

Confidential Defense Map for Charlie William Calhoun (Charlie) from DefenseMap.com

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Total time: 4:43

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Questions should be submitted to Info@DefenseMap.com.

### Adult case

- a. Case Description: A new case (no conviction, sentence, or dismissal yet).
- b. Charges/Investigation: 4 counts of delivery of crack (with a total weight of 15 grams).
- c. Date of arrest: January 30, 2022.
- d. Case Type: State case.
- e. Court/Locale: Elkhart Superior Court; Elkhart County, Indiana, USA.
- f. Case number: Unknown.
- g. Defense attorney: Lawrence Lovett, Public Defender's Office.
- h. Prosecutor: Priscilla Jacobson.
- i. Judge: Ronald Sandford.
- **j.** Custody/Probation/Parole: In custody (*Bail/Bond issue!* My bond is set at \$100,000 or \$10,000 cash. I could pay MAYBE \$1,500. I'd live wherever could be agreed: in my usual apartment I've been renting for 8 months, with my friend Myron Paine, or with my girlfriend. They are all responsible people, employed full-time, and with no criminal records. I have lived my whole life in the area. My schooling, jobs, family, and friends are all here.)/Not on probation/Not on parole.

#### **Birth/Race/Gender**

- k. Age: 20.
- I. Race: Black; Not Hispanic/Latino.
- m. Gender: Male.

## **Contact information**

**n.** Address: Elkhart County Criminal Complex, 101 Main Street, Elkhart, Indiana. If I got released, I'd probably live with my girlfriend at 1120 S. Michigan, St., South Bend, Indiana 46601.

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- o. Primary Telephone: None now. My cell is 574-909-8721.
- p. Email: charlie22calhoun@hotmail.com.
- q. Emergency Contacts:
  - 1. Chante Farmer / Girlfriend / 574-980-8832 / chantezfarmer10@gmail.com. 2. Myron Paine / Friend / 574-499-0128 / PaineMyron5@aol.com.

Professional(s): Charlie Asher (Attorney); Kylea Asher (Attorney).

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### Important notes to client on use of this Defense Map and these 7 Flags.

- ✓ The following 7 Flags may help you and your attorney in deciding on the best steps to take. But, the entire report is important, so read it all carefully. Take notes for your next discussion with your attorney.
- ✓ You can log back on as often as you want to add more information.
- ✓ Clients can often help their cases by considering any personal changes they'd like to make in their lives. Even one positive change can help many cases.
- **Information supplied in support of pretrial release** (Note: This client's circumstances appear to include 11 pro-release factors overlooked in some risk assessment formulas. p. 5.)
- 2. Client's sense of personal safety (Section 2, p. 7): The client reports feeling "Extremely unsafe."
- 3. Emergency needs (Section 2, p. 7): The client reports some emergency needs.
- 4. Case descriptors from client
  - 1. How correct/fair the client considers the charges (Section 3, p. 7): Partly correct and fair (1 out of 2).
- 5. Outlook and functioning:
  - 1. Childhood years (Section 13, p. 9): 16 childhood assets reported as either partly or completely missing, and 27 childhood challenges disclosed. The client's responses show an Adverse Childhood Experience (ACE) score of 7 out of 10.
  - 2. Adult years (Section 15, p. 12): 9 of 14 important life assets either missing or partially missing.
  - 3. Addictive patterns 1 possible issue(s) disclosed.
    - **a.** Use of drugs (other than alcohol) (Section 17, p. 13): 1 significant responses, some indication (1 out of 2) of a possible drug issue.
  - 4. Mood and functioning issues (Section 19, p. 14): 3 possible issues disclosed.
    - a. Thoughts of hurting myself: 8 significant responses.
    - b. Depression: 10 significant responses.
    - c. Dependence/Codependence: 6 significant responses.
- 6. The client reports a wish to make changes in these 7 areas of life (Section 22, p. 15):
  - 1. Relationships (details on p. 15).
  - 2. Work/work skills (details on p. 15).
  - 3. Alcohol or drug use (details on p. 15).
  - 4. Counseling (details on p. 15).
  - 5. Finances, spending, and money matters (details on p. 15).
  - 6. Ways of handling problems (details on p. 15).
  - 7. Better use of a personal strength or skill (details on p. 15).
- 7. Character and mitigation evidence (Section 23, p. 16).

Action ideas of attorney and client after reading this Flags page:

NOTE: Special attention may be warranted for the information summarized in Flags 5 and 6 above. Useful options may include (a) an addiction evaluation, (b) a counseling/therapy evaluation, and (c) any other course of action counsel and client think could be helpful.

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# **Summary of Sections**

Special support for pretrial release (p. 5).

# Part A: Legal

- 1. What's most on client's mind (p. 7).
- 2. Client's safety/Emergency needs (p. 7).
- 3. Case details (p. 7).
- 4. Other criminal cases/arrests (p. 8).
- 5. Other important legal cases (p. 8).

# Part B: Basic Profile

- 6. Military service (p. 8).
- 7. Physical health (p. 8).
- 8. Family and other important relationships (p. 8).
- 9. Education (p. 9).
- **10. Employment** (p. 9).
- 11. Use of free time (p. 9).

## Part C: Personal Challenges

- 12. PTSD/Repeating bad memories or nightmares (p. 9).
- 13. Childhood years (p. 9).
- 14. One or more controlling or hurtful partners (p. 12).
- **15. Adult years (p. 12)**.

# Part D: Addictive Patterns

- 16. Use of alcohol (p. 13).
- 17. Use of drugs (other than alcohol) (p. 13).
- 18. Other abuse or addiction issues (p. 14).

## **Part E: Personal Functioning**

- 19. Mood and functioning issues (p. 14).
- **20.** Counseling history (p. 15).

# Part F: Life Patterns and Character and Mitigation Evidence

- 21. Client today (p. 15).
- 22. Client's thoughts on the future (p. 15).
- 23. Character and mitigation evidence (p. 16).

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# Special support for pretrial release

NOTE: On the question of pretrial release, special attention should be paid to the information on this page and in Sections 20-22. The 11 red-starred (\*) items on this page likely include special indications of this client's trustworthiness while on release that are overlooked by less-complete risk assessments in common use.

- **\*** a. Highest completed school grade or degree: High school graduate.
- b. Age at first charge (juvenile or adult): 20.
- \* c. Ever charged with anything (juvenile or adult)?: No.
- d. Prior pretrial releases?: No.
- e. Number of times on probation or parole in either juvenile or adult cases: 0. Complied with all terms?: No. I was never on probation or parole.
- f. Extreme hardship to client from pretrial detention?: No.
- g. Extreme hardship to someone else from client's pretrial detention?: No.
- \* h. Good living arrangement plan?: Yes. I would live wherever I was ordered. But my plan would be to go back toiling with my roommate Myron Paine (a completely responsible man with a good job, clean life, and no criminal record).
- \* i. Strength of ties to the community: Strong ties to this community (2 out of 2). All of my ties are here. I was born and raised here. All my schooling and jobs have been here. My friends and girlfriend are here. I actually don't have ties to any other community.
- \* j. Other responsible people in client's life?: Yes. My girlfriend (Chante Farmer), best friend and apartment-mate (Myron Paine), and my parents.
- \* k. Has a current job?: Yes. I believe I can get a job at our neighbor's Phil's Car Wash on Main Street in Elkhart, Indiana. His name is Phil Berebitsky, and he has told my parent I can work for him as soon as I'm out.
- \* I. Other responsible things client will be doing on release?: Yes. I would be abiding by anything the judge told me to do. I think I'd like some counseling for how I got into this--and maybe to take my relationship with Chante to an engagement. She's told me (oddly enough, since I was arrested) she'd like us to consider making a commitment to each other and start some premarital counseling. We just haven't wanted to rush anything, but she says it now feels right to her that we commit to making a life together. She's the most amazing person. I'll never forget what she told me on her visit to me here at the jail when I said I didn't know if she was being smart for raising the idea of marrying me when I couldn't even find a job and made a stupid mistake like this. She said, "I didn't fall in love with a paycheck, I fell in love with you."

I feel in counseling I could also try to handle better the feelings I have about being totally rejected by my dad, mostly rejected by my mom, and handed over to my great-aunt Sophie to raise me. Plus, some of the bad things I saw growing up (violence, shootings, killings, etc.).

- \* m. Special immediate opportunities or circumstances: Yes. Certainly keeping my job is very important to me.
- \* n. Some other reasons client can be trusted: Yes. Well, I can say I'm horrified by this arrest and my incarceration. I know I messed up to be in this situation, but I am 1,000% committed to making this my only run-in with the police.
- o. Amount of bail that could be raised: I think \$1,500.
- \* In Section 21, the client has described plans for changes in 7 matters.
- In Section 22, the client has identified the following Index of Supporters:

1. Chante Farmer:

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- a. Relation to client: Girlfriend.
- **b. Trustworthiness:** Chante is a really responsible person. She's had the same good job for 6 years, gets great job reviews, and is always offered promotions.
- c. Contact information: 574-980-8832 / chantezfarmer10@gmail.com.
- **d.** Specific help: Chante can testify to how I have tried to get my life together, how devoted i am when employed, and how much personal and financial pressure I was under when these undercover officers came again and again to try to deal drugs for them.

#### 2. Myron Paine :

- a. Relation to client: Friend.
- **b. Trustworthiness:** Myron has never been in trouble. We've been friends for 15 years, and he and I rented an apartment together for the last 8 months. He knows this was completely out of character for me and that i wouldn't have done it except that I was hounded by these undercover people trying to get me to help them.
- c. Contact information: 574-499-0128 / PaineMyron5@aol.com.
- **d.** Specific help: Again, he can testify to what a responsible person I am and that I did this only because of the financial bind I was in and because of the pressure these undercover people used on me.

### 3. Alphonso Velazquez:

- a. Relation to client: Mentor and friend, my old high school Police Resource Officer.
- **b. Trustworthiness:** Officer Velazquez has been on the local police department for several years. As a young officer he got assigned to our high school as our Police Resource Officer. He took an interest in me, and I've considered him a friend ever since. He's even tried to contact me at the jail and has left a message that he is going to be over soon to see me.
- c. Contact information: He can be contacted at the local police department. I don't have the number with me. I believe his personal email is OfficerAVelazquez@gmail.com.
- **d.** Specific help: I believe Officer Velazquez would have nothing but excellent things to say about me. He'd help in any way.

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ADULT DEFENSE MAP FOR CHARLIE WILLIAM CALHOUN (CHARLIE), p. 6/17

# Sections

# Part A: Legal

### 1. What's most on client's mind (Up to Flags Page)

The only reason I got these 4 pieces of coke was that a person I knew as Darryl Washington asked me repeatedly to do so. He turned out to be an undercover officer. About 2 years ago, he asked me to find him some coke, but I didn't get him any then.

When I was picked up for this and questioned, I told the officer what I did. He told me that Darryl is "on loan" from the Indianapolis police department and is brought in every so often to make buys. He said I'd be getting 30-40 years in prison.

I can't believe this is fair. And BTW, these 4 sales happened right after Nassau Van Conversions laid off me and about 40 other people as well. It was like 3 months later with my rent overdue, etc. It's like "Darryl" got brought in when we were most desperate. I know of at least 2 other laid-off Nassau employees entrapped by "Darryl."

### 2. Client's safety/Emergency needs (Up to Flags Page)

- a. Client's sense of personal safety: Extremely unsafe. How to put this? I'm a peaceful person in a very unpeaceful place. There are gangs here, and they hate each other, and they hate those of us with no gang connection most of all. There are regular beatings and even some rapes. I have no defenses here.
- **b.** Emergency needs?: Yes. Safety and someone to look at what actually happened here. I feel I was tricked into doing something I never would have done.

#### 3. Case details (Up to Flags Page)

a. Details: I had been laid off for about 3 months from my line job at Nassau Van Conversions. A person I knew as Darryl Washington came around and said he wanted some crack to use.

He had done the same when I was in a similar situation 2 years ago. I listened to him but turned him down 2 years ago.

But, stupid as it was, I got him some crack this time. It was for the 4 sales I'm charged with here. I was financially desperate. Rent was due, I couldn't get out of my lease, I was getting food from friends and family, etc. Unemployment had not started yet.

I've never bought or sold coke at any other time to anyone. I've used marijuana occasionally and have traded it with friends, but never to make money.

#### b. Co-defendants?: No.

c. Contributing factors: I honestly feel this was a trick by the police to catch poor people. It was bad judgment on my part, but I still think this is unfair. The financial pressure I was under, feeling like a failure if I couldn't pay my half of the rent and see my friend/roommate Myron kicked out as well, etc. I also feel my thinking has been messed up since my Great-aunt Sophie (the lady who raised me) died last year. I don't think my thinking has been right at all lately.

I want to say that if I sound mad at the police, it's not how I feel about them as a whole. One of my best friends and supporters is Officer Alphonso Velaquez, a local officer who I've known since he was the Police Resource Officer at my high school.

- **d.** How correct/fair the client considers the charges: Partly correct and fair (1 out of 2). Well, I did these sales, but the charges don't say anything about how Darryl set me up.
- e. Initial comments on evidence and witnesses: Not at this time.
- f. Interaction/statements with law enforcement: When I was arrested, I was read my rights, and I agreed to speak with them at the jail. I told them all of this. They basically laughed and said I'm going to prison.
- g. Client discussions with others about the events?: No.
- h. Victims?: No.

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- i. Thoughts looking back at the events: I honestly feel this is a really bad way to treat people who don't hurt others but are desperate.
- j. Any other current charges?: No.
- 4. Other criminal cases/arrests (Up to Flags Page)
  - a. Juvenile cases: 0.
  - **b.** Other adult cases: 0.
  - c. Any other arrests?: No.
  - d. Other live cases?: No.
  - e. Most shocking/difficult aspects of any (and all) arrests and detentions: Just that I am here in the situation at all. I never imagined it. I've tried to live a good life and just fell for something stupid, I think.
- 5. Other important legal cases (Up to Flags Page)
  - a. Any other legal cases now?: No.
  - b. Past legal cases?: No.

# Part B: Basic Profile

6. Military service (Up to Flags Page)

None.

- 7. Physical health (Up to Flags Page)
  - a. Overall health: Good (2 out of 2).
  - b. History of head injury?: No.
  - c. History of losing consciousness?: No.
  - d. Diagnosed with brain injury or disease?: No.
  - e. Other serious physical problems or disabilities?: No.
  - f. Major surgeries?: No.
  - g. Currently on medications?: No.
  - h. Medical condition making incarceration dangerous?: No.
  - i. Other important medical information?: No.
- 8. Family and other important relationships (Up to Flags Page)
  - a. Currently married?: No.

Currently in a committed or long-term relationship?: Yes.

- 1. Partner's name: Chante Farmer.
- 2. Length of relationship: 3 years.
- 3. Quality of relationship: Good (2 out of 2). She has helped me a lot. These were some difficult times at the beginning with our families because she's white. But we've actually grown close over the time we've been together. She's an amazing and complete person. I don't just love her, I look up to her.
- **b.** Married before?: No.
- c. Children: 0.
- **d.** Most positive and supportive people in client's life: I would definitely say my girlfriend and her family.
- e. Current unhealthy or hurtful relationships?: No.

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f. Other impactful people in client's life currently?: No.

## 9. Education (Up to Flags Page)

- a. Currently in school?: No.
- **b.** Extent/description of education: I graduated from Elkhart High School. I did okay. Graduation rates are low, especially for minority guys, so I was treated as something of a "great kid."
- **c.** Success in school: Some (1 out of 2). Basically a B-/C+ student. I was well liked, played football and ran track, fit in pretty well.

### 10. Employment (Up to Flags Page)

- a. Employed?: No. I'm incarcerated and unable to work. I last worked in 2019.
- **b. Prior work experience:** My last (and most significant) work was between 2013 and 2019 with Hawthorn Reclamations, a small company involved in fixing up low-cost manufactured housing for low-income families. It is owned by Ethan and Jeanette Hawthorn, two really terrific people who try to make a living while doing something great for poor people and for people like me who need a break.

I worked hard to learn everything possible about Hawthorn. I learned construction, plumbing, mold remediation, and even some basic electrical. I advanced to being a supervisor in the restorations and an analyst when fleets of old homes were offered for sale.

Ethan and Jeanette have stayed close friends and want to speak up for me. They can confirm everything I have said here.

c. Any other important information about employment or work history?: Yes. Ethan and Jeanette would like me to go back to work for them anytime I could be released.

#### 11. Use of free time (Up to Flags Page)

- a. Currently: Before I got locked up, with my girlfriend, working out, TV, watching sports.
- b. Consequences from ways client has used free time: Nothing special.

## Part C: Personal Challenges

#### 12. PTSD/Repeating bad memories or nightmares (Up to Flags Page)

- a. **PTSD?:** No issue indicated.
- **b.** Most shocking or upsetting experience: Without question, my arrest in this case and being treated like I'm some sort of scum to the community.

#### 13. Childhood years (Up to Flags Page)

a. Client most wants understood about childhood: It was not a typical family, but I decided I would not be ashamed of my background. My dad had nothing to do with me, and I would see him only by chance. He had his life, and it included some of his other children but not me (I think because he stayed with their moms more--or was at least on good terms with them while he and my mom basically hated each other).

He even insisted I not have his name, so I was given my mom's last name.

My mom has had a lot of problems, including with mental illness. Some of the worst parts of my childhood were seeing her yelled at and hit by a couple of bad boyfriends.

In all this, I was raised mostly by a great aunt (Sophie Calhoun) who died about a year ago. She was a wonderful lady in very difficult circumstances.

Childhood assets. Regarding 17 possible important childhood assets, the client reported the following:

- Present in client's childhood:
  - 1. Other loving family members. My great Aunt Sophie was close to many people, and they

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became my family.

- Somewhat present in client's childhood:
  - 1. All my basic needs. Especially when I was with my mother, things are very difficult. I often had many days without enough food or just a bag of potato chips and water. I almost never was taken to the doctor even when I was seriously sick. I never went to the dentist, and my teeth became a mess. These things were better when I was with my Aunt Sophie.
  - 2. A loving mother who stayed in my life. My mom didn't exactly reject me. But she had so many problems that she couldn't raise me. She was mostly kind to me when she saw me.
  - **3.** Peace within my family as a whole. This depends on what part of the "family" someone is talking about. Within my Aunt Sophie family, there was mostly peace.
  - **4.** A family that was able to have disagreements but then peacefully settle them. With Aunt Sophie, this was pretty good, not at all when with or around either of my parents.
  - 5. A consistently safe home life. Things were completely unsafe in my mom's house (crazy drinking, violent boyfriends hitting her and yelling at both of us, etc.) but good when with Aunt Sophie.
  - 6. A lot of encouragement to do well in school. Aunt Sophie certainly made clear she wanted me to graduate. Not much beyond that. She never came to the school or game, looked at any of my work.
  - 7. An overall good experience with school. I had okay grades (B-/C+). Most of my neighbor guys didn't get past 10th grade, so I guess I did well compared to most.
  - 8. Good friends almost all the time. There were some ways that I didn't fit in. I didn't have a home I could bring friends to. Many guys didn't respect the I even tried in some of my classes. But I had enough "good enough" friends that I wasn't completely alone.
  - 9. The feeling that I would have a good future. Looking back, I'd have to say I just couldn't know what was going to happen in my life. No one talked much about the future, and my mind just didn't go there. I felt a lot of rejection from my parents not being in my life or encouraging me, but I think I just tried not to be angry about all that. So, I'm not sure what my feeling was about a future.
- Missing in client's childhood:
  - 1. A loving father who stayed in my life. My dad rejected me and would have nothing to do with me.
  - 2. Parents who stayed happily together. I never heard a good word between them--or from one about the other.
  - **3.** A lot of admiration from my family and others important to me. "Admiration" isn't a word I think anyone would use about may upbringing. Even Aunt Sophie was a bit of a drill sergeant more than an admiring or encouraging person. Whippings more than admiration.
  - 4. Consistency in the admiration and encouragement I received. This just wasn't a part of my childhood at all. I think it was positive comments from teachers or coaches that first sounded like this. I actually didn't know what to make of it, but it helped me a lot and probably played a big role in my staying school.
  - 5. A family where I could talk about things that hurt or scared me. This just wasn't encouraged or even allowed.
  - 6. A family that took my concerns and wishes seriously. Neither of my parens did this. I'd say Aunt Sophie was concerned about my needs. But my concerns and wishes, not really. (Still, I was very grateful to her.)
  - 7. Adults who responded to my mistakes and misbehavior with positive correction instead of punishment. Yelling and whippings were what they all knew.

## c. Childhood challenges:

- i. Family structure during my childhood:
  - 1. My father's death. This was technically during my childhood. I almost 18 at the time.
  - 2. Unsafe or unhealthy people brought into our home or family life. The unsafe and unhealthy person in my life was brought there by ME. And to him, I was exposed to probably 20 or 30 other very dangerous people.
- ii. Childhood attack or physical abuse (other than sexual):
  - 1. Hit or physically attacked. One of my mom's boyfriends used to hit me with his fists and a belt. It was all just part of the craziness in my mom's life. This was for about 2 years

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when I was 9 or 10--and one of the reasons Aunt Sophie took me in.

- **2.** Threatened with being hit, physically attacked, or injured. This was from the same boyfriend.
- **3.** A crime against me. Ditto.
- 4. Physical abuse by a family member. The same.
- **5.** Violent physical punishment. The same.
- iii. Childhood emotional or verbal mistreatment or abuse:
  - **1.** Emotional (including verbal/spoken) abuse by someone outside my family.

### iv. Family members' functioning during my childhood:

- 1. A serious accident to a family member. The beatings against my mom by her one really bad boyfriend--and a few times from other dangerous men.
- 2. A family member with mental problems. My mom has had real problems. I don't know exactly how they're described. She went to the mental health clinic often. She was just basically a broken-down person.
- **3.** Arrest or incarceration of one or more family members. My mom was arrested I think 3 times for prostitution.

### v. Functioning of the family during my childhood:

- **1.** Times of living in an unfit home.
- **2.** Times without enough food.
- **3.** A legal case or investigation over how I (or another child) was being treated. This was over the beatings by my mom's boyfriend and the general craziness in my mom's life. All of which led to my being moved to my Aunt Sophie.
- 4. Repeated conflict or loud arguments between people I lived with.
- 5. Scary behavior by someone in my family. My mom's whole life was scary.

### vi. As a child, seeing something very upsetting or frightening:

- 1. Seeing or hearing a serious accident or injury to someone. The attacks on my mom.
- 2. Seeing or hearing someone shot. I saw 2 people right after they were shot in our neighborhood. One died.
- **3.** Seeing or hearing someone attacked. These were mostly the attacks on my mom, though there were violent times in the neighborhood.
- **4.** Seeing or hearing someone beaten. The same. The beatdowns on my mom were the hardest to deal with.
- 5. Seeing or hearing a violent fight. The same. The beatdowns on my mom were the hardest to deal with.
- 6. Seeing or hearing someone threatened. The same. The beatdowns on my mom were the hardest to deal with.
- 7. Seeing a dead body other than at a funeral. That person who was shot and dead in our neighborhood.

#### vii. As a child, feeling responsible for something bad that happened:

- 1. Feeling that an accident, death, or other sad or scary event was my fault. I always felt I was supposed to do something about the attacks on my mom. I used to stay up at night imagining what I would do the next time.
- 2. Feeling that I was supposed to stop or fix some problem in my family. This was a constant thought for me, even after I was moved out from my mom's. I was always worried about her and wondering what to do for her. But as I look back on it, I sort of turned inward and quiet about all of it. When my girlfriend ahs talked to me about this, she's asked who I would talk to or turn to for help. That was the first time it was suggested other people dealt with problems by going to other people.

I should have known this and learned this better. Even before giving in to this undercover officer's requests to get him drugs.

#### viii. Other childhood issues:

- 1. Alcohol use. I tried some drinking, but no more than most kids.
- 2. Drug use. I tried some weed, but no more than most kids. Actually, a lot less.
- **d.** Relationship with father (while growing up): I had no relationship with my father (0 out of 2). He wouldn't permit it. He wanted nothing to do with my mom, so nothing to do with me.

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Relationship with father (today): I have no relationship with my father (0 out of 2).

e. Relationship with mother (while growing up): Fair (1 out of 2). I love my mom, but as I've tried to say here, her life has been one piece of sadness on top of another. My Aunt Sophie would remind me it was my mom's job to use the help she was getting. I tried not to worry about my mom.

**Relationship with mother (today):** Fair (1 out of 2). This is complicated. I'd have to think about this and talk about it in person if my lawyer thinks it's important. She's like a person I worry about but don't think of as a mom anymore.

- f. Raised at any time by anyone other than mother or father?: Yes. As I've said, Aunt Sophie and her "family."
- g. Any other serious difficulties in childhood?: No.
- **h.** ACE (Adverse Childhood Experience) Score: 7 out of 10. The client answered Yes to the following standardized questions.
  - 1. Did a parent or other adult often either: Swear at you, insult you, put you down, or humiliate you? OR act in a way that made you afraid you might be physically hurt?
  - 2. Did a parent or other adult in the household either: Often push, grab, slap, or throw something at you? OR ever hit you so hard that you had marks or were injured?
  - 3. Did you often feel either: That no one in your family loved you or thought you were important or special? OR that your family didn't look out for each other, feel close to each other, or support each other?
  - 4. Were your parents ever separated, apart, or divorced?
  - 5. Was your mother or stepmother either: Often pushed, grabbed, slapped, or had something thrown at her? Or sometimes kicked, bitten, hit with a fist, or hit with something hard?
  - 6. Did you ever live with anyone who was a problem drinker or alcoholic or someone who used drugs?
  - 7. Was a household member depressed or mentally ill, OR did a household member ever attempt suicide?

Note: The ACE Questionnaire is credited with establishing the strong link between traumas in childhood and chronic disease and life difficulties in adulthood. The higher the ACE score, the greater incidence of a broad range of adult challenges. See History and Significance of ACE Questionnaire.

i. Any connection between childhood problems and legal problems (including this case)?: Yes. The better answer to this might be, "I don't know." I know Cherie is A LOT better than I am at looking at options and making better decisions. She says that being raised the way I was left me just looking for a way to get to the next minute, instead of making good decisions for the long run.

#### 14. One or more controlling or hurtful partners (Up to Flags Page)

- a. Any current involvement with a controlling or hurtful partner?: No.
- b. Past controlling/hurtful relationships?: No.

## 15. Adult years (Up to Flags Page)

- a. Current life assets. Among 14 possible important life assets, the client reported the following:
  - Definitely present today:
    - **1.** Good physical health.
    - 2. Safety in all parts of my life.
    - 3. At least 3 good and helpful friends I can call on anytime.
    - 4. Volunteer work I like. My girlfriend and I have always liked what we've done at our churches.
    - 5. A safe place to live--without fear of losing it. Obviously jail isn't that safe place, but my girlfriend and family are wonderful support to me.

#### • Somewhat present today:

1. A lot of joy/happiness. I try to stay happy. Some people even say I smile when I shouldn't. I don't know how else to live life. I think I made this decision long ago as a boy, maybe helped by Aunt Sophie, and I don't know another way to move ahead.

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- **2.** A loving and helpful family life. My "Aunt Sophie family" and my girlfriend and her family have given me this. My real family, not at all.
- 3. Work I like. I've liked work and been responsible in it when I've had it.
- 4. A good balance between work, rest, and play.
- 5. Good feelings and trust for police and other authorities. I still have faith in most police, but I think what these police did was so wrong.
- 6. A spiritual life I'm happy with.

### • Missing today:

Good peace of mind/freedom from worry most of the time. This Defense Map actually
has me thinking about this more than I have. I would say that my girlfriend has been right
when she's said I have "a lot of private worries." I've handled situations in my life by
staying "on the surface" (another word from my girlfriend) and pretending it's all okay
underneath.

I think if most people lived inside my mind, they'd see a lot of dark worries that never get talked about much.

- 2. A lot of purpose in my life/a feeling that my life matters to others. I'd like to be of use to others. Some people say it's a good thing to know me. But mostly I think I struggle to move along.
- **3.** Enough money/financial security.
- **b.** Client describes his/her problems in adult life: I need to think about this. Right now, it's this charge.

But I think even this charge may grow out of that pattern I got in (without knowing it) of now sharing about problems. And not going to the right people for help. In the world I grew up in, you didn't do things like what my girlfriend and her friends and family do: go ask for help.

# Part D: Addictive Patterns

### 16. Use of alcohol (Up to Flags Page)

- a. Significant responses regarding use of alcohol: None.
- b. Last used alcohol: About 1 month ago.
- c. Any connection between alcohol and legal problems (including this case)?: No.
- d. Client's belief about having a problem with alcohol: No. I just had never had this problem.

## 17. Use of drugs (other than alcohol) (Up to Flags Page)

- a. Significant drug responses:
  - 1. I've used some illegal drugs. Only marijuana.
- b. Particular drugs used:
  - 1. Marijuana/pot (about 75 times in the last 12 months).
- c. Reflections on drug use: I don't think it's been a problem for me. And if it was, my girlfriend would have me straightened out. But I would gladly give it all up now.
- **d.** Client's belief about having a problem with drugs: No. I've used marijuana to feel better when I was way stressed, and to worry less. My girlfriend disapproves of it, and I love her a lot more than marijuana.
- e. Any connection between drugs and legal problems (including this case)?: Yes. Well, obviously drugs were involved, so Yes.

### 18. Other abuse or addiction issues (Up to Flags Page)

a. Other addictive patterns or harmful habits?: No.

## **Part E: Personal Functioning**

- **19. Mood and functioning issues** (Up to Flags Page)
  - I. Past suicide attempts: No.
  - II. The client's responses don't include indications of the following in the last 12 months:
    - a. Thoughts of hurting others (0 out of 8).
    - **b.** More anger than most people seem to have (0 out of 9).
  - III. Significant responses were given for the following possible mood and functioning issues in the last 12 months:
    - a. Thoughts of hurting myself (8 out of 9):
      - **1.** Thinking about suicide.
      - 2. Sometimes wishing not to be alive.
      - **3.** Thinking of how to commit suicide.
      - **4.** Thinking of when or where to commit suicide.
      - 5. Making some plans on how to commit suicide.
      - 6. Wondering if others would be better off without me.
      - 7. Feelings of not being important or useful to others.
      - 8. Doing really dangerous or risky things that could have led to my being killed or seriously hurt.

**Client's reflections on these 8 responses:** This charge is the last thing I ever thought I'd be involved in. I've been proud about being a credit to my family. But even long before this charge, I've wondered a lot about what's wrong with me that my dad has wanted nothing to do with me.

And that my mom has said a thousand awful things about him. I'm sure she's actually thought she's been helping me by not letting me think he was capable of loving me. But I've always heard this more as a deep criticism of me. And I have never made a manly effort to get her to stop.

- **b. Depression** (10 out of 13):
  - 1. Feelings of doom or hopelessness.
  - 2. Loss of interest in things that used to interest me.
  - 3. Unusually sad—or sad more often than usual.
  - 4. Thinking about death more than usual.
  - 5. Painful feelings of guilt.
  - 6. Painful feelings of being worthless.
  - 7. A lot more trouble getting to sleep.
  - 8. A lot of trouble staying asleep.
  - 9. Unusual fatigue (tired much more than usual).
  - **10.** Problems concentrating or being easily distracted.

**Client's reflections on these 10 responses:** I hate what I've done here and what I've made of my life (very little). It's like my dad was right to abandon me AND that my mom was predicting what would happen to me by what she had to say about my dad.

#### c. Dependence/Codependence (6 out of 13):

- **1.** Fear of losing others' approval if I disagree with them.
- **2.** Fear of people's anger or disapproval.
- 3. Being easily used by someone acting irresponsibly.
- 4. Not enough self-confidence to start projects or do them on my own.
- 5. Feeling I can't take care of myself.
- 6. Making excuses for others.

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**Client's reflections on these 6 responses:** I'm just always tied up with trying to be helpful or important to other people. My girlfriend says I do almost nothing for myself and everything for others, even ones who don't deserve it.

- d. Other mood or functioning issue: None.
- 20. Counseling history (Up to Flags Page)
  - a. In counseling currently?: No.
  - b. Using medications currently for mental or emotional issues?: No.
  - c. Used medications in past for mental or emotional issues?: No.
  - d. Prior counseling/therapy?: No.
  - e. Participation in recovery or survivor groups?: No.

# Part F: Life Patterns and Character and Mitigation Evidence

### 21. Client today (Up to Flags Page)

- a. Some good things in client's life today: My girlfriend. I think that's about it. Maybe the fact that as down as I am about myself, I still want to make something of myself so I can be a help to other people, especially kids and older people.
- **b.** Hard/challenging things in client's life today: This case, feeling I was tricked, and feeling I've blown everything I had going for myself.
- **c.** Spiritual or religious aspects of client's life: I'm a Christian. I don't go to church often. I read the Bible now a lot.
- **d.** Other things client would like attorney to know: As odd as it sounds, people can count on me. At the Boy Scouts and in the families I helped, people used to say I was like a rock.

#### 22. Client's thoughts on the future (Up to Flags Page)

#### a. Wish for changes in the following areas:

1. **Relationships.** I'd like to take Chante up on her wish to take our relationship to another level. She is so special. And she sees so much more good in me than I feel for myself.

Until I got involved with these undercover police to got me to help them, I'd done a good job of being with the right people. Aunt Sophie stressed this over and over. So I've always tried to find good people like Chante and Myron to be with. In the future, I want to be even better at this and to have nothing to do with people who just pretend I can trust them.

- 2. Work/work skills. Obviously, I'd like to work someday where I can't just be kicked out because orders are slow. Even my supervisor used to say, I'm as devoted an employee as you can find anywhere.
- 3. Alcohol or drug use. I think I'd like to walk away from drugs completely, even my using marijuana once or twice a week.
- **4. Counseling.** I would like to have the counseling Chante has suggested we could have--to build a marriage together. But so much of that depends on what happens in this case.

And I'd like to have at least some help to deal with the rejection I felt from my dad and mom and with the shootings and such I saw growing up.

- 5. Finances, spending, and money matters. I'd like to have some money for hard times. I don't buy a lot of stuff, but I haven't been that good at having anything left over. The money problems is partly how the undercover guys broke me.
- 6. Ways of handling problems. As my girlfriend has been saying, I need to learn how to ask for help. That may be true. If so, I need to learn how and not to feel so unworthy of help.
- 7. Better use of a personal strength or skill. If I could be better organized, I think I could make more of my energy and "rock-like" reliability. People in my community don't look to counselors like some white people do, but now I'd be willing.

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- **b.** Client goals: I just don't have enough of a picture of the future right now to have goals. I'm sorry. I will think about this. With great people like Chante and Myron, I have opportunities. But I feel so down and so mad at myself, it's hard to feel I deserve things to be better.
- c. Specific things client thinks a judge would like to see 4 months from now: I need to think about this. As I've worked on this website, I've come to think I need to ask for help more, rather than stay stuck in my just feeling bad. I will think about this some more.
- **d.** Something good the client can imagine coming from current challenges: Maybe. I just don't know right now. I will think about this also.

### 23. Character and mitigation evidence (Up to Flags Page)

- **a.** Best accomplishments: I have been reliable at my work, good to my family and friends, a good boyfriend, and a good volunteer at Boy scouts and my church.
- b. Personal strengths: I've always cared about people, especially kids.
- c. People client is currently helping (or who currently rely on client): Mrs. Oletta Jennings (574-534-9981), Mrs. Olivia Smith (574-880-8711), Mrs. Jacqui Washington (574-534-1809), and Mrs. Darlene Farmer (574-534-2977). These are the ladies I've mentioned before. I help with their yards, walks, homes, and more.
- **d.** Other people client has helped: Helping with kid activities of all kinds at the Boy Scouts and Boys and Girls Club.
- e. Client's Index of Supporters:

#### 1. Chante Farmer:

- a. Relation to client: Girlfriend.
- **b. Trustworthiness:** Chante is a really responsible person. She's had the same good job for 6 years, gets great job reviews, and is always offered promotions.
- c. Contact information: 574-980-8832 / chantezfarmer10@gmail.com.
- **d. Specific help:** Chante can testify to how I have tried to get my life together, how devoted i am when employed, and how much personal and financial pressure I was under when these undercover officers came again and again to try to deal drugs for them.

### 2. Myron Paine :

- a. Relation to client: Friend.
- **b. Trustworthiness:** Myron has never been in trouble. We've been friends for 15 years, and he and I rented an apartment together for the last 8 months. He knows this was completely out of character for me and that i wouldn't have done it except that I was hounded by these undercover people trying to get me to help them.
- c. Contact information: 574-499-0128 / PaineMyron5@aol.com.
- **d.** Specific help: Again, he can testify to what a responsible person I am and that I did this only because of the financial bind I was in and because of the pressure these undercover people used on me.
- 3. Alphonso Velazquez:
  - a. Relation to client: Mentor and friend, my old high school Police Resource Officer.
  - **b. Trustworthiness:** Officer Velazquez has been on the local police department for several years. As a young officer he got assigned to our high school as our Police Resource Officer. He took an interest in me, and I've considered him a friend ever since. He's even tried to contact me at the jail and has left a message that he is going to be over soon to see me.
  - **c.** Contact information: He can be contacted at the local police department. I don't have the number with me. I believe his personal email is OfficerAVelazquez@gmail.com.
  - **d.** Specific help: I believe Officer Velazquez would have nothing but excellent things to say about me. He'd help in any way.
- f. Other information judge/jury should know?: No.

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#### New thoughts

Any new thoughts as a result of using this Defense Map?: Yes. I do want to think more about the changes that have been suggested. This charge is a very VERY hard thing in my life. But so is all the sadness I've felt for years.

**Final information/thoughts client wishes to share:** I just hope people can see this through my eyes and that it's nothing I ever did before or would again.

Notes:



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