

IN THE CRIMINAL COURT FOR ROCKY TOP COUNTY, STATE OF PADLAND

THE STATE OF PADLAND,)
)
)
 Plaintiff,)
)
 v.) Docket No. PL-1902-19
)
 JACK GRAY-LAMB,)
)
)
 Defendant.)
)

Drafted for the 2019 Phi Alpha Delta Pre-Law School Mock Trial National Competition

**OCTOBER 30 – NOVEMBER 3, 2019
ARLINGTON, VA**

**PROBLEM DRAFTED BY
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Introduction and Acknowledgments

Welcome to the 2019 Phi Alpha Delta Pre-Law Mock Trial Competition! This year's case materials were created by Brother Nicholas Lee, International Executive Board Member-at-Large. Mr. Lee is the founding member of Lee Criminal Defense, a law firm practicing primarily criminal and DUI defense law. Mr. Lee first became involved in mock trial as an undergraduate student at Middle Tennessee State University. While at MTSU, he competed for three years and was eventually promoted to Vice President of the organization and co-captain of the MTSU team that placed third in the nation in the silver division his senior year.

Mr. Lee attended the University of Tennessee for law school, where he participated in the National Trial Team and helped found the McReynolds Chapter trial team. Mr. Lee placed 2nd in the school-wide Jenkins Trial Competition and was named to Order of Barristers. He has also returned annually since graduation to help judge both the Jenkins Trial Competition and Advocate's Prize, the annual school wide appellate competition.

Since Mr. Lee's graduation from UT Law in 2011, he has served as a coach for the UT Law National Trial Team (Assistant Coach, 2011-14; Co Coach, 2014-Present). In 2016, Mr. Lee was honored to receive the UT Law Moot Court Board's annual Forrest W. Lacey Award for outstanding faculty contribution to the moot court program. In the same year Mr. Lee was allowed to begin drafting problems for our annual Phi Alpha Delta Law school trial competition. He is now honored to submit this year's case for our fraternity's use, and looks forward to serving as your case coordinator for this competition.

Immense gratitude goes out to **Jacquelyn Northcutt Mantooth** for her assistance in drafting this year's problem. Though not a member of Phi Alpha Delta or the legal community, Ms. Mantooth came to assist in drafting this problem through a Phi Alpha Delta connection. With her B.A. in Psychology and her Master's Degree in Clinical Mental Health Counseling, Ms. Mantooth helped greatly in assisting Mr. Lee in diagnosing Jack Gray-Lamb. If there is any misstatements in the expert testimony, that fault lies entirely with Mr. Lee.

Special thanks go to Sisters **Jessica Zaiken Sienkewicz** and **Nicole Winget**, and Brothers **Tim Gaskill**, **Alicia McMurray** and **Justin Roberts**. Each have contributed to this year's problem or preparation for competition in vast and varying ways, and their assistance is greatly appreciated. And great thanks to **Carl Eshbaugh**, mentor and friend, who constantly serves as a source of advice for these problems, year-after-year.

Last, but certainly not least, unending gratitude goes to our Executive Office for running this competition and doing all of the actual "work" associated with it. In particular, each competitor might have contact with **Andrew Sagan**, **Liz Dunlap** and **Emily Baranoski** while preparing for this competition – should the opportunity arise, please join in thanking them for their hard work and do whatever possible to make running this competition easier.

We hope that teams find the materials interesting and wish them the best of luck!

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PROBLEM QUESTIONS & CONTACT INFORMATION

Questions regarding these case materials should be **emailed to emily@pad.org**. This includes but is in no way limited to inquiries for clarification as to case law or governing statutes. Discretion will be exercised in deciding which questions, if any, are answered. Coaches and competitors shall not contact the Case Drafter directly with questions or to discuss the case. Questions regarding mock trial procedure, including any questions involving the Rules of Competition or Rules of Evidence, should also be directed to the Executive Office (E.O.).

Teams may begin submitting questions at any time. **The deadline for submitting questions is October 14, 2019.**

Please note that the captain's meeting will be **Wednesday October 30th, at 6 P.M. At least one member of your team MUST be present at the Captain's Meeting.**

The latest versions of the Federal Rules of Evidence and the Federal Rules of Criminal Procedure will govern the case and the trial unless the applicable law or case file states otherwise. The presiding judge will have the final determination on how motions, objections, and other matters are ruled.

2019 TEAM RULES

1. Each team must have four members. Each competing member must be a P.A.D. pre-law student member, initiated, and in good standing.
2. Additional members, such as coaches or alternates, must register separately. Alternate competitors are for emergency purposes in case an individual becomes unable to compete. Once the alternate takes the place of one of the four competitors, the replaced competitor will no longer be allowed to enter back into the competition. If you believe your team will need an alternate, please contact the Executive Office to discuss.
3. Each team shall maintain high standards of professionalism and ethics.
4. Any changes to the team roster must be sent to the Executive Office immediately.
5. Being under the influence of alcohol or a controlled substance while competing in a round is strictly prohibited. Teams violating this rule will be disqualified.
6. Each team will have the opportunity to present the case as both State's counsel and Defense during the competition's three rounds. Any additional round(s) will be chosen at random.
7. The judge will determine allowable communication between attorneys and witnesses/defendants during a round. Otherwise, communication between members of Phi Alpha Delta is allowed during the competition while not competing in a round, indeed encouraged (when not disallowed elsewhere in these rules) as fraternalism is a key

component of Phi Alpha Delta. However, and specifically, competitors may NOT communicate with coaches, alternates, or guests during a trial (including breaks).

8. No additional legal research is allowed into the trial.
9. All documents, witness statements, diagrams, signatures, and other materials found in the finalized case shall be deemed originals and authentic unless otherwise stated. Attorneys should have clean copies of all materials that will be presented to the witness or admitted as evidence.
10. Attorneys may only use the materials and exhibits provided in the case file. This rule does not prohibit demonstrative aides, but it does prohibit creating new exhibits.
11. Witness's shall testify to the facts that are contained in the evidence. However, on direct examination, a witness may draw reasonable inferences from the non-material facts of the case, such as personal background, as long as they do not enhance their position. Further, while witnesses are deemed to have testified to all relevant information, if questioned on cross examination about something not within the witness's statement, the witness may testify however (s)he chooses as long as it does not contradict something within the witness's statement. If a crossing attorney believes a witness has abused this discretion, the crossing attorney must handle such abuse through impeachment or impeachment by omission, as "outside the record" is not a valid objection.
12. At competition, each competitor must serve as a witness on one side and as an attorney on the other. For example, if a competitor is an attorney when the competitor's team is assigned prosecution, that same competitor must be a witness when the competitor's team is assigned defense (or vice versa). Violation of this rule will result in disqualification of that competitor from consideration for the top attorney and top witness awards, and could also result in point deductions and/or disqualification for the competitor's team.
13. Deference will be given to the presiding judge on how (s)he runs the courtroom according to the rules of the competition.
14. For every round, each attorney must be the presiding attorney for each of the following categories:
 - A. Opening or closing statement
 - B. Direct examination of one witness
 - C. Cross examination of one witness
15. Objections and responses must be made by the attorney on each team that is presiding over that particular portion of the trial.
16. Each team will have 65 minutes to present:
 - a. Opening statement and closing argument - 15 Minutes (combined)
 - b. Two direct examinations - 30 Minutes

c. Two cross-examinations - 20 Minutes

Each courtroom will have a designated time keeper whose calculations will govern. Pre-trial motions will not count towards the official time and the official time will stop to argue objections.

17. Each round is limited to no more than 2.5 hours of time. It will be the responsibility of the presiding judge to ensure that pre-trial motions and/or arguing objections do not extend a round past 2.5 hours of time. The ability of judges to give feedback will be determined by the expeditiousness of the overall trial.
18. The four teams who have won the most judges' ballots in the preliminary rounds will advance to the final rounds. In the event that two or more teams have won the same number of judges' ballots, the tie breaker will be that team(s) with the highest total points will advance to the final rounds.

Similarly, the winner of each final round will be determined by which team won more judges' ballots in the final round. In the event that both teams in a final round won the same number of judges' ballots, the tie breaker will be which team had the highest total points from the final round.

19. Teams are forbidden from watching other competitors in all *preliminary* rounds. If a school has registered multiple teams, this still applies. **Members of Team 1 may not watch members from Team 2 compete.** If a single coach is coaching multiple teams, that coach and the members are prohibited from sharing information relating to the team, theory, or presentation of competitors with members of other teams. Anybody not competing in the final rounds may observe either of the final rounds.
20. Video recording rounds is prohibited. Anyone who believes they need to video record a round must discuss the request and receive express written consent from the E.O..
21. So as not to force a competitor to "break character" if (s)he must refer to these rules in a trial, competitors shall refer to these rules as the "Local Rules" of the Court.
22. Any violations of these rules must be brought to the attention of the Case Coordinator or the designated E.O. staff member within 15 minutes of the completion of the trial. Should any issues arise, they will determine if a violation of the letter or intent of the rules has been made and determine what repercussions will result. Rules violations could result in repercussions including a warning, a point reduction, or disqualification.
23. While Federal Rule of Criminal Procedure 29 motions should be made and will be heard, such a motion will not be granted.
24. In the jurisdiction where this trial will take place, both direct examinations and cross examinations are open in spite of Federal Rule of Evidence 611. Any re-direct examination or re-cross examination, however, are closed.

25. As when practicing in real life in front of a judge with who you are not familiar, the skilled trial practitioner will not presume the judge knows the law and the facts of the case, nor that the judge does not know the law and the facts of the case. It is the job of the skilled trial practitioner to assess what laws and facts need be presented, and present them in a clear and compelling fashion. As such, competitors shall not lodge complaints that a judge does not know or misunderstands the law or facts of this case, and no such complaints will be heard.
26. Also as in real life, judges do not always rule as you think they should. This may happen with increased frequency in a mock trial, where judges may purposefully rule incorrectly to see how a competitor will handle the ruling. Competitors shall not complain as to a judge's ruling and no such complaint will be heard.

ADDITIONAL RULES MAY BE ADDED AT ANY TIME. TEAMS WILL BE NOTIFIED.

STATEMENT OF THE CASE

On September 10, 2018, a monstrous storm hit Rocky Top County, causing massive power outages throughout the area. Monroeville Mall in Rocky City was among the locations to lose power. During this power outage, a disturbance was reported at Monroeville Mall. Responding officers found the dead bodies of six people. It appeared that they had been beaten to death with a blunt object. Also found was Jack Gray-Lamb, a bloody baseball bat laid at Jack's feet.

Jack Gray-Lamb now stands trial accused of six counts of second degree murder. Jack Gray-Lamb has provided notice to the State and the Court that Jack Gray-Lamb will rely upon the affirmative defense of insanity.

Witnesses:

For the Prosecution:

1. Wichita Stone, eye-witness.
2. Dr. Ricki Grimes, psychologist.

For the Defense:

3. Jack Gray-Lamb, defendant.
4. Dr. Georgia Romero, psychologist.

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COMPLAINT AND INDICTMENT

SIX COUNTS:

Daniel Coffee, District Attorney for the 23rd Judicial District of the State of Padland, in the name and by the authority of the People of the State of Padland, informs the Court of the following offenses committed, or triable, in the City of Rocky City, County of Rocky Top, State of Padland.

COUNT 1: SECOND DEGREE MURDER

That on or about September 10, 2018, at or around 8:30 p.m., Jack Gray-Lamb did unlawfully and knowingly kill Maggie Cohan in violation of PCA § 39-13-210. This did occur at 200 Mall Circle Drive, City of Rocky City, County of Rocky Top, State of Padland.

COUNT 2: SECOND DEGREE MURDER

That on or about September 10, 2018, at or around 8:30 p.m., Jack Gray-Lamb did unlawfully and knowingly kill Carol McBride in violation of PCA § 39-13-210. This did occur at 200 Mall Circle Drive, City of Rocky City, County of Rocky Top, State of Padland.

COUNT 3: SECOND DEGREE MURDER

That on or about September 10, 2018, at or around 8:30 p.m., Jack Gray-Lamb did unlawfully and knowingly kill Liz Ashfield in violation of PCA § 39-13-210. This did occur at 200 Mall Circle Drive, City of Rocky City, County of Rocky Top, State of Padland.

COUNT 4: SECOND DEGREE MURDER

That on or about September 10, 2018, at or around 8:30 p.m., Jack Gray-Lamb did unlawfully and knowingly kill Shaun Pegg in violation of PCA § 39-13-210. This did occur at 200 Mall Circle Drive, City of Rocky City, County of Rocky Top, State of Padland.

COUNT 5: SECOND DEGREE MURDER

That on or about September 10, 2018, at or around 8:30 p.m., Jack Gray-Lamb did unlawfully and knowingly kill Ed Frost in violation of PCA § 39-13-210. This did occur at 200 Mall Circle Drive, City of Rocky City, County of Rocky Top, State of Padland.

COUNT 6: SECOND DEGREE MURDER

That on or about September 10, 2018, at or around 8:30 p.m., Jack Gray-Lamb did unlawfully and knowingly kill Columbus Eisenberg in violation of PCA § 39-13-210. This did occur at 200 Mall Circle Drive, City of Rocky City, County of Rocky Top, State of Padland.

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THE STATE OF PADLAND,)	
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Plaintiff,)	
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v.)	Docket No. PL-1902-19
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JACK GRAY-LAMB,)	
)	
Defendant.)	
)	

ORDER FOR DEPOSITION

This cause came to be heard on the 1st day of October, 2018, upon motion of the Plaintiff.
After a hearing in open court and for good cause shown, this court finds as follows:

1. That Officers George Wight and Harley Gray with the Rocky Top Sheriff's Officer were the officers that responded first on September 10, 2018, to the matters alleged in this case;
 2. That subsequent responding officers arrived after the defendant in this matter was taken into custody and therefore are not as well situated to be material witnesses in this matter;
 3. That Officer Harley Gray applied for and was granted an indefinite leave after the defendant in this matter was taken into custody;
 4. That efforts to contact Officer Harley Gray have failed;
 5. That Officer George Wight has recently been diagnosed with a terminal disease;
- and

6. That the preservation of Officer George Wight's testimony in this matter is necessary to ensure justice in this case.

Therefore it is ORDERED, ADJUDGED, and DECREED that the deposition of Officer George Wight be taken and preserved at the earliest convenience of the parties, this to occur no later than thirty (30) days after the entrance of this Order.

Entered, this 1st day of October, 2018.

Justin B.B. Roberts

The Honorable Justin B.B. Roberts
Rocky Top County Criminal Court

Approved for Entry:

Grant Hughes

Counsel for Mr. Jack Gray-Lamb

Daniel Coffee

Counsel for the Plaintiff

APPLICABLE LAW

PCA § 39-13-210. Second Degree Murder.

- (a) Second degree murder is a knowing killing of another.
- (b) Second degree murder is a Class A felony.

PCA § 39-11-501. Insanity.

- (a) It is an affirmative defense to prosecution that, at the time of the commission of the acts constituting the offense, the defendant, as a result of a severe mental disease or defect, was unable to appreciate the nature or wrongfulness of the defendant's acts. Mental disease or defect does not otherwise constitute a defense. The defendant has the burden of proving the defense of insanity by clear and convincing evidence.
- (b) As used in this section, mental disease or defect does not include any abnormality manifested only by repeated criminal or otherwise antisocial conduct.
- (c) No expert witness may testify as to whether the defendant was or was not insane as set forth in subsection (a). Such ultimate issue is a matter for the trier of fact alone.

PCA § 40-35-111. Authorized terms of imprisonment and fines for felonies.

- (a) The authorized terms of imprisonment and fines for felonies are:

[. . .]

(1) Class A felony, not less than fifteen (15) nor more than sixty (60) years. In addition, the jury may assess a fine not to exceed fifty thousand dollars (\$50,000), unless otherwise provided by statute;

[. . .]

State v. Morrison, 4 PAD 478 (Padland 1922):

In criminal cases in the state of Padland, the State shall bear the burden of proving each and every element of a charged offense beyond a reasonable doubt. “Beyond a reasonable doubt” does not mean beyond all doubt, or beyond imaginary or speculative doubt. Rather, a case is proven beyond a reasonable doubt if the juror is able to say with moral certainty that the defendant is guilty. “Beyond a reasonable doubt” is the highest burden of proof in our judicial system.

Zeke v. State, 4 PAD 479 (Padland 1922):

In criminal cases in the state of Padland, a party with a burden of proving a matter by a preponderance of the evidence must prove that matter to be more likely than not. However, a party with a burden of proving a matter by clear and convincing evidence must prove that matter true to a degree so that no substantial or serious doubt remains as to that matter’s veracity.

State v. Daisy, 7 PAD 893 (Padland 1929):

In criminal cases in the state of Padland involving the affirmative defense of insanity, citizens accused must provide pre-trial notice to the prosecuting attorney’s office and to the Court that Defense may raise the affirmative defense of insanity at trial. After providing such notice, Defense does not have to raise the affirmative defense at trial, but rather may elect at any time prior to the case’s first witness being called whether to raise the affirmative defense. Defense does have to notify the court and the prosecuting attorney prior to the case’s first

witness being called whether or not Defense will raise the affirmative defense of insanity, and failure to provide such notice shall be deemed an explicit waiver of the affirmative defense.

If Defense provides both appropriate notices and the prosecuting attorney has proven his *prima facie* case beyond a reasonable doubt, the burden of proof then shifts to the Defense to prove, by clear and convincing evidence, that his case is a case of insanity. However, if the prosecuting attorney does not meet his burden of proof, then the burden of proof never shifts to the Defense.

State v. Halperin, 8 PAD 693 (Padland 1931):

Homicide committed under insane delusion is excusable if, had defendant's delusions been fact, they would have excused defendant.

State v. Negan, 44 PAD 89 (Padland 2018):

Padland law prohibits an expert to testify whether a defendant was or was not legally "insane" at the time of the offense. This does not preclude an expert from testifying whether a defendant could have appreciated the nature or wrongfulness of his conduct at the time of the offense, or whether or not the defendant suffered from a severe mental disease or defect at the time of the offense.

Outside of this statement of applicable law, the most recent version of the Federal Rules of Evidence and the Federal Rules of Criminal Procedure govern this case and the mock trial competition. As stated in the rules, no additional legal research should be conducted.

STIPULATIONS

Procedural Stipulations

- 1) All objections regarding the Complaint and Indictment in this case have been heard and overruled. Said objections shall not be mentioned at trial, but are nevertheless preserved for appeal.
- 2) This trial shall be a bifurcated trial, with teams addressing solely the guilt-phase of the trial. No arguments nor mention of sentencing shall be entertained or allowed.
- 3) The order at trial will be pre-trial matters, pre-trial motions, prosecution's opening statement, defense's opening statement, prosecution's case-in-chief, defense's case-in-chief, prosecution's closing, defense's closing, and prosecution's rebuttal closing. Both parties must call both of their listed witnesses. Prosecution will only be allowed rebuttal closing if they requested so prior to beginning their main closing argument.
- 4) All witnesses called to testify have already been constructively sworn in.
- 5) For each witness, direct and redirect will be allowed, as well as cross and recross, but no further examination beyond that. Padland has open cross examination, but closed redirect and recross examinations.

- 6) “Beyond the record” is not a valid objection. Rather, attorneys are to address any inferences made from the case materials in examinations and via impeachment when necessary.
- 7) All exhibits in the file are authentic, and each exhibit in this case is deemed to be the original unless otherwise stated.
- 8) If any party requests the rule of sequestration, it shall be constructively enforced. However, no individual will be actually sequestered from the room.
- 9) All stipulations, both procedural and substantive, have been approved by the Court at a pretrial hearing and may not be amended or waived. Parties may stipulate to further matters, but not insofar that it may contradict these pretrial stipulations.
- 10) Defense counsel has sufficiently notified prosecuting counsel and the court to satisfy State v. Daisy, 7 PAD 893 (Padland 1929). Additionally, defense counsel has provided notice to the prosecutors and this court that defense will be arguing the affirmative defense of insanity at trial. Accordingly, state’s counsel will be permitted to provide testimony and evidence on the subject of insanity during state’s counsel’s case-in-chief.
- 14) The Criminal Records of Wichita Stone and Jack Gray-Lamb are true and accurate certified copies.
- 15) Any objections to the testimony in the deposition of Officer George Wight have been reserved for trial. This was the agreement prior to the deposition and so counsel’s failure to object at the deposition is not a waiver of an objection.
- 16) As defense counsel has given appropriate notice that they will rely upon the affirmative defense of insanity at trial, and as state’s counsel may go into insanity in their case in chief, state’s counsel may also go into insanity in their opening statement. However, this is not a waiver of defendant’s constitutional rights – state’s counsel may not inappropriately shift the burden of proof and may not violate the defendant’s right to remain silent.

Substantive Stipulations

- 1) Officer George Wight of the Rocky Top Sheriff’s Office passed away prior to trial.
- 2) No objection will be made to the admittance of the Medical Examiner’s Report regarding Maggie Cohan. If the Medical Examiner were called to testify, the Medical Examiner would testify that the death of Maggie Cohan was caused by injuries consistent with being struck multiple times by a blunt object.
- 3) No objection will be made to the admittance of the Medical Examiner’s Report regarding Carol McBride. If the Medical Examiner were called to testify, the Medical Examiner

would testify that the death of Carol McBride was caused by injuries consistent with being struck multiple times by a blunt object.

- 4) No objection will be made to the admittance of the Medical Examiner's Report regarding Liz Ashfield. If the Medical Examiner were called to testify, the Medical Examiner would testify that the death of Liz Ashfield was caused by injuries consistent with being struck multiple times by a blunt object.
- 5) No objection will be made to the admittance of the Medical Examiner's Report regarding Shaun Pegg. If the Medical Examiner were called to testify, the Medical Examiner would testify that the death of Shaun Pegg was caused by injuries consistent with being struck multiple times by a blunt object.
- 6) No objection will be made to the admittance of the Medical Examiner's Report regarding Ed Frost. If the Medical Examiner were called to testify, the Medical Examiner would testify that the death of Ed Frost was caused by injuries consistent with being struck multiple times by a blunt object.
- 7) No objection will be made to the admittance of the Medical Examiner's Report regarding Columbus Eisenberg. If the Medical Examiner were called to testify, the Medical Examiner would testify that the death of Columbus Eisenberg was caused by injuries consistent with being struck multiple times by a blunt object.
- 8) The six bodies found by Officer George Wight and Officer Harley Gray at the Monroeville Mall on September 10, 2018 are the bodies of Maggie Cohan, Carol McBride, Liz Ashfield, Shaun Pegg, Ed Frost, and Columbus Eisenberg. All six bodies were transported to Padland General Hospital. All six were pronounced dead on arrival.
- 9) Following a pre-trial hearing held on June 26, 2019, this Honorable Court found Dr. Ricki Grimes to be an expert in the field of psychology. Accordingly, Dr. Ricki Grimes will be allowed to give expert testimony in the field of psychology at this trial and no objection to such expertise will be entertained.
- 10) Following a pre-trial hearing held on June 26, 2019, this Honorable Court found Dr. Georgia Romero to be an expert in the field of psychology. Accordingly, Dr. Georgia Romero will be allowed to give expert testimony in the field of psychology at this trial and no objection to such expertise will be entertained."

STATEMENT OF JACK GRAY-LAMB

Given October 15, 2018

1 My name is Jack Gray-Lamb. I understand that I am being charged with killing
2 multiple people. I understand I have the constitutional right to remain silent but wish to
3 waive that right and testify in my own defense.

4 September 10, 2018 started off simple enough. It was a Monday. I'm a minor
5 league baseball player, that's what I do for a living. I play for the Padland Panthers, and
6 we were winding down our season. We had our championship game the next week, so
7 we had practice that morning and took the rest of the day off. After practice, I grabbed
8 lunch, a movie, and then headed back to my place for a nap. When I woke up I had
9 dinner, then decided to head to the mall to spend the evening.

10 The Monroeville Mall, that's the only mall close to town. You have to drive a bit
11 to get there, and it started storming on my drive out there. By the time I got there, it was
12 pouring down rain, you could hear thunder once or twice a minute. Horrendous winds,
13 branches were getting blown clean off from trees. I rushed to seek refuge in the mall.

14 When I ran into the mall, it was pretty empty. I remember my head hurting,
15 wishing I had something to take for the pain. I stumbled to a nearby chair, where I
16 collapsed. I may have passed out. When I came to, all the power was out. You could
17 still hear the storm raging outside though, so I decided to hunker down instead of risking
18 going back out into the weather.

19 Next thing I know I'm in the sports store, can't remember how I got there. I was
20 in the baseball section. It was very dark, you couldn't see even across the room very
21 well. My head was still pounding, you could hear the storm roaring outside, and that's
22 when the impossible happened.

1 How do I put this? You know all those zombie movies you saw growing up? Or
2 all those bath salt “zombies” that were in the news? Well I look up and there was a
3 bonafide zombie coming at me! I grabbed a bat and remembered from the movies that
4 you have to take out the brain or they just keep coming at you. So I grabbed that bat and
5 let a rip, straight across that zombie’s temple. She dropped. I looked at her, she must
6 have been one of the store employees. Her name tag read “Maggie.” I felt bad for
7 Maggie.

8 I looked around for help but didn’t dare call out in case there were more. I started
9 making my way carefully toward the exit, and there was another store employee zombie.
10 This one was howling something horrendous. It looked at its friend on the floor, then to
11 me. I didn’t wait for it to try to bite me, I squared up and swung away again. I didn’t get
12 a clean hit and had to hit this one multiple times. Finally, I was content that it was dead.
13 This one’s tag read “Carol.” I’m sorry Carol, it was you or me.

14 At this point, I had no idea what was going on. I was freaking out a little. A
15 legitimate zombie apocalypse? I remember thinking to myself that I had to get out of
16 there. I made my way to the exit of the sporting goods store without getting attacked
17 again.

18 Monroeville Mall was still deserted. You could hear the storm howling outside. I
19 wouldn’t normally want to go out into that weather, but better to risk my chances out
20 there than inside with these monsters. At that moment it struck me that I should call 911,
21 followed closely by the realization that I had left my phone in the car. Ok, time for a
22 plan. Make it out of the mall, preferably without running into any more of those zombie-
23 monsters. Get to the car. Call the police. Simple enough plan.

1 I grabbed the baseball bat and started along one wall of Monroeville Mall. I got
2 halfway to the exit when, out of one of the stores, came three more zombies! The one
3 closest to me was female, she went down first. As I was taking out the female, the male
4 behind her ran to tackle me and we went to the ground. I was able to smack him across
5 the nose with the bat hard, knocking him aside. At that point, his quite heavier friend was
6 running at me. I took out that one with a well-placed blow with the bat and then made
7 sure to finish all of them off.

8 I had almost made it to the mall's exit when I ran across another zombie, this one
9 running after a person. A real person, not a zombie! I had to save that person.

10 I chased after the two and caught up pretty quickly. I was able to hit the zombie
11 in the back with my bat and down he went. The person looked back at us, screaming. I
12 yelled to get outside and hide somewhere safe. While my attention was distracted, the
13 zombie had gotten back up and tackled me. This one took longer than the rest, but finally
14 I was able to finish this one off too. The person I had rescued was nowhere to be found,
15 must have listened to me and hid somewhere outside.

16 I made it out of the mall and back to my car. I called 911, letting them know
17 everything that had happened. They told me to stay put and I did. I put the bat on the
18 ground, easy to reach, and waited. I don't recall how long I waited, I guess I zoned out.
19 The next thing I remember there were emergency vehicles everywhere, emergency lights,
20 and someone was knocking on the window. I rolled the window down and just stared
21 blankly at the police officer. The officer was saying something, but all I could hear was a
22 deafening ringing.

23 Then I was able to hear the officer. "Jack, it's me. It's me, it's Harley Gray. I

1 need you to give me the bat and come with me.” So I did, I gave the officer the bat. I
2 don’t know why, next thing I know my hands are being cuffed behind my back! At first I
3 thought to fight, but one of my parents used to be a police officer, I knew better than to
4 fight the police. I cooperated and they put me in the back of a squad car.

5 While I was waiting in the back of that squad car, the storm passed. Next thing I
6 know, Officer Gray comes over with another officer. The other officer Mirandized me,
7 then asked if I’d answer some questions. I told them that of course I would. Then
8 Officer Gray asked me why I did it. Asked why I had killed all those people. I told
9 Officer Gray that I hadn’t killed anyone! I told Officer Gray everything I just told you,
10 about the zombies, how I had even saved someone! I don’t know why the officers
11 wouldn’t believe me!

12 Anyways, they arrested me and I’ve been in custody ever since, awaiting this trial.
13 For the first day or two I kept seeing zombies but the police strapped me down, saying
14 there were no zombies. Two different psychiatrists have come out to see me. First was
15 Dr. Ricki Grimes. Dr. Grimes met with me for a while, then prescribed me some
16 medication. The prison guards made me take the medication, and I don’t know why but
17 it helped me feel better. I’ve been taking the medication ever since.

18 A few weeks later another psychologist came to see me. This one’s name was Dr.
19 Georgia Romero. I’ve met with both Doctors multiple times since. I always try my
20 hardest to be helpful and tell the truth.

21 The really hard part though is that everyone keeps telling me what I know
22 happened didn’t really happen. They said there never were any zombies, that all the
23 responding officers found when they entered the mall was a number of dead people. Oh,

1 and that person I saved, apparently their name is Wichita Stone. Now I don't know what
2 to believe.

3 Also, I don't see how it is important, but I've been asked to tell the truth about
4 some of my history, so I guess I'll do that here.

5 Growing up, one of my parents abused me pretty badly. Would beat me
6 something furious for even "existing too loudly." Eventually my parents got divorced. I
7 ran away from home shortly after. I finished high school while staying on a friend's
8 couch, but that's the only good thing I did. I see one parent every now and then, the other
9 is totally out of my life. I started drinking and doing drugs, couldn't keep a job. And I
10 racked up a juvenile record. Then a week after turning eighteen I broke into a church and
11 stole some stuff. I pawned it and used the money for drugs. Needless to say I got caught.
12 I plead guilty and remember at the sentencing hearing my attorney arguing that I should
13 receive treatment, that I had addiction problems maybe indicating psychological issues.
14 She argued that they should treat the problem, not just send me to jail where I'd serve
15 time, get out, and the underlying problem wouldn't be treated. But the prosecutor
16 pointed out that the state had cut funding for such treatment and that I didn't have
17 insurance. The judge sentenced me, I sat in jail for maybe a year.

18 But after I got out, I set to prove my attorney wrong. I stayed on the straight and
19 narrow, only had a few relapses. Try real hard not to use drugs. Got back into shape,
20 tried out for the minor league team, and made it. I thought I had things together pretty
21 good too, but then all this happened.

STATEMENT OF WICHITA STONE

Given September 17, 2018

1 I am Wichita Stone. I live here in Rocky City, Padland, where I work as an EMT.
2 That's an emergency medical technician. I've been doing that for a little under a decade
3 and yes, I'm up-to-date on all my training. I'm also recently single – I was married to
4 Columbus Eisenberg, before the Monroeville Mall Massacre of September 10, 2018.
5 Columbus and I were both there that day, and I have been asked to give any testimony I
6 think might be relevant in prosecuting Jack Gray-Lamb for all of the murders that day.

7 So, September 10, 2018. Columbus and I had been fighting that day because
8 Columbus wouldn't stop Rickrolling me. But after Columbus eventually apologized, we
9 went out for dinner at Monroeville Mall. After dinner, we caught a talking picture. Then
10 we just walked around the mall, stopping in a store here and there. Columbus put on
11 some headphones and was listening to my Walkman, I was fooling around with my
12 Tamagotchi.

13 One of the stores we stopped in that night was the local sports store in the mall.
14 After we were in there for a moment, I remember Columbus wanting to check out the
15 baseball section so we headed that way. We didn't get quite there. We stopped maybe
16 20 feet away when Columbus recognized Jack Gray-Lamb, who was perusing the
17 baseball section. Columbus and I go to a lot of minor league baseball games in the area,
18 so Jack Gray-Lamb was something of a minor celebrity to us.

19 Then, to our horror, we saw Jack Gray-Lamb calmly pick up a baseball bat, ask a
20 store employee about it, and when the store employee turned to check on something for
21 Jack, Jack swung the bat at the store associate's head. Then Jack swung again. And
22 again. Columbus and I were in shock, there was this local celebrity just calmly ending

1 this person's life, not a trace of emotion or remorse on Jack's face.

2 Well needless to say Columbus and I crouched down and hid, no idea what to do.
3 We watched as Jack looked around the store, saw another store associate, walked calmly
4 up to this second one, and started swinging away again. It was horrible.

5 At this point Columbus and I were still hiding but saw Jack head for the store's
6 exit into the rest of the mall. Jack walked out and, after a little bit, Columbus and I
7 decided we needed to get out of there. I know, we should have called the cops. This
8 whole Monroeville Mall Massacre has been the talk of the town, everyone asks why we
9 didn't call the cops. All I can say is I guess we were in shock, or we didn't want to draw
10 Jack's attention. But honestly? It just didn't cross our minds. At first we were in shock,
11 then we thought we should get to safety.

12 So Columbus and I make it to the sporting store's exit and there was Jack, a
13 couple stores down, swinging away at three people. All three of them were on the
14 ground, none of them moving as Jack swung and swung again. Still not a drop of remorse
15 on Jack's face. The closest exit was past Jack, but we didn't dare go that way. We
16 started heading the other way, trying to get away from Jack. That's when Jack saw us.
17 That's when Jack started running after us. That's when Columbus yelled for me to get
18 out of there. That's when Jack killed Columbus.

19 I should have stayed, I should have helped. But I didn't. I hid. I watched. I
20 survived.

21 Eventually no one else was in sight. There was Jack, then there was me hiding.
22 Jack looked around and, not seeing anyone else, said "now who is existing too loudly?"
23 Then Jack took the bat, walked to the other end of the mall, and I couldn't see Jack

1 anymore.

2 I have no idea how long I hid there, too afraid to move. But after a while I
3 realized Jack hadn't come back and that's when I thought to call 911. I reported what I'd
4 seen and, once the shock wore off, I thought that I should go check on the victims while I
5 waited for emergency personnel to arrive.

6 I first went to the trio that Jack Gray-Lamb had murdered. None of their vital
7 signs were good, all three of them were already gone. Plus they were out in the open and
8 I didn't want to stay in the open where Jack Gray-Lamb could find me if Jack came back,
9 so I made my way to the sports store to check on the other two.

10 The two in the sports store seemed to have been employees there, they were
11 wearing name tags. The first one Jack Gray-Lamb had dispatched had a name tag that
12 read "Maggie," the second one's name tag read "Carol." I checked Maggie for vital signs
13 too – Maggie was dead. But when I checked Carol, she wasn't entirely dead yet. I
14 treated her best as I could, but the damage was too extensive. I have no idea how long I
15 was trying, but Carol was gone by the time police and other EMTs arrived.

16 Carol was dead but I was still performing CPR on her when emergency personnel
17 arrived. I knew she was dead, but if I stopped working on Carol, then I'd have to go
18 check on Columbus. Anyways, I didn't have to because emergency personnel arrived
19 before I finished with Carol. But they were dead, they were all dead. Columbus too.

20 I utilized all my training and appropriate procedures when dealing with each of
21 these people, in assessing whether they were alive or dead, and in treating Carol. And I
22 can say with certainty that I did not exacerbate Carol's injuries, despite the rumors going
23 around in the neighborhood. She was just already too far gone by the time I had gotten to

1 her.

2 Also, I am told there is a chance I'll need to testify as to what I saw on that day.
3 If that's the case, I should acknowledge that I do have a criminal history. It is mostly
4 crimes accrued during my year's as an activist.

5 Finally, the news stations are reporting that Jack Gray-Lamb may suffer from
6 depression. As someone who suffers from depression and anxiety, I feel for Jack Gray-
7 Lamb in those regards. As much as you can feel sympathy for someone that killed the
8 love of your life. But fortunately I caught mine early and am mostly ok as long as I stay
9 on my medication and continue my therapy sessions. I know there is a stigma
10 surrounding this stuff, even today. There shouldn't be, that stigma prevents too many
11 people from getting help. I don't forgive Jack Gray-Lamb, but if the Monroeville Mall
12 Massacre was caused because the system only wanted to punish Jack Gray-Lamb but not
13 treat him, well that would be very unfortunate.

STATEMENT OF DR. GEORGIA ROMERO

Given October 30, 2018

1 My name is Georgia Romero. I was born and raised right here in Padland, over in
2 Hub City. Have lived here my entire life, except for when I have had to travel for work
3 or school. Proud resident of our great state of Padland.

4 My profession is and has always been psychiatry. I have brought my curriculum
5 vitae which summarizes some of my history, I left out my many publications and awards
6 to save time. The short summary is that I worked hard and went to the best schools,
7 entered the psychiatric field as something of a young prodigy. Those were the days.
8 Now I've been in the field of psychiatry for around 30 years.

9 I began my career doubling as a professor of psychiatry and as a clinical
10 psychiatrist. With the former I helped teach future generations of psychiatrist and
11 doctors, with the latter I had the privilege of working hands on with psychiatric cases and
12 studies. This meant everything from treating psychiatric patients to helping develop and
13 apply new drugs or procedures. The "young years," they seem just yesterday.

14 After the young years I had the unexpected honor to be tapped to be the next
15 Chief of Psychiatry at Padland General Hospital. Youngest in history, to anyone's
16 recollection who I could ask. As Chief of Psychiatry, I was in charge of the
17 administration of psychiatry at Padland General Hospital and was responsible for those
18 who I supervised, but it was so much more. I was the person tasked with looking at the
19 bigger picture, making sure our department was running efficiently and optimally,
20 making sure we were heading in the right direction for the future. Needless to say this
21 was more than a full-time job, so I had to drop my jobs and responsibilities elsewhere,
22 both teaching and being a clinical psychiatrist.

1 Those years, me as Chief of Psychiatry, I like to call those years the “golden
2 years.” While I wasn’t the one with “boots on the ground” treating patients, I oversaw all
3 of those at Padland General Hospital that did. I got to mentor the future of the
4 profession, mold these psychiatrists and medical health professionals to become the best
5 they could be. I had the privilege of doing this for many a year, up until a few years ago
6 when I and the hospital administration agreed that it was time for me to step down and
7 once again groom someone to be the future of our profession, this time to groom my
8 successor as Chief of Psychiatry. Together we selected Dr. Gumbi Winget, and I know
9 the program is in good hands.

10 Since then I have thrown my hat in with a local psychiatric group. My
11 contributions, other than serving as a senior member of the group to mentor those in
12 need, is that I travel as a guest lecturer and consult on cases. I’ve had the honor of
13 travelling all over providing lectures on Psychiatry and related fields. And now I can say
14 that it is my honor to consult in this high-profile case.

15 I first became aware of this case when Jack Gray-Lamb’s attorneys approached
16 me asking if I could assess the case. Primarily I was tasked with determining if Jack
17 Gray-Lamb was insane at the time that the “Monroeville Mall Massacre” is said to have
18 occurred. Additional concerns would be working up a general mental health profile for
19 Jack Gray-Lamb and assess to ensure that Jack Gray-Lamb’s mental health needs were
20 being taken care of while in custody, pharmacologically and otherwise. In Padland, it
21 costs around one-hundred and fifty to two hundred dollars an hour to retain a Psychiatric
22 expert, maybe double that for time spent in court and giving testimony. But mind you,
23 that’s an average. Jack Gray-Lamb’s attorneys balked when I informed them my fee

1 would be five-hundred dollars an hour to retain me for a case such as this, triple that for
2 time spent in court and giving testimony. However, it is my opinion that you need to be
3 willing to pay for the best on a case such as this, and obviously the attorneys agreed as
4 here I sit.

5 And so it was that I set out to see what help, if any, Jack Gray-Lamb required.
6 My first step was to familiarize myself with the case. I requested that Jack Gray-Lamb's
7 attorneys provide me with a packet of things, and I reviewed everything that they
8 provided to me. Specifically I reviewed the sworn statements of Jack Gray-Lamb,
9 Wichita Stone, and Officer George Wight. I also reviewed the criminal records of Jack
10 Gray-Lamb and of Wichita Stone.

11 Next, I set about arranging and conducting the necessary interviews to assist me
12 in coming to my conclusion in this case. First I spoke via telephone with Dr. Ricki
13 Grimes to ascertain what work Dr. Grimes had done on Jack Gray-Lamb's case and to
14 see if Dr. Grimes had arrived at any conclusions. Next, I scheduled a visit with Jack
15 Gray-Lamb, at which I also was able to review the medical file they had on Jack Gray-
16 Lamb which included many notes by Dr. Grimes. I then set up an appointment to meet
17 with Wichita Stone, who was kind enough to meet with me. Finally, after all of this, I
18 was able to reach my conclusions in this matter. I intend to continue meeting with Jack
19 Gray-Lamb on a monthly basis, both to ensure medical needs are being met and to further
20 monitor matters. I understand I have a duty to amend this statement if anything material
21 should change, in my expert opinion or otherwise, and I will do so if necessary.

22 Here I will state my expert opinion of Jack Gray-Lamb, and then give the
23 reasoning.

1 At the time of the Monroeville Mall Massacre, Jack Gray-Lamb was insane.
2 Specifically, Jack Gray-Lamb suffered a brief psychotic disorder causing hallucinations.
3 This made Jack unable to appreciate the nature or wrongfulness of what Jack did. And
4 contrasting with delusions, where Jack Gray-Lamb would have visually seen regular
5 people but believe them to be zombies, hallucinations are where Jack Gray-Lamb
6 actually visually saw zombies. To be clear, I am not saying that zombies were actually
7 present. However, in Jack Gray-Lamb's mind, they were, which entirely explains the
8 behavior on the day in question.

9 For a patient to be diagnosed with a Brief Psychotic Disorder, the patient had to
10 suffer from delusions, hallucinations, disorganized speech, or grossly disorganized
11 behavior. Only one of these symptoms need be present and, as stated above, Jack did not
12 suffer from delusions but rather suffered from hallucinations. The episode must last from
13 between one day and one month and, based upon my interviews with Jack, it is my belief
14 that Jack suffered an episode closer to one day in length. Jack would not have still been
15 suffering from the episode when Dr. Ricki Grimes first met Jack, but Jack erratic
16 behavior, unwillingness to have contact with individuals, and Jack's statements to me
17 after that day indicate to me that Jack continued to see zombies while in custody for at
18 least around a day. And finally, for a patient to be diagnosed with Brief Psychotic
19 Disorder, the disturbance cannot be better explained by another listed disorder. In this
20 case I understand Dr. Ricki Grimes believes this all better explained by Major Depressive
21 Disorder, but I entirely disagree. Depression does not cause someone to go on a killing
22 spree. But hallucinations that zombies are after you and you must defend yourself? That
23 is far more consistent with the case we have here.

1 However, as a professional courtesy to Dr. Grimes, I discussed the possibility of a
2 Major Depressive Disorder diagnosis. Mind you, that was in a purely academic fashion.
3 I explained that a diagnosis of Major Depressive Disorder could not be made when a
4 diagnosis of a Brief Psychotic Disorder better explained the circumstances, and therefore
5 a diagnosis of Major Depressive Disorder was not possible. However, if it were Major
6 Depressive Disorder, for the sake of argument, you could not discount the hallucinations.
7 That if it were Major Depressive Disorder, again for the sake of argument, it would have
8 to be a diagnosis of Major Depressive Disorder with Psychotic Features. And as for
9 Suicidal Tendencies, Jack never told me of any past suicide attempts and did not present
10 to me as suicidal in any of our interactions. I don't see how Dr. Grimes could disagree
11 with me on all of this.

12 I have become aware that Dr. Grimes then set to criticize me on a number of
13 things, things easily explainable if Dr. Grimes had the benefit of my extensive
14 experience.

15 First, yes, I did administer a SASSI, meaning a Substance Abuse Subtle Screening
16 Inventory. The result was that Jack presented as a high risk of having an addiction issue.
17 This, combined with Jack's past abuses, troubled childhood, and past criminal history
18 which should have resulted in Jack receiving treatment that Jack never received, highly
19 troubled me. It is true that by the time that I interviewed Jack, Jack would have had time
20 to sober out from most substances people abuse. However, an experienced psychiatrist
21 meeting with Jack shortly after the Monroeville Mall Massacre would have seen all these
22 warning signs and ordered a blood draw of Jack to determine what, if any, drugs and
23 substances Jack was on during the Monroeville Mall Massacre. However, this was not

1 done in Jack’s case. It would have been highly important if Jack had been on a substance
2 explaining or even causing Jack’s behavior, which could have changed Jack’s psychiatric
3 diagnosis. Now we will never know.

4 And yes, I did use the PBCAT, the Psychologically Based Credibility Assessment
5 Tool. I agree with Dr. Grimes that it is not always accurate in telling when someone is
6 telling the truth or lying, but it is far better than using nothing at all. The PBCAT has you
7 read certain body language and behavior to see if someone is lying. Points are assigned
8 for certain behaviors such as rate of speech, rate of breath, pursed lips, etc., and if
9 someone racks up too many points, it is an indicator that you should suspect someone is
10 lying. However, utilizing both the PBCAT and my experience in my field, I did not
11 suspect Jack of lying to me. And yes, I recognize that Ignatius Pippen, Rey Potter, and
12 Thorin Thistlewhite, experts in their fields, attack the PBCAT in “The Psychologically
13 Based Credibility Assessment Tool (PBCAT): A Closer Look,” but I still think using it is
14 better than using nothing at all. And I should add that I used the PBCAT when
15 interviewing Wichita Stone too – result was that one might be lying.

16 Finally, I understand that Dr. Grimes is criticizing me because Dr. Grimes claims
17 I only saw Jack after the medication Dr. Grimes prescribed had time to kick in. This is
18 not entirely true. I saw Jack in the period where the medication may or may not have had
19 time to kick in. Certainly I have seen improvements in Jack after our initial meeting,
20 indicating to me that the medication had not yet kicked in. However, this would only be
21 a concern with a junior member of our profession, not someone as experienced as me. I
22 simultaneously interviewed Jack as if the medication had not yet kicked in, had taken full
23 effect, and was in the process of taking effect. My diagnosis remains unchanged.

- 1 End of the day, who are you going to believe? A world-renowned expert
- 2 psychiatrist such as myself or a small-time local psychiatrist?

STATEMENT OF DR. RICKI GRIMES

Given November 11, 2018

1 I am Dr. Ricki Grimes. I live here in Rocky City, Padland, and am the
2 “government psychiatrist” in the area – I’m the one brought in when local government or
3 police need a psychiatrist to look at something, such as in today’s case. I have brought in
4 my curriculum vitae that outlines my qualifications and certify that it is correct.
5 Testimony in my field of expertise is needed in court on average a few times a year,
6 which I am happy to give. I can also proudly say that my expert testimony has always
7 been accepted, never denied.

8 First, I do acknowledge that my route to becoming a psychiatrist is unusual from
9 most. As you can see from my CV, I didn’t go the normal civilian route of becoming a
10 psychiatrist but rather joined the Navy and utilized the opportunities I found there to
11 further my schooling and become a psychiatrist, all while serving my country. Granted, I
12 haven’t spent my career in academia or writing articles on psychiatry, though I have
13 nothing against those who do. Rather, I have spent my career working hands-on, boots-
14 on-the-ground. This gives me a different perspective than most psychiatrists – just
15 different, not any better or any worse necessarily. After a full and successful naval
16 career, I retired at the rank of Lieutenant Commander and am receiving full retirement
17 benefits. As I already mentioned, I now spend my time as a civilian psychiatrist.

18 I have been asked to give my expert testimony in regard to the Jack Gray-Lamb
19 case, which has been dubbed in local news outlets as the Monroeville Mall Massacre. I
20 was the psychiatrist that initially interviewed and treated Jack Gray-Lamb once Gray-
21 Lamb was taken into custody and have continued to be Gray-Lamb’s primary care
22 provider for psychiatric needs to present day. This means that I periodically meet with

1 Gray-Lamb to ensure Gray-Lamb is receiving adequate treatment and medication, and
2 alter Gray-Lamb's treatment and medication if necessary.

3 I first met with Gray-Lamb on September 12, 2018. That initial interview lasted
4 about half an hour, at which point I diagnosed Jack Gray-Lamb as suffering from Major
5 Depressive Disorder, possibly with suicidal tendencies. To diagnose a patient with Major
6 Depressive Disorder, five or more of a list of certain symptoms must be present during
7 the same 2-week period, and this behavior must be a derivation from the norm.

8 Additionally, one of those five symptoms must be the patient suffering from a depressed
9 mood or the patient's loss of interest or pleasure. In Gray-Lamb's case, Gray-Lamb
10 suffered from both of these first two symptoms, and additionally suffered from insomnia,
11 fatigue, and a feeling of worthlessness. Gray-Lamb reported suffering from each of these
12 symptoms pretty much every day for a couple of weeks prior to meeting with me.

13 My diagnosis that Gray-Lamb had suicidal tendencies came based upon Gray-
14 Lamb telling me that Gray-Lamb had been having suicidal thoughts and then threatening
15 to commit suicide while incarcerated, which caused us to put Gray-Lamb on suicide
16 watch, as well as Gray-Lamb admitting to already having attempted to take Gray-Lamb's
17 life once when 14 and once when 18. There is already a suicide risk with those suffering
18 from a Major Depressive Disorder, but these threats and admissions caused me to
19 diagnose suicidal tendencies and have Gray-Lamb placed under suicide watch.

20 Once I had diagnosed, I prescribed Gray-Lamb Paracetamol for pain and
21 Duloxetine, a Serotonin-norepinephrine Reuptake Inhibitor, or SNRI, for depression.

22 In the following weeks I continued to monitor Gray-Lamb with weekly visits,
23 usually on Wednesdays as that's when I have usual office hours and I enjoy getting to

1 wear my purple lab clothing. Within a few weeks, the medications improved Gray-
2 Lamb's mental condition as evidenced by daily nurses' notes as well as my regular
3 interaction with Gray-Lamb. I also requested and reviewed the statements of Wichita
4 Stone, Officer George Wight, and Dr. Georgia Romero. The purpose of this was to
5 ensure I had all the information as I continued to treat Gray-Lamb. Everything I
6 reviewed confirmed my initial diagnosis of Major Depressive Disorder. Major
7 Depressive Disorder is the best diagnosis based upon my experience on this case and
8 expertise in this field.

9 It is my diagnosis to a reasonable degree of certainty within my field of expertise
10 that Jack Gray-Lamb suffered a Major Depressive Disorder with Suicidal Tendencies.
11 None of this would have made Jack Gray-Lamb "legally insane" at the time of the
12 Monroeville Mall Massacre, as I understand the legal criteria for insanity under Padland
13 law. To be clear, I do believe Gray-Lamb suffered from Major Depressive Disorder with
14 Suicidal Tendencies, but that would not have depreciated Gray-Lamb's ability to
15 appreciate the nature and wrongfulness of Gray-Lamb's conduct during the Monroeville
16 Mall Massacre. Further, in my experience with this case and expertise in my field, I have
17 come across nothing that makes me believe Gray-Lamb actually suffered hallucinations
18 that zombies were present or attacking. Rather, based upon the evidence, in part on the
19 statement of Wichita Stone which contradicts Gray-Lamb's version of what occurred, it
20 seems to me as likely, if not more likely, that Gray-Lamb is lying entirely about the
21 hallucinations. This concern is exacerbated by how clearly Gray-Lamb recounts the
22 events that Gray-Lamb wants us to believe occurred during a psychotic break. Why
23 would Gray-Lamb do that? Your guess is as good as mine. Could just be trying to cover

1 up for what Gray-Lamb did, maybe Gray-Lamb was attempting to commit suicide-by-cop
2 that day and couldn't go through with it (that would at least be explainable by Gray-
3 Lamb's suicidal tendencies).

4 Finally, I was asked to review Dr. Romero's statement and conclusions, to
5 comment upon them and to explain how they change my conclusions, if at all. In short,
6 they do not.

7 Dr. Romero did not meet with Gray-Lamb until weeks after the "Monroeville
8 Mall Massacre," which was also weeks after I had prescribed that Gray-Lamb be given
9 Paracetamol and Duloxetine. By the point that Dr. Romero first saw Gray-Lamb, Gray-
10 Lamb's mental state had greatly improved and this would horrendously skew Dr.
11 Romero's results. At this point, Dr. Romero would only be able to attempt a diagnosis
12 based upon a criminal defendant's statements, where that person was then already
13 properly medicated and could fully appreciate that they were facing significant jail time.

14 I understand that Dr. Romero administered a test called the Substance Abuse
15 Subtle Screening Inventory, or "SASSI." However, I fail to see how this test could be
16 relevant in Gray-Lamb's case, other than running up the billable hours Dr. Romero spent
17 on the case. The SASSI is a test designed to determine whether someone is at a low,
18 medium, or high risk of having a substance abuse problem (a result of "no risk" is not
19 possible). However, someone could be entirely sober and receive a "high risk" result or
20 vice versa. Granted, if Gray-Lamb had appeared to me at the initial interview, or to
21 officers at the arrest, as being under the influence of a substance causing Gray-Lamb's
22 behavior on the day in question, that could be relevant. However, Gray-Lamb did not
23 appear to anyone as such. Whether or not Gray-Lamb suffers from a substance abuse

1 problem does not and should not affect a psychiatric expert opinion in this case.

2 I additionally understand that Dr. Romero administered another test called the
3 Psychologically Based Credibility Assessment Tool, or “PBCAT.” To say that the
4 PBCAT is an accurate test would be ludicrous. It is less reliable than a polygraph test,
5 claiming it can magically determine if someone is telling the truth or not based upon
6 observations of the person giving statements.

7 No, what we should talk about is Dr. Romero’s diagnosis. It is my understanding
8 that Dr. Romero has diagnosed Gray-Lamb as having suffered from a brief psychotic
9 disorder causing hallucinations. I disagree with this diagnosis.

10 For a diagnosis of a Brief Psychotic Disorder, the patient would have to be
11 suffering from delusions, hallucinations, disorganized speech, or grossly disorganized
12 behavior. This episode would have to last at least 1 day but no more than a month, and
13 the disturbance cannot be better explained by another diagnosis, such as a major
14 depressive disorder. I admit that more than a day had lapsed between the events at the
15 mall and when I interviewed Gray-Lamb, however it is my understanding that the
16 deceased in the mall were the only people Gray-Lamb reported as having seen as
17 “zombies,” which would have been only an episode of an hour or two at most, not
18 meeting the one day minimum requirement. Additionally, Gray-Lamb’s behavior was
19 better explained by having suffered a Major Depressive Disorder with Suicidal
20 Tendencies.

21 Then, during my conversation with Dr. Romero and after I stated my initial
22 diagnosis had been major depressive disorder, Dr. Romero countered that even if it were
23 Major Depressive Disorder, it would have to be Major Depressive Disorder with

1 Psychotic Features. At this point it seemed Dr. Romero was back-pedaling, attempting to
2 find a diagnosis that would make the client happy as opposed to objectively reviewing the
3 case, but out of professional courtesy I discussed this possibility as well. We both agreed
4 with Major Depressive Disorder, so the diverging opinion came on whether Gray-Lamb
5 suffered from Psychotic Features. Dr. Romero insisted that Gray-Lamb had hallucinated
6 and seen zombies, that it all lined up with what the witness testimony said, and that
7 equaled Psychotic Features. I told Dr. Romero what I have stated above, there is nothing
8 other than Gray-Lamb's insistence of having seen zombies that Gray-Lamb hallucinated
9 at all, that it was as likely, if not more, that Gray-Lamb was inventing zombies to avoid
10 the consequences of what had happened.

11 I should say, as Dr. Romero would have to admit to as well, that Psychiatry is not
12 a one-hundred percent precise field. It is not like you are taking a liquid sample and can
13 conduct scientific tests to determine the exact chemical makeup of the liquid. Rather,
14 you have to familiarize yourself with a case and see what diagnosis best fits the case
15 presented to you. Differing symptoms, length of symptoms or episodes, whether a
16 symptom or episode could be better explained by another diagnosis, medical condition, or
17 drugs being present, all of these could change a diagnosis. But, at the end of the day,
18 Major Depressive Disorder with Suicidal Tendencies best fits Jack Gray-Lamb's case.
19 Zombies are just made up, as much in the real world as in Gray-Lamb's case and Gray-
20 Lamb's head on the day in question.

EXHIBIT LIST

Photograph of baseball bat

Curriculum Vitae of Dr. Ricki Grimes

Curriculum Vitae of Dr. Georgia Romero

Medical Examiner's Report – Maggie Cohan

Medical Examiner's Report – Carol McBride

Medical Examiner's Report – Liz Ashfield

Medical Examiner's Report – Shaun Pegg

Medical Examiner's Report – Ed Frost

Medical Examiner's Report – Columbus Eisenberg

Arrest Report

Deposition of Officer George Wight

Criminal Record of Wichita Stone

Criminal Record of Jack Gray Lamb

“The Psychologically Based Credibility Assessment Tool (PBCAT): A Closer Look”



DR. RICKI GRIMES

EXPERIENCE

Private Practice – Rocky City, Padland

MARCH 2018 – PRESENT

- Providing full spectrum mental health assessment and treatment.
- Prescribing and monitoring medications to treat mental health concerns as appropriate.
- Primary psychiatrist retained by Rocky Top Sheriff Office and other local government offices.

United States Navy – *Clinical Psychiatrist (O-4)*

JULY 2007 – FEBRUARY 2018

- Deployment to Afghanistan with a focus on front line treatment of operational units.
- Stateside support to Veterans Affairs clinics with a focus on post-traumatic stress disorder treatment.
- Provided mental health and suicide prevention training to Naval units.
- Prescribed and monitored medications to treat mental health concerns.

United States Navy – *Hospital Corpsman (HM) (E-5)*

JUNE 1996 – JUNE 2007

- Naval Operations Support Center:
 - Duties included administering immunizations, maintaining medical equipment, and conducting preliminary physical examinations.
- Emergency Department:
 - Provided emergency medical care and support in combat support hospitals.
- Training Lead:
 - Trained new HM's in all rules, regulations, and methodology.
 - Provided mental health and suicide prevention training to Naval units.

EDUCATION

MD in Clinical Psychiatry

American University

AUGUST 2002 – MAY 2007

Dissertation:

Complex Trauma in Combat: Initial Clinical Presentation and Treatment Response

Bachelors of Psychology

American Military University

APRIL 1997 – MAY 2002

Education, Continued

Naval Hospital Corpsman School

DECEMBER 1996 - MARCH 1997

FORT SAM HOUSTON, TX

LICENSES

- State of Padland License to independently practice as a clinical psychiatrist.
- State of Virginia License to independently practice as a clinical psychiatrist.

AWARDS

- Naval Achievement Medal (Gold Star in Lieu of Additional Award) - 2012
- Joint Service Commendation Medal - 2014

GEORGIA ROMERO, M.D.

439 Hospice Way
Hub City, PD 75308
555-444-3333

Georgia.Romero@HubCityPsych.com

EDUCATION

- 1988 Residency in Psychiatry, *Harvard University*
- 1984 Doctor of Medicine, *Johns Hopkins University School of Medicine*
- 1980 B.S., Triple Major in Biology, Chemistry, and Physics, *Padland University*

EMPLOYMENT

- | | |
|--------------------------|---|
| May 2015-Present | Hub City Psychiatric
<i>Consultant, Guest Lecturer</i> |
| January 2000-May 2015 | Padland General Hospital
<i>Chief of Psychiatry</i> |
| August 1994-January 2000 | Padland University
<i>Full Professor of Psychiatry – Tenured</i> |
| August 1988-January 2000 | Padland General Hospital
<i>Clinical Psychiatrist</i> |
| August 1988-July 1994 | Padland University
<i>Associate Professor of Psychiatry</i> |

LICENSURE / BOARD CERTIFICATION

- | | |
|--------------|--|
| 1988-Present | Padland State Medical License |
| 1988-Present | American Board of Psychiatry & Neurology
<i>Board Certified in Psychiatry</i> |

PROFESSIONAL AFFILIATIONS

- American Board of Psychiatry and Neurology
American Psychiatric Association
Padland Psychiatric Association
Padland Psychiatrists for Prison and Sentencing Reform
The American College of Psychiatrists
The American Foundation for Suicide Prevention
The World Psychiatric Association

OFFICE OF THE ROCKY TOP COUNTY MEDICAL EXAMINER

88 WASHINGTON STREET
ROCKY CITY, PADLAND 86753

REPORT OF EXAMINATION BY COUNTY MEDICAL EXAMINER

DECEDENT MAGGIE COHAN
FIRST NAME *MIDDLE NAME* *LAST NAME*

RACE A SEX F AGE 32

HOME ADDRESS 2089 WALKING WAY, ROCKY CITY, PADLAND 86753

M W S D OCCUPATION STORE MANAGER / LOCAL COMMUNITY LEADER

TYPE & DATE OF DEATH HEAD TRAUMA SUSTAINED ON 09/10/2018

INVESTIGATING AGENCY ROCKY TOP SHERIFF'S OFFICE

DESCRIPTION OF BODY **CLOTHED** NOT CLOTHED PARTIALLY CLOTHED

EYES BRWN HAIR BRWN MUSTACHE N BEARD N

WEIGHT 150 LBS. LENGTH 5'10"

MARKS & WOUNDS INDIVIDUAL SUSTAINED MULTIPLE WOUNDS TO THE HEAD

CONSISTENT WITH HAVING BEEN STRUCK REPEATEDLY WITH A BLUNT OBJECT.

PROBABLE CAUSE OF DEATH CONTUSIONS DUE TO BLUNT FORCE TRAUMA TO THE HEAD

I hereby certify that the above-stated is true to the best of my knowledge and expertise as a duly educated and certified medical examiner in the state of Padland under P.C.A § 14-32-941.

09/11/2018
Date

Frederick Kruger
Signature – Medical Examiner

OFFICE OF THE ROCKY TOP COUNTY MEDICAL EXAMINER

88 WASHINGTON STREET
ROCKY CITY, PADLAND 86753

REPORT OF EXAMINATION BY COUNTY MEDICAL EXAMINER

DECEDENT CAROL MCBRIDE
FIRST NAME *MIDDLE NAME* *LAST NAME*

RACE W SEX F AGE 52

HOME ADDRESS 2345 ATLANTA BLVD., ROCKY CITY, PADLAND 86753

M W S D OCCUPATION EMPLOYEE – SPORTING GOODS STORE / ASPIRING FLORIST

TYPE & DATE OF DEATH HEAD TRAUMA SUSTAINED ON 09/10/2018

INVESTIGATING AGENCY ROCKY TOP SHERIFF'S OFFICE

DESCRIPTION OF BODY **CLOTHED** NOT CLOTHED PARTIALLY CLOTHED

EYES BLUE HAIR GRAY MUSTACHE N BEARD N

WEIGHT 120 LBS. LENGTH 5'4"

MARKS & WOUNDS INDIVIDUAL SUSTAINED MULTIPLE WOUNDS TO THE HEAD

CONSISTENT WITH HAVING BEEN STRUCK REPEATEDLY WITH A BLUNT OBJECT,

AS WELL AS MULTIPLE WOUNDS AND CONSTUSIONS TO THE RIBS AND MID-SECTION,

ALSO CONSISTENT WITH HAVING BEEN STRUCK REPEATEDLY WITH A BLUNT OBJECT.

PROBABLE CAUSE OF DEATH INTERNAL BLEEDING CAUSED BY BLUNT FORCE TRAUMA

I hereby certify that the above-stated is true to the best of my knowledge and expertise as a duly educated and certified medical examiner in the state of Padland under P.C.A § 14-32-941.

09/11/2018
Date

Frederick Kruger
Signature – Medical Examiner

OFFICE OF THE ROCKY TOP COUNTY MEDICAL EXAMINER

88 WASHINGTON STREET
ROCKY CITY, PADLAND 86753

REPORT OF EXAMINATION BY COUNTY MEDICAL EXAMINER

DECEDENT LIZ ASHFIELD
FIRST NAME *MIDDLE NAME* *LAST NAME*

RACE W SEX F AGE 25

HOME ADDRESS 324 BRIDGE VIEW WAY, ROCKY CITY, PADLAND 86753

M W S D OCCUPATION UNEMPLOYED

TYPE & DATE OF DEATH HEAD TRAUMA SUSTAINED ON 09/10/2018

INVESTIGATING AGENCY ROCKY TOP SHERIFF'S OFFICE

DESCRIPTION OF BODY **CLOTHED** NOT CLOTHED PARTIALLY CLOTHED

EYES BLUE HAIR BLONDE MUSTACHE N BEARD N

WEIGHT 210 LBS. LENGTH 5'10"

MARKS & WOUNDS INDIVIDUAL SUSTAINED MULTIPLE WOUNDS TO THE HEAD

CONSISTENT WITH HAVING BEEN STRUCK REPEATEDLY WITH A BLUNT OBJECT.

PROBABLE CAUSE OF DEATH CONTUSIONS DUE TO BLUNT FORCE TRAUMA TO THE HEAD

I hereby certify that the above-stated is true to the best of my knowledge and expertise as a duly educated and certified medical examiner in the state of Padland under P.C.A § 14-32-941.

09/11/2018
Date

Frederick Kruger
Signature – Medical Examiner

OFFICE OF THE ROCKY TOP COUNTY MEDICAL EXAMINER

88 WASHINGTON STREET
ROCKY CITY, PADLAND 86753

REPORT OF EXAMINATION BY COUNTY MEDICAL EXAMINER

DECEDENT SHAUN PEGG
FIRST NAME MIDDLE NAME LAST NAME

RACE B SEX M AGE 28

HOME ADDRESS 14 WINCHESTER ST., ROCKY CITY, PADLAND 86753

M W S D OCCUPATION PROFESSIONAL GAME TESTER / AMATEUR BREW MASTER

TYPE & DATE OF DEATH HEAD TRAUMA SUSTAINED ON 09/10/2018

INVESTIGATING AGENCY ROCKY TOP SHERIFF'S OFFICE

DESCRIPTION OF BODY **CLOTHED** NOT CLOTHED PARTIALLY CLOTHED

EYES BRWN HAIR BLEACHED MUSTACHE Y BEARD N

WEIGHT 250 LBS. LENGTH 5'9"

MARKS & WOUNDS INDIVIDUAL SUSTAINED MULTIPLE WOUNDS TO THE HEAD

CONSISTENT WITH HAVING BEEN STRUCK REPEATEDLY WITH A BLUNT OBJECT,

AS WELL AS MULTIPLE SIMPLE AND COMPOUND FRACTURES TO THE RIBS AND

RIGHT FOREARM.

PROBABLE CAUSE OF DEATH CONTUSIONS DUE TO BLUNT FORCE TRAUMA TO THE HEAD

I hereby certify that the above-stated is true to the best of my knowledge and expertise as a duly educated and certified medical examiner in the state of Padland under P.C.A § 14-32-941.

09/11/2018
Date

Frederick Kruger
Signature – Medical Examiner

OFFICE OF THE ROCKY TOP COUNTY MEDICAL EXAMINER

88 WASHINGTON STREET
ROCKY CITY, PADLAND 86753

REPORT OF EXAMINATION BY COUNTY MEDICAL EXAMINER

DECEDENT ED FROST
FIRST NAME *MIDDLE NAME* *LAST NAME*

RACE H SEX M AGE 30

HOME ADDRESS 14 WINCHESTER ST., ROCKY CITY, PADLAND 86753

M W S **D** OCCUPATION UNEMPLOYED

TYPE & DATE OF DEATH HEAD TRAUMA SUSTAINED ON 09/10/2018

INVESTIGATING AGENCY ROCKY TOP SHERIFF'S OFFICE

DESCRIPTION OF BODY CLOTHED NOT CLOTHED **PARTIALLY CLOTHED**

EYES BRWN HAIR BRWN MUSTACHE Y BEARD Y

WEIGHT 280 LBS. LENGTH 6'0"

MARKS & WOUNDS INDIVIDUAL SUSTAINED MULTIPLE WOUNDS TO THE HEAD

CONSISTENT WITH HAVING BEEN STRUCK REPEATEDLY WITH A BLUNT OBJECT.

PROBABLE CAUSE OF DEATH CONTUSIONS DUE TO BLUNT FORCE TRAUMA TO THE HEAD

I hereby certify that the above-stated is true to the best of my knowledge and expertise as a duly educated and certified medical examiner in the state of Padland under P.C.A § 14-32-941.

09/11/2018
Date

Frederick Kruger
Signature – Medical Examiner

OFFICE OF THE ROCKY TOP COUNTY MEDICAL EXAMINER

88 WASHINGTON STREET
ROCKY CITY, PADLAND 86753

REPORT OF EXAMINATION BY COUNTY MEDICAL EXAMINER

DECEDENT COLUMBUS EISENBERG
FIRST NAME *MIDDLE NAME* *LAST NAME*

RACE B SEX M AGE 26

HOME ADDRESS 342085 MURRAY CIRCLE, ROCKY CITY, PADLAND 86753

M W S D OCCUPATION AMUSEMENT RIDE DESIGNER; STOCKHOLDER IN SNACK CAKES

TYPE & DATE OF DEATH HEAD TRAUMA SUSTAINED ON 09/01/2018

INVESTIGATING AGENCY ROCKY TOP SHERIFF'S OFFICE

DESCRIPTION OF BODY **CLOTHED** NOT CLOTHED PARTIALLY CLOTHED

EYES BLU HAIR BRWN MUSTACHE N BEARD N

WEIGHT 180 LBS. LENGTH 5'9"

MARKS & WOUNDS INDIVIDUAL SUSTAINED MULTIPLE WOUNDS TO THE HEAD

CONSISTENT WITH HAVING BEEN STRUCK REPEATEDLY WITH A BLUNT OBJECT.

INDIVIDUAL ALSO SUSTAINED WOUNDS AND BROKEN BONES, ALSO CONSISTENT

WITH BLUNT FORCE TRAUMA, TO INDIVIDUAL'S BACK, RIBS, LEFT FOREARM, AND

RIGHT TIBIA.

PROBABLE CAUSE OF DEATH CONTUSIONS DUE TO BLUNT FORCE TRAUMA TO THE HEAD

I hereby certify that the above-stated is true to the best of my knowledge and expertise as a duly educated and certified medical examiner in the state of Padland under P.C.A § 14-32-941.

09/11/2018
Date

Frederick Kruger
Signature – Medical Examiner

ROCKY TOP COUNTY SHERIFF'S OFFICE

Rocky Top County Area Law Enforcement Arrest Report

Case # 1902-19

Arresting Officer G. Wight

Arrest Date: 09/10/2018

IDN # 2345515344

Arrest Time: 08:30 p.m.

Arresting Agency: RTCSO

ARRESTEE PERSONAL INFORMATION

Name Jack Gray-Lamb DOB 07/31/1999 Sex _____

Address 43 SE Conference Way, Rocky City, Padland 36753

Home Phone _____ Employer Padland Panthers Work Phone _____

Location of Arrest 200 Mall Circle Drive, Rocky City, Padland 86753

SSN 455-18-■■■■ Race _____ Hgt _____ Wgt _____

Eyes _____ Hair _____

NARRATIVE

On 09102018 at or about 2015 I was called to a report of a multiple homicide at or about 200 Mall Circle Drive, Rocky City, Padland 86753. I arrived to find suspect Jack Gray-Lamb located inside of 200 Mall Circle Drive, Rocky City, Padland 86753. In Jack Gray-Lamb's possession was a baseball bat, seemingly covered in blood. After obtaining the baseball bat from suspect, suspect was Mirandized and taken into custody without incident.

Witness Wichita Stone reported having observed the homicides. Witness Stone reported that the suspect utilized the baseball bat that was found in suspect's possession in committing the homicides. Witness Wichita Stone stated personally observing suspect deliver multiple blows each to each of the victims.

The six (6) victims were confirmed by checking identifications against record checks. The six (6) victims were Maggie Cohan, Carol McBride, Liz Ashfield, Shaun Pegg, Ed Frost, and Columbus Eisenberg. All were transported to Padland General Hospital, where they were pronounced dead upon arrival.

Defendant Gray-Lamb was arrested instead of issuing a citation as [offense is a felony] and offense is likely to continue.

IN THE CRIMINAL COURT FOR ROCKY TOP COUNTY, STATE OF PADLAND

THE STATE OF PADLAND,)
)
)
 Plaintiff,)
)
 v.) Docket No. 1902-19
)
 JACK GRAY-LAMB,)
)
)
 Defendant.)
)

DEPOSITION OF OFFICER GEORGE WIGHT

DIRECT EXAMINATION

- 1 Q. Could you please give your name for the record?
- 2 A. My name is George Wight.
- 3 Q. Are you currently employed?
- 4 A. Yes, I am.
- 5 Q. What are you currently employed as?
- 6 A. I am a deputy with the Rocky Top Sheriff's Office.
- 7 Q. Were you so employed on September 10, 2018?
- 8 A. Yes, I was.
- 9 Q. Were you called to the Monroeville Mall on that date?
- 10 A. Yes, I was.
- 11 Q. Please, could you tell us about that call?
- 12 A. Yes. I received a call around 8:15 p.m. that night that caused my partner and I to
- 13 respond to the Monroeville. When we arrived, we immediately entered the mall.

1 Q. What, if anything, did you observe?

2 A. There were six individuals on the ground lying in what appeared to be blood. One
3 of these individuals, later identified as Columbus Eisenberg, was off to himself.
4 Three individuals, later identified as Liz Ashfield, Shaun Pegg, and Ed Frost,
5 were clustered together in the lobby of the mall. And we found two more
6 individuals in a sports store, later identified as Maggie Cohan and Carol McBride,
7 being attended to by an EMT who happened to be on scene. We later discovered
8 that the EMT, name of Wichita Stone, had been present and witnessed the events.

9 Q. Did anything happen next?

10 A. Yes. Based upon questioning of Wichita Stone, my partner and I determined
11 there was likely one suspect as opposed to multiple. This caused my partner and I
12 to decide to search for the suspect immediately as opposed to waiting for back-up.
13 After instructing Wichita Stone to remain put, we located Jack Gray-Lamb in a
14 corner of the mall. We both knew Jack Gray-Lamb outside of work and
15 recognized Jack immediately. Jack Gray-Lamb was seated, rocking back and
16 forth, covered in what appeared to be blood splatter. Jack Gray-Lamb also was
17 holding a baseball bat, which was also partially covered in what appeared to be
18 blood.

19 Q. After you located Jack Gray-Lamb, did anything happen next?

20 A. Yes, my partner and I were able to take Jack Gray-Lamb into custody without
21 incident. The suspect kept saying something about zombies.

22 Q. Officer, were you able to locate any eye-witnesses other than Wichita Stone?

23 A. No, the mall had apparently been pretty deserted that afternoon.

1 Q. And were you able to locate any video surveillance of what had occurred at the
2 mall on the afternoon of September 10, 2018?

3 A. We were not, it seems there had been a power outage earlier in the afternoon
4 which caused the mall's surveillance to go out.

5 Q. In the course of your employment as a police officer, do you receive any training
6 on giving emergency medical treatment?

7 A. I do.

8 Q. Were you able to utilize this on any of the individuals you found at the
9 Monroeville Mall on the afternoon of September 10, 2018?

10 A. Using my training and expertise, treatment was not needed.

11 Q. Why is that?

12 A. By the time Jack Gray-Lamb was in custody and my partner and I had returned to
13 the injured individuals, they were all already dead.

14 Q. One last thing officer – what is the name of your partner?

15 A. Harley Gray.

CROSS EXAMINATION

16 Q. Officer, do you know if Harley Gray is available for questioning?

17 A. They are not.

18 Q. Do you know why not?

19 A. All I know is that Harley Gray has a personal relationship with the suspect outside
20 of work and that shortly after all of this happened, Harley Gray took personal
21 leave. I have not been able to get into contact since and, to my knowledge, no-
22 one else has either.

1 Q. Now asking about what happened at the Monroeville Mall – to be clear, you did
2 not personally observe how Maggie Cohan was wounded?

3 A. No, not personally.

4 Q. Or Carol McBride?

5 A. That is correct.

6 Q. Or any of the other 4 individuals you state received injuries?

7 A. That is correct.

8 Q. You did not personally observe any crimes occur?

9 A. That is correct.

10 Q. After arriving, you took Jack Gray-Lamb into custody?

11 A. Not immediately, but yes, Jack Gray-Lamb was taken into custody.

REDIRECT EXAMINATION

12 Q. Do you know Jack Gray-Lamb outside of work?

13 A. I do.

14 Q. And I am showing you a copy of the arrest report. Is all of the information in
15 there true and accurate to the best of your knowledge?

16 A. It is.

CRIMINAL RECORD: WICHITA STONE

Charge: Possession of Marijuana
County, State: Rocky Top, Padland
Date of Offense: 03/14/2000
Disposition: Plea of Guilty, sentenced to 24 hours of community service.

Docket No. 0016581
Date of Disposition: 04/15/2000

Charge: Obstructing Public Walkway
County, State: Rocky Top, Padland
Date of Offense: 09/24/2001
Disposition: Dismissed for failure to prosecute.

Docket No. 01684165
Date of Disposition: 12/01/2001

Charge: Vandalism
County, State: Rocky Top, Padland
Date of Offense: 08/04/2002
Disposition: Plea of Guilty, 30 days imprisonment.

Docket No. 0256189
Date of Disposition: 08/22/2002

Charge: Disturbance of the Peace
County, State: Rocky Top, Padland
Date of Offense: 09/30/2002
Disposition: Dismissed for failure to prosecute.

Docket No. 029965
Date of Disposition: 11/20/2002

Charge: False Check - Forgery
County, State: Rocky Top, Padland
Date of Offense: 12/25/2002
Disposition: Conviction after bench trial, 30 days imprisonment.

Docket No. 0215644
Date of Disposition: 01/20/2003

Charge: Perjury
County, State: Rocky Top, Padland
Date of Offense: 04/01/2003
Disposition: Dismissed per Plea Agreement.

Docket No. 036845
Date of Disposition: 05/15/2003

Charge: Felony Theft (Class D Felony)
County, State: Rocky Top, Padland
Date of Offense: 04/01/2003
Disposition: Guilty per Plea Agreement, 2 years probation, restitution and court costs.

Docket No. 036846
Date of Disposition: 05/15/2003

Charge: Assault
County, State: Rocky Top, Padland
Date of Offense: 01/01/2007
Disposition: Guilty per Plea Agreement, 11 months/29 days suspended all but 48 hours.

Docket No. 071981
Date of Disposition: 03/20/2007

CRIMINAL RECORD: JACK GRAY-LAMB

Juvenile Record Sealed

Charge: Theft (Class E Felony)

County, State: Rocky Top, Padland

Date of Offense: 08/04/2017

Disposition: Plea of Guilty, sentenced to one year imprisonment

Docket No. 1798198

Date of Disposition: 08/15/2017

Charge: Burglary

County, State: Rocky Top, Padland

Date of Offense: 08/04/2017

Disposition: Dismissed per plea agreement

Docket No. 1798199

Date of Disposition: 08/15/2017

An excerpt from

The Psychologically Based Credibility Assessment Tool (PBCAT): A Closer Look

Ignatius Pippen¹, Rey Potter², Thorin Thistlewhite¹

One glaring error on behalf of the creators of this assessment was the lack of reliability. During studies, volunteers would watch videos of subjects telling a story. Subjects were either given a false story or asked to tell a story based on personal experience. Volunteers were then asked to look for certain cues. These cues were all based on subjective questions. One volunteer may interpret an admittance of lack of memory as honesty, while another volunteer may view it as a way to avoid getting caught in a lie. Another cue was “rate of speech.” A baseline rate of speech will vary from person to person and asking volunteers to decide if a subject is speaking too fast is a matter of opinion. Once all of the data was compiled, it was found that there was only a sixty percent chance of guessing whether or not a subject was lying.

Another limitations of this assessment is the lack of diversity in testing population. Only two studies were performed with a total of 150 participants. Both times, the sample was made up of only students from the same college. Seventy-one percent were female and eighty-three percent of the total were Hispanic. This, once again, raises questions regarding subjectivity. A better assessment would have many studies, completed over an extended period of time, with a better sample size, with a make-up representing the population.

One last criticism of the Psychologically Based Credibility Assessment Tool is a lack of specific population with which to use it. Many studies, as well as experience has demonstrated that different ages, genders, races, cultures, and even regions have different ways of telling stories. To some groups, exaggerating a story may be culturally acceptable. Other groups may believe that lack of eye contact and pausing to think reflect mindfulness of the story and of the observer, listener, or camera. These are both cues on the PBCAT that indicate lying. Since the assessment does not specify a population with which to use it, it is critical that professionals refrain from using it until more information is released and further studies are conducted.

¹ Department of Psychology, University of College, Somewhere, Tennessee, USA

² Department of Linguistics, University of College, Somewhere, Tennessee, USA

Count Five: Second Degree Murder of Ed Frost

We, the Jury, find the defendant, Jack Gray-Lamb, _____.
[write Guilty, Not Guilty,
or Not Guilty by reason of insanity]

Count Six: Second Degree Murder of Columbus Eisenberg

We, the Jury, find the defendant, Jack Gray-Lamb, _____.
[write Guilty, Not Guilty,
or Not Guilty by reason of insanity]

Foreperson