

1) Mitigation: DH Victimology & Hx of Domestic Violence Abuse (DVA)

→ 2) Psych Eval for Domestic Violence Trauma by Nadia Kuley or (more likely) her husband, Thomas V. Ryan, Ph.D., A.B.P.P. Clinical Neuropsychologist
Kuley, Ryan, & Associates 40 Lambert Street, Suite 222 Staunton, VA 24401 886-3956

→ 3) Find & Employ Domestic Violence Expert to testify as to PTSD precursors for DVA victims who “snap and go crazy and shoot their [abusive] husband/boyfriend . . .”

4) Review Walter Green IV’s strategy for acquittal of case with similar circumstances:

Cite: CoV vs. Patricia Ann Allen (Rockingham Circuit” (see Transcript)

“Patricia Ann Allen, 50, was charged with first-degree murder after shooting Gary Lee Clifton, 44,”
(Incident occurred in her Fulks Run home in December 1998)

Cite: DNR Archives for news articles relating to case (\$2.95 fee for reprints online)

5) Interview DH extensively about her early childhood, her relationships with parents, siblings, friends. Paramours, co-workers, supporters, neighbors, enemies, etc.

→ 6) Interview: Parents, Siblings, Friends, Paramours, Co-Workers, Neighbors & Enemies

→ 7) BI on Stanley Dustin Ray Stout, and, where apropos, Witnesses for both sides.

→ 8) Procedural Review? Forensic Review? Ballistics Review?

9) Private Polygraph Examination in Harrisonburg offices? (Danny Bragg/\$1000 fee)

EXHIBIT
NO. 50