

COURT OF COMMON PLEAS  
DAUPHIN COUNTY, PENNSYLVANIA

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|                               |   |                          |
|-------------------------------|---|--------------------------|
| Commonwealth of Pennsylvania, | : |                          |
|                               | : |                          |
| Respondent,                   | : | Docket Number            |
|                               | : | CP-22-CR-1544-1996       |
| v.                            | : |                          |
|                               | : | Honorable Todd A. Hoover |
| Lorenzo Johnson,              | : |                          |
|                               | : |                          |
| Petitioner.                   | : |                          |

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**SECOND SUPPLEMENT TO  
PETITION FOR RELIEF UNDER THE PENNSYLVANIA  
POST-CONVICTION RELIEF ACT, 42 PA. C. S. § 9541 ET SEQ.**

Michael Wiseman, Esq.  
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Post Office Box 120  
Swarthmore, Pennsylvania 19081  
215-450-0903  
Wiseman\_Law@Comcast.Net

Counsel for Petitioner  
Lorenzo Johnson

Dated: August 7, 2014  
Swarthmore, Pennsylvania

## PRELIMINARY STATEMENT AND RELEVANT PROCEDURAL HISTORY

1. Pending before the Court is Lorenzo Johnson's *Petition* under the Pennsylvania Post-Conviction Relief Act, filed on August 5, 2013. The *Petition* presents facts supporting Mr. Johnson's actual innocence and a variety of *Brady* violations and legal error that have permeated these proceedings. The *Petition* was supplemented on March 3, 2014.

2. The Commonwealth continues to investigate Petitioner's claims of actual innocence and violations of *Brady*. Petitioner also continues his own investigation. This *Second Supplement* presents eight pages of documents provided to Petitioner's counsel by the Commonwealth via e-mail on June 13, 2014 (hereafter *Eight Pages*).<sup>1</sup> It also addresses two new declarations provided to Petitioner. The *Eight Pages* are attached as Exhibit A. The two new declarations are attached as Exhibits B and C.

### SIGNIFICANCE OF THE EIGHT PAGES

3. The *Eight Pages* provided by the Attorney General are pages 1-8 of the Harrisburg Police Department computerized forms related to its ostensible investigation of the Tarajay Williams homicide. Because counsel does not fully understand the significance of all of the codes noted on the *Eight Pages* and because

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<sup>1</sup>The *Eight Pages* were provided by the Attorney General on the request of counsel, because pages 1-8 were missing from the file in the possession of counsel.

he does not have in his possession all of the documents cross-referenced in the *Eight Pages*, he cannot fully ascertain the significance of these documents.<sup>2</sup> However, he points out here the significance that he can discern.

4. Page 1 of the *Eight Pages* indicates that fingerprints were taken and that “a positive result” was obtained.<sup>3</sup> This is the first time that Petitioner and his current counsel were aware that there were fingerprints taken, or that a result was reached. Petitioner was told at that time of trial that there was no fingerprint evidence available. Obviously, without knowing the result of the testing, counsel cannot fully argue regarding the potential exculpatory nature of them.

5. Page 1 indicates that there was “no witness” to the killing. Obviously, this conflicts with the trial testimony of Carla Brown, who claims to have followed the victim, Petitioner and his co-defendant out of the bar to the alleyway, where Williams was shot dead.

6. Page 6 indicates that trial witness Carla Brown was a “suspect.” The

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<sup>2</sup>The file in counsel’s possession has passed through the hands of a number of attorneys, and accordingly it is far from complete. He has requested that the Attorney General provide him with a full copy of the discovery that should have been provided to trial counsel. Counsel would note that as of March 20, 2006 trial counsel did not have in her file these 8 pages. See Letter from Deanna Muller to Petitioner, attached as Exhibit D.

<sup>3</sup>Counsel has added his own *Bate-Stamp* page numbers to these documents.

basis for her being considered a suspect is currently not known to counsel and such basis does not appear in any document in counsel's possession. More significantly, Ms. Brown's status as a suspect was never brought to the attention of the jury. This strongly supports the inference that trial counsel was not aware of her designation as a suspect, which is of course also supported by the fact that as of 2006, these pages were not in her file. The designation of the prosecution's primary witness as a "suspect" has obvious implications for Petitioner's claim of actual innocence and violations of *Brady*.

#### **SIGNIFICANCE OF THE WENDY HARRIS DECLARATION**

7. Attached as Exhibit B is the declaration of Wendy Harris. This declaration was attached to a recently filed petition by Petitioner's co-defendant, Corey Walker.<sup>4</sup>

8. The implications are clear: Ms. Harris indicates – contrary to the trial testimony of Carla Brown – that there was no altercation in the bar, and that Petitioner was not present in the bar on the night in question.

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<sup>4</sup>The undersigned has never met or communicated with Mr. Walker. He does not represent him. Walker's recent Petition, along with the Harris declaration, was forwarded to the undersigned on June 25, 2014 by New York Attorney Rachel Wolkenstein. Counsel states as an officer of the Court that there has been no collusion with Walker in the production of his *Petition*, and that it was sent to counsel unsolicited by him, his agents or Petitioner.

## SIGNIFICANCE OF THE HAIRSTON DECLARATION

9. In his declaration, Mr. Hairston confirms that Petitioner was with him on a drug run to New York at the time of the killing. He also disputes the trial testimony of Vickie Doubs that she, Petitioner and Walker spent the night before the killing in his apartment. He also explains that he did not appear as a witness for Mr. Johnson at trial because the police falsely told him that Mr. Johnson was a witness against him.

## CONCLUSION

For all of the above reasons and for those set forth in the *Petition*, and *Supplement to the Petition*, and based on the entire record of this case, Lorenzo Johnson, seeks vacation of his conviction, and attendant relief requested in the *Petition*.

Respectfully Submitted,



Michael Wiseman  
PO Box 120  
Swarthmore, PA  
Wiseman\_Law@Comcast.Net  
215-450-0903  
Counsel for Petitioner  
Lorenzo Johnson

Dated: Swarthmore, PA  
August 7, 2014

**Certificate of Service**

I, Michael Wiseman, hereby certify that on this 7th day of August, 2014 I served a copy of the foregoing upon the following person in the manner indicated:

William R. Stoycos, Esq.  
Senior Deputy Attorney General  
Office of the Attorney General  
Appeals and Legal Services Section  
16<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120  
Email: [wstoycos@attorneygeneral.gov](mailto:wstoycos@attorneygeneral.gov)

A handwritten signature in black ink, appearing to read "Michael Wiseman", with a long horizontal flourish extending to the right.

Michael Wiseman

# **Exhibit A**

METRO THE HARRISBURG AREA POLICE INFORMATION RESOURCE SYSTEM (ICRIPINC)  
 PAGE: 1 07/20/07 KJG2 HP09  
 INC#: HBG 19951205915 DT, TM: 1995 12 15 0054 FRI TO:

-----  
 PUCR: 0110 STATUS: R DT CLEAR: 1996 03 30 JUV CLEAR: N DIST JUST: 12104  
 SYNOPSIS: HOMICIDE

BIAS MOTIV - ETHNIC: RELIG: RACIAL: SEXUAL:  
 CRIM SCENE SEARCHED: Y PRINTS TAKEN: Y BY: 149 LUCAS LEROY P  
 # OF OFFENDERS: UNK PHOTOS TAKEN: Y BY: 149 LUCAS LEROY P  
 WAS THERE A WITNESS.....: N  
 SUSPECT NAME OR GOOD DESCRIPTION.....: N  
 KNOWLEDGE OF SUSPECT LOCATION.....: N  
 DESCRIPTION WHICH IDENTIFIES VEHICLE USED BY SUSPECT.....: N  
 LIMITED OPPORTUNITY FOR SUSPECT TO COMMIT CRIME.....: Y  
 LIMITED NUMBER OF PERSONS AS POSSIBLE SUSPECTS.....: N  
 BELIEF THAT CRIME CAN BE SOLVED WITH REASONABLE INVESTIGATIVE EFFORT: Y  
 BELIEF THAT A MAJOR CRIME CAN BE SOLVED BY PUBLICITY.....: Y  
 PRESENCE OF SIGNIFICANT PHYSICAL EVIDENCE TO ID SUSPECT OR ACCUSED...: N  
 PROPERTY WITH CHARACTERISTICS, MARKS, NUMBERS THAT CAN BE TRACED.....: N  
 POSITIVE RESULTS FROM A CRIME SCENE EVIDENCE SEARCH FOR PRINTS.....: Y

MODUS OPERANDI: 110 111

| UCR          | INCIDENT-CRIME-CODES | DESCRIPTION         | #CT |
|--------------|----------------------|---------------------|-----|
| 0110 18 2501 | A                    | CRIMINAL HOMICIDE   | 1   |
| 2642 18 903  | A2                   | CR CONSP AID MURDER | 1   |

| NOFF | A/C | LOC | #PREM | SUSP-USE | CRIM-ACT | WEAP/FORC-USED | BIAS |
|------|-----|-----|-------|----------|----------|----------------|------|
| 09A  | C   | 13  | 00    | N        |          | 15 00 00       | 88   |
| 90Z  | C   | 13  | 00    | N        |          | 00 00 00       | 88   |



METRO THE HARRISBURG AREA POLICE INFORMATION RESOURCE SYSTEM (ICRIPINC)  
PAGE: 2 07/20/07 KJG2 HP09  
INC#: HBG 19951205915 DT, TM: 1995 12 15 0054

LAURA DAVIS RSA: 00

REPORTS: 02SP 08IC 12PR 13PR 14PR  
WITN CDS: 4 DJ, CRT APPEAR: 2  
DOB: SS#: RESIDENT STATUS: HISP: CUBN:  
ADDR: 123 WALNUT ST  
HBG PA 17101 PHONE: 717 255 3131  
EMPL: HBG POLICE BUREAU / OFFICER OCCUP:  
ADDR: SAME 00000 WRK HRS:  
PHONE: 000 000 0000  
OLN: WANT CHK:  
COMM:

JESSE A DAVIS RSA: BM 29

REPORTS: 04SP 12PR 13PR 14PR  
WITN CDS: 4 DJ, CRT APPEAR: 2  
DOB: 661117 SS#: 177524046 RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 27 HALL MANOR APT D  
HBG PA 17104 PHONE: 717 232 1158  
EMPL: NONE OCCUP:  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: 23659958 PA WANT CHK:  
COMM:

CLARK T GODUSKY RSA: 00

REPORTS: 03SP 12PR 13PR 14PR  
WITN CDS: 4 10 DJ, CRT APPEAR: 4  
DOB: SS#: RESIDENT STATUS: HISP: CUBN:  
ADDR: 123 WALNUT ST  
HARRISBURG PA 17101 PHONE: 717 255 3131  
EMPL: HBG BUREAU OF POLICE OCCUP:  
ADDR: WALNUT ST 00123 WRK HRS:  
HARRISBURG PA 17101 PHONE: 717 255 3131  
OLN: WANT CHK:  
COMM:

ERIN M DEWS RSA: BM 33

REPORTS: 02SP 12PR 13PR 14PR  
WITN CDS: 4 10 DJ, CRT APPEAR: 2  
DOB: 620612 SS#: RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 1422 MARKET ST  
HBG PA 17103 PHONE: 717 233 6676  
EMPL: VISIONS YOUTH WORKS OCCUP:  
ADDR: MARKET ST 01422 WRK HRS:  
HBG PA 17103 PHONE: 717 233 6676  
OLN: WANT CHK:  
COMM: MAILING ADDRESS P.O. BOX 5321, HBG PA 17010

METRO THE HARRISBURG AREA POLICE INFORMATION RESOURCE SYSTEM (ICRIPINC)  
PAGE: 3 07/20/07 KJG2 HP09  
INC#: HBG 19951205915 DT, TM: 1995 12 15 0054

DARRELL S WILLIAMS RSA: BM 35

REPORTS: 02SP 12PR 13PR 14PR  
WITN  
DOB: 591223 SS#: CDS: 4 10 DJ, CRT APPEAR: 2  
RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 2707 N 6TH ST  
HBG PA 17110 PHONE: 717 236 4263  
EMPL: VISIONS YOUTH WORKS OCCUP:  
ADDR: MARKET ST 01422 WRK HRS:  
HBG PA 17103 PHONE: 717 233 6676  
OLN: WANT CHK:  
COMM:

AXEL RODRIGUEZ RSA: WM 23

REPORTS: 02SP 12PR 13PR 14PR  
WITN  
DOB: 720809 SS#: CDS: 4 10 DJ, CRT APPEAR: 2  
RESIDENT STATUS: R HISP: H CUBN: N  
ADDR: 1422 MARKET ST  
HBG PA 17103 PHONE: 717 233 6676  
EMPL: NONE OCCUP:  
ADDR: 00000 WRK HRS:  
PHONE: 000 000 0000  
OLN: WANT CHK:  
COMM:

DWIGHT PAUL ROBERTS RSA: BM 23

REPORTS: 02SP 12PR 13PR 14PR  
WITN  
DOB: 720413 SS#: CDS: 4 10 DJ, CRT APPEAR: 2  
RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 1416 MARKET ST  
HBG PA 17103 PHONE: 999 999 9999  
EMPL: TODD GURAK OCCUP:  
ADDR: OBERLAND RD 01154 WRK HRS:  
HBG PA 99999 PHONE: 717 939 8221  
OLN: WANT CHK:  
COMM:

EVERLINA PETERSON RSA: UU 00

REPORTS: 07TV 12PR 13PR 14PR  
OWNR  
DOB: SS#: CDS: 5 DJ, CRT APPEAR:  
RESIDENT STATUS: U HISP: U CUBN: U  
ADDR: 1452 MUNN AVE  
HILLSIDE NJ 99999 PHONE: 999 999 9999  
EMPL: UNK OCCUP:  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: WANT CHK:  
COMM:

METRO THE HARRISBURG AREA POLICE INFORMATION RESOURCE SYSTEM (ICRIPINC)  
PAGE: 4 07/20/07 KJG2 HP09  
INC#: HBG 19951205915 DT, TM: 1995 12 15 0054

BEN HARRIS RSA: BM 20

REPORTS: 10SP 12PR 13PR 14PR  
SUSP ARREST#: CDS: 5 DJ, CRT APPEAR:  
C/F:  
DOB: 750813 SS#: RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 933 S 21ST ST HARRISBURG PA 99999 PHONE: 717 564 3581  
EMPL: UNK OCCUP:  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: WANT CHK:  
COMM:

ADRIAN D FLUELLEN RSA: BM 25

REPORTS: 11SP 12PR 13PR 14PR  
WITN CDS: 4 13 15 DJ, CRT APPEAR: 2  
DOB: 700710 SS#: 184544483 RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 1901 BELLEVIEW ROAD HARRISBURG PA 17104 PHONE: 717 234 8907  
EMPL: NONE OCCUP: UNEMPLOYED  
ADDR: HARRISBURG 00000 WRK HRS:  
PHONE: 717 999 9999  
OLN: WANT CHK:  
COMM:

BRIAN RAMSEY RSA: BM 27

REPORTS: 11SP 12PR 13PR 14PR  
WITN REPT-BY CDS: 4 11 13 DJ, CRT APPEAR: 2  
DOB: 681209 SS#: 203623672 RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 1276 MARKET STREET HARRISBURG PA 17103 PHONE: 717 238 3637  
EMPL: NONE OCCUP: UNEMPLOYED  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: WANT CHK:  
COMM: AKA BO ROCK; MOTHER ADDRESS 1836 HOLLY ST

SCOTT HOLLOWAY RSA: BM 24

REPORTS: 11SP 12PR 13PR 14PR  
SUSP REPT-BY CDS: 1 4 DJ, CRT APPEAR: 2  
ARREST#: C/F:  
DOB: 711011 SS#: RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 1708 MARKET STREET HARRISBURG PA 17103 PHONE: 717 999 9999  
EMPL: NONE OCCUP:  
ADDR: 00000 WRK HRS:  
PHONE: 000 000 0000  
OLN: WANT CHK:  
COMM:

METRO THE HARRISBURG AREA POLICE INFORMATION RESOURCE SYSTEM (ICRIPINC)  
PAGE: 5 07/20/07 KJG2 HP09  
INC#: HBG 19951205915 DT, TM: 1995 12 15 0054

JUAN T ADDISON RSA: BM 24  
-----  
REPORTS: 11SP 12PR 13PR 14PR  
SUSP REPT-BY CDS: 4 DJ, CRT APPEAR: 2  
ARREST#: C/F: DOB: 711119 SS#: RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 1452 MUNN AVENUE  
HILLSIDE NJ 8901 PHONE: 201 923 6442  
EMPL: NEWARK AIRPORT OCCUP:  
ADDR: 999999 09999 WRK HRS:  
NEWARK NJ 8901 PHONE: 201 999 9999  
OLN: WANT CHK:  
COMM: SKY-CAP NEWARK AIRPORT

JESSE A DAVIS RSA: BM 29  
-----  
REPORTS: 11SP 12PR 13PR 14PR  
WITN REPT-BY CDS: 4 13 DJ, CRT APPEAR: 2  
DOB: 661117 SS#: 177524046 RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 27 D HALL MANOR  
HARRISBURG PA 17104 PHONE: 717 232 1158  
EMPL: NONE OCCUP: UNEMPLOYED  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: WANT CHK:  
COMM:

TINA L DARDEN RSA: BF 32  
-----  
REPORTS: 11SP 12PR 13PR 14PR  
WITN CDS: 4 DJ, CRT APPEAR: 4  
DOB: 630617 SS#: RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 27 D HALL MANOR  
HARRISBURG PA 17104 PHONE: 717 232 1158  
EMPL: HOUSE REPRESENTATIVE OCCUP: OFFICE WORKER  
ADDR: SOUTH 00321 OFFICE BLDG WRK HRS:  
HARRISBURG PA 17120 2020 PHONE: 717 787 3542  
OLN: WANT CHK:  
COMM: LIVE-IN GIRLFRIEND OF JESSE DAVIS

TARAJA R WILLIAMS RSA: BM 24  
-----  
REPORTS: 08IC  
VICT CDS: 5 DJ, CRT APPEAR: 2  
DOB: 710115 SS#: RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 2007 FORSTER ST  
HARRISBURG PA 1710 4 PHONE: 717 238 4324  
EMPL: UNK OCCUP:  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: WANT CHK:  
VICTIM - CO-OP: Y TYP-INJ: O COND: D MED AID: N  
TAKEN TO: N NOTIFIED KIN: Y, COR: Y, DA: Y  
COMM: VICTIM DECEASED

METRO THE HARRISBURG AREA POLICE INFORMATION RESOURCE SYSTEM (ICRIPINC)  
PAGE: 6 07/20/07 KJG2 HP09  
INC#: HBG 19951205915 DT, TM: 1995 12 15 0054

ROBIN DENISE BLACKSTON RSA: BF 28

REPORTS: 08IC  
WITN REPT-BY CDS: 4 10 DJ, CRT APPEAR: 2  
DOB: 670427 SS#: 211546927 RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 125 SYLVAN TERRACE APT #3  
HARRISBURG PA 17104 PHONE: 717 232 0526  
EMPL: "NONE" OCCUP: UNEMPLOYED  
ADDR: 99999 99999 WRK HRS:  
HARRISBURG PA 17103 PHONE: 717 999 9999  
OLN: WANT CHK:  
COMM:

CARLA LANNETTE BROWN RSA: BF 26

REPORTS: 08IC  
SUSP REPT-BY CDS: 5 DJ, CRT APPEAR: 2  
ARREST#: C/F:  
DOB: 690115 SS#: RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 45 19TH STREET  
HARRISBURG PA 17103 PHONE: 717 233 0675  
EMPL: NONE OCCUP:  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: WANT CHK:  
COMM:

CARL D CLARK RSA: BM 47

REPORTS: 08IC  
WITN CDS: 5 DJ, CRT APPEAR: 2  
DOB: 480618 SS#: 175407004 RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 179 N 15TH STREET  
HARRISBURG PA 17103 PHONE: 717 233 0675  
EMPL: NONE OCCUP:  
ADDR: 00000 WRK HRS:  
PHONE: 000 000 0000  
OLN: WANT CHK:  
COMM:

COREY L WALKER RSA: BM 20

REPORTS: 17PC 18SP 22AR 23PR  
ACCU ARREST#: 406295 CDS: 1 DJ, CRT APPEAR:  
C/F: 127 2967  
DOB: 750625 SS#: 122586109 RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 245 S. 13TH ST 2ND FLR  
HARRISBURG PA 17104 PHONE: 717 999 9999  
EMPL: NONE OCCUP: UNEMPLOYED  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: WANT CHK: Y N 172 EDWARDS-KISSNERSHERRY L  
COMM:

METRO THE HARRISBURG AREA POLICE INFORMATION RESOURCE SYSTEM (ICRIPINC)  
PAGE: 7 07/20/07 KJG2 HP09  
INC#: HBG 19951205915 DT, TM: 1995 12 15 0054

-----  
LORENZO JOHNSON RSA: BM 22  
-----

REPORTS: 17PC 19AR  
CDS: 1 DJ, CRT APPEAR:  
ACCU ARREST#: 405945 C/F: 127 1675  
DOB: 731105 SS#: 103807362 RESIDENT STATUS: R HISP: N CUBN: N  
ADDR: 1809 ZARKER ST  
HARRISBURG PA 17103 PHONE: 717 232 6432  
EMPL: NONE OCCUP: UNEMPLOYED  
ADDR: 00000 WRK HRS:  
PHONE: 717 000 0000  
OLN: WANT CHK: Y N 172 EDWARDS-KISSNERSHERRY L  
COMM:

METRO THE HARRISBURG AREA POLICE INFORMATION RESOURCE SYSTEM (ICRIPINC)  
PAGE: 8 07/20/07 KJG2 HP09  
INC#: HBG 19951205915 DT, TM: 1995 12 15 0054

-----  
REPORT NO : 01 SP SUPPLEMENTAL STATUS: O  
-----

LOC, GRID: MARKET ST 01422 HARRISBURG PA 0511  
REPORT OFF: 99 ROBERT S ZGLENSKI 12/15/95 0127 PLAT: 1 SECT: P  
VEH INFO: INS, OUT: LIGHT: WEATHER: TEMP: F  
ASSIGN OFF: 00/00/00 DUE:  
APPROV OFF: 418 SHARON L CAPELLO 00/00/00  
CV HANDBK: PCCD V/W FORM: DOM RELAT FORM: EXT SIGNED DOC:  
SEC SURVEY: DEFERR PROSECUT: DA REQ FOR HEAR: STMT / CONFESS:  
ARREST(S): FURTHER ARRESTS: CRIM SUMMONS: WARRANT:  
FOLLOW UP: N REC ASSIGN TO: NCIC CRIM HIST: CITY PROP DAM:

RESPONDED TO 1422 MARKET STREET TO ASSIST OFFICER DAVIS FOR A SHOT FIRED WITH A DOWN PERSON. UPON ARRIVAL A B/M WAS FOUND LYING ON HIS LEFT SIDE WITH THE HEAD FACING MARKET STREET. THE VICTIM WAS IN THE WALKWAY BETWEEN 1420/1422 MARKET STREET. THE VICTIM DID NOT EXHIBIT ANY SIGNS OF LIFE.

UPON THE ARRIVAL OF THE AMBULANCE CREW, EMT KEVIN GORMAN CHECKED THE VICTIM FOR SIGNS OF LIFE. AT 0105 HRS GORMAN COULD NOT FIND A PULSE AND CANCELLED THE ASSISTING ALS UNIT. GORMAN THEN MOVED AWAY FROM THE VICTIM.

SUDDENLY, GORMAN RETURNED TO THE VICTIM AND STARTED TO CHECK THE AREA OF THE VICTIM'S HEAD. WHEN ASKED WHAT HE WAS DOING GORMAN STATED, "CHECKING TO SEE WHERE HE WAS SHOT." AS GORMAN WAS CONDUCTING THE CHECK HE REMOVED THE HOOD AND KNIT HAT FROM THE VICTIM. THIS OFFICER IMMEDIATELY COMMANDED GORMAN TO STOP. HE WAS TOLD IT IS THE CORONERS JOB TO DETERMINE WHERE HE WAS SHOT. GORMAN WAS THEN TOLD TO DEPART THE SCENE.

UPON FURTHER INVESTIGATION AT THE SCENE IT WAS NOTED THAT A GATE IN THE WALKWAY WAS CHAINED AND LOCKED. A WEAPON OF SOME TYPE WAS OBSERVED ON THE OTHER SIDE OF THE GATE. FOOTPRINTS MOVING AWAY (NORTHBOUND) COULD ALSO BE SEEN FROM THE PORCH OF 1420 MARKET.

FORENSICS ARRIVED AND BEGAN TO PROCESS THE SCENE.

## **Exhibit B**



Pursuant to Pa Code sec. 4904 and 28 U.S. Code sec. 1746,

I, Wendy Harris, declare the following under the penalty of perjury:

I am currently a resident of Harrisburg, PA. On the night of December 14-15, 1995, I was in Fab's bar (Midnight Special) when my friend Tarajay Williams was killed. I knew Tarajay Williams most of my life and went to school with him; he was a very nice guy.

At that time I lived in Hershey, PA and I was very tight with LaShawnyn Jackson. I often went to LaShawnyn's house in Harrisburg to get dressed for a night out. On the night Tarajay was killed I went to Fab's bar together with LaShawnyn and Corey Walker, who was known as "Rameek." We drove <sup>together</sup> from LaShawnyn's house in Rameek's car to Fab's. W/H

Rameek was dating LaShawnyn and I knew him and Rameek's friend Lorenzo Johnson, who was called "Cat." Rameek was one of the New York guys who sold drugs in Harrisburg and hung out in the Market street area.

We got to Fab's late in the evening and had drinks at the bar and spent time in the area near the dance floor. Tawana Poteat and some other friends were also there. We were pretty much together. To my knowledge and recollection, there was no fight or argument between Rameek and Tarajay while we were there. I don't remember Cat being there at all that night. Rameek was never told to leave the bar because of a fight. We were all just having a good time.

I've known Carla Brown <sup>most of</sup> my whole life. At the time she was addicted to crack. I <sup>W/H</sup> don't remember seeing her in Fab's that night.

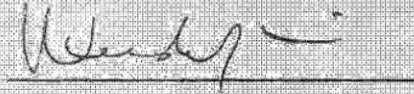
When we learned that Tarajay Williams had been killed I was together with Rameek and LaShawyn. I cried and LaShawyn and Rameek were also very upset. The bar was closed and when we went outside the bar, the police tape was already set up and police lights were flashing. After a few minutes standing with other people, <sup>I</sup> we <sup>W/H</sup> got left.

The trial and conviction of Corey Walker and Lorenzo Johnson didn't happen until 1997. At that time I had a lot of my own personal problems. No one from the police, the prosecution or defense lawyers spoke with me about the case. If they had I would have told them what I knew about who was in the bar that night and what happened there.

I've only recently learned that at the trial it was said that Rameek had an argument with Tarajay about money owed for a drug deal, around a couple of hundred dollars. And that Carla Brown testified that Rameek left Fab's with Tarajay, Cat and Carla Brown and went around the block and shot Tarajay with a shotgun. From being in Fab's at that time and from my knowledge of Rameek, that is not true. Rameek didn't fight with anyone over a couple of hundred dollars. He didn't use weapons. I also learned that ~~the~~ at the trial it was said that Rameek was carrying a shotgun that was used to kill <sup>W/H</sup> Tarajay and it was covered up with a long coat. That is ridiculous. Rameek never wore anything but short jackets. How could he have walked into and out of Fab's with a shotgun?

I still remember and miss Tarajay. I know his family. But from what I <sup>think</sup> know and <sup>with</sup> remember of that night, Tarajay Williams was not killed by Corey Walker and Lorenzo Johnson.

June 13 2014

A handwritten signature in cursive script, appearing to read "Wendy Harris", written over a horizontal line.

Wendy Harris

## **Exhibit C**

**DECLARATION OF DAVID HAIRSTON**  
**Pursuant to 28 U.S.C. §1746 & Pa. C.S. §4904**

I, DAVID HAIRSTON, currently residing in New York State, declare the following under penalty of perjury:

In 1995, I was selling drugs in the Harrisburg, PA area. I was from Yonkers, NY. I know both Corey Walker and Lorenzo Johnson from that time. I also know they were convicted of a December 15, 1995 murder in Harrisburg. I didn't know the victim, Tarajay Williams.

This declaration is to clear the false accusation I made in May 1996 that Corey Walker planned a hit on District Attorney John Cherry. That was a lie. I made up the story about the hit after I was repeatedly told <sup>by police officers</sup> that Corey Walker and "all of my gang" had turned on me and I was going to face drug charges that would send me to prison for life. The lie was in retaliation and the police, FBI and District Attorney appeared grateful to me.

I do not know where Corey Walker was when the murder happened, but I do know that Lorenzo Johnson was not in Harrisburg at that time. Late afternoon of December 14, 1995, I left on a drug buy trip to NYC in a car with Victoria Doubs and Suquan Ripply. Lorenzo Johnson, Cliff Germain and a woman called "Re Re" were in the other car that went with us. We traveled to NYC together and arrived late at night.

I remember that trip and the date because it was snowing that night and Lorenzo's car got stuck on the highway in the snow. Also, the next day, right after Lorenzo returned to Harrisburg, he and Suquan Ripply were arrested.

I was first arrested in Harrisburg in January 1995 after a raid on my apartment on 13<sup>th</sup> Street and charged with possession of cocaine with intent to deliver and faced several years in prison.

The police who raided the apartment were from the Community Attack on Narcotics Unit, the police tactical unit and the vice unit. Based on meetings with my attorney, Jerry Russo and the District Attorney on the case, the DA's office thought I was running a major cocaine drug gang planning on distributing some 100 kilos of cocaine and had access to \$250,000 cash.

In the spring, a few months after that arrest, I got a call on the cell phone I used for my drug business saying this was a call from the Attorney General's office and that by the end of the year we would all be locked up. I threw that phone away, thought a bit about leaving Harrisburg, but didn't. Instead, I continued drug dealing.

During that time I lived in Harrisburg with Donna Ripply who was also from Yonkers, but my Harrisburg girlfriend was Victoria Doubs.

Sometimes I took Victoria and others with me on trips to New York City to purchase drugs to be brought back and sold in Harrisburg. Vicky told me that she knew everyone in the drug trade in Harrisburg and could help me make connections. I

DA

soon learned that she was a serious crack-head and liar and later in 1995 I stopped my personal relationship with Vicky but still let her work for me.

I learned that Vicky tried to scam money from my mother, lying and saying that she was pregnant by me.

In December 1995 I lived in an apartment at 18<sup>th</sup> & Carnation in Harrisburg with Donna Ripply. Vicky didn't live in that apartment and she didn't sleep over because that was Donna's house.

I recently learned that Vicky testified that Corey Walker and Lorenzo Johnson spent the night before Tarajay Williams was killed with Victoria at an apartment at 18<sup>th</sup> & Carnation. That cannot be true. Corey and Lorenzo didn't spend the night at my apartment. Neither did Vicky.

In January 1996, I was in a motel on Susquehanna Highway with Donna Ripply Corey Walker and Suquan Ripply (Donna's nephew). Donna and I were having a personal argument and she picked up the phone and called the police and said, "If you want to pick up a drug dealer, come and get David Hairston." I called a friend to get me out of there right away and did. Before Corey, Suquan and Donna got away in their car, police caught them. Donna had drugs in her bag. Corey, Suquan and Donna were all charged with Manufacturing a Controlled Substance.

A month later, on February 22, 1996 I was arrested and charged with Conspiracy and Possession with Intent to sell. I was interrogated by Harrisburg police; the DA's office and an FBI agent participated. One time I was told that Corey Walker

and Lorenzo Johnson were sitting in the next cell and had talked, given statements and ready to testify at a trial against me. I was told that they could bring federal charges against me to send me to prison for life. I was promised that if I told them everything, including about Corey Walker, they wouldn't bring federal charges and I could make a deal on the Pa charges.

It was then I made the false accusation that Corey Walker planned a hit on District Attorney John Cherry.

In November 1996 I was charged in an eight count federal indictment, along with Corey Walker, on charges for conspiracy, sale and distribution of drugs and the use of firearms in drug sales. On November 14, 1997 I pled guilty to one count and was sentenced to 99 months in prison on the federal charges, concurrent with the state charges.

I wouldn't testify as an alibi witness for Lorenzo Johnson at trial for the murder of Tarajay Williams, although I knew he was in NYC at the time of the murder, because the police said Lorenzo was a witness against me on the drug charges.

I have spent the years since I was released from prison getting my life together. I am in a stable relationship; work a steady job and the proud father of young twins. My conscience has bothered me all these many years. I know that Lorenzo Johnson did not commit that murder. And based on everything I know about Corey Walker, he is also innocent.





I have never been questioned by lawyers for Corey Walker or Lorenzo Johnson about the false accusation I made against Corey Walker regarding DA John Cherry or the reasons that I would not testify to the <sup>fact</sup> ~~that~~ Lorenzo Johnson was in NYC with me and others when Tarajay Williams was murdered.

I am willing to come forward now because I have spent the past years living a drug and crime free life, taking care of my family. I cannot continue knowing that men who are innocent of a murder are spending their lives in prison.

I certify the facts set forth above are true and correct to the best of my personal knowledge, information and belief, subject to the penalty of perjury, pursuant to 28 U.S.C. §1746 & Pa. C.S. §4904.

Signature: Daniel Houston

Date: 7/14/14

## **Exhibit D**

**GEORGE F. SHULTZ**  
Chief Public Defender

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OFFICE OF  
**Public Defender**



**Dauphin County**

Dauphin County Administration Building  
Two South Second Street  
Harrisburg, Pennsylvania 17101

**FILE COPY**

March 20, 2006

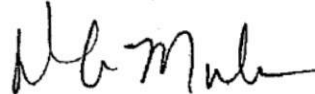
Lorenzo Johnson  
#DF-1036  
SCI- Fayette  
Box 999  
LaBelle, PA 15450-0999

Dear Mr. Johnson:

I am in receipt of your letter dated January 29, 2006. Enclosed are the photographs that you requested. After reviewing my file, I do not have the first eight (8) pages of the police report that you refer to. Also, Carla Brown did not make a written statement prior to trial.

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

Very truly yours,



Deanna A. Muller  
Assistant Public Defender

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Enclosures