasonable explanation for the circumstances that they  
16 present?

17 Thank you.

18 THE COURT: Call your first witness,  
19 Mr. Jackson.

20 MR. JACKSON: State calls Johnny Webb.

21 THE COURT: Were you sworn?

22 THE WITNESS: (Shaking head negatively)

23 THE COURT: Raise your right hand.

24  
25 (Witness sworn)

1 THE COURT: Take your seat there in the  
2 witness chair.

3 MR. JACKSON: May I proceed?

4 THE COURT: Yes, sir. You may.

5 JOHNNY EVERETT WEBB,

6 After having been called as a witness by the State and  
7 after having been first duly sworn to tell the truth, the  
8 whole truth, and nothing but the truth, the witness  
9 testified on his oath as follows:

10 DIRECT EXAMINATION

11 BY MR. JACKSON:

12 Q Would you state your name, please?

13 A Johnny Everett Webb.

14 Q Johnny, I think it's apparent the place that  
15 you come from. Tell me where you live at this time.

16 A I live in Navarro County Jail, B-21 cell.

17 Q How long have you been in the Navarro County  
18 Jail, Johnny?

19 A Six, seven months.

20 Q All right. My understanding is that you're  
21 confined in the Navarro County Jail based on a robbery  
22 conviction; is that correct?

23 A Yes, sir.

24 Q How long have you been in jail on this robbery  
25 charge, Johnny?

1 A Six or Seven months.

2 Q All right. It's my understanding that you were  
3 convicted of the crime of robbery back in March of this  
4 year; is that correct?

5 A I believe so.

6 Q All right. How old are you, Johnny?

7 A Twenty-two.

8 Q You have had a rather extensive criminal  
9 histroy, have you not?

10 A Yes, sir, I have.

11 Q You've been charged and convicted one time or  
12 another for stealing a car; is that right?

13 A Yes.

14 Q Of delivery of marijuana?

15 A Yes, sir.

16 Q Theft?

17 A Yes, sir.

18 Q Forgery?

19 A Yes, sir.

20 Q And of burglary, in addition to the robbery; is  
21 that right?

22 A Yes, sir.

23 Q Johnny, what is your problem as far as not  
24 being able to stay out of trouble?

25 A Drugs.

1 Q I take it you are off drugs now.

2 A Yes, I am, Except for the medication.

3 Q Okay. You have any trouble with mental  
4 impairment or anything like that, Johnny?

5 A Not always.

6 Q Okay. You have a good grasp of what is  
7 happening around you?

8 A Yes, I do.

9 Q Okay. What kind of education do you have?

10 A About 10th grade.

11 Q All right. Johnny, while you were in jail, did  
12 you come in contact with a person named Cameron Todd  
13 Willingham?

14 A Yes, I did.

15 Q Is that the same Todd Willingham that is  
16 present here in this courtroom today?

17 A Yes, it is.

18 Q Is he here seated at the counsel table with his  
19 defense attorneys?

20 A Do what?

21 Q Is that the same Cameron Willingham seated here  
22 with his defense lawyers?

23 A Yes, it is.

24 Q What do you do at the jail, Johnny?

25 A Housekeeper.

1 Q Are you a trusty?

2 A Yes, sir, I am.

3 Q What does that mean?

4 A It just means I get to go out, clean up, you  
5 know, in the morning and at night, just keep the floors  
6 mopped, swept.

7 Q How did you happen to come in contact with  
8 Cameron Willingham?

9 A Doing my normal thing, you know, just sweeping  
10 and mopping every day.

11 Q Did you know what he was in jail for?

12 A When I first met him?

13 Q Yes, sir.

14 A No, sir, I didn't. It took me a couple days  
15 before I found out what he was in jail for.

16 Q How did you find out?

17 A I was told.

18 Q By somebody else at the jail?

19 A Yeah.

20 Q Did you have a chance to engage him in  
21 conversation?

22 A Yes, sir, I did.

23 Q Did he know what you were in jail for?

24 A I'm not sure. I don't know if I told him or  
25 not. I imagine he does, though.

1 Q Did you ever talk to him about why he was in  
2 jail?

3 A Yeah, I did.

4 Q All right. Did anybody ever ask you to go find  
5 out what Cameron Willingham knew about this crime?

6 A No, sir, they did not.

7 Q Were you working for any law enforcement agency  
8 when you talked to him?

9 A No, I was not.

10 Q Did anybody ever threaten you or coerce you?

11 A No, sir, they never did.

12 Q What did Mr. Willingham tell you about the  
13 incident of the fire at his house?

14 MR. MARTIN: Object to the hearsay, Your  
15 Honor.

16 THE COURT: I overrule the objection.

17 MR. JACKSON: You may answer that  
18 question.

19 THE WITNESS: He said he had done it.

20 BY MR. JACKSON:

21 Q Pardon?

22 A He said he had done it.

23 Q Can you tell us what he told you about those  
24 events?

25 A Yes, sir.

1 MR. MARTIN: We object, Your Honor, to  
2 the hearsay.

3 THE COURT: I overrule the objection.

4 MR. JACKSON: You may answer that.

5 THE WITNESS: He was telling me about  
6 something about he had came home or something, and he  
7 was -- I don't remember exactly where he was at or what he  
8 was doing -- but when he came in the house that one of the  
9 babies were injured or dead or something like that and he  
10 freaked out and --

11 Q Did he tell you who had injured the child?

12 A His wife.

13 Q All right. Please continue.

14 A And he didn't know what to do. She was crying  
15 and going on, and he said he thought of a way to get them  
16 all out of it by setting the house on fire.

17 Q Did he tell you what he did at that point?

18 A Yes, he did. He said that he took some kind of  
19 lighter fluid, squirting around the walls and the floor  
20 and set a fire.

21 Q Did he tell you anything else about how he  
22 attempted to shift the blame from him to someone else?

23 A I'm not sure.

24 Q Did he tell you anything about what he did with  
25 the children?

1 MR. MARTIN: We object. Leading.

2 THE COURT: I overrule the objection.

3 THE WITNESS: Yes. He said that he had  
4 burned one of the kids. I don't know which one, and I  
5 assumed at the time that it was --

6 MR. MARTIN: We object to the witness  
7 speculating.

8 THE COURT: I sustain the objection.

9 BY MR. JACKSON:

10 Q You can't tell us about your assumptions. Just  
11 tell us what he told you.

12 A That he took some paper, wadded it up, and lit  
13 a fire and burned one of the kids on their arm, on their  
14 forehead to make it look like they were playing with fire.

15 Q What else did he say, Johnny?

16 A That he ran out of the house to go call 911,  
17 and someone asked him to go get the kids. He said they  
18 were still in the house, and someone told him to go get  
19 them. He refused.

20 Q Did he tell you why he wouldn't go back in the  
21 house?

22 A Because he knew they would find out one of the  
23 babies was injured.

24 Q Did he say whether he left all the children in  
25 the same room?



1 MR. MARTIN: Object. Leading.

2 THE COURT: Overrule the objection.

3 THE WITNESS: No, he didn't.

4 BY MR. JACKSON:

5 Q Why did you decide to tell anyone about this  
6 conversation?

7 A Because it got to bugging my conscience.  
8 That's why -- I mean, three kids -- I mean, you know,  
9 someone tells you something like that, it's not something  
10 to be taken lightly.

11 Q Did it worry you?

12 A A lot, yeah.

13 Q Who did you tell about it?

14 A Robert Chapman.

15 Q Based on your conversation with Mr. Chapman,  
16 did you elect to talk with me?

17 A Well, in a way. Not exactly you; but, you  
18 know, I told him, I said, "What should I do 'cause I don't  
19 really want to go get into it, but it's bugging me." And  
20 he said, "Well, yeah, it's true."

21 MR. MARTIN: Object. Hearsay.

22 THE COURT: Overrule the objection.

23 THE WITNESS: But, you know, he said,  
24 "Now it's on my conscience, too" because I had told him.  
25 He said, "I don't think I can -- I don't think I can

1 handle that on my conscience."

2 So it went on about three weeks. He said, "Look, do  
3 you want me to tell someone?" I said yeah. That's when  
4 he said, "Okay. I will tell them what you told me."

5 Q Do you remember the first time I talked to you,  
6 Johnny?

7 A Yes, I do.

8 Q You remember the first thing I told you?

9 MR. MARTIN: Your Honor, we object to  
10 hearsay.

11 MR. JACKSON: I will rephrase the  
12 question, Your Honor.

13 THE COURT: All right, sir.

14 BY MR. JACKSON:

15 Q Do you remember our conversation when I first  
16 met with you over across the street?

17 A Somewhat, yes, I do.

18 Q Johnny, have I ever promised you anything in  
19 return for your testimony in this case?

20 A No, sir, you haven't.

21 Q As a matter of fact, I told you there is  
22 nothing I can do for you.

23 MR. MARTIN: Object. Leading.

24 THE COURT: Overrule the objection.

25 THE WITNESS: You said there was nothing

1 that no one can do for me.

2 BY MR. JACKSON:

3 Q Do you understand you placed yourself at risk  
4 by coming forward with this testimony?

5 MR. MARTIN: Your Honor, we object to  
6 that as leading, assuming some facts not in evidence.

7 THE COURT: Go ahead.

8 MR. MARTIN: There is no evidence  
9 whatsoever that he has been placed at risk at all in any  
10 way.

11 THE COURT: I sustain the objection.

12 MR. JACKSON: Pass the witness.

13 MR. MARTIN: Judge, I need to get the  
14 black board, if I may.

15 THE COURT: Sure.

16 CROSS-EXAMINATION

17 BY MR MARTIN:

18 Q Mr. Webb, how long have you been in jail?

19 A Six, seven months.

20 Q And you were in jail -- this time, was it  
21 robbery or burglary?

22 A Both. Burglary, robbery and forgery.

23 Q Who did you rob? A woman?

24 A Yes.

25 Q Robbed her of her purse?

1 A No, I did not.

2 Q What did you take?

3 A Nothing.

4 Q You were charged with robbery, yet, you did not  
5 take anything?

6 A True.

7 Q Tried to take something?

8 A What they say I did.

9 Q But it's not true?

10 A I don't know if it's true or not.

11 Q You don't know whether you are guilty of  
12 robbery or not?

13 A True.

14 Q They did a fabrication on the part of the  
15 police?

16 A I doubt that very seriously.

17 Q Then you think it is true?

18 A I could have done it, but I do not remember  
19 doing it.

20 Q Because you were under the influence of drugs?

21 A True.

22 Q What kind of dope was it? Crack cocaine?

23 A Marijuana and drink.

24 Q You been smoking marijuana and drinking since  
25 you were nine?

1 A About that, yes.

2 Q And have smoked marijuana and drank liquor  
3 since the age of nine until -- how old are you now?

4 A Yes, drink, until I was 16 or 17.

5 Q All right. Smoked marijuana since you were  
6 nine?

7 A Right.

8 Q And on occasion you have mental difficulties?

9 A Yes, sir.

10 Q You are on medication for that now?

11 A Yes, sir.

12 Q And what has the doctor diagnosed your mental  
13 problem as being?

14 A Post dramatic stress disorder.

15 Q And what is it that caused the stress and the  
16 trauma?

17 A I decline to answer that question in open  
18 courtroom.

19 Q Well, I ask you to answer me immediately. What  
20 caused it?

21 A I still decline.

22 MR DUNN: May we have an instruction,  
23 Your Honor. I think that's very probative in the  
24 credibility of this witness.

25 THE COURT: Mr. Webb, you need to answer

1       that question.

2                       THE WITNESS: I was assaulted in the  
3       penitentiary.

4       BY MR. MARTIN:

5           Q       And that was when?

6           A       '88.

7           Q       And how long were you in the penitentiary that  
8       time?

9           A       Thirty days shock probation.

10          Q       And you were sexually assaulted?

11          A       Yes.

12          Q       Raped by an inmate?

13          A       Yes.

14          Q       I don't mean to be indelicate, but you can see  
15       this is quite important, can you not?

16          A       Yes.

17          Q       And since that time -- and we sympathize with  
18       you; we do -- but since that time, you have suffered  
19       off-and-on mental difficulties?

20          A       Yes, I have.

21          Q       And would you tell us what the medication is  
22       that you take now?

23          A       It's Elavil, but I get the generic form.

24          Q       It's prescribed to you by a doctor?

25          A       Yes, it is.

1 Q You've seen a psychiatrist?

2 A Yes, I have.

3 Q He has diagnosed you as having these mental  
4 problems?

5 A Yes, he has.

6 Q And you went to jail this time, did you tell  
7 me, in February?

8 A No, I did not tell you February.

9 Q What did you say?

10 A I believe I came to jail January the 9th of  
11 this year.

12 Q Oh, and have been in there continuously since  
13 that time?

14 A I have never been out since January the 9th.  
15 I've been there continuously.

16 Q But the last day that you had outside of the  
17 jail, you were under the influence of marijuana and  
18 liquor? Is that the day you were arrested?

19 A I was under the influence of not only marijuana  
20 and alcohol but, yet, crack cocaine, too, the day I was  
21 arrested.

22 Q And how long had you used crack cocaine?

23 A Probably four or five months.

24 Q And do you steal to get money to buy crack?

25 A Most people do.

1 Q Is it possible for you to describe for us the  
2 strength of the addiction to crack cocaine? Would you say  
3 it is utterly overwhelming to be --

4 A No, I wouldn't.

5 Q You can control your actions when you were  
6 under its influence?

7 A Sometimes.

8 Q And sometimes you cannot?

9 A Right.

10 Q The strength of the addiction is so strong that  
11 you will go out and rob people, correct?

12 A Some people do.

13 Q You do, do you not?

14 A No, I did not.

15 Q So, are you telling us that you did not rob  
16 someone or that you did or that you just don't know?

17 A I'm telling you I did not rob someone for the  
18 money to get crack cocaine.

19 Q Why did you rob them?

20 A I don't know as if I did.

21 Q But you pled guilty to robbing someone.

22 A Well, it seems pretty weird that someone would  
23 come up and say I tried to rob them when I didn't, don't  
24 you think?

25 Q I don't know.



1 But, in other words, are you telling us that  
2 you stood her -- was it in this courtroom?

3 A Yes, it was.

4 Q You were placed under oath just like you were  
5 now?

6 A Yes, I was.

7 Q Swore to the Court that you committed this  
8 robbery?

9 A Yes, I did.

10 Q But you can't remember whether you did so or  
11 not?

12 A True.

13 Q I suppose that you and Todd Willingham have  
14 been friends for a great many years?

15 A No.

16 Q You haven't been?

17 A No, we haven't.

18 Q You met him only when?

19 A Jail.

20 Q In jail this year. And do you remember when  
21 this year in jail?

22 A Between January 9th and January 30th.

23 Q You met him first in January?

24 A January or first of February.

25 Q And you were in the same cell with him, and you

1 were friends with him and talked to him every day?

2 A I was not in the same cell with him.

3 Q You were not in the same cell, but you talked  
4 to him for hours at a time, no doubt?

5 A Probably 30 minutes to an hour, yeah.

6 Q When? Once a day?

7 A Once or twice.

8 Q And in some hidden spot there of the jail where  
9 no one else could hear you?

10 A No. Anyone could have keyed a mike in on the  
11 telephone on the speaker system and heard exactly what I  
12 was saying.

13 Q This occurred under a speaker in the jail?

14 A Yes, it did.

15 Q The deputies could have heard?

16 A The deputies could have heard.

17 Q Anybody else in the cell could have heard?

18 A Not unless --

19 Q -- they were listening?

20 A Yes.

21 Q You see what I've drawn here on the board? You  
22 don't know what this is yet, do you?

23 A No, I don't.

24 Q Well, what this is meant to be is a drawing of  
25 the place where you say this conversation took place there

1 in the jail. This is meant to represent Cell Block 38,  
2 okay.

3 Is that any more familiar to you now? Do you  
4 recognize this as the small area outside the cell blocks?

5 A Yes, I do.

6 Q And right out here a few feet away is the  
7 control room where a deputy stays; isn't that right?

8 A Yes, it is.

9 Q And this is where you would go into this little  
10 area here to pick up trays and sweep up?

11 A Just sweep up. I never picked up trays.

12 Q You just go in there to sweep?

13 A Sweep and mop.

14 Q Okay. The deputies stay in this control room?

15 A Yes, he does.

16 Q And this is all glass right here, isn't it?

17 A Yes, it is.

18 Q And this is all glass, isn't it?

19 A Except for the metal.

20 Q Metal door?

21 A Yeah.

22 Q But there are no bars, right?

23 A No bars.

24 Q There is no solid steel doors in this area, is  
25 there?

1 A No, there's not.

2 Q Anybody standing anywhere out here or in these  
3 cells could see you standing here, couldn't they?

4 A Sure could.

5 Q And could see Todd standing there, right?

6 A Yes.

7 Q He's not in solitary confinement or anything,  
8 is he?

9 A No, sir, he's not.

10 Q There are three cells right here, aren't there?

11 A Yes, there is.

12 Q And this is the day room area with the table  
13 and television set, right?

14 A Yes, it is.

15 Q And during the day the prisoners in that cell  
16 block can come out there, wonder around, eat, watch TV,  
17 right?

18 A Right.

19 Q And same is true for this cell block and this  
20 cell block, true?

21 A True.

22 Q Everybody over here can see everybody over here  
23 if they are standing around the door, can't they?

24 A Yes, they can.

25 Q The deputies can see everybody all the time,

1 can't they?

2 A Sure can.

3 Q Because it's glass all the way through here and  
4 here, right?

5 A Yes, it is.

6 Q Wouldn't you agree that it was made so that the  
7 deputy could see everybody sitting from the control room?

8 A That's the purpose, yes.

9 Q And inside this room, this door shuts and  
10 locks, doesn't it?

11 A Yes, it does.

12 Q Inside this room there is an intercom, isn't  
13 there?

14 A Yes, there is.

15 Q The deputy in the courtroom (sic) can listen to  
16 every conversation in there, can't he?

17 A Yes, he can.

18 Q And what you are telling us is that Todd  
19 Willingham stood at this door and talked to you through  
20 the food tray slot, correct?

21 A Correct.

22 Q I want to show you a videotape of this area and  
23 ask you to tell us whether it is exactly the spot where  
24 you are saying you were, okay?

25 (Videotape playing)

1

2

BY MR. MARTIN:

3

Q Is that it? Is that the door?

4

A It may be -- yeah, that's it.

5

6

Q This is where you say you stood while this conversation was taking place, right?

7

A Yes.

8

Q Prisoners in here, right?

9

A Yeah.

10

Q Prisoners in here?

11

A Uh-huh.

12

13

Q All these food trays stay out all the time, don't they?

14

A Yes, they do.

15

Q Just like that?

16

A Just like that.

17

18

Q There's where Todd is locked up. There's other prisoners in there with him, correct?

19

A I would assume so.

20

21

Q Well, there were other people in there when you say you were talking to him, weren't there?

22

A I believe there was.

23

24

25

Q And so you are telling us that standing there at this food tray slot with these other people around, a person whom you did not know before you met them in jail

1 confessed to you that he had murdered his three children?

2 A True.

3 Q Told you all about those details that you  
4 described?

5 A Yes, he did.

6 Q And you were dumbfounded?

7 A I don't understand the word "dumbfounded".

8 Q You were shocked?

9 A Yes, I was.

10 Q You were surprised --

11 A Yeah.

12 Q -- that anybody would do such a bizarre thing?

13 A Yes.

14 Q First time it's ever happened to you? Someone  
15 confess to you?

16 A Yes.

17 Q Never happened before?

18 A Not with something like this, no.

19 Q You took some notes?

20 A No, I didn't take no notes.

21 Q Can you write?

22 A Yes, I can write.

23 Q And read?

24 A Yes.

25 Q You took no notes?

1 A (Shaking head negatively)

2 Q This conversation occurred over the course  
3 of -- what did you tell us -- two or three weeks?

4 A About a month.

5 Q Over a month's time?

6 A Yes.

7 Q Bits and pieces picked up over 30 days or so?

8 A No.

9 Q How did it happen?

10 A Well, I had been talking to him and he had been  
11 having --

12 Q Talking to him about what? Just --

13 A Everyday events, things. He was having a hard  
14 time sleeping and asked me if I would give him some of my  
15 medication. I said yes, I would.

16 Q And you did?

17 A Yes, I did.

18 Q Had it in your pocket?

19 A Yes, I did.

20 Q Is it sleeping pills?

21 A Yes, it is.

22 Q Is that the only kind of medication you had?

23 A No, it's not.

24 Q You had some other medication on you?

25 A Yes.



1 Q And the people of the jail just let you wonder  
2 through the jail with medicine in your pocket?

3 A No, they don't.

4 Q But you had it with you?

5 A Yes.

6 Q Weren't supposed to?

7 A Wasn't supposed to.

8 Q How did you get it?

9 A Through the nurse.

10 Q Was she supposed to give it to you?

11 A Yes, she was.

12 Q What were you supposed to do with it?

13 A Take it.

14 Q Take it and put it up?

15 A No. Take it by mouth.

16 Q But you didn't?

17 A Yes.

18 Q You just stuck it in your pocket?

19 A Not all of it. I would give him, like, one  
20 pill every now and then to help him sleep because he said  
21 he was having a real hard time sleeping. He was telling  
22 me about the case the whole time, but he was always  
23 telling me that he didn't do it. Then one day, mainly, he  
24 just broke down and said, "I done it."

25 Q Cried, no doubt?

1           A     Yeah.

2           Q     And everybody could see him there crying,  
3     confessing to you?

4           A     No. There was no one at the other doors.

5           Q     Everybody was --

6           A     -- watching TV.

7           Q     Okay. And the television, as I recall, in this  
8     cell block is about right here?

9           A     Yes, it is.

10          Q     And the television in the other day rooms is  
11     always up near the front, isn't it?

12          A     No. It's about middle-ways of the wall back.

13          Q     Back down here somewhere?

14          A     No. On this other one.

15          Q     We will watch the tape again in a minute see if  
16     we can see.

17                   No one else was in Todd's cell except him?

18          A     I don't remember. There might have been  
19     someone laying in there. I don't remember.

20          Q     So, in other words, he talks to you about it  
21     for 30 days, says he didn't do it. Then all at once, much  
22     to your surprise, he confesses?

23          A     True.

24          Q     You go back to your cell; you write down what  
25     he said?

1 A No.

2 Q You just remembered it?

3 A Yes.

4 Q This occurred when?

5 A About in April, I would imagine.

6 Q And then you told us that you told the  
7 deputy --

8 A Robert Chapman.

9 Q -- a month later?

10 A No. About a week later. A week later, but,  
11 you know, I told him I didn't want him to tell what I  
12 knew. He said that he wouldn't, and I kept talking to  
13 him. He said, "Well, man --" he says, "-- what are you  
14 going to do about that?" I said, "I don't know what to  
15 do. I really don't want to get involved in it." He said,  
16 "Yeah, but the man told you something that people really  
17 do need to know. I mean, if the dude done it, then you  
18 need to tell someone." You know, it got to bugging me.

19 Q But you slept on it for a week?

20 A Hum?

21 Q You didn't tell anybody for a week?

22 A No. Robert, that's it.

23 Q Okay. But for the first week after this  
24 supposed confession, you didn't say anything to anyone?

25 A No.

1 Q Didn't tell anyone at all?

2 A No.

3 Q Then a week later your conscience began to  
4 bother you?

5 A My conscience bothered me from the day he told  
6 me.

7 Q You told the deputy sheriff that somebody had  
8 confessed three murders to you, and he asked you what you  
9 were going to do about it?

10 A Well, you know, I considered him my friend. I  
11 said, "Look, can I tell you something without you telling  
12 anybody?"

13 Q And for three weeks this secret was kept  
14 between you and he?

15 A Yes, until he made the decision that it was the  
16 right decision. He just wanted me to do the right thing.  
17 That's what I tried to do.

18 Q You know Joe Jackson?

19 A Yes, I do.

20 Q He was in the cell with James McKnight? Do you  
21 know the FBI agent, Mike McKlusky? You know him, don't  
22 you? You know any FBI agents at all?

23 A No, I don't.

24 Q Mr. Webb, aren't you the same Mr. Webb that  
25 made a complaint to the FBI in May of this year that you

1 were being physically abused in the jail?

2 A No, I'm not.

3 Q You called the FBI --

4 A No, I did not.

5 Q -- in Dallas? They came down here to  
6 investigate?

7 A No, I did not.

8 Q You were interviewed by the FBI in May?

9 A No, I was not.

10 Q Not at all? That's not true, not any of it?

11 A No, sir, it's not.

12 Q You never made a complaint to the FBI?

13 A No, sir, I haven't.

14 Q Joe Jackson?

15 A He's a black guy that was in Cell 44.

16 Q It's around here?

17 A Yes, sir.

18 Q Where? Over here?

19 A No, next one.

20 Q Here?

21 A Right there.

22 Q And how long was Joe in there?

23 A I don't know, four, five months, maybe longer.

24 I can't remember.

25 Q How did you know him, just like you did Todd?

1           A       Just came around. You know, they ask us for  
2       bleach to clean their showers. We give them the stuff.  
3       That's about it.

4           Q       How did you learn his name?

5           A       Well, I've known him before from jail. I've  
6       been there. I know who he is.

7           Q       This wasn't the first time you met him?

8           A       No, it wasn't.

9           Q       Now, presently, you are under a sentence of 15  
10      years to do in the penitentiary?

11          A       True.

12          Q       Is that aggravated or non-aggravated?

13          A       Aggravated.

14          Q       How much time do you understand that you will  
15      stay at minimum in the penitentiary?

16          A       Three years, nine months.

17          Q       And when were you sentenced to that?

18          A       Sometime either in late January or early  
19      February.

20          Q       Do you know why you are still here?

21          A       Basically, no, I don't. I think to testify on  
22      this, but I'm not sure.

23          Q       You should have gone to the penitentiary before  
24      now, but you you've been held over to testify here?

25          A       Not necessarily. There's another person in

1 jail that's got 35 years aggravated. He's been there 18  
2 months. They are not really rushing to get anybody with  
3 aggravated time out because they got so much time to do.

4 Q Would you tell us what the symptoms of your  
5 mental problems have been? Depression?

6 A Yes.

7 Q Loss of sleep?

8 A Yeah, I've lost a lot of sleep.

9 Q Mental confusion?

10 A I wouldn't say mental confusion.

11 Q You mean, you don't know that you robbed  
12 somebody, but you are not mentally confused?

13 A I think I was so blitzed on drugs, you know, I  
14 blacked out.

15 Q And how long have you been on medication?

16 A Two years.

17 Q Continuously for two years?

18 A Not continuously.

19 Q Just off and on?

20 A Off and on.

21 Q Have you been on medication for your mental  
22 problems the entire time you've been in jail?

23 A Yes, I have.

24 Q Been taking medicine every day for the entire  
25 time you've been in jail?

1 A Yes, I have.

2 Q It was prescribed to you by the jail nurse?

3 A By the jail doctor.

4 Q Who is that?

5 A Barnaby.

6 Q Can you tell us how many times you've been  
7 interviewed by the prosecutors in this case?

8 A As in who?

9 Q Mr. Jackson, Mr. Bristol, mister --

10 A I've been interviewed about four times.

11 Q Did you ever make any notes about any of it?

12 A No.

13 Q Can you tell us when you are expecting to go to  
14 prison?

15 A I expect to go whenever they make a list and  
16 put my name on it.

17 MR. MARTIN: Pass the witness.

18 REDIRECT EXAMINATION

19 BY MR. JACKSON:

20 Q Johnny, I believe you told Mr. Martin that this  
21 defendant was having a hard time sleeping; is that right?

22 A Yes, it's true.

23 Q He told you why he was having a hard time  
24 sleeping, didn't he?

25 MR. MARTIN: Object. Leading.



1 THE COURT: Overruled.

2 THE WITNESS: Yes, he did.

3 Q He told you he killed his children, didn't he?

4 A Yes, he did.

5 Q He told you he needed your sleeping medication  
6 to sleep; is that right?

7 A True.

8 Q You understand there's going to be lots of  
9 problems for you associated with giving this testimony,  
10 don't you?

11 A I'm well aware of that fact.

12 Q What happens to people who give this type of  
13 testimony in your situation?

14 MR. MARTIN: Your Honor, we object to  
15 that as calling on the witness to speculate to things.  
16 Irrelevant. No personal knowledge.

17 MR. JACKSON: Let me rephrase that.

18 BY MR. JACKSON:

19 Q Do you have personal knowledge of people who  
20 have given information about fellow inmates?

21 A Not really.

22 Q You have information of what's happened to you  
23 after you've given information about fellow inmates, don't  
24 you?

25 A Yes, sir.

1 Q What has happened to you?

2 MR. MARTIN: We object to that as being  
3 irrelevant.

4 THE COURT: I overrule the objection.

5 THE WITNESS: My life has been threatened  
6 as well as my family's life. And if I make it to the  
7 penitentiary, then I'm going to be in deep trouble.

8 Q Who has threatened you, Mr. Webb?

9 A Two people, sir. Robert Lyles and Todd  
10 Willingham.

11 Q What did Mr. Willingham say he would do?

12 A He just pointed his finger at me. He did like  
13 this.

14 MR. JACKSON: Let the record show, Your  
15 Honor, that the witness has drawn a his finger across his  
16 neck.

17 THE COURT: The record will so reflect.

18 BY MR. JACKSON:

19 Q Mr. Webb, you gave a written statement to a  
20 deputy sheriff in this case, I believe; is that correct?

21 A True.

22 Q In that written statement, I believe you said  
23 Todd Willingham told you --

24 MR. MARTIN: Your Honor, we object to  
25 this as an improper attempt to bolster the witness'

1 statements.

2 MR. JACKSON: The credibility of this  
3 witness has been substantially attacked during  
4 cross-examination. I think I'm entitled to do that.

5 THE COURT: Rephrase your question, Mr.  
6 Jackson.

7 BY MR. JACKSON:

8 Q Did Todd Willingham tell you he poured lighter  
9 fluid on the children's floor of the children's room in an  
10 X pattern?

11 A Yes, he did.

12 Q Did he tell you he removed one of the children  
13 to a different location in the house?

14 A No, I don't think he said that.

15 Q Okay. You made a statement at an earlier time,  
16 I believe --

17 MR. MARTIN: We object to this again as  
18 an improper attempt to bolster the witness. It's also  
19 leading.

20 THE COURT: Overrule the objection

21 BY MR. JACKSON:

22 Q I believe you said at one point he said he  
23 moved one of the kids from one room to another; is that  
24 right?

25 MR. MARTIN: May the record reflect that

1 the prosecutor is showing the witness a piece of paper.

2 THE COURT: Yes, sir.

3 MR. MARTIN: May we know for the record  
4 what the prosecutor is showing the witness?

5 MR. JACKSON: I will be happy to offer it  
6 at any point you choose, Mr. Martin.

7 MR. MARTIN: I'm not offering it.

8 BY MR. JACKSON:

9 Q In that statement you said, "He then moved one  
10 of the kids from one room to another, then started the  
11 fire in the hallway." Would that be a fair statement?

12 A Yes, I believe it would.

13 Q Are you scared of Todd Willingham?

14 A Scared of what could happen through the people  
15 he knows, yes.

16 MR. JACKSON: Pass the witness.

17 RECROSS-EXAMINATION

18 BY MR. MARTIN:

19 Q Now, Mr. Webb, you told us twice that Todd  
20 didn't say anything to you about taking one of the  
21 children to another room; and then when the prosecutor  
22 showed you the script, you changed your mind. Now, which  
23 one is it?

24 A I think he said -- you know, I can't remember  
25 exactly; but I think that's probably right.

1 Q After being reminded by Mr. Jackson of what you  
2 said in the script he showed you, right?

3 A Not just that. It's just, you know, that's  
4 probably right.

5 Q Now, when Todd supposedly told you this, you  
6 didn't think too much about it, did you?

7 A At first, no. It stunned me. I didn't really  
8 know what to think.

9 Q Well, you said in the past that you didn't  
10 think too much about what he told you, did you?

11 A I don't believe I've made that statement.

12 Q Well, let me show you what Mr. Jackson showed  
13 you that he provided me. Didn't you say, "In the past at  
14 first I did not think too much about what Todd told me?"

15 A Probably, yeah.

16 Q You said that, didn't you?

17 A Yes, I did.

18 Q Now, are you swearing to this jury that you  
19 never made a complaint to the FBI about being abused in  
20 jail?

21 A I have never been abused in jail.

22 Q Are you swearing that you did not complain to  
23 the FBI this year that you had been abused in jail?

24 A I have never complained to the FBI.

25 MR. MARTIN: Pass the witness.

## 1 FURTHER DIRECT EXAMINATION

2 BY MR. JACKSON:

3 Q Johnny, has Mr. Martin said anything that would  
4 make you doubt your testimony here this morning?

5 A No, sir.

6 Q Does it remain your testimony that Cameron  
7 Willingham said he killed his children?

8 A Yes, it does.

9 MR. JACKSON: Pass the witness.

10 MR. MARTIN: No further questions.

11 THE COURT: You may step down,  
12 Members of the jury panel, at this time we are going  
13 to take about a ten-minute recess.14 It's very important to continue to remember the  
15 instructions previously given everybody with reference to  
16 conversation among yourselves or with anyone else.17 If you happen to -- if you run into some of the  
18 people in the audience outside the courtroom, if you are  
19 outside the courtroom, if anyone attempts to talk to you  
20 about this case, you need to let me know about it at once,  
21 okay.

22 You can go in the jury room.

23  
24 (Recess)  
25

# **APPENDIX 2**

NO. 24490-CR

THE STATE OF TEXAS

VS.

JOHNNY E. WEBB

IN THE DISTRICT COURT

OF

NAVARRO COUNTY, TEXAS

**STIPULATION OF EVIDENCE**

Comes now Johnny E. Webb, the Defendant in the above entitled and numbered cause, in writing and in open court, and consents to the stipulation of the evidence in this case and in so doing expressly waives the appearance, confrontation and cross examination of witnesses. I further consent to the introduction of testimony by affidavits, written statements of witnesses, and other documentary evidence. I further consent and agree to any other stipulations appearing of record herein. Accordingly, having waived my Federal and State constitutional right against self-incrimination and after having been sworn, upon oath, I judicially confess to the following facts and agree and stipulate that these facts are true and correct and constitute the evidence in this case.

Said Defendant in person together with his counsel and the attorney representing the State of Texas agrees and stipulates that he, the said Defendant, is the identical person referred to in the stipulated evidence herein, and if the witnesses herein mentioned were present and testifying under oath they would identify the defendant as the person of whom they speak in said stipulations.

I, the Defendant in this case, judicially confess to the following facts and agree and stipulate that these facts are true and correct and constitute the evidence in this case:

On the 1st day of January, 1992, in Navarro County, Texas, I did then and there while in the course of committing theft, and with intent to obtain property of Shirley McAdams, to wit: a purse, without the effective consent of the said Shirley McAdams, the owner thereof, and with intent to deprive the said Shirley McAdams of said property, I did then and there intentionally and knowingly place Shirley McAdams in fear of imminent bodily injury by using and exhibiting a deadly weapon, to wit: a knife. I further agree that I am one and the same

State's Exhibit #1

CERTIFIED A TRUE COPY

MARILYN GREER

DISTRICT CLERK, NAVARRO COUNTY, TEXAS

ATTEST: RECEIVED

BY [Signature] DEPUTY

PAGE ONE OF TWO

FILED  
MAR 08 1992

[Signature]  
CLERK, DISTRICT COURT, NAVARRO COUNTY, TEXAS



person named in the indictment in this case, and that all allegations contained therein are true and correct.

Johnny E. Wicks  
Defendant

SWORN TO AND SUBSCRIBED before me on this 6 day of March, 1992.

Michelle Schwartzlander  
District Clerk  
Navarro County, Texas

THIS PAGE, AND ALL PRECEDING PAGES OF THIS STIPULATION, ALL UNDER ONE BLUEBACK COVER, APPROVED:

Johnny E. Wicks  
Defendant

April A. Sikes  
Attorney for Defendant

[Signature]  
Attorney for State

[Signature]  
District Judge

# **APPENDIX 3**

## THE COHEN LAW FIRM

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GARY J. COHEN  
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TDCJ / Parole Division 1991-1998  
Board of Pardons and Paroles / Hearing Officer  
Administrator 1993-2005

CAMILLA SANDA  
Paralegal

11 February 2014

The Texas Board of Pardons and Paroles  
8610 Shoal Creek Blvd.  
Austin, Texas 78757

RE: Posthumous Pardon Application for Cameron Todd Willingham

Dear Board Members:

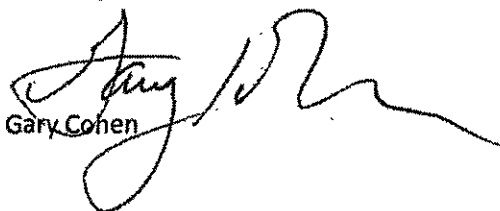
I am writing at the request of counsel for Petitioners in the above referenced matter to provide my opinion regarding parole consequences of Johnny Webb's conviction for an Aggravated Robbery committed on or about January 1, 1992. I have reviewed the records regarding this crime that show that Mr. Webb pled guilty to an Aggravated Robbery that involved the use of a Deadly Weapon; to wit, a knife.

An offender convicted of Aggravated Robbery, a first degree felony, in 1992 would have been required to serve twenty-five (25%), calendar time, of his sentence before becoming eligible for parole consideration. Thus, Mr. Webb, who was sentenced to fifteen (15) years confinement for the offense of Aggravated Robbery, would have been required to serve three years and nine months before becoming parole eligible.

A review of the transcript of Mr. Webb's testimony reveals that to have been his understanding as well. Mr. Webb testified in 1992 that he was in fact convicted of an aggravated offense and that he would have to serve three years and nine months before becoming parole eligible. This testimony is consistent with the law in effect at the time of his commission of the offense of Aggravated Robbery, a first degree felony. If Mr. Webb had pled guilty to the lesser included offense of Robbery, a second degree felony, his parole eligibility calculation would have been based upon a combination of calendar time served, plus earned good time credits. With the good time credits factored into the equation, he would have been eligible for release to parole supervision in approximately half the time.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Gary Cohen

# **APPENDIX 4**

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TRANSCRIPT OF INTERVIEW  
Johnny Webb

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Transcribed by: Paige S. Watts  
CSR No. 8311  
Job No. 187953

24

25

1 (Audio file begins)

2 MR. HINTON: Needs as much help as  
3 possible. Let me explain to you who I am, and why I'm  
4 here. I got a call from your lawyer a couple, three  
5 weeks ago I guess it was and he said are you involved in  
6 looking into this Willingham matter and I said, yes, I  
7 am. He said, I've got some things I want to share with  
8 you with the permission of my client, Johnny Webb, and I  
9 wanted to let you know this because it's interesting  
10 information that you might need or want to have.

11 And it was very nice of him to call, and  
12 we've talked several times since then. I'm not here to  
13 help you. I'm not here to do anything except find out  
14 what the truth is. I don't know if it will ever help  
15 you, and it could very well hurt you. I don't know.  
16 But I want to make sure that we understand up front that  
17 you understand I'm not here to help you.

18 MR. BILTZ: I'm your lawyer.

19 MR. HINTON: Yeah.

20 MR. BILTZ: I'm the only one you enjoy  
21 the attorney-client privilege with. Okay?

22 MR. HINTON: Yeah.

23 MR. BILTZ: And that's what he's trying  
24 to tell you. He's not here coming working as your  
25 lawyer on this aggravated assault case. I'm the only

1 lawyer on that.

2 MR. HINTON: Right.

3 MR. BILTZ: He may be able to offer you  
4 some things that will advance our interest if we should  
5 so determine if they are in our interest, okay, which  
6 brings us to what this is here. This authorization --  
7 remember all the stuff we're trying to run down? If you  
8 want some assistance in getting our records from the  
9 Ocean Corporation, from the college, from TDC, all the  
10 records that we're wanting to get that we're running  
11 down, they will -- with your permission -- help  
12 facilitate the search for these records that we need and  
13 that's what this document is. It's saying that you  
14 understand -- that you give them permission to get  
15 documents related to -- related to your incarceration at  
16 TDC,J, Board of Paroles, Joseph Porto.

17 Okay, now let's talk about -- you know  
18 Joseph?

19 MR. WEBB: Uh-huh.

20 MR. BILTZ: He's your Houston lawyer,  
21 right? That's the guy. Would it be okay if we said,  
22 "Hey, Joe, we want to get the records? Like we were  
23 discussing, we want Johnny's payment records and payment  
24 history and payment stubs, all that stuff." Okay.  
25 Who's Roland Moore?

1 MR. HINTON: Roland Moore is in Joe  
2 Porto's office.

3 MR. BILTZ: Oh, okay.

4 MR. HINTON: Or he was at that time. Joe  
5 Porto is now an Assistant United States Attorney in the  
6 Southern District of Texas.

7 MR. BILTZ: Oh, that's right. Okay,  
8 okay.

9 MR. HINTON: But one of the court  
10 settings that we saw evidence of in Harris County, he  
11 signed on in place of Joe Porto.

12 MR. BILTZ: Okay.

13 MR. HINTON: He was there instead of Joe  
14 Porto. I don't know if --

15 MR. BILTZ: It must have been his  
16 associate or something.

17 MR. HINTON: Something like that.

18 MR. BILTZ: Okay.

19 MR. HINTON: This --

20 MR. WEBB: Well, you shouldn't want to go  
21 through it. It may hurt me.

22 MR. HINTON: Well, I mean here's the  
23 situation. What you have told your lawyer and what he  
24 has told me, I -- we want to make sure that we can  
25 corroborate everything and if we are able to corroborate



1 things, it very well may set off a very volatile  
2 situation here in our county.

3 MR. WEBB: I know it will.

4 MR. HINTON: Yeah, it will. And I wanted  
5 to make sure that you understood from the get-go there  
6 may not be anything good to come of it for you. Maybe  
7 something bad come of it for you. Maybe something good  
8 come of it for you. But all I'm concerned with is  
9 getting to the truth of some matters that I believe if  
10 we're able to corroborate things that you have brought  
11 up to your lawyer and you've authorized him to share  
12 with me, I think that's going to create a situation that  
13 will eclipse a much larger than an aggravated assault on  
14 Johnny Webb.

15 MR. WEBB: Well, this is my concern and  
16 this is my only concern. What criminal responsibility  
17 do I have in Federal court?

18 MR. HINTON: It depends on what direction  
19 this thing takes. We are confident that on a proffer,  
20 if we get to the point of corroboration and we approach  
21 the United States Attorney's Office on this with a  
22 proffer of testimony, we expect that they would see the  
23 reason behind granting you immunity. I can't grant you  
24 immunity. The United States Attorney's Office can or  
25 the Court can through the United States Attorney's

1 Office and I expect that would be the case because if  
2 that were not the case, then this would end because  
3 you're not -- your lawyer is not going to allow you to  
4 get into a situation where you're going to be giving  
5 evidence that would incriminate you. It may incriminate  
6 you, but that would cause you to have -- to suffer.

7 MR. WEBB: This is the thing. I've been  
8 wanting to come forward with this for a number of months  
9 now. I mean for a long, long time about certain  
10 specific things that no one's ever known. You know, I  
11 really wanted to come forward. This has been something  
12 that's pretty much destroyed my life for 22 years.

13 MR. HINTON: Uh-huh.

14 MR. WEBB: And the thing is, is 20 months  
15 ago when I first got that misdemeanor charge, I told  
16 Mike Crawford then, I said, Man, you know, all this --  
17 the only reason these people are putting these charges  
18 on me -- because one faction wants to keep it quiet.  
19 Another faction wants to bring all them and, you know,  
20 try to find out the truth.

21 MR. HINTON: Uh-huh.

22 MR. WEBB: I'm stuck in the middle.

23 MR. HINTON: Yeah.

24 MR. WEBB: So it's like two bullies  
25 trying to fight over the block's corner, and I'm the

1 block's corner.

2 MR. BILTZ: Johnny, here's what --  
3 what -- our concerns would be this, I believe. Is in  
4 terms of any State charges, we're good. Federal  
5 charges, not to much so. I'm not going to put you in a  
6 position where anything that you say could incriminate  
7 you until we have some guarantees of immunity from the  
8 Feds. Now that does not mean that we can't go ahead and  
9 get the ball rolling. I'm not asking you to necessarily  
10 make statements that if you'll authorize these guys to  
11 do some of the legwork, then --

12 MR. WEBB: There's one thing on here that  
13 y'all left out that I can see right off the bat and  
14 that's the Federal complaint that I filed. I had the  
15 FBI come and see me on Eastham Unit because I made a  
16 call from right here in this County Jail before this  
17 trial ever happened and told the FBI, look, they're  
18 forcing me to testify against this dude.

19 MR. HINTON: Well, I didn't know that.

20 MR. WEBB: And I don't want to do it.  
21 And he says, well, I can't really do anything over the  
22 phone, sir; but I'll send an agent to see you.

23 I was then convicted. I was then put on  
24 trial and made to testify against Willingham and then  
25 they didn't come and see me until I was already on the

1 Eastham Unit in '93.

2 MR. BILTZ: And they came to see you --

3 MR. WEBB: Yes, sir.

4 MR. BILTZ: Okay.

5 MR. WEBB: I mean I had told them, I even  
6 made statements in trial that I didn't want to testify  
7 against that dude and I didn't.

8 MR. JOHNSON: The FBI came after the  
9 trial?

10 MR. WEBB: Uh-huh. I mean I told them  
11 then, I said they're forcing me to testify on this man  
12 and I don't want to do this.

13 MR. HINTON: Well, let me ask you. You  
14 said that you said on the record in a court something to  
15 the effect that I don't want to testify?

16 MR. WEBB: Uh-huh.

17 MR. HINTON: What record?

18 MR. WEBB: Willingham's trial.

19 MR. BILTZ: So during the trial, he said  
20 I don't even want to be here testifying.

21 MR. WEBB: I said I never wanted to  
22 testify on this man to begin with.

23 MR. BILTZ: But you went ahead and  
24 testified basically?

25 MR. HINTON: Was it out of the presence

1 of the jury that you said that? In the presence of the  
2 jury?

3 MR. WEBB: I told them I didn't want to  
4 test -- there's records of that.

5 MR. HINTON: Well, I don't have the  
6 transcript.

7 MR. BILTZ: Yeah, I don't either.

8 MR. HINTON: I've only got this part of  
9 the transcript.

10 MR. WEBB: I promise you I said that.

11 MR. BILTZ: And, Johnny, another detail I  
12 want you to share, remember how you told me after John  
13 brings you over there and starts sharing some of the  
14 file -- describe some of the things that John Jackson  
15 showed to you.

16 MR. WEBB: Sure. Pictures of the kid's  
17 arm that was burnt. He showed me pictures of the inside  
18 of the house.

19 MR. HINTON: Well, let me start this.  
20 You explained to the FBI -- were there two FBI agents?

21 MR. WEBB: One.

22 MR. HINTON: One, okay. In '93, all  
23 right. Let me start back at the beginning.

24 MR. WEBB: Okay.

25 MR. HINTON: When was it that you -- you

1       were born and raised here in Corsicana, right?

2                   MR. WEBB: Uh-huh.

3                   MR. HINTON: When was it that you became  
4       aware of Chuck Pearce?

5                   MR. WEBB: Back when -- it was a while  
6       back, I guess. I don't remember.

7                   MR. BILTZ: Pre Willingham?

8                   MR. WEBB: Yeah, it was pre Willingham;  
9       but it was due to the fact Chuck Pearce's house was used  
10      investigators -- well, by the narcotics division to hold  
11      meetings at his house and to go over who they were going  
12      to issue search warrants for, who they needed help with  
13      getting search warrants. So there was people that Chuck  
14      Pearce were helping, so to speak, for the police.

15                  MR. HINTON: And how do you know that?

16                  MR. WEBB: Because I was one of them.

17                  MR. HINTON: Okay, all right.

18                  MR. JOHNSON: You were working as a  
19      confidential informants --

20                  MR. WEBB: Sure.

21                  MR. JOHNSON: -- at that point?

22                  MR. WEBB: Well, I mean not really a  
23      confidential informant. They would just tell me --

24                  MR. JOHNSON: (Inaudible).

25                  MR. WEBB: -- you've seen this at this

1     guy's house and we need you just to say this and then I  
2     would say, okay, I've seen it. Matter of fact, I can  
3     even tell you the people's house that I remember. One  
4     of them was Doug Martin's house. They didn't have an  
5     informant and they had to have me and I said, yeah, I  
6     know him and they said, well, all we need you to do is  
7     say that you've seen a green leafy substance in his  
8     house and issued the warrant.

9                   MR. BILTZ: And what other Barnett guys  
10     or the other guys that did this did you know about?

11                   MR. HINTON: They're from Kerens.

12                   MR. BILTZ: What are their names?

13                   MR. WEBB: Kyle Barnett and Kevin Barnett  
14     and they would take care of them. So I mean Mr. Pearce  
15     helped all of us. He paid for things because it was all  
16     at the direction of John Jackson and the detectives here  
17     in (inaudible) county.

18                   MR. HINTON: Well, did John -- was John  
19     Jackson ever at one of those meetings that you attended  
20     at Mr. Pearce's house?

21                   MR. WEBB: I believe he was.

22                   MR. HINTON: All right. Now --

23                   MR. WEBB: It was all the big narcotics.  
24     I mean it was the DA. It was quite a few people at  
25     Mr. Pearce's house. I mean that's -- that's --

1 MR. HINTON: Do you remember the name of  
2 the DA?

3 MR. WEBB: It's been a long time ago.

4 MR. HINTON: Well, it was a long time ago  
5 and I understand that. The Willingham trial was in '92.

6 MR. WEBB: I just remember being at  
7 Mr. Pearce's house a couple times and all these  
8 narcotics agents are there and, you know, it was always  
9 a pat on back, you're going to help us out and, you  
10 know, we're going to take care of you.

11 MR. HINTON: And this is pre Willingham?  
12 So it was pre '92. Would it have been -- let's see.  
13 You were born in '70, so you would have been 22 in '92.  
14 So would this have been when you were -- before you were  
15 20 or between 20 and 22?

16 MR. WEBB: It would have been before I  
17 was 20.

18 MR. HINTON: Before you were 20?

19 MR. WEBB: Uh-huh.

20 MR. HINTON: Okay. How did they know  
21 about you, if you know?

22 MR. WEBB: Kyle Barnett. I knew Kyle and  
23 Kyle was already involved with Mr. Pearce.

24 MR. HINTON: All right. Was --

25 MR. WEBB: Kyle kind of brought me in.



1 MR. HINTON: All right. Was Kyle a --  
2 was Kyle a guy that --

3 MR. WEBB: Used drugs, man.

4 MR. HINTON: Used drugs, okay. Was that  
5 pretty much the common thing, the common denominator?  
6 Did you use drugs back then?

7 MR. WEBB: Sure.

8 MR. HINTON: So you're saying that the  
9 law enforcement narcotics departments, Sheriff's  
10 department -- would it be Sheriff and the Police  
11 Department? They were using Chuck Pearce's house to  
12 have meetings to talk to people like the Barnett  
13 brothers and you about what you could tell them that  
14 could cause them to get search warrants issued on --

15 MR. WEBB: Not just what we could tell  
16 them. They would basically tell us we don't have an  
17 informant. We just need you to say you know them.

18 MR. HINTON: All right. And you would --  
19 you would cooperate with them?

20 MR. WEBB: And just say (inaudible)  
21 couple of them I did know that I remember.

22 MR. HINTON: What did you get in return  
23 for that?

24 MR. WEBB: Some new shoes, clothes,  
25 whatever I needed.

1 MR. HINTON: Who would pay for it?

2 MR. WEBB: Mr. Pearce.

3 MR. HINTON: Okay.

4 MR. WEBB: That was the whole common  
5 denominator. Pearce was the money source. He helped  
6 out everybody and the police, you know, he just was  
7 there friend I guess. I don't know what his role with  
8 them was. I just know what his role with us was.

9 MR. HINTON: So Doug Martin is somebody  
10 that you remember that you gave information that was  
11 false about?

12 MR. WEBB: Uh-huh, and --

13 MR. HINTON: Did it lead to his arrest?

14 MR. WEBB: I don't know if it did or  
15 didn't.

16 MR. HINTON: Okay.

17 MR. WEBB: I mean I wasn't informed and  
18 another one was James Selman and I know it lead to his  
19 arrest.

20 MR. JOHNSON: James -- what is the last  
21 name?

22 MR. WEBB: Selman.

23 MR. JOHNSON: Helman?

24 MR. HINTON: Selman.

25 MR. JOHNSON: Selman, okay.

1 MR. HINTON: Okay.

2 MR. JOHNSON: How many of these meetings  
3 were there that you had at Mr. Pearce's house?

4 MR. WEBB: When I'd actually seen him  
5 there?

6 MR. HINTON: That you were actually at  
7 Mr. Pearce's house before Willingham.

8 MR. WEBB: Maybe one or two. Not many.  
9 I mean they didn't -- they just didn't, you know, allow  
10 people. They didn't allow a lot of people around. I  
11 mean that's just the way it was.

12 MR. JOHNSON: But you went to a couple of  
13 meetings and --

14 MR. WEBB: No, I was just there when they  
15 showed up. I wasn't like -- I didn't come there when  
16 they were already there. It was just like they started  
17 showing up and they went in the house and did their  
18 thing and they would come out after they had had their  
19 meeting. It's not like I was a privy to what was going  
20 on. They'd say, hey, man, you know, you need -- we need  
21 these, we need these search warrants, and we need  
22 someone to help us with it.

23 MR. HINTON: Johnny, how did you -- how  
24 did you get to Mr. Pearce's house? I mean did he call  
25 you? Did --

1 MR. WEBB: Pick us up.

2 MR. HINTON: He would come pick you?

3 MR. WEBB: Uh-huh, my mom remembers  
4 everything.

5 MR. HINTON: All right. And we want to  
6 talk to your mom --

7 MR. WEBB: That's fine.

8 MR. HINTON: -- if we can this afternoon  
9 before we leave here.

10 MR. BILTZ: She's at work today.

11 MR. HINTON: Yeah, that's okay.

12 Mr. Johnson and I are from Dallas. We're not far away.  
13 Just a little bit about me, I've been practicing law for  
14 a long time. You were three when I started practicing  
15 law and I was a prosecutor for 40 years, a little over  
16 40 years, and then I've been on the defense side of it  
17 since then. So all in the world that I care about is  
18 getting to the truth.

19 MR. WEBB: Okay.

20 MR. HINTON: What you have told your  
21 lawyer and what he -- you authorized him to tell me,  
22 we've checked on some of that stuff so far and to this  
23 point, we have found nothing that would contradict what  
24 you've said.

25 MR. WEBB: I know because I'm telling you

1 the truth.

2 MR. HINTON: What we found out yesterday  
3 is that back in -- and I'm kind of getting ahead of  
4 myself. Back in '92 when you went to TDC on that agg  
5 robbery case, when somebody would put money on your  
6 commissary account, they would have to do it by filling  
7 out a little form.

8 MR. WEBB: Sure.

9 MR. HINTON: And part of what this is all  
10 about, this release, is so that we can ask the TDCJ to  
11 give us copies of whatever they still have about that.  
12 It's going to be very important for us to be able to  
13 corroborate everything that you say. You know, when  
14 you're dealing with somebody who has a history of saying  
15 something and then saying, no, that's not right and back  
16 and forth and back and forth, we have to do what we can  
17 to corroborate everything that you say that we can  
18 possibly corroborate to give you some creditability  
19 because you don't have any.

20 MR. WEBB: I know.

21 MR. HINTON: So that's what we've got to  
22 do, and that's all we're interested in is getting to the  
23 truth. I'll tell you right now, John Jackson is a  
24 friend of mine, a good friend of mine. I've tried a lot  
25 of cases against John when he was first Assistant DA and

1 I've tried cases in front of him both as a special  
2 prosecutor and as a defense lawyer when he was a judge,  
3 but I've got to set that aside when I've got an  
4 assignment to try to find out what the truth is. It's  
5 important for us to be able to do that. The release,  
6 you don't have to sign. You can mark it up, do anything  
7 you want to do. I'll add on there FBI before you sign  
8 it if you decide to sign it. But that is meant to try  
9 to give us the opportunity to corroborate everything we  
10 can about you. What you're saying, Johnny, is really  
11 serious.

12 MR. WEBB: I know it is.

13 MR. HINTON: It's really serious. It is  
14 an indictment of law enforcement in Navarro County.

15 MR. WEBB: I know.

16 MR. HINTON: A lot of good people  
17 involved in this. A lot of good people. And a lot of  
18 good people who probably, if we're able to corroborate  
19 what you're saying, thought they were doing the right  
20 thing; but it's not the right thing.

21 MR. WEBB: They didn't think they were  
22 doing the right thing.

23 MR. BILTZ: Do you think Chuck knew?

24 MR. WEBB: I don't think Chuck knew, no.  
25 I don't -- Chuck wasn't -- I don't know, man.

1 Mr. Pearce is such a nice guy.

2 MR. BILTZ: He's the kind of guy that  
3 would help anybody. But if he was setting up these  
4 meetings with narcs at his house before the Willingham  
5 deal --

6 MR. WEBB: I just know I -- no, I mean I  
7 don't mind telling y'all everything you want to know  
8 because I know in the end they're going to end up  
9 killing me.

10 MR. BILTZ: Well, not if -- not if I do  
11 my job.

12 MR. HINTON: I don't -- you may be the  
13 safest person on the planet.

14 MR. WEBB: But my wife, man, she's  
15 getting beat up over there right now.

16 MR. BILTZ: Over here in our jail?

17 MR. WEBB: I done showed you them  
18 letters, man. She got beat up, and these people here  
19 won't do nothing about it. I told them, look, why are  
20 y'all letting this -- why are y'all letting people beat  
21 my wife up because of that paper article that came out  
22 about the Willingham case because they call her, you  
23 know, the wife of a snitch now.

24 MR. BILTZ: So do I need to have her put  
25 in protective custody, too?

1 MR. WEBB: I would imagine.

2 MR. HINTON: All right.

3 MR. BILTZ: Well, let's get (inaudible)  
4 here.

5 MR. HINTON: Okay. We only have about 30  
6 more minutes, and we can all get together again; but it  
7 is the first -- the first round we needed to introduce  
8 ourselves to you and I wanted you to feel comfortable  
9 with me. I want you to be able to understand what our  
10 role is. Our role is not help Johnny Webb. Our role is  
11 not to hurt Johnny Webb. Our role is to find out what  
12 we can to corroborate what you're saying because that's  
13 an important deal.

14 All we're concerned about is being able  
15 to get to the truth and corroborate it. Now when you  
16 got arrested on this agg robbery, did you know John  
17 Jackson by the time that you got arrested on the agg  
18 robbery on January the 1st? You didn't know who he was?

19 MR. WEBB: I mean I kind of knew who he  
20 was, but I didn't know him know him. Not like I do now.

21 MR. HINTON: Well, at any -- at either  
22 the one or the two times pre Willingham that you were at  
23 Mr. Pearce's house, do you really remember whether or  
24 not John Jackson was there? And it doesn't matter if --

25 MR. WEBB: I want to say I do, but --



1 MR. HINTON: But you know --

2 MR. WEBB: -- it's been so far, no, I  
3 don't.

4 MR. HINTON: Okay. Well, that's fine.  
5 That's fine. Now April Sikes was your lawyer in the agg  
6 rob case, correct?

7 MR. WEBB: Uh-huh.

8 MR. HINTON: And she was court appointed?

9 MR. WEBB: Uh-huh.

10 MR. HINTON: Answer out loud. We're  
11 recording this.

12 MR. WEBB: Okay.

13 MR. HINTON: She was court appointed.  
14 Before you pled guilty, I believe that was in March of  
15 two thousand -- 1992. You waived indictment and you  
16 signed a stipulation of evidence and a plea deal for 15  
17 years on the agg rob with the knife.

18 What did April ever tell you about any  
19 deal that you -- she had worked out with you with John  
20 Jackson, the prosecutor, in exchange for your help and  
21 testimony in the Willingham case?

22 MR. WEBB: She said I was either going to  
23 do what she said do and I was going to take the 15 or  
24 they was going to jack it up to 99 years.

25 MR. HINTON: And do what you were going

1 to do meant what?

2 MR. BILTZ: Take the 15?

3 MR. WEBB: Take the 15 and testify, or  
4 you're going to do life.

5 MR. HINTON: Okay. How is it that you  
6 first -- after you're in jail March of 1992, how is it  
7 that you came to ever have the first conversation about  
8 Willingham with John Jackson?

9 MR. WEBB: He called me up front.

10 MR. BILTZ: And tell him exactly who  
11 pulled you out first and tell him the whole --

12 MR. WEBB: Sheriff Les Cotton pulled me  
13 out first.

14 MR. HINTON: Let's go -- you got arrested  
15 on January the 1st, 1992, on this agg rob?

16 MR. WEBB: Uh-huh.

17 MR. HINTON: Did you ever bond out on  
18 that?

19 MR. WEBB: I don't think so.

20 MR. HINTON: Okay. So sometime is it  
21 that after January the 1st of 1992 and before you pled  
22 guilty in March of 1992 to the agg rob, when would it  
23 have been that Les Cotton talked to you about anything  
24 that had to do with Willingham?

25 MR. WEBB: It would have had to have been

1 right at the end -- right at the end or the middle of  
2 January.

3 MR. HINTON: All right. Did you know  
4 Willingham before you got to jail in January of 1992?

5 MR. WEBB: Nope.

6 MR. HINTON: How -- did you come to know  
7 him in the jail here in Navarro County?

8 MR. WEBB: I was just a trustee. I was  
9 just walking around and talking to him. That was it.

10 MR. HINTON: All right.

11 MR. WEBB: I didn't know what I was  
12 doing. I mean I never knew him.

13 MR. HINTON: How was it that you ever  
14 said -- did anybody ever said any -- anybody in law  
15 enforcement in Navarro County ever said anything to you  
16 about Willingham?

17 MR. WEBB: Because they noticed me  
18 talking to him through the bean shoot --

19 MR. HINTON: All right.

20 MR. WEBB: -- on camera or in picket.  
21 They was in the picket and they seen me talking to him  
22 and that's when Les called me up front and said, look,  
23 man, what are you talking to that dude about.

24 MR. HINTON: All right. Les -- Les  
25 Cotton, he was the elected Sheriff?

1 MR. WEBB: Sheriff.

2 MR. HINTON: Did you know Les at the time  
3 that this conversation took place? Had you spoken to  
4 him before about any other things?

5 MR. WEBB: No, I just I knew him.

6 MR. HINTON: Knew who he was?

7 MR. JOHNSON: So did he call you to his  
8 office or to the...

9 MR. WEBB: He called me to his office.  
10 He called me up front.

11 MR. HINTON: All right. As carefully as  
12 you can, I know it's been a long time; but tell us word  
13 by word or some -- what did he tell you? You said,  
14 well, I see you've been talking to Willingham. Tell me  
15 what the -- how that conversation developed.

16 MR. WEBB: Well, basically he said -- as  
17 far as I remember, he was telling me, he said, well, you  
18 know, that dude killed all three of his children.

19 MR. HINTON: Did you know that before he  
20 told you?

21 MR. WEBB: No.

22 MR. HINTON: Did you know at the time  
23 that Les Cotton was talking to you what Willingham was  
24 in jail for?

25 MR. WEBB: He never would say nothing,

1 man. He never told me. When I was talking to him, it  
2 was mostly about, you know, the fact that something was  
3 going on between him and his wife and, you know,  
4 something had happened to one of his kids and that's all  
5 he really said and he was buying medication from me  
6 because I was getting psych medication to help me sleep  
7 and he was just giving me candy to buy medication.  
8 That's basically what we was talking about. I mean it  
9 wasn't really anything to do with his case.

10 MR. HINTON: Okay. Tell us more about  
11 how the conversation developed, that first conversation  
12 between you and Sheriff Cotton.

13 MR. WEBB: It just -- you know, he said,  
14 well, if you can find out anything, it'd probably be  
15 beneficial for you. And he said, I know you want to do  
16 the right thing. That's the one thing they kept saying  
17 over and over and over all through this whole thing was  
18 you need to do the right thing. Because I was trying to  
19 beat drug addiction, I was trying to get my life  
20 straight; but I was still young, man. I mean I didn't  
21 really know what getting your life straight was. You  
22 know, I was 22 years old, man. I was an addict and  
23 bottom line is that I really didn't understand what was  
24 going on, man.

25 MR. HINTON: Uh-huh.

1 MR. WEBB: And it just from one thing to  
2 another it was, you know, they had pulled me out and  
3 talked to me and as it went on, they would tell me,  
4 well, you know what? They would say that he said this  
5 or he said that, that will help you.

6 MR. HINTON: Now who is the "they."

7 MR. WEBB: Les Cotton and John Jackson.  
8 That's the only ones I ever really talked to.

9 MR. HINTON: All right. Let's go back to  
10 the very first conversation you have when Sheriff Cotton  
11 pulled you out, brought to his -- you were brought to  
12 his office and he said you've been talking to this  
13 Willingham guy, what are y'all talking about, blah,  
14 blah, blah, and he said something about if you knew  
15 anything that could help, it would help you or something  
16 to that effect.

17 MR. WEBB: That was the first time.

18 MR. HINTON: First time.

19 MR. WEBB: He sent me back.

20 MR. HINTON: What did you tell Les  
21 Cotton?

22 MR. WEBB: I just said nothing. I just  
23 said he just gives me candy. I wasn't going to tell him  
24 I was selling medication to him.

25 MR. HINTON: Yeah.

1 MR. WEBB: I said he gives me candy, and  
2 I just -- you know, we was just talking.

3 MR. HINTON: All right.

4 MR. WEBB: Nothing to it.

5 MR. HINTON: Well, were you brought to  
6 Les Cotton's office a second time?

7 MR. WEBB: Three or four times.

8 MR. HINTON: Three or four times.

9 MR. WEBB: It was about three times, and  
10 then they took me over to see John Jackson.

11 MR. HINTON: Let's start at the second  
12 time. About how much time passed from the first time to  
13 the --

14 MR. WEBB: A week.

15 MR. HINTON: -- second? About a week  
16 later. Tell me how that developed.

17 MR. WEBB: He just said that he'd been  
18 talking to John and Mr. Pearce and, you know, Mr. Pearce  
19 told him --

20 MR. HINTON: Well, wait, wait, wait,  
21 wait, wait. Second time you go to Les Cotton, what does  
22 he ask you?

23 MR. WEBB: Have you found out anything.

24 MR. HINTON: And what did you say?

25 MR. WEBB: No.

1 MR. HINTON: All right. What other  
2 things were covered in that conversation?

3 MR. WEBB: He said, well, I've been  
4 talking to Mr. Pearce. I've been talking to John.

5 MR. HINTON: At that time, you knew who  
6 Mr. Pearce was?

7 MR. WEBB: Yes.

8 MR. HINTON: Did you know who he was  
9 talking about John?

10 MR. WEBB: Yeah, John Jackson.

11 MR. HINTON: All right. Did you know  
12 that he was the First Assistant District Attorney here  
13 in Navarro County?

14 MR. WEBB: Yes.

15 MR. HINTON: Were you aware of whether or  
16 not he had anything to do with the prosecution of your  
17 aggravated robbery case?

18 MR. WEBB: Yes.

19 MR. HINTON: How did you know that?

20 MR. WEBB: Because Les told me.

21 MR. HINTON: All right. Did you already  
22 have April Sikes as a lawyer?

23 MR. WEBB: I don't remember if I did or  
24 didn't.

25 MR. HINTON: Okay. So second



1 conversation when you're pulled into Cotton's office,  
2 you say, no, I haven't.

3 He says "Have you been talking to him?"

4 "No, I haven't."

5 MR. WEBB: Yes, I had. I had been  
6 talking to him. I haven't found anything. No, I  
7 haven't.

8 MR. HINTON: Okay. Was there a third  
9 time that you were brought to Les Cotton's office?

10 MR. WEBB: Uh-huh.

11 MR. HINTON: How much time later after  
12 the second?

13 MR. WEBB: A couple weeks or a week. You  
14 know, I don't really remember exactly how much.

15 MR. HINTON: Sure.

16 MR. WEBB: But just a little while  
17 longer.

18 MR. HINTON: And what -- tell us how --  
19 what was said in that conversation?

20 MR. WEBB: Well, in his conversation, he  
21 said, look, John is going to be talking to you and if  
22 you'll help us, then we'll make sure -- we'll make sure  
23 you're all right. We'll help you.

24 And I said, well, Les. I said, man, I  
25 didn't even do this robbery, man. You know, and I

1 didn't. You know, the whole thing about my robbery  
2 charge was bogus anyway. My mom will explain that to  
3 you. I didn't rob that lady. That lady worked for my  
4 family. What was happening was my dad had a bunch of  
5 his guns stolen out of his house. It wasn't me. It was  
6 my brother and a chick named Vicki Sherrard. Well, my  
7 dad found out that I had knew about it and didn't tell  
8 him and he got pissed off because I was up in Dallas  
9 working for my cousin, Amy Isabelle.

10 Well, you know, yeah, they brought the  
11 guns up there and we sold them for drugs or whatever.  
12 But then when my dad found out about it, I had to move  
13 back home and it came out that I had been involved with  
14 it. Then all of a sudden they found out I was doing  
15 drugs and all this, so they decided to get me off the  
16 streets.

17 MR. HINTON: Right.

18 MR. WEBB: So they had this girl say that  
19 I come and robbed her with a knife. Which I didn't, but  
20 that's what they locked me up for to get me off the  
21 street and get me clean.

22 MR. HINTON: Okay. All right.

23 MR. WEBB: Then that's when John Jackson  
24 got involved with the case.

25 MR. HINTON: The third time that you went

1 to Les Cotton's office?

2 MR. WEBB: Uh-huh.

3 MR. HINTON: All right.

4 MR. WEBB: That's when they told me I was  
5 fixing to go see John Jackson.

6 MR. HINTON: So this is the third time  
7 that you're pulled out of the cell and you're taken over  
8 to Les Cotton, the Sheriff's office, and by this time  
9 you've still not said anything negative about  
10 Willingham?

11 MR. WEBB: No.

12 MR. HINTON: Now is the third time the  
13 time that you go to see John Jackson?

14 MR. WEBB: Uh-huh.

15 MR. HINTON: Why?

16 MR. WEBB: Because he wanted to ask me  
17 and go over what I was going to say.

18 MR. HINTON: All right. So was it --

19 MR. WEBB: If I was going to be willing  
20 to cooperate and do what they wanted me to do. That was  
21 the whole thing. They wanted me to say that he had told  
22 me --

23 MR. HINTON: Okay.

24 MR. WEBB: -- that he had done these  
25 things.

1 MR. HINTON: Where did that meeting  
2 occur?

3 MR. WEBB: John Jackson's office in the  
4 courthouse.

5 MR. HINTON: On the -- is it third floor  
6 or --

7 MR. WEBB: Second floor.

8 MR. HINTON: Second floor, all right.  
9 Who was in that meeting?

10 MR. WEBB: Me, John Jackson, and the  
11 officer was made to stand outside.

12 MR. HINTON: The officer that transported  
13 you?

14 MR. WEBB: Yeah.

15 MR. HINTON: Was Les Cotton there?

16 MR. WEBB: I don't know if Les was at the  
17 first one or not.

18 MR. HINTON: Okay.

19 MR. WEBB: I know he was at -- he was at  
20 one of them. I don't remember if that was the first one  
21 or --

22 MR. HINTON: Okay.

23 MR. WEBB: -- the second one. I don't  
24 remember. But Les was at one of them because we all sat  
25 down together and talked.

1 MR. HINTON: Okay. Now what do you  
2 recall the conversation was between you and John Jackson  
3 the first time you met him in his office in the Navarro  
4 County Courthouse?

5 MR. WEBB: That if I really wanted to  
6 clean up my life, that he would help me; but in return,  
7 I had to help him.

8 MR. HINTON: To your knowledge, did you  
9 already have April Sikes as an appointed lawyer in the  
10 aggravated robbery case?

11 MR. WEBB: I don't remember.

12 MR. BILTZ: And I'll say this. I would  
13 be very surprised if -- normally once you're in jail for  
14 a week or two, they automatically appoint somebody to  
15 you. So I would be surprised if he was unrepresented by  
16 counsel on second degree felony after he had been in  
17 jail for a month.

18 MR. HINTON: Well, first degree felony.

19 MR. BILTZ: For first -- yeah, first  
20 degree felony, yeah.

21 MR. HINTON: Okay. Now -- but April,  
22 whether or not she had been appointed to represent you,  
23 she was or was not in that first meeting that you had  
24 with --

25 MR. WEBB: She was never there.

1 MR. HINTON: She was never there, all  
2 right. Did you -- what did you say to John Jackson when  
3 he said something to the effect if you help us on  
4 Willingham, we'll help you back or whatever it was?

5 MR. WEBB: And I said, well, what do you  
6 want me to do.

7 MR. HINTON: And what did John Jackson  
8 say?

9 MR. WEBB: He said, well, let's go over  
10 that I think needs to happen. He says I've got this guy  
11 Willingham who did this. We know he did it. We know  
12 he's guilty. We just can't prove it. He said right  
13 now, they're -- we're looking at either giving him 35  
14 and 15 on a plea agreement and this dude getting away  
15 with murder. Are you helping us and him going to prison  
16 for the rest of his life? And that's exactly what he  
17 told me.

18 MR. HINTON: All right. What did you say  
19 in return at that first meeting with John Jackson?

20 MR. WEBB: I said, well, what is it going  
21 to entail? I mean what is my position? What am I going  
22 to have to do, John? I mean what's going to be my deal?

23 And he says, well, you know, you can put  
24 that like this. He said you can take this case to  
25 trial -- because I had already told him that I didn't do

1 the robbery. And he say, well, that's neither here nor  
2 there. He says that robbery will disappear. If you  
3 help me, that robbery will disappear.

4 And I said, what do mean disappear?

5 And he says even if you're convicted now,  
6 I can get it off of you later.

7 And a matter of fact, he did try.

8 MR. HINTON: All right. Well, you're  
9 saying robbery and I want to make sure that we make a  
10 clear distinction between aggravated robbery, which  
11 would be using a knife, and non-aggravated second degree  
12 robbery, which is not using a knife or a deadly weapon.  
13 You were charged with using a knife, aggravated robbery  
14 first degree felony?

15 MR. WEBB: Uh-huh.

16 MR. HINTON: All right. What did you --  
17 how did you leave it with your first meeting? How did  
18 you leave it with John Jackson after your first meeting?

19 MR. WEBB: That he would call me back,  
20 and if I was going to do it. I told I would and --

21 MR. HINTON: You would? You would do  
22 what?

23 MR. WEBB: I would testify against  
24 Willingham.

25 MR. HINTON: All right. You told John

1 Jackson that at that first meeting?

2 MR. JOHNSON: Did you even know what you  
3 were going to say at that point? You just knew that  
4 you -- you were going to help them, but you --

5 MR. WEBB: That's right.

6 MR. JOHNSON: -- didn't have anything to  
7 say yet?

8 MR. WEBB: Well, he hadn't went over  
9 everything that he was going to have me say.

10 MR. HINTON: Okay. Did you understand  
11 that your help would have to come from your in-jail  
12 relationship with Willingham? You'll have to answer out  
13 loud.

14 MR. WEBB: I just knew that I would have  
15 to keep talking to him so they would have a reason to  
16 say that I had talked to him.

17 MR. HINTON: All right.

18 MR. WEBB: And that that was, you know,  
19 credible.

20 MR. HINTON: Did you understand that the  
21 help that you were expected to give the prosecution on  
22 Willingham would be that Willingham said something to  
23 you that incriminated him in that fire that killed his  
24 children?

25 MR. WEBB: Yes, sir.



1 MR. HINTON: All right. So after the  
2 first meeting with John Jackson, did you have a second  
3 meeting with John Jackson?

4 MR. WEBB: I had like three or four  
5 meetings with John Jackson.

6 MR. HINTON: All right. If you can --  
7 and it may be impossible for you to remember what  
8 happened at each meeting; but I'm just going to ask you  
9 at the second meeting, what do you recall? How did it  
10 develop?

11 MR. WEBB: The pictures. The pictures is  
12 probably the most distinctive thing I remember.

13 MR. HINTON: Would that be the second  
14 meeting with John Jackson?

15 MR. WEBB: It was either second or third.  
16 I don't remember. But the next meeting I remember  
17 distinctly was the one where he pulled out the pictures  
18 and said this is what I want to show you that he did.

19 MR. HINTON: All right. Pictures of the  
20 burned, charred bodies of his -- of Willingham's  
21 children?

22 MR. WEBB: The only picture I seen was an  
23 arm and it had burns on it. I didn't see actual photos  
24 of the children like that.

25 MR. HINTON: Okay.

1 MR. WEBB: I just seen -- and he said  
2 that's one of his children right there. It's dead.  
3 That he killed.

4 MR. HINTON: Okay. And what did either  
5 of you say at this next meeting? I'm just trying to get  
6 for the record or for that recorder right there, just  
7 develop how this relationship evolved between you and  
8 John Jackson with regard to Willingham.

9 MR. WEBB: It just evolved that he needed  
10 me to testify against Willingham, to lie on Willingham,  
11 and I was in a position to where either I was going to  
12 do what they asked me to do or I was going to do a lot  
13 of time in prison and I didn't want to go to prison for  
14 that long because I knew nobody was going to help me,  
15 you know. Nobody want -- in this county right here,  
16 nobody is going to help you.

17 MR. HINTON: Well, when, if ever, did  
18 Mr. Chuck Pearce's name ever come up when you're talking  
19 to John Jackson?

20 MR. WEBB: It came up with the fact, you  
21 know, because I had mentioned I wanted to go to diving  
22 school and he says, look, we can get Chuck to help you  
23 with anything you need. He's already there to help you.

24 MR. HINTON: Well, tell us for the record  
25 how it is in your talks with John Jackson you knew what

1 the word "Chuck" meant and to whom it referred?

2 MR. WEBB: It meant Chuck Pearce.

3 MR. HINTON: I know. But how did --  
4 you'll have to explain to me how you knew that when he  
5 says "Chuck," he meant Chuck Pearce.

6 MR. WEBB: What do you mean how do I  
7 know?

8 MR. HINTON: How would John Jackson have  
9 known that you knew anything about Chuck Pearce?

10 MR. WEBB: Well, because I went out to  
11 the ranch with him and stuff. See, that's the thing.  
12 John lives in Powell. Well, Chuck owns a ranch out in  
13 Kerens. Well, everybody knows Mr. Pearce. I mean it's  
14 like one of the biggest ranches there. Well, we used to  
15 go out on the ranch and shoot guns with Mr. Pearce and  
16 other kids from (inaudible). Well, Mr. Pearce and John  
17 Jackson and what's the other guy, the commissioner?

18 MR. JOHNSON: Joe Graves.

19 MR. WEBB: Joe Graves. All of them used  
20 to be out there when we was out there. Everybody knew  
21 we knew that guy, and I mean he's a really good guy.  
22 But John Jackson and Mr. Pearce's relationship was more  
23 like some money thing, you know. They would get Pearce  
24 to buy things for people so they could get testimony or  
25 whatever they needed and Chuck Pearce had the money to

1 afford it.

2 MR. HINTON: Okay. And you were aware of  
3 that?

4 MR. WEBB: Yeah.

5 MR. HINTON: All right, okay. So John  
6 Jackson mentions the name Chuck Pearce to you in the  
7 second or the third conversation that you had with John  
8 Jackson?

9 MR. WEBB: Right.

10 MR. HINTON: And how was it mentioned to  
11 you?

12 MR. WEBB: Because I wanted -- I'd said  
13 that I wanted to go to diving school and he said, well,  
14 you know, things can be taken care of.

15 And I said, well, you know, I'm looking  
16 at doing all this time.

17 He said, man, I guarantee you, you will  
18 not do that much time. He says I can get you out of  
19 prison. I can get you into diving school, and I'll use  
20 Chuck to do it.

21 MR. HINTON: Okay. And this was the  
22 second or the third conversation you had with John  
23 Jackson?

24 MR. WEBB: As a matter of fact, the whole  
25 time I was in prison for 15 years, Mr. Pearce put money

1 on my books every month like clockwork.

2 MR. HINTON: Okay, we'll get to that in  
3 just a minute. That's a really important part of this  
4 whole deal. Was it the second or third meeting that you  
5 had with John Jackson that you agreed to help?

6 MR. WEBB: Yeah.

7 MR. HINTON: Okay. And how did that  
8 develop, what you were supposed to do, what you were  
9 supposed to say about Willingham that was supposed to  
10 help?

11 MR. WEBB: He wanted me to go over -- he  
12 wanted me to look at some of those pictures and he said,  
13 look, if you look at these pictures right here, you can  
14 see the burn marks on the baby's arm. They're dead. He  
15 did that. Look at the pictures of the inside of the  
16 house. He says your story doesn't have to match  
17 exactly. He says I want you to just say he put fires in  
18 the corners or he put fires wherever. I need you to be  
19 able to say that so that we can convict him. Otherwise,  
20 we're going to have a murderer running our streets.

21 MR. HINTON: All right. You're saying  
22 that Mr. Jackson said you're going to need to say that  
23 Willingham told you --

24 MR. WEBB: That's right.

25 MR. HINTON: -- that he put something on

1 the floor in the corners that was flammable and he  
2 ignited it for the purpose of killing his kids?

3 MR. WEBB: It wasn't just anything. It  
4 was lighter fluid. You know, like charcoal lighter  
5 fluid.

6 MR. HINTON: Charcoal lighter fluid.

7 MR. WEBB: Yep.

8 MR. HINTON: How did -- who told you it  
9 was charcoal lighter fluid?

10 MR. WEBB: That's what he said. Just say  
11 it was charcoal lighter fluid.

12 MR. HINTON: When you say "he" --

13 MR. WEBB: John Jackson.

14 MR. HINTON: John Jackson told you that  
15 the accelerant was charcoal lighter fluid?

16 MR. WEBB: Yeah.

17 MR. HINTON: Okay, okay. And you're  
18 saying that Willingham never told you anything about --  
19 you'll have to say out loud.

20 MR. WEBB: No, he didn't.

21 MR. HINTON: Okay.

22 MR. WEBB: Actually what he told me was  
23 when he came home, everything was fine. He went to  
24 sleep. He woke up, and the house was on fire. That's  
25 all he said.

1 MR. HINTON: Okay. Did Willingham ever  
2 tell you anything about what he tried to do to save his  
3 children? And I'm not trying to --

4 MR. WEBB: John Jackson just told me  
5 that, you know, there was testimony -- there was going  
6 to be testimony in the trial and this is before the  
7 trial, that Willingham went out and put clothes in his  
8 car, all of his clothes in his car before that fire ever  
9 happened. You know, he said that. He said that's going  
10 to come out. He said there's a lot of things that are  
11 going to come out, Johnny, that you don't know about.

12 One of the main things that he had always  
13 said -- and he said it more than once and this is after,  
14 after the trial he said this. He said, you know, in my  
15 closing argument, I said to the jury do you think -- you  
16 know, you as children you read about bedtime stories  
17 about monsters and he said he pointed at Willingham and  
18 said that's the monster right there.

19 And the whole time he was saying that, I  
20 thought, you know, Willingham is a monster? Who's  
21 really the monster when you make people do things they  
22 don't want to do? I mean I never heard --

23 MR. BILTZ: I heard that Jackson was  
24 arguing at the trial that Willingham had Satanic  
25 literature on his wall from a Led Zeppelin poster.

1 MR. JOHNSON: God damn, I had some of  
2 that shit, too.

3 MR. BILTZ: Yeah, I know. It makes us  
4 all Satanists, doesn't it.

5 MR. JOHNSON: I've got several of their  
6 albums. Am I going to hell?

7 MR. BILTZ: Yeah, I've got some in my  
8 car.

9 MR. HINTON: Okay. So how many times do  
10 you recall roughly meeting with John Jackson prior to  
11 your testimony in the Willingham trial?

12 MR. WEBB: Four to five times.

13 MR. HINTON: On how many of those  
14 occasions did you and John Jackson talk about what the  
15 facts were that you needed to say that Willingham told  
16 you about?

17 MR. WEBB: Three. The first time we  
18 talked, it wasn't really about it. It was just whether  
19 I was going to testify or not. Well, actually four  
20 because the second time is when he started going into  
21 details about what was going to need to be said. So,  
22 yeah, it was four times we went into facts.

23 MR. JOHNSON: Are you saying that  
24 basically you rehearsed what you were going to say?

25 MR. WEBB: Absolutely, that's exactly --



1     yeah, that's exactly what he was doing. Rehearsing with  
2     me what I had to say, what I needed to say.

3                   MR. BILTZ: And so obviously you weren't  
4     present for closing arguments, were you?

5                   MR. WEBB: No.

6                   MR. BILTZ: So you just heard second hand  
7     about him saying that --

8                   MR. WEBB: He told me himself.

9                   MR. BILTZ: Jackson did?

10                  MR. HINTON: He told you that's what he  
11     was going to say?

12                  MR. WEBB: That's what he said after the  
13     trial. He told me that.

14                  MR. JOHNSON: This is post trial.

15                  MR. BILTZ: So you had contact with him  
16     after the trial --

17                  MR. WEBB: Yeah.

18                  MR. BILTZ: -- and he brings you back  
19     over there?

20                  MR. JOHNSON: Dude, I've got letters from  
21     him when he wrote me in prison.

22                  MR. BILTZ: At the house?

23                  MR. WEBB: Yeah. Well, there not at the  
24     house. I've got them put up; but, yeah, I've got --  
25     I've got a shitload of letters.

1 MR. JOHNSON: From John Jackson?

2 MR. WEBB: Yeah.

3 MR. JOHNSON: Did you get letters from --

4 MR. WEBB: I got letters from Mr. Pearce  
5 telling me that John Jackson was sending messages to  
6 Pearce for Mr. Pearce to tell me. Yeah, I've got all  
7 that. I guarantee you I've got it. I promise that.  
8 I'm not going to lie to you people. I'm telling you the  
9 truth. I want to get my name cleared on this because I  
10 mean what happened to this man ain't right. They killed  
11 a man for no reason. I can't get my life right until I  
12 get this away from my life.

13 MR. HINTON: And let me just say this,  
14 Johnny. I don't know or care whether Willingham set the  
15 fire that killed his children. What I am concerned  
16 about at this point is that his conviction was obtained  
17 with knowingly false testimony and after the conviction,  
18 there were several things that took place that at  
19 another time we'll go into that had to do with John  
20 Jackson and Mr. Pearce helping you out that was never --  
21 it was never disclosed to Willingham's appeals lawyers.  
22 Appellate lawyers or writ lawyers. It never was.

23 MR. WEBB: There's a lot of things they  
24 never want to come out.

25 MR. HINTON: This idea of there was never

1 a deal, there was never a deal, that's what we're  
2 concerned about. Mr. Willingham has been executed.  
3 That's over. He could have been an innocent man. He  
4 might not have been an innocent man, but it wasn't fair.  
5 It wasn't done right and I don't want to see that happen  
6 again here or anybody -- any place else. And that's  
7 the -- that's the importance of your -- the truthfulness  
8 of your testimony. That's why it's so important for us  
9 to be able to corroborate everything we can about what  
10 you're saying.

11 I don't want you to embellish it. I  
12 don't want you to leave anything out. I just want it to  
13 be straight down the line. Every one of us at a time or  
14 two or three or more in his life has said something that  
15 he knew was not absolutely true. Okay? That's human  
16 nature. All I've got to do and all Mr. Johnson and I  
17 are concerned about is getting to the absolute  
18 unvarnished truth. We don't want to do the same thing  
19 that you believe that John Jackson did and that is we  
20 don't want to create a problem that doesn't exist. We  
21 want to try to solve a problem, that we appear -- that  
22 appears to exist. Okay? Let me show you a few things  
23 here.

24 MR. BILTZ: Guys, we've got about two  
25 minutes and they're going to run us out.

1 MR. JOHNSON: Okay, we better get some  
2 waivers signed and notarized.

3 MR. HINTON: Yeah, let's get -- I added  
4 FBI on this thing. So what I'd like for you to do, if  
5 you want to do it, you sign this thing. Mr. Johnson is  
6 a notary.

7 MR. BILTZ: And I've gone over it,  
8 everything.

9 MR. WEBB: So you're advising me?

10 MR. BILTZ: Yep.

11 MR. HINTON: I added Federal Bureau of  
12 Investigation on there.

13 MR. WEBB: Okay.

14 MR. JOHNSON: If you'll hand that to me,  
15 I'll notarize it.

16 MR. HINTON: While it says in here  
17 that --

18 MR. JOHNSON: Did you add anything to  
19 the -- the FBI to that?

20 MR. HINTON: I think I did. Initial  
21 where I've written in Federal Bureau of Investigation.

22 MR. BILTZ: Johnny, the people around  
23 here know that I'm on your case like a hawk. You are --  
24 you are safe. Nobody is going to fuck with you and  
25 that's why I wanted to show the forces that nobody is

1 going to mess with Johnny Webb with a team a lawyers  
2 floating around. And after we go through step one,  
3 we'll talk about what's going on (inaudible) with you.

4 MR. HINTON: Did you initial each of the  
5 pages?

6 MR. WEBB: This one ain't got FBI on...

7 MR. JOHNSON: Let's get organized. That  
8 needs to be initialed at the bottom of the page.

9 MR. WEBB: See, I've got documents that  
10 I've put up at my friend's house that I can go get.  
11 That's why I'm trying to get out on bond.

12 MR. BILTZ: And then we expect -- I  
13 talked to his mother this morning. It looks like  
14 Wednesday we're going to be getting his bond posted. So  
15 hopefully at the end of next week we'll be able to -- if  
16 you guys you think have another meeting, we'll be able  
17 to meet at my office.

18 MR. HINTON: Great.

19 MR. BILTZ: And, Johnny, I don't want you  
20 to mentioning to anybody that you're about to post bond.  
21 No other inmates or anything. It's just I don't want  
22 any jailers to give a heads up to somebody and have your  
23 bond (inaudible) and turn around your bond. So I've got  
24 an extra zero added on to the end of it just to keep  
25 everything quiet.

1 MR. WEBB: (Inaudible) legal.

2 MR. HINTON: Initial those if you would,  
3 please.

4 MR. JOHNSON: I'm sitting here not  
5 working this damn stamp. Oh, that came apart.

6 MR. BILTZ: Does your cell ever get  
7 tossed? They go through you shit?

8 MR. WEBB: Uh-huh.

9 MR. BILTZ: Can we have a copy for Mr.  
10 Webb? (Inaudible) copy here because I would rather hold  
11 on to it and not -- yeah, I don't want that being in  
12 your cell. Let me have it. Just recantation.

13 MR. WEBB: Yeah, I wrote that.

14 MR. HINTON: You wrote Mr. Pearce a  
15 letter the month before -- this is dated the 30th of  
16 March of 2000. You wrote Mr. Pearce a letter the month  
17 before this explaining to him why you were doing this  
18 recantation. Do you remember that?

19 MR. WEBB: Yeah, probably. I don't  
20 remember. I mean I may have.

21 MR. HINTON: Oh, excuse me. Excuse me.  
22 Let me show it to you real quick.

23 (Inaudible conversation in the  
24 background)

25 MR. JOHNSON: I've got three here that

1 are -- is three all there were?

2 MR. HINTON: No, there were four.

3 MR. JOHNSON: Here's the other one.

4 MR. HINTON: There are five of them in  
5 total. Thank you, sir. Let's see, look at this thing.  
6 There is something that's dated. See this -- they put  
7 the envelope on the bottom of this recantation motion,  
8 so you can't read everything; but it says 3/30/00. The  
9 month before, month and a half before, February the  
10 12th, '00, you write this to Mr. Pearce. I mean I say  
11 you did. It appears that you did.

12 MR. JOHNSON: Make sure they're all  
13 stamped.

14 MR. BILTZ: Yeah.

15 MR. WEBB: Yeah.

16 MR. HINTON: Tell us about that. That's  
17 the letter that you wrote to Mr. Pearce on the 12th of  
18 February. Tell us what -- had you already written what  
19 is dated 3/30/00, which is your motion to recant  
20 testimony when you composed this letter of February the  
21 12th, 2000, to Mr. Pearce?

22 MR. WEBB: I don't know.

23 MR. HINTON: All right. Well, why did  
24 you -- tell us why you wrote this letter of 2/12/00 to  
25 Mr. Pearce.

1 MR. WEBB: I was scared. Because I was  
2 scared.

3 MR. HINTON: Right, right. You were  
4 scared about the threats that were made on your life  
5 while you were in the penitentiary on the agg rob,  
6 correct?

7 MR. WEBB: No, I was --

8 MR. HINTON: No, this was in Navarro.  
9 This is was in the cocaine case?

10 MR. WEBB: No, this was -- yeah, this  
11 cocaine.

12 MR. HINTON: Yeah.

13 MR. WEBB: But I didn't get no threats  
14 about the cocaine. I got threats.

15 MR. HINTON: About the Willingham  
16 testimony?

17 MR. WEBB: Yeah.

18 MR. HINTON: Right. To be clear, when is  
19 it that you paroled out on the aggravated robbery case?

20 MR. WEBB: In '98.

21 MR. HINTON: Okay, 1998, you were in  
22 there and your testimony, as a matter of fact, you were  
23 asked by David Martin, one of Willingham's lawyers, have  
24 you computed how long you're going to be staying -- the  
25 minimum that you're going to stay before you're parole



1 eligible, something to that effect. Let me show you the  
2 transcript of that testimony. On cross-examination,  
3 Mr. Martin says: Now presently you're under a sentence  
4 of 15 years to do in the penitentiary?

5 "ANSWER: True."

6 "QUESTION: Is that aggravated or  
7 non-aggravated?"

8 "ANSWER: Aggravated."

9 "QUESTION: How much time do you  
10 understand that you will stay at a minimum in the  
11 penitentiary?"

12 "ANSWER: Three years and nine months."

13 Three years and nine months, how did you  
14 arrive at that?

15 MR. WEBB: I don't know. Back then I had  
16 a paper floating around or something that said --

17 MR. BILTZ: Like one of those charts that  
18 the --

19 MR. WEBB: Chart.

20 MR. BILTZ: -- lawyers hand out showing  
21 what you're minimum eligibility and mandatory.

22 MR. HINTON: Well, three years and nine  
23 months is exactly 25 percent of 15 years; so that's a  
24 pretty standard deal. Did you understand that your  
25 parole eligibility date might be shorter if you --

1 MR. WEBB: I was under -- I thought at  
2 some point in time -- I don't remember; but at some  
3 point in time in Legislature, they went to half.

4 MR. HINTON: On a 3G offense?

5 MR. WEBB: Yeah, and that's what I had.  
6 And when I went back, they told me I wasn't eligible for  
7 release again. I did all nine years on the rest of it.  
8 I did the whole thing.

9 MR. BILTZ: So you got revoked on parole?

10 MR. WEBB: Uh-huh. I revoked my parole,  
11 and they wouldn't let me out again.

12 MR. HINTON: When did they revoke your  
13 parole? Because of the cocaine?

14 MR. WEBB: In '98.

15 MR. BILTZ: And that's when you were down  
16 in Houston at Ocean's Corp., right?

17 MR. WEBB: Uh-huh.

18 MR. HINTON: All right. Who paid for  
19 Ocean's Corp.?

20 MR. WEBB: I don't remember. My mom said  
21 that they're saying that I still owe money. But  
22 Mr. Pearce was the one that got me in there. I mean  
23 he's the one that -- they've got to have the money  
24 transfer from where he transferred me several times  
25 \$4,000 from his bank account electronically to the

1 Ocean's Corp. and Ocean Corp. wrote me a check and gave  
2 it to me as my spending money.

3 MR. HINTON: Okay, all right. Did  
4 Mr. Pearce acknowledge to you that he was going to pay  
5 money for your underwater diving and welding class?

6 MR. WEBB: Yeah.

7 MR. HINTON: All right. How much was it  
8 going to cost you to go to those classes?

9 MR. WEBB: I think back then it was  
10 15,000 for the full course.

11 MR. HINTON: As far as you know, did he  
12 pay everything that was paid?

13 MR. WEBB: I don't know. I mean I  
14 assume. I don't know. I don't know how --

15 MR. BILTZ: You didn't pay any percent of  
16 it though?

17 MR. WEBB: No.

18 MR. BILTZ: So any payment that was made,  
19 was made by Chuck?

20 MR. WEBB: Just like out here at the  
21 college. I mean my welding course, I guarantee you.  
22 I've got the paper on it in the cell. My mom sent me a  
23 copy of it and it shows the reference number, which is a  
24 check number, and it's Mr. Pearce's check number.

25 MR. BILTZ: Okay, all right.

1 MR. HINTON: Tell us about the money --  
2 did you receive money from Mr. Pearce upon your parole  
3 and on this aggravated robbery?

4 MR. WEBB: \$10,000 check.

5 MR. HINTON: All right. But what was  
6 that for?

7 MR. WEBB: So I can get me a truck.  
8 Whatever I needed. It was for my testimony.

9 MR. HINTON: Yeah. Well, when did you  
10 know that he was going to give you some money to buy a  
11 vehicle when you got paroled?

12 MR. WEBB: I didn't.

13 MR. HINTON: It came as a surprise to you  
14 when you got paroled?

15 MR. WEBB: They told me the agreement was  
16 is he was going to send me to diving school and then  
17 when I got out, he said, by the way, John said get you a  
18 vehicle and he gave me a \$10,000 check.

19 MR. HINTON: Where did you physically  
20 take possession of the ten --

21 MR. WEBB: At Mr. Pearce's house and I  
22 had my girlfriend with me, Shawna Bell Shaw.

23 MR. HINTON: Shawna Bell Shaw?

24 MR. WEBB: Uh-huh.

25 MR. BILTZ: We're going to have to wrap

1 up real quick.

2 MR. HINTON: We got to go, all right.  
3 Was that -- where is that house?

4 MR. WEBB: Here in Corsicana.

5 MR. HINTON: Okay. And what did you do  
6 with that check?

7 MR. WEBB: Went and bought a truck.

8 MR. HINTON: Did you go and buy some  
9 cashier's checks?

10 MR. WEBB: Yes, sir, I did.

11 MR. HINTON: Where?

12 MR. WEBB: At the bank here, Corsicana  
13 Bank.

14 MR. HINTON: All right. And then where  
15 did you buy the truck?

16 MR. WEBB: At a car lot here. That's  
17 what my mom's trying to do.

18 MR. BILTZ: It's a car lot right around  
19 here somewhere, isn't it?

20 MR. WEBB: My mom's trying to get all  
21 that information now.

22 MR. BILTZ: And we've got the truck and  
23 the license plate number and we know the date that the  
24 truck was registered with the County, also. It's the  
25 same day you bought it, right? You registered it the

1 same day?

2 MR. JOHNSON: Okay. Are we going end  
3 this?

4 MR. HINTON: Yes.

5 MR. JOHNSON: My name is Ken Johnson, and  
6 we're conducting an interview. It is March 13th,  
7 2015[sic]. We've conducted an interview with Johnny  
8 Webb at Navarro County Jail. In attendance was also  
9 Attorney Robert Hinton, Attorney Daniel Biltz, and  
10 myself and Mr. Webb.

11 MR. HINTON: Mr. Webb, did we record this  
12 with your permission?

13 MR. WEBB: It was already going. I mean  
14 I guess it's my permission.

15 MR. BILTZ: Yes or no, it's okay for us  
16 to record this?

17 MR. JOHNSON: I can delete it right now.

18 MR. WEBB: Yep.

19 MR. JOHNSON: All right, thank you.

20 (Audio file ends)  
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INTERVIEW OF JOHHNY WEBB

TAKEN MARCH 27, 2014

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1 MR. JOHNSON: Okay. This is Kenny  
2 Johnson. It's 10:08 a.m., March 27th. We're in the law  
3 office of Attorney --

4 MR. BILTZ: Daniel Biltz.

5 MR. JOHNSON: -- Daniel Biltz, and  
6 Mr. Biltz and Johnny Webb are present, along with myself.

7 Q. (By Mr. Johnson) Let me get a couple of things  
8 out of the way that we have to do. They needed a  
9 different release for your medical records.

10 A. All right.

11 Q. So you want to look through that and make sure  
12 it's all --

13 MR. BILTZ: So what medical do you have?

14 MR. JOHNSON: I don't --

15 MR. BILTZ: Oh, TDCJ medical records?

16 MR. JOHNSON: Right. They -- the release  
17 you signed last week, they wouldn't accept that for the  
18 medical records needed for that. I don't have any --

19 MR. BILTZ: Are there any medical issues  
20 that we're concerned about while you were at TDC?

21 MR. WEBB: I mean, just what I stated on  
22 record before. I only went to TDC. So, I mean --

23 Q. (By Mr. Johnson) Did you ever get beat up or  
24 anything or --

25 A. Sure.

1 Q. Well, that would be in there, then. I don't  
2 know.

3 MR. BILTZ: I don't see there being any --

4 MR. WEBB: They tried to kill me twice.

5 MR. BILTZ: Aryan Brotherhood or just  
6 somebody in there?

7 MR. WEBB: Yeah.

8 MR. JOHNSON: Bob just sent that to me  
9 yesterday.

10 MR. BILTZ: Okay.

11 MR. JOHNSON: And said, "Did you get this  
12 signed?"

13 MR. BILTZ: Yeah. I have no objection to  
14 this. Honestly, I would like to see every record we  
15 could get from TDCJ.

16 MR. JOHNSON: I will tell you this, they  
17 got the commissary records in, and they -- they --

18 MR. BILTZ: The written pieces of paper,  
19 the little, "This payment came from" stuff?

20 MR. JOHNSON: I got one page of it. I  
21 just got it last night.

22 A. I never lied to y'all, and I don't want no --

23 Q. (By Mr. Johnson) Well, we're not even accusing  
24 you of that.

25 A. I'm just saying (inaudible) --

1           Q.    But you have to understand, everything you say,  
2           though, will be challenged.

3           A.    Sure.

4           Q.    And so we have to corroborate everything that  
5           you say --

6           A.    So let me ask you this:  Is he going to be my  
7           attorney that's going to represent me if this comes to  
8           court, or what's going to happen?  I mean --

9                   MR. BILTZ:  Who?  What?  Well, I mean,  
10          this will never go -- I mean, if this comes to court -- I  
11          mean, this will never, quote, go to court.  I mean,  
12          you're not going to be charged -- and that's why, as this  
13          develops, when we can document everything, that's when we  
14          reach out to the Feds and try to get you immunity so that  
15          you don't -- you will not have to worry about being  
16          charged with anything.  And you're not the one that's  
17          going to get in trouble over this.

18                   MR. WEBB:  Okay.

19                   MR. BILTZ:  And so that's why I think the  
20          way we want to do this is --

21          A.    The whole thing is, the only reason they're  
22          charging me with the crime I'm with now is to shut me up,  
23          and that's what I don't understand.

24          Q.    (By Mr. Johnson) Well, that's what --

25                   MR. BILTZ:  Well, and that's what I'm here

1 for. You know, that's my job, is to make sure that you  
2 don't get put in jail for the rest of your life on this  
3 bullshit case.

4 Q. I just printed one page off (inaudible) it was  
5 like -- what, is it like 22 pages of (inaudible) and I  
6 haven't even really read it yet. It shows commissary  
7 purchase -- purchases, and then it shows "sendee," which  
8 I guess are people that sent -- who is G. Steele?

9 A. Jason Steele. That's my grandpa.

10 Q. Okay. That's your grandpa because he's  
11 contributing regular too, right?

12 A. Yes.

13 Q. Okay. S. and D. Webb, is that your --

14 A. Shirley and Donald Webb, my mom and dad.

15 Q. Okay. And here's Pierce. Here's Webb, Steele,  
16 Webb, Pierce.

17 A. Does it have the amounts on there?

18 Q. \$50, \$20, whatever. That's --

19 A. Like, every Christmas, they would send me  
20 200 -- 200, 250.

21 Q. And I'm sure it's --

22 A. And the thing is, is Delta Magazine  
23 Subscription Services, the one where he ordered all my  
24 magazines from, I had, like, 20 magazines that I was  
25 getting.

1 Q. Was this part of this -- this money?

2 A. Yes.

3 Q. Okay. Well, this is --

4 A. No, no, no. No, no. It's separate from this.

5 Q. Oh, separate from that. Pierce?

6 A. Yes, Charles Pierce. He ordered it off his  
7 credit card, and it was Delta Magazine -- I got the  
8 letters at the house. I mean, I can show you where it's  
9 from. It's Delta Magazine Subscription Services.

10 MR. BILTZ: Johnny doesn't live far away.  
11 We can zip by there in five minutes.

12 MR. JOHNSON: That's what I'm hoping we  
13 can do here in a minute. Anyway, you want to keep that?

14 MR. BILTZ: No. He can hold onto that.

15 A. And I've got the shirt with the blood on it.

16 Q. (By Mr. Johnson) Okay.

17 A. I mean, everything that I've said is exactly  
18 the way it was. I even got some people that are going to  
19 help me do a reenactment, if that's what you want, to  
20 show you exactly what happened.

21 MR. BILTZ: As long as I don't have to be  
22 (inaudible).

23 MR. WEBB: Huh?

24 MR. BILTZ: As long as I don't have to be  
25 Billy Ray during the reenactment.

1 Q. (By Mr. Johnson) Okay. This truck that you  
2 bought when you got the 10 grand is a 1991 Chevrolet  
3 Cheyenne? I don't -- I'm not familiar with the Cheyenne.  
4 I'm not --

5 A. It's not a Cheyenne. It was a Silverado.

6 Q. Scottsdale Silverado.

7 A. Uh-huh.

8 Q. Okay. Was that new when you got it?

9 A. No. It was used. It was used. I paid 7250  
10 for it, and I spent another \$1,000 on getting the racing  
11 motor put in it.

12 Q. Getting what?

13 A. A racing motor.

14 Q. A thousand dollars extra?

15 A. Uh-huh. Well, that was later on. Mr. Pierce  
16 had to --

17 Q. Oh, okay.

18 A. He gave me the money to do that, too.

19 Q. Well, here -- here's the question I saw when I  
20 was pulling up these records. It says that that truck  
21 was registered to you from 9 -- September 4th, 1997.  
22 When did you get out?

23 A. I guess '98.

24 Q. What?

25 A. '98.

1 Q. Huh. Let me look at it. I don't know why they  
2 have '97 on there. Okay. It says title holder is Johnny  
3 Webb, 712 North 23rd.

4 A. My parole records -- my parole records show  
5 when I got out.

6 Q. I don't have any of those with me. Okay.  
7 "Original title date, 7/8/1998." Does that sound right?

8 MR. BILTZ: July 8th?

9 Q. July 8th, 1998?

10 MR. BILTZ: Summer of '98.

11 A. Yeah.

12 Q. Okay. The question was, it says lienholder,  
13 the First State Bank of North Texas in Corsicana. Was  
14 there a lien on that truck?

15 MR. BILTZ: Like, was there a balance that  
16 you owed or did you pay --

17 A. Wait a minute. Wait. When I -- when I got the  
18 truck, I took a loan out on it to move to Houston and to  
19 go to the Ocean Corporation, where Mr. Pierce told me to  
20 go, to go to diving school. Now, my mom said she called  
21 the Ocean Corporation, and they said that that  
22 (inaudible) was never paid, that he never paid it.

23 Q. On the truck?

24 A. No, on the diving course. So my mom and dad  
25 had went back and paid my lien.

1 Q. On the truck?

2 A. Yeah, by a check Mr. Pierce gave my mom and  
3 dad. See, when you get Pierce's records, you're going to  
4 see all this. He gave them the money to pay off my loan  
5 because when I went to jail in Houston, they took my  
6 truck. In order to get it back, Mr. Pierce had to give  
7 them a check to go get my truck back.

8 Q. Okay. Let me -- let me back up so I'm clear  
9 about this.

10 A. This is the wrong year. Of course (inaudible).

11 Q. On this date -- particular day, you and Shidel  
12 Shaw (phonetic), you go see Jackson. He gives you this  
13 check --

14 A. No, Pierce. Pierce. Pierce.

15 Q. Pierce. Pierce gave you the check.

16 A. Yes.

17 Q. Okay. I misunderstood that. I thought Jackson  
18 had given you the check --

19 A. No.

20 Q. -- but Pierce had written it.

21 A. No. Pierce gave me the check.

22 Q. Pierce gave you the check.

23 A. He said, "Here's the money John told me to give  
24 you." He said, "Here's 10 grand. This will help you  
25 out."



1 Q. Okay. So you took that check to the bank.

2 A. Yes, I did.

3 Q. Which bank was it? Was it the --

4 A. The one it was written on.

5 Q. First State Bank? Okay.

6 A. I guess -- no, right here, Community --

7 MR. BILTZ: Community National on --

8 A. Community National. That's where Chuck Pierce  
9 banked at, was right here.

10 Q. Community National Bank?

11 MR. BILTZ: Well, it's --

12 A. Yeah, yeah, yeah.

13 MR. BILTZ: -- right down here on 15th.

14 A. Right here on 15th. That's where he banked at.  
15 I took several checks there and cashed them in his name  
16 because he gave them to me.

17 Q. No. I'm talking about on this particular day  
18 when he gave you \$10,000.

19 A. Uh-huh.

20 Q. Okay. So then you --

21 A. I went there -- actually, what I did was, is  
22 when I went there and cashed that check, I got a  
23 7250-dollar bank draft to go buy that truck, and then I  
24 got a thousand dollars in Travelers Checks, and I had to  
25 register the tags. And a week later, he gave me another

1 1250 to get my motor in my truck -- or a thousand. I  
2 mean, it was either a thousand or --

3 Q. You got a 7250-dollar bank draft --

4 A. Uh-huh.

5 Q. -- a thousand dollars in Travelers Checks, and  
6 the rest was cash?

7 A. I think so.

8 Q. Yes.

9 A. It might have been the other way around. It  
10 might have been (inaudible) --

11 Q. You go down and --

12 A. -- in Travelers Checks.

13 Q. You go down and buy the truck.

14 A. Yeah.

15 Q. You give him this draft and drove off with it,  
16 is that --

17 A. Yeah.

18 Q. Okay.

19 A. I went to Dennis Cooper, and Mr. Pierce told  
20 them to give me a year's insurance on that truck.

21 Q. Okay. I'm trying to work back to where this  
22 lien came into effect --

23 A. The lien --

24 Q. -- on the truck.

25 A. -- came into effect later on, like, a month

1 later, because I couldn't get in touch with Mr. Pierce  
2 because he was gone, so I took a lien out on the truck.  
3 I took a loan at Sun Loan.

4 Q. At where?

5 A. Sun Loan.

6 Q. Sun Loan?

7 MR. BILTZ: S-U-N, Loan.

8 A. Just sun Loan.

9 MR. BILTZ: Is that a payday, sort of,  
10 loan deal?

11 MR. WEBB: Just a loan.

12 Q. (By Mr. Johnson) Okay. So how is Sun Loan  
13 connected with First State Bank?

14 A. I don't know. (Inaudible) I don't know.

15 MR. BILTZ: Well, I mean, you had title to  
16 the truck. You went to this --

17 MR. WEBB: Yeah.

18 MR. BILTZ: -- loan company and said,  
19 "Here's the title. How much money will you give me for  
20 it and" --

21 MR. WEBB: No, I just -- I just borrowed  
22 -- I think I borrowed -- on the truck, I just borrowed  
23 500 bucks.

24 MR. BILTZ: Okay.

25 MR. WEBB: I didn't borrow much. I just

1 borrowed enough to make me until I can get back with Mr.  
2 Pierce again.

3 Q. (By Mr. Johnson) Okay.

4 A. He went to -- I'm thinking he went to Chicago  
5 for a board meeting for Proctor & Gamble, I'm thinking.  
6 I don't remember. I mean, I really don't, so I don't  
7 need to say that, but he went somewhere other than there.

8 Q. Okay. So now that's how the truck got --

9 A. He might have went to his son's in Florida.

10 (Phone rings)

11 MR. WEBB: Hello? Hey, just hold on, man.  
12 I'm sitting in a lawyer's office. Okay? So just hold  
13 on. Huh?

14 MR. JOHNSON: Get off that phone. The  
15 conversation is being recorded.

16 MR. WEBB: No, I'm in a small -- I need to  
17 get back to these attorneys real quick, man, so -- it  
18 says St. John's Epis- --

19 (Recording stops)

20 Q. (By Mr. Johnson) Okay. We're back on the  
21 record.

22 A. Okay.

23 Q. So you -- you take out this little title loan  
24 on your truck --

25 A. Yeah.

1           Q.    -- because your truck -- you had the full title  
2   to it --

3           A.    Sure.

4           Q.    -- when you walk out that day?

5           A.    Absolutely.

6           Q.    Okay.

7           A.    And Shaw was with me that day.

8           Q.    Right.

9           A.    We went together to buy that truck.

10          Q.    Okay. Well, that's where I got confused,  
11   because when I saw the lien on it, I was under the  
12   impression it had been paid in cash, but then I see a  
13   lien on it --

14                   MR. BILTZ: Right. You think there was a  
15   balance or something on it that --

16          Q.    Okay. So -- so Pierce never paid that loan  
17   off?

18          A.    Yes, he did.

19          Q.    Oh.

20          A.    Because they took my truck, and my mom and dad  
21   didn't have the money for it.

22                   MR. BILTZ: And that was down in Houston?

23                   MR. WEBB: Yes.

24                   MR. BILTZ: So when you picked up that  
25   (inaudible) in Houston, your truck got repoed?

1 MR. WEBB: Yeah. By Sun Loan here.

2 MR. BILTZ: Oh, okay.

3 MR. WEBB: And they brought it all the way  
4 back to Navarro County. And my mom and dad said, "Well,  
5 we don't want to lose the truck." And I said, "Well,  
6 then, go to Mr. Pierce and ask him for the money to get  
7 it out," and he gave them the money.

8 Q. (By Mr. Johnson) The truck was impounded by Sun  
9 Loan, not the authorities, right?

10 A. No, not the authorities.

11 Q. Sun Loan gets it, brings it back up here, and  
12 then your parents get money from Pierce to --

13 A. Get it out.

14 Q. -- pay off the lien that you had taken out on  
15 it --

16 A. That's right.

17 Q. -- and get the truck back?

18 A. That's right.

19 Q. Okay. And then you, what, later sold it in  
20 2000, something like that?

21 A. I didn't sell it. I was in prison. My dad  
22 did.

23 Q. Okay. Your dad sold it.

24 MR. BILTZ: Unbeknownst to you? Because  
25 your mom said that wasn't -- that created a little bit of

1 friction, right?

2 A. Yeah, it created a lot of friction. But, I  
3 mean, (inaudible) in prison.

4 MR. BILTZ: Yeah.

5 Q. (By Mr. Johnson) Okay. That -- that  
6 explains --

7 MR. BILTZ: Trying to figure out what the  
8 story was --

9 MR. JOHNSON: Trying to figure out what  
10 the story was.

11 (Speaking simultaneously)

12 MR. JOHNSON: What's the date today?

13 UNIDENTIFIED SPEAKER: The 27th.

14 MR. JOHNSON: All right.

15 (Speaking simultaneously)

16 MR. WEBB: Oh, excuse me.

17 UNIDENTIFIED SPEAKER: That's all right.  
18 You're good.

19 MR. JOHNSON: Okay. That's out of the  
20 way.

21 A. So is this going to be, like, to prove that I'm  
22 not telling the truth or, I mean, that I'm (inaudible)  
23 fucked up?

24 Q. (By Mr. Johnson) Okay. I'm --

25 A. Okay. What's the real deal here?

1 Q. As I understand it -- and I'm just the  
2 investigator -- you got a lot of lawyers working on this  
3 thing, right? Your story makes sense, but with your  
4 criminal history --

5 A. Okay.

6 Q. -- they will try to impeach your testimony.

7 A. Okay.

8 Q. And say, "He -- you know, he's lied before.  
9 He's lying now." But if we get corroboration to  
10 authenticate and support your story, that's what all  
11 those releases were for. No one said we don't believe  
12 you, but there's going to be people saying you were  
13 lying.

14 A. Well, you know, this is the thing: If I'm  
15 lying so much, then why did they pay me? In this whole  
16 thing, they paid me to lie. So now that I'm coming out  
17 with all this information, that's something that's never  
18 come out before.

19 Q. Right.

20 A. So, I mean, that's -- that's got to do  
21 something for -- as far as -- I never wanted --

22 Q. This is just my opinion --

23 A. I never wanted to kill this guy. I never  
24 wanted to do this.

25 Q. Right.



1           A.    I told them from the beginning.  I said, "I  
2   don't want to do this."  I called the FBI, and I told  
3   them, "I don't want to testify.  They're forcing me to  
4   testify on this guy."  They didn't come see me until I  
5   was in prison, man.  Then I'm at their mercy.  I'm not at  
6   my mercy no more.  I'm not at anybody else's mercy.  I'm  
7   at the justice system's mercy.

8           Q.    You talking about the Feds at this point?

9           A.    The FBI came to see me at --

10                  MR. BILTZ:  At TDC.

11           A.    -- in -- at -- at -- at ETM Unit.

12           Q.    Okay.

13           A.    They came and seen me, and they said, "Look,  
14   what's the deal?"  I said, "Look, man, I'm scared to say  
15   anything now.  I don't want to" --

16                  MR. BILTZ:  "I'm here in prison.  I'm not  
17   going to tell you now."

18           A.    And the thing is that John Jackson's buddy was  
19   the IAD guy on there, the guy at Singh.  I mean, he told  
20   me, he said, "John Jackson told me to come see you.  
21   We're going to help you, but you've got to stick to what  
22   you said."

23                  MR. BILTZ:  So some Internal Affairs guy  
24   was --

25                  MR. WEBB:  Yeah, with TDC, man.

1 MR. BILTZ: Are you talking about a guy  
2 named Chaney?

3 MR. WEBB: No. I'm talking about a guy  
4 named Metcalf or some -- it started with an "M." McCliff  
5 or -- oh, God, what's his name? He was from IAD in TDC.  
6 His name was McCliff or -- I mean, something like that,  
7 something -- "M" something. It's with a "C." McCaffey,  
8 McCuffey, something like that.

9 Q. (By Mr. Johnson) Okay.

10 MR. WEBB: I can't remember the guy's  
11 name. I only seen him a couple of times, but he told me,  
12 he said, "Look, we're going to protect you," and they  
13 still almost got me hit twice.

14 Q. Okay. Let me back up a second so we can keep  
15 this thing in chronological order for my benefit.

16 When you first called the FBI, were you  
17 still in Navarro County?

18 A. Yes. I was in Navarro County Jail in the  
19 basement on their phone calling them and telling them,  
20 "Look, they're forcing me to testify."

21 Q. This -- this is pretrial?

22 A. Pretrial. I even told Willie and them. I  
23 said, "They're going to force me to testify against you,  
24 man."

25 Q. What did he say to that?

1           A.    Nothing.  Hell, they almost put me in the same  
2   damn visitation booth with him one day.  He said, "Why  
3   are you doing this, man?"  I said, "They're forcing me,  
4   dude.  Come on."  Me and him had that conversation.

5           Q.    Okay.  So you testify, you go to prison.  
6   You --

7           A.    Yeah, and the powers that be were protecting  
8   me, and if I didn't do what they said do, then they  
9   weren't going to protect me anymore.

10          Q.    They weren't going to protect you physically in  
11   prison, right?

12          A.    Right.

13                   MR. BILTZ:  So what did they do to enhance  
14   your security profile in prison after you visited with  
15   them?

16                   MR. WEBB:  Put me in segregation, you  
17   know, 24-hour lockdown.

18          Q.    Okay.

19                   MR. WEBB:  Come on, now --

20                   MR. BILTZ:  You did the rest of it in seg?

21                   MR. WEBB:  It was fucked up.  Yeah.

22                   MR. BILTZ:  And that's how they protected  
23   you?

24                   MR. WEBB:  Yeah.

25                   MR. BILTZ:  Putting you in solitary?

1 MR. WEBB: Yeah.

2 Q. (By Mr. Johnson) So did you -- did you write  
3 letters to --

4 A. Absolutely.

5 Q. Well, okay. Let me finish my question, before  
6 you -- back to Jackson, saying --

7 A. Sure.

8 Q. -- "This is what's going on down here."

9 A. Yes.

10 Q. "People are trying to kill me."

11 A. Yes.

12 Q. "Threatening me."

13 A. Yes.

14 Q. So he turns around, then, and --

15 A. And that's when that guy came in from the IAD,  
16 McCaffrey, or whatever his -- because I was on East  
17 (inaudible), high security, out there in the little  
18 building, seged up. And, you know, it -- it was fucked  
19 up. It was -- bottom line, I hate to use that language,  
20 but that -- it was messed up, man. I mean, you had --  
21 oh, my God, man, you had shit chunkers and piss -- it  
22 was --

23 Q. So your --

24 A. It was --

25 Q. Those are private letters you sent Jackson --

1 A. Sure.

2 Q. -- and he sent you letters back?

3 A. Sure.

4 Q. Okay.

5 A. Absolutely. And I'm trying to find those, and  
6 I want to give those to y'all. I want to give y'all  
7 pictures of them. I want to keep the actual letters, but  
8 I will more than gladly give you the pictures of the  
9 letters. I don't have a problem with that. But this is  
10 the thing, I've got to find those now. I've got, like,  
11 15 boxes of letters to go through to find all of those  
12 letters, and there's some of them there in my bookcase.  
13 I had one that I showed Crystal, my new -- my wife, and I  
14 showed her what John Jackson wrote me. He told me, he  
15 said, "Look, man, I'm doing everything I can. I am  
16 trying to get you a -- a" --

17 Q. Clemency.

18 MR. BILTZ: Yeah, the part of the  
19 clemency?

20 A. Yeah, and they -- they did file that. He did  
21 file that.

22 Q. Right.

23 A. And back then Bush wouldn't do it because they  
24 thought it was a Democratic trick. That's what they told  
25 me. I don't know what -- I don't know what happened.

1 You know, I just know that they filed a clemency, and I  
2 got those clemency papers and (inaudible).

3 MR. BILTZ: So is Jackson a liberal?

4 MR. WEBB: No. He's a Democrat.

5 MR. BILTZ: (Inaudible)

6 MR. WEBB: And Bush was a Republican.

7 And, see, his first -- the first Bush helped some black  
8 guy, and it ended up fucking him in the ass, so they  
9 didn't want to help me at all.

10 Q. (By Mr. Johnson) Okay.

11 A. And it was a murder case, same thing. So they  
12 didn't want to help me at all, and -- but he tried. I  
13 mean, I give him that. He did. He tried.

14 MR. BILTZ: Well, they did everything they  
15 said they were going to do, in terms of helping you out,  
16 you know.

17 MR. WEBB: (Inaudible) wasn't really  
18 guilty because now there's another guy coming forward  
19 saying he was there and --

20 MR. BILTZ: Well, it doesn't matter if he  
21 was guilty or not. What matters is they -- they fucked  
22 up his chance at trial. Guilty, not guilty, we'll never  
23 know now.

24 (Speaking simultaneously)

25 MR. WEBB: So why? I mean, why did all

1     these things happen to convict this guy? Because I was  
2     under the impression -- I mean, he had me believing  
3     100 percent this dude was guilty. That's why I testified  
4     about it, but, you know, I mean, the perks was some of  
5     it, too. I mean, I ain't going to lie about that. You  
6     know, they was willing to help me. They was willing to  
7     do anything they could for me. You know, no one has ever  
8     done that, so I mean, why wouldn't I help them?

9           Q.     (By Mr. Johnson) Well, but it -- it was still  
10    false testimony, right?

11          A.     Sure. Absolutely. The dude never told me  
12    nothing.

13          Q.     Okay. Please realize that I got in late  
14    in this whole thing. This thing has been going on for  
15    years.

16                   (Speaking simultaneously)

17                   UNIDENTIFIED SPEAKER: I got here a few  
18    years ago. Okay. Yeah, yeah.

19                   UNIDENTIFIED SPEAKER: I flew back to  
20    Corsicana. I'm like, "Willingham, what's this shit  
21    about?"

22          Q.     (By Mr. Johnson) When you testified at trial --

23          A.     This ain't the only case, though. This ain't  
24    the only case.

25          Q.     No. Let -- let me try and get a timeline

1       straightened out in my own mind. When you testified  
2       against Willingham, you were in county still. You had  
3       not been to prison yet.

4             A.    No.

5             Q.    Okay. Did you -- were the bench warrants  
6       issued that brought you back to Navarro County?

7             A.    Yeah.

8             Q.    What did they bring you back for?

9             A.    That was later on.

10            Q.    I know, but what were they -- what were they  
11       for? Do you know?

12            A.    They brought me back to Navarro County to  
13       protect me.

14            Q.    For what?

15            A.    To protect me.

16            Q.    Okay. Do you know how many times that  
17       happened?

18            A.    Once.

19            Q.    Once?

20                   MR. BILTZ: How long were you here?

21                   MR. WEBB: I don't know.

22                   MR. BILTZ: So you got bench warranted  
23       back to the county. You stayed over here for a year or  
24       so, and they sent you back to TDC?

25                   MR. WEBB: Well, they bench warranted me



1 back here because the Willingham thing was going on, and  
2 they wanted me to testify -- they brought me back here  
3 because -- well, this is the whole thing, that Rob  
4 Dunn -- Rob Dunn, I don't even understand why he  
5 represented Willingham, because he had been my attorney  
6 before. That created a conflict of interest, but the  
7 thing is, is that Rob Dunn was in it with all these  
8 people, man.

9 Rob Dunn was in with Bub Douglas and the  
10 DA's back when they caught them stealing all that  
11 equipment here in Corsicana, and they convicted Keith  
12 Sullivan. He's a house mover here, and they found all  
13 this buried equipment from the City barn on his land.  
14 They were stealing barn -- I mean, heavy equipment and  
15 burying it.

16 MR. BILTZ: Bob --

17 MR. WEBB: -- and digging that shit up  
18 later on and selling that shit, and --

19 MR. BILTZ: Bob was involved. Is this the  
20 story Bob was telling us?

21 MR. JOHNSON: Yeah, because he was  
22 representing one of those --

23 MR. WEBB: My dad was involved back in --  
24 we owned a place in Bazet (phonetic) out on Wood Springs  
25 Road, and they had a D-9 Caterpillar buried out there.

1 Well, one night they came and they dug that  
2 son-of-a-bitch up, and they hauled that son-of-a-bitch  
3 off, and that was that.

4 Q. (By Mr. Johnson) "They," being who?  
5 Somebody --

6 A. I was a kid. I don't know.

7 MR. BILTZ: Some grownups out there  
8 digging it up and --

9 A. (Inaudible) and it was gone. I mean, I  
10 remember seeing the trailer and the diesel and  
11 everything, hauling it off. It was gone. But Keith  
12 Sullivan and them -- Keith Sullivan -- Mr. Sullivan was  
13 the one that took the rap for Rob Dunn, Bub Douglas and  
14 the DA back then, which was Pat Bachelor, and he got the  
15 time. No one else got the time, and they were all  
16 involved.

17 Q. You're saying the judge and the DA were part of  
18 this --

19 A. They knew it back then.

20 Q. -- part of the theft train?

21 A. They knew it back then.

22 Q. They knew it or --

23 MR. BILTZ: Who is "they"?

24 A. Keith Sullivan was the one that was involved in  
25 all that. He took the time for them guys. How else you

1 going to steal City equipment without somebody not seeing  
2 you? And that's the thing, Joe Graves, the deputy  
3 commissioner -- not only that, Watkins Construction, his  
4 son killed his wife, throwed her over a bridge with a  
5 chain around her, and he's never been convicted, but he  
6 done it. This is a -- you don't understand --

7 Q. No, I don't.

8 A. -- how deep this --

9 Q. I'm not -- I really don't understand all  
10 this --

11 (Speaking Simultaneously)

12 A. This is all corrupt --

13 MR. BILTZ: No, that's -- it was -- I'm  
14 trying to think who -- Jerry Mac or whoever, he -- the  
15 Watkin's Construction Company's local (inaudible), I grew  
16 up with -- with some of them, but apparently one of them  
17 little trophy wife turns up missing one night after a  
18 little argument, and somebody --

19 A. He was at VFW drinking with us that night  
20 telling us he was going to fuck his wife off, and they  
21 never took our statements.

22 MR. BILTZ: And somebody -- the wife gets  
23 thrown off the bridge over at the lake on 287, tied down  
24 with cinder blocks. Well, whoever did that didn't  
25 realize that cinder blocks will saturate and then float,

1 and the body ended up floating up --

2 UNIDENTIFIED SPEAKER: Whoops.

3 MR. BILTZ: -- and then he gets charged --

4 (Speaking simultaneously)

5 MR. BILTZ: -- and the case got

6 transferred to another -- Smith County --

7 MR. WEBB: But who's (inaudible) the  
8 boyfriend?

9 UNIDENTIFIED SPEAKER: Who? What  
10 boyfriend? Which one?

11 MR. WEBB: The one that killed his wife.  
12 Who is his boyfriend now?

13 MR. BILTZ: You mean girlfriend?

14 MR. WEBB: No, no, boyfriend.

15 MR. BILTZ: I don't know.

16 MR. WEBB: Who is the chief of police?  
17 Lewis Palos.

18 MR. BILTZ: Is his boyfriend?

19 MR. WEBB: I can't believe you don't know  
20 that. That's screwed up.

21 MR. BILTZ: Yeah.

22 MR. WEBB: He's gay.

23 MR. BILTZ: Well, that's neither here nor  
24 there. We're getting way off.

25 UNIDENTIFIED SPEAKER: Off base.

1 Q. (By Mr. Johnson) Yeah. Okay. Let's get back  
2 to the bench warrant. Do you remember when that was,  
3 what year?

4 A. No, I don't.

5 Q. But --

6 A. I'm not going to lie and say I know.

7 Q. I know.

8 A. I don't remember.

9 Q. Okay. But they kept you in Navarro County for  
10 your protection for how long, about a year or --

11 A. I don't remember. They kept me here for a  
12 while.

13 Q. Then they -- then you got sent back down and --

14 A. And I was paroled.

15 Q. How long before parole is this that you --

16 A. I don't remember.

17 Q. Don't know. Okay. I don't expect you to  
18 remember all these dates, but --

19 MR. BILTZ: Because you went down in '92.

20 A. The records will show it. I mean, I don't  
21 even --

22 Q. Yeah.

23 A. I just remember what happened. I don't  
24 remember the dates. I don't remember everything like  
25 that, but I remember exactly what happened.

1 Q. But to your mind, it was only one time, and  
2 Jackson gets his bench -- bench warrant --

3 A. Well, see, they called me up -- when I was  
4 still in jail here waiting to go to TDC, they called me  
5 up in front of Judge Bub Douglas, and he said, "We have  
6 information that you want to change your story." And I  
7 was so screwed, I said no, because I had been telling  
8 them I wanted to change my story.

9 MR. BILTZ: Before -- this is after the  
10 trial, after the Willingham trial?

11 Q. (By Mr. Johnson) After the trial and before you  
12 went to prison?

13 A. Yes.

14 MR. BILTZ: So Douglas brings you into  
15 open court on the record, and then you said, "No, I don't  
16 want to change my story"?

17 MR. WEBB: (Inaudible) because I was  
18 scared to death. I mean, I didn't know what to do. The  
19 Feds -- I had called the Feds. The Feds didn't come. I  
20 mean, I tried to reach out to certain people, and my dad  
21 told me, "Shut your mouth. You know, you're dealing with  
22 people that will kill you, so you need to stick to your  
23 story." And these people will kill you. Hell, they kill  
24 their wives and get away with it. Why can't they kill me  
25 and get away with it?

1           Q.     (By Mr. Johnson) Okay. So you go before the  
2 judge. He ends up sending you back -- or down, then some  
3 period later Jackson gets the bench warrant issued.

4           A.     The lady that was in my case said, "Look, this  
5 ain't right. He didn't rob me. I don't want him to do  
6 no more time," because I didn't rob her. I never was --

7           Q.     Okay.

8           A.     -- robbing this lady, and they brought me back  
9 and she signed the affidavit and everything saying, you  
10 know, he's done too much time. It shouldn't -- this  
11 ain't right. You need to let him out, because the whole  
12 thing about them convicting me for the robbery was  
13 because my dad's guns got stole out of his house.

14          Q.     Right.

15          A.     And the thing was is that, you know, I was on  
16 drugs, man, you know, and they wanted me off the streets,  
17 and my mom and dad didn't want me to die on the streets.  
18 You know what I'm saying? But my mom really wasn't as  
19 much involved as my dad was. My dad and (inaudible)  
20 Izabel, which is a guy that owns a big -- big real estate  
21 company in Dallas, he said -- I went there and worked for  
22 him.

23                   See, that's the whole thing about this  
24 deal with Mr. Pierce. There's a time lapse in there when  
25 I was living in Dallas working for Camille, my cousin.

1 And, you know, I didn't need Mr. Pierce. You know, I was  
2 trying to do it on my own, and --

3 MR. BILTZ: This is after you get out of  
4 jail on the agg robbery --on the robbery?

5 MR. WEBB: No. This was before --

6 MR. BILTZ: This is before --

7 (Speaking simultaneously)

8 MR. WEBB: -- the agg robbery happened.

9 MR. BILTZ: Okay.

10 MR. WEBB: (Inaudible) said, "Well, look,  
11 put him in jail for robbery, and we'll get the person  
12 that works for me to say that she -- you know, he robbed  
13 her, and we'll get him off the streets for a little while  
14 and we'll get him clean." But then the Willingham thing  
15 come up, so they hurried and convicted me, and then my  
16 dad said, "Wait a minute. What the fuck? You know, this  
17 ain't right because he didn't do this."

18 MR. BILTZ: And so the relationship that  
19 you had with Chuck Pierce, you said you didn't need his  
20 help for a while, but prior to that is when you and some  
21 other people were receiving help from Chuck, when y'all  
22 were young, in exchange for --

23 MR. WEBB: Information.

24 MR. BILTZ: -- for information?

25 MR. WEBB: Absolutely.



1                   MR. BILTZ: And then after a while you  
2 didn't need his help. You had a job up in Dallas.

3                   MR. WEBB: Right. But then when the  
4 Willingham thing came up and they had me back in jail,  
5 then he came to me and he said, "Look, I'll help you.  
6 I'll do this, and John Jackson is will to do all these  
7 things for you if you will give his testimony. And John  
8 Jackson told me that himself. He said, "Look, I'll do  
9 this for you. You know, I can use Mr. Pierce to help  
10 you. These are the things that we can do for you."

11                  MR. BILTZ: And that's when he was asking  
12 you what is it you want --

13                  MR. WEBB: He said, "This dude is guilty.  
14 This dude is guilty. There's no doubt. Here's the  
15 pictures." And they laid them out in front of me. And  
16 he said, "Look, there's kids. You got a kid now, Johnny.  
17 What are you going to do?" And because I did have a  
18 child, what am I supposed to do, man? He done killed  
19 three kids. I don't want him out there killing my kid.

20                  MR. BILTZ: Let me ask you this: You told  
21 me that there was one of the pictures, like a burn on the  
22 kid's arms or something?

23                  MR. WEBB: Yeah. That's right.

24                  MR. BILTZ: There would be no way you  
25 would have access to photographic evidence -- you

1 wouldn't be in court, because he's a witness. How else  
2 would he have seen --

3 MR. WEBB: Man, I'm telling you, I went to  
4 John Jackson's office three or four times, and he laid  
5 them pictures out in front of me every time and said,  
6 "Johnny, what do you think about that? That could be  
7 your child. This dude is guilty. I'm either going to  
8 give him 15 and 35, which is the plea bargain, or I'm  
9 going to convict this dude and send him off forever. Do  
10 you want him out there to kill your kid next or do you  
11 want to see him in prison?"

12 MR. BILTZ: So does the project have the  
13 pictures and stuff out of the --

14 MR. JOHNSON: I have no clue.

15 MR. BILTZ: -- out of that Willingham  
16 file?

17 MR. JOHNSON: I --

18 MR. WEBB: I guarantee you I could -- I  
19 could identify the picture. If you just laid it in front  
20 of me right now, I can identify that picture because it's  
21 burned into my memory, man.

22 MR. BILTZ: Because that's -- there's only  
23 one way he would be able to see these to know what these  
24 pictures are. It couldn't be through the trial because  
25 he wouldn't have been in the courtroom during the

1 testimony. Since he's a witness, he's excluded from  
2 being in the courtroom.

3 MR. JOHNSON: He got them out of the  
4 evidence bin and showed them to him and -- or he had  
5 copies made.

6 MR. BILTZ: Well, that's what I'm saying,  
7 the only way he could have seen those pictures if John  
8 Jackson showed them to him.

9 MR. JOHNSON: Right.

10 MR. BILTZ: Yeah. So that would be the  
11 only explanation of why he has knowledge of the content  
12 of those pictures, because he saw them in John Jackson's  
13 office, John Jackson showed him.

14 MR. WEBB: I seen the pictures of the burn  
15 patterns on the floor in front of the door. I mean, he  
16 showed me all that. The burn pattern in front of the  
17 front door, man, it's clear, man. It's clear to me, man.  
18 It's not like it's not there. It's there.

19 MR. BILTZ: Yeah. So you won't forget it.

20 MR. WEBB: No. I have a kid, too.

21 MR. JOHNSON: I'm trying to find all my  
22 notes.

23 MR. BILTZ: Now, one of the things that we  
24 had talked about -- Bob, was asking me, "What was April  
25 Sikes doing while all this was going on?" We talked the

1 other day about it.

2 MR. WEBB: Pretty much not a damn thing.

3 MR. BILTZ: Pretty much not a damn thing,  
4 huh?

5 MR. WEBB: Nothing. I didn't even see  
6 her. You know, I didn't see my attorney. That's the way  
7 Navarro County is, you don't see your attorney. This  
8 dude right here, the time I was in jail, just real  
9 recently, came to see me almost every week. You never  
10 see that in Navarro County, never. These attorneys don't  
11 give a shit about you. They go to that DA's office, and  
12 they talk to them, and they come back and they tell you,  
13 "This is what we're going to give you." That's what it  
14 is. It's trade -- its case trade. They trade cases  
15 here.

16 Q. (By Mr. Johnson) Sure.

17 A. Why?

18 Q. Bartering --

19 A. Innocent people go to prison behind this  
20 bullshit, and --

21 (Speaking simultaneously)

22 MR. BILTZ: What happens around here,  
23 nobody thinks that a prosecutor would put a juror or  
24 anybody in a position to convict an innocent person  
25 (inaudible) clueless.

1           A.    I -- I -- Janet Jacobs at the Corsicana Daily  
2   Sun, when I first got in jail, I said, "Look, I'm an  
3   innocent man. I'm being tried because of the Willingham  
4   case and nothing else." And you know what they told  
5   me -- they told my wife? They told Crystal, they said,  
6   "We're not going to investigate this because you got too  
7   many allegations against the Corsicana Police  
8   Department." Well, guess who funds the Corsicana County  
9   Daily Sun? The Corsicana Police Department.

10               MR. BILTZ: So when you first got picked  
11   up on this case is when that happened?

12               MR. WEBB: Yeah.

13               MR. BILTZ: On this one?

14               MR. WEBB: And she said she would not  
15   report my case because I had too many allegations against  
16   the Corsicana Police Department, and they're the ones  
17   that fund that paper, man. It's all inner-bred here,  
18   man. Everybody knows everybody. Janet Jacobs is kin to  
19   (inaudible) Jacobs, who is the probation officer at the  
20   courthouse. Everybody is in cahoots with everybody. You  
21   can't get a fair trial here, man. If you're guilty in  
22   their eyes, you're guilty. That's the way that is.

23               MR. BILTZ: Yeah, I -- I agree. Around  
24   here, if you come -- if you're the right -- come from the  
25   right family --

1 MR. WEBB: Yeah.

2 MR. BILTZ: -- (inaudible). If you fall  
3 on the wrong side of that, it doesn't matter if you're  
4 guilty or not, they're going to -- they're going to fuck  
5 you.

6 MR. WEBB: That's right.

7 MR. BILTZ: You know, like (inaudible)  
8 these people --

9 (Speaking simultaneously)

10 MR. WEBB: I just had a lady call --

11 MR. BILTZ: -- six people.

12 MR. WEBB: I just had a lady call you  
13 yesterday that's from Tyler. Her daughter is in there,  
14 and she was looking for an attorney. And I said, "You  
15 know what, if you want a good attorney, you need to call  
16 this guy."

17 MR. BILTZ: Did we get that recorded?

18 MR. WEBB: I mean, he --

19 (Speaking simultaneously)

20 MR. WEBB: (Inaudible). And he does come  
21 to see you.

22 UNIDENTIFIED SPEAKER: And Sikes never  
23 did?

24 MR. WEBB: [REDACTED]

25 [REDACTED]

1 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

3 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

4 MR. BILTZ: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED]?

6 MR. WEBB: [REDACTED] [REDACTED] [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED] [REDACTED])

9 MR. WEBB: [REDACTED] [REDACTED] [REDACTED] [REDACTED]

10 Q. (By Mr. Johnson) When Pierce is giving you and  
11 those guys -- I guess you call it --

12 MR. BILTZ: Walking around money.

13 Q. -- walking around money.

14 MR. BILTZ: A little spending money.

15 Q. (By Mr. Johnson) And that was for the -- the  
16 information you were giving them for the PC affidavits?

17 A. Listen, it wasn't information. They would tell  
18 me, "You seen -- (inaudible) substance at this guy's  
19 house." Yeah, I did that.

20 (Speaking simultaneously)

21 Q. But (inaudible) seen it?

22 A. No.

23 Q. Okay. So you -- you made up stories so they  
24 could make their PC affidavit?

25 A. Absolutely.

1 MR. BILTZ: They told you what stories to  
2 make up, and then you would say, "Okay. That's what I  
3 saw."

4 A. Absolutely.

5 Q. Did you -- any statements --

6 A. Absolutely.

7 Q. So you signed statements --

8 A. Sure.

9 Q. -- that were really false statements?

10 A. Absolutely. They were false.

11 Q. And they turned around, and I'm supposed to --

12 (Speaking simultaneously)

13 MR. BILTZ: (Inaudible) informant, protect  
14 his identify.

15 Q. So Pierce is giving you money on a regular  
16 basis --

17 A. I don't even think -- I don't even think he  
18 knew what they were doing. He was like -- I tell you  
19 what, like a kid with a lollipop. Like if a kid behaves  
20 and does good, you give him a lollipop.

21 Q. Right.

22 A. He has his candy. The same way with us. If we  
23 did what they asked us to do, they would say, "Okay.  
24 Mr. Pierce, help him out." And he says -- he had the  
25 money.



1 Q. Okay.

2 A. He would help us.

3 Q. Let me ask you this question: Were you doing  
4 any manual labor for him on his ranch or anything? Was  
5 he -- were you ever employed by him?

6 A. No.

7 Q. You were never employed by Pierce?

8 A. I mean, I probably put him on my application as  
9 an employer because, I mean, he would vouch for me,  
10 but --

11 MR. BILTZ: But you never held a job  
12 for -- for Chuck?

13 MR. WEBB: No.

14 MR. JOHNSON: Okay.

15 MR. WEBB: Hell, his wife used to bake  
16 cookies, man, the best cookies I ever had in my life.  
17 They were macadamia -- white chocolate macadamia cookies,  
18 man, and we would come over, and she would give us those  
19 cookies, man. It was, like, the best cookies.

20 Q. (By Mr. Johnson) So you put him down as an  
21 employer, what, for a credit application or for --

22 A. Sure. I put him down for anything. I mean, he  
23 was a reference. I mean, I could always count on him to  
24 be a reference for me.

25 Q. A while ago you mentioned that he did not pay

1 the note off for the underwater welding school?

2 A. Apparently. That's what my mom said. I don't  
3 know. I haven't even contacted them, but my mom said she  
4 did while I was in jail. I've been trying to go through  
5 the letters and everything else and trying to find shirts  
6 and --

7 MR. BILTZ: Because we -- we requested  
8 your record -- payment records from -- and have yet to  
9 receive them, from the Ocean Corp.

10 MR. JOHNSON: Yeah.

11 A. And I'm telling you right now --

12 Q. Did you ever -- did you ever pay Ocean Corp  
13 yourself?

14 A. I filed for the -- for the --

15 MR. BILTZ: Student aid?

16 A. Pell grant -- yeah, student aid, pell grants.  
17 But Mr. Pierce sent me every month \$4,000 from his bank  
18 account, wired to Ocean Corp, and they would hand me the  
19 check (inaudible), and I would take it to their bank and  
20 cash that son-of-a-bitch. That's how he got through that  
21 loophole.

22 MR. BILTZ: But that wasn't money that was  
23 going towards tuition? That was just --

24 A. No. That was --

25 MR. BILTZ: -- spending money?

1 A. That was living expenses.

2 Q. So you -- the wire would come made payable to  
3 Ocean Corp. They turn around and give you cash --

4 A. No. They give me a check --

5 Q. Okay. Give you a check --

6 A. -- and I would cash it.

7 Q. They give you a check made payable to you.

8 A. Yes.

9 Q. Okay. But that had nothing to do with tuition  
10 or anything like that. That was just --

11 MR. BILTZ: Your living money. You spent  
12 this while you were in Houston?

13 A. Sure. He told me -- hell, he bought me  
14 a Citizens --

15 Q. So you didn't have a bank account. You just  
16 cashed it, right?

17 A. Right. He bought me a Citizens Ocudepth. It's  
18 a diving watch. It's a dive computer for diving. It was  
19 like, I think, 790-something dollars. I mean, back then  
20 that was a lot of money for a watch.

21 Q. Yeah.

22 A. And it was a dive computer, and I could  
23 download it on my laptop and everything. It was pretty  
24 cool. All of my dive tables were in there. It was  
25 really nice. It was a really nice watch. And I bought

1       that at the Galleria.

2           Q.     In Dallas?

3           A.     No.

4                   MR. BILTZ:  No.

5           A.     No, Houston.

6           Q.     Oh, here.  Okay.  You don't have any of those  
7       letters with you right now, do you?

8           A.     No, sir.

9           Q.     Okay.

10                   MR. BILTZ:  You want to run down the  
11       street and -- he's five minutes away.

12                   MR. JOHNSON:  Do you -- well, I want you  
13       to go, too.

14                   MR. BILTZ:  Yeah.  Yeah.  You want to run  
15       down there real quick?

16                   MR. JOHNSON:  (Inaudible.)

17                   (Speaking simultaneously)

18                   MR. BILTZ:  Oh, yeah.  You want to run  
19       down there and grab --

20                   MR. WEBB:  No problem.

21                   MR. BILTZ:  Yeah.  Let's run down and grab  
22       a couple of them.

23                   (Speaking simultaneously)

24                   MR. JOHNSON:  Before I run anywhere, I'm  
25       going to run you up to the --

1

MR. BILTZ: Yeah.

2

MR. JOHNSON: I'll be back.

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1 COUNTY OF BEXAR )

2 STATE OF TEXAS )

3

4 REPORTER'S CERTIFICATION

5

6 I, TINA C. FULLER, Certified Shorthand Reporter in  
7 and for the State of Texas, hereby certify that this  
8 transcript is a true record of the audio recording of the  
9 Interview of Johnny Webb, to be best of my ability.

10 I further certify that I am neither attorney nor  
11 counsel for, related to, nor employed by any of the  
12 parties to the action in which this recording was taken.  
13 Further, I am not a relative or employee of any attorney  
14 of record in this cause, nor do I have a financial  
15 interest in the action.

16 Subscribed and sworn to on this the 24th day of  
17 July, 2014.

18

19

20 Tina C. Fuller, CSR  
21 Texas CSR 3633  
22 Expiration: 12/31/2014  
23 DepoTexas Firm Registration No. 17  
24 Sunbelt Reporting Firm Registration No. 87  
25 1016 La Posada, Suite 294  
Austin, Texas 78752  
512-465-9100

# **APPENDIX 5**

Monday, October 12, 1992

Note: The Judgment has Robbery of the Offense Convicted of and also n/a for the findings of use of deadly weapon. That is what John Jackson wants it to be. But the penal code is 29.03 which is Aggravated Robbery and the degree is 1st which would be a aggravated robbery. If TDC calls and wants to know which one is correct - tell them ROBBERY with No Deadly Weapon Used.

This note is per John Jackson to Marilyn Greer.

*The correct Penal Code would be 29.02  
and the correct degree is a 2nd.*



# **APPENDIX 6**

## MEMORANDUM OF INTERVIEW

In re: Cameron Todd Willingham

To: Barry Scheck, Attorney  
Bryce Benjet, Attorney

From: Max M. Wayman

Date: February 12, 2014

Time: 11:00 a.m.

Location: District Clerk's Office  
Navarro County Courthouse  
Corsicana, Texas 75151

Persons Present: Jill Grounds  
Max M. Wayman

---

1. I traveled this date to the Navarro County Courthouse in Corsicana, Texas to meet with and interview **Jill Grounds (Grounds)** concerning her direct knowledge of facts and circumstances relating to the trial of **Cameron Todd Willingham (Willingham)**. This memorandum summarizes the information we discussed during this interview and therefore reflects my judgment and opinion and is not a literal transcription of the discussion that occurred.

### Background

2. After identifying myself and stating the purpose for my requested interview, **Grounds** stated she is familiar with questions being asked about the **Willingham** trial, "I've provided them (Innocence Project) documents."
3. **Grounds** then confirmed she has been working for the Navarro County District Clerk's Office for several years, even being employed there during the **Willingham** trial in approximately 1992.

### Handwritten Note

4. It was at this time I showed **Grounds** a handwritten note and asked her if she recognized this handwriting.
5. In response, **Grounds** stated, "It's probably the judge's," **Kenneth A. Douglas (Douglas)**, the **Willingham** trial judge.

6. Continuing, **Grounds** said she was familiar with **Douglas's** handwriting, having seen it on numerous occasions at the clerk's office.
7. Continuing to look at the note, **Grounds** then stated, "I think it's his (**Douglas's** handwriting), it looks like something he wrote after he talked to April (attorney **April Sikes (Sikes)**)."
8. Continuing, **Grounds** stated this is the first time she has ever seen this handwritten note.

#### **April Sikes**

9. It was at or about this time **Grounds** stated **Douglas** knew **Sikes** well, based upon the fact she was an assistant district attorney in Navarro County, having left the district attorney's office just prior to the **Willingham** trial.
10. During the trial, **Sikes** represented **Johnny Webb (Webb)**, a witness for the prosecution.

#### **Typewritten Note**

11. It was at or about this time I showed **Grounds** a typewritten note dated "Monday, October 12, 1992" and allowed her to carefully examine the information contained on said note.
12. After reading the note, **Grounds** stated she has never seen this note before, nor does she know whose handwriting is at the bottom of the note, only to speculate, "It was probably written by somebody in the district attorney's office."
13. **Grounds** is unaware of whether or not **Marilyn Greer (Greer)** had communications with the **Willingham** trial prosecutor **John Jackson (Jackson)**.

#### **John Jackson**

14. At no time does **Grounds** recall having discussions with **Jackson** about the **Willingham** trial, or specifics associated therewith.
15. Furthermore, at no time does **Grounds** recall having communications with **Jackson** about **Webb** or the judgment rendered against **Webb**.
16. After serving as an assistant district attorney in Navarro County, **Jackson** become a trial judge and has since retired.

### **Grounds' Signature**

17. It was at or about this time **Grounds** continued looking through documents, such as the stipulation of evidence, as well as the judgment, and identified her signature on the bottom of said documents.

### **Judge Douglas**

18. According to **Grounds, Douglas** "died about ten years ago."

### **Conclusions**

19. It was at or about this time my interview with **Grounds** was concluded on a note, with **Grounds** providing her work number in the event I have additional questions or if anything else surfaces.
20. The work number **Grounds** provided is: (903) 654-3040.

## MEMORANDUM OF INTERVIEW

In re: Cameron Todd Willingham

To: Barry Scheck, Attorney  
Bryce Benjet, Attorney

From: Max M. Wayman

Date: February 12, 2014

Time: 10:23 a.m.

Location: 605 Mockingbird Place  
Corsicana, Texas 75110

Persons Present: Marilyn K. Greer  
Max M. Wayman

---

1. I traveled this date to 605 Mockingbird Place in Corsicana, Texas to meet with and interview **Marilyn K. Greer (Greer)** concerning her direct knowledge of facts and circumstances relating to the trial of **Cameron Todd Willingham (Willingham)**. This memorandum summarizes the information we discussed during this interview and therefore reflects my judgment and opinion and is not a literal transcription of the discussion that occurred.
2. After introducing myself and stating the purpose for my requested interview, **Greer** appeared somewhat reluctant to be interviewed so I quickly began showing her documents and after about five minutes she allowed me in her home and the interview commenced.

### Background

3. Because **Greer** was somewhat reluctant to be interviewed, the background section of this interview was abbreviated.
4. However, **Greer** did confirm she is the former district clerk of Navarro County and held this position during the **Willingham** trial in approximately 1992.

### Handwritten Note

5. It was at or about this time I reproduced the handwritten note for **Greer** to examine and asked her if this note was in her handwriting.

6. After carefully reviewing the handwritten note, **Greer** slowly shook her head side to side, stating, "This is not my handwriting."
7. **Greer** then read the note aloud and after doing so stated that "**April (Sikes (Sikes))** was **Johnny Webb's (Webb)** lawyer" during the **Willingham** trial and is currently a practicing attorney in "Smith County," Texas.
8. I then asked **Greer** if she knew who wrote this note and she replied, "Judge Buck," referring to the **Willingham** trial judge **Kenneth A. Douglas (Douglas)**.
9. After making this comment, **Greer** then stated, "I'm not a handwriting expert, I'm not going to speculate, but it (handwriting) looks like his (**Douglas**)."
10. I then asked **Greer** if she had ever seen this handwritten note before and she again shook her head side to side, stating, "This is the first time I've ever seen this."

#### **Typewritten Note**

11. It is at this time I showed **Greer** a typewritten note dated, "Monday, October 12, 1992."
12. After showing **Greer** the note, she read it carefully, stating she is not familiar with this note and does not recall ever seeing it.
13. I then referenced **Greer** to the part of the note that read, "This is note is per **John Jackson (Jackson)** to Marilyn Greer."
14. After reading this part **Greer** said, at no time does she recall receiving these instructions from then assistant district attorney **Jackson** and does not recall the handwritten note at the bottom of the typewritten section, believing someone in the district attorney's office must have made that reference.
15. Again, **Greer** shook her head side to side, when handing the note back to me.

#### **Judgment**

16. After looking at the judgment, **Greer** stated, "This is something we drew up, but I don't remember it."
17. The information contained in the judgment is something the clerk's office would have received from the district attorney's office.
18. In looking further at the judgment, **Greer** noted it was signed by **Jill Grounds (Grounds)**, as the representative from the district clerk's office.

19. **Greer** then suggested **Grounds** would possibly have more information about this matter than **Greer**; **Greer's** name was used on all documents since she was the district clerk at the time.
20. **Greer** then commented that **Grounds** still works for the Navarro County District Clerk's Office.

### **Johnny Webb**

21. **Greer** is familiar with **Webb**, she recalled him as a "jail house guy who said something about **Willingham**, saying something to him (**Webb**)."
22. **Greer** also recalled there was an alleged threat that someone was "going to try to kill him (**Webb**)."

### **John Jackson**

23. **Greer** recalled **Jackson** being the assistant district attorney trying the **Willingham** case for Navarro County.
24. At this point in time, **Greer** does not recall discussions with **Jackson** about Texas Penal Code Sections 29.02 and 29.03 at any time.
25. However, this is not to say **Jackson** did have said conversations with **Grounds**.
26. Furthermore, at no time does **Greer** recall having communications with **Jackson** about **Webb** or the judgment rendered against **Webb**.

### **Conclusions**

27. It was at or about this time **Greer** stated she was "going to work out" and needed to terminate the interview.
28. However, **Greer** agreed to give me her cellular telephone number in the event I had additional questions at a later date.
29. The cellular telephone number **Greer** provided is: (903) 654-8582.

# **APPENDIX 7**



NO. 00-00-24471-CR

THE STATE OF TEXAS  
VS.  
JOHNNY E. WEBB

IN THE 13TH JUDICIAL  
DISTRICT COURT OF  
NAVARRO COUNTY, TEXAS

JUDGMENT ON PLEA OF GUILTY OR NOLO CONTENDERE BEFORE COURT  
WAIVER OF JURY TRIAL

Judge Presiding: Kenneth A. Douglas  
Date of Judgment: MARCH 10, 1992

Attorney For  
State: JOHN JACKSON

Attorney For  
Defendant: APRIL SIKES

Offense  
Convicted of: OF FELONY (Forgery)  
Penal Code : 32.21  
Degree : 3RD

Date Offense  
Committed: 12-9-91

Terms of Plea  
Bargain (In Detail): District Attorney Recommendation.

Plea to Enhancement  
Paragraph(s): N/A

Findings on  
Enhancement: N/A

Findings on Use  
of Deadly Weapon: N/A

Date Sentence  
Imposed: MARCH 10, 1992

Costs: \$184.50

Punishment and  
Place of Confinement: 10 YRS TDC

Date to  
Commence: 1-9-92

Time Credited: 29 DAYS

Total Amount of  
Restitution/Reparation:  
N/A

Restitution to be Paid to: N/A

Concurrent Unless Otherwise Specified.

Defendant present with attorney APRIL SIKES. Identity fixed. Defendant admonished by Court of consequences of plea of guilty. Defendant waived right of trial by jury in person and in writing with consent and approval of the Court and State's attorney. It plainly appeared that defendant was sane and uninfluenced by any consideration of fear or by any persuasion or delusive hope of pardon, tempting him to confess his guilt. Plea of guilty received to indictment. Evidence showing guilt of defendant introduced in the form of written stipulations and waiver of appearance of witnesses consented to by defendant.

Judgment of the Court that the defendant is guilty as charged in the indictment and that he be punished by confinement in Texas Department of Corrections for a term of 10 years and a fine of NONE; it is further order of the Court that the State of Texas do have and recover of and from the defendant all cost of prosecution for which let execution issue. Sentenced to serve 10 years in the Texas Department of Corrections from 1-9-92. Appellate rights explained.

FILED  
At 8:10 o'clock  
MARCH 10 1992

MAR 10 1992

By *[Signature]*  
Clerk District Court, Navarro County, Texas

*[Signature]*  
PRESIDING JUDGE  
DATE SIGNED: MARCH 10, 1992  
Notice of Appeal: NO

# **APPENDIX 8**

NUNC PRO TUNC  
NO. 00-00-24490-CR

THE STATE OF TEXAS  
VS.  
JOHNNY WEBB

IN THE 13TH JUDICIAL  
DISTRICT COURT OF  
NAVARRO COUNTY, TEXAS

JUDGMENT ON PLEA OF GUILTY OR NOLO CONTENDERE BEFORE COURT  
WAIVER OF JURY TRIAL

Judge Presiding: Kenneth A. Douglas  
Date of Judgment: MARCH 10, 1992  
Attorney For State: JOHN JACKSON  
Attorney For Defendant: APRIL SIKES  
Offense Convicted of: ROBBERY  
Date Offense Committed: 1-1-92  
Penal Code : 29.02  
Degree : 2ND  
Terms of Plea Bargain (In Detail): District Attorney Recommendation.  
Plea to Enhancement Paragraph(s): N/A  
Findings on Enhancement: N/A  
Findings on Use of Deadly Weapon: N/A  
Date Sentence Imposed: MARCH 10, 1992  
Court Costs: \$209.50  
Punishment and Place Of Confinement: 15 YRS TDC  
Date to Commence: 1-9-92  
Time Credited: 29 DAYS  
Total Amount of Restitution/Reparation: NONE  
Restitution to be Paid to: N/A  
Concurrent Unless Otherwise Specified.  
Defendant present with attorney APRIL SIKES. Identity fixed.  
Defendant admonished by Court of consequences of plea of guilty.  
Defendant waived right of trial by jury in person and in writing  
with consent and approval of the Court and State's attorney. It  
~~plainly appeared that defendant was sane and uninfluenced by any~~  
~~consideration of fear or by any persuasion or delusive hope of~~  
~~pardon, tempting him to confess his guilt. Plea of guilty received~~  
~~to indictment. Evidence showing guilt of defendant introduced in~~  
~~the form of written stipulations and waiver of appearance of~~  
~~witnesses consented to by defendant.~~  
Judgment of the Court that the defendant is guilty of included  
offense of Robbery as charged in the indictment and that he be  
punished by confinement in the Texas Department of Criminal Justice  
Institution for a term of 15 YRS TDC years and a fine of NONE: it  
is further order of the Court that the State of Texas do have and  
recover of and from the defendant all cost of prosecution for which  
let execution issue. Sentenced to serve 15 years in the Texas  
Department of Criminal Justice Institution from 1-9-92. Appellate  
rights explained.

*Kenneth A. Douglas*  
PRESIDING JUDGE  
DATE SIGNED: JULY 15, 1996  
Notice of Appeal: NO

CERTIFIED A TRUE COPY  
MAR:LYN GREER  
DISTRICT CLERK, NAVARRO COUNTY, TX

ATTEST: [Signature]  
BY: [Signature]

FILED  
3:25  
At 3:25 clock  
MARILYN GREER M

JUL 15 1996  
*[Signature]*  
Clerk, District Court, Navarro County Texas

# **APPENDIX 9**

no.  
NOTES: 15 yrs. or over

→ April says this was to be incl.  
ofence of falling 2nd  
- based on camp in Willingham -

# **APPENDIX 10**

**AFFIDAVIT**


STATE OF TEXAS       )  
COUNTY OF GREGG    )

BEFORE ME, the undersigned authority, on this day personally appeared, Clifton L. Holmes, who after first being duly sworn, stated and deposed as follows:

“My name is Clifton L. Holmes. I am over 21 years of age and competent and qualified to make this sworn affidavit. I am a resident of Upshur County, Texas and have my primary business address in Longview, Gregg County, Texas. I am a lawyer, duly licensed to practice law in the State of Texas, Bar No. 09907000. I am the past president of the Texas Criminal Defense Lawyers Association and a former member of the Board of Directors of the State Bar of Texas. I am admitted to practice before all United States District Courts in Texas, the United States District Court of Arkansas, the 5<sup>th</sup> and 11<sup>th</sup> U.S. Circuit Courts of Appeal and the United States Supreme Court.

I discussed the attached documents relating to State of Texas vs. Johnny E. Webb, Cause No. 24490-CR, District Court of Navarro County, Texas in detail with April A. Sikes, Attorney of record for Johnny E. Webb, defendant in said cause. After considering same, said attorney April A. Sikes advised me that she had no recollection of the hand-written notation or any of the attached court documents, and did not recall the specifics of the case. She advised me that she no longer had the file or any records pertaining to the cause.

Further affiant sayeth naught.”

  
\_\_\_\_\_  
Clifton L. “Scrappy” Holmes

Subscribed and sworn to before me on this 23<sup>rd</sup> of July, 2014.



  
\_\_\_\_\_  
NOTARY PUBLIC, STATE OF TEXAS  
My commission expires: 8/29/2016

no.  
NOTES: 15 Apr. 1968

→ April says this was to be incl.  
of course of Kolberg. 2nd  
- based on camp in Willingham -



NO. 24490-CR

THE STATE OF TEXAS

IN THE DISTRICT COURT

VS.

OF

JOHNNY E. WEBB

NAVARRO COUNTY, TEXAS

**STIPULATION OF EVIDENCE**

Comes now Johnny E. Webb, the Defendant in the above entitled and numbered cause, in writing and in open court, and consents to the stipulation of the evidence in this case and in so doing expressly waives the appearance, confrontation and cross examination of witnesses. I further consent to the introduction of testimony by affidavits, written statements of witnesses, and other documentary evidence. I further consent and agree to any other stipulations appearing of record herein. Accordingly, having waived my Federal and State constitutional right against self-incrimination and after having been sworn, upon oath, I judicially confess to the following facts and agree and stipulate that these facts are true and correct and constitute the evidence in this case.

Said Defendant in person together with his counsel and the attorney representing the State of Texas agrees and stipulates that he, the said Defendant, is the identical person referred to in the stipulated evidence herein, and if the witnesses herein mentioned were present and testifying under oath they would identify the defendant as the person of whom they speak in said stipulations.

I, the Defendant in this case, judicially confess to the following facts and agree and stipulate that these facts are true and correct and constitute the evidence in this case:

On the 1st day of January, 1992, in Navarro County, Texas, I did then and there while in the course of committing theft, and with intent to obtain property of Shirley McAdams, to wit: a purse, without the effective consent of the said Shirley McAdams, the owner thereof, and with intent to deprive the said Shirley McAdams of said property, I did then and there intentionally and knowingly place Shirley McAdams in fear of imminent bodily injury by using and exhibiting a deadly weapon, to wit: a knife. I further agree that I am one and the same

State's Exhibit #1

CERTIFIED A TRUE COPY

MARILYN GREER

DISTRICT CLERK, NAVARRO COUNTY, TEXAS

ATTEST: [Signature] DATE: 3/1/92

BY [Signature] DEPUTY

PAGE ONE OF TWO

FILED  
MAR 06 1992  
MAR 06 1992

[Signature]  
JAMES EARL GALT, JUDGE

person named in the indictment in this case, and that all allegations contained therein are true and correct.

Johnny E. Wickett  
Defendant

SWORN TO AND SUBSCRIBED before me on this 6 day of March, 1992.

Michele Shumfender  
District Clerk  
Navarro County, Texas

THIS PAGE, AND ALL PRECEDING PAGES OF THIS STIPULATION, ALL UNDER ONE BLUEBACK COVER, APPROVED:

Johnny E. Wickett  
Defendant  
Orville A. Sikes  
Attorney for Defendant

[Signature]  
Attorney for State

[Signature]  
District Judge

No. 92-00-24490-CR

THE STATE OF TEXAS

IN THE DISTRICT COURT

VS.

OF

JOHNNY E. WEBB

NAVARRO COUNTY, TEXAS

**WAIVER OF INDICTMENT**

Now comes Johnny E. Webb, defendant herein, accused of the non-capital felony offense of Aggravated Robbery and represented by his attorney and having been advised by his attorney and by the Court of the nature of the charge against him and of his right not to be tried in this case except on the indictment of a Grand Jury, hereby in open Court and in writing voluntarily and knowingly waives his right to be prosecuted by a Grand Jury indictment and announces his election and consent to be charged by information.

Johnny E. Webb  
Defendant  
April A. Sikes  
Attorney for Defendant

**ORDER**

On this 6 day of March 1992, the above named defendant having appeared before me with his attorney in open Court, and the defendant having been fully advised of his rights and the nature of the charge against him and that he has a right to be prosecuted by indictment by a Grand Jury, the defendant intelligently, voluntarily and knowingly waived such right and the defendant and his attorney signed the foregoing written instrument in open Court, and the Court hereby approves the waiver of indictment and approves prosecution in this case by information.

James H. A. Dwyer  
Judge Presiding

PAGE ONE OF ONE

CERTIFIED A TRUE COPY  
MARLYN GREER  
DISTRICT CLERK, NAVARRO COUNTY, TX  
ATTEST STP M. SLO  
BY RD 202 DEPUTY

NO. 00-00-24490-CR

THE STATE OF TEXAS

IN THE 13TH JUDICIAL

VS.

DISTRICT COURT OF

JOHNNY WERS

HAVARD COUNTY, TEXAS

JUDGMENT ON PLEA OF GUILTY OR NOLO CONTENDERE BEFORE COURT  
WAIVER OF JURY TRIAL

Judge Presiding: Kenneth A. Douglas  
Date of Judgment: MARCH 10, 1992

Attorney For  
State: JOHN JACKSON

Attorney For  
Defendant: APRIL SIXES

Offense  
Convicted of: ROBBERY  
Penal Code : 19.03  
Degree : 1ST

Date Offense  
Committed: 1-1-92

Terms of Plea  
Wagrain (In Detail): District Attorney Recommendation.

Plea to Enhancement  
Paragraph(s): N/A

Findings on  
Enhancement: N/A

Findings on Use  
of Deadly Weapon: N/A

Date Sentence  
Imposed: MARCH 10, 1992

Costs: \$ 309.50

Punishment and  
Place of Confinement: 15 YRS TDC

Date to  
Commence: 1-8-92

Time Credited: 29 DAYS

Total Amount of  
Restitution/Reparation:  
N/A

Restitution to be Paid to: N/A

Concurrent Unless Otherwise Specified.

Defendant present with attorney APRIL SIXES. Identity fixed. Defendant admonished by Court of consequences of plea of guilty. Defendant waived right of trial by jury in person and in writing with consent and approval of the Court and State's attorney. It plainly appeared that defendant was sane and uninfluenced by any consideration of fear or by any persuasion or delusive hope of pardon, tempting him to confess his guilt. Plea of guilty received to indictment. Evidence showing guilt of defendant introduced in the form of written stipulations and waiver of appearance of witnesses consented to by defendant.

Judgment of the Court that the defendant is guilty as charged in the indictment and that he be punished by confinement in Texas Department of Corrections for a term of 15 years and a fine of NONE: it is further order of the Court that the State of Texas do have and recover of and from the defendant all cost of prosecution for which let execution issue. Sentenced to serve 15 years in the Texas Department of Corrections from 1-8-92. Appellate rights explained.

FILED  
MAR 10 1992

MAR 10 1992

Kenneth A. Douglas  
PRESIDING JUDGE  
DATE SIGNED: MARCH 10, 1992  
Notice of Appeal: NO

NRHC PRO TUNG  
NO. 60-60-24490-CR

THE STATE OF TEXAS  
VS.  
JOSEPH WARR

IN THE 12TH JUDICIAL  
DISTRICT COURT OF  
NAVARRO COUNTY, TEXAS

JUDGMENT ON PLEA OF GUILTY OR Nolo Contendere Before Court  
WAIVER OF JURY TRIAL

Judge Presiding: Kenneth A. Douglas  
Date of Judgment: MARCH 10, 1992  
Attorney For State: JOHN JACKSON  
Attorney For Defendant: APRIL SIXES  
Offense Convicted of: ROBBERY  
Date Offense Committed: 1-1-92  
Penal Code : 22.02  
Degree : 2ND  
Terms of Plea Bargain (In Detail): District Attorney Recommendation.  
Plea to Enhancement Paragraph(s): N/A  
Findings on Enhancement: N/A  
Findings on Use of Deadly Weapon: N/A  
Date Sentence Imposed: MARCH 10, 1992  
Court Costs: \$202.20  
Punishment and Place of Confinement: 15 YRS TDC  
Date to Commence: 1-8-92  
Fines Credited: 10 DAYS  
Total Amount of Restitution/Reparation: NONE  
Restitution to be Paid to: N/A  
Concurrent Unless Otherwise Specified.  
Defendant present with attorney APRIL SIXES. Identity fixed.  
Defendant admonished by Court of consequences of plea of guilty.  
Defendant waived right of trial by jury in person and in writing  
with consent and approval of the Court and State's attorney. It  
plainly appeared that defendant was sane and uninfluenced by any  
consideration of fear or by any persuasion or delusive hope of  
pardon, tempting him to confess his guilt. Plea of guilty received  
to indictment. Evidence showing guilt of defendant introduced in  
the form of written stipulations and waiver of appearance of  
witnesses consented to by defendant.  
Judgment of the Court that the defendant is guilty of included  
offense of Robbery as charged in the indictment and that he be  
punished by confinement in the Texas Department of Criminal Justice  
Institution for a term of 15 YRS TDC years and a fine of NONE. It  
is further order of the Court that the State of Texas do have and  
recover of and from the defendant all cost of prosecution for which  
let execution issue. Sentenced to serve 15 years in the Texas  
Department of Criminal Justice Institution from 1-8-92. Appellate  
rights explained.

*Kenneth A. Douglas*  
PRESIDING JUDGE  
DATE SIGNED: JULY 15, 1995  
Notice of Appeal: N/A

325 FILED  
AT THE CLERK'S OFFICE  
NAVARRO COUNTY, TEXAS

JUL 15 1995

CLERK, NAVAL COUNTY, TEXAS

cdg

ATTN: • Jill - Dist. Clerk

OFFICE OF  
**PATRICK C. BATCHELOR**  
ORIGINAL DISTRICT ATTORNEY  
HARRIS COUNTY COURTHOUSE - 1001 RICE AVE.  
HOUSTON, TEXAS 77001

TELEPHONE  
(713) 654-8045  
FAX  
(713) 654-8055

July 15, 1996

Records Department  
Texas Department of Criminal Justice  
P.O. Box 99  
Huntsville, Texas 77340-0099  
Board of Pardons and Paroles  
P.O. Box 13401  
Capitol Station  
Austin, Texas 78711

COPY

RE: WEBB, Johnny JDCJ-ID #626256

Gentlemen,

I have recently received a letter from Johnny Webb which indicates that your records show that he was convicted of the offense of Aggravated Robbery when, in fact, he was convicted of Robbery.

Examination of the records of the District Court disclosed that the original judgment reflected a conviction for Robbery, but also indicated the Penal Code section for Aggravated Robbery.

To clarify this matter, I examined our records, along with the records of the attorney who represented Mr. Webb. Based upon this, I requested that the Court enter a judgment null and void in order to remove any doubt that Mr. Webb should stand convicted of the offense of Robbery, 2nd degree, which is an included offense of that with which he was originally charged.

I would appreciate your taking this information into consideration when computing any parole eligibility.

With best regards,

  
John H. Jackson  
First Assistant District Attorney

cc: Johnny Webb

CERTIFIED A TRUE COPY  
HARLYN GREEN  
DISTRICT CLERK, HARRIS COUNTY, TX  
JUL 16 1996  
BY: [Signature] DEPUTY

1 handle that on my conscience."

2 So it went on about three weeks. He said, "Look, do  
3 you want me to tell someone?" I said yeah. That's when  
4 he said, "Okay. I will tell them what you told me."

5 Q Do you remember the first time I talked to you,  
6 Johnny?

7 A Yes, I do.

8 Q You remember the first thing I told you?

9 MR. MARTIN: Your Honor, we object to  
10 hearsay.

11 MR. JACKSON: I will rephrase the  
12 question, Your Honor.

13 THE COURT: All right, sir.

14 BY MR. JACKSON:

15 Q Do you remember our conversation when I first  
16 met with you over across the street?

17 A Somewhat, yes, I do.

18 Q Johnny, have I ever promised you anything in  
19 return for your testimony in this case?

20 A No, sir, you haven't.

21 Q As a matter of fact, I told you there is  
22 nothing I can do for you.

23 MR. MARTIN: Object. Leading.

24 THE COURT: Overrule the objection.

25 THE WITNESS: You said there was nothing

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that no one can do for me.

BY MR. JACKSON:

Q Do you understand you placed yourself at risk  
by coming forward with this testimony?

MR. MARTIN: Your Honor, we object to  
that as leading, assuming some facts not in evidence.

THE COURT: Go ahead.

MR. MARTIN: There is no evidence  
whatsoever that he has been placed at risk at all in any  
way.

THE COURT: I sustain the objection.

MR. JACKSON: Pass the witness.

MR. MARTIN: Judge, I need to get the  
black board, if I may.

THE COURT: Sure.

CROSS-EXAMINATION

BY MR. MARTIN:

Q Mr. Webb, how long have you been in jail?

A Six, seven months.

Q And you were in jail -- this time, was it  
robbery or burglary?

A Both. Burglary, robbery and forgery.

Q Who did you rob? A woman?

A Yes.

Q Robbed her of her purse?



1           A     Just came around. You know, they ask us for  
2     bleach to clean their showers. We give them the stuff.  
3     That's about it.

4           Q     How did you learn his name?

5           A     Well, I've known him before from jail. I've  
6     been there. I know who he is.

7           Q     This wasn't the first time you met him?

8           A     No, it wasn't.

9           Q     Now, presently, you are under a sentence of 18  
10    years to do in the penitentiary?

11          A     True.

12          Q     Is that aggravated or non-aggravated?

13          A     Aggravated.

14          Q     How much time do you understand that you will  
15    stay at minimum in the penitentiary?

16          A     Three years, nine months.

17          Q     And when were you sentenced to that?

18          A     Sometime either in late January or early  
19    February.

20          Q     Do you know why you are still here?

21          A     Basically, no, I don't. I think to testify on  
22    this, but I'm not sure.

23          Q     You should have gone to the penitentiary before  
24    now, but you you've been held over to testify here?

25          A     Not necessarily. There's another person in

# **APPENDIX 11**

ATTN: Jill - Dist. Clerk

OFFICE OF  
PATRICK C. BATCHELOR

CRIMINAL DISTRICT ATTORNEY  
NAVARRO COUNTY COURTHOUSE - P.O. BOX 621  
CORSIANA, TEXAS 75151-0521

TELEPHONE  
(903) 654-3045  
FAX  
(903) 872-6859

July 15, 1996

Records Department  
Texas Department of Criminal Justice  
P.O. Box 99  
Huntsville, Texas 77340-0099  
Board of Pardons and Paroles  
P.O. Box 13401  
Capitol Station  
Austin, Texas 78711

COPY

RE: WEBB, Johnny JDCJ-ID #626256

Gentlemen,

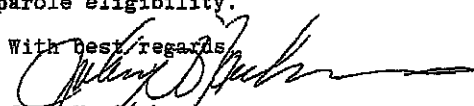
I have recently received a letter from Johnny Webb which indicates that your records show that he was convicted of the offense of Aggravated Robbery when, in fact, he was convicted of Robbery.

Examination of the records of the District Court disclosed that the original judgment reflected a conviction for Robbery, but also indicated the Penal Code section for Aggravated Robbery.

To clarify this matter, I examined our records, along with the records of the attorney who represented Mr. Webb. Based upon this, I requested that the Court enter a judgment nunc pro tunc in order to remove any doubt that Mr. Webb should stand convicted of the offense of Robbery, 2nd degree, which is an included offense of that with which he was originally charged.

I would appreciate your taking this information into consideration when computing any parole eligibility.

With best regards,

  
John H. Jackson  
First Assistant District Attorney

cc: Johnny Webb

# **APPENDIX 12**

OFFICE OF  
PATRICK C. BATCHELOR

CRIMINAL DISTRICT ATTORNEY  
NAVARRO COUNTY COURTHOUSE - P.O. BOX 521  
CORSIKANA, TEXAS 75151-0521

TELEPHONE  
(903) 654-3045  
FAX  
(903) 872-8858

October 21, 1992

S.O. Woods  
Classification Section  
Texas Dept. of Corrections  
P.O. Box 99  
Huntsville, TX 77340

RE: Johnny Webb, convicted of Robbery, Navarro County, Texas

Dear Mr. Woods,

The referenced individual has been convicted of robbery in Navarro County, Texas, and is scheduled for transport to TDC in the near future.

Mr. Webb was a pivotal witness in a capital murder prosecution in Navarro County, Texas. This case was styled State v. Willingham and resulted in assessment of the death penalty. Webb has placed himself at risk based upon his testimony in this case, and I fear that he may suffer reprisal if placed in the general population of TDC.

Webb has a medical condition that would enable him to be placed in a medical unit, which I believe would be lower profile and perhaps less stressful than a protective custody unit.

As you are aware, there is no guarantee of affirmance on any case, much less a capital case. Webb's testimony may be necessary at a later stage of proceedings and I would appreciate your attempting to place him in an environment that guarantees the smallest risk.

Very truly yours,

  
John H. Jackson  
First Asst. District Attorney

Willingham 225

# **APPENDIX 13**

OFFICE OF  
PATRICK C. BATCHELOR  
CRIMINAL DISTRICT ATTORNEY  
NAVARRO COUNTY COURTHOUSE - P.O. BOX 321  
CORPUS CHRISTI, TEXAS 78401-0321

TELEPHONE  
(903) 654-3045  
FAX  
(903) 872-6858

November 20, 1992

S.O. Woods  
Classification Section  
Texas Department of Corrections  
P.O. Box 99  
Huntsville, Texas 77340

BY TELECOPY: (409) 294-6227

RE: Johnny Webb, No. 626256, presently confined in Ferguson Unit

Dear Mr. Woods,

I would appreciate your consideration of a transfer of the referenced inmate to a unit such as Jester or Beto II. There are several reasons for this request. Primarily, this inmate was of pivotal importance in a capital murder prosecution, State v. Cameron Todd Willingham which resulted in a death penalty. Webb testified on behalf of the State, and, as a result has placed himself at risk and received numerous death threats from other inmates and family members of Willingham, who also has relatives in TDC.

Webb has some sort of psychological condition and requires medication. I feel that this may, taken with other circumstances, warrant that he be moved to a medical unit which would place him in more secure circumstances with less threat of reprisal.

I would appreciate your consideration of this request at your earliest convenience; and would also appreciate your reply relative to the feasibility of this request.

Very truly yours,

John H. Jackson  
First Assistant District Attorney  
Navarro County, Texas

PS: in the event of reversal, I would also like to be able to count on Webb's continued cooperation. JHJ

Willingham 226

# **APPENDIX 14**



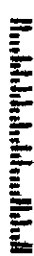
C. J. George  
Box # 645  
Consicome, TX 75151-0645



RECEIVED  
TO NEW  
APPOINTMENTS  
IN BACK ADMIN. Sincerely,  
Npc #6  
Johnny Wells # 626256  
Rt. # 1, Box # 16  
TX 75851

EastDrom Unit

ad



11/13/75

Dear Salmy,

I just received your long letter  
of the 19th - Many thanks for  
your interest about the New York  
recruitment program. I'll  
be sure to forward it to Gary. You can't

forget for that matter, that I am  
very curious about the "Secrets" that  
one might go about seeing in the field. I  
would like to see some of the  
things that are going on. I'll be  
back in about a month or so. I'll  
be sure to let you know when I  
get back. I'll be sure to let you  
know when I get back. I'll be sure  
to let you know when I get back.

Notice of absence  
sent to  
I suggest to  
until the  
and  
Hill

more reasonable - Tough is one thing but we  
can be reasonable at the same time.

I just tried to call Dr. Gellman as  
you requested - I got no answer. Let's  
keep trying & let you know anything I find  
out.

There is little more to report here.

Our mornings & afternoons in the high 50's -  
A few flares are trying to clear. A hard  
glaze over will really mess this. Well, we  
just got our first report on that.

Estee's  
Clearance

25% COTTON

C. B. Pearce Dr.  
Box # 645  
Considona, Tx. 75151-0645



NP #1  
Johnny Goff # 626256  
Rt. # 1 Box # 16  
Doveford, Tx. 75851

75851

Eastman ~~Dr~~

Dear Johnny:

I've arranged for your subscription to  
the Daily Sun, but they said it might take  
weeks or ten days for the paper to get started.  
With that in mind I am enclosing an article  
with special interest for you. Aren't you glad  
that the Supreme Court will not  
it would have ~~started~~ <sup>started</sup> again - not exactly  
a pleasure for you. Still, I suppose you'll take  
one more year ~~and~~ <sup>and</sup> ~~will~~ <sup>will</sup> have to walk  
softly!!

I had to laugh about my own hand  
 of Filler Mr. Geo. E. Raby. I grew up with  
 that program and will always remember Filler's  
 full of the place. You've heard the  
 Radio Theater. There are other very funny shows.  
 Have you heard "The Sickeners"? (Don Dunshee &  
 Francis Langford) Yours right, clean comedy  
 has faded away! I still enjoy it. Crazy  
 can be nasty, but he has several clean shows  
 that are a riot!! (about raising children)  
 Bill

2<sup>nd</sup> new house except beautiful  
Spring weather - flowers everywhere at the



sucker shoots on my oak trees need your magic  
touch again! You'd best hurry!

I'll be interested to hear how your  
Ray course suits you. As you say, if you  
tell me what makes you think I hope soon  
you can get to some of the other courses I  
mentioned. All knowledge is no matter how diverse,  
will be of help.

I'm glad to hear you're happy.  
Best to you

Alfred

0001

9257375917

C. B. Pearce Jr.  
Box # 645  
Consicoma, TX. 75151-0645



NPC #1

Johnny C Wells # 626256  
Rt. # 1, Box # 16  
Greeneville, TX. 75851

Eastham Unit



20 May 18

Dear Johnny:

Let's see ... your last letter was written  
on the 15<sup>th</sup>. Sorry to be delayed in answering.

Our yard looks wonderful with  
the ... 0.00 ... 0.00

man. It took the business a week to do  
the job - they were a little ...  
up - I had to keep on them about that.

~~Yesterday~~ I visited Perry  
at St. ...

Her first visit to ... It was quite an  
adventure for her. I was anxious for her  
to see very soon and ...

know him as a scrawny hen-egg. The  
change is astounding.

With elections over Cassin seems  
very calm. So far John Jackson a CD  
one of the only sure candidates for ...  
of course, others can announce only ...  
Let I hope there wait to more. I get



money what with sold votes & run off. I think  
Buck Douglas will suggest Jackson. He hasn't  
much use for Bill -

Conroy is in town for a few days  
between semesters. He currently is in  
probation at N. Texas State University. I  
am sure of that.

His average for reinstatement. At the moment  
he is in the hospital with a broken (bone) and  
and jaw grand!! Back in Arizona a  
few years ago Conroy won on a long shot &  
he was supposed to be a sure thing. He  
to doesn't have much to gamble with.

I will try & get off a money  
and I will be sure to use it. Don't  
use the money to bet on the horses -

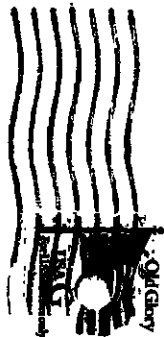
925 375913

NOTES-YES

E.S. Gears Dr.

Box # 645

Consignment, TX 75151-0645



Samuel Wells # 626256

Wyman Unit # 7-02-1

RT # 1, Box # 1 B1-44

Huntsville, TX 77349

Handwritten signature or mark.

8/11/95

Dear Johnny:

I've been thinking of you a great deal... hoping you are all right. I am most recent. ~~letter~~ gave me good cause to worry. I take your letter directly to.

of his in T.D.C. requesting that he look into your situation. Beyond that I know nothing except that a call to Huntsville confirms that you are still at Wynne. I hope there are ways you can bring out of that unit.

I'm wondering... did you receive mentioned it... I'm not sure, I still have the receipt.

anyway coming your way soon. Wynne is one of only two units of the 325th Airborne Division and then only if you can get away... no more grants for maintenance. The system is

Getting mighty tough!

I've had my second batch of grand  
kids with me this past week. They were the  
Arizona grandkids -- older than the Florida  
batch & easier to entertain. Anyway I think  
visits are over for this summer. In a way I'm  
just as glad to say so.

Most comfortable & agreeable -- especially in the  
super hot weather we have been having. Mornings  
are O.K., but afternoons are rough!

Well, I've been from you -- set  
my mind at ease. I'll be looking for a  
letter --

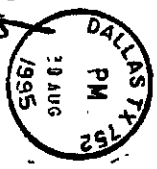
Take Care --

Esbeck

OS Pearce Jr.  
Box # 645  
Consicoma, Tx.

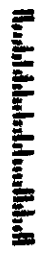
75151-0645

NR #26



Johnny Wells # 626256  
Rt # 64, Box # 16  
Academy, Tx. 75851

Eastern Vint





8/30/68


Dear Johnny:

I knew before your letter that you were doing  
Wynne. I don't know for certain  
D.D. summary Eastern Jackson. I don't  
D.D. a good jail & keep pushing it. I don't  
I don't know if you are in  
By the way, I don't know if you are in  
John may well be District Judge in which  
case his word will carry more weight. I can  
I don't know but I want

brush & shave. I will be shaving  
I usually in the station. I don't work for  
anybody.

I will stop by the newspaper office  
to get your subscription changed back to  
Eastern. Hopefully the last issue the O  
as soon as you find out anything  
more. Let me know. I'll be

Enough for now. Take care of your  
 by answer & expect your things.



12/27/95

Dear Johnny:

Well, Xmas is over... Carey has gone back to Denton, & we are getting back to normal. It was a nice Xmas... That is good food & a generous Santa Claus. There aren't many Xmas gifts these days... I saved for our

age group. There is one New Years Day which we will look in on - I don't drink anymore, & small talk is not "my cup of tea".

I watched <sup>0091</sup> the Carboys on Monday night. They were, but ~~did not~~ just wonderful doing it. Maybe if they get back some of their wiggles they will do

O.K. in the playoffs - I woke in the morning & got

what ~~stuff~~ <sup>that</sup> Bubby Ryan & his team. Bubby is ~~not~~ <sup>not</sup> a person to like like I'm glad to see him go -

My wife & daughter are flying to Singapore for a two week



12  
through Asia in Feb. - That was an Xmas  
present from me. Jim begged to stay  
home with all its creature comforts - I  
got my fill of traveling some years ago.

Jim glad Mr. McElroy came to  
see you. He is about the only one we  
have inside D.C. - I will stop & see

John Jackson ~~in~~ this morning. Maybe  
he has heard something from Parale.

It is possible that this letter will  
find you ~~the~~ <sup>in</sup> a bit delayed. I will  
have to keep me posted on your whereabouts.

Jim not sure where Ramsey is -

alone in the world -

OSB

~

C. J. Pearce Dr.  
Box # 645

Consicoma, Tx. 75151-0645

Relocation

LE 1752

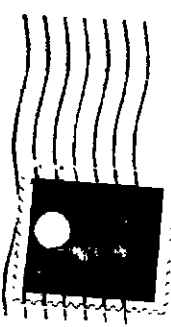
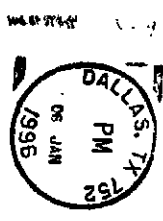
Mr. McElroy

Johnny W. Wolk # 626256

Rt. # 1, Box # 16  
Sawdady, Tx. 75851

Eastman Unit ADM-SEC

Non-Confidential



PC  
9

Dear Johnny:

I sent off \$100 to you recently.  
The same day I received your letter. I hope  
that will make things some easier for you.

You are about Singapore.  
I will send you one, I'm supposed to send  
you about Singapore. It's probably the most

important commercial city in Asia today.  
It's Hong Kong is a city in China, a  
big city, but it's not as big as Singapore.  
I have been there twice. It is a beautiful  
place! Its airline is the only one with sleeping  
accommodations. It's a very long flight.

It is a very long flight - 15 hrs!


Jackson has heard from Paula

is working for his old employer. There can  
be no guarantee, but people are working in  
again. I hope you are  
cared, the feeling is that you are not  
would not be around for long. The  
have not been abandoned human beings.  
Name Change -

since we want to keep the same  
James Wicks might I ask you. As for  
Arkansas as a new location, I may like  
it. I like to Texas. That is, you might  
easily be spotted by someone who knows you.  
Further away would be better. Montana  
Alaska. Or maybe Arizona or Colorado. The  
decision will be yours to make. There is time  
to think about all this.

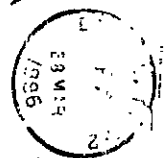
It's ~~Collected~~ <sup>Collected</sup> ~~you~~ <sup>you</sup> in the  
a house protected! You all the ~~collected~~ <sup>collected</sup> my  
I. ~~Collected~~ <sup>Collected</sup> ~~you~~ <sup>you</sup> in the

25% COTTON  
Carbays glow tomorrow  
my fingers crossed  
Don't give up the ship —

Best,  


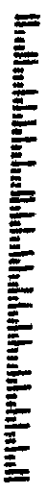
C.S. Boone Jr  
Box # 645  
Consicoma, TX 75151-0645

6-11-96



Johnny Wells # 626256  
Rt. # 4, 00 Box # 1100  
Rosharon, TX. 77583

Ramsey I - ADM-SEC  
77583/9999





Dear Johnny:

3/21/76

Don't feel as though I've abandoned  
I have taken your case to John  
Jackson, & he has put up a special file on  
your problems. He has talked with Parks  
& now is in touch with a couple of State  
attorneys. I know I can't do it all, but

will produce some results. There are of course  
no guarantees. I just want you to know that  
people are trying to help.

I am impressed with your legal  
efforts. It's a complicated business. Who is  
helping you? I know I couldn't handle that  
on my own. Maybe -- just maybe --  
I could in exchange for  
dropping your suits --

You ask if Jackson is now District  
Judge -- No -- not yet -- the recent elections  
were primaries where each party selects their  
candidates for various offices. In November  
these candidates run against each other --  
Jackson (Dem.) v.s. Bell (Rep.) -- the real  
campaigning hasn't yet begun --

You also ask about Gary Potter. His  
parent was denied with a year's "set off" —  
He is disappointed & will try to get transferred  
to a unit where he can continue his education.

You also ask about Carey. He will graduate  
from his basic course after summer school  
& then finish up in about three months. Then  
comes the hard part — finding a job. It is not  
as easy as it may sound —

Not much new here. Spring is  
mighty slow in coming. Trees are showing  
some green & ~~some~~ 0001 ornamental trees are in  
bloom. — Still, it's ~~very~~ cold — But you  
might even some hail & our first formal  
warning of the season. A little rain here  
helped — Everything is coming along.

Well then — Stay cool & do  
your best. I know times are hard, but  
hopefully things will brighten your way soon.

Best of luck  
Clearcrest  
for you —

25% COTTON

5/13/46

Dear Johnny:

Thanks for your most recent letter. You lead a very complicated life.

You will be very glad to know that John Jackson is working very

hard in your behalf & hopes for good results. Do what you feel you must but don't let it be too much at this time.

Concerning the right of you need... I will do my best to help.

Mr. [Name] received your letter. I am sure in the morning mail, great thought & much appreciated. The great part of the mail to write is "written" or "written" not "write" or "writing".



C. J. Rocco Jr.  
Box # 645  
Consicoma, TX 75151-0645



FBI

Johnny E. Wells # 626256  
Rt # 4, Box # 1100  
Rosharon TX, 75083

Ramsay I. ADM, - SEC 7502/0000  
|||||

5/13/10

Dear Johnny:

Thanks for your most recent letter. You lead a very complicated life —

You will be very glad to know that John Jackson is working very

hard in your behalf & hopes for good results. Do what you feel you must do but don't let it get to the point where you are

Concerning the 4000 you need — I will do my best to help —

Please receive your letter. I received it in the morning and was thoughtful & much appreciated. The part of the mail to write in "written" was written to not write in "written" —

6/5/46

Dear Johnny:

You are not forgotten — There are heavy  
days — but ones too — It did rain a very little  
this morning, but not enough to solve the  
drought problems. Tanks, many are dried up  
in some places.

Wheat fields that were meant for grain are  
now being grazed.

I'm wondering if you ever received  
the office supplies I sent you. I was thinking  
the other day that I should have sent you  
all about sending stuff to prison. I guess  
you had a letter & left it all to me. I  
hope you got everything with no hassle —

Tomorrow I will try & see John  
Jackson again. I will tell him to all about  
how we try to work some angles with the D.A.  
the Sheriff — the District, Bureau —  
a lot of people — I hope you don't  
give up. **Clearer days**

For 25% COTTON

I have a...  
bright in a...  
sight. - The was...  
not enough to go...  
Before long I will be...  
ground... - fear of them...

I dream a...  
bright...  
I'm sure every...  
all goes...  
for you. Take care of...  
fight &...  
Better days ahead  
Believe

Believe

C.S. Pearce Dr.  
Box # 645

Corisicoma, TX 75151-0645

62217



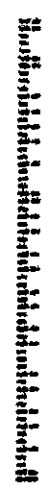
10/11/96

JP  
Johnny Wall # 626256  
Box # 1100

Rushmore, TX.

77583

Ramsay I Unit ADD SEC





7/10/96

Dear Johnny:

Grandchildren have come a gone, and life is back to normal .... Normal these days is very hot!

By all means, Johnny, send on what it is ~~that~~ needs copping --- just so long as it isn't too terribly much.

I know it has been a while since I last wrote, but you are not forgotten. John Jackson is still working to get you release. To be sure it is a <sup>0001</sup> ~~screwed up~~ situation, with no quick fix, but people are trying. It would help ~~if~~ <sup>if</sup> there were some believable guarantee that you wouldn't mess up again --- I mean the drug thing --- those willing to help don't want to lock ~~bed~~ <sup>you</sup> if on release you go down again. One more time, there would be nothing anyone could do.

Do you ever hear from your family. I used to see your dad in H.E.B. occasionally, but not recently. The old home place looks pretty messed up. I'm wondering if they have moved —

Your battle is not the only one I am  
waging. Getting Gary transferred is proving  
mighty tough. It seems I spend half my  
life writing letters. So far no luck, but I  
keep trying — It's a lot like wading through  
an endless swamp!

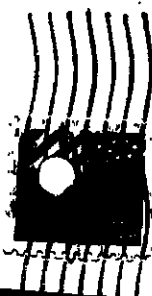
The grandchildren were fun, but Jim  
a bit old for endless chatter & occasional  
jazzing. It's good to see them both coming  
and going. And now Jim a Great grandfather!  
Wow! — That is old!

Keep toughing, friend —  
Best to you —

CR



C. J. Rance Jr.  
Box # 645  
Consicoma, Tx. 75151-0645



62-17

Johnny Wells # 626256  
Rt # 4, Box # 1100

Roskelen, Tx. 77583

77583/9993





Dear Johnny:

9/3/96

Thanks for your letter of the 23<sup>rd</sup> -  
Sorry to be so delayed in answering. It  
seems like things come along all at once -

Let's see about your questions: Yes,  
the lakes are still very low despite a 6" rain  
a couple of days ago. There's not much difference  
in the Big Lake, but stock tanks caught  
a fair amount of water - For a while, ranchers  
were using city water where available!

And yes, Casey is still in college.  
He has completed his undergraduate work in  
Law Enforcement & in October will have 6 mos.  
in the Academy - After that, if no great job  
comes along, he wants to go for his Bachelor's  
Degree at N. Tex - ~~that~~ that would qualify  
him for a really good job (in theory)

I saw Gary last weekend -  
He is fine, but still trying to get on with  
his education. His '96 parole review comes up  
next month, so I guess that's a possibility -  
I don't know what more I can do or say  
to help in that matter, but I will keep  
trying -

2

I liked your poems -- especially the content. You can tell that the feelings expressed are genuine. When you write poetry -- unless "blank" or "free" verse -- you should watch your meter -- It always jars the reader when meter is broken --

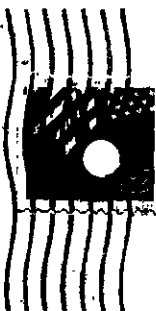
This Saturday the college is opening the Civil War collection I have donated. I expect the paper will carry a big article about it, so be on the look out.

No special news to speak of -- some old -- some ~~old~~ -- I'll try to see John Jackson today or tomorrow --

Best to you.

W. B. D.

C.S. George Jr  
Box # 645  
Consicoma, Tx. 75151-0645  
E2-17



Johnny Wells # 626256  
Rt. # 4, Box # 1100  
Rosharon, Tx. 77583

Ramsay I ADM-SEG  
77583/77583  
Rosharon, Tx. 77583

Dear Johnny:

9/13/96

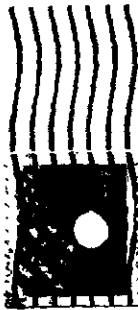
Concerning your most recent letter, several matters need discussing:

As concerns going back into general population, I advise against it. I'm convinced you would put yourself in immediate danger & in fact would not get you paroled any sooner. I suggest it is general policy to get inmates out of Protective Custody as soon as possible.

And now, about going public with your complaints; As of now, I advise against it — there is no guarantee you would get the publicity you want, and then again your record is not one to run on — Assuming the media would listen to you, it would affect not only you but would reopen a rehash the whole Withingham case. That would not gain you any friends & would in fact keep John from doing anything for you.

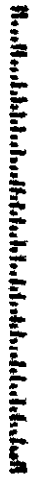
I have shown your letter to John, and he says he will write you directly about your prospects for parole. Read his letter

CSGence Dr.  
Box # 645  
Coniscoma, TX. 75151-0645



62417  
Johnny Wells #0  
Rt #4, Box #1100  
Rosharon, TX. 77583

Romsey II Unit



Dear Johnny:

Inclosed is the letter you asked  
to have returned to you. I showed it to John,  
and he wants to contact the Houston D.A.  
concerning any special information she may  
have. John says he has written you. I would  
point out to you that there are some things that  
can & some that cannot be discussed in a letter.  
You will have to go along on trust, & I can  
assure you that people are working in your  
behalf. That's all I can say at this time.

Stay cool & try to stay out of  
Harris' way. I still think General Regu-  
lation is a good place for you.

Best,

Bob

}

# **APPENDIX 15**

2014年12月25日  
10:10 10:10 10:10  
2014年12月25日  
10:10 10:10 10:10

Chief Eddie McHlyea  
P.O. Box 99  
Huntsville, Texas 77342

DEAR EDDIE,

I would very much appreciate your assessment of the situation, particularly with regard to whether he is in any real danger.

Very truly yours,

John E. Jackson  
First Assistant District Attorney



# **APPENDIX 16**

24490

IN THE 13TH DISTRICT COURT OF  
NAVARRO COUNTY, TEXAS, CITY  
OF CORSICANA, TEXAS 75110

TO WHOM IT MAY CONCERN:

STATE DISTRICT JUDGE, HONORABLE KENNETH "BUCK" DOUGLAS  
COUNTY DISTRICT ATTORNEY, HONORABLE JOHN JACKSON

Re: WITNESS REQUEST FOR A PROTECTIVE ORDER BY JOHNNY E. WEBB  
HONORABLE OFFICIALS,

My name is Johnny E. Webb, prison identification number 626256. The Texas Department of Criminal Justice-Institutional Division (TDCJ-ID) Unit where I am incarcerated is the Ramsey I unit in Brazoria County, Texas. Prior to January 10, 1996, however, I had been incarcerated in the Eastham Unit of the TDCJ-ID in Houston County, Texas.

First, I will recount the relevant history related to this matter. In 1992, I testified in favor of the state against Todd Willingham, who was convicted and sentenced to death for Capital Murder. Since I had already been convicted in an unrelated case, subsequent to that conviction I was transferred to TDCJ-ID.

Stating facts related to the period when I was incarcerated in the Eastham Unit of the TDCJ-ID, I was threatened with harm by TDCJ-ID officer Bruce Cheney. This encounter took place on about November 14, 1995. Officer Cheney threatened me with harm, if I did not recant testimony which I gave in this court in the Willingham

trial. Officer Cheney told me that I had to write to Mr. Willingham, where I put him [on death row] and straighten things out with him, but that, if I didn't do that, the threats would continue. He further stated that, if I told on him, nothing would happen to him and I would only be transferred to the Ramsey I Unit where he had friends who would come talk to me?

Behind this incident, I filed a lawsuit alleging the above-allegations against officer Cheney. See Case number # 9:95cv451 (Webb v. Cheney, Fed. Dist. Court--Lufkin Div.). Shortly after the filing of that lawsuit, I was transferred to the Ramsey I Unit, as officer Cheney had told me.

Since my arrival at Ramsey I Unit, I have been the target of retaliation from, at least, two officers. These officers have subjected me to false disciplinary cases. As a direct result, I have reached the lowest class status, lost good time, lost personal property, have been kept on loss of privileges, and have found foreign objects in my food when those officers have passed out trays. As officer Cheney told me, all these things would continue.

It is my personal understanding that A.P. Merillat of the Special Prosecution Unit Huntsville, Texas, and Cindy Maria Garner, District attorney in Houston County, Texas are well aware of other complaints from other inmates lodged against officer Cheney. Also, I have previously informed you, Mr. John Jackson, and the Special prosecution Unit about

my encounter with officer Cheney. However, nothing has been done to help me after I have placed my life in jeopardy for the State of Texas.

There are several witnesses that would corroborate my allegations against officer Cheney and the Ramsey I Unit incidents. The inmate-witnesses from the Ramsey I Unit are: (1) Neil French, # 626249; (2) Victor Estrada, # 458432; (3) Nolberto Ortega, # 512899. The inmate-witnesses from the Eastham Unit are (1) Donnie Paul Booth, # 419819; (2) Raul Meza, # 332350; (3) Demont Jackson, # ; and (4) Miguel Rodriguez. All these witnesses have made known to me that they are willing to testify to the allegations made herein.

It is my most urgent and respectful request that this court grant a protective order placing me under this court's protection, either by placing me in custody in the Navarro County Detention Facility, or turn me over to Federal authorities so that they may take custody. If possible, any witnesses herein named, that would testify in my behalf, I would also request this court grant them protection because I seriously believe that, if left where they are, they would be the subjects of the same retaliation that I am going through.

The court possesses the jurisdiction to grant a protective order for my protection because I freely gave testimony in the Capital Murder trial of Mr. Willingham, without fear of retaliation, harassment, or threats from others. It is like entering into a contractual agreement.

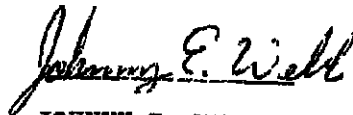
See, e.g., U.S. Life Title Co. of Dallas v. Andreen, 644 S.W.2d 185, 191 (Tex.App.--San Antonio 1982, writ ref'd n.r.e.). When interpreting the meaning of a contract, a court must look to the objective, not the subjective, intent which controls. Swaminathan v. Swiss Air Transport Co., Ltd., 962 F.2d 387, 389 (5th cir. 1992). The question of whether a contract is ambiguous is a question of law for the court to resolve. Shelton v. Exxon Corp., 921 F.2d 595, 602 (5th Cir. 1991). Here the state offered me certain benefits in exchange for my testimony, which resulted in sending a man to death row. This resulted in a murder contract being placed on my head. Because I kept my end of the promise, the state is bound to uphold theirs' until my release from incarceration. See, e.g., United Concrete Pipe Corp., v. Spin-Line Co., 430 S.W.2d 360, 364 (Tex.1968, reh.den.) (holding that "performance of that act which the offeree was requested to promise to perform may constitute a valid acceptance"). Perhaps it is a duty owed to a witness testifying in behalf of the state under the Texas Constitution. In any event, I must inform this court and county officials that I have become the subject of retaliation due to the testimony I gave in open court in the 13th District court of the State of Texas. Surely there is something this court can do to protect me from this oppressive conduct. Texas law prohibits: 1) Threats, 31.03 (d)(5)(c)(Penal Code); 2) Conspiracy to Commit Felony, 15.02 (Penal Code); 3) Injury to Prisoner by Guard, 39.021 (Penal

Code); 4) Official Misconduct, 39.01 (Penal Code); 5) Retaliation, 36.06, (Penal Code); and 6) Tampering with witness.

I fervently pray that this court or county officials of Navarro County, Texas assist me in securing a protective order to have me removed from the TDCJ-ID, where I been continuously retaliated upon, and placed somewhere in Navarro county, Texas Detention facility or Federal custody. It is so moved and prayed.

Respectfully yours,

5-17-96



JOHNNY E. WEBB  
TDCJ-ID # 626256  
RAMSEY I UNIT  
RT. 4, BOX 1100  
ROSHARON, TX.  
77583

ORGNL: 13TH DIST COURT  
CC: DIST. ATTY.  
JEWEBB

# **APPENDIX 17**

OFFICE OF  
PATRICK C. BATCHELOR  
CRIMINAL DISTRICT ATTORNEY  
NAVARRO COUNTY COURTHOUSE - P.O. BOX 521  
CORSIKANA, TEXAS 75151-0521

TELEPHONE  
(903) 654-3045  
FAX  
(903) 872-8858

May 8, 1996

Hon. Victor Rodriguez  
Texas Dept. of Criminal Justice  
Price Daniel Building  
209 West 14th Street  
Suite 500  
Austin, Texas 78701

RE: Johnny Webb, TDC No. 62656

Dear Mr. Rodriguez:

I appreciate your recent telephone call and your interest in the Johnny Webb case. My interest in Webb is summarized as follows.

Johnny Webb, while incarcerated in the Navarro County Jail came in contact with an inmate indicted for capital murder in the deaths of his three infant daughters. In the course of this contact, the murderer, Cameron Todd Willingham, admitted to Webb that he killed his daughters by setting fire to their residence, which admission was consistent with the physical evidence. Webb ultimately testified in the capital murder trial and the jury returned a verdict which required the Court to impose the death penalty. The capital murder case has been affirmed by the Texas Court of Criminal Appeals and certiorari denied by the U.S. Supreme Court. The writ process has begun and I expect that Willingham will apply for writs of habeas corpus to both State and Federal Courts.

During Webb's incarceration on a robbery case from Navarro County, Texas, he has received numerous threats from other inmates and even correctional personnel apparently acting in concert with Willingham. This has been the subject of an inquiry by Capt. McElyea of Internal Affairs. Even though Webb has been incarcerated in various units, and assigned to "ad seg" units, the threats and intimidation have apparently continued. In my opinion, the only possible solution to this problem is the release of Webb from TDC. I understand that his next parole hearing is scheduled for September, 1996, however, I respectfully request that you consider or recommend consideration of an out-of-sequence parole hearing. The factors that I believe support such consideration are as follows:

1. Webb volunteered to assist in the trial of a capital murder case which resulted in the rendition of a death verdict in the case of a dangerous criminal who murdered his three daughters;

Willingham 80



Page Two  
May 8, 1996

2. Webb volunteered information and testified in the trial of the murder case without any agreement from the State respecting diminution of the recommendation in his own case;

3. Webb was fully aware of the consequences of his conduct in offering testimony, and understood that he would be at risk when he was transferred to TDC;

4. Although Johnny Webb was convicted of robbery, generally regarded as a violent crime against persons, the robbery was committed against a family member while Webb was under the influence of narcotics. The actual conduct, while posing a threat, did not in my opinion, pose the kind of danger normally associated with robbery cases.

5. Continued threats directed against Webb will jeopardize the State's ability to oppose continued applications for habeas corpus by Willingham, and any threat to the public by early release of Webb is far outweighed by the possibility that Willingham might be successful in his writ practice.

6. Threats against Webb have been documented, and have continued regardless of protective measures.

I am aware that Webb has filed a pro se civil suit in the Lufkin Division of the Eastern District, however, in my opinion, the suit is the result of fear and frustration born of harassment and intimidation. It is my belief that such matters will be promptly discontinued if parole is granted, and I will be happy to exercise any influence I might have with Webb to assure this result.

This letter should not be interpreted as representing that Johnny Webb is a model citizen, or that Webb is more than an average candidate for rehabilitation. I am aware of his history of narcotics abuse and property crimes, including robbery. On balance, I believe (1) that continued incarceration for a period of months will not have any significant effect on his rehabilitation or recidivism; (2) continued incarceration may well erode the State's ability to protect the public from a psychopathic multiple murderer; and (3) Webb's cooperation in the murder prosecution without expectation of leniency should be accorded some consideration.

Please contact me if you have questions or comments regarding this matter.

Very truly yours,

  
John H. Jackson  
Assistant District Attorney

JHJ:lls

Willingham 81

# **APPENDIX 18**



# STATE COUNSEL FOR OFFENDERS

A Division of  
TEXAS DEPARTMENT OF CRIMINAL JUSTICE



**LEGAL SERVICES**  
**ADMINISTRATIVE SERVICES**  
P.O. Box 4005  
Huntsville, TX 77342-4005

**IMMIGRATION SERVICES**  
P.O. Box 4007  
Huntsville, TX 77342-4007

**TRIAL SERVICES**  
**INVESTIGATIVE SERVICES**  
P.O. Box 4006  
Huntsville, TX 77342-4006

November 19, 1996

Mr. John Jackson, Assistant Criminal District Attorney  
Navarro County Courthouse  
P.O. Box 521  
Corsicana, Texas 75151-0521

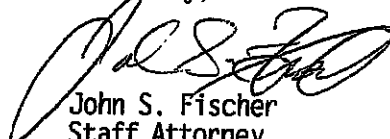
Dear Mr. Jackson:

Pursuant to your request this morning, I am enclosing a copy of what we send TDCJ offenders when they ask about obtaining a time cut. I hope this information will be of assistance to you.

Ms. Stone and I were glad to meet with you and Mr. Marshal at Eastham, and I look forward to hearing that Mr. McJunkins has been finally bench-warranted back to the county, as is legally required.

If I can be of any further assistance, do not hesitate to contact me.

Sincerely,

  
John S. Fischer  
Staff Attorney  
Legal Services

JSF/gmm

cc: File

James H. McJunkins  
TDCJ# 538862



# STATE COUNSEL FOR OFFENDERS

A Division of  
TEXAS DEPARTMENT OF CRIMINAL JUSTICE



**LEGAL SERVICES  
ADMINISTRATIVE SERVICES**  
P.O. Box 4005  
Huntsville, TX 77342-4005

**IMMIGRATION SERVICES**  
P.O. Box 4007  
Huntsville, TX 77342-4007

**TRIAL SERVICES  
INVESTIGATIVE SERVICES**  
P.O. Box 4006  
Huntsville, TX 77342-4006

November 19, 1996

\*

Dear \*:

Enclosed herewith please find a time-cut information sheet.

You should draft three letters, one to the Sheriff, one to the Judge, and one to the District Attorney of the county in which you were convicted. Be sure to list in each of these letters every reason why you feel that you are entitled to a time-cut. A sample letter is contained in the time-cut information sheet which I am forwarding to you. Below are the addresses you will require:

Cause No.:

\*

Judge:

Hon. \*  
Judge, \* District Court  
\* County Courthouse  
\*

District Attorney:

\*, District Attorney  
(Same address as above)

Sheriff:

Sheriff \*  
(Same address as above)

Sincerely,

\*

Staff Attorney

\*

cc: File

Enclosures

Willingham 132

A REQUEST FOR A TIME-CUT

Honorable \_\_\_\_\_, Judge  
\_\_\_\_\_ District Court  
\_\_\_\_\_ County Courthouse  
\_\_\_\_\_, Texas

RE: Cause No. \_\_\_\_\_  
State v. \_\_\_\_\_ (your name)  
TDCJ-ID # \_\_\_\_\_  
Request for Time-Cut

Dear Sir/Madam:

On \_\_\_\_\_, 19\_\_\_\_, I was convicted in your court for the offense of \_\_\_\_\_, after a plea of \_\_\_\_\_, and sentenced to a \_\_\_\_\_ year term in the Texas Department of Criminal Justice-Institutional Division.

According to the Rules and Regulations of the Board of Pardons and Paroles, if a majority of the trial officials (i.e. the presiding judge, district attorney and sheriff) give a favorable recommendation, without solicitation by the Board, an inmate's sentence may be commuted. This being the case, I am requesting that such a favorable recommendation be made to the Board in light of the following circumstances of my conviction.

[List every reason why you feel that the sentence was excessive; (guilty pleas, illnesses or addictions at the time of the crime, jury prejudice, lack of sufficient evidence, prior clean record, mitigating factors at the time of crime, self defense, etc...)]

Because of these reasons, I am hoping that the necessary trial officials, en banc, will discuss the possibility of a favorable recommendation in my case.

Any consideration given in this matter will be sincerely appreciated.

Very truly yours,

\_\_\_\_\_  
SIGNATURE

NOTE: Send copies of this letter to the district attorney and sheriff.

from conviction.

Commutation of sentence involves the changing or modification of the penalty assessed in the court and if granted results in a penalty lower than that set by the court. Therefore, such action must be based upon facts directly related to the case and not upon outside or unrelated matters.

The Board will not consider any of the following reasons as a sufficient basis for commutation of sentence:

- A. Hardship to inmate or family.
- B. Position or standing of inmate or family in the community.
- C. Comparison of penalties.
- D. Good behavior or adjustment in prison.
- E. Rehabilitative qualities of the inmate.
- F. Any other reason not directly connected to the facts upon which the conviction rests.

A written recommendation on the official letterhead of the officer holder with his original signature (not stamped) must come directly to the Board from a majority of the trial officials without solicitation on the Board's part. Trial officials are the present Judge of the court of conviction, the present prosecuting attorney and the sheriff of the county of conviction.

If the subject, parolee or inmate, has the recommendation of a majority (2) of the trial officials and no written communication is received from the third trial officials, then in that event the Board is required by statute to give that remaining officer at least 10 days notice that such clemency is being considered by the Board or by the Governor.

In cases tried prior to the tenure of the present office holders, the recommendation of persons holding such offices at the time of the trial of the case may be used to bolster and support the recommendation of the present trial officials, if in compliance with the following rules set out.

#### REQUIREMENTS

The requirements of a written recommendation of the trial officials for commutation of sentence must include:

1. Statement that the penalty now appears to be excessive.
2. A recommendation of a definite term now considered by the officials as just and proper.
3. A statement of the reasons for the recommendation bases upon facts directly related to the facts of the case and in existence but not available to the court or jury at the time of the trial, or a statutory change in penalty for the crime which would appear to make the original penalty excessive.

It is important that the reasons given be based upon facts in existence at the time of the trial, connected with the case, but not available to the court or jury at the time of the trial, and such facts should be plainly set out.

Compliance with the above rules is sufficient for the Board's consideration of the application for Commutation of Sentence, but compliance does not necessarily mean that favorable action will result.

If the convicted person is not confined in the Texas Department of Criminal Justice-Institutional Division, a certified copy of the judgment and sentence must be furnished.

These requirements have no connection with parole. After an inmate becomes eligible for parole consideration under the parole laws, the Board will take the initiative, and if favorable action is taken, statutory notices will be sent to the trial officials.

No forms are furnished for application for commutation of sentence other than this instruction sheet.

# **APPENDIX 19**

OFFICE OF  
**PATRICK C. BATCHELOR**  
CRIMINAL DISTRICT ATTORNEY  
NAVARRO COUNTY COURTHOUSE - P.O. BOX 521  
CORSICANA, TEXAS 75151-0521

TELEPHONE  
(903) 654-8045  
FAX  
(903) 872-8858

December 20, 1996

Texas Department of Criminal Justice  
Parole Division  
8610 Shoal Creek Blvd.  
Austin, Texas 78758

RE: Johnny E. Webb, TDC# 62656

Gentlemen,

Find herewith letters from the Criminal District Attorney, The District Judge, and the Sheriff of Navarro County, Texas, who are and were the trial officials with respect to the case by which Johnny E. Webb is presently confined in the institutional division.

All letters reflect that based upon present circumstances, they believe that the sentence assessed Webb was excessive and that commutation or "time cut" is appropriate.

I would appreciate your forwarding these letters to the proper official for expeditious consideration. Please contact me if you have any questions with regard to this request. Your consideration is very much appreciated.

Very truly yours,

John H. Jackson  
Assistant District Attorney



# NAVARRO COUNTY

LESLIE COTTEN  
SHERIFF



DON BARRON  
CHIEF DEPUTY

## SHERIFF'S DEPARTMENT

CRIMINAL JUSTICE CENTER  
312 WEST 2nd AVENUE  
CORSICANA, TEXAS 75110  
(903) 654-3002

Texas Department of Criminal Justice  
Parole Division  
8610 Shoal Creek Blvd.  
Austin, Texas 78758

RE: Johnny E. Webb, TDC No. 62656; Navarro County cause No. 24490, 13th  
District Court

Gentlemen,

This letter concerns Johnny E. Webb, presently incarcerated in the Institutional Division for 15 years based on a robbery conviction in this County.

I have conferred with law enforcement personnel and am in receipt of copies of letters from the Criminal District Attorney and District Judge of this County concerning their request for what is generally known as a "time cut" for Mr. Webb. Based upon my present knowledge of Mr. Webb's circumstances, it appears to me that there were factors unknown to trial officials at the time of disposition of the referenced case which now warrant commutation and/or reduction in time served. These factors are set out in correspondence from the District Attorney and the District Judge.

Based upon all these matters, it now appears to me that the sentence assessed was excessive and that a proper sentence or term of confinement in the referenced case would be a term of five years.

Respectfully submitted,

Leslie Cotten, Sheriff  
Navarro County, Texas

OFFICE OF  
**PATRICK C. BATCHELOR**

CRIMINAL DISTRICT ATTORNEY  
NAVARRO COUNTY COURTHOUSE - P.O. BOX 521  
CORSIANA, TEXAS 75151-0521

TELEPHONE  
(803) 654-3045

FAX  
(803) 872-6858

Texas Department of Criminal Justice  
Parole Division  
8610 Shoal Creek Boulevard  
Austin, Texas 78758

RE: Johnny E. Webb, TDC No. 62656; cause No. 24490

Gentlemen,

This letter concerns the referenced inmate now incarcerated in the Institutional Division for the offense of Robbery for which he was convicted in the 13th District Court of Navarro County, Texas, on 3/6/92, and sentenced to 15 years, such sentence to begin 1/9/92.

Based upon information which has been forwarded to me, I now believe that the penalty assessed appears to be excessive. The reason for this belief is based upon a recent interview with the victim of the offense, Shirley McAdams, who has advised that she believes the punishment assessed was inappropriate; that she believes that the punishment inflicted in this case is excessive; and that the nature of the conduct which led to Webb's conviction simply does not warrant further confinement.

Mr. Webb's case was disposed of by a plea of guilty, and the personal observations of the victim, the relationship of the defendant and the victim, and the character of the threat actually perceived by the victim were not known to trial officials. Consideration of these factors leads me to believe that commutation is proper in this case.

After consideration of these issues, I believe that a just and proper sentence and/or term of confinement in this case would be a period of five years.

Very truly yours,

  
Patrick C. Batchelor

# NAVARRO COUNTY



**Genneth A. "Buck" Douglas**

JUDGE, 13TH JUDICIAL DISTRICT COURT  
NAVARRO COUNTY COURTHOUSE  
P.O. BOX 333

CORSICANA, TEXAS 75151-0333

December 19, 1996

Texas Department of Criminal Justice  
Parole Division  
8610 Shoal Creek Boulevard  
Austin, Texas 78756

Re: Johnny E. Webb, TDC No. 626<sup>2</sup>56; Cause No. 24490,  
13th Judicial Court

Gentlemen,

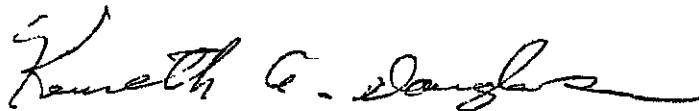
The referenced inmate is presently incarcerated in the Institutional Division, serving a 15 year sentence from this Court in the robbery case referenced above. Such sentence was to begin 1/9/92.

I am in receipt of an affidavit signed by Shirley McAdams, the alleged victim of said offense. The substance of such affidavit is that, based on the character of the actual conduct committed by Webb, she believes that service of additional time in TDC would be "clearly excessive."

I have had an opportunity to confer with the prosecutor who handled the case and review the circumstances which lead me to believe that service of more than a five year sentence based on the relevant facts of this case would be excessive.

It further appears that additional circumstances exist, which have apparently been verified by TDC investigators, that suggest that Webb is in danger from incarcerated gang members in connection with a capital murder case in which he testified on behalf of the State of Texas.

I concur with the Criminal District Attorney that a just and proper term of confinement in this case would be a period of five years.

A handwritten signature in cursive script, reading "Kenneth A. Douglas". The signature is written in dark ink and is positioned above the printed name.

Kenneth A. Douglas, Judge  
13th Judicial District

KAD:df

AFFIDAVIT OF SHIRLEY McADAMS

THE STATE OF TEXAS  
COUNTY OF NAVARRO

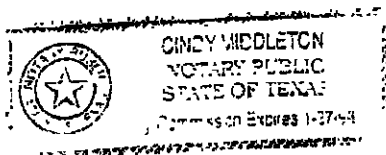
BEFORE ME, the undersigned authority, on this date personally appeared SHIRLEY McADAMS, who, after being by me duly sworn did upon oath depose and state as follows:

"My name is Shirley McAdams. I am 56 years of age and reside in Corsicana, Navarro County, Texas. In early 1992 I was a witness and complainant in a criminal case in which Johnny E. Webb was accused of the offense of robbery. I was the sole complainant and victim of this offense which occurred at the residence of Juanita Isbell, a relative of Mr. Webb. I am aware that Mr. Webb was convicted of robbery in this case and sentenced to 15 years in prison. I am also aware that he has presently served more than four years incarceration and I believe that service of any more time in connection with this offense would be clearly excessive. I have considered the circumstances of the offense and although I was frightened at the time the offense occurred, it is apparent to me that Mr. Webb was under the influence of narcotics and probably would not have committed this offense otherwise. By this statement, I request that Court and prison authorities take whatever steps are necessary to cause Mr. Webb to be released as soon as possible. This affidavit was executed voluntarily and I have no reservations about anything I have said herein."

Signed this 4th day of November, 1996.

Shirley McAdams  
Shirley McAdams, Affiant

SUBSCRIBED AND SWORN TO BEFORE ME on the date written above by Shirley McAdams.



Cindy Middleton  
Notary Public, State of Texas

# **APPENDIX 20**

# ● NAVARRO COUNTY ●



**JOHN H. JACKSON**

JUDGE, 13TH JUDICIAL DISTRICT COURT  
NAVARRO COUNTY COURTHOUSE  
P.O. BOX 393  
CORSICANA, TEXAS 75151-0393

DIXIE FINCHER  
COURT COORDINATOR  
(903) 654-3020

LESLIE KIRK  
OFFICIAL REPORTER  
(903) 654-3022

June 13, 1997

David Doughty, Warden  
Ramsey I Unit  
Texas Dept. of Criminal Justice  
Rosharon, Texas 77583

RE: Johnny E. Webb, #626256

Dear Warden Doughty,

As you may be aware, the subject inmate was transported to the Navarro County Justice Center in Corsicana, Texas in January of this year. I have been advised that his personal effects, including cash, photographs of his family, and legal documents have not been forwarded to him.

I would appreciate your looking into this matter and letting me or Mr. Webb know the status of his belongings. He is apparently about to be released, based upon executive clemency in connection with a capital murder case and is fearful of these items being lost in the shuffle.

Apparently, these items have very little intrinsic value, however, it would be helpful if they could be forwarded to the Navarro County Justice Center, 301 W. 3rd Ave., Corsicana, Texas 75110.

With Best regards,

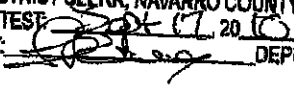
  
John H. Jackson

**CERTIFIED A TRUE COPY**

**MARILYN GREER**

DISTRICT CLERK, NAVARRO COUNTY, TX

ATTEST

BY:  20 10  
DEPUTY

97 JUL -2 AM 10:40  
FBI  
DISTRICT CLERK  
NAVARRO COUNTY, TEXAS  
DEPUTY

# **APPENDIX 21**



JOHN H. JACKSON  
ATTORNEY AT LAW  
P.O. BOX 1  
POWELL, TEXAS 75153

CORSICANA, TEXAS  
PHONE 903/654-3045  
FAX 903/872-6858

BOARD CERTIFIED IN CRIMINAL LAW  
TEXAS BOARD OF LEGAL SPECIALIZATION

September 22, 1996

Johnny Webb 626756  
Rt. 4, Box 1100  
Rosharon, Texas 77583

Dear Johnny,

Mr. Pearce has kept me up to date on your various problems and has shared various correspondence with me regarding your eligibility for parole, etc. As you are aware, I have written extensively to the Board of Pardons and Paroles seeking special review and out-of-sequence consideration.

In all cases, I have been informed that certain "disciplinary matters" on your record prevent serious parole consideration, notwithstanding the fact that some of these matters may be a result of circumstances beyond your control.

I want you to understand that your assistance to the State in the Willingham case has not been forgotten; and that any ~~reasonable means available to me to shorten your incarceration~~ will be explored. I would ask you to keep a "lower profile" in your adversarial proceedings with the prison system. I am not asking you to waive any rights or forego any relief to which you may be entitled, but at the same time, I believe it will be to your advantage not to undertake essentially meaningless reprisals against prison personnel or authorities.

As you know, it is very easy for me to preach patience to you, and very difficult for you to accept. At the same time, I would ask that you not take any actions which jeopardize the efforts of persons working in your behalf.

With best regards,

John H. Jackson

JOHN E. JACKSON  
ATTORNEY AT LAW  
P.O. Box 1  
Rosharon, Texas 75583

626256  
8-2-17

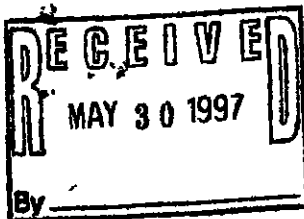
Jenny Webb No. 626756  
Texas Dept. of Criminal Justice  
Rt. 4, Box 1100  
Rosharon, Texas 75583



77583-9584

Handwritten address label: Jenny Webb No. 626756

# **APPENDIX 22**



TEXAS BOARD OF PARDONS AND PAROLES  
8610 SHOAL CREEK BOULEVARD  
P.O. BOX 13401  
AUSTIN, TEXAS 78711

*File*

May 22, 1997

HONORABLE KENNETH A. DOUGLAS  
DISTRICT JUDGE  
JUDICIAL DISTRICT COURT #13  
NAVARRO COUNTY  
P.O. BOX 333  
CORSICANA, TX 75110-0333

RE: COMMUTATION OF SENTENCE CONSIDERATION  
WEBB, JOHNNY E.  
TDCJ-ID #626256  
CAUSE NUMBER(S): 24490

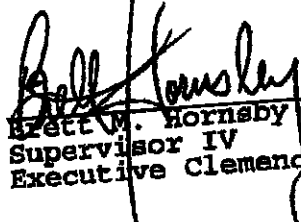
DEAR DISTRICT JUDGE,

In compliance with Section 8(h) of Article 42.18 C.C.P., you are hereby notified that the Board of Pardons and Paroles has recommended a Commutation of Sentence in the above referenced case.

Those convictions for which the subject was incarcerated in the Texas Department of Criminal Justice - Identification Division are listed on the subsequent page(s) of this correspondence.

Now that the Board has recommended a Commutation of Sentence, direct any further input to the Governor's Office of the General Counsel, 1100 San Jacinto, 4th floor, Austin, Texas 78701.

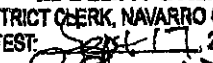

Sincerely,

  
Brett M. Hornsby  
Supervisor IV  
Executive Clemency Unit

97 JUN -3 PM 2:53  
MARILYN GREER  
DISTRICT CLERK  
NAVARRO COUNTY, TEXAS  
DEPUTY

FILED

BH/ht  
cc: file  
COS08A.NTO

CERTIFIED A TRUE COPY  
MARILYN GREER  
DISTRICT CLERK, NAVARRO COUNTY, TX  
ATTEST:  20 10  
BY:  DEPUTY

# **APPENDIX 23**

No. 24,490

THE STATE OF TEXAS                   §           IN THE DISTRICT COURT  
VS                                       §           OF  
JOHNNY E. WEBB                       §           NAVARRO COUNTY, TEXAS

BENCH WARRANT

TO THE TEXAS DEPARTMENT OF CRIMINAL JUSTICE:

JOHNNY E. WEBB, TDC #626256, a prisoner said to be in your official custody, was convicted in the 13th Judicial District of Navarro County, Texas, for the offense of Robbery in the above numbered cause on the docket of said Court.

The above entitled and numbered cause has been set in said Court on Tuesday, January 21, 1997, for <sup>a hearing relative</sup> protective custody pending executive clemency.

You are, therefore, requested and directed to deliver to the bearer hereof, the Sheriff of Navarro County, Texas, or any of his deputies, the custody of the said defendant for the purposes and reasons stated above, in order that he may appear in said court on the above date.

WITNESS my hand at the City of Corsicana, Navarro County, Texas, this the 16 day of January, 1997.

*2:30*  
JAN 16 1997  
CLERK

*[Signature]*  
JAN 16 1997

THE STATE OF TEXAS

COUNTY OF NAVARRO

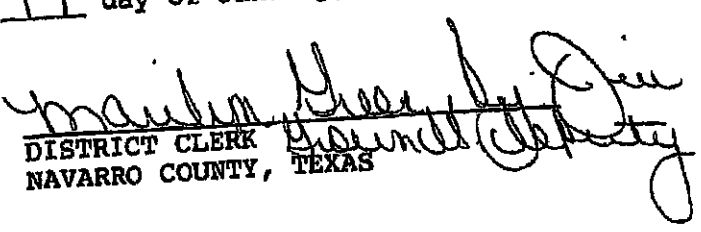
I, the undersigned, Clerk of the District Court of Navarro County, Texas, do hereby certify that the Judge whose genuine

*[Signature]*  
DISTRICT JUDGE

CS9

signature is appended to the foregoing Bench Warrant, is now,  
and was, at the time of signing the same, Judge of the 13th  
Judicial District Court of Navarro County, Texas.

GIVEN under my hand and seal of said Court at office in the  
City of Corsicana, Texas, this 17 day of January, 1997.

  
DISTRICT CLERK  
NAVARRO COUNTY, TEXAS

Number 24,490

vs. State  
Welder  
Bench Warrant  
NAME OF PROCESS

deliver to Sheriff on 1-17-97  
DATE

By Dommie Ray Deputy



# **APPENDIX 24**

# NAVARRO COUNTY



**JOHN H. JACKSON**

JUDGE, 13TH JUDICIAL DISTRICT COURT  
NAVARRO COUNTY COURTHOUSE  
P.O. BOX 333  
CORSIANA, TEXAS 75151-0333

DIXIE FINCHER  
COURT COORDINATOR  
(903) 654-3020

LESLIE KIRK  
OFFICIAL REPORTER  
(903) 654-3022

August 1, 2000

Johnny E. Webb #626256  
James V. Allred Unit  
2101 FM 369N  
Iowa Park, Texas 76367

Dear Johnny,

I hope this letter finds you well and in good spirits despite your present circumstances. Mr. Pierce and I visit on a regular basis concerning your problems.

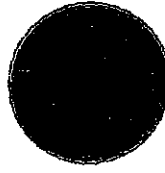
Please understand that as a prosecutor, I very much appreciated your assistance in a very important case. We worked for a long time on a number of different levels, including the Governor's Office to get you released early in the robbery case and it was disappointing to us that you returned to prison after only a short time outside. Please understand that I am not indifferent or insensitive to your difficulties. From my standpoint, it seems there is no good option. As you know, GenPop, AdSeg, and Safekeeping all have their respective drawbacks. Some of the same problems will exist even if I bring you back on a bench warrant to Navarro County. As I remember, the last time you came back on a warrant, things were less than positive.

Please write me directly and let me know what you believe is the most positive option. I am not completely convinced that service of a long stretch awaiting parole in Navarro County is the optimum solution and may in fact prolong your release date. The prison and parole system remains a mystery to me, even after all these years. Certainly, I do not want to take any action which will have the effect of creating additional problems for you.

With best regards,

  
John H. Jackson

# **APPENDIX 25**



CHAMBERS OF  
**JOHN H. JACKSON**

RO. BOX 1  
POWELL, TX 75155

JUDGE, 13TH DISTRICT COURT  
NAVARRO COUNTY, TEXAS

COURTHOUSE  
CORRICANA, TX 75110

August 15, 2000

Johnny E. Webb  
2101 FM 369N  
Iowa Park, TX 76367


Dear Johnny,

I received your letter today and your suggestions seem appropriate. I will hold off any action until I hear from you in September. Let me know if I need to correspond with anyone in the prison system regarding your requests. If you think my intervention might lend support to a transfer, etc. I will be happy to write.

0001

Do your best to stay out of trouble!

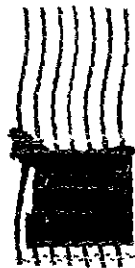
With regards,

  
John H. Jackson



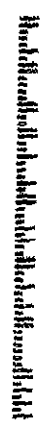
JOHN H. JACKSON  
DIRECTOR JEPAGE  
P.O. BOX 1  
POWELL, TX 75153

40-32



Jeremy R. Webb #626256  
JRM@v. Allied Unit  
2100TH 369 N  
LowOark, TX 76367

76367-6368 02



# **APPENDIX 26**

No. 24,490

THE STATE OF TEXAS

VS

JOHNNY WEBB

§

§

§

IN THE DISTRICT COURT

2000 OCT 19 AM 9:33

OF

NAVARRO COUNTY, TEXAS

MARILYN GREER

DISTRICT CLERK

NAVARRO COUNTY, TEXAS

DEPUTY

BENCH WARRANT

TO THE TEXAS DEPARTMENT OF CRIMINAL JUSTICE:

JOHNNY WEBB, a prisoner said to be in your official custody, was convicted in the 13th Judicial District Court of Navarro County, Texas, for the offense of ROBBERY in the above numbered cause on the docket of said Court.

The above entitled and numbered cause has been set down for a hearing in said Court at 10:00 a.m. on Monday, October 30, 2000.

You are, therefore, requested and directed to deliver to the bearer hereof, the Sheriff of Navarro County, Texas, or any of his deputies, the custody of the said defendant for the purposes and reasons stated above, in order that he may be present for said hearing.

WITNESS my hand <sup>at</sup> the City of Corsicana, Navarro County, Texas, this the 19<sup>th</sup> day of October, 2000.

*[Signature]*  
DISTRICT CLERK

THE STATE OF TEXAS

COUNTY OF NAVARRO

I, the undersigned, Clerk of the District Court of Navarro County, Texas, do hereby certify that the Judge whose genuine signature is appended to the foregoing Bench Warrant, is now, and was, at the time of signing the same, Judge of the 13th Judicial District Court of Navarro County, Texas.

GIVEN under my hand and seal of said Court at office in the City of Corsicana, Texas, this 19 day of October, 2000.

*[Signature]*  
DISTRICT CLERK  
NAVARRO COUNTY, TEXAS

100 please allow defendant's personal effects to be transported also: *[Signature]*

State

VS.

Weld

Search Warrant

NAME OF PROCESS

Number 24490

Deliver to Sheriff on

10-19-00

DATE

By

Deputy



# **APPENDIX 27**

Date	Amount
1/15/1993	\$ 50.00
5/21/1993	\$ 20.00
9/15/1993	\$ 20.00
12/27/1993	\$ 50.00
2/18/1994	\$ 30.00
3/31/1994	\$ 50.00
6/13/1994	\$ 50.00
9/8/1994	\$ 100.00
1/2/1995	\$ 50.00
3/13/1995	\$ 50.00
6/7/1995	\$ 50.00
7/18/1995	\$ 100.00
11/14/1995	\$ 100.00
1/11/1996	\$ 100.00
5/7/1996	\$ 100.00
7/31/1996	\$ 100.00
10/22/1996	\$ 100.00
12/3/1998	\$ 200.00
3/10/1999	\$ 100.00
7/30/1999	\$ 100.00
10/22/1999	\$ 200.00
2/8/2000	\$ 100.00
4/19/2000	\$ 100.00
7/6/2000	\$ 100.00
5/14/2001	\$ 200.00
11/27/2001	\$ 200.00
<b>3/26/2002</b>	<b>\$ 200.00</b>
8/21/2002	\$ 200.00
12/17/2002	\$ 200.00
	<b><u>\$ 3,020.00</u></b>

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TDCNO.	NAME	DATE	AMOUNT	LOG.	TRANSACTION	REPORT	TYPE	SENDEE
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PAGE NO. 1

TDCNO.	NAME	DATE	AMOUNT	LOG.	TRANSACTION	REPORT	TYPE	SENDEE
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00559803	WEBB	JOHNNY	11/10/92	0.00	XX ZERO BALANCE	498901	B3	3
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ITS711 - 03/18/14

TEXAS DEPARTMENT OF CORRECTIONS  
INMATE BANKING - TRANSACTION HISTORY

PAGE NO. 1

TDCNO.	NAME	DATE	AMOUNT	LOC.	TRANSACTION	REPORT	TYPE	SENDEE	
00626256	WEBB	JOHNNY	11/05/92	25.00	DU	CA DIAG MISC	238610	B1	DIAGNOSTIC UNIT 3
00626256	WEBB	JOHNNY	11/05/92	25.00	DU	CP COMMISSARY PURCHASE	496710	B4	3
00626256	WEBB	JOHNNY	11/05/92	0.00	DU	CP	496710	I	INDIGENT
00626256	WEBB	JOHNNY	11/06/92	25.00	CO		DU081W	W0	1106921597450066437
00626256	WEBB	JOHNNY	11/20/92	0.00	CM		FE041R	B4	1120921348456405876
00626256	WEBB	JOHNNY	11/20/92	10.00	MO	751100	245940	B1	G STEELE 3
00626256	WEBB	JOHNNY	11/30/92	9.20	CM		FE041R	B4	1127921324456405876
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00626256	WEBB	JOHNNY	12/07/92	20.00	MO	47190920703	253418	B1	SHIRLEY & DONALD 3
00626256	WEBB	JOHNNY	12/08/92	12.50	CM		FE041R	B4	1208920843461589207
00626256	WEBB	JOHNNY	12/09/92	20.00	MO	471909330862	254631	B1	G STEELE 3
00626256	WEBB	JOHNNY	12/15/92	8.28	CM		FE041R	B4	1215921034456405876
00626256	WEBB	JOHNNY	12/28/92	0.00	CO		EA031R	I	1228920744465337591
00626256	WEBB	JOHNNY	12/28/92	18.48	CM		EA031R	B4	1228920744465337591
00626256	WEBB	JOHNNY	12/29/92	10.00	MO	47190933292	260810	B1	G STEELE 3
00626256	WEBB	JOHNNY	01/04/93	10.10	CM		EA031R	B4	0104930922448688416
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00626256	WEBB	JOHNNY	01/25/93	6.16	CM		SV031R	B4	0124931316455848377
00626256	WEBB	JOHNNY	02/01/93	7.53	CM		SV031R	B4	0131931050464497776
00626256	WEBB	JOHNNY	02/03/93	10.00	MO	47190958042	283535	B1	G STEELE 3
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00626256	WEBB	JOHNNY	02/16/93	7.64	CM		SV031R	B4	0215931155455848377
00626256	WEBB	JOHNNY	02/22/93	15.57	CM		EA031R	B4	0222930659465337591
00626256	WEBB	JOHNNY	02/25/93	10.00	MO	47866621263	296230	B1	G STEELE 3
00626256	WEBB	JOHNNY	03/01/93	5.39	CM		EA031R	B4	0301930850448688416
00626256	WEBB	JOHNNY	03/05/93	20.00	MO	47866625616	300223	B1	D WEBB 3
00626256	WEBB	JOHNNY	03/08/93	17.41	CM		EA031R	B4	0308930839448688416
00626256	WEBB	JOHNNY	03/15/93	19.23	CM		EA031R	B4	0315930847448688416
00626256	WEBB	JOHNNY	03/15/93	0.00	CO		EA031R	I	0315930847448688416
00626256	WEBB	JOHNNY	03/22/93	3.75	CM		EA031R	B4	0322930748465337591
00626256	WEBB	JOHNNY	04/02/93	10.00	MO	47866633751	316106	B1	S WEBB 3
00626256	WEBB	JOHNNY	04/14/93	10.00	MO	47866638677	321806	B1	G STEELE 3
00626256	WEBB	JOHNNY	04/16/93	10.00	MO	4719092337	323449	B1	S WEBB 3
00626256	WEBB	JOHNNY	04/23/93	17.56	CM		EA031R	B4	0423931019448688416
00626256	WEBB	JOHNNY	05/03/93	12.06	CM		EA031R	B4	0503930734465337591
00626256	WEBB	JOHNNY	05/03/93	0.00	CO		EA031R	I	0503930734465337591
00626256	WEBB	JOHNNY	05/10/93	0.45	CM		EA031R	B4	0510930731465337591
00626256	WEBB	JOHNNY	05/13/93	20.00	MO	4786668162	337927	B1	S WEBB 3
00626256	WEBB	JOHNNY	05/21/93	20.00	MO	47866657757	341701	B1	C PEARCE 3
00626256	WEBB	JOHNNY	05/24/93	15.98	CM		EA031R	B4	0524930833448688416
00626256	WEBB	JOHNNY	05/26/93	15.00	MO	478666663697	343702	B1	G STTLE 3
00626256	WEBB	JOHNNY	06/02/93	27.92	CM		EA031R	B4	0602930813448688416
00626256	WEBB	JOHNNY	06/07/93	8.20	CM		EA031R	B4	0607930749448688416
00626256	WEBB	JOHNNY	06/07/93	0.00	CO		EA031R	I	0607930749448688416
00626256	WEBB	JOHNNY	06/10/93	10.00	MO	48197808281	352966	B1	S WEBB 3

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TDCNO.	NAME	DATE	AMOUNT	LOC.	TRANSACTION	REPORT	TYPE	SENDEE
00626256	WEBB	JOHNNY	06/14/93	10.98	CM	EA03IR	B4	0614930701465337591
00626256	WEBB	JOHNNY	06/14/93	0.00	CO	EA03IN	I	0614930701465337591
00626256	WEBB	JOHNNY	06/21/93	1.75	CM	EA03IR	B4	0621930841448688416
00626256	WEBB	JOHNNY	07/05/93	0.00	CM	EA03IR	B4	0705930830448688416
00626256	WEBB	JOHNNY	07/05/93	10.00	MO 48197821342	365422	B1	G STEELE
00626256	WEBB	JOHNNY	07/12/93	0.00	CO	EA03IN	I	0712930923448688416
00626256	WEBB	JOHNNY	07/12/93	9.93	CM	EA03IR	B4	0712930923448688416
00626256	WEBB	JOHNNY	07/16/93	10.00	MO 48197826832	371819	B1	S WEBB
00626256	WEBB	JOHNNY	07/19/93	9.00	CM	EA03IR	B4	0719930858448688416
00626256	WEBB	JOHNNY	07/19/93	0.00	CO	EA03IN	I	0719930858448688416
00626256	WEBB	JOHNNY	07/26/93	1.23	CM	EA03IR	B4	0726930913448688416
00626256	WEBB	JOHNNY	07/28/93	7.00	MO 48197833435	378111	B1	G STEELE
00626256	WEBB	JOHNNY	07/28/93	10.00	MO 48197829532	378111	B1	S WEBB
00626256	WEBB	JOHNNY	08/03/93	9.24	CM	EA03IR	B4	0803930855465337591
00626256	WEBB	JOHNNY	08/06/93	10.00	MO 48197834267	383063	B1	S WEBB
00626256	WEBB	JOHNNY	08/09/93	10.00	MO 48197830836	383228	B1	G STEELE
00626256	WEBB	JOHNNY	08/10/93	6.99	CM	EA03IR	B4	0810930857448688416
00626256	WEBB	JOHNNY	08/17/93	20.65	CM	EA03IR	B4	0817930845448688416
00626256	WEBB	JOHNNY	08/17/93	0.00	CO	EA03IN	I	0817930845448688416
00626256	WEBB	JOHNNY	08/30/93	10.00	MO 48197848162	394733	B1	G STEELE
00626256	WEBB	JOHNNY	09/02/93	9.25	CM	EA03IR	B4	0902930930448688416
00626256	WEBB	JOHNNY	09/02/93	0.00	CO	EA03IN	I	0902930930448688416
00626256	WEBB	JOHNNY	09/03/93	10.00	MO 48197851108	200339	B1	S WEBB
00626256	WEBB	JOHNNY	09/07/93	0.00	CO	EA03IN	I	0907930813448688416
00626256	WEBB	JOHNNY	09/07/93	10.74	CM	EA03IR	B4	0907930813448688416
00626256	WEBB	JOHNNY	09/14/93	0.00	CM	EA03IR	B4	0914930825448688416
00626256	WEBB	JOHNNY	09/15/93	20.00	MO 48197844720	207458	B1	C PEARCE
00626256	WEBB	JOHNNY	09/17/93	20.00	MO 48197852627	209066	B1	S WEBB
00626256	WEBB	JOHNNY	09/21/93	15.70	CM	EA03IR	B4	0921930911448688416
00626256	WEBB	JOHNNY	09/23/93	10.00	MO 48197845754	212812	B1	G STEELE
00626256	WEBB	JOHNNY	09/28/93	14.58	CM	EA03IR	B4	0928930823448688416
00626256	WEBB	JOHNNY	09/30/93	20.00	MO 48683840253	218149	B1	S WEBB
00626256	WEBB	JOHNNY	09/30/93	30.00	MO 48107737361	218117	B5	C HILL
00626256	WEBB	JOHNNY	10/05/93	17.44	CM	EA03IR	B4	1005930809448688416
00626256	WEBB	JOHNNY	10/06/93	10.00	MO 48683840264	220769	B1	G STEELE
00626256	WEBB	JOHNNY	10/12/93	20.69	CM	EA03IR	B4	1012930843448688416
00626256	WEBB	JOHNNY	10/19/93	8.90	CM	EA03IR	B4	1019930953448688416
00626256	WEBB	JOHNNY	10/19/93	0.00	CO	EA03IN	I	1019930953448688416
00626256	WEBB	JOHNNY	10/26/93	0.95	CM	EA03IR	B4	1026930717465337591
00626256	WEBB	JOHNNY	11/02/93	1.75	CM	EA03IR	B4	1102930813448688416
00626256	WEBB	JOHNNY	11/04/93	20.00	MO 48683856767	242248	B1	S WEBB
00626256	WEBB	JOHNNY	11/09/93	19.45	CM	EA03IR	B4	1109930829448688416
00626256	WEBB	JOHNNY	11/09/93	0.00	CO	EA03IN	I	1109930829448688416
00626256	WEBB	JOHNNY	11/16/93	0.65	CM	EA03IR	B4	1116930834448688416
00626256	WEBB	JOHNNY	11/17/93	20.00	MO 48683866241	249421	B1	S WEBB
00626256	WEBB	JOHNNY	11/23/93	19.15	CM	EA03IR	B4	1123931052448688416
00626256	WEBB	JOHNNY	11/23/93	0.00	CO	EA03IN	I	1123931052448688416
00626256	WEBB	JOHNNY	11/29/93	0.00	CM	EA03IR	B4	1129930854465337591
00626256	WEBB	JOHNNY	12/01/93	20.00	MO 48683861010	256052	B1	S WEBB

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TDCNO.	NAME	DATE	AMOUNT	LOC.	TRANSACTION	REPORT	TYPE	SENDEE	
00626256	WEBB	JOHNNY	12/07/93	20.62	CM	EA031R	B4	1207930917448688416	
00626256	WEBB	JOHNNY	12/07/93	0.00	CO	EA031R	I	1207930917448688416	
00626256	WEBB	JOHNNY	12/14/93	0.00	CM	EA031R	B4	1214930823448688416	
00626256	WEBB	JOHNNY	12/20/93	10.00	MO 49210746096	270265	B1	G STEELE	2
00626256	WEBB	JOHNNY	12/21/93	10.12	CM	EA031R	B4	1221930927448688416	
00626256	WEBB	JOHNNY	12/21/93	0.00	CO	EA031R	I	1221930927448688416	
00626256	WEBB	JOHNNY	12/22/93	20.00	MO 49210749055	272720	B1	S WEBB	2
00626256	WEBB	JOHNNY	12/27/93	50.00	MO 49210751147	274501	B1	C PEARCE	2
00626256	WEBB	JOHNNY	12/28/93	19.55	CM	EA031R	B4	1228930832448688416	
00626256	WEBB	JOHNNY	12/28/93	20.00	MO 49210747323	274752	B1	S WEBB	2
00626256	WEBB	JOHNNY	01/04/94	54.04	CM	EA031R	B4	0104941042448688416	
00626256	WEBB	JOHNNY	01/11/94	4.75	CM	EA031R	B4	0111940859448688416	
00626256	WEBB	JOHNNY	01/20/94	0.00	CO	EA051R	I	0120940917448688416	
00626256	WEBB	JOHNNY	01/20/94	11.69	CM	EA051R	B4	0120940917448688416	
00626256	WEBB	JOHNNY	01/20/94	20.00	MO 49210744127	290264	B1	S WEBB	2
00626256	WEBB	JOHNNY	01/24/94	10.00	MO 49210750225	293837	B1	G STEELE	2
00626256	WEBB	JOHNNY	01/25/94	26.85	CM	EA051R	B4	0125940944467627497	
00626256	WEBB	JOHNNY	01/25/94	0.00	CO	EA051R	I	0125940944467627497	
00626256	WEBB	JOHNNY	02/01/94	1.37	CM	EA051R	B4	0201940922467627497	
00626256	WEBB	JOHNNY	02/08/94	1.73	CM	EA051R	B4	0208941145467627497	
00626256	WEBB	JOHNNY	02/15/94	0.00	CM	EA051R	B4	0215940945465337591	
00626256	WEBB	JOHNNY	02/18/94	30.00	MO 49210774288	312736	B1	C PEARCE	2
00626256	WEBB	JOHNNY	02/22/94	22.22	CM	EA051R	B4	0222941024467627497	
00626256	WEBB	JOHNNY	02/24/94	20.00	MO 49210775493	315564	B1	S WEBB	2
00626256	WEBB	JOHNNY	03/01/94	22.45	CM	EA051R	B4	0301941252467627497	
00626256	WEBB	JOHNNY	03/08/94	5.40	CM	EA051R	B4	0308940959465337591	
00626256	WEBB	JOHNNY	03/08/94	0.00	CO	EA051R	I	0308940959465337591	
00626256	WEBB	JOHNNY	03/08/94	20.00	MO 49659197916	323913	B1	S WEBB	2
00626256	WEBB	JOHNNY	03/15/94	19.05	CM	EA051R	B4	0315941018467627497	
00626256	WEBB	JOHNNY	03/15/94	0.00	CO	EA051R	I	0315941018467627497	
00626256	WEBB	JOHNNY	03/22/94	1.00	CM	EA031R	B4	0322941258460413424	
00626256	WEBB	JOHNNY	03/29/94	0.00	CM	EA031R	B4	0329941126460413424	
00626256	WEBB	JOHNNY	03/30/94	20.00	MO 60278155942	341158	B1	S T WEBB	2
00626256	WEBB	JOHNNY	03/31/94	50.00	MO 60278154017	343107	B1	C PEARCE	2
00626256	WEBB	JOHNNY	04/05/94	40.14	CM	EA031R	B4	0405941356460413424	
00626256	WEBB	JOHNNY	04/08/94	10.00	MO 60279653384	348613	B1	S WEBB	2
00626256	WEBB	JOHNNY	04/21/94	39.78	CM	EA031R	B4	0421940801465337591	
00626256	WEBB	JOHNNY	04/21/94	0.00	CO	EA031R	I	0421940801465337591	
00626256	WEBB	JOHNNY	04/25/94	30.00	MO 60278156954	358323	B1	S WEBB	2
00626256	WEBB	JOHNNY	05/11/94	40.00	MO 21286022800	368337	B1	M CLARK	2
00626256	WEBB	JOHNNY	05/12/94	42.27	CM	EA031R	B4	0512941155460413424	
00626256	WEBB	JOHNNY	05/19/94	27.85	CM	EA031R	B4	0519941106460413424	
00626256	WEBB	JOHNNY	05/19/94	0.00	CO	EA031R	I	0519941106460413424	
00626256	WEBB	JOHNNY	05/26/94	0.00	CM	EA031R	B4	0526941224460413424	
00626256	WEBB	JOHNNY	06/02/94	0.00	CM	EA031R	B4	0602941008465337591	
00626256	WEBB	JOHNNY	06/02/94	0.00	CM	EA031R	B4	0602941015465337591	
00626256	WEBB	JOHNNY	06/02/94	20.00	MO 60279674016	384319	B1	S WEBB	2
00626256	WEBB	JOHNNY	06/09/94	19.90	CM	EA031R	B4	0609940922460413424	
00626256	WEBB	JOHNNY	06/09/94	0.00	CO	EA031R	I	0609940922460413424	

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00626256	WEBB	JOHNNY	06/13/94	50.00	MO 60279661776	391242	B1	C PEARCE	2
00626256	WEBB	JOHNNY	06/16/94	46.40	CM	EA03IR	B4	0616940845465337591	
00626256	WEBB	JOHNNY	06/16/94	0.00	CO	EA03IN	I	0616940845465337591	
00626256	WEBB	JOHNNY	06/23/94	3.20	CM	EA03IR	B4	0623941100460413424	
00626256	WEBB	JOHNNY	06/29/94	0.00	CM	EA03IR	B4	0629941120460413424	
00626256	WEBB	JOHNNY	07/05/94	20.00	MO 60279680553	404104	B1	S WEBB	2
00626256	WEBB	JOHNNY	07/07/94	20.49	CM	EA03IR	B4	0707941256460413424	
00626256	WEBB	JOHNNY	07/07/94	0.00	CO	EA03IN	I	0707941256460413424	
00626256	WEBB	JOHNNY	07/19/94	20.00	MO 60736925621	415510	B1	S WEBB	2
00626256	WEBB	JOHNNY	07/28/94	19.97	CM	EA03IR	B4	0728940903460413424	
00626256	WEBB	JOHNNY	07/28/94	0.00	CO	EA03IN	I	0728940903460413424	
00626256	WEBB	JOHNNY	08/04/94	0.00	CM	EA03IR	B4	0804941128460413424	
00626256	WEBB	JOHNNY	08/11/94	0.00	CM	EA03IR	B4	0811941043460413424	
00626256	WEBB	JOHNNY	08/11/94	20.00	MO 60882620894	430806	B1	J WEBB	2
00626256	WEBB	JOHNNY	08/18/94	19.96	CM	EA03IR	B4	0818941320460413424	
00626256	WEBB	JOHNNY	08/18/94	0.00	CO	EA03IN	I	0818941320460413424	
00626256	WEBB	JOHNNY	08/22/94	20.00	MO 60882623133	438452	B1	S T WEBB	2
00626256	WEBB	JOHNNY	08/25/94	9.88	CM	EA03IR	B4	0825941035460413424	
00626256	WEBB	JOHNNY	09/01/94	10.00	CM	EA03IR	B4	0901941300465337591	
00626256	WEBB	JOHNNY	09/01/94	0.00	CO	EA03IN	I	0901941300465337591	
00626256	WEBB	JOHNNY	09/08/94	0.00	CM	EA03IR	B4	0908941113453134951	
00626256	WEBB	JOHNNY	09/08/94	100.00	MO 60882639434	202743	B1	C PEARCE	2
00626256	WEBB	JOHNNY	09/15/94	50.19	CM	EA03IR	B4	0915941004465337591	
00626256	WEBB	JOHNNY	09/22/94	26.75	CM	EA03IS	B4	0922940847460413424	
00626256	WEBB	JOHNNY	09/22/94	21.95	CM	EA03IR	B4	0922940849460413424	
00626256	WEBB	JOHNNY	09/22/94	0.00	CO	EA03IN	I	0922940849460413424	
00626256	WEBB	JOHNNY	09/23/94	20.00	MO 60882638646	212337	B1	S T WEBB	2
00626256	WEBB	JOHNNY	09/29/94	20.60	CM	EA03IR	B4	0929941120460413424	
00626256	WEBB	JOHNNY	09/29/94	0.00	CO	EA03IN	I	0929941120460413424	
00626256	WEBB	JOHNNY	10/06/94	0.70	CM	EA03IR	B4	1006941249460413424	
00626256	WEBB	JOHNNY	10/18/94	20.00	MO 60887279068	227371	B1	S WEBB	2
00626256	WEBB	JOHNNY	10/20/94	19.95	CM	EA05IR	B4	1020941108467627497	
00626256	WEBB	JOHNNY	10/20/94	0.00	CO	EA05IN	I	1020941108467627497	
00626256	WEBB	JOHNNY	11/03/94	0.00	CM	EA03IR	B4	1103941155465337591	
00626256	WEBB	JOHNNY	11/10/94	0.00	CM	EA03IR	B4	1110941121460413424	
00626256	WEBB	JOHNNY	11/14/94	20.00	MO 60882641976	245443	B1	S WEBB	2
00626256	WEBB	JOHNNY	11/17/94	20.00	CM	EA03IR	B4	1117941223460413424	
00626256	WEBB	JOHNNY	11/17/94	0.00	CO	EA03IN	I	1117941223460413424	
00626256	WEBB	JOHNNY	11/22/94	0.00	CM	EA03IR	B4	1122940726460413424	
00626256	WEBB	JOHNNY	12/01/94	15.00	MO 60882653654	256409	B1	S WEBB	2
00626256	WEBB	JOHNNY	12/07/94	20.00	MO 60882649806	261490	B1	S WEBB	2
00626256	WEBB	JOHNNY	12/08/94	34.95	CM	EA03IR	B4	1208941017460413424	
00626256	WEBB	JOHNNY	12/08/94	0.00	CO	EA03IN	I	1208941017460413424	
00626256	WEBB	JOHNNY	12/15/94	0.00	CM	EA03IR	B4	1215940956460413424	
00626256	WEBB	JOHNNY	12/15/94	50.00	MO 21303778636	266189	B1	J COLEMAN	2
00626256	WEBB	JOHNNY	12/22/94	48.45	CM	EA03IR	B4	1222941158460413424	
00626256	WEBB	JOHNNY	12/22/94	0.00	CO	EA03IN	I	1222941158460413424	
00626256	WEBB	JOHNNY	12/29/94	0.85	CM	EA03IR	B4	1229941112453134951	
00626256	WEBB	JOHNNY	01/02/95	50.00	MO 61625617604	276156	B1	C PEARCE	2

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TDCNO.	NAME	DATE	AMOUNT	LOC.	TRANSACTION	REPORT	TYPE	SENDEE
00626256	WEBB	JOHNNY	01/05/95	50.60	CM	EA03IR	B4	0105951211460413424
00626256	WEBB	JOHNNY	01/05/95	0.00	CO	EA03IN	I	0105951211460413424
00626256	WEBB	JOHNNY	01/12/95	0.00	CM	EA03IR	B4	0112951237460413424
00626256	WEBB	JOHNNY	01/18/95	20.00	MO	61625623061	285874	B1 S WEBB 2
00626256	WEBB	JOHNNY	01/19/95	7.40	CM	EA03IR	B4	0119951307460413424
00626256	WEBB	JOHNNY	01/19/95	12.50	CM	EA03IS	B4	0119951308460413424
00626256	WEBB	JOHNNY	01/19/95	0.00	CO	EA03IN	I	0119951308460413424
00626256	WEBB	JOHNNY	01/23/95	50.00	MO	21312138166	291609	B1 D JONES 2
00626256	WEBB	JOHNNY	01/27/95	38.77	CM	EA03IR	B4	0127951216460413424
00626256	WEBB	JOHNNY	01/27/95	20.00	MO	61625630507	295829	B1 S WEBB 2
00626256	WEBB	JOHNNY	02/02/95	10.44	CM	EA03IR	B4	0202951138460413424
00626256	WEBB	JOHNNY	02/09/95	0.00	CO	EA03IN	I	0209951311460413424
00626256	WEBB	JOHNNY	02/09/95	19.85	CM	EA03IR	B4	0209951311460413424
00626256	WEBB	JOHNNY	02/09/95	50.00	MO	21312138998	302567	B1 M KELLY 2
00626256	WEBB	JOHNNY	02/15/95	20.00	MO	61631180065	310016	B1 S T WEBB 2
00626256	WEBB	JOHNNY	02/16/95	40.02	CM	EA03IR	B4	0216950753465337591
00626256	WEBB	JOHNNY	02/23/95	31.18	CM	EA03IR	B4	0223950931460413424
00626256	WEBB	JOHNNY	02/23/95	0.00	CO	EA03IN	I	0223950931460413424
00626256	WEBB	JOHNNY	03/03/95	20.00	MO	61631192946	323829	B1 S WEBB 2
00626256	WEBB	JOHNNY	03/13/95	50.00	MO	61631197233	330772	B1 C PEARCE 2
00626256	WEBB	JOHNNY	03/16/95	59.96	CM	EA03IR	B4	0316951259460413424
00626256	WEBB	JOHNNY	03/23/95	8.10	CM	EA03IR	B4	0323951055460413424
00626256	WEBB	JOHNNY	03/23/95	0.00	CO	EA03IN	I	0323951055460413424
00626256	WEBB	JOHNNY	03/29/95	50.00	MO		347158	B1 D JONES 2
00626256	WEBB	JOHNNY	03/30/95	18.65	CM	EA03IR	B4	0330950903460413424
00626256	WEBB	JOHNNY	04/06/95	28.90	CM	EA03IR	B4	0406950938460413424
00626256	WEBB	JOHNNY	04/06/95	0.00	CO	EA03IN	I	0406950938460413424
00626256	WEBB	JOHNNY	04/13/95	4.35	CM	EA03IR	B4	0413951004460413424
00626256	WEBB	JOHNNY	04/20/95	0.00	CM	EA03IR	B4	0420951237460413424
00626256	WEBB	JOHNNY	04/21/95	20.00	MO	61631209877	371332	B1 S WEBB 2
00626256	WEBB	JOHNNY	04/24/95	5.00	MO	61905576150	372305	B1 S T WEBB 2
00626256	WEBB	JOHNNY	04/27/95	23.45	CM	EA03IR	B4	0427951033460413424
00626256	WEBB	JOHNNY	04/27/95	0.00	CO	EA03IN	I	0427951033460413424
00626256	WEBB	JOHNNY	05/04/95	1.60	CM	EA03IR	B4	0504950914460413424
00626256	WEBB	JOHNNY	05/05/95	20.00	MO	61905584632	386934	B1 S WEBB 2
00626256	WEBB	JOHNNY	05/11/95	4.35	CM	EA03IR	B4	0511951042460413424
00626256	WEBB	JOHNNY	05/19/95	15.55	CM	EA03IR	B4	0519951029460413424
00626256	WEBB	JOHNNY	05/19/95	0.00	CO	EA03IN	I	0519951029460413424
00626256	WEBB	JOHNNY	05/25/95	0.00	CM	EA03IR	B4	0525950857460413424
00626256	WEBB	JOHNNY	06/01/95	0.00	CM	EA03IR	B4	0601951022460413424
00626256	WEBB	JOHNNY	06/07/95	50.00	MO	61905597423	412264	B1 C PEARCE 2
00626256	WEBB	JOHNNY	06/08/95	48.45	CM	EA03IR	B4	0608950910460413424
00626256	WEBB	JOHNNY	06/08/95	0.00	CO	EA03IN	I	0608950910460413424
00626256	WEBB	JOHNNY	06/15/95	0.00	CM	CO05IR	B4	0615951656461419580
00626256	WEBB	JOHNNY	06/19/95	20.00	MO	61905607288	429033	B1 S WEBB 2
00626256	WEBB	JOHNNY	06/20/95	20.00	MO	61905589896	429336	B1 S WEBB 2
00626256	WEBB	JOHNNY	06/21/95	33.93	CM	CO05IR	B4	0621951429289387604
00626256	WEBB	JOHNNY	06/26/95	7.72	CM	WY13IR	B4	0626951226464722876
00626256	WEBB	JOHNNY	06/26/95	0.00	CO	WY13IN	I	0626951226464722876



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TDCNO.	NAME	DATE	AMOUNT	LOC.	TRANSACTION	REPORT	TYPE	SENDEE
00626256	WEBB	JOHNNY	07/03/95	0.00	CM	WY131R	B4	0703951736460597334
00626256	WEBB	JOHNNY	07/10/95	0.00	CM	WY131R	B4	0710951636460597334
00626256	WEBB	JOHNNY	07/18/95	0.00	CM	WY061R	B4	0718950713464722876
00626256	WEBB	JOHNNY	07/18/95	100.00	MO	61905612868	B1	C S PEARCE 2
00626256	WEBB	JOHNNY	07/19/95	20.00	MO	61905606052	B1	S WEBB 2
00626256	WEBB	JOHNNY	07/25/95	43.01	CM	WY061R	B4	0725950751464742209
00626256	WEBB	JOHNNY	08/08/95	20.00	MO	62611798116	B1	S WEBB 2
00626256	WEBB	JOHNNY	08/25/95	20.00	MO	62611797317	B1	S WEBB 2
00626256	WEBB	JOHNNY	09/01/95	20.00	MO	62611810918	B1	S WEBB 2
00626256	WEBB	JOHNNY	09/11/95	60.00	EA	CP COMMISSARY PURCHASE	B4	516306 2
00626256	WEBB	JOHNNY	09/21/95	60.00	CO	EA031W	W0	0921951034453134951
00626256	WEBB	JOHNNY	09/21/95	20.00	MO	62611814518	B1	S WEBB 2
00626256	WEBB	JOHNNY	09/28/95	55.03	CM	EA031R	B4	0928951242460413424
00626256	WEBB	JOHNNY	10/04/95	7.00	OP	LEGAL MANUAL	B4	573509 2
00626256	WEBB	JOHNNY	10/05/95	16.23	CM	EA031R	B4	1005950812460413424
00626256	WEBB	JOHNNY	10/05/95	11.50	CM	EA031S	B4	1005950814460413424
00626256	WEBB	JOHNNY	10/05/95	20.00	MO	62611817995	B1	S WEBB 2
00626256	WEBB	JOHNNY	10/12/95	16.45	CM	EA031R	B4	1012950816460413424
00626256	WEBB	JOHNNY	10/19/95	10.75	CM	EA031R	B4	1019950953460413424
00626256	WEBB	JOHNNY	10/19/95	0.00	CO	EA031N	I	1019950953460413424
00626256	WEBB	JOHNNY	11/02/95	0.00	CM	EA031R	B4	1102951750453134951
00626256	WEBB	JOHNNY	11/02/95	20.00	MO	62611838763	B1	S T WEBB 2
00626256	WEBB	JOHNNY	11/09/95	19.90	CM	EA031R	B4	1109950858460413424
00626256	WEBB	JOHNNY	11/09/95	0.00	CO	EA031N	I	1109950858460413424
00626256	WEBB	JOHNNY	11/14/95	100.00	MO	62611835927	B1	C PEARCE 2
00626256	WEBB	JOHNNY	11/14/95	0.50	EA	AB 000050 000000 POSTAGE	B4	9511140914460983196
00626256	WEBB	JOHNNY	11/16/95	20.75	CM	EA031S	B4	1116950954460413424
00626256	WEBB	JOHNNY	11/16/95	22.90	CM	EA031R	B4	1116950959460413424
00626256	WEBB	JOHNNY	11/21/95	31.55	CM	EA031R	B4	1121950756460413424
00626256	WEBB	JOHNNY	11/30/95	12.62	CM	EA031R	B4	1130950930460413424
00626256	WEBB	JOHNNY	12/05/95	20.00	MO	63194515558	B1	S WEBB 2
00626256	WEBB	JOHNNY	12/07/95	14.50	CM	EA031R	B4	1207951043460413424
00626256	WEBB	JOHNNY	12/11/95	20.00	MO	63194517843	B1	S WEBB 2
00626256	WEBB	JOHNNY	12/14/95	15.35	CM	EA031R	B4	1214950813460413424
00626256	WEBB	JOHNNY	12/21/95	21.45	CM	EA031R	B4	1221950800453134951
00626256	WEBB	JOHNNY	12/21/95	0.00	CO	EA031N	I	1221950800453134951
00626256	WEBB	JOHNNY	12/28/95	0.50	CM	EA031R	B4	1228951223453134951
00626256	WEBB	JOHNNY	01/05/96	0.00	CM	EA031R	B4	0105961039460413424
00626256	WEBB	JOHNNY	01/08/96	20.00	MO	63196313837	B1	S WEBB 2
00626256	WEBB	JOHNNY	01/10/96	10.00	MO	080266770	B1	M BOOTH 2
00626256	WEBB	JOHNNY	01/11/96	7.00	AC	162053	B1	126201 2
00626256	WEBB	JOHNNY	01/11/96	100.00	MO	63196327967	B1	C PEARCE 2
00626256	WEBB	JOHNNY	01/12/96	10.00	MO	330252	B1	D BOOTH 2
00626256	WEBB	JOHNNY	01/16/96	41.60	CM	R1031R	B4	0116961056117388159
00626256	WEBB	JOHNNY	01/18/96	20.00	MO	63196328496	B1	S WEBB 2
00626256	WEBB	JOHNNY	01/24/96	12.80	CM	R1031R	B4	0124960716456024404
00626256	WEBB	JOHNNY	01/30/96	41.70	CM	R1031R	B4	0130960659456024404
00626256	WEBB	JOHNNY	01/31/96	20.00	MO	63683572757	B1	S WEBB 2
00626256	WEBB	JOHNNY	01/31/96	0.70	OP	EASTHAM CLEARING FUND	B4	846355 2

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00626256	WEBB	JOHNNY	02/06/96	0.00	CM	R103IR	B4	0206960818456335953
00626256	WEBB	JOHNNY	02/15/96	12.50	CM	R103IS	B4	0215961030117388159
00626256	WEBB	JOHNNY	02/15/96	50.68	CM	R103IR	B4	0215961037117388159
00626256	WEBB	JOHNNY	02/20/96	8.95	CM	R103IS	B4	0220961053117388159
00626256	WEBB	JOHNNY	02/20/96	7.90	CM	R103IR	B4	0220961058117388159
00626256	WEBB	JOHNNY	02/20/96	1.05	AC	R103CR	B1	0220961125117388159
00626256	WEBB	JOHNNY	02/23/96	20.00	MO 63683577347	358188	B1	S WEBB 2
00626256	WEBB	JOHNNY	02/27/96	11.15	CM	R103IR	B4	0227960707117388159
00626256	WEBB	JOHNNY	03/05/96	6.10	CM	R103IR	B4	0305960733456335953
00626256	WEBB	JOHNNY	03/14/96	20.00	MO 63683593468	371952	B1	S WEBB 2
00626256	WEBB	JOHNNY	03/26/96	30.05	CM	R103IR	B4	0326960637456335953
00626256	WEBB	JOHNNY	03/26/96	0.00	CO	R103IN	I	0326960637456335953
00626256	WEBB	JOHNNY	03/27/96	0.32	R1 AB 000032 000000 POSTAGE	R115	B4	9603271518465710179
00626256	WEBB	JOHNNY	03/29/96	20.00	MO 63688728216	384231	B1	S WEBB 2
00626256	WEBB	JOHNNY	04/02/96	23.60	CM	R103IR	B4	0402961207117388159
00626256	WEBB	JOHNNY	04/02/96	0.00	CO	R103IN	I	0402961207117388159
00626256	WEBB	JOHNNY	04/16/96	0.00	CM	R103IR	B4	0416961018456335953
00626256	WEBB	JOHNNY	04/24/96	30.00	MO 63688733638	401908	B1	S WEBB 2
00626256	WEBB	JOHNNY	05/07/96	0.00	CO	R103IN	I	0507960911456335953
00626256	WEBB	JOHNNY	05/07/96	28.95	CM	R103IR	B4	0507960911456335953
00626256	WEBB	JOHNNY	05/07/96	100.00	MO 63688737431	414223	B1	C PEARCE 2
00626256	WEBB	JOHNNY	05/15/96	25.05	CM	R103IR	B4	0515961057456024404
00626256	WEBB	JOHNNY	05/21/96	33.55	CM	R103IR	B4	0521960745456335953
00626256	WEBB	JOHNNY	05/21/96	33.55	AC	R103CR	B1	0521960829456335953
00626256	WEBB	JOHNNY	05/21/96	32.85	CM	R103IR	B4	0521960831456335953
00626256	WEBB	JOHNNY	05/23/96	20.00	MO 63688745024	430114	B1	S WEBB 2
00626256	WEBB	JOHNNY	05/28/96	1.90	CM	R103IR	B4	0528961257456335953
00626256	WEBB	JOHNNY	06/04/96	43.20	CM	R103IR	B4	0604961549117388159
00626256	WEBB	JOHNNY	06/11/96	14.50	CM	R103IR	B4	0611961319117388159
00626256	WEBB	JOHNNY	06/11/96	0.00	CO	R103IN	I	0611961319117388159
00626256	WEBB	JOHNNY	06/12/96	20.00	MO 63688903345	446134	B1	S WEBB 2
00626256	WEBB	JOHNNY	06/18/96	2.30	CM	R103IR	B4	0618961125456024404
00626256	WEBB	JOHNNY	06/25/96	19.42	CM	R103IR	B4	0625961208456335953
00626256	WEBB	JOHNNY	06/25/96	0.00	CO	R103IN	I	0625961208456335953
00626256	WEBB	JOHNNY	07/02/96	1.80	CM	R103IR	B4	0702961452456335953
00626256	WEBB	JOHNNY	07/08/96	20.00	MO 63688902783	466408	B1	S WEBB 2
00626256	WEBB	JOHNNY	07/09/96	15.40	CM	R103IR	B4	0709961155456335953
00626256	WEBB	JOHNNY	07/09/96	0.00	CO	R103IN	I	0709961155456335953
00626256	WEBB	JOHNNY	07/16/96	3.70	CM	R103IR	B4	0716960533456335953
00626256	WEBB	JOHNNY	07/22/96	11.00	MO 63688912582	476655	B1	S WEBB 2
00626256	WEBB	JOHNNY	07/23/96	0.00	CO	R103IN	I	0723961123117388159
00626256	WEBB	JOHNNY	07/23/96	11.75	CM	R103IR	B4	0723961123117388159
00626256	WEBB	JOHNNY	07/30/96	0.00	CM	R103IR	B4	0730960706456335953
00626256	WEBB	JOHNNY	07/30/96	10.00	MO 64274029435	483604	B1	S WEBB 2
00626256	WEBB	JOHNNY	07/31/96	100.00	MO 63688919253	487816	B1	C PEARCE 2
00626256	WEBB	JOHNNY	08/06/96	8.30	CM	R103IR	B4	0806961016117388159
00626256	WEBB	JOHNNY	08/13/96	41.80	CM	R103IR	B4	0813960627117388159
00626256	WEBB	JOHNNY	08/21/96	15.90	CM	R103IR	B4	0821961116456024404
00626256	WEBB	JOHNNY	08/23/96	20.00	MO 64274026577	210104	B1	S WEBB 2

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00626256	WEBB	JOHNNY	08/27/96	35.85	CM	R1031R	B4	0827960740117388159
00626256	WEBB	JOHNNY	09/03/96	0.00	CM	R1031R	B4	0903961138117388159
00626256	WEBB	JOHNNY	09/10/96	0.00	CO	R1031R	I	0910960720117388159
00626256	WEBB	JOHNNY	09/10/96	24.20	CM	R1031R	B4	0910960720117388159
00626256	WEBB	JOHNNY	09/16/96	20.00	MO	64274044588	214725	S WEBB
00626256	WEBB	JOHNNY	09/17/96	3.00	CM	R1031R	B4	0917961243117388159
00626256	WEBB	JOHNNY	09/24/96	17.30	CM	R1031R	B4	0924960824466886629
00626256	WEBB	JOHNNY	09/24/96	0.00	CO	R1031R	I	0924960824466886629
00626256	WEBB	JOHNNY	10/01/96	3.70	CM	R1031R	B4	1001961354117388159
00626256	WEBB	JOHNNY	10/22/96	0.00	CM	R1031R	B4	1022960620452371496
00626256	WEBB	JOHNNY	10/22/96	100.00	MO	2274022325	003231	251515
00626256	WEBB	JOHNNY	10/25/96	25.00	MO	64863059556	015055	256101
00626256	WEBB	JOHNNY	10/29/96	47.55	CM	R1031R	B4	1029960806452371496
00626256	WEBB	JOHNNY	11/05/96	46.30	CM	R1031R	B4	1105960829117388159
00626256	WEBB	JOHNNY	11/12/96	12.76	CM	R1031R	B4	1112961241117388159
00626256	WEBB	JOHNNY	11/19/96	20.00	MO	64863072483	014191	275605
00626256	WEBB	JOHNNY	11/27/96	11.50	CM	J4091R	B4	1127961255464236312
00626256	WEBB	JOHNNY	12/04/96	18.90	CM	J4091R	B4	1204961351464236312
00626256	WEBB	JOHNNY	12/11/96	5.65	CM	J4091R	B4	1211961227464319315
00626256	WEBB	JOHNNY	12/11/96	0.00	CO	J4091R	I	1211961227464319315
00626256	WEBB	JOHNNY	12/17/96	20.00	MO	65318237267	009364	301105
00626256	WEBB	JOHNNY	12/23/96	6.15	CM	J4091R	B4	1223961406464319315
00626256	WEBB	JOHNNY	12/23/96	16.15	CM	J4091R	B4	1223961407464319315
00626256	WEBB	JOHNNY	12/23/96	6.15	AC	J409CR	B1	1223961407464319315
00626256	WEBB	JOHNNY	01/02/97	5.96	CM	J4091R	B4	0102971440464319315
00626256	WEBB	JOHNNY	01/02/97	0.00	CO	J4091R	I	0102971440464319315
00626256	WEBB	JOHNNY	01/02/97	10.00	MO	65318244401	016954	313615
00626256	WEBB	JOHNNY	01/15/97	0.00	CM	J4091R	B4	0115971340464319315
00626256	WEBB	JOHNNY	01/15/97	20.00	MO	65318241971	011234	323802
00626256	WEBB	JOHNNY	01/16/97	20.00	MO	65318241971	011234	323802
00626256	WEBB	JOHNNY	12/18/97	30.38	XX			763224
00626256	WEBB	JOHNNY	10/14/98	0.00	CM			
00626256	WEBB	JOHNNY	10/20/98	0.00	CM	DU081R	B4	1013980810449808656
00626256	WEBB	JOHNNY	10/22/98	120.21	NH	CA	B4	1020980733449808656
00626256	WEBB	JOHNNY	10/22/98	0.00	NH	CP	COMMISSARY PURCHASE	595406
00626256	WEBB	JOHNNY	10/23/98	8.30	CM	SV031R	B4	1023981041464497776
00626256	WEBB	JOHNNY	10/26/98	6.40	CM	SV031R	B4	1026981030464497776
00626256	WEBB	JOHNNY	10/28/98	9.10	CM	SV031R	B4	1028981020464497776
00626256	WEBB	JOHNNY	10/28/98	30.00	MO	69052576465	011128	030112
00626256	WEBB	JOHNNY	11/04/98	64.95	CM	BY221R	B4	1104980835454316523
00626256	WEBB	JOHNNY	11/10/98	43.20	CM	BY221S	B4	1110981430450741683
00626256	WEBB	JOHNNY	11/16/98	18.00	CM	BY221R	B4	1116981400450741683
00626256	WEBB	JOHNNY	11/16/98	0.00	CO	BY221R	I	1116981400450741683
00626256	WEBB	JOHNNY	12/03/98	0.00	CM	BY221R	B4	1203981425450741683
00626256	WEBB	JOHNNY	12/03/98	200.00	MO	69052572775	001729	033711
00626256	WEBB	JOHNNY	12/08/98	21.75	CM	BY221S	B4	1208981329450741683
00626256	WEBB	JOHNNY	12/09/98	30.00	MO	69703410598	014617	034329
00626256	WEBB	JOHNNY	12/14/98	40.00	MO	69052580550	001203	034814
00626256	WEBB	JOHNNY	12/17/98	100.00	CM	BY221R	B4	1217980831454316523

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TDGNO.	NAME	DATE	AMOUNT	LOC.	TRANSACTION	REPORT	TYPE	SENDEE
00626256	WEBB	JOHNNY	12/30/98	59.85	CM	BY22IR	B4	1230981736450741683
00626256	WEBB	JOHNNY	01/11/99	62.90	CM	BY22IR	B4	0109991248454316523
00626256	WEBB	JOHNNY	01/14/99	11.75	CM	BY22IR	B4	0114991435454316523
00626256	WEBB	JOHNNY	01/19/99	3.00	BY MC	000300 000000UTMB UT	B4	0114991600000000000
00626256	WEBB	JOHNNY	01/19/99	40.00	MO	69703434674 021444	B1	S WEBB
00626256	WEBB	JOHNNY	01/22/99	0.00	CO	BY22IN	I	0122991337454316523
00626256	WEBB	JOHNNY	01/22/99	50.98	CM	BY22IR	B4	0122991337454316523
00626256	WEBB	JOHNNY	02/09/99	0.00	CM	BY22IR	B4	0209991446454316523
00626256	WEBB	JOHNNY	02/10/99	20.00	MO	69658472057 012235	B1	S WEBB
00626256	WEBB	JOHNNY	02/18/99	20.00	CM	BY22IR	B4	0218991428454316523
00626256	WEBB	JOHNNY	02/18/99	0.00	CO	BY22IN	I	0218991428454316523
00626256	WEBB	JOHNNY	03/04/99	0.00	CM	BY22IR	B4	0304991905460764374
00626256	WEBB	JOHNNY	03/10/99	100.00	MO	69658482486 008856	B1	C PEARCE
00626256	WEBB	JOHNNY	03/11/99	53.25	CM	BY22IR	B4	0311990656454316523
00626256	WEBB	JOHNNY	03/15/99	30.00	MO	69658451436 017800	B1	S WEBB
00626256	WEBB	JOHNNY	03/31/99	20.00	MO	83412953133 022243	B1	S WEBB
00626256	WEBB	JOHNNY	06/16/99	3.89	NH AB	000389 000000 POSTAGE	B4	9906161500455373774
00626256	WEBB	JOHNNY	06/29/99	52.11	NH CA	449304	B1	
00626256	WEBB	JOHNNY	06/29/99	0.00	NH CP	COMMISSARY PURCHASE	B4	
00626256	WEBB	JOHNNY	07/05/99	20.00	MO	83717772333 021434	B1	S WEBB
00626256	WEBB	JOHNNY	07/13/99	19.55	CM	J409IR	B4	0713991515456318459
00626256	WEBB	JOHNNY	07/14/99	18.40	CM	J409IR	B4	0714991305456318459
00626256	WEBB	JOHNNY	07/19/99	3.25	CM	J409IS	B4	0719991703449296068
00626256	WEBB	JOHNNY	07/19/99	14.30	CM	J409IS	B4	0719991704449296068
00626256	WEBB	JOHNNY	07/20/99	1.55	CM	J409IR	B4	0720991434449296068
00626256	WEBB	JOHNNY	07/21/99	19.95	CM	J409IR	B4	0721991807449296068
00626256	WEBB	JOHNNY	07/26/99	12.15	CM	J409IS	B4	0726991736449296068
00626256	WEBB	JOHNNY	07/28/99	19.75	CM	J409IR	B4	0728991759449296068
00626256	WEBB	JOHNNY	07/29/99	20.00	MO	83717774122 003054	B1	S WEBB
00626256	WEBB	JOHNNY	07/30/99	100.00	MO	84002600305 004482	B1	C PEARCE
00626256	WEBB	JOHNNY	08/02/99	10.15	CM	J409IS	B4	0802991240449296068
00626256	WEBB	JOHNNY	08/04/99	17.20	CM	J409IR	B4	0804991438449296068
00626256	WEBB	JOHNNY	08/05/99	2.80	CM	J409IR	B4	0805991738449296068
00626256	WEBB	JOHNNY	08/09/99	10.15	CM	J409IS	B4	0809991848449296068
00626256	WEBB	JOHNNY	08/11/99	18.70	CM	J409IR	B4	0811991919449296068
00626256	WEBB	JOHNNY	08/12/99	20.00	MO	84002610227 023283	B1	S WEBB
00626256	WEBB	JOHNNY	08/13/99	1.40	CM	J409IR	B4	0813991509449296068
00626256	WEBB	JOHNNY	08/16/99	10.15	CM	J409IS	B4	0816991319449296068
00626256	WEBB	JOHNNY	08/16/99	6.95	CM	J409IS	B4	0816991320449296068
00626256	WEBB	JOHNNY	08/18/99	19.30	CM	J409IR	B4	0818991824449296068
00626256	WEBB	JOHNNY	08/20/99	0.70	CM	J409IR	B4	0820991519449296068
00626256	WEBB	JOHNNY	08/25/99	18.20	CM	J409IR	B4	0825991010454236312
00626256	WEBB	JOHNNY	08/26/99	1.80	CM	J409IR	B4	0826991526449296068
00626256	WEBB	JOHNNY	09/01/99	18.45	CM	J409IR	B4	0901991453449296068
00626256	WEBB	JOHNNY	09/02/99	1.90	CM	J409IR	B4	0902990915464236312
00626256	WEBB	JOHNNY	09/03/99	4.60	CM	J409IR	B4	0903991445449296068
00626256	WEBB	JOHNNY	09/08/99	25.20	CM	J409IR	B4	0908991808449296068
00626256	WEBB	JOHNNY	09/08/99	25.00	CM	J409IS	B4	0908991811449296068
00626256	WEBB	JOHNNY	09/08/99	0.00	CO	J409IN	I	0908991811449296068

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TDCNO.	NAME	DATE	AMOUNT	LOC.	TRANSACTION	REPORT	TYPE	SENDEE	
00626256	WEBB	JOHNNY	09/14/99	3.40	CM	J4091R	B4	0914991104464236312	
00626256	WEBB	JOHNNY	09/27/99	0.00	CM	BY411R	B4	0925991410460764374	
00626256	WEBB	JOHNNY	10/04/99	0.00	CM	BY221R	B4	1002990954454316523	
00626256	WEBB	JOHNNY	10/04/99	20.00	MO	84005510332	005964	027706 B1 S WEBB 1	
00626256	WEBB	JOHNNY	10/21/99	16.25	CM	BY411R	B4	1021991310460764374	
00626256	WEBB	JOHNNY	10/21/99	0.00	CO	BY411R	I	1021991310460764374	
00626256	WEBB	JOHNNY	10/21/99	20.00	MO	84005523347	021131	029423 B1 S WEBB 1	
00626256	WEBB	JOHNNY	10/22/99	200.00	MO	84005523685	004096	029511 B1 C PEARCE 1	
00626256	WEBB	JOHNNY	10/29/99	67.30	CM	BY221R	B4	1029990941454316523	
00626256	WEBB	JOHNNY	11/05/99	42.65	CM	BY221R	B4	1105990925454316523	
00626256	WEBB	JOHNNY	11/15/99	99.58	CM	BY221R	B4	1115990718454316523	
00626256	WEBB	JOHNNY	11/29/99	25.00	MO	84005543261	000052	033308 B1 S WEBB 1	
00626256	WEBB	JOHNNY	12/02/99	39.25	CM	BY411R	B4	1202991530460764374	
00626256	WEBB	JOHNNY	12/02/99	0.00	CO	BY411R	I	1202991530460764374	
00626256	WEBB	JOHNNY	12/08/99	25.00	MO	84000864701	016363	034225 B1 S WEBB 1	
00626256	WEBB	JOHNNY	12/13/99	25.00	MO	83716185295	023439	034702 B1 S WEBB 1	
00626256	WEBB	JOHNNY	12/16/99	25.00	MO	01809840881	020294	035017 B1 B TUCKER 1	
00626256	WEBB	JOHNNY	12/17/99	62.42	CM	JA111R	B4	1217991342463236418	
00626256	WEBB	JOHNNY	12/20/99	30.00	MO	84000868323	017962	035417 B1 S WEBB 1	
00626256	WEBB	JOHNNY	12/22/99	42.60	CM	JA111R	B4	1222990838463236418	
00626256	WEBB	JOHNNY	12/22/99	0.00	CO	JA111R	I	1222990838463236418	
00626256	WEBB	JOHNNY	01/11/00	0.00	CM	JA091R	B4	0111001511363444074	
00626256	WEBB	JOHNNY	01/27/00	0.00	CM	JA111R	B4	0127000852463236418	
00626256	WEBB	JOHNNY	02/08/00	100.00	MO	84489564644	000419	003902 B1 C PEARCE 1	
00626256	WEBB	JOHNNY	02/15/00	74.85	CM	JA241R	B4	0215001452464573606	
00626256	WEBB	JOHNNY	02/22/00	22.45	CM	JA241R	B4	0222000806464573606	
00626256	WEBB	JOHNNY	02/22/00	0.00	CO	JA241R	I	0222000806464573606	
00626256	WEBB	JOHNNY	03/01/00	20.00	MO	84487253332	009984	006119 B1 S WEBB 1	
00626256	WEBB	JOHNNY	03/02/00	0.00	CO	JA241R	I	0302000839450357750	
00626256	WEBB	JOHNNY	03/02/00	20.30	CM	JA241R	B4	0302000839450357750	
00626256	WEBB	JOHNNY	03/23/00	20.00	MO	84938618542	000655	008330 B1 S WEBB 1	
00626256	WEBB	JOHNNY	04/03/00	18.65	CM	JA091R	B4	0403001418442764038	
00626256	WEBB	JOHNNY	04/03/00	0.00	CO	JA091R	I	0403001418442764038	
00626256	WEBB	JOHNNY	04/11/00	20.00	MO	84938626563	009088	010207 B1 S WEBB 1	
00626256	WEBB	JOHNNY	04/17/00	23.00	CM	JA111R	B4	0417000809442764038	
00626256	WEBB	JOHNNY	04/17/00	0.00	CO	JA111R	I	0417000809442764038	
00626256	WEBB	JOHNNY	04/19/00	100.00	MO	84938642976	000035	011003 B1 C PEARCE 1	
00626256	WEBB	JOHNNY	04/26/00	74.92	CM	JA091R	B4	0426001050456963892	
00626256	WEBB	JOHNNY	05/09/00	5.75	CM	JA111R	B4	0509001043442764038	
00626256	WEBB	JOHNNY	05/11/00	20.00	CM	JA111R	B4	0511001350442764038	
00626256	WEBB	JOHNNY	05/11/00	0.00	CO	JA111R	I	0511001350442764038	
00626256	WEBB	JOHNNY	05/16/00	0.00	CM	JA111R	B4	0516000829442764038	
00626256	WEBB	JOHNNY	05/26/00	0.00	CM	JA111R	B4	0526001058456963892	
00626256	WEBB	JOHNNY	05/31/00	20.00	MO	85509768622	022537	015213 B1 S WEBB 1	
00626256	WEBB	JOHNNY	06/02/00	19.90	CM	JA091R	B4	0602000832456963892	
00626256	WEBB	JOHNNY	06/02/00	0.00	CO	JA091R	I	0602000832456963892	
00626256	WEBB	JOHNNY	06/12/00	0.00	CM	JA111R	B4	0612001503456963892	
00626256	WEBB	JOHNNY	06/21/00	0.00	CM	JA111R	B4	0621002008363444074	
00626256	WEBB	JOHNNY	06/27/00	0.00	CM	JA091R	B4	0627000821456963892	

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TDICNO.	NAME	DATE	AMOUNT	LOG.	TRANSACTION	REPORT	TYPE	SENDEE
00626256	WEBB	JOHNNY	07/05/00	20.00	MO 85509769421	014217	018724	B1 S WEBB
00626256	WEBB	JOHNNY	07/06/00	100.00	MO 85510088998	001848	018825	B1 C PEARCE
00626256	WEBB	JOHNNY	07/07/00	73.87	CM		JA091R	B4 0707001013456963892
00626256	WEBB	JOHNNY	07/14/00	1.10	CM		JA111R	B4 0714000813442764038
00626256	WEBB	JOHNNY	07/19/00	43.87	CM		JA111R	B4 0719000844442764038
00626256	WEBB	JOHNNY	07/19/00	0.00	CO		JA111R	B4 0719000844442764038
00626256	WEBB	JOHNNY	07/24/00	1.30	CM		JA111R	B4 0724000943442764038
00626256	WEBB	JOHNNY	08/03/00	0.00	CM		JA091R	B4 0803001107456963892
00626256	WEBB	JOHNNY	08/03/00	20.00	MO 85512314417	013522	021611	B1 S WEBB
00626256	WEBB	JOHNNY	08/14/00	130.00	MO 85512315598	013746	022703	B1 WEBB
00626256	WEBB	JOHNNY	08/23/00	73.02	CM		JA111R	B4 0823001405456963892
00626256	WEBB	JOHNNY	08/29/00	3.00	JA MC 000300 000000CMC4587 TT		JAMA	B4 0827000340000000000
00626256	WEBB	JOHNNY	09/05/00	52.96	CM		JA111R	B4 0905001359442764038
00626256	WEBB	JOHNNY	09/11/00	0.00	CO		JA111R	B4 0911001653363444074
00626256	WEBB	JOHNNY	09/11/00	20.15	CM		JA111R	B4 0911001653363444074
00626256	WEBB	JOHNNY	09/13/00	3.00	JA MA 000300 000000DC00137 TT		JAMA	B1 0827000340000000000
00626256	WEBB	JOHNNY	09/13/00	0.80	CM		JA111R	B4 0913001556363444074
00626256	WEBB	JOHNNY	09/18/00	2.55	CM		JA111R	B4 0918000811442764038
00626256	WEBB	JOHNNY	09/21/00	0.40	OP TTUWSC-CHC		519908	B4
00626256	WEBB	JOHNNY	10/18/00	0.00	CM		JA261R	B4 1018001250466551978
00626256	WEBB	JOHNNY	10/24/00	100.00	MO 02486460870	003307	029830	B1 S WEBB
00626256	WEBB	JOHNNY	10/30/00	59.00	CM		HV071R	B4 1030000728449508078
00626256	WEBB	JOHNNY	01/30/01	2.72	DU AB 000272 000000 POSTAGE		DU44	B4 0101300925460331896
00626256	WEBB	JOHNNY	02/06/01	0.44	DU CA DIAG MISC		320701	B1 DIAGNOSTIC UNIT
00626256	WEBB	JOHNNY	02/06/01	0.00	DU CP COMMISSARY PURCHASE		000001	B4
00626256	WEBB	JOHNNY	02/09/01	30.00	MO 02544991053	011769	004026	B1 S BB
00626256	WEBB	JOHNNY	02/12/01	10.00	MO 02588859191	016832	004334	B1 TUCKER
00626256	WEBB	JOHNNY	03/23/01	57.23	CM		JAB21R	B4 0323010858463236418
00626256	WEBB	JOHNNY	04/06/01	0.00	CO		JAB21R	B4 0406010919464334530
00626256	WEBB	JOHNNY	04/06/01	21.38	CM		JAB21R	B4 0406010919464334530
00626256	WEBB	JOHNNY	04/23/01	0.00	CM		JAB21R	B4 0423010957464334530
00626256	WEBB	JOHNNY	04/24/01	0.34	JA AB 000027 000007 POSTAGE		JA14	B4 0104241151301441597
00626256	WEBB	JOHNNY	04/26/01	0.34	JA AB 000000 000034 POSTAGE		JA64	B4 0104261105459770205
00626256	WEBB	JOHNNY	05/02/01	30.00	MO 03131756875	003195	012208	B1 S WEBB
00626256	WEBB	JOHNNY	05/02/01	0.41	JA PP 000041 000000		012208	B4
00626256	WEBB	JOHNNY	05/09/01	16.03	CM		JAB21R	B4 0509010852463236418
00626256	WEBB	JOHNNY	05/14/01	200.00	MO 02997094915	000782	013406	B1 C PEARCE
00626256	WEBB	JOHNNY	05/23/01	0.90	CM		JAB21R	B4 0523010953464334530
00626256	WEBB	JOHNNY	06/06/01	58.25	CM		JAB21R	B4 0606010948463236418
00626256	WEBB	JOHNNY	06/07/01	30.00	MO 03131781491	002212	015812	B1 S WEBB
00626256	WEBB	JOHNNY	06/26/01	62.38	CM		JAB21R	B4 0626010805463236418
00626256	WEBB	JOHNNY	07/10/01	56.86	CM		JAB21R	B4 0710010831463236418
00626256	WEBB	JOHNNY	07/23/01	53.20	CM		JAB21R	B4 0723010808463236418
00626256	WEBB	JOHNNY	08/09/01	11.83	CM		JAB21R	B4 0809010945464334530
00626256	WEBB	JOHNNY	08/09/01	0.00	CO		JAB21R	B4 0809010945464334530
00626256	WEBB	JOHNNY	08/09/01	30.00	MO 03220745534	002378	022125	B1 J WEBB
00626256	WEBB	JOHNNY	09/06/01	24.00	MO 03278878795	000534	024901	B1 B DOXEX
00626256	WEBB	JOHNNY	09/11/01	31.23	CM		JAB21R	B4 0911010957464334530
00626256	WEBB	JOHNNY	09/12/01	30.00	MO 0	000706	025529	B1 A LAYTONXJAMES



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TDGNO.	NAME	DATE	AMOUNT	LOC.	TRANSACTION	REPORT	TYPE	SENDEE			
00626256	WEBB	JOHNNY	09/24/01	100.00	MO	03572182877	007461	026720	B1	S WEBB	1
00626256	WEBB	JOHNNY	09/26/01	59.72	CM			JAB21R	B4	0926010829464334530	
00626256	WEBB	JOHNNY	10/10/01	58.75	CM			JAB21R	B4	1010010741464334530	
00626256	WEBB	JOHNNY	10/24/01	0.00	CO			JAB21R	I	1024011103466551978	
00626256	WEBB	JOHNNY	10/24/01	33.30	CM			JAB21R	B4	1024011103466551978	
00626256	WEBB	JOHNNY	11/08/01	0.34	JA	AB 000034 000000	POSTAGE	JA14	B4	011081014301441597	
00626256	WEBB	JOHNNY	11/26/01	0.70	CM			JAB21R	B4	1126010944464334530	
00626256	WEBB	JOHNNY	11/27/01	200.00	MO	03573598735	001166	033118	B1	C PEARCE	1
00626256	WEBB	JOHNNY	11/27/01	9.85	MO	0100 0029424	004172	033127	B1	E HAMILTON	1
00626256	WEBB	JOHNNY	12/03/01	100.00	MO	03573585101	012760	033740	B1	S XEXX	1
00626256	WEBB	JOHNNY	12/13/01	58.65	CM			JAB21R	B4	1213011006466551978	
00626256	WEBB	JOHNNY	12/19/01	20.00	MO	03651606720	001846	035305	B1	B TUCKER	1
00626256	WEBB	JOHNNY	01/07/02	70.05	CM			JAB21R	B4	0107021013466551978	
00626256	WEBB	JOHNNY	01/23/02	49.45	CM			JAB21R	B4	0125021043466551978	
00626256	WEBB	JOHNNY	02/08/02	52.95	CM			JAB21R	B4	0208020844466551978	
00626256	WEBB	JOHNNY	02/14/02	20.00	MO	03938189343	001828	004506	B1	S WEBB	1
00626256	WEBB	JOHNNY	02/27/02	48.31	CM			JAB21R	B4	0227020912466551978	
00626256	WEBB	JOHNNY	03/13/02	27.45	CM			JAB21R	B4	0313020747466551978	
00626256	WEBB	JOHNNY	03/26/02	200.00	MO	03942881908	007738	008526	B1	X PEARCE	1
00626256	WEBB	JOHNNY	04/02/02	54.59	CM			JAB21R	B4	0402020951466551978	
00626256	WEBB	JOHNNY	04/16/02	100.00	MO	03942894150	001655	010606	B1	S WEBB	1
00626256	WEBB	JOHNNY	05/08/02	80.85	CM			JAB21R	B4	0508020942466551978	
00626256	WEBB	JOHNNY	05/22/02	57.63	CM			JAB21R	B4	0522020659450357750	
00626256	WEBB	JOHNNY	06/10/02	58.21	CM			JAB21R	B4	0610020807466551978	
00626256	WEBB	JOHNNY	07/05/02	55.62	CM			JAB21R	B4	0705021118466551978	
00626256	WEBB	JOHNNY	07/16/02	30.00	MO	04257638302	000230	019703	B1	S WEBB	1
00626256	WEBB	JOHNNY	07/22/02	51.57	CM			JAB21R	B4	0722021035450357750	
00626256	WEBB	JOHNNY	08/01/02	14.33	CM			JAB21R	B4	0801021239450357750	
00626256	WEBB	JOHNNY	08/01/02	0.00	CO			JAB21R	I	0801021239450357750	
00626256	WEBB	JOHNNY	08/15/02	0.00	CM			JAB21R	B4	0815021214450357750	
00626256	WEBB	JOHNNY	08/15/02	70.00	MO	02544998973	004204	022712	B1	S WEBB	1
00626256	WEBB	JOHNNY	08/21/02	200.00	MO	02544999748	004604	023315	B1	C PEARCE	1
00626256	WEBB	JOHNNY	08/29/02	55.66	CM			JAB21R	B4	0829021139450357750	
00626256	WEBB	JOHNNY	09/16/02	59.65	CM			JAB21R	B4	0916021141450357750	
00626256	WEBB	JOHNNY	09/26/02	53.25	CM			JAB21R	B4	0926020742450357750	
00626256	WEBB	JOHNNY	09/26/02	0.70	CM			JAB21R	B4	0926021206466551978	
00626256	WEBB	JOHNNY	09/26/02	0.70	AC			JAB2CR	B1	0926021206466551978	
00626256	WEBB	JOHNNY	10/14/02	51.40	CM			JAB21R	B4	1014020747466551978	
00626256	WEBB	JOHNNY	10/15/02	100.00	MO	04578559806	003046	028811	B1	S WEBB	1
00626256	WEBB	JOHNNY	10/18/02	3.00	JA	MC 000300 000000MH08184	TT	JAB2	B4	1009020956000000000	
00626256	WEBB	JOHNNY	10/24/02	60.55	CM			JAB21R	B4	1024021105450357750	
00626256	WEBB	JOHNNY	10/24/02	0.80	AC			JAB2CR	B1	1024021233450357750	
00626256	WEBB	JOHNNY	11/07/02	50.75	CM			JAB21R	B4	1107020959450357750	
00626256	WEBB	JOHNNY	12/17/02	200.00	MO	04581821518	002590	035107	B1	C PEARCE	1
00626256	WEBB	JOHNNY	12/18/02	55.70	CM			JAB21R	B4	1218020617466551978	

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TDCMD. NAME

DATE AMOUNT LOC. TRANSACTION

REPORT TYPE SENDER

01705428 NO ACCOUNT ACTIVITY



# **APPENDIX 28**

Dear LAVETA,

9-25-04

Hello, Greetings and Regards.

I hope that all is going well with you and that you are in good health and spirits.

Mr. Pearce told me to write to you about my Magazine Subscriptions. The thing is that, I recently started receiving new magazine subscriptions and some of them were doubling up. Mr. Pearce didn't say he re-orders, so I think that maybe that Delta Magazine Subscription Service is automatically charging his credit card every year. That's illegal. Delta has a bad rep. about screwing people over. They are the ones I had a problem with last time. ~~Do~~ DO NOT ORDER FROM THEM.

OK. first thing you need to do is call Delta Publishing at 719-972-9900 and find out why they are re-order these magazine without permission, unless Mr. Pearce re-orders. Because he did not say.

Second, some of the Magazines I do want to keep. But some I want to cancel. I'll give you a list.

(THE ONE I  
WANT TO KEEP)  
↓

KEEP	1.	ARCHAEOLOGY	EXPIRES	J/A 2005
KEEP	2.	NATURAL HISTORY	EXPIRES	2006 or 2007
KEEP	3.	POPULAR MECHANICS	EXPIRES	OCT. 2006
KEEP	4.	ROAD + TRACK	EXPIRES	SEP 2005 - CANCEL IF REFUSE TO CORRECT.
KEEP	5.	SPORTING NEWS	EXPIRES	SEP 2007
KEEP	6.	NATIONAL GEOGRAPHIC	EXPIRES	JUN 2006
KEEP	7.	POWER + MOTOR YACHT.	EXPIRES	FEB 2007
KEEP	8.	G.Q.	EXPIRES	UNSURE

KEEP 9. CIVIL WAR TIMES <sup>EXPIRES</sup> 2006

00 8748316

02

CANCEL 10 FIELD + STREAM I have not received this magazine in the last 9 months. So JUST CANCEL IT.

All these magazines were ordered from Delta.

Could you please call Road + Track Magazine at 323-954-4838 and explain to them that we have ordered their magazine 3 times 1 once from Delta, once from Discount Magazine Service and ~~once~~ once again from Delta. However they are not showing up as the Sep 2005 expiration date shows the expiration date should at least be Sep. 2006. If they refuse to correct their mistake cancel the subscription and have them send you a refund check.

Also call Field + Stream and cancel that subscription as well tell them to send you / Mr Pearce a refund check. Field + Stream at 1-800-269-0639 call & cancel

OK the following is the list of Magazines that were ordered from Discount Magazine Subscription Service 516-681-0247. Most of which are the same and this is how some magazines subscriptions were doubled up last time. Do Not re-order any of these magazines either.

1. KEEP 1. CIVIL WAR TIMES

2. CANCEL 2. ESQUIRE

3. CANCEL 3. RODALE'S SLUBB DIVING

4. CANCEL 4. ESPN

5. KEEP 5. NATURAL HISTORY

6. KEEP 6. NATIONAL GEOGRAPHIC

7. KEEP 7. ROAD + TRACK ~~CANCEL IF REFUSE TO CORRECT~~ 9. PERC 9-2005

8. KEEP 8. SPORTING NEWS

9. KEEP 9. POWER & MOTOR YACHT

10. CANCEL 10. FIELD + STREAM

Leveta, I don't think that Account Service would reorder automatically, so it would be best just to call those magazines that I want to cancel to see if they have been reordered or maybe you can call Account Service. Either way here are the # to the magazines just in case.

1. ESQUIRE MAGAZINE 1-800-888-5400 Cancel
2. ROYAL SCUBA DIVING 1-800-666-0016 Cancel
3. ESPN - 1-888-267-3684 Cancel

If any of these have been re-ordered cancel and have a refund check sent to you / Mr. Pearce.

Ok. Last. all the ones I want to cancel or Not re-new. I want to trade for these <sup>NEW</sup> ones. But you can not use a credit card to order them. I think that's best. I have enclosed the order forms. You will have to figure out the 8.25% sales tax. I don't want to screw that up. Here is the list of New Magazines I want for the ones I am canceling or trading off. Some are pretty cheap.

1. CONDE NAST TRAVELER 12 ISSUES \$ 7.99
2. Kiplingers PERSONAL FIN. 12 ISSUES \$ 6.99
3. MAXIM 12 ISSUES \$ 6.99
4. STUFF 12 ISSUES \$ 6.99
5. ROBB REPORT 12 ISSUES \$ 21.00
6. WEEKLY WORLD NEWS 52 ISSUES \$ 21.00

Please let Mr. Pearce know he can only send a check or money order to pay for these. That way his credit card doesn't automatically get hit for charges.

24 Sept 04  
24 Aug 04

Ordered 11-1-04

My Lavato, I hope that I did not confuse you with all this. I really do appreciate your help with this. I had my mom call all the magazines and stop the Double issues I was receiving and try to fix the expiration dates of them. However Road & Track she could never get anyone. Those people have computers to check all the orders they receive so I don't see why they don't fix their mistake.

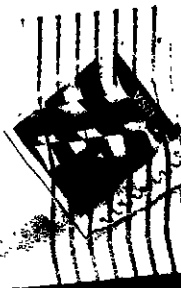
I also hope that the order forms for the new magazines don't confuse you. It really is a lot to sort out.

Once again thank you very much for your time and help with all this. I know this seems like a lot of magazines. But I sit in this cell 24/7 with nothing to do but read. Its too hard to find good books and ordering and sending into the prison is a real problem. I love to read. And to write letters but Mr. Pearce and my mom are the only people I write. So I read. Well, I close for now. I don't talked your ear off. Take care of yourself. Give Mr. Pearce my best. Awaiting your Response I shall remain.

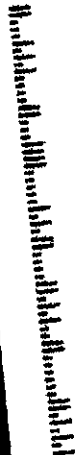
Sincerely  
Johnny Ewell

MR JOHNNY E WEBB # 626256  
2101 FM. 369 N.  
JN. ARKMO  
TOWN PARK, TX 76367

Mrs. Loueta Colone  
2201 ARKMO LN.  
CORVISON TX. 75110



751102635



# **APPENDIX 29**

## **Past Vehicles:**

**1991 CHEVROLET** - Series: **CHEYENNE~SCOTTSDALE~SILVE** - Model: **C/K1500**

VIN: **2GCEC19K9M1105640**

Body Style: **EXTENDED CAB** - Vehicle Type: **Passenger Car**

Weight: **4400** lbs - Length: **223 - 237"**

Most Current Tag #: **TX 78JBL5** Valid from: **(12/01/2007 to 11/30/2008)**

Doors: **2**

MSRP: **\$13,065**

Plant: **OSHAWA, ONTARIO, CANADA**

Restraint Type: **ACTIVE BELTS**

Gross Vehicle Weight Range: **6001-7000**

Height: **70.4**

Wheel Base: **141.5 - 155.5**

Wheel Dimensions: **15.0**

Drive Type: **RWD**

Fuel: **GAS 25 Gallon**

Engine: **5.7L V8 NATURALLY ASPIRATED**

Most Current Owner/Registrant/Lien Information - **11/01/1999 to 11/30/2008**

### **Title Holders**

**EDWARD R PRATT**

**1821 MAHALIA DR, WACO, TX 76705-2773 (MCLENNAN COUNTY)**

Title Number: **16131336724114051**

State Titled In: **TX**

Original Title Date: **07/28/2000**

Title Transfer Date: **03/23/2007**

### **Lien Holders**

**None Found**

### **Lessors**

**None Found**

### **Title Holders**

**EDWARD R PRATT**

**1821 MAHALIA DR, WACO, TX 76705-2773 (MCLENNAN COUNTY)**

Title Number: **16131336724114051**

State Titled In: **TX**

Original Title Date: **07/28/2000**

Title Transfer Date: **07/28/2000**

### **Lien Holders**

**None Found**

### **Lessors**

**None Found**



**Registrant**

**EDWARD R PRATT**

Registered: 11/01/1999 to 11/30/2008

**Addresses Registered to While owned by EDWARD R PRATT**

1821 MAHALIA DR, WACO, TX 76705-2773 (MCLENNAN COUNTY)(11/01/1999 to 12/01/2007)

**Vehicle Tag History**

License Plate: TX 78JBL5 Valid from: (12/01/2007 to 11/30/2008)

License Plate: TX 2KFH83 Valid from: (11/01/1999 to 10/31/2006)

**Previous Owner/Registrant/Lien Information - 09/04/1997 to 10/31/2000**

**Title Holders**

**JOHNNY E WEBB**

712 N 23RD ST, CORSICANA, TX 75110-3527 (NAVARRO COUNTY)

Title Number: 17500035970154700

State Titled In: TX

Original Title Date: 07/08/1998

Title Transfer Date: 07/08/1998

**Lien Holders**

**FIRST STATE BANK OF NORTH TEXAS**

PO BOX 625, CORSICANA, TX 75151-0625 (NAVARRO COUNTY)

**Lessors**

**None Found**

**Registrant**

**JOHNNY E WEBB**

Registered: 09/04/1997 to 10/31/2000

**Addresses Registered to While owned by JOHNNY E WEBB**

712 N 23RD ST, CORSICANA, TX 75110-3527 (NAVARRO COUNTY)(09/04/1997 to 11/01/1999)

**Vehicle Tag History**

License Plate: TX 2KFH83 Valid from: (11/03/1998 to 10/31/2000)

Previous License Plate: TX 7047WR

License Plate: TX 7047WR Valid from: (09/04/1997 to 08/31/1998)

**Previous Owner/Registrant/Lien Information - 09/01/1996 to 08/31/1998**

**Title Holders**

**None Found**

**Registrant**

**HAYNIE DRILLING CO. INC.**

Registered: 09/01/1996 to 08/31/1998

**Addresses Registered to While owned by HAYNIE DRILLING CO. INC.**

PO BOX 1061, CORSICANA, TX 75151-1061 (NAVARRO COUNTY)(09/01/1996 to 09/04/1997)

**Vehicle Tag History**

License Plate: **TX 7047WR** Valid from: **(09/01/1996 to 08/31/1998)**

# **APPENDIX 30**

# HARRIS COUNTY PRETRIAL SERVICES AGENCY DEFENDANT INTERVIEW

DEFENDANT NAME: WEBB, JOHNNY EVERETT

SPN: 01659694 D.A.

## CHARGE INFORMATION

CHARGE AND BOND  
PCS-CRACK PIPE 000000  
COURT AND CASE NO.  
232/0786S3501010

998

ADDITIONAL CHARGES: FELONY 00 MISDEMEANOR 00 CLASS C 00  
HOLDS N HARRIS CO. WARRANTS N FUGITIVE N

## CRIMINAL HISTORY SUMMARY

FELONY CONVICTIONS 08 MISDEMEANOR CONVICTIONS 00  
PRESENTLY ON PROBATION N PRESENTLY ON PAROLE N PREVIOUSLY FTA N

## DEFENDANT REPORTED CONVICTIONS / OPEN CASES

ARREST DT	LOCATION	CHARGE	NAME USED	DISPOSITION
1. 1998	HARRIS	PCS	SAME	OPEN CASE) RTN-0798
2.				
3.				
4.				

## PERSON IDENTIFICATION INFORMATION

TRUE NAME WEBB, JOHNNY EVERETT ADDITIONAL SPN POSSIBLE SPN

AKA / OTHER NAMES NONE PER DEF

AGE 28 SEX M RACE W MARTIAL STATUS M DOB 011570 DOB2

CITIZENSHIP Y POB TEXAS HGT 511 WGT 185 EYE GRN HAIR BRN  
SCARS / MARKS / TATOOS NONE-VIS DEFENDANT SPEAKS EN

SSN DL NO. DL STATE TX SON 891052  
FBI SID TX03940833 HPD 788872 INS NO.

## RESIDENCE INFORMATION

998

CURRENT ADDRESS 5929 BISSONETT APT NO. 0117 CITY HOU STATE TX  
ZIP 77081 COUNTY HARRIS APT NAME JOHNATHAN II APT HOME PHONE NP RETURN Y  
LENGTH HERE 005/M LIVES WITH CHAUNA DALE SLN RELATION WIFE WK PHONE NONE  
CHILDREN 04/04 AGE RANGE FROM 05/Y TO 09/M

ALTERNATE ADDRESS APT NO. CITY STATE

ZIP HOME PHONE LIVES WITH  
RELATIONSHIP WORK PHONE CAN CONTACT

PREVIOUS ADDRESS UNK APT NO. UNK CITY HOU STATE TX

ZIP TX770 HOME PHONE NP LIVED WITH SAME RELATION WIFE

STILL THERE N CAN CONTACT N LENGTH HERE 001/M

## OCCUPATIONAL INFORMATION

998

EMP FT UNEMP / SCH TRN DISABILITY NONE OTHER  
CURRENT EMPLOYER / SCHOOL THE OCEAN CORP POSITION / GRADE CML DIVER DEPT EXPLORATORY SHIFT 2  
ADDRESS 10840 ROCKLEY RD CITY HOU STATE TX ZIP TX770  
WORK PHONE UNK CONTACT AT WORK RICK MULIGAN CAN CONTACT Y LENGTH EMP 002/M  
INCOME 1600/MO SOURCE OF INCOME IF NOT EMP DEPENDANTS 06

SECOND JOB/SCHOOL NONE ADDRESS  
PREVIOUS EMPLOYER SUB-CONTRACTOR POSITION CML DIVER LENGTH EMP UNK/M INCOME UNK /MO

PREV EMP ADDRESS UNK CITY HOU STATE TX ZIP TX770 WORK PHONE UNK

VETERAN N BRANCH OF SERVICE NONE H.S. GRADUATE Y OBTAINED GED N GRADE COMPLETED 013Y  
HEALTH PROBLEM Y TYPE OF HEALTH PROBLEM SEE PTS7 ALCOHOL PROBLEM N DRUG PROBLEM N

PRINTED ON 06/27/98 AT 04:00

# HARRIS COUNTY PRETRIAL SERVICES AGENCY DEFENDANT INTERVIEW

DEFENDANT NAME: WEBB, JOHNNY EVERETT

SPN: 01659694 D.A. \_\_\_\_\_

## FINANCIAL INFORMATION

999

SPOUSES EMPLOYER N/A ADDRESS \_\_\_\_\_ CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

SPOUSES INCOME \_\_\_\_\_ CASH ON HAND 7.00 OTHER PROP OWNED NONE

BANK NAME NONE AMT CHECKING 00 AMT SAVINGS 00

RESIDENCE STATUS R NAME ON LEASE DEF

OTHER INCOME SOURCE CHAS. PIERCE INCOME 1000 MO SOURCE \_\_\_\_\_ INCOME \_\_\_\_\_  
SOURCE \_\_\_\_\_ INCOME \_\_\_\_\_ SOURCE \_\_\_\_\_ INCOME \_\_\_\_\_

MOTOR VEHICLE 1	Y	MAKE/MODEL <u>91 CHEV P/U</u>	VALUE <u>10000</u>	OWES <u>00</u>
MOTOR VEHICLE 2		MAKE/MODEL _____	VALUE _____	OWES _____

MONTHLY EXPENSES MORT/RENT 325 UTIL 60 FOOD 300 MEDICAL 00  
CHILD CARE 00 INS 35 AUTO 150 CREDITORS 00  
COURT ORDERED 00 OTHER 00

## REFERENCES

999

CONTACTED ANYONE SINCE ARREST Y WHO PARENTS PHONE NUMBER 903 8746348  
ATTORNEY'S NAME NONE ATTORNEY'S PHONE NUMBER \_\_\_\_\_

NEXT OF KIN NPD RELATION \_\_\_\_\_ KNOWN DEF \_\_\_\_\_ ADDRESS \_\_\_\_\_  
HOME PH \_\_\_\_\_ WK PH \_\_\_\_\_ CONTACT \_\_\_\_\_ VERIFIER \_\_\_\_\_ DATE/TIME \_\_\_\_\_

VERIFIED : ADDRESS 1 2 3 4 5 COMMENTS \_\_\_\_\_

REFERENCE CHARLES PIERCE RELATION RD KNOWN DEF LIT ADDRESS 1201 GOVERNORS RD  
HOME PH 903 8748525 WK PH NONE CONTACT Y VERIFIER \_\_\_\_\_ DATE/TIME \_\_\_\_\_

VERIFIED : ADDRESS 1 2 3 4 5 COMMENTS \_\_\_\_\_

REFERENCE NPD RELATION \_\_\_\_\_ KNOWN DEF \_\_\_\_\_ ADDRESS \_\_\_\_\_

HOME PH \_\_\_\_\_ WK PH \_\_\_\_\_ CONTACT \_\_\_\_\_ VERIFIER \_\_\_\_\_ DATE/TIME \_\_\_\_\_

VERIFIED : ADDRESS 1 2 3 4 5 COMMENTS \_\_\_\_\_

## COMMENTS

999

DEF HAS NO OTHER REFERENCES  
DEF STATED THAT HE WAS NOT ON PAROLE  
TX DL 09479271  
BOND RAISED TO \$15000 IN PCH ON 050598

## BAIL CLASSIFICATION SCALE

VARIABLE	SCORING	POINTS
1. AUTO	Add 1 point if the defendant has an automobile	(+) 1
2. TELEPHONE	Add 1 point if the defendant has a phone in his / her residence	(+) 0
3. FULL TIME EMPLOYMENT OR SCHOOL, OR HOMEMAKER	Add 1 point if defendant is either employed or attending school full time, or if defendant is a full time homemaker	(+) 1
4. NUCLEAR FAMILY	Add 1 point if defendant lives alone or with his / her spouse and or children	(+) 1
5. UNDER 21 YEARS OLD	Subtract 1 point if the defendant is under 21 years old	(-) 0
6. PRIOR FAILURES TO APPEAR	Subtract 1 point if defendant has one or more verified fta's	(-) 0
7. PRIOR MISDEMEANORS	Subtract 1 point if defendant has 2 or more prior misdemeanor convictions	(-) 0
8. PRIOR FELONIES	Subtract 2 points if the defendant has 2 or more prior felony convictions	(-) 2
TOTAL	RANGE +4 TO -5	+01

## INTERVIEW PARTICULARS

999

INTERVIEWER 00607463 DM SHIFT 2 DATE/TIME 050598/0705 LOCATION HCI DATE OF ARREST 050498

JMS CHECKS MD TCIC HIST ATT TCIC WANTS CLR NCIC HIST ATT NCIC WANTS CLR

HPD RAP \_\_\_\_\_ SO ID CLR CRSS CROSS \_\_\_\_\_ OTHER \_\_\_\_\_

## JUDICIAL DECISION

DENIED \_\_\_\_\_

APPROVED \_\_\_\_\_

DATE \_\_\_\_\_

DATE \_\_\_\_\_

**HCDistrictclerk.com**The State of Texas vs. WEBB, JOHNNY E. (SPN:  
01659694)

3/7/2014

Cause: 078207101010 CDI: 3 Court: 232

**APPEALS**

No Appeals found.

**PAYMENT PLAN**

No Payment Plan found.

**RELATED CASES**

No related cases found.

**WITNESS**

No Witness found.

**SUMMARY****CASE DETAILS**

File Date	5/4/1998
Case (Cause) Status	Complete
Offense	POSS CS PG 1 <1G
Last Instrument Filed	Felony Indictment
Case Disposition	DISP-080598
Case Completion Date	8/5/1998
Defendant Status	DISPOSED
Bond Amount	\$15,000.00
Next/Last Setting Date	8/5/1998

**DEFENDANT DETAILS**

Race/Sex	W / M	Height/Weight	5'11 / 189 LBS
Eyes	GRN	Hair	BRO
Skin	FAR	Build	MED
DOB	1/15/1970	In Custody	N
US Citizen	YES	Place Of Birth	TX
Address	5929 BISSONNET HOUSTON TX77081		
Markings			

**COURT DETAILS**

Court	232 <sup>nd</sup>
Address	1201 Franklin (Floor: 16) Houston, TX 77002 Phone:7137556778
JudgeName	Mary Lou Keel
Court Type	Criminal

**BONDS**

Date	Type	Description	SNU
05/04/1998	BOND SET	\$10000	999
05/24/1998	BOND FILED	CRT 232 TIME 1948 TYPE SURETY	
05/24/1998	BOND MADE	AMT \$15000 DATE 05/23/98 RCPT #	
05/24/1998	BONDSMAN	IFIC-ROMEO, CLEMENT H.	

**ACTIVITIES**

Date	Type	Description	SNU/CFI
05/04/1998	COMPLAINT FILED	2149 232 POSS CS PG 1 <1G LEVEL FS	

05/04/1998	BOND SET	\$10000	999
05/04/1998		REVIEWED BY	
05/04/1998	ORI	HOUSTON POLICE DEPAR OFFENSE NO: 55772998	
05/04/1998	COMPLAINANT	YOUNG, MICHAEL	
05/05/1998	CMIF	TIME 0925 AMOUNT \$15000	999
05/05/1998		NOT ACKNOWLEDGED BY SHERIFF	
05/24/1998	BOND FILED	CRT 232 TIME 1948 TYPE SURETY	
05/24/1998	BOND MADE	AMT \$15000 DATE 05/23/98 RCPT #	
05/24/1998	BONDSMAN	IFIC-ROMEEO, CLEMENT H.	
06/05/1998	GRAND JURY ACTION	FID 06/05/98 G338	999
06/05/1998	GRAND JURY ACTION	ROTATION CRT 232 OFF FREQ T BND \$15000	
06/05/1998	GRAND JURY ACTION	OFFENSE POSS CS PG 1 <1G LEVEL FS	
06/05/1998	ORI	HOUSTON POLICE DEPAR OFFENSE NO: 55772998	
05/05/1998	C87 ACTIVITY	BOND RSD STATUS CFI 232	998
05/05/1998	C87 ACTIVITY	PC FOUND STATUS CFI 232	999
05/05/1998	C87 ACTIVITY	PROBABLE CAUSE FOUND	
08/05/1998	DRUG EDUCATION REQUIRED	SNU: 999	
08/05/1998	SENTENCED IN	COURT 232 STARTING 08/05/98	999
08/05/1998	SENTENCE TO	2 YEARS CONFINEMENT	
08/05/1998	CREDIT GIVEN	DEFENDANT RECEIVED 62 DAYS CREDIT	
08/05/1998	DELIVERY ORDER	RETURNED EXECUTED 09/30/98	999
08/05/1998	JUDGMENT	CONVICTION	999
08/05/1998	JUDGMENT	GUILTY PLEA-NO JURY	
08/05/1998	JUDG OFFENSE	POSS CS PG 1 <1G LEVEL FS	
08/05/1998	PENALTY	TDC AMOUNT 2 YEARS	

**BOOKINGS**

Arrest Date	Arrest Location	Booking Date
8/5/1998 6:29:00 PM	JA00	8/5/1998 6:29:00 PM
5/4/1998 3:35:00 PM	HCTY	5/5/1998 3:39:00 AM

**HOLDS**

Agency Placing Hold	Agency Name	Warrant Number	Bond Amount	Offense	Hold Placed	Hold Lifted
TDC	TDC	784597	\$0.00	BENCH WARRANT	4/15/1999	6/10/1999

**CRIMINAL HISTORY**

Case(Cause)Nbr / Status	Defendant	Filed / Booked	Ct	Defendant Status	Disposition	Bond Amt	Type of Action / Offense	Next Setting
<u>078653501010-</u> <u>3Complete(C)</u>	WEBB, JOHNNY EVERETT	6/26/1998   6/26/1998	232	Disposed(D)	Disposed (DISP) 8/5/1998		POSS CS PG 1 <1G (F)	8/5/1998
<u>078207101010-</u> <u>3Complete(C)</u>	WEBB, JOHNNY E.	5/4/1998   8/5/1998	232	Disposed(D)	Disposed (DISP) 8/5/1998	\$15,000.00	POSS CS PG 1 <1G (F)	8/5/1998

**ACTIVE PARTIES**

Name	Connection	Post Jdgm	SPN #
IFIC-ROMEO, CLEMENT H.	BAIL BONDSMAN		74304000
PORTO, JOSEPH	HIRED DEFENSE ATTORNEY		66163010
KEEL, MARY LOU	JUDGE - CRIMINAL		61156400
WEBB, JOHNNY E.	DEFENDANT - CRIMINAL		01659694

**INACTIVE PARTIES**

No inactive parties found.

**SETTINGS**

Date	Court Post Jdgm	Post Docket Type	Reason	Results	Defendant	Future Date	Comments	Attorney Appearance Indicator
5/06/1998 09:00 AM	232	Assigned Court	Preliminary Assigned Court Appearance	Reset By Operation Of Law	Data Unavailable	5/20/1998 12:00:00 AM		Absent
5/20/1998 09:00 AM	232	Master Docket	Arraignment	Reset By Operation Of Law	Data Unavailable	6/11/1998 12:00:00 AM		Present
6/12/1998 09:00 AM	232	Master Docket	Arraignment	Reset Upon Defense Request	Data Unavailable	7/7/1998 12:00:00 AM		Present
7/07/1998 09:00 AM	232	Master Docket	Disposition	Reset Upon Defense Request	Data Unavailable	8/5/1998 12:00:00 AM		Present
8/05/1998 09:00 AM	232	Master Docket	Disposition	Plea Guilty And Sentenced	Data Unavailable	1/1/0001 12:00:00 AM		Present

**ALIASES**

Defendant Alias	True Name	Race	Sex	DOB	SPN#
WEBB, JOHNNY E.		W	M	1/15/1970	01659694
WEBB, JOHNNY EVERETT	Yes	W	M	1/15/1970	01659694

**DOCUMENTS**

Number	Document	Post Jdgm	Date	Pgs
41832872	JUDGMENT-		08/05/1998	2
41832871	CHARGING INSTRUMENT - FELONY INDICTMENT		06/08/1998	2
41832873	CHARGING INSTRUMENT - FELONY INDICTMENT		06/05/1998	1
41832874	CHARGING INSTRUMENT - COMPLAINT		05/04/1998	1
41832876	CASE FILE DOCUMENTS			20



THE STATE OF TEXAS  
VS.

JOHNNY E. WEBB  
7200 HILLCROFT  
HOUSTON, TX

SPN: 01659694  
DOB: WM 10 15 70  
DATE PREPARED: 6/4/98

D.A. LOG NUMBER: 431728  
CJIS TRACKING NO.: 9029500719-A001  
BY: mkh DA NO: 668  
AGENCY: HPD  
SR NO: 55772998  
ARREST DATE: 5 4 98

NCIC CODE: 5599 04

RELATED  
CASES:

FELONY CHARGE: POSSESSION OF A CONTROLLED SUBSTANCE  
CAUSE NO: 782071  
HARRIS COUNTY DISTRICT COURT NO: 232  
FIRST SETTING DATE:

BAIL: \$10,000.00  
PRIOR CAUSE NO:

**WAIVER OF CONSTITUTIONAL RIGHTS, AGREEMENT TO STIPULATE, AND JUDICIAL CONFESSION**

In open court and prior to entering my plea, I waive the right of trial by jury. I also waive the appearance, confrontation, and cross-examination of witnesses, and my right against self-incrimination. The charges against me allege that in Harris County, Texas, JOHNNY E. WEBB, hereafter styled the Defendant, on or about MAY 4, 1998, did then and there unlawfully, intentionally and knowingly possess a controlled substance, namely, Cocaine, weighing less than 1 gram by aggregate weight, including any adulterants and diluents.

Before the commission of the offense alleged above, (hereafter styled the primary offense), on August 7, 1990, in Cause No. 385546D, in the 297th District Court of Tarrant County, Texas, the Defendant was convicted of the felony of unauthorized use of a motor vehicle.

Before the commission of the primary offense, and after the conviction in Cause No. 385546D was final, the Defendant committed the felony of forgery and was finally convicted of that offense on March 10, 1992, in Cause No. 24471-CR, in the 13 District Court of Navarro County, Texas.

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

**FILED**  
CHARLES BACARISSE  
District Clerk

AUG 05 1998

Time: 1015A  
Harris County, Texas

By: Deputy

I understand the above allegations and I confess that they are true and that the acts alleged above were committed on

9/4/98

In open court I consent to the oral and written stipulation of evidence in this case and to the introduction of affidavits, written statements, of witnesses, and other documentary evidence. I am satisfied that the attorney representing me today in court has properly represented me and I have fully discussed this case with him.

I intend to enter a plea of guilty and the prosecutor will recommend that my punishment should be set at

2 years confinement  
DCS-ID

and I agree to that recommendation. I waive any further time to prepare for trial to which I or my attorney may be entitled.

John G. Wald  
DEFENDANT

Sworn to and Subscribed before me on

AUG 05 1998

HARRIS COUNTY DEPUTY DISTRICT CLERK

I represent the defendant in this case and I believe that this document was executed by him knowingly and voluntarily and after I fully discussed it and its consequences with him. I believe that he is competent to stand trial. I agree to the prosecutors recommendation as to punishment. I waive any further time to prepare for trial to which I or the defendant may be entitled.

JOE PORTO  
DEFENDANT'S ATTORNEY (PRINT)

JOE PORTO  
SIGNATURE OF DEFENDANT'S ATTORNEY

I consent to and approve the above waiver of trial by jury and stipulation of evidence

Alme  
ASSISTANT DISTRICT ATTORNEY  
OF HARRIS COUNTY, TEXAS

This document was executed by the defendant, his attorney, and the attorney representing the State, and then filed with the papers of the case. The defendant then came before me and I approved the above and the defendant entered a plea of guilty. After I admonished the defendant of the consequences of his plea, I ascertained that he entered it knowingly and voluntarily after discussing the case with his attorney. It appears that the defendant is mentally competent and the plea is free and voluntary. I find that the defendant's attorney is competent and has effectively represented the defendant in this case. I informed the defendant that I would not exceed the agreed recommendation as to punishment.

JUDGE PRESIDING

PLEA OF GUILTY

HCDistrictclerk.com

The State of Texas vs. WEBB, JOHNNY EVERETT (SPN:  
01659694)

3/7/2014

Cause: 078653501010 CDI: 3 Court: 232

**APPEALS**

No Appeals found.

**PAYMENT PLAN**

No Payment Plan found.

**RELATED CASES**

No related cases found.

**WITNESS**

No Witness found.

**SUMMARY****CASE DETAILS**

File Date	6/26/1998
Case (Cause) Status	Complete
Offense	POSS CS PG 1 <1G
Last Instrument Filed	Felony Indictment
Case Disposition	DISP-080598
Case Completion Date	8/5/1998
Defendant Status	DISPOSED
Bond Amount	\$0.00
Next/Last Setting Date	8/5/1998

**DEFENDANT DETAILS**

Race/Sex	W / M	Height/Weight	5'11 / 189 LBS
Eyes	GRN	Hair	BRO
Skin	FAR	Build	MED
DOB	1/15/1970	In Custody	N
US Citizen	YES	Place Of Birth	TX
Address	5929 BISSONNET HOUSTON TX 77081		
Markings			

**COURT DETAILS**

Court	232 <sup>nd</sup>
Address	1201 Franklin (Floor: 16) Houston, TX 77002 Phone: 7137556778
JudgeName	Mary Lou Keel
Court Type	Criminal

**BONDS**

Date	Type	Description	SNU
06/26/1998	BOND SET	\$0	999

**ACTIVITIES**

Date	Type	Description	SNU/CFI
06/26/1998	COMPLAINT FILED	0403 232 POSS CS PG 1 <1G LEVEL FS	
06/26/1998	BOND SET	\$0	999
06/26/1998		REVIEWED BY	
06/26/1998	ORI	HOUSTON POLICE DEPAR OFFENSE NO: 080303398 R	

06/26/1998	COMPLAINANT	PERKINS, D R	
06/26/1998	CMIF	TIME 1600 AMOUNT \$0	999
06/26/1998		NOT ACKNOWLEDGED BY SHERIFF	
07/15/1998	GRAND JURY ACTION	FID 07/15/98 G339	999
07/15/1998	GRAND JURY ACTION	ROTATION CRT 232 OFF FREQ T BND \$0	
07/15/1998	GRAND JURY ACTION	OFFENSE POSS CS PG 1 <1G LEVEL FS	
07/15/1998	ORI	HOUSTON POLICE DEPAR OFFENSE NO: 80303398 R	
06/26/1998	C87 ACTIVITY	PC FOUND STATUS CFI 232	999
06/26/1998	C87 ACTIVITY	PROBABLE CAUSE FOUND	
08/05/1998	DRUG EDUCATION REQUIRED	SNU: 999	
08/05/1998	SENTENCED IN	COURT 232 STARTING 08/05/98	999
08/05/1998	SENTENCE TO	2 YEARS CONFINEMENT	
08/05/1998	CREDIT GIVEN	DEFENDANT RECEIVED 42 DAYS CREDIT	
08/05/1998	DELIVERY ORDER	RETURNED EXECUTED 09/30/98	999
07/15/1998	PRECEPT/SERVE IND DATE RETURNED 07/18/98	HOW EXECUTED E	
	DATE SERVED	07/17/98	
08/05/1998	JUDGMENT	CONVICTION	999
08/05/1998	JUDGMENT	GUILTY PLEA-NO JURY	
08/05/1998	JUDG OFFENSE	POSS CS PG 1 <1G LEVEL FS	
08/05/1998	PENALTY	TDC AMOUNT 2 YEARS	

**BOOKINGS**

Arrest Date	Arrest Location	Booking Date
6/25/1998 8:00:00 PM	HOUS	6/26/1998 11:45:00 AM

**HOLDS**

Agency Placing Hold	Agency Name	Warrant Number	Bond Amount	Offense	Hold Placed	Hold Lifted
TDC	TDC	784597	\$0.00	BENCH WARRANT	4/15/1999	6/10/1999

**CRIMINAL HISTORY**

Case(Cause)Nbr / Status	Defendant	Filed / Booked	Ct	Defendant Status	Disposition	Bond Amt	Type of Action / Offense	Next Setting
<u>078653501010-3</u> <u>Complete(C)</u>	WEBB, JOHNNY EVERETT	6/26/1998   6/26/1998	232	Disposed(D)	Disposed (DISP) 8/5/1998		POSS CS PG 1 <1G (F)	8/5/1998
<u>078207101010-3</u> <u>Complete(C)</u>	WEBB, JOHNNY E.	5/4/1998   8/5/1998	232	Disposed(D)	Disposed (DISP) 8/5/1998	\$15,000.00	POSS CS PG 1 <1G (F)	8/5/1998

**ACTIVE PARTIES**

Name	Connection	Post Jdgm	SPN #
KEEL, MARY LOU	JUDGE - CRIMINAL		61156400

PORTO, JOSEPH	HIRED DEFENSE ATTORNEY	66163010
WEBB, JOHNNY EVERETT	DEFENDANT - CRIMINAL	01659694

**INACTIVE PARTIES**

No inactive parties found.

**SETTINGS**

Date	Court Post Jdgm Type	Docket	Reason	Results	Defendant	Future Date	Comments	Attorney Appearance Indicator
6/29/1998 09:00 AM	232	Assigned Court	Preliminary Assigned Court Appearance	Reset By Operation Of Law	Data Unavailable	7/7/1998 12:00:00 AM		Present
7/07/1998 09:00 AM	232	Master Docket	Arraignment	Reset By Operation Of Law	Data Unavailable	8/5/1998 12:00:00 AM		Present
8/05/1998 09:00 AM	232	Master Docket	Arraignment	Plea Guilty And Sentenced	Data Unavailable	1/1/0001 12:00:00 AM		Present

**ALIASES**

Defendant Alias	True Name	Race	Sex	DOB	SPN#
WEBB, JOHNNY E.		W	M	1/15/1970	01659694
WEBB, JOHNNY EVERETT	Yes	W	M	1/15/1970	01659694

**DOCUMENTS**

Number	Document	Post Jdgm	Date	Pgs
41600224	JUDGMENT-		08/05/1998	2
41600221	CHARGING INSTRUMENT - FELONY INDICTMENT		07/15/1998	1
41600225	CHARGING INSTRUMENT - COMPLAINT		06/26/1998	1
41600229	CASE FILE DOCUMENTS			16

THE STATE OF TEXAS  
VS.

JOHNNY EVERETT WEBB  
5929 BISSONNET #119  
HOUSTON, TX 7081

SPN: 01659694  
DOB: WM 1 15 70  
DATE PREPARED: 7/14/98

D.A. LOG NUMBER: 443241  
CJIS TRACKING NO.: 9029617152-A001  
BY: mkb DA NO: 720  
AGENCY: HPD  
GR NO: 80303398-R  
ARREST DATE: 6 25 98

NCIC CODE: 5599 04

RELATED  
CASES:

FELONY CHARGE: POSSESSION OF A CONTROLLED SUBSTANCE  
CAUSE NO: 786535  
HARRIS COUNTY DISTRICT COURT NO: 232  
FIRST SETTING DATE:

BAIL: \$NO BOND  
PRIOR CAUSE NO:

**WAIVER OF CONSTITUTIONAL RIGHTS, AGREEMENT TO STIPULATE, AND JUDICIAL  
CONFESSION**

In open court and prior to entering my plea, I waive the right of trial by jury. I also waive the appearance, confrontation, and cross-examination of witnesses, and my right against self-incrimination. The charges against me allege that in Harris County, Texas, JOHNNY EVERETT WEBB, hereafter styled the Defendant, heretofore on or about JUNE 25, 1998, did then and there unlawfully, intentionally and knowingly possess a controlled substance, namely, Cocaine, weighing less than 1 gram by aggregate weight, including any adulterants and dilutants.

Before the commission of the offense alleged above, (hereafter styled the primary offense), on May 9, 1988, in Cause No. 22849, in the 13th District Court of Navarro County, Texas, the Defendant was convicted of the felony of robbery.

Before the commission of the primary offense, and after the conviction in Cause No. 22849 was final, the Defendant committed the felony of burglary and was finally convicted of that offense on March 10, 1992, in Cause No. 00-00-24433-CR, in the 13th District Court of Navarro County, Texas.

**AGAINST THE PEACE AND DIGNITY OF THE STATE.**

**FILED**  
CHARLES BACARIUSE  
District Clerk

AUG 05 1998

Time: 10:58  
Harris County, Texas

By: \_\_\_\_\_ Deputy

I understand the above allegations and I confess that they are true and that the acts alleged above were committed on

Aug. 25, 1998

In open court I consent to the oral and written stipulation of evidence in this case and to the introduction of affidavits, written statements, of witnesses, and other documentary evidence. I am satisfied that the attorney representing me today in court has properly represented me and I have fully discussed this case with him.

I intend to enter a plea of guilty and the prosecutor will recommend that my punishment should be set at

2 years confinement  
TDCS-ID

and I agree to that recommendation. I waive any further time to prepare for trial to which I or my attorney may be entitled.

DEFENDANT

Sworn to and Subscribed before me on

AUG 05 1998

HARRIS COUNTY DEPUTY DISTRICT CLERK

I represent the defendant in this case and I believe that this document was executed by him knowingly and voluntarily and after I fully discussed it and its consequences with him. I believe that he is competent to stand trial. I agree to the prosecutors recommendation as to punishment. I waive any further time to prepare for trial to which I or the defendant may be entitled.

DEFENDANT'S ATTORNEY (PRINT)

SIGNATURE OF DEFENDANT'S ATTORNEY

I consent to and approve the above waiver of trial by jury and stipulation of evidence

ASSISTANT DISTRICT ATTORNEY  
OF HARRIS COUNTY, TEXAS

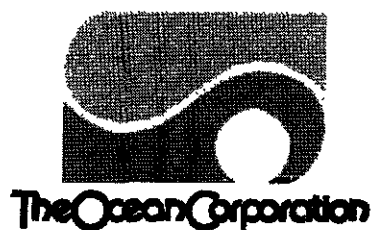
This document was executed by the defendant, his attorney, and the attorney representing the State, and then filed with the papers of the case. The defendant then came before me and I approved the above and the defendant entered a plea of guilty. After I admonished the defendant of the consequences of his plea, I ascertained that he entered it knowingly and voluntarily after discussing the case with his attorney. It appears that the defendant is mentally competent and the plea is free and voluntary. I find that the defendant's attorney is competent and has effectively represented the defendant in this case. I informed the defendant that I would not exceed the agreed recommendation as to punishment.

JUDGE PRESIDING

PLEA OF GUILTY

# **APPENDIX 31**





## BILLING STATEMENT

10840 ROCKLEY ROAD  
HOUSTON, TEXAS 77099  
PH: (281) 530-0202  
FAX: (281) 530-9143

### Ultimate Diver Training

Student Name: WEBB, JOHNNY

Student ID: UDT285-27

*Billed Charges*

04/30/1998 Tuition	\$10,500.00
--------------------	-------------

*Credits*

05/18/1998 Drop	\$ 8,910.00
-----------------	-------------

REMAINING BALANCE	\$ 1,590.00
-------------------	-------------

---

*Please Remit Payment To:*

The Ocean Corporation  
10840 Rockley Rd  
Houston, TX 77099

**The Ocean Corporation**

27-Mar-2014

3:18 PM

**Student Data Sheet**

**Student Records**

Page 1

**Name:** WEBB, JOHNNY

**SSN:** 456-69-2792

**Class Information**

**Class:** UDT285

**Student#:** 27

**# Action Forms:** 1

**Status:** DRP Dropped

**Application Date:** 21-Apr-1998

**Deposit Amount:** \$0.00

**Registration Date:** 21-Apr-1998

**Payment Method:** WAIVED LJ

**Graduation Date:**

**Medical Evaluation:** Y

**Medical Exam:**

**Bank Letter:** X

**I-20:** X

**I-20 In House:**

**TOUR Certified:** Y

**Paid in Full:**

**CPAT Scores**

**Language -** 54

**Reading -** 54

**Numeric -** 47

**Overall -** 55

**Diploma/Transcript:**

**Academic Transcripts Requested:**

**Academic Transcripts Received:**

**Academic Transcripts Not Received:**

**Previous Education:**

**Rec of Pol:**

27-Mar-2014  
3:18 PM

**The Ocean Corporation**  
**Student Data Sheet**  
**Student Demographics**

Page 1

Name: WEBB, JOHNNY      SSN: 456-69-2792

Address		Local Address	
5929 BISSONETT #117			
HOUSTON, TX		Phone:	Ext:
Phone:	Ext:		
Country:			

Date of Birth: 15-Jan-1970      Age: 28      Sex: M      U.S. Citizen: Y      Source: OTR  
Military Service:      Drivers License: 12792662      Race:

..... Emergency Contact .....

Name	Home Phone	Work Phone
------	------------	------------

Initial Employer	Current Employer
------------------	------------------

Phone:      Date Verified:

Date Employed:

Initial Wage:

TEA Code:

27-Mar-2014

3:11 PM

***The Ocean Corporation***

**Student Action Form**

**UDT285**

**Student:** WEBB, JOHNNY

**SSN:** 456-69-2792

**Date of Action:** 07-May-1998

**Last Day of Attendance:**

**Type of Action:** DRP Drop

**Drop/Withdraw Code:** JB Incarceration

**Action Taken By:** DON FAST

**Approved By:**

**Reason/Comment:** MR WEBB HAS BEEN PUT BACK IN JAIL AND HAS NOW  
MISSED TO MUCH OF THE NDT MODULE TO CONTINUE.

***The Ocean Corporation***  
***Attendance Lookup Report***  
**WEBB, JOHNNY UDT285**

<b>Class Date</b>	<b>AM</b>	<b>PM</b>
20-Apr-1998	P	P
21-Apr-1998	P	P
22-Apr-1998	P	P
23-Apr-1998	P	P
27-Apr-1998	A	A
28-Apr-1998	P	P
29-Apr-1998	P	P
30-Apr-1998	P	P
04-May-1998	P	P
05-May-1998	A	A
06-May-1998	A	A
07-May-1998	A	A

**Class Date**    **AM**    **PM**

**Class Date**    **AM**   **PM**

**Class Date**      **AM**   **PM**

27-Mar-2014

3:17 PM

***The Ocean Corporation***

**10840 Rockley Road**

**Houston, TX 77099**

**1-800-321-0298**

**Academic Transcript**

**Name:** WEBB, JOHNNY

**DOB:** 15-Jan-1970

**SSN:** 456-69-2792

**Address:** 5929 BISSONETT #117 HOUSTON, TX

**Program:** Ultimate Diver Training

**Clock Hours of Program:** 944

**GPA:** 54.33

**Start Date:** 20-Apr-1998

**Graduation Date:**

**Class Number:** UDT285

---

FIRST AID	MT 2 GENERAL
FIRST AID PRACTICAL	MT 2 SPECIFIC
CPR	MT 2 AVERAGE
CPR PRACTICAL	UT 1 GENERAL
RIGGING	UT 1 SPECIFIC
RIGGING PRACTICAL	UT 1 AVERAGE
BASIC PHYSICS & PHYSIOLOGY	UT 2 GENERAL
DECOMPRESSION PROCEDURES	UT 2 SPECIFIC
TREATMENTS	UT 2 AVERAGE
SCUBA	
SCUBA PRACTICAL	
BASIC TENDING & DIVING	
BASIC TENDING & DIVING PRACTICAL	
MIDTERM	
MIXED GAS	
MIXED GAS PRACTICAL	
BELL SATURATION	
WELDING & BURNING	
WELDING & BURNING PRACTICAL	
CONTAMINATED	
DIVING SECTION FINAL	
PT GENERAL	<u>75</u>
PT SPECIFIC	<u>80</u>
PT AVERAGE	<u>77</u>
MT 1 GENERAL	<u>43</u>
MT 1 SPECIFIC	<u>20</u>
MT 1 AVERAGE	<u>31</u>

---

School Official

Date

# **APPENDIX 32**



NAVARRO COLLEGE  
3200 WEST 7th AVENUE  
CORSICANA, TX 75110

THIS COPY FOR STUDENT'S RECORDS.  
RETURN BOTTOM PORTION ONLY.

Billing questions: 903-875-7323  
or  
903-874-8501

STUDENT'S  
NAME

Johnny E. Webb  
712 N. 23rd St  
Corsicana, TX 75110

### Student Receivable

		ACCOUNT NO.		DATE	PAGE
		0225638		03/25/14	
DATE	DESCRIPTION	CODE	REFERENCE NO	CHARGES	CREDITS
08/07/07	Payment - Thank You	GEN	000172075		90.00
09/01/07	Tuition - Cont. Ed. Fund	TCF		115.50	
10/24/07	Payment - Thank You	GEN	000180916		25.50
02/04/08	Payment - Thank You	GEN	000189579		132.00
09/17/12	Tuition and Fees	TFEE	V0351973	132.00	
08/27/10	Payment - Thank You	GEN	000268907		647.00
08/30/10	Fee - Building Use	FBU		61.20	
08/30/10	Fee - Matriculation	FMT		11.00	
08/30/10	Fee - Vehicle Registrati	FVR		10.00	
08/30/10	Lab - Industrial Technol	LIT		11.40	
08/30/10	Tuition - In District	TID		115.20	
09/17/12	Tuition and Fees	TFEE	V0351972	438.20	
Total:				894.50	894.50
0	1 - 60 Days		...	> 90 D	
-- --	-----	-	-----	-----	---
00	0.00 0	0	0		.00
				AMOUNT DUE W	0.00



NAVARRO COLLEGE  
Attn: Cashier's Office  
3200 WEST 7th AVENUE  
CORSICANA, TX 75110

TO ENSURE PROPER CREDIT TO YOUR ACCOUNT,  
RETURN THIS PORTION OF STATEMENT WITH REMITTANCE.

### Student Receivable

ACCOUNT NO.	DATE	CHARGES
0225638	03/25/14	0.00
MAKE CHECK PAYABLE TO NAVARRO COLLEGE		
AMOUNT DUE W		0.00
AMOUNT ENCLOSED W		

Johnny E. Webb  
712 N. 23rd St  
Corsicana, TX 75110



Cashier Myrna L Cook

Session 14332

Date 10/24/07

Receipt No 000180918

Batch :

Payer ID/Name 0225633		Johnny E. Webb		Payment Transfer	
AR Account Holder		AR Type	Term	Tfr	Amount
1	Johnny E. Webb	01 St	07/Q1	No	25.50
Non AR Receipt Code		Location		Amount	
1					
Deposit Account Holder		Dep Type	Term	Tfr	Amount
1					
Convenience Fees		0.00		Total Payments	25.50

Distribution GEN Payment - Thank You		Confirmation Number		Amount
Pay Method	Control Number	Charles Pearce Jr		25.50
1 CK CHECK	<input checked="" type="checkbox"/> 5108			
Change Returned		Cash	0.00	
		Total Received	25.50	

Receipt Print Dates 1 10/24/07

Reversed/Reason No ☒

Comments ☒

Reversal No ☒



Cashier Sara J Hill

Session 15546

Date 02/04/08

Receipt No 000183679

Batch.

Payer ID/Name 0225638		Johnny E Webb		Payment Transfer	
AR Account Holder		AR Type	Term	Tfr	Amount
1	Johnny E Webb	01 St	03/02	No	132.00
Non AR Receipt Code		Location		Amount	
1					
Deposit Account Holder		Dep Type	Term	Tfr	Amount
1					
Convenience Fees		0.00		Total Payments	132.00

Distribution GEN Payment - Thank You			
Pay Method	Control Number	Confirmation Number	Amount
1 OK CHECK	F 5413	Charles Pearce	132.00
Change Returned		Cash	0.00
0.00		Total Received	132.00

Receipt Print Dates 1 02/04/08

Reversed/Reason No F

Comments F

Reversal No F



# **APPENDIX 33**

NO. 00-00-24467-CR

71544

THE STATE OF TEXAS	*	IN THE 13TH JUDICIAL DISTRICT
	*	
VS.	*	OF
	*	
CAMERON TODD WILLINGHAM	*	NAVARRO COUNTY, TEXAS

STATEMENT OF FACTS

Volume II of 16 Volumes

PRETRIAL MOTIONS HEARING

**ORIGINAL**

A P P E A R A N C E S:

Mr. John H. Jackson  
Asst. Criminal District Attorney  
Navarro County, Texas  
Courthouse, Third Floor  
300 W. Third Avenue  
Corsicana, Texas 75110

For the State of Texas;

Mr. David H. Martin  
Attorney at Law  
DAWSON, SODD, MOE & MARTIN  
800 Ferris Avenue, Suite 200  
Waxahachie, Texas 75165

For the Defendant

**FILED IN**

COURT OF CRIMINAL APPEALS

NOV 23 1992

Thomas Lowe, Clerk

On the 24th day of July, 1992, the above and entitled cause came on to be heard in the said Court, Honorable Kenneth A. "Buck" Douglas, Judge Presiding, and the following proceedings were had, to wit:

I N D E XVOLUME II

	<u>PG. NO.</u>
Caption Page-----	1
Indictment Read-----	2
Rule 404(b) Request (Granted)-----	4
Motion for Disclosure of Favorable Evidence(1-8 Granted)	6
Motion for Discovery of Punishment Evidence(Granted)--	11
Motion to Instruct the Court Reporter(Granted)-----	12
Election of the Jury to Assess Punishment-----	12
Motion Invoking the Witness Rule(Granted)-----	12
Motion to List State's Witnesses(Granted)-----	13
Motion for Discovery and Inspection(1-14 Granted)-----	13
Motion for Removal of Handcuffs(Granted)-----	21
Reporter's Certificate-----	22

2 1 problem. I think we will do that by Tuesday. I intend to  
3 Xerox you all a copy of all matters related to extraneous  
4 offenses in the case.

5 MR. MARTIN: All right.

6 THE COURT: The next one -- that Motion is  
7 granted. The next Motion is for Disclosure of Favorable  
8 Evidence.

9 MR. MARTIN: Your Honor, for the record, it's my  
10 understanding, from Mr. Jackson, that he has already made  
11 available to me the complete prosecution file, which includes  
12 police offense reports, statements of witnesses, video tapes  
13 made by investigative agencies, as well as photographs made by  
14 investigative agencies, pathologist report, forensic reports,  
15 fire marshal's reports. And I understand, from Mr. Jackson,  
16 that he has either given me -- or will today or early next  
17 week give to me all of the evidence in the State's file. Did  
18 I understand that correctly?

19 MR. JACKSON: That's correct. And that file is  
20 available to you for inspection and copying of any material  
21 within that file, other than privileged information and those  
22 matters that are generally considered work product. Any  
23 offense reports, reports of scientific tests and experiments,  
24 photographs, certainly those are available and will be  
25 available for your inspection.

MR. MARTIN: Additionally, for the record, Mr.

1 Jackson has made available to me interviews of the State's  
2 witnesses; and I have either interviewed those witnesses or I  
3 understand that Mr. Jackson will make arrangements for me to  
4 do so either today or next week. Is that correct, as well?

5 MR. JACKSON: With regard to the witness that we  
6 have earlier discussed today, certainly, he will be available  
7 today for your interview. If you wish to interview any other  
8 witnesses, especially today or next week, I'll be more  
9 specific about who those witnesses are so we might can arrange  
10 to have them available for you.

11 MR. MARTIN: All right. I just want to make it  
12 clear for the record, though, that the State is making  
13 available to the Defense an interview with all of the State's  
14 witnesses.

15 MR. JACKSON: That's correct.

16 MR. MARTIN: Now specifically with regard to the  
17 Motion, Your Honor, in paragraph 1, we ask for information in  
18 the State's file that's favorable to the defendant or might be  
19 useful to the defendant. I don't know whether there's an  
20 objection to that one or not.

21 MR. JACKSON: No objection. I don't know of  
22 anything that would be favorable to the defendant at this  
23 point. Certainly, that would fall into the category of a  
24 Brady-type function. I don't know of any evidence that's  
25 available to the State or in the possession of the State or

1 that the State knows about. Certainly, I think we'd be under  
2 a duty to disclose that type of information, should we be in  
3 the possession of any.

4 MR. MARTIN: Is that one granted, then, Your  
5 Honor?

6 THE COURT: It's granted.

7 MR. MARTIN: No. 2 is oral information of the  
8 Prosecutor's knowledge inconsistent with the guilt of the  
9 defendant or that's relevant to punishment.

-10 MR. JACKSON: We would be happy to furnish any  
11 such information, but we know of no such evidence at this  
12 point.

13 MR. MARTIN: Is that one granted, then?

14 THE COURT: Granted.

15 MR. MARTIN: No. 3, the names of witnesses whose  
16 testimony supports or raises a defensive issue which may  
17 reasonably arise at trial.

18 MR. JACKSON: The State has no knowledge of  
19 any testimony which would raise any defensive issue which  
20 would reasonably arise at trial. Should the State come into  
21 possession of such evidence, it would immediately be  
22 disclosed.

23 THE COURT: Granted.

24 MR. MARTIN: No. 4, the testimony of witnesses  
25 that conflicts with the statement of any witness that the



1 Prosecution intends to introduce.

2 MR. JACKSON: This -- I guess I wonder exactly  
3 how far this particular matter goes. I've never been, you  
4 know, involved in any case in my trial where there was not  
5 some conflict or inconsistency, at least of a minor nature.  
6 I know -- I know that the testimony which conflicts, as far as  
7 any matter that I would consider relevant or material to the  
8 case, although I have some reservations about saying that  
9 there are no conflicting statements or evidence in the case.  
10 Certainly, I know of no conflicts of any material nature such  
11 as might affect the outcome of the case.

12 MR. MARTIN: Primarily, what we are requesting is  
13 the identification of witnesses known to the State whose  
14 testimony would conflict with the witness they intend to  
15 offer.

16 MR. JACKSON: I know of no such witness that  
17 would -- whose testimony would conflict on any material or  
18 relevant matter.

19 THE COURT: To that extent, it's granted.

20 MR. MARTIN: And I also understand, Mr. Jackson,  
21 that you have given to me or will give to me the name of any  
22 witness that the State knows of who is a witness to the  
23 alleged offense. Is that my understanding?

24 MR. JACKSON: Excuse me (coughed) -- that is  
25 correct.

2 1 MR. MARTIN: No. 5, witnesses whose testimony  
2 concerns the character and reputation of any witness for the  
3 Prosecution that would be adverse to the credibility of that  
4 witness. In other words, witnesses that the State knows of  
5 who could impeach a witness that they are going to present.

6 MR. JACKSON: The State knows of none at this  
7 point. I'm not sure that we're going to be under any duty to  
8 disclose that type of information. I'm certainly not aware of  
9 any witness who would be able to impeach a witness who we  
10 intend to call.

11 MR. MARTIN: If one comes to your knowledge,  
12 would you agree to disclose the identification--

13 MR. JACKSON: For purposes of this -- I think I  
14 would not generally do that in most cases, but I will in this  
15 case.

16 THE COURT: It's granted as -- as what's  
17 contained in the record, what you all are trying to do.

18 MR. MARTIN: No. 6, evidence affecting the  
19 credibility of the Prosecution witnesses, including prior  
20 convictions, dishonorable discharges, or prior history of  
21 mental illness or psychiatric treatment.

22 MR. JACKSON: We'll disclose, if we know about  
23 it. I don't think we're under a duty to make investigation of  
24 these witnesses to ascertain that material. If we -- if we  
25 have any knowledge of it that reasonably comes into our

possession, we'll disclose it.

THE COURT: To that extent, it's granted.

MR. MARTIN: No. 7, nontestimonial evidence which conflicts with the testimony of any of the State's witnesses or tends to negate the State's theory.

MR. JACKSON: I have no objection to that, Your Honor.

THE COURT: Do what?

MR. JACKSON: I have no objection to that.

THE COURT: Okay; granted.

MR. MARTIN: And No. 8, we are requesting a continuing Order requiring the Prosecution to disclose the existence of nonprivileged evidence presently known; and upon discovery of same, either prior to or during the trial of the Cause, that it be revealed to the Defense.

MR. JACKSON: I think my previous statements I'll allow to stand at this point; any nonprivileged evidence presently known to us, I don't have any problem with disclosing.

THE COURT: It's granted.

MR. MARTIN: All right. Your Honor, the next Motion that we have is a Motion for Discovery of Punishment Evidence. The names of witnesses or identification of tangible evidence related to any unajudicated offenses which the State intends to offer at Punishment Hearing. And then

# **APPENDIX 34**

9-9-00  
JUDGE JACKSON  
4-3-00  
J.P.A.

## MOTION TO RECALL TESTIMONY

NOW COMES, JOHNNY E. WEBB, TO THE HONORABLE COURT OF THE 13<sup>TH</sup> DISTRICT COURT OF NAVARRO COUNTY, AND TO THE HONORABLE DISTRICT COURT JUDGE JOHN JACKSON.

I COME NOW TO SAID COURT AND RESPECTFULLY REQUEST THAT TESTIMONY GIVEN IN THE WILLINGHAM CAPITAL MURDER CASE BY "MR. JOHNNY E. WEBB," BE MADE NULL AND VOID. I, JOHNNY E. WEBB, WISH TO WITHDRAW AND RECALL ALL TESTIMONY GIVEN IN SAID TRIAL.

I AM GIVEN NO OTHER CHOICE BUT TO MAKE THIS MOTION TO RECALL TESTIMONY AT THIS TIME I WAS FORCED TO TESTIFY AGAINST MR. WILLINGHAM BY THE D.A.'S OFFICE AND OTHER OFFICIALS. I WAS MADE TO LIE. MR. WILLINGHAM IS INNOCENT OF ALL CHARGES.

SUBMITT THIS MOTION TO RECALL TO THE COURT FOR THE SOONEST POSSIBLE CONSIDERATION.

RESPECTFULLY SUBMITTED  
THIS 30<sup>TH</sup> DAY OF MARCH  
2000  
LEGAL MAIL

JOHNNY E. WEBB #626256  
JAMES V. ALLRED,  
2101 FM. 369 N,  
TOWN PARK, TX. 76367-6568

NAVARRO COUNTY COURTHOUSE CORSIANA.  
13<sup>TH</sup> DISTRICT COURT D.A.'S OFFICE CLERK  
300 WEST 3<sup>RD</sup> AVE.  
CORSIANA, TX 75110

3-30-00 SEALED

LEGAL MAIL

7511049572

# **APPENDIX 35**

THE STATE OF TEXAS       \*  
                                  \*  
COUNTY OF McLENNAN       \*

AFFIDAVIT OF WALTER M. REAVES, JR.

BEFORE ME, the undersigned authority, on this day personally appeared WALTER M. REAVES, JR., who on her oath states as follows:

My name is Walter M. Reaves, Jr. I am over twenty-one years of age, competent to make this affidavit, and have personal knowledge of the facts stated herein.

I am attorney, having been licensed to practice law by the State of Texas of 1980. My practice is focused on criminal defense, with a substantial portion being devoted to post-conviction litigation in both state and federal courts. In addition to my private practice I currently am an adjunct professor at Baylor Law School, where I teach appeals and habeas corpus.

I represented Cameron Todd Willingham in his post-conviction proceedings, having been appointed to do so by the Texas Court of Criminal Appeals. During the course of my representation I filed applications for writs of habeas corpus in both State and Federal Courts, and pursued appeals to the United States Court of Appeals for the Fifth Circuit and United States Supreme Court. I also represented Mr. Willingham in presenting a request for commutation and request for reprieve to the governor's office and Texas Board of Pardon Paroles.

During the course of my representation I became aware of Johnny Webb, who testified at trial. I personally interviewed Mr. Webb, and he confirmed his trial testimony. I now know that Mr. Webb filed a declaration of recantation. I was not aware that such a notice had been filed before Mr. Willingham's execution. A copy was not sent to me by any person, nor was I informed by any source that such a document had been executed. Had I been aware of such document I would have included that in the court filings I submitted, as well as the material I submitted to the Board of Pardon and Paroles and the governor's office.

  
\_\_\_\_\_  
WALTER M. REAVES, JR.

# **APPENDIX 36**



*Sub. sent to Gov.*

**BEFORE THE GOVERNOR OF THE STATE OF TEXAS  
AND  
THE TEXAS BOARD OF PARDONS AND PAROLES** *one BD P.P.*

IN RE  
**CAMERON TODD  
WILLINGHAM**  
Petitioner

**APPLICATION/PETITION FOR A NINETY-DAY  
REPRIEVE FROM THE EXECUTION OF HIS  
DEATH SENTENCE AND FOR COMMUTATION  
OF SENTENCE TO IMPRISONMENT FOR LIFE**

Walter M. Reaves, Jr.  
Attorney at Law  
P.O. Box 55  
West, Texas 76691  
(254) 826-3713  
(254) 826-5572 — Facsimile  
State Bar No. 16644200  
E-mail: [wmreaves@postconviction.com](mailto:wmreaves@postconviction.com)  
January 26, 2004

**THIS IS A CAPITAL CASE**

MR. WILLINGHAM WAS CONVICTED IN NAVARRO COUNTY, TEXAS  
AND IS SET TO BE EXECUTED ON FEBRUARY 17, 2004

## I.

PROCEDURAL HISTORY

Petitioner was charged by indictment issued by the Navarro County Grand Jury with the offense of capital murder. Petitioner entered a plea of not guilty, and jury selection commenced on August 10, 1992 in the 13th District Court of Navarro County, Texas, the Honorable Kenneth A. Douglass, presiding. Trial commenced on August 19, 1992 and concluded on August 20, 1992 when Petitioner was found guilty. Punishment was subsequently assessed death, in accordance with the jury's answers to the special issues.

Petitioner appealed to the Texas Court of Criminal Appeals. His conviction and sentence were affirmed in a published opinion, delivered on March 22, 1995, *Willingham v. State*, 897 S.W.2d 351 (Tex. Crim. App. 1995), cert. denied 516 U.S. 946 (1995). Following an unsuccessful Motion for Rehearing, a Petition for Writ of Certiorari to the United States Supreme Court was denied. Petitioner subsequently filed an application for writ of habeas corpus in the trial court on December 11, 1996. Without a hearing, the trial court entered findings of fact and conclusions of law on August 28, 1997, and recommended that relief be denied. The Texas Court of Criminal Appeals followed that recommendation, and denied the application for writ of habeas corpus on October 31, 1997. Petitioner then filed another petition for writ of certiorari, which was denied. 524 U.S. 917 (1998)

Following the exhaustion of his state remedies, Petitioner filed an Application for Writ of Habeas Corpus in the United States District for the Northern District of Texas. Without a hearing, the Court denied relief on December 31, 2001. *Willingham v. Johnson*, 2001 WL 1677023 (N.D. Tex.) Petitioner sought an Application for a Certificate of Appealability which was denied. Petitioner then took his appeal to the United States Court of Appeals for the Fifth

Circuit, and sought a certificate of appealability from that court. The court denied the certificate of appealability, and affirmed the denial of relief, in an unpublished opinion delivered on February 17, 2003. Petitioner then filed a petition for writ of certiorari in the United States Supreme Court, which was denied on November 3, 2003.

## II.

### FACTUAL SUMMARY

Petitioner was charged with the death of his three children, in a house fire. According to the state, Petitioner intentionally set the fire by pouring a combustible liquid throughout the house. The state's case against Petitioner was largely circumstantial. They relied on Petitioner's behavior following the fire, as well as his refusal to go back into the house to get his three children. They also relied on his behavior following the fire, when he and his wife went to the house to clean up. The state also presented testimony from a jail inmate, who testified Petitioner admitted setting the fire.

Some of the more significant evidence was not presented at trial. Petitioner had a witness available to testify, James McNally, who was in jail with petitioner and the inmate who testified against him. (Johnny Webb). McNally was prepared to testify that Webb was threatened, and he believed was not being truthful about what petitioner had told him. The judge would not allow the testimony. There was also evidence that petitioner's wife had a \$10,000.00 insurance policy on the children, which she collected on after petitioner was indicted. She used the money almost immediately to purchase a truck. Additionally, there was a witness who could have testified that petitioner's wife told her that having three children had caused her nothing but trouble. This evidence was not presented by petitioner's lawyers.

Petitioner had two felony convictions, one for second degree burglary in Oklahoma, and the other for larceny. He also had several misdemeanor convictions, including carrying a concealed weapon, public intoxication, driving under the influence of liquor, and contributing to the delinquency of a minor. The state also offered evidence Petitioner was verbally and physically abusive toward his wife, even though she denied it. Finally, the state offered expert testimony through Dr. James Griggson, that Petitioner was likely to be a threat in the future, and that rehabilitation was not likely.

### III.

**THE ACTUAL DECISION TO IMPOSE THE DEATH PENALTY IN THIS CASE HAS NOT BEEN REVIEWED BY ANY COURT NOR HAS ADDITIONAL EVIDENCE OF INNOCENCE**

It is now clear that there is appellate review of a death sentence in Texas. While the Court can still determine whether the first issue is supported by the evidence, a determination of whether a life or death sentence should be imposed is not subject to any appellate review. There is no procedure in place for the jury to specify what mitigating circumstances it may find to exist, or what aggravating circumstances it may find. In short, neither a trial judge nor an appellate court have any way of determining what the jury's decision is based on. As a result, there is no way to determine whether the jury's findings are supported by the evidence, or whether the decision was arbitrary or capricious. That decision should be made before a death sentence is carried out, and it is up to this board to do so.

There are two parts to any death penalty decision. One is the eligibility decision, and the other is the selection decision. Under the current Texas Scheme, the court only reviews the eligibility decision. If the evidence is sufficient to establish a defendant's eligibility for the death

sentence, the sentence is affirmed. There is no review of the selection decision, which Petitioner suggests is the current vice in the Texas Statute. Thus, there is no check on a jury's arbitrary or capricious decision to impose the death penalty in Texas. Because the Court will not review the jury's ultimate decision to impose the death penalty, there is no remedy for a sentence which the Court may feel is arbitrary or freakish. As a result, a defendant may be sentenced to life or death by different jurors, based on the same evidence.

Petitioner suggests the lack of appellate review was particularly significant in this case, and for that reason such review must be conducted by this board. There were a number of mitigating factors favoring Petitioner. While petitioner did not have a stellar record as a juvenile, he did attempt to better things. Petitioner believes letter will be submitted to the Board from a former judge in Oklahoma, as well as his former juvenile probation. Both those individuals have valuable information that should be considered before any decision is made. Additionally, petitioner suggests the lack any strong evidence tying petitioner to the murder is a mitigating factor that should be considered by someone. While a jury has determined guilt beyond a reasonable doubt, petitioner suggests that decision was made on less than all the available evidence. When the decision is as significant as the one here, petitioner suggests any doubt should be resolved in his favor. The evidence in this case is exactly the type of evidence that is conducive to wrongful convictions, namely jailhouse testimony, and circumstantial evidence that can be interpreted in more than one way. If nothing else, petitioner suggests the board should allow petitioner additional time to develop any evidence of innocence.

## IV.

REQUESTED RELIEF

In light of the above, and with the additional arguments below, Mr. Willingham requests the following relief be granted:

- A. Mr. Willingham requests an interview with a member of the board. TEX. ADMIN. CODE tit. 37 § 143.57(e)
- B. At least a 30 day reprieve pursuant to TEX. ADMIN. CODE tit. 37 § 143.41 is requested.
- C. Pursuant to TEX. ADMIN. CODE tit. 37 § 143.42 (West 1999), an additional 60 day reprieve is requested to allow the Supreme Court of the United States adequate time to consider the legal issues raised by this matter. Pursuant to Code, the following information is provided *in bold italics*:

## VIII.

ADDITIONAL INFORMATION

- 1. The name of the applicant, together with any other pertinent identifying information  
  
*Cameron Todd Willingham, TDC No. 041.*
- 2. Identification of the applicant's agents, if any, who are presenting the application.  
  
*Walker M. Reaves, Jr., Attorney at Law, P.O. Box 55,  
West, Texas 76691. State Bar Number 16644200.*
- 3. Certified copies of the indictment, judgment, verdict of the jury, and sentence in the case, including official documentation verifying the scheduled execution date, if said information is not contained in the sentence.  
  
*Attached as Exhibit "A". Applicant has only copied the Order Setting Execution Date, which contains the information requested above, but will provide further information upon request, if necessary.*
- 4. A brief statement of the offense for which the prisoner has been sentenced to death

*This is found in the Application under Roman Numeral II.*

A brief statement of the appellate history of the case, including its current status.

*This is found in the Application under Roman Numeral I.*

5. A brief statement of the legal issues which have been raised during the judicial progress of the case.

*1) Petitioner has alleged that he was denied the right to represent himself on appeal, which he requested after it became apparent that his lawyer was not going to diligently pursue the appeal by not raising a number of meritorious issues. Petitioner has alleged he did not received the effective assistance of counsel on appeal. Counsel failed to raise a number of issues that could have resulted in the reversal of his conviction. Those issues included the erroneous granting of two challenges for cause, the refusal to allow petitioner to fully question jurors, the erroneous introduction of hearsay testimony, and the erroneous introduction of expert testimony, as well as allowing the improper impeachment of one of petitioner's character witnesses. 2) Petitioner has alleged the Texas death penalty statute is unconstitutional because it does not provide for review of the jury's decision to impose the death penalty. 3) Petitioner has also alleged error in the failure to provide jurors with information correct information concerning parole, which was that if petitioner was sentenced to life in prison he would not be eligible for parole until he served 35 years.*

6. The requested length of duration of the reprieve, which shall be in increments of 30 days that is, 30, 60, 90, etc., unless a different duration is requested upon the basis of the grounds for the application set forth pursuant to paragraph (8) of this section.

*Mr. Willingham requests a 90 day reprieve.*

7. All grounds upon the basis of which the reprieve is requested; provided that such grounds shall not call upon the board to decide technical questions of law which are properly presented via the judicial process.

*There are two main reasons for granting a reprieve in this case. The most significant is to allow petitioner to develop evidence of his actual innocence, or at a minimum evidence of prosecutorial misconduct. On the most significant pieces of evidence against petitioner came from a jailhouse informant, Johnny Webb. Petitioner has reason to believe that Webb's testimony was false, and was the product of prosecutorial*

*misconduct. Petitioner has located a witness who can testify as to how Webb was coached in his testimony. Petitioner also has reason to believe that upon being released from prison Webb was provided with a car. Petitioner has been unable to develop this information earlier because of a limitation on funds. Additionally, Webb has only recently been open to talking about really happened. The second reason is the pending attack on the legality of the method Texas uses to execute prisoners. A civil rights suit has been filed on behalf of all prisoners with pending execution dates. Petitioner suggests it is as substantive, legitimate, issue, that deserves to be developed.*

8. A brief statement of the effect of the prisoner's crime upon the family of the victim.

*Counsel for Mr. Willingham is unaware of any written victim impact statement although there may well be one in the records which are not generally considered public. Petitioner would note that the family of the victims in this case includes petitioner's family, which include his parents who have lost their grandchildren. Petitioner has been advised that his ex-wife, and mother of the victims, supports him, and does not believe he committed this offense. As such, she also believes he should not be executed.*

- D. Mr. Willingham requests that his sentence be commuted to life imprisonment.

Respectfully submitted,



Walter M. Reaves, Jr.

P.O. Box 55

West, Texas 76691

(254) 826-3713

(254) 826-5572 -- Facsimile

State Bar No. 16644200



# **APPENDIX 37**

# NAVARRO COUNTY



**JOHN H. JACKSON**

JUDGE, 13TH JUDICIAL DISTRICT COURT  
NAVARRO COUNTY COURTHOUSE  
P.O. BOX 338  
CORSIKANA, TEXAS 75151-0338

DIXIE FINCHER  
COURT COORDINATOR  
(903) 854-3020

LESLIE KIRK  
OFFICIAL REPORTER  
(903) 854-3022

February 5, 2004

The Office of the Governor of the State of Texas    *SENT VIA FAX (512) 467-0945*  
General Counsel Division  
P.O. Box 12428  
Austin, Texas 78711

Ms. Maria Ramirez    *SENT VIA FAX (512) 463-1932*  
The Texas Board of Pardons and Paroles  
Executive Clemency Section  
P.O. Box 12438  
Austin, Texas 78711

Re: Application for Reprieve and Commutation of Sentence filed by Cameron Todd  
Willingham

Dear Chief Counsel and Ms. Ramirez,

I have received a copy of the referenced application from the Criminal District Attorney of Navarro County. Because I was lead State's trial counsel in this case, it seems proper for me to comment on certain issues raised in the application. This correspondence will not address legal issues which I trust have been fully examined by the Appellate Courts on direct appeal and in the course of habeas proceedings. Willingham's application raised several issues which may be termed "fundamental fairness" matters in Section VIII, part 7. I will address these separately.

PROSECUTORIAL MISCONDUCT. The application alleges that the testimony of Webb, a prosecution witness, was false, the same being a product of "coaching" by State's counsel. During Willingham's confinement in the Navarro County Jail, Webb was also an inmate, incarcerated on robbery charges. Webb sent word to

me that Willingham had admitted to him that he killed his children. I later met with Webb and obtained a written statement. Webb testified in the trial consistent with his statements regarding Willingham. I did not offer Webb any consideration for his cooperation and he was later sentenced to 15 years in the robbery case. Based on the circumstances of the Webb robbery (he threatened to hit an acquaintance with a stick if she refused to give him her purse) the sentence seems entirely adequate.

Mr. Webb corresponded with me on several occasions while in prison. The subject of these letters was invariably a plea for protection after a misguided documentary film maker allegedly disclosed Webb's whereabouts in the system to Willingham and his relatives. Webb's letters were specific in describing how he had been targeted for death and/or serious injury by the Aryan Brotherhood, to whom Willingham had described Webb as a "snitch." Webb also disclosed that he had been forced, upon threat of death, to make a "recantation" of his testimony. Webb's correspondence to me states, "I did NOT write this (recantation) willingly nor did I ever lie at the Willingham trial."

The application also suggests that Webb was provided with a car after his release from prison, presumably as a pay-off for his testimony. I am aware that Webb was acquainted with a Corsicana businessman and philanthropist by the name of Charles Pearce who provided the means for a number of convicts to seek rehabilitation, including vocational training and counseling. Any benefit Webb may have obtained from Pearce at a time remote from the Willingham prosecution had no connection with Webb's testimony or his role in these proceedings. I can state with complete assurance that Webb never received a car from anybody as consideration for cooperation in this case.

LIMITATION ON FUNDS. Applicant recited that he has been "unable to develop this information because of limitation on funds." I have, at all times, been available to help develop such issues at little or no cost to applicant or his attorney. I will submit that the reason this information has not been "developed" is that (1) it had no impact on the Willingham proceedings and (2) evidence of death threats toward a witness (which would be the inescapable result of investigation) would not support Applicant's request for relief.

Please do not hesitate to call me if you require further information on any issue raised by applicant. I am aware of no evidence which would entitle Cameron Todd Willingham to

reprieve, commutation, or clemency for the brutal and horrific murders of his three children.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "John H. Jackson".

John H. Jackson, Judge  
13<sup>th</sup> Judicial District

JHJ:df

# **APPENDIX 38**

## AFFIDAVIT OF JOHN H. JACKSON

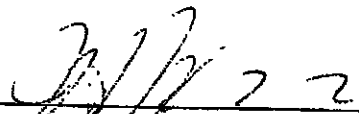
THE STATE OF TEXAS  
COUNTY OF NAVARRO

BEFORE ME, the undersigned authority on this date personally appeared JOHN H. JACKSON, who after being by me duly sworn did upon oath depose and state as follows:

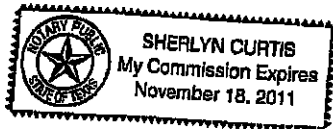
1. My name is John H. Jackson. I reside in Navarro County, Texas and am fully competent to make this affidavit. I am Sr. Judge of the 13<sup>th</sup> District Court of the State of Texas. The matters in this affidavit are within my personal knowledge unless noted to the contrary.
2. I was first-chair prosecutor in the State v. Willingham capital murder case. In that capacity I was well acquainted with Johnny Webb, a jail inmate who testified at the trial that Willingham confessed to the murder of his children by starting a fire at their residence. Webb was offered no reduction in punishment for his testimony and ultimately received a sentence of 15 years in connection with the robbery case in which he was charged at the time of the Willingham trial.
3. In February of 2000, a Navarro County resident by the name of Charles Pearce, Jr. came to my chambers in the Courthouse and delivered to me the letter and enclosing envelope a copy of which is attached hereto as Exhibit A. The envelope and letter was in the handwriting of Johnny Webb which is well known to me based upon much correspondence which I have received from Webb over the past 15 years. Charles Pearce, Jr. was an individual who assisted a number of criminal defendants, including Webb in various rehabilitation attempts.
4. The substance of the letter very clearly sets out Mr. Webb's explanation of his "recantation" of testimony related to the Willingham confession. It explains that a documentary film-maker by the name of Liz Gilbert interviewed both Webb and Willingham with a view toward assisting Willingham. Webb's letter explains that Gilbert advised Willingham of Webb's whereabouts in the Institutional Division of TDCJ and that another death row inmate communicated this information to his brother in the same unit as Webb. Webb relates in this correspondence that he is being forced, under threat of death to make a false recantation of his testimony. The correspondence implies that such threats originate from "AB," or Aryan Brotherhood.
5. Johnny Webb has at all times to me maintained the truthfulness of his testimony establishing that Willingham started a fire in the residence by which he murdered his

three children. Webb's testimony is also dovetails with the statements and testimony of witnesses that Willingham attempted to kill his children before they were born by savage beatings of his wife during the two pregnancies. These statements and testimony were offered by witnesses who observed the injuries to Stacy Willingham, and to whom she made admissions of these circumstances.

SIGNED this 4<sup>th</sup> day of October, 2010.

  
John H. Jackson, Affiant

SUBSCRIBED AND SWORN TO before me by John H. Jackson on the date above written.



  
Notary Public, State of Texas

# **APPENDIX 39**



Dear Mr. Pearce,

2/12/00

I just received your letter of the 11<sup>th</sup>. One day that's fast service.

I hope this letter finds you in the best of health and highest of spirits and your daughter as well.

I really do appreciate the money you sent me and the parole package too. I sure needed both.

As to the Liz Gilbert Business. Well, I have recently found out nothing from her. But I have found out that she is working for Willingham's behalf.

Mr. Pearce, I'm so scared right now that I'm in tears as I write this letter. She told Willingham what unit I'm on. It's all over the unit that I'm a sitch for the state. Everyone knows I put him on Death row. There is a dude over here that has a ~~bro~~ brother on Death row. His name is Collier. The brother here is name Steve Collier. Willingham got that dude to write over here and spread the word on me. (I'm Fucked!) Collier has been on Death row with Willingham since '96. She also told him that the state refuses to give me any protection from the AB. So it's over season on my ass!!

Willingham 5

I've already been told that I have "NO" choice, but to write a letter or Motion to recant my statement against him, or I'm a dead motherfucker. So I've got NO other choice but to do as they say to ~~be~~ buy myself some time.

I "DO NOT WANT TO DO IT." But I'm being forced to do it against my will. If I don't they will either kill me or stab me up real bad. I don't want to get hurt.

I've already told those people that I have some stationery coming and when it gets here I'll write whatever they want. I am also going to write Liz Gilbert and ask her how she could have done that to me.

I'm going to make a Carbon copy of it and write John an official letter, telling him what's going on and about being forced to write a motion to recant and send him the Carbon copy of Liz's letter.

That's all I can do. I'm in a catch 22. You know Mr. Pearce, The motion for recant will be invalid because I'm being forced to write it. And once that motion is voided, then ~~by~~ it will start all over again. I sure hope not, but I know they won't give up.

Mr. Pearce, I don't see how it can be legal for Liz to do that. Because she told me she wouldn't tell Willingham anything about me. Man, I was worried about the news, I never dreamed it would go down like this.

Man, I'm on a Max Security lock down unit with dudes that have life sentences that really don't care. When I write this recourt motion they're going to fuck me off.

Well, I guess that's all I can really say about now. We'll see what happens. It looks like its in Gods hands now.

If I hear something from that bitch I'll let you know. But I can see now she got all the information she needed. I wonder if she can sleep well at night know how close she is to getting me killed??

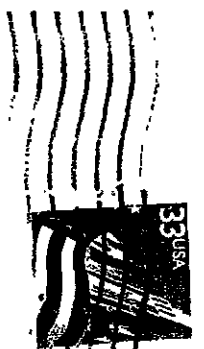
Take Care of Yourself Mr Pearce and I'll try to do the same.

Awaiting your response I shall remain.

Love always and  
Forever your friend

Johnny

Johnny Grubbs # 626256  
DAKES V. ALLRED Unit  
2101 FM 369 N.  
IOWA PARK, TX. 76367-6563



C. S. Reese Jr.  
P.O. Box # 645  
Covington TX. 75716

75151/0645

# **APPENDIX 40**

Dear Mrs. Houston,

9-29-01

Hello, how are things going with you these days? I do hope all is well with you and your family. Hopefully this letter will reach you in the Best of ways.

You may not remember me right off but you interviewed me here in prison concerning the Willingham Capital Murder Case, back in 2000.

I agreed to the interview because there was nothing to hide concerning that case and I felt it was just the right thing to do. Most people in Prison, either ask for money or some kind of favor in return for their interview. As I hope you recall I asked for neither. Even though I sure could have used a little extra cash since T.D.C. doesn't pay inmates for working.

Anyway, the reason for this letter is in regards to what you offered me and made promise to give me, of your own free will. You told me that you would see to it that I received some of the best pictures taken of myself, so I could send them to friends and family, because I have no pictures of myself to send out.

You also stated that you would inform me of the article so I could see how I was being portrayed in your article.

Well, here it is almost 2 years later and I have never heard one word from you. Please do not think that I'm being

sarcastic toward you, because I don't mean it that way. I'm just stating facts. You have never tried to contact me.

You seemed like such a nice lady and I totally believed what you told me. I guess I was the big fool there, huh. I also do understand the way most people see a person who is in prison. (He's just a convict to hell with him). Although this may or may not be your personal opinion, it does seem that way to me.

I guess most people wouldn't write to you and state their displeasure about the situation. But what maybe nothing to you are others, maybe something totally different to someone in my situation. I just don't think I was treated very fairly.

I'm seriously considering filing a complaint with Another Diana Weeks Production. Because I just don't think it's right to treat people badly just because they are locked up. No I probably won't go that far.

Maybe you just simply forgot. God knows you're probably busy as hell.

I just want you to know just how disappointed I was about it. To me a person's word, is their bond.

Take care of yourself Liz. I hope everything is going well for you. Most of the country is still upset about the attack. I sure hope you didn't lose anyone.

Write if you wish.

Sincerely yours.

Johnny E. Webb

Dear Liz

12-26-01

Greetings, regards, and the utmost respect to you. I hope this letter finds you in the best of health and the highest of spirits.

I have received your most welcome letter. I must say, I am very pleased to hear from you, because I thought I might not. I also must apologize for the content in my first letter to you. I was really feeling down and out. Prison has that effect on me from time to time. So I hope you will understand.

Thank you for your help in trying to get me some copies of these photographs. Those copies will surely come in handy. Since my family has no pictures of me that are newer than 8 years old.

I wasn't aware that you wrote fiction. I just assumed you wrote true crime. I do understand that writing stories and or books isn't a simple task. I have been thinking about writing a book myself. I have been encouraged to do so, by a number of people. But the content of the book would be controversial to say the least. But I have been told that controversy could also help with book sales!



Any chance of me writing a Book is a long way away. Mr. Pearce has encouraged me to think hard about the issue. He has wrote 9 books, so his advise is invaluable. I still have a lot of reading and research to do before that day comes.

Please keep me informed about the pictures and your writing as while. I am very interested in the content and the portrayal of all involved.

I do wish you all the very best in your project and the success of it. There are really many angles from which separate stories are derived. The investigators have their story, along with witnesses and family members on both sides. Something to think about we have all been affected by this case one way or the other!

I Truly hope you had a wonderful Christmas. And wishing you the very best of the new year to come. Take care of yourself. Write if you can.

Awaiting your response I shall always remain.

Sincerely

Johnny E. Wolff

Dear Elizabeth,

3-14-02

Hello, Greetings, Regards and the Best of respects to you. I hope this letter finds you in the best of health and highest spirits. Only the best wishes for you.

First, I'm sorry it has taken me so long to respond to your letter. But this denied me the magazines you sent me, so I appealed it! I wanted to wait until I received a response before I wrote to you. I'm sending you the denial and appeal.

Say, I really do appreciate the photos that you sent to me. But, Darn, I look depressed as hell. I thought I had smiled a little. But for real. I sent one picture to my mom and she said it made her cry to see me look so depressed. I guess pictures are not always a good thing.

Thank you very much for your well wishing. Not many people wish well of me these days. Much less takes time to write to me. So your letters and wishes are more well received than you might think.

About my book. I want to write about the lack of a state witness protection program.



I guess I got baby oil on the bottom of that page.  
 Don't just didn't want to work.

Like I was saying. I don't have anyone out there to help me with a project like that. So all I can do is wait.

But, I will gladly accept any and all advice you may have to offer. I do appreciate your encouragement.

I receive a Book Catalog from Edward R. Hamilton Book seller. The catalog has lots of good Books. But one that caught my interest recently was a Book called "The Writers Market" It lists over a 1000 different companies and individuals who buy what people write. Poems, short stories, articles, ect ect. Have you ever heard of it?? I think it would be a worthwhile Book for a person in your line of work. I can send you the info if you like?

So you turned 50, the day I wrote you the letter. Well, please don't tell anyone, Because you sure don't look it and I don't think you have to worry about someone guessing your age. You really look no more than 37-38. Atleast that's what I had thought when I met you. You're a beautiful woman. But hey, 50 isn't that old either. So don't make it sound old. You have a long life still ahead of you. Hell, I'm only 33. But I hope to be dancing with girls when I'm 85!! HAHAHA

You know what they say, "You're only as old as you think you are!"

Yeah, I hear you about it being controversial (the Book) the better. They friend once told us that controversy was away of selling at the right time.

I just want people to know that prison isn't as easy as those asshole politicians tell them it is. And that there is a lot of sons, daughters, husbands, wives and other family members down here being done real bad by a system out of control.

Say, I don't know if you like Business magazines or not. But I'm sending you a free magazine card. Order it, it's a good mag. I try to learn anything I can down here to make me a better person.

I'll close for now, but not forever. Take Care of Yourself Liz. I hope all is going well for you and your family. Write when you can. I do enjoy your letter.

Awaiting your response I shall remain.

Always Jimmy

# **APPENDIX 41**

---

September 26, 2013

# **Citing New Evidence, Urging a Posthumous Pardon in 1992 Case**

By BRANDI GRISSOM

Armed with what it says is new evidence of wrongdoing in the prosecution of Cameron Todd Willingham, the Innocence Project on Friday will ask Gov. Rick Perry to order the Texas Board of Pardons and Paroles to investigate whether the state should posthumously pardon Mr. Willingham, whose 2004 execution has become a lightning rod of controversy over the Texas justice system.

“This is a terrible thing to not only execute somebody who was innocent; this is an individual who lost his three children,” said Barry Scheck, co-founder of the Innocence Project, a legal group that focuses on wrongful convictions.

The organization says it discovered evidence that indicated the prosecutor who tried Mr. Willingham had elicited false testimony from and lobbied for early parole for a jailhouse informant in the case.

The informant, Johnny Webb, told a Corsicana jury in 1992 that Mr. Willingham had confessed to setting the blaze that killed his three daughters.

The Innocence Project also alleges that the prosecutor withheld Mr. Webb’s subsequent recantation. The organization argues that those points, combined

with flawed fire science in the case, demand that the state correct and learn from the mistake it made by executing Mr. Willingham.

Former Judge John H. Jackson, the Navarro County prosecutor who tried Mr. Willingham, said the Innocence Project's claims were a "complete fabrication" and that he remained certain of Mr. Willingham's guilt.

"I've not lost any sleep over it," Mr. Jackson said.

Mr. Willingham was convicted, largely on the testimony of a state fire marshal, who said Mr. Willingham started the 1991 fire that killed his daughters. Several fire scientists, though, have concluded that the science underpinning that conclusion was faulty. In April 2011, the Texas Forensic Science Commission agreed.

Now, Mr. Scheck said, his organization has discovered that prosecutors went to great lengths to secure false testimony from Mr. Webb, to repay him for helping secure the conviction and to hide the recantation.

During the trial, Mr. Webb, who was in jail on an aggravated robbery charge, said he was not promised anything in return for testifying. But correspondence records indicate that prosecutors later worked to reduce his time in prison.

In a 1996 letter, Mr. Jackson told prison officials Mr. Webb's charge should be recorded as robbery, not aggravated robbery.

But in legal documents signed by Mr. Webb in 1992, he admitted robbing a woman at knife point and agreed to the aggravated robbery charge.



In letters to the parole division in 1996, the prosecutor's office also urged clemency for Mr. Webb, arguing that his 15-year sentence was excessive and that he was in danger from prison gang members because he had testified in the Willingham case.

In 2000, while he was incarcerated for another offense, Mr. Webb wrote a motion recanting his testimony, saying the prosecutor and other officials had forced him to lie.

That motion, Mr. Scheck said, was not seen by Mr. Willingham's lawyers until after the execution. Meanwhile, he said, prosecutors used the testimony to stymie efforts to prove Mr. Willingham's innocence and prevent his death.

An investigation is needed, Mr. Scheck said, to improve the judicial process.

Mr. Jackson said he made no promises to Mr. Webb. He also said Mr. Webb had sent him a letter explaining that the recantation motion was untruthful but that he was forced to submit it by prison gang members who supported Mr. Willingham.

"There's no doubt the arson report was based on archaic science, but from a practical standpoint I think the result was absolutely correct," Mr. Jackson said.

The Innocence Project has worked for years to exonerate Mr. Willingham, but Mr. Perry has argued that he was guilty.

Scott Henson, author of the criminal justice blog Grits for Breakfast, believes the current effort may be successful when a new governor takes office in 2015, he said.

Mr. Henson added, “Perry has made his position on the case pretty clear.”

*bgrissom@texastribune.org*

# **APPENDIX 42**

**AP**

## Cholesterol Study

[clinlife.com/High\\_Cholesterol](http://clinlife.com/High_Cholesterol)

Looking for People with Cardiovascular Disease. Learn more.



# The Big Story

## Group says new evidence in Texas arson-murder case

Feb. 28, 2014 6:20 PM EST

[Home](#) » [Cameron Todd Willingham](#) » Group says new evidence in Texas arson-murder case

FILE - In this Oct. 6, 2010, file photo, Scott Cobb, right, joins about 15 members of The Campaign to End the Death Penal at a protest before a hearing about the Cameron Todd Willingham case outside the Blackwell-Thurman Criminal Justice Center in Austin, Texas. The Innocence Project said Friday, Feb. 28, 2014, that newly discovered documents undermine the credibility of a key witness against Willingham who was controversially executed on Feb. 17, 2004. (AP Photo/Statesman.com, Jay Janner, File) MAGS OUT; INTERNET AND TV MUST CREDIT PHOTOGRAPHER AND STATESMAN.COM

- [Prev](#)
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AUSTIN, Texas (AP) — The Innocence Project argued Friday that newly discovered documents undermine the credibility of a key witness against a Texas man executed for the deaths of his three children based in part on arson evidence that has since been deemed faulty.

The New York-based nonprofit said it has discovered a handwritten note that suggests a prosecutor gave a lesser charge to jailhouse informant Johnny Webb, who testified that Cameron Todd Willingham told Webb he killed his daughters in 1991.

That would contradict claims made at trial by Webb and prosecutor John Jackson that Webb did not receive consideration for his testimony.

"It's astonishing that 10 years after Todd Willingham was executed we are still uncovering evidence showing what a grave injustice this case represents," Barry Scheck, the Innocence Project's co-director, said in a statement.

Willingham's case has been scrutinized by advocates who argue the state may have executed a wrongfully convicted man. Fire science experts already have refuted much of the methodology used in his case.

In a new filing Friday with the state pardon board, The Innocence Project said Jackson worked to have Webb's charge reduced from an aggravated offense with a deadly weapon to a second-degree felony. Included in the filing is a handwritten note, found in files turned over by current prosecutors, that mentions a second-degree robbery offense "based on coop in Willingham." The note is not signed or dated.

Jackson, a former prosecutor in Navarro County, south of Dallas, who later became a state district judge, has maintained that Webb did not receive leniency. He told The Associated Press on Friday that he had not seen the note, but believed it was likely referring to efforts he made to get Webb out of prison after Willingham's trial due to threats on Webb's safety.

"The file may certainly reflect that we tried to get sentencing shortened, but it had nothing to do with any agreement relative to the Willingham trial," Jackson said.

Jackson said imprisoned members of the Aryan Brotherhood had threatened Webb due to his role in Willingham's conviction.

"We certainly had an interest in not seeing a primary witness in the case killed while he was in prison," he said.

Lowell Thompson, the current Navarro County district attorney, confirmed the note was in the files he allowed the Innocence Project to inspect, but did not take a position on whether it indicated anything about the case.

"I've seen it, but I'm not familiar with anything it might mean or it might not mean," Thompson said Friday.

Webb, who currently is being held in the Navarro County Jail on an unrelated aggravated assault case, could not be reached for comment.

A fire destroyed Willingham's home in 1991 and killed his three daughters. A state fire marshal who studied the scene testified at Willingham's 1992 trial that the fire was arson.

Scientists have since refuted much of the methodology used by arson investigators before 1992, including the techniques used by the fire marshal in the Willingham fire. Attorneys submitted new scientific findings to Gov. Rick Perry in 2004 and asked for time to reopen the case, but Perry allowed Willingham's execution to go forward that year. Willingham maintained his innocence until his death.

The Innocence Project has called for a posthumous pardon, but Perry has long declined to reconsider Willingham's guilt,

calling him a "monster" who had killed his own children.

Lucy Nashed, a spokeswoman for Perry, said Friday that the governor's position has not changed.

"Todd Willingham was convicted and sentenced to death by a jury of his peers for murdering his three daughters, year-old twins and a two-year-old," Nashed said in an email. She added: "The governor agreed with the numerous state and federal courts that Willingham was guilty and the execution should proceed."

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## Tags

Rick Perry, Arson, Criminal punishment, Executions, Barry Scheck, Cameron Todd Willingham, Texas state government

## Comments

# **APPENDIX 43**



Bryce Benjet <bbenjet@innocenceproject.org>

---

## Question regarding Willingham case

1 message

---

**Bryce Benjet** <bbenjet@innocenceproject.org>

Wed, Feb 12, 2014 at 5:35 PM

To: Jhacksonpowell@gmail.com, Barry Scheck <bcsinnocence@gmail.com>

Judge Jackson:

Per a message left at your office by Barry Scheck, I am forwarding some documents for your review. These documents are from the Navarro County DA's files in the Willingham and Webb cases as well as the district court file in Webb's 1992 agg robbery conviction.

We would value the opportunity to speak with you about the case and these documents, and in particular, the handwritten note on page 4 of the pdf and the typewritten note on page 11.

Thanks for your attention to this matter.

Barry can be reached on his cell phone at 917 796-1150.

—  
Bryce Benjet  
Staff Attorney, Innocence Project  
40 Worth St., Suite 701  
New York, NY 10013  
(212) 364-5980  
(212) 364-5341 fax



---

**willingham.pdf**

946K





Bryce Benjet &lt;bbenjet@innocenceproject.org&gt;

---

**Re: Question regarding Willingham case**

1 message

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**Bryce Benjet** <bbenjet@innocenceproject.org>

Thu, Feb 13, 2014 at 3:58 PM

To: John Jackson &lt;Jhacksonpowell@gmail.com&gt;, Barry Scheck &lt;bcsinnocence@gmail.com&gt;

Judge Jackson:

Barry Scheck and I spoke to your assistant today who confirmed your receipt of the Willingham/Webb documents. We understand you are in Court today, but would value the opportunity to discuss these documents with you to make sure we understand them correctly. Please let us know when you are available to speak about this.

Thanks,

Bryce

On Wed, Feb 12, 2014 at 5:35 PM, Bryce Benjet <bbenjet@innocenceproject.org> wrote:

Judge Jackson:

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---

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(212) 364-5980  
(212) 364-5341 fax



Bryce Benjet &lt;bbenjet@innocenceproject.org&gt;

---

**Re: Question regarding Willingham case**

1 message

---

**John Jackson** <jhjacksonpowell@gmail.com>

Thu, Feb 13, 2014 at 6:38 PM

To: Bryce Benjet &lt;bbenjet@innocenceproject.org&gt;

Dear Mr. Benjet: please bring me up to speed relative to Mr. Scheck's and your involvement in the Willingham matter; particularly what relief you may be seeking now with any Court or administrative agency, and what you plan in the future. Full disclosure of your interest in the case is a predicate to my speaking with you. John H. Jackson

On Thu, Feb 13, 2014 at 2:58 PM, Bryce Benjet <bbenjet@innocenceproject.org> wrote:

Judge Jackson:

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---  
Bryce Benjet  
Staff Attorney, Innocence Project  
40 Worth St., Suite 701  
New York, NY 10013  
(212) 364-5980  
(212) 364-5341 fax

---  
Bryce Benjet

7/23/2014

Innocence Project, Inc Mail - Re: Question regarding Willingham case

Staff Attorney, Innocence Project  
40 Worth St., Suite 701  
New York, NY 10013  
(212) 364-5980  
(212) 364-5341 fax

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Bryce Benjet &lt;bbenjet@innocenceproject.org&gt;

**Re: Question regarding Willingham case**

1 message

**Bryce Benjet** <bbenjet@innocenceproject.org>

Thu, Feb 13, 2014 at 7:44 PM

To: John Jackson &lt;jhacksonpowell@gmail.com&gt;

Cc: Barry Scheck &lt;bcsinnocence@gmail.com&gt;

Dear Judge Jackson,

We represent Cameron Todd Willingham's family members, Eugenia Willingham and Patricia Cox. We have sought a posthumous pardon from the Board of Pardon and Parole. In the course of our investigation with respect to that application we discovered the documents we have passed on to you. We are seeking to get your understanding and interpretation of these documents and the events associated with them at your earliest convenience.

Thanks,

Bryce

On Feb 13, 2014 6:38 PM, "John Jackson" &lt;jhacksonpowell@gmail.com&gt; wrote:

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We would value the opportunity to speak with you about the case and these documents, and in particular, the handwritten note on page 4 of the pdf and the typewritten note on page 11.

Thanks for your attention to this matter.

Barry can be reached on his cell phone at 917 796-1150.

---  
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Staff Attorney, Innocence Project  
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(212) 364-5980  
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Bryce Benjet  
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Bryce Benjet &lt;bbenjet@innocenceproject.org&gt;

**Re: Question regarding Willingham case**

1 message

John Jackson &lt;jhacksonpowell@gmail.com&gt;

Fri, Feb 14, 2014 at 1:43 PM

To: Bryce Benjet &lt;bbenjet@innocenceproject.org&gt;

Mr. Benjet: Based on your response, it would appear that you and the Willingham family are prepared to waive any possible or anticipated civil claims against the State of Texas, other gov't entities, and anyone else in connection with this case. Please confirm and I may be able to provide responses to written questions. JJ

On Thu, Feb 13, 2014 at 6:44 PM, Bryce Benjet <bbenjet@innocenceproject.org> wrote:

Dear Judge Jackson,

We represent Cameron Todd Willingham's family members, Eugenia Willingham and Patricia Cox. We have sought a posthumous pardon from the Board of Pardon and Parole. In the course of our investigation with respect to that application we discovered the documents we have passed on to you. We are seeking to get your understanding and interpretation of these documents and the events associated with them at your earliest convenience.

Thanks,

Bryce

On Feb 13, 2014 6:38 PM, "John Jackson" <jhacksonpowell@gmail.com> wrote:

Dear Mr. Benjet: please bring me up to speed relative to Mr. Scheck's and your involvement in the Willingham matter; particularly what relief you may be seeking now with any Court or administrative agency, and what you plan in the future. Full disclosure of your interest in the case is a predicate to my speaking with you. John H. Jackson

On Thu, Feb 13, 2014 at 2:58 PM, Bryce Benjet <bbenjet@innocenceproject.org> wrote:

Judge Jackson:

Barry Scheck and I spoke to your assistant today who confirmed your receipt of the Willingham/Webb documents. We understand you are in Court today, but would value the opportunity to discuss these documents with you to make sure we understand them correctly. Please let us know when you are available to speak about this.

Thanks,

Bryce

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Judge Jackson:

Per a message left at your office by Barry Scheck, I am forwarding some documents for your review. These documents are from the Navarro County DA's files in the Willingham and Webb cases as well as the district court file in Webb's 1992 agg robbery conviction.



Bryce Benjet &lt;bbenjet@innocenceproject.org&gt;

## Questions regarding Willingham

1 message

Bryce Benjet &lt;bbenjet@innocenceproject.org&gt;

Mon, Feb 17, 2014 at 3:38 PM

To: John Jackson &lt;jhacksonpowell@gmail.com&gt;

Cc: Barry Scheck &lt;bcsinnocence@gmail.com&gt;

Bcc: "Greenberg, Danny" &lt;Daniel.Greenberg@srz.com&gt;, Gerry Goldstein &lt;ggandh@aol.com&gt;

Judge Jackson:

Thanks for your response on Friday. We have spoken to our client. As a preliminary matter, it has always been the Willingham family's primary goal to clear Todd Willingham's name in this matter, and not to seek financial gain. However, we have filed a petition for posthumous pardon with the Board of Pardons and Paroles which, if granted, could lay the predicate for statutory compensation for the Willingham family as was done in the Tim Cole case.

Further, without knowing your explanation of these documents, it is impossible for us to advise our clients to waive any remedy that may be available to them.

We find the documents that we have asked you to review troubling. The plain language of the handwritten note on the file in Johnny Webb's 1992 aggravated robbery case indicates a quid pro quo for his cooperation in the Willingham case. Other correspondence and documents likewise indicates that you provided substantial assistance to Mr. Webb beginning at least in October 1992 and continuing on through 2000. These documents appears on their face to be inconsistent with the trial testimony and others documents written by you indicating that Mr. Webb expected and received nothing in exchange for his cooperation.

Accordingly, we are interested in your explanation of these documents and the circumstances surrounding them. In particular we would like information regarding the following:

**1. The handwritten note on the Navarro County DA file in the Webb Agg. Robbery Prosecution (p.4 of the PDF)**

- a. Please identify who wrote the note and when the note was written.
- b. Explain the meaning of this note.

**2. The typewritten note found in the Navarro County District Clerk's file in the Webb Agg. Robbery case (p.11 of the PDF)**

- a. Please identify who wrote (or dictated) the note.
- b. Explain the meaning of this note.

**3. At trial, you elicited testimony from Johnny Webb that he was promised nothing in exchange for his testimony and that you told him that he would receive no assistance. (p. 9 of the PDF)**

- a. Was this testimony true?
- b. If it was true, please explain the following:

(i) the handwritten note indicating a reduction in charge based on "coop. in Willingham",

(ii) your advocacy on behalf of Webb with regard to prison conditions and classification, intercessions for parole, your role in seeking a commutation of Webb's sentence as "excessive", and your action in obtaining a nunc pro tunc amendment to Webb's judgment.

c. If the testimony was not true, please explain the following:

(i) your statements to the Parole Board in 1996 that Webb received no benefit for his testimony;

(ii) your statement to the Board of Pardons and Paroles in 2004 that Webb received no consideration for his testimony;

(iii) your 2010 affidavit claiming Webb received no reduction in punishment for his testimony; and

(iv) your 2013 statement to the Texas Tribune that you made no promises to Webb.

**4. At trial, Webb testified that he had been convicted of an "aggravated" offense--implying that he was convicted of aggravated robbery. (p10 of the PDF)**

a. Was this true?

b. If so, then please explain the following:

(i) the note dated October 1992 instructing the district clerk to inform TDC that the conviction was for simple robbery;

(ii) your actions in obtaining a nunc pro tunc amendment changing the conviction to second degree robbery;

Thanks for your anticipated cooperation in this matter.

Bryce Benjet

—  
Bryce Benjet  
Staff Attorney, Innocence Project  
40 Worth St., Suite 701  
New York, NY 10013  
(212) 364-5980  
(212) 364-5341 fax



# **APPENDIX 44**

**COMPLAINT**

No. 201309090012

THE STATE OF TEXAS

VS.

JOHNNY EVERETT WEBB  
712 N. 23<sup>rd</sup> Apt B  
Corsicana, Texas 75110

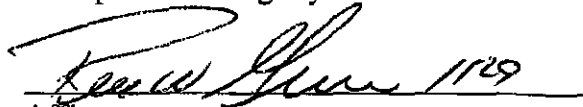
OFFENSE: AGGRAVATED ASSAULT

---

**In the Name and by the Authority of the State of Texas:**

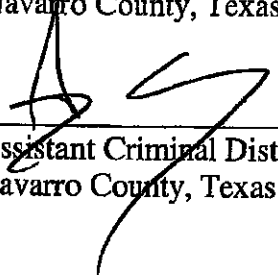
Before me, the undersigned authority, on this day personally appeared the undersigned affiant, who after being by me duly sworn, on his oath deposes and says JOHNNY EVERETT WEBB, hereinafter called Defendant, on or about the 17<sup>th</sup> day of August, A.D. 2013, and before the making and filing of this complaint, in the County of Navarro and State of Texas, did then and there intentionally, knowingly, or recklessly cause bodily injury to Billy Smith by cutting him, and the defendant did then and there use or exhibit a deadly weapon, to-wit: a knife, during the commission of said assault;

And it is further presented in and to said Court that, prior to the commission of the primary offense, on the 6<sup>th</sup> day of March, in 1992, in cause number 24490 in the 13<sup>th</sup> Judicial District Court of Navarro County, Texas, the defendant was convicted of the felony offense of Aggravated Robbery, against the peace and dignity of the State.

  
Affiant

Sworn to and subscribed before me on this, the 4<sup>th</sup> day of August, 2013.

R. Lowell Thompson  
Criminal District Attorney  
Navarro County, Texas

By:   
Assistant Criminal District Attorney  
Navarro County, Texas

# **APPENDIX 45**

# ROBERT HINTON & ASSOCIATES PC

4040 N. CENTRAL EXPWY., SUITE 810 • DALLAS, TEXAS 75204 • (214) 219-9300 • FAX (214) 219-9309 • E-MAIL: hinton.law@airmail.net

ROBERT C. HINTON, JR.

ATTORNEYS &  
COUNSELORS

## Affidavit of Robert Hinton

Before me, the undersigned Notary, personally appeared on individuals verified to me to be Robert Hinton, Attorney at Law, State Bar of Texas #09710800, who, upon being placed under oath, stated as follows:

"My name is Robert Hinton. I am a licensed attorney in Texas, since 1973." I make this affidavit freely, voluntarily and with personal knowledge of the matters asserted. Barry Scheck and his staff on several innocence projects I have assisted the last several years. Several months ago Barry Scheck and Bryce Benjet asked me if I would speak with a Dallas area lawyer named Bill Price concerning his activities with regard to the Willingham case while he was an assistant district attorney in Navarro County, Texas.

I called Bill Price, and after a brief conversation about why I was calling he and I scheduled a time for me to meet him at this office to discuss his work in the Willingham post-judgment case when he was working in the Navarro County D.A.'s office.

At that meeting I showed Bill Price copies of several items which had been provided me by Mr. Scheck and Mr. Benjet. Mr. Price told me that he was not aware of the 2004 letter John Jackson had sent to the Board of Pardons and Paroles opposing the application Skip Reaves had submitted to investigate prosecutorial misconduct in the Willingham case with respect to benefits provided to Johnny Webb after his testimony. Mr. Price told me that he was not aware that Mr. Jackson had caused Webb's conviction to be reduced from a first degree Aggravated Robbery to a second degree Robbery, by way of "nunc pro tunc" Order. Mr. Price told me that he was not aware of the notation on the District Attorney's file in the Webb case which stated that, per Webb's lawyer, April the conviction was to have been for an included 2<sup>nd</sup> degree Robbery based upon Webb's cooperation in the Willingham case. Mr. Price told me that if he had been aware of these things he would have disclosed them to Mr. Reeves and to the Court.

Mr. Price also told me that he attempted several times unsuccessfully to reach Stacy Kuykendall to verify the report that she had heard Willingham confess to the arson and murders a few days before his execution. Unable to reach Stacy Kuykendall, he included her brother Ronnie's statement in papers opposing Willingham's application for a stay, and a hearing, which included the Hurst report. Mr. Price expressed considerable surprise at the items I showed him, and indicated that had he been aware of them he would have recommended to his superior that Willingham's application not be opposed.

Shortly after my meeting with Mr. Price, I received a call from Dennis Biltz, Webb's current lawyer. Mr. Biltz told me that Webb wanted to talk to me about the truth about his testimony in the Willingham case. Kenneth Johnson, a private investigator, and I visited Webb

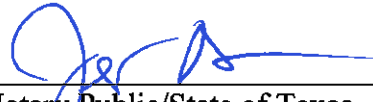
at the Navarro County Sheriff's office, in the presence of his attorney, Mr. Biltz. The interview was tape recorded. Attached is a true and correct transcript of this interview, which has not been altered, edited or manipulated in any way.

Signed this 25<sup>th</sup> day of July, 2014 by:



Robert Hinton

Sworn & Subscribed before me on this 25<sup>th</sup> day of July, 2014.



Notary Public/State of Texas  
County of Dallas



My Commission Expires.