

Proposal Abstract

The grant will allow Investigating Innocence to hire an executive director and fund the position of director of investigations that will enable the organization to greatly increase its ability to provide post-conviction investigative services to indigent inmates.

The organization was founded by private investigator Bill Clutter, who started the Downstate Illinois Innocence Project at the University of Illinois at Springfield (UIS) in 2001. Clutter initiated and co-wrote the Bloodsworth grant that was awarded to UIS in 2010, which established a Post-conviction DNA Testing Program for Illinois. The main focus of that grant was to conduct DNA testing in the case of Thomas McMillen. Despite a DNA exclusion, McMillen remains incarcerated because of the refusal of local prosecutors to seek justice. A suspect whose thumb print was identified in the victim's vehicle refuses to provide a DNA sample to compare with a partial profile found on the bra of the victim torn by the killer. The grant will provide investigative resources for the McMillen case.

Investigating Innocence has called on lawmakers in Illinois to establish a state-wide conviction integrity unit to provide an objective review of actual innocence claims. The grant will provide seed money for 3 CLE programs, including one to educate policy makers of the merits of prosecutorial-based conviction integrity units.

A 501(c)(3) not-for-profit, Investigating Innocence was launched in February of 2013 at Chicago-Kent College of Law with a CLE program called *Side-Effects: Homicidal & Suicidal Behavior Influenced by Prescription Medications*. This program focused on the flaws of the conviction of Christopher Vaughn, who was charged in 2007 with capital murder in Joliet, Illinois, despite an Illinois State Police CSI, who concluded that the evidence supported a murder-suicide

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committed by Vaughn's wife. The grant will provide resources to conduct a science-based crime scene reconstruction that will test the validity of the testimony of the State's bloodstain expert.

A key partner in this grant application is the Exoneration Project based as a clinical program at the University of Chicago Law School, which provides legal representation to indigent inmates throughout the United States. The two projects are currently working together on McMillen, and have collaborated successfully in the past, helping to free former prosecutor Curtis Lovelace. Other strategic partners include Bellarmine University and Brandeis School of Law at the University of Louisville, which will promote student internships to assist the director of investigations with case screening, where he resides.

Proposal Narrative

a. Description of the issues

Lack of financial resources to investigate claims of actual innocence

Investigating Innocence is a 501(c)(3) not-for-profit organization of private investigators whose members are devoted to freeing the wrongfully convicted. Since its inception, Investigating Innocence has played a major role in the exoneration of three indigent inmates:

- 1) **David Camm**, a former state trooper spent 13 years in prison in Indiana. He was wrongfully convicted based on misinterpretations of bloodstain pattern analysis (See attachment 1);
- 2) **Rodney Lincoln**, spent 36 years in prison in Missouri and was freed through executive clemency with the support of the crime victim whose mistaken eyewitness testimony convicted Lincoln (See attachment 2);
- 3) **Curt Lovelace**, a former prosecutor from Quincy, Illinois, spent two years in pre-trial detention after he was wrongfully indicted of First-Degree Murder eight-years after his first wife died of a natural disease process called steatosis. (See attachment 3).

To date, the exonerations have largely been the result of pro bono services provided by founder Bill Clutter, a licensed private investigator who started the Downstate Illinois Innocence Project 20 years ago.¹ The organization currently lacks staff support and has depended on volunteer activity, which has been limited in what the organization can do.

Although nearly 200 requests for services have been made by indigent inmates, there is insufficient resources to screen these cases. The grant will provide the resources to undertake this task. (See attachment 4, List of Inmate Requests).

¹ The project was renamed the Illinois Innocence Project after being awarded a Bloodsworth grant in 2010. The Downstate Illinois Innocence Project was the first undergraduate program in the nation and accomplished three exonerations under the leadership of Bill Clutter by the time it was awarded the Bloodsworth grant, and this was accomplished without a law school affiliation, through the recruitment of pro bono attorneys.

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A need for state-wide conviction integrity units

In April of 2019, Investigating Innocence proposed creating a state-wide conviction integrity unit within the Office of the Illinois Attorney General. In July of 2019, members of the AG's upper management met to discuss this proposal, beginning a dialogue to collaborate on this policy reform. Investigating Innocence is working with lawmakers and has invited the Office of the Illinois Attorney General to support a resolution in the General Assembly for the creation of a Task Force to Study the Implementation of a State-wide Conviction Integrity Unit. Members appointed to this commission will represent a broad range of stakeholders who are involved in the criminal justice system, including criminal defense attorneys, prosecutors, judges, and representatives of the wrongful conviction review entities operating within Illinois. (See Group attachment 5, Proposal to Create a State-Wide Conviction Integrity Unit in Illinois).

The case of Jonathan Fleming, investigated by New York PI's Bob Rahn and Kim Anklin, founding members of Investigating Innocence, illustrates the need for conviction integrity units in every jurisdiction.² "Once we realized he was innocent, we were 100 % committed to his case," said Rahn. "There was no way we were going to abandon him," Anklin recalled. The story published in PI Magazine in 2015 explains the significance of the role of private investigators in the fact-finding process necessary to free the wrongfully convicted:

The two PIs made an appointment to meet with the Conviction Integrity Unit. John O'Mara, chief of the Conviction Integrity Unit at the Brooklyn District Attorney's Office, was blunt with them. Unless they could find new evidence, there was no way they would agree to vacate the conviction based on the recantation testimony. The two PIs obtained witness statements identifying the man whom they believed to be the actual killer, along with two other men who were with the killer. They traveled to South Carolina and obtained a statement from the get-away driver.

² Dallas County, Texas established the first conviction integrity unit in the country in 2007. Since then, a handful of other major metropolitan counties have created independent conviction review units, like the Brooklyn District Attorney's Office, created in 2011.

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With this new evidence, they convinced O'Mara to open a joint investigation of the Fleming case. Working with the prosecutor's office, Rahn and Anklin were given open access to all records and evidence gathered by the NYDP.

During one of their many meetings, Rahn describes the moment when they felt the doors open for Jonathon Fleming's release from prison. "We were sitting in a conference room with ADA Jessica Wilson," said Rahn, "She said, 'This might help you' and slid two documents across the table."

The two PIs saw that it was the receipt that Fleming had told them about. "Oh my God! Where did this come from?" Anklin said. They were told it had been in Jonathan Fleming's pocket when police placed him under arrest for the murder of Daryl Rush, then in a police evidence vault, in the possession of the police all these years . . .

ASA Wislon also handed them a letter from the Orlando Police Department summarizing its investigation from 1989, which corroborated Fleming's alibi by identifying hotel employees who remembered seeing Fleming. These two documents were never disclosed to Fleming's defense attorneys before trial. "A clear *Brady* violation", said Anklin.

Within a few weeks, on April 8, 2013, Anklin and Rahn stood in the gallery of the Brooklyn Supreme Court and watched as defense attorney Anthony Mayol and John O'Mara stood before Judge Matthew D'Emic requesting an order be granted vacating Jonathan Fleming's conviction.

Anklin described the scene. "After hugging his defense team, the tears fell as Jonathon ran to embrace his mother." Their client walked out a free man, after nearly 25 years in prison for a crime he didn't commit. "I would still be in prison today if it were not for Bob and Kim. I thank God they believed in me," Fleming says.

(See attachment 6, How Two PIs Freed Jonathan Fleming)

Only a limited number of jurisdictions have conviction integrity units, and these are mostly based in counties with large metropolitan populations. Small and mid-size counties, on the other hand, lack the financial tax base to create objective conviction integrity review units.

The grant will allow Investigating Innocence to develop a CLE program (that can be video-recorded for future use) using the story of Jonathan Fleming, and PIs Kim Anklin and Bob Rahn, to educate the legal community and policy makers on the need for establishing a state-wide

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conviction integrity unit in Illinois. This event, proposed for the 2022 legislative session in Springfield, the state capital, will be timed to allow the panel speakers to also participate in providing testimony before the Senate Judiciary Committee when legislation will be presented to create a state-wide conviction integrity unit.

Many indigent inmates are left to languish in prison, despite having strong claims of actual innocence, like Thomas McMillen, one of the clients of Investigating Innocence who will benefit from this grant proposal. Having an independent state-wide conviction integrity review unit within the Office of the Attorney General will remove local bias that has historically obstructed justice.³

Bloodstain Pattern Analysis

Many innocent defendants have been convicted based on the testimony of experts who specialize in bloodstain pattern analysis. Investigating Innocence founder, Bill Clutter worked on two of the most notable cases--that of former Indiana state trooper David Camm in New Albany, Indiana--and Julie Rea, from Lawrenceville, Illinois, a Ph.D. candidate whose only child was brutally killed by a serial killer. Clutter conducted the crime scene analysis in both of these cases (See attachment 7, The Unreliability of Bloodstain Pattern Analysis: A Proposal to Review BPA Convictions).

³ The case of Randy Steidl is a notable example of this phenomenon. His death row exoneration was hindered by local authorities, who refused to concede he was innocent. He was finally released from prison on May 28, 2004, after Illinois Attorney General Lisa Madigan conducted a conviction integrity review of his case. Based on this review, Madigan announced she would not appeal the order of a federal district court judge who cited Clutter's investigation in granting habeas relief for Steidl. More than 13 years elapsed after the discovery of forensic evidence which disproved the testimony of a self-described eye-witness whose testimony framed Steidl. Current Illinois Attorney General, Kwame Raoul was the Senate sponsor of the bill that abolished the death penalty in Illinois. Before the vote was taken, he called on Steidl, seated in the gallery, to stand, and pointed to his case among the reasons for abolishing the death penalty. It took an independent review by a judge who had no ties to Edgar County, where Steidl was convicted, to objectively decide his case. In contrast, the local courts sided with the county prosecutor in denying justice for Steidl. His case is typical of so many others, who remain in prison today.

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In 2009, the National Academies of Science issued a landmark report called *Strengthening Forensic Science in the United States: A Path Forward*, which examined the use of forensic evidence in American courtrooms, a study based on DNA exonerations. The report found that the use of bloodstain pattern analysis was among the forensic disciplines prone to examiner bias. The report concluded, “the opinions of bloodstain pattern analysis are more subjective than scientific” (at p. 177).

The grant will provide funding to conduct case screening and conviction integrity reviews of the cases of indigent inmates who have been convicted based on the testimony of bloodstain experts. One such case is the Joliet, Illinois case of Christopher Vaughn.

Investigating Innocence was launched in February of 2013 at Chicago-Kent College of Law with a CLE program called *Side-Effects: Homicidal & Suicidal Behavior Influenced by Prescription Medications*, which focused on the flaws of the conviction of Christopher Vaughn. (See attachment 8).

Vaughn was indicted in 2007, accused of killing his wife and three children. His defense team (which included the founder of Investigating Innocence) was funded by the Capital Litigation Trust Fund, a reform that was enacted by the Illinois General Assembly, taking effect on January 1, 2000. The intent of this legislative reform was to “level the playing field” as a means of preventing the conviction of an innocent person facing the death penalty, which created a state-wide fund for the appointment of experts, private investigators and private attorneys specially trained and experienced in death penalty litigation.

However, after Illinois abolished the death penalty on March 11, 2011, funding reverted back to Will County, which refused to provide sufficient resources for the defense team to continue its work, after investing four years preparing for trial. A new defense team from the public

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defender was appointed, and a year later, in 2012, Vaughn was convicted and received a life sentence. The key witness for the State was the testimony of a bloodstain expert who interpreted bloodstain patterns at the crime scene.

In the weeks before the death penalty was abolished, Vaughn's defense team conducted the deposition of Robert Deel, the Illinois State Police crime scene investigator who was assigned to the case.⁴ Deel revealed that the crime scene evidence supported a murder-suicide committed by Vaughn's wife and did not support a theory that Vaughn killed his family (See attachment 9, Deel Deposition Transcript). Deel described pressure from above to validate a theory that Christopher Vaughn was responsible for the deaths of his family:

. . . I had gotten a phone call from Captain Kaupas where they laid out this whole theory of how this crime occurred. . . , (Deposition Tr., p.91) Basically that Christopher had premeditated this whole thing . . . And I told him in that initial phone conversation that they needed to take a step back for a minute and let us finish the autopsies and processing of the vehicle because it was way too early to be able to make any kind of determination. . . (98)

CSI Deel said the case agent Gary Lawson believed that Christopher Vaughn stood outside the passenger door, shooting into the vehicle. Deel and a female crime scene investigator put on Tyvek suits and sat inside the driver and passenger seats of the Ford Explorer to demonstrate the plausibility of Kimberly Vaughn being the shooter. During this demonstration on June 14, 2007, Deel had Sgt. Lawson take an unloaded gun and demonstrate his theory, which Deel said was contradicted by the bullet trajectory evidence. Deel testified that once he started challenging the theories of investigators, case agent Gary Lawson had no further communication with him (109-112).

⁴ The right to take depositions, allowed only in civil cases in that state, was one of the reforms that was established by the Illinois Supreme Court in 2001, to enhance the truth-seeking process for defendants facing the death penalty.

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Deel attended only one major case review meeting. This was on Friday June 15, 2007, one day after the deaths of Vaughn's family. In addition to the CSIs and investigators, the meeting included forensic scientists at the Joliet crime laboratory, and the elected State's Attorney of Will County. However, Deel was not invited to participate in any subsequent major case review meetings after that. (pp. 103-04).

. . . every time that I offered up something that was contrary to what they said, they had some reason why I didn't know what I was talking about. . . every time I would come up with something that the evidence would (p.98) suggest or support or you would be able to at least follow the evidence to come to a logical conclusion, basically I was just given some other crazy way that this could have occurred or they would change their theory of what happened to try to match the evidence rather than letting the evidence dictate to you the events that occurred (p.99).

Tunnel vision, which Deel described in his deposition, occurred despite the recommendations of the Governor's Commission on Capital Punishment, which released its report five years before Christopher Vaughn was indicted on capital murder charges:

Evidence of such "tunnel vision" or "confirmatory bias" is found in a number of the cases involving the 13 men who were ultimately released from death row in Illinois . . . Pressure always exists for a police department to solve a crime, particularly where that crime is a homicide...in any investigation, the danger exists that rather than keeping an open objective mind during the investigatory phase, one may leap to a conclusion that a person who is a suspect is in fact the guilty party. Once that conclusion is made, investigative efforts often center on marshalling facts and assembling evidence which will convict that suspect, rather than continuing with the objective investigation of other possible suspects. There is a fine line to be drawn in such circumstances, but where a homicide is concerned and the suspect may be exposed to the death penalty, it is extraordinarily important that law enforcement agencies avoid "tunnel vision" (Governor's Commission on Capital Punishment, April 2002, State of Illinois p. 20).

Vaughn, who is indigent, has not been able to challenge the fairness of his trial through a post-conviction appeal. Indigent defendants in Illinois are not entitled to post-conviction investigative resources as a matter of right. Investigating Innocence is seeking funding through this grant to provide those resources.

“Shaken Baby Syndrome”

Police agencies throughout the country continue to rely on unproven scientific methods, such as Shaken Baby Syndrome, a controversial diagnosis that often leads to the indictment of innocent caregivers. Law enforcement agencies and hospitals often fail to thoroughly investigate a differential diagnosis before arresting innocent parents and daycare providers, unjustly accused of Shaken Baby Syndrome.

After the exoneration of daycare provider Audrey Edmonds in 2008, who spent more than a decade in prison in Wisconsin⁵, law professor Deborah Tuerkheimer published a seminal law review article called *The Next Innocence Project: Shaken Baby Syndrome and the Criminal Courts*, which described the magnitude of the problem:

Given the scientific developments described, we may surmise that a sizeable portion of the universe of defendants convicted of SBS-based crimes is, in all likelihood, factually innocent.⁶

Investigating Innocence has identified a number of potentially innocent caregivers and parents who are currently in custody. The grant will provide resources to conduct a thorough conviction integrity review of these cases.

b. Project Design and Implementation

Method of case screening

Currently, Investigating Innocence is limited in the number of cases it can accept. It has focused on one case at a time. A detailed questionnaire is used to screen cases which can be

⁵ The work of the Wisconsin Innocence Project pioneered a new focus on Shaken Baby Syndrome cases. The Wisconsin appellate court decision described a “fierce disagreement” among different disciplines within the medical community, which provided new evidence to overturn Edmond’s conviction. *State of Wisconsin v. Audrey A. Edmonds*, 4th Dist. Court of Appeals slip opinion, Jan. 31, 2008, at p. 7.

⁶ Deborah Tuerkheimer, *The Next Innocence Project: Shaken Baby Syndrome and the Criminal Courts*, Washington Law Review, vol 87 2009, pp. 1-58, at p. 22.

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downloaded from our website. However, the organization lacks the resources to screen cases at this time.

Investigating Innocence plans to upgrade the capabilities of its website to have an interactive questionnaire that can be completed on-line by applicants, which will automatically sort the responses into a data spreadsheet and inmate profile. This improvement will make the process of case screening more efficient.

All inmates who request a conviction integrity review will be required to attest under the penalty of perjury that they have a meritorious claim of actual innocence in order to have their case reviewed for further investigation. Specific questions will ask inmates whether their conviction was obtained based on the testimony of any of the following expert witnesses:

- 1) microscopic hair comparison;
- 2) bite mark comparison;
- 3) arson cause and origin;
- 4) bloodstain pattern analysis, and;
- 5) shaken baby syndrome.

These 5 factors are at the greatest risk of resulting in a wrongful conviction. Other factors will also be examined, as well, such as the use of in-custody informants, coerced confessions, and eye-witness misidentification.

John Lentini is a pioneering arson expert who has provided Investigating Innocence with a letter of intent to assist with the review of arson convictions predicated on what, now, is regarded as junk science. Many innocent defendants were convicted based on the testimony of arson experts who relied on cause and origin assumptions that have since been discredited by science-based experiments conducted by Lentini (See attachment 10).

Investigating Innocence has recruited other experts to assist with the case screening of shaken baby syndrome convictions. Forensic pathologist Shaku Teas, and radiologist David

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Ayoub, have provided letters of intent to assist with the evaluation of these cases, which have a high risk of convicting innocent parents and caregivers (See attachment 11, A Proposal to Screen Shaken Baby Cases).

Investigating Innocence will work collaboratively with the Exoneration Project based at the University of Chicago in screening the current list of inmate requests, utilizing law student interns to assist in this effort. Collaborative partnerships also include the Brandeis School of Law at the University of Louisville (See attachment 12) and the undergraduate criminal justice program at Bellarmine University in Louisville, where the founder of Investigating Innocence resides⁷ (See attachment 13). Members of Investigating Innocence are skilled private investigators who are devoted to freeing the wrongfully convicted. When needed, their services may be called upon to assist with the case screening process.⁸ (See attachment 14, Letters of Intent from Private Investigators). Data collected from this process will be provided in progress reports to the DOJ. Cases identified to have meritorious claims of actual innocence will be referred to a member of both Investigating Innocence and the Innocence Network for high quality legal representation. The identification of more cases in need of post-conviction investigation may support an additional grant application.

Method of Case investigations

Case investigations will be supervised by the director of investigations Bill Clutter. He will be the lead investigator for three of the four cases that have been found to have meritorious claims of actual innocence, which will be funded by the grant.

⁷ After Illinois abolished the death penalty, Bill Clutter moved to Louisville in 2013, where he maintains a private practice working on capital cases. If the grant is awarded, he will transition the majority of his time investigating actual innocence claim, while maintaining an office in Springfield, Illinois.

⁸ To receive a listing on www.InvestigatingInnocence.org members must either 1) make an annual minimum donation of \$100 to support the fundraising activities of the Organization; or, 2) donate pro bono services equally \$100 or more to case screening that may be requested

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DNA testing

Investigating Innocence has requested a letter of intent from the Innocence Project in New York to fund DNA testing for those cases where biological evidence may be tested for DNA. Investigating Innocence founder has collaborated with the Innocence Project in the past, and in 2009, hand-delivered a copy of the Motion for Post-Conviction DNA Testing to Support a Claim of Actual Innocence in the case of Thomas McMillen, which persuaded the Innocence Project to enter its appearance to represent co-defendant Gary Edgington and fund the DNA testing in the McMillen case (See case description below).

Brandeis School of Law at the University of Louisville will provide law student interns through the Samuel L. Greenbaum Public Service Program to work under the supervision of staff attorneys from the Innocence Project to assist with the preparation of motions for post-conviction DNA testing.

The case of Christopher Vaughn

The grant will enable Investigating Innocence to employ the services of Eugene Liscio, an expert in crime scene reconstruction, bloodstain pattern analysis, and computer generated 3-D animation to conduct science-based experiments to test the validity of the opinions that were expressed by the State's bloodstain pattern expert. Liscio worked with Bill Clutter on the case of David Camm, and produced an animated crime scene reconstruction in that case which persuaded a jury to acquit Camm, who was wrongfully convicted based on the testimony of bloodstain experts. Mary K. Hartman, a retired crime scene investigator with the Louisville Metro Police Department will assist with analyzing the crime scene evidence and will participate in the crime scene investigation. (See attachment 15, Proposal to Conduct a Science-based Crime Scene Reconstruction in the Case of Christopher Vaughn).

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The Exoneration Project will provide law students and lawyers to conduct legal research and writing for a Motion for Post-Conviction DNA Testing to Support a Claim of Actual Innocence pursuant to 725 ILCS 5/116-3 in this case, which may be supported by the outcome of the crime reconstruction. (See attachment 16, Memorandum of Understanding).

The case of Sarah Andry: Who killed Darrin Atkins?

Andry was convicted in Dubois County, Indiana in October 2020 and sentenced to 54 years in prison. She was convicted based on the testimony of a cooperating co-defendant who gave a false confession implicating himself in the murder. There is evidence from the crime scene that was not tested for DNA, which may reveal the identity of the perpetrator. The grant will allow Mr. Clutter to conduct a post-conviction investigation as the fact investigator, which the case lacked prior to trial. (See attachment 17, Proposal to Conduct DNA Testing and a Post-Conviction Investigation of the case of Sarah Andry).

The Cases of Thomas McMillen and Gary Eddington: Who Killed Melissa Koontz?

Investigating Innocence is collaborating with the Exoneration Project and the Innocence Project to continue the investigation to find who killed Melissa Koontz. As stated in the proposal abstract, the McMillen case was the inspiration for creating a Post-conviction DNA Testing Program for Illinois, when DOJ awarded the University of Illinois at Springfield the Bloodsworth grant more than ten years ago. In 2008, PI Bill Clutter secured the cooperation of the Sangamon County Sheriff, who agreed to run an unknown finger print found on the rearview mirror of the victim's vehicle that had been driven by the killer. The person whose was fingerprint was identified still refuses to provide a sample of his DNA, which can now be compared with an unknown partial male profile that was recovered from the lace bra of the victim torn open by the

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killer. The grant will fund further fact-investigation by Clutter. (See group attachment 18, The case of Tom McMillen).

The case of Noel Quevedo: A Shaken Baby Conviction

The grant will allow the director of investigations to work collaboratively with private investigator Silvija Basijokaite, based in Lemont, Illinois, to provide a thorough post-conviction investigation in the case of Noel Quevedo, who was convicted of his own child's death based on a diagnosis of shaken baby syndrome in 2003. In 2019, Basijokaite requested the assistance of Investigating Innocence. The director of investigations provided samples of medical timelines he produced in other cases. With this guidance, PI Basijokaite prepared a detailed medical timeline for her client which shows that the child had underlying medical issues, including prematurity of birth and meningitis, among other medical conditions, which are risk factors for producing spontaneous bleeding of the brain as a differential diagnosis (See group attachment 19, The Case of Noel Quevedo). Basijokaite has exhausted the initial retainer the family paid her, and she has devoted countless hours pro bono because she believes in her client's innocence. It is the opinion of Investigating Innocence that her client is innocent and deserving of post-conviction resources this grant will provide. The grant will allow us to retain the services of forensic pathologist Shaku Teas, and radiologist David Ayoub as consulting experts.

Investigating Innocence founder Bill Clutter has extensive experience defending innocent parents and caregivers accused of shaken baby syndrome and is the author of *Avoiding False Accusations of Child Abuse: A Training Guide for Investigating a Differential Diagnoses for Parents and Caregivers Accused of Shaken Baby Syndrome*, which will be used as a training guide for PIs and student interns as a blueprint for conducting post-investigations on this subject matter. (See attachment 20). Investigating Innocence will use this manual as a handout for CLE events

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aimed at educating hospital risk management departments and law enforcement agencies, as well as policy makers. The goal is to have hospital risk management departments to adopt this method of investigation when innocent caregivers and parents are under investigation when children are hospitalized with the triad of symptoms (retinal hemorrhages, and bleeding and swelling of the brain) which previously was characterized (erroneously) as pathognomonic of Shaken Baby Syndrome.

Investigative journalism

Another method of investigation will involve investigative journalism. Doug Longhini (retired producer at CBS 48 Hours); Ron Zimmerman (a videographer and film producer whose story on the Rodney Lincoln for Crime Watch Daily, nominated for an Emmy Award, paved the way for Lincoln's release from prison); and Julie Davidson (a retired film editor for CBS) will guide this program.

The grant will fund their work to video record and edit 3 CLE programs that the grant will provide seed money to organize. (See attachment 21 Proposal for Creating a Video Production Unit: Telling the Stories of the Wrongfully Convicted).

Capabilities and Competencies

Bill Clutter, who leads Investigating Innocence, has over 35 years of experience investigating claims of actual innocence. (See attachment 22 Capabilities and Competencies of Key Participants)