



# **Wyoming High School Mock Trial**

## WHSMT Case for 2018 Competition

State of Wyoming  
VS  
Isa Johnson

The case of *State vs Johnson* was written for WHSMT for the Wyoming competition in November 2018. The case includes facts that support and challenge the defendant's use of the state's new Stand Your Ground Law to justify a fatal shooting in a convenience store parking lot.

**Acknowledgements:**

WHSMT coordinators Marguerite Herman and George Powers, who wrote the case, and to prosecutors and criminal defense attorneys who helped edit the materials.

**Disclaimer:**

*State vs Johnson* uses characters and events created for WHSMT. Resemblance to actual characters and events is coincidental.

Download this case at [www.wyomingmocktrial.com](http://www.wyomingmocktrial.com).  
Contact WHSMT [wyomingmocktrial@gmail.com](mailto:wyomingmocktrial@gmail.com).

**DISTRICT COURT OF THE TENTH JUDICIAL DISTRICT  
COUNTY OF CARTER, STATE OF WYOMING  
CASE NO. 2018-CR-20**

**PEOPLE OF THE STATE  
OF WYOMING**

**VS.**

**ISA JOHNSON, Defendant**

**FELONY INFORMATION**

The State of Wyoming, by and through its Deputy County and Prosecuting Attorney in and for Carter County, Wyoming, and in the name and by the authority of the State of Wyoming informs the Court and gives the Court to understand that Isa Johnson., late of the county aforesaid, on or about the 22nd day of July, 2018, in the County of Carter, and in the State of Wyoming, did commit the offense of voluntary manslaughter, in that the Defendant, did unlawfully kill a human being without malice, expressed or implied, upon a sudden heat of passion, in violation of Wyoming Statute § 6-2-105(a), punishable pursuant to Wyoming Statute §6-2-105(b), as more fully described in the affidavit of Officer Gerry Hampton of the Carter City Police Department filed herein, and against the peace and dignity of the State of Wyoming.

RESPECTFULLY SUBMITTED this 1st day of July, 2018.

*Jacob Blair*  
Carter County & Prosecuting Attorney

**DISTRICT COURT OF THE TENTH JUDICIAL DISTRICT  
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**JURY INSTRUCTIONS FOR TRIAL**

The following instructions will be read to the jury prior to deliberations. Counsel may quote or refer to these instructions in their closing arguments.

**INSTRUCTION NO. 1**

The role of a jury is quite different from that of the judge. Your purpose in the trial is to determine the facts and, in our system, that duty is exclusively one for the jury. It is especially important that you are both diligent and conscientious in determining the facts because ordinarily there are no means to correct errors you might make in that regard. You must determine the facts only from the evidence produced here in the courtroom. To do that, you may consider whatever I allow to be presented to you, for example:

1. the testimony of witnesses;
2. documents, photographs, charts, and other papers or things;
3. video or audio tape recordings; and
4. in-court demonstrations.

You must not decide this case upon information that you or other jurors may have received outside of the trial from any source, including but not limited, to radio, television, newspaper, internet, or third parties. However, in evaluating the evidence presented, you may rely upon your common sense and the general insights you have gained about human affairs as a result of your life experiences.

To save time, attorneys sometimes stipulate, that is agree, that certain things are true. You will be told of any stipulated facts and must accept them as proved. Also, if any party admits a fact to be true, you may consider that admission.

You will decide which witnesses you believe and how much weight you assign to testimony. A witness is any person, including a party, who testifies during the trial; it does not matter whether the testimony was in the courtroom or by deposition. In deciding what you believe, you may consider anything about a witness which tends to prove or disprove truthfulness, including the following:

1. the conduct, attitude and manner of the witness while testifying;
2. the physical and mental capacity of the witness to have heard or seen that about which the testimony relates;
3. the ability of the witness to remember and tell you, here in court, what was heard or seen;

4. evidence, if any, of the reputation of the witness for honesty and truthfulness or for dishonesty and untruthfulness;
5. whether the witness has a bias, a prejudice, an interest in the outcome of the trial, or any other motive for not telling the truth; and,
6. whether the facts related are inherently believable or unbelievable.

In evaluating witness credibility, other facts are also important:

1. You should consider statements made by a witness at some other time or place that are either consistent or inconsistent with testimony given in this trial.
2. If a witness admits to untruthfulness at some other time, you may consider that admission but you should take into account all the circumstances surrounding it, for instance, whether it was sworn statement, whether it was made under pressure, whether it was self-serving, and whether it was an important or merely a minor misstatement.
3. If you conclude that a witness has willfully lied under oath about any material fact in this case, you may distrust all of the testimony of that witness. On the other hand, if you think the testimony, or some of it, is reliable, giving fair consideration to all the other evidence, you may accept what you find to be reliable.

Differences between one witness' testimony and that of others does not necessarily mean someone is untruthful. Two persons who witness an incident may see or hear it differently. In resolving differences in testimony, you should consider all the circumstances of the case and whether the discrepancy concerns an important fact or a trivial one.

#### INSTRUCTION NO. 2

There are two types of evidence from which you may find the truth as to the facts of a case - direct evidence and circumstantial evidence. An example of direct evidence is the testimony of one who asserts actual knowledge of a fact, such as an eyewitness. Circumstantial evidence is the proof of facts or circumstances from which the existence or non-existence of other facts may be reasonably inferred. The law makes no distinction between the weight to be given to either direct or circumstantial evidence. Both direct evidence and circumstantial evidence are acceptable forms of proof and should be given the weight you feel is appropriate in light of all the evidence.

#### INSTRUCTION NO. 3

A person is qualified to testify as an expert if [he][she] has special knowledge, skill, experience, training, or education sufficient to qualify [him][her] as an expert on the subject about which [he][she] testifies.

An expert witness may offer opinions on questions regarding the issues in the case to assist you in deciding the issues. You are not bound to accept an expert's opinion as conclusive, but should give it the weight to which you feel it is entitled.

In determining the weight, if any, to be given to an opinion, you may consider the qualifications of the expert, the credibility of the expert, the information upon which the opinion is based, and the reason for the opinion. You may disregard any opinion if you find it to be unreasonable or not adequately supported.

#### INSTRUCTION NO. 4

In determining the weight to be given to an opinion expressed by any witness who did not testify as an expert witness, you should consider credibility, the extent of the witness's opportunity to perceive the matters

upon which the opinion is based, and the reasons, if any, given for it. You may disregard any opinion if you find it to be unreasonable or not adequately supported.

#### INSTRUCTION NO. 5

The law never imposes upon a defendant in a criminal case the burden or duty of calling any witnesses or producing any evidence on the question of guilt or innocence. The burden is always on the State to prove the defendant's guilt beyond a reasonable doubt as to each element of the offense.

#### INSTRUCTION NO. 6

The law raises no presumption against the defendant but rather, the presumption of law is in favor of his innocence. In order to convict the defendant of the crime charged, every material and necessary element to constitute such a crime must be proved beyond a reasonable doubt. If the Jury has a reasonable doubt on any necessary element, it is your duty to give the benefit of such doubt to the defendant and acquit him. This presumption of innocence is not merely a matter of form which the Jury may disregard at pleasure, but rather it is a part of the law of the land. It is a right guaranteed by that law to every person accused of a crime. This presumption of innocence continues with the defendant through all the stages of the trial and until the case has been finally submitted to the jury and until the jury has found that this presumption has been overcome by the evidence in the case convincing you of his guilt beyond a reasonable doubt.

The Information and Statement of the Case are not evidence and may not be considered as evidence of guilt on the part of the defendant. Nothing is to be taken by implication against the defendant.

#### INSTRUCTION NO. 7

The elements of the crime of Manslaughter, as charged in this case, are:

1. On or about the 22nd day of July, 2018
2. In Carter County, Wyoming
3. The Defendant, Isa Johnson
4. Voluntarily
5. Upon a sudden heat of passion
6. Killed a human being.

If you find from your consideration of all the evidence that each of these elements has been proved beyond a reasonable doubt, then you must also consider the issue of self-defense, which will be explained in the following instructions

If, on the other hand, you find from your consideration of all the evidence that any of these elements has not been proved beyond a reasonable doubt, then you shall find the defendant not guilty.

#### INSTRUCTION NO. 8

Self-defense is an issue in this case. The burden of proof is on the State to prove that the defendant did not act in self-defense. Before the defendant can be convicted of any crime, the State must prove beyond a reasonable doubt that the defendant did not act in self-defense. If the State cannot meet this burden, then you shall find the defendant not guilty.

#### INSTRUCTION NO. 9

If the defendant had reasonable grounds to believe and did believe that he/she was in imminent danger

of death or serious bodily harm from which the defendant could be saved only by using deadly force against an assailant, the defendant had the right to use deadly force in self-defense. “Deadly force” means force which is likely to cause death or serious bodily harm.

The circumstances under which the defendant acted must have been such as to produce in the mind of a reasonably prudent person, similarly situated, the reasonable belief that the assailant was about to kill the defendant or do serious bodily harm to the defendant. The danger must have been apparent, present and imminent or must have appeared to be so under the circumstances.

If the defendant believed that he/she was in imminent danger of death or serious bodily harm, and that deadly force was necessary to repel such danger, and if a reasonable person in a similar situation seeing and knowing the same facts would be justified in believing that he/she was in similar danger, the defendant would be justified in using deadly force in self-defense. The defendant would be justified even though the appearance of danger later proved to be false and there was actually neither purpose on the part of the assailant to kill the defendant or do the defendant serious bodily harm nor imminent danger that it would be done, nor actual necessity that deadly force be used in self-defense. If the person so confronted acts in self-defense upon such appearance of danger from honest belief, the right of self-defense is the same whether the danger is real or merely apparent.

#### INSTRUCTION NO. 10

The right of self-defense exists as long as the threatened danger would appear to exist to a reasonable person in the defendant’s position. When the danger would no longer appear to exist to a reasonably prudent person, the right to use force in self-defense ends.

#### INSTRUCTION NO. 11

Generally, the right to use self-defense is not available to an aggressor who provokes the conflict. However, if one provokes a conflict but thereafter withdraws in good faith and informs the adversary by words or actions of the desire to end the conflict and is thereafter pursued, that person then has the same right of self-defense as any other person. The person is justified in using force to the same extent that any other person would be who was acting in self-defense.

#### INSTRUCTION NO. 12

In order to be considered an aggressor, a person must engage in some sort of physical aggression or communicate a threat of imminent use of deadly force.

#### INSTRUCTION NO. 13

A person who is attacked in any place where the person is lawfully present does not have a duty to retreat before using reasonable defensive force, if:

- a) that person was not the initial aggressor; and
- b) that person was not engaged in illegal activity.

Otherwise the law requires a person to retreat rather than take the life of an adversary if there was a convenient mode of retreat without increasing that person’s actual or apparent peril.

If the State has proven beyond a reasonable doubt that the defendant had a duty to retreat and that the defendant could have safely retreated without increasing his actual or apparent peril but failed to do so, then the defendant cannot rely upon the justification of self-defense.

**DISTRICT COURT OF THE TENTH JUDICIAL DISTRICT  
COUNTY OF CARTER, STATE OF WYOMING  
CASE NO. 2018-CR-20**

**PEOPLE OF THE STATE  
OF WYOMING**

**VS.**

**ISA JOHNSON, Defendant**

**STIPULATIONS**

The following matters are hereby stipulated and agreed:

1. All documents, signatures and exhibits, including pre-markings, included in the case materials are authentic and accurate in all respects. No objections to the authenticity of the documents or exhibits will be entertained. However, the parties may dispute the legal or factual conclusions to be drawn from any or all of these items. The parties may make all other objections permitted by the Rules of the Competition and the Rules of Evidence, subject to the following exceptions:
  - a) Exhibit 2, the toxicology report, is admissible without further objection.
  - b) Exhibit 1, the drawing of the scene, is not to scale and may not be challenged on that basis.
2. Jurisdiction, venue and chain of custody of the evidence are proper and may not be challenged.
3. All statements of witnesses and all evidence and exhibits were constitutionally obtained and may not be challenged or excluded on that basis.
4. The exhibits that may be used in the case will be identified and numbered as follows:
  - Exhibit 1: Diagram of Scene, prepared by Sgt. Gerry Hampton
  - Exhibit 2: Toxicology Report of lood sample from Aaron Brown
  - Exhibit 3: Photograph of Box of Diapers (2)
  - Exhibit 4: Receipt from Gas-N-Go
  - Exhibit 5: Photograph of Isa Johnson's Tokarev 7.62 pistol
  - Exhibit 6: Resume of expert witness Mickey Norris
5. Aaron Brown died as a result of gunshot wounds that he received at the Gas-N-Go on July 22, 2018. He was hit three times in the chest and the immediate cause of death was blood loss. Three bullets were found and recovered at autopsy. Forensic examination linked all three to defendant Isa Johnson's pistol.

**DISTRICT COURT OF THE TENTH JUDICIAL DISTRICT  
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**PEOPLE OF THE STATE  
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**VS.**

**ISA JOHNSON, Defendant**

**CASE SUMMARY FOR 2018 WHSMT: STATE VS JOHNSON**

On Sunday, July 22, 2018, Carter City was buzzing with activity. The Carter County Fair was in full swing and tourists from across the country had flocked to town for the Finals of the “Mother of Them All” rodeo. Aaron Brown and Cameron Drake were two friends and rodeo fans from Colorado, who had loaded up their two small children ages 2 and 4, and made the long drive to Carter City for the big show.

After a busy day at the fair and rodeo, it was time to head home. Aaron Brown needed to buy diapers for his 2-year-old, and they needed to buy gasoline for Brown’s pickup truck before heading home. They stopped at the local Gas-N-Go for fuel and diapers. The lot was pretty full, but there was an open handicapped slot near the front door. Drake, the driver, was a disabled vetera but was driving Brown’s vehicle with no handicapped sticker. Nevertheless, Drake pulled into the space and Brown went inside the store to purchase a box of diapers.

Shortly after Brown went into the store, defendant Isa Johnson approached the car. Johnson’s spouse had great difficulty walking and depended on use of parking spaces reserved for handicapped individuals. Johnson had taken on a personal crusade to make sure that handicapped spaces were used by handicapped people and no one else.

Johnson accosted Drake and demanded that the car be moved immediately. Brown came out of the store and intervened. Harsh words were exchanged. At some point Johnson either was pushed or tripped and fell to the pavement. Seconds later, Johnson, who had a concealed carry permit, drew a Tokarev handgun and shot Brown.

Johnson has been charged with manslaughter in the death of Brown. Johnson also has been charged with criminal assault on Drake. However, Johnson has asserted self-defense and denies committing any assault on Drake. Johnson also insists that this case is covered by the new “Stand Your Ground” statute, W.S. § 6-2-02, which provides:

- (e) A person who is attacked in any place where the person is lawfully present shall not have a duty to retreat before using reasonable defensive force pursuant to subsection (a) of this section provided that he is not the initial aggressor and is not engaged in illegal activity.

Subsection (a) of the statute says:

(a) The use of defensive force whether actual or threatened, is reasonable when it is the defensive force that a reasonable person in like circumstances would judge necessary to prevent an injury or loss, and no more, including deadly force if necessary to prevent death or serious bodily injury to the person employing the deadly force or to another person. As used in this subsection, “necessary to prevent” includes a necessity that arises from an honest belief that the danger exists whether the danger is real or apparent.

**Prosecution Witnesses:**

Cameron Drake: driver of pickup truck in space reserved for handicapped parking  
Eddie Falco: manager officer of the Gas-N-Go  
Gerry Hampton: police officer first on the scene after the shooting

**Defense Witnesses:**

Isa Johnson: defendant  
Kelly Landon: friend of defendant who was present at the time of the shooting  
Mickey Norris: expert witness, retired police officer and self-defense instructor  
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1     **AFFIDAVIT OF Cameron Drake**

2     STATE OF WYOMING     )  
3                                     )     SS  
4     COUNTY OF CARTER     )

5  
6             My name is Cameron Drake. I live at 342 East Reno Road in Grayrock, Colorado. I am  
7     35 years old and a veteran of the United States Army. I served two tours of duty in that sandbox  
8     they call Iraq. On the second tour my Humvee was hit by a rocket grenade and I lost my left leg  
9     below the knee. I have a prosthetic leg, so I can get around, but it’s hard.

10            Since being discharged, I have earned my associate’s degree in computer drafting and  
11     I am a technician in an architect’s office in Grayrock. I was married, but I am divorced. I have  
12     joint custody of my daughter, Dakota, who just turned 4 years old.

13            Aaron Brown was my best friend. We had known each other since grade school in  
14     Casper. We did everything together – camping, double-dating, high school band (I played  
15     clarinet and Aaron played trumpet). He wasn’t the biggest guy, but he knew how to handle  
16     himself and he was always sticking up for me and other friends.

17            We both joined the military right out of high school. It was the first time we ever split up.  
18     I went into the Army. Aaron joined the Navy. When I was sweating it out and dodging bullets in  
19     Sadr City, Aaron was based in Honolulu, attached to naval intelligence. We kept in touch, mostly  
20     through Facebook. When I got injured, I spent a lot of time in Veterans Affairs hospitals and then  
21     left the Army and came home to Casper. I got my Associates Degree from Casper College, met  
22     someone, got married, had a child. Then my marriage fell apart last year. Aaron was out of the  
23     Navy and was living and working down in Longmont, Colorado. We got together a lot and he  
24     really helped me through a bad time in my life, telling me to get over my anger and focus on my  
25     daughter.

26            Aaron also had a child, a little boy, with his girlfriend. He was a real good dad and took  
27     care of little Cody most of the time. He was so good with that little boy.

28            We got together a lot last spring. It’s just a 30-minute drive from Longmont to Grayrock.  
29     Sometimes we would drive up to Casper to see our folks. Of course, we always took the kids.  
30     Sometimes we would take day trips to do fun things with the children, like we did last July. We  
31     thought it would be fun to go to Carter City, about three hours north in Wyoming, to see the  
32     fair and rodeo. We both thought that a little change of scenery and a day of corndogs, rides and  
33     roping would be good for the kids and ourselves, so early on the morning of July 22, we loaded  
34     up and headed north in Aaron’s truck.

35            It was a wonderful day at the fair. We bought cowboy hats for the kids and cruised the

36 midway until it was about 1 p.m. and time for the rodeo to start. It was hot, and we bought sodas  
37 for the kids and had a few beers ourselves. I limited myself to two beers, and I think Aaron had  
38 a few more than that – maybe four. He wasn't drunk or anything. But he wasn't a heavy drinker  
39 and I guess he had a light buzz, if you know what I mean. Anyway, when we got ready to head  
40 home, we agreed I should drive. Better to be safe than sorry.

41 As we were leaving the fairground parking lot, Cody needed a diaper change but we had  
42 used our last one back at the rodeo. We needed to fuel up anyway and I saw a Gas-N-Go store up  
43 ahead on the corner. I thought we could stop in, get some gas and pick up some diapers for Cody.  
44 Aaron agreed to run into the store, pick up the diapers and pre-pay for the gas, while I stayed  
45 in the car with the kids. When I pulled in it looked like every parking space in the lot was full  
46 except for a handicapped spot by the front door, so I took it. Now I have a handicapped sticker  
47 for my car due to my disability, but that sticker wasn't on Aarons pickup – obviously. It was  
48 going to be just a few minutes, not a big deal. I rolled down my window to get some fresh air,  
49 while we waited for Aaron to buy the diapers, pay for gas and come back out.

50 As soon as Aaron went into the store, this person came up to the truck, looking inside  
51 and walking around it. I tried to ignore him/her, but it seemed like he/she was getting worked up.  
52 Yeah, I later learned that this person was Isa Johnson, the one who ended up shooting my friend.  
53 The next thing I know, this person starts kicking the bumper and yelling that I had no right to be  
54 there. Then he/she came around to my door – right in my face, you know? – and yells, “You’ve  
55 got a lot of nerve, you lazy jerk! This space is reserved for people who need it. Get your sorry  
56 Colorado butt in gear and move it, before I reach in there and pull you out of there by your neck.”

57 I was just shocked, and the kids were getting upset. So, I leaned out of the window and  
58 asked Johnson to please quiet down and stop making the kids afraid, but that just seemed to be  
59 like throwing gas on a fire. Johnson started banging on the hood – I don't remember if his/her  
60 hand was open or in a fist -- and yelling for someone to call the police. I told him/her to settle  
61 down and we'd be leaving soon. I also said something about my military training and knowing  
62 how to defend myself.

63 Then Johnson grabbed for the door handle and screamed, “Don't you threaten me!” and “I've had  
64 training, too, and I've got my own protection right here on my belt. If you don't get that rig out  
65 of that space right now, I'm not gonna be responsible for what happens if I have to use it.” I was  
66 able to lock the door, but then Johnson reached inside through the open window and grabbed my  
67 shirt. I didn't know what this old bird was capable of and I was seriously afraid for myself and  
68 the kids.

69 Just then Aaron came out of the store. He was carrying a box of diapers by the handle. I  
70 think he must have heard Johnson and all the commotion while he was in the store, but I know he  
71 went straight up to Johnson and said to calm down and step away from the truck.  
72 Aaron's tone of voice? I'd say he was firm, but not aggressive or angry, not something to make

73 you afraid. Just enough to know he was serious, when he said to back off.

74 Johnson came unglued and started to yell at Aaron saying something like, “If you want  
75 to start something, I’m just the one to take you down a peg or two. I don’t care how big you  
76 are, because I have something right here on my belt that will even any score.” Johnson started  
77 coming at Aaron and I was afraid Johnson was going to throw a punch. Aaron used the diaper  
78 box to push Johnson in the chest. Aaron was holding the box with two hands, one on each  
79 side, when he shoved Johnson. It wasn’t that hard. But it must have taken Johnson by surprise,  
80 because the next thing I saw was Johnson on the ground. I know Johnson says she/he was  
81 knocked down, but what I saw was Johnson trip over his/her own feet and fall backward.

82 I didn’t want things to escalate any further. I just wanted to leave. So I told Aaron to get  
83 in and I started the truck. Aaron shrugged, turned and started to walk around the back of the  
84 truck, away from Johnson, to the passenger side. Then I heard the sound of a gun being cocked.  
85 I looked over at Johnson and saw he/she had pulled a pistol and that sound must have been the  
86 sound of the slide being thrown and a bullet being jacked into the chamber. Aaron must have  
87 heard the same thing, because he turned around to face Johnson, who had stood up and was  
88 pointing right at Aaron, and they were looking right at each other. Aaron was still holding those  
89 diapers with both hands. Nobody said anything, until I shouted, “No! Don’t shoot!” But it  
90 was too late. Johnson opened fire. They were just six or eight feet apart. At that range Johnson  
91 couldn’t miss. I watched helplessly as my best friend was shot three times in the chest and fell to  
92 the pavement.

93 After that it was pandemonium. The kids were crying. People came running out of the  
94 store, one cop came, then other police and ambulance.  
95 Johnson looked around and said real loud and excited, “Did you see that? I’m not going to be  
96 pushed around. I’m standing up for myself!”

97 I couldn’t believe what just happened. The kids were screaming, and I tried to calm them  
98 down. I knew I had to stay there and tell police what I saw, and that’s what I have done. I don’t  
99 care what anyone says. My friend was murdered. Johnson was looking for a fight and Aaron was  
100 just trying to protect us. Johnson had no right to kill my friend.

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Cameron Drake

Cameron Drake

July 30, 2018



36 One time last May I had a customer come in and tell me to control that self-appointed parking lot  
37 monitor. The customer said he had explained that he just needed to run in and pre-pay for some  
38 gas, but Isa seemed to take this as an insult and had pulled a gun out of a holster he/she wears on  
39 his/her belt. Now I did not see anything, but I made a point of talking to Isa the next time I saw  
40 him/her. I told Isa to just let me know if there was a problem. Isa just said, “Anyone who takes  
41 those spaces away from handicapped people who really need them deserves whatever happens  
42 to them. Who do they think they are!?! I am the only one around here who cares enough to do  
43 anything.”

44 Getting back to what happened on July 22, like I told you, I was the only person on  
45 duty at the store and I was busier than a one-armed paper hanger. I did not see the pickup from  
46 Colorado pull into the lot or notice where it parked. I do remember a person, Aaron Brown,  
47 came in and asked where we kept the diapers. That’s one of our biggest selling items, so we keep  
48 diapers well stocked. When you need diapers ... Anyway, so I directed this person to aisle 6 and  
49 rang up the sale.

50 As I was finishing the transaction, I remember hearing a ruckus out in the lot. It was Isa,  
51 and he/she was kicking this truck parked in the handicapped space and yelling at the driver. The  
52 driver’s window was down and the driver was leaning out and jawing back at Isa. I could hear  
53 Isa saying that the driver had to move the truck because it was illegally parked in a handicapped  
54 space. I could also hear the driver saying something about being a disabled veteran -- injured  
55 protecting the country. Well, that seemed to set off Isa even more and I heard Isa say, “You’re a  
56 no good dirty liar. If you had a disability, you would have a sticker. Why don’t you just get out  
57 of that truck and I can arrange it so you are disabled when you leave this town.” This Brown guy  
58 could hear everything as well and the next thing I know he throws down a \$20 dollar bill, grabs  
59 the diapers and runs out into the lot without even waiting for change.

60 By the time Aaron Brown gets out there, Isa is moving toward the driver’s door. I  
61 couldn’t make out what they said, because everyone was shouting at the same time. But I did  
62 see Aaron push Isa back with the box of diapers. Isa appeared to stumble and fall back onto the  
63 pavement and Aaron told Isa to stay down there, because they were going to leave. Aaron turned  
64 and started to walk away, but then he stopped, turned and it looked like he took a step or two  
65 toward Isa. That is when I heard the first shot. That was followed by two or three more shots  
66 and Aaron fell to the ground. I did not know where the shots had come from, but then I saw Isa  
67 stand up, holding a pistol.

68 Well, I called 911 and reported a shooting right away. Isa stood there the whole time,  
69 looking at Aaron and that pistol. I ran out the front door and yelled, “What is going on?!” Isa just  
70 stood there and never said anything to anybody. Aaron had been hit in the chest at least three or  
71 four times and there was a lot of blood. Within minutes a policeman arrived and an ambulance  
72 followed shortly thereafter.

73 I know that Isa is on a mission about handicapped parking, because of Randy, who has a  
74 real hard time making it in the store with a walker. Isa is a crusader for the rights of the disabled.  
75 I guess that is why he/she seems to take it so personally, whenever someone without the proper  
76 sticker uses a handicapped space. I guess that may explain some things, but I still don't know  
77 why or how this all had to end up with a dead man lying in my parking lot.

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Eddie Falco  
  
Eddie Falco  
July 29, 2018



36 On July 22, I went on shift at 8:00 a.m. and had a quiet morning. Things always pick  
37 up, when the rodeo lets out and I was out on patrol, when I got a call at 3:58 p.m. from dispatch  
38 about a shooting at the Gas-N-Go on Custer. I immediately drove to the location and arrived at  
39 4:02 p.m. I exited my vehicle and saw a body on the asphalt directly in front of the store, on his  
40 back, next to a pickup truck. He was in a pool of blood. There were two or three people bending  
41 over the body and a crowd of about 10 people were standing round.

42 I called for ambulance and additional police and immediately began to look for the  
43 shooter. I saw a person sitting on the curb by the door of the Gas-N-Go, and I immediately  
44 recognized him/her as Isa Johnson. I saw that Johnson was holding a pistol, and I remember  
45 wondering what the heck was going on. I have known Isa for years and I can tell you that I have  
46 never even heard of him/her causing any kind of problem. Of course, we all knew about Randy's  
47 accident. We would occasionally get a call from Isa complaining about folks' parking improperly  
48 in handicapped zones. We even got calls from people complaining that Isa was harassing them,  
49 but that is pretty minor, and we let it go. In fact, after Randy was hurt, it seemed that you rarely  
50 even saw Isa out of the house. But there he/she sat with a powerful firearm, and I had a body  
51 down. The first thing I did was to secure the weapon.

52 I got down behind the rear end of a pickup truck that was parked next to Isa and used the  
53 truck to shield myself. I drew my weapon and told Isa to drop the gun. Isa looked at me with a  
54 blank expression. I don't think Isa even recognized me. I repeated my command, louder this time.  
55 "Drop the gun, Isa." Isa seemed to focus then, and he/she looked at me. Isa said, "It's okay,  
56 officer. It's my gun. I killed him. That guy is not going to give anyone any more trouble. I was  
57 just about to call you guys to report these people, when that guy came at me." Then he laughed --  
58 kind of a chuckle and a smile.

59 Finally, Isa put the gun down on the pavement and I picked it up and secured it. I removed  
60 the clip and ejected the round in the chamber. I told Isa to stand up so I could search for other  
61 weapons. I didn't find anything. I told Isa to sit down again. He said he was not injured. I turned  
62 my attention to the man lying on the ground. I walked over to him to assess his condition. I could  
63 see at least three bullet wounds in his chest area. He was trying to say something. I bent down  
64 and heard him say, "Is Cam okay? Did that crazy old bird get into the car?" He closed his eyes,  
65 shuddered and was gone. I couldn't find a pulse and knew he was dead. I ordered everyone at the  
66 store to stay until they could be interviewed.

67 I tried to get some preliminary information, while waiting for the ambulance and other  
68 officers to arrive. That was when the driver of the truck I had used as a shield got out and yelled  
69 at me, "Do your job! That crazy old bum over there just shot my friend and you're just standing  
70 there. Arrest him/her. He/she just murdered the father of this little boy right in front of him.  
71 What kind of place is this?!" Then the driver began to move toward Isa, who was still sitting on  
72 the curb, and so I stepped between the two and prevented any contact.

73 I told the driver, later identified as Cameron Drake, to get back in the truck and wait for  
74 me there. I told Isa to get up and walk to my patrol car. I locked Isa in the back seat. I began the  
75 process of trying to figure out what had happened. I saw store manager Eddie Falco in the crowd  
76 and asked for a quick report. Eddie said that Isa was having an argument with the person in the  
77 truck, while the deceased was in the Gas-N-Go buying some diapers. The deceased had rushed  
78 out and confronted Isa. Something happened and Isa fell back onto his/her backside. Eddie  
79 couldn't see whether anyone had thrown a punch, but the deceased seemed to turn away for a  
80 second and then turn and take a step toward Isa. The deceased was still four or five feet away  
81 from Isa, when suddenly Eddie heard shots.

82 Next I went over to the person in the truck and asked for identification. The driver gave  
83 me a Colorado driver's license with the name Cameron Drake, aged 35. I asked what happened  
84 and was told, "That old bum came up out of nowhere and started hassling me. He/she was  
85 saying I had to move or there was going to be trouble." Drake said Isa was using loud and  
86 abusive language, which upset the small children in the car. Drake saw Isa reach for the door  
87 handle, so he/she locked the door. The window was down. Drake said Isa reached in apparently  
88 in an attempt to grab Drake's shirt. Then the deceased, identified as Aaron Brown, came out of  
89 the store with his purchase and approached Isa. According to Drake, Brown was holding a box  
90 of diapers with two hands in front of himself the whole time and then turned, as if to walk back  
91 around the rear of the truck to the passenger door. Brown stopped and turned back to Isa and then  
92 there were shots.

93 I turned my attention to Isa, who was still in the back of my patrol car. I read Isa his/  
94 her Miranda rights. Isa was obviously upset, breathing hard and with tears in his/her eyes as we  
95 spoke. Isa. Said, "I can't believe this happened. It was so strange. I was mad then. I was afraid.  
96 And then all of a sudden my gun was in my hand and it seemed to go off by itself."  
97 I asked Isa what Aaron had done and Isa said, "He pushed me down. He was going to kill me."  
98 Isa said he/she wanted a lawyer, so my questioning stopped.

99 By 4:15 p.m. the detectives from the Carter City PD arrived to work the scene, collect  
100 evidence and interview witnesses. I gave a verbal report and Detective Dale Evans assumed  
101 control over the scene. I drove to the police station and completed my report. I made a diagram  
102 of the scene based on what I observed when I arrived, including the location of the truck,  
103 Johnson, the deceased and some of the witnesses.

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*Sgt. Gerry Hampton, CCPD*

Sgt. Gerry Hampson, CCPD  
July 25, 2018



36 doctor's appointments, haircuts and other routine activities. One of the things you find out, when  
37 you are living with a disabled person, is that just about everyone ignores the law, when it comes  
38 to parking in handicapped spots. I will confess that this has become a bit of a personal crusade  
39 with me. Whenever I see a car parked in a handicapped spot that does not have the proper  
40 stickers or decals displayed, I see red. I go up to people and give them a piece of my mind. I take  
41 down license plate numbers. I call the cops. Most of the time, people complain, but they move  
42 their car or truck. But from time to time things get physical, and I've had to stand up for myself.  
43 One guy even took a swing at me down at the Gas-N-Go on Custer Avenue. But I stood firm. He  
44 got the message and backed right down, when I showed him that I had my friend Tokarev.

45 I use a holster that attaches to my belt. It looks like a cell phone case, so it isn't obvious  
46 that I am carrying, but my gun is ready when I need it.

47 July 22, 2018, was a pretty rough day. It started out when found a drunk passed out on my  
48 front lawn, first thing in the morning. I guess he had had a few to many the night before at the  
49 Silver Stetson Bar down the street. I swear every year the rodeo crowd that comes to town for the  
50 "Mother of Them All" seems to get less interested in watching the rodeo than they are in getting  
51 falling-down drunk and trashing the town. So, I called the cops and soon that cowboy was on his  
52 way to the drunk tank to sleep it off. Later that afternoon, Randy asked me to go over to the Gas-  
53 N-Go to pick up a newspaper. Randy can't go to the rodeo, but that doesn't stop him/her from  
54 enjoying the stories in the local paper, particularly the ones about the local kids riding in the big  
55 show. I had been working in the yard and was pretty tired, but I can't tell Randy "No." So I put  
56 on my boots, put my pistol in my belt holster and headed out on the errand.

57 The rodeo had just gotten out and traffic was terrible. The parking lot at the Gas-N-Go  
58 was pretty full, but there were still some empty spaces in the back. I was visiting with my friend  
59 Kelly on the bench in front and was going inside to get a drink. As I was walking up to the front  
60 door, I saw a truck with Colorado plates sitting in the handicapped space. The driver was sitting  
61 in the truck and, as I walked up, I checked the truck to see if there was any kind of handicapped  
62 sticker or decal. I did not see anything, so I stopped and spoke to the driver through the open  
63 window. I pointed out to the driver that the truck should not be parked there and that there were  
64 open spaces in the rear. At first the driver ignored me, but I finally got a reaction, when I tapped  
65 on the hood. At that point the driver leaned out the window and shouted at me to leave the truck  
66 alone. The driver said, "Back off, you old coot. Don't you dare touch this truck. I have as much  
67 right as the next person to park here when I want and for as long as I want."

68 I was being very reasonable up to then, but that got under my skin. I told the driver that, if that  
69 truck was still there when I came out of the store, then we were going to have a problem. I don't  
70 remember my exact words. I probably raised my voice.

71 Just then, another person appeared out of nowhere. I had never seen this person before  
72 in my life, but he was big and he pushed his way into my face and said, "Don't you ever talk to

73 my friend like that, you---". Well I can't repeat what he called me, it was pretty bad. Some rough  
74 language I'm not used to hearing. He was carrying a box in one hand and used it to pushed me  
75 backwards, and I went down. He said, "We'll move when we are good and ready to, and in the  
76 meantime you better just sit down there and stay there, if you know what is good for you."

77 When I tried to get up, he pushed me down again and raised his fist. Then he turned to the  
78 driver and I heard him say, "Come on, Cam. Climb on out of that truck and let's teach this idiot  
79 a thing or two about manners." Then he turned back toward me and took a step. I was scared for  
80 my life. I was in a panic. From where I was lying, it looked to me like this guy was getting ready  
81 to attack me. That one guy was big, and I wasn't going to be able to handle the two of them.

82 So, I did what I had to do. I pulled out my old Tokarev and fired. Three times. The big  
83 guy went down and the person behind the wheel of his truck didn't move but started screaming,  
84 "What did you do?"

85 I got up, dusted myself off and went over to sit on the curb. My heart was racing and I felt  
86 sick. I had never shot anyone before and I hope I never have to again. Somebody came up and  
87 told me to sit tight and say nothing. It was my friend, Kelly Landon. Kelly said he/she saw and  
88 heard everything. Kelly said, "That guy just got what he deserved. You had every right to stand  
89 your ground."

90 I am very sorry about this whole thing, but the only reason I shot Aaron Brown was  
91 because I was afraid for my life. Yeah, I was mad about them being parked where they had no  
92 business being parked and I did not like getting shoved to the ground, but it never occurred to me  
93 to shoot anyone, until I heard Mr. Brown telling his friend that they were going to "teach" me a  
94 lesson. I have no doubt that, if I had let that guy take one more step, it would have been me in the  
95 back of that ambulance and not him.

96 Sometimes I get a little loud when I think people are breaking the law and trying to push  
97 me around. But I know when to stop and leave things to the police. I don't go around threatening  
98 people. Why did I use my gun? That was a last resort, something I did in fear for my life. I was  
99 standing my ground. I had to shoot.

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Isa Johnson

Isa Johnson  
July 25, 2018



36 buying drinks, when we saw a big guy pick up a six pack of drinks and run out the front door.  
37 Isa grabbed a spray can of paint and ran out after him, right to his car, and spray paint all over  
38 the windshield. Then he sprayed the guy when he started to get out. He was hoppin' mad, but Isa  
39 didn't back down. The cops arrived just then. It was pretty funny at the time, although I thought  
40 about it later and was glad no one got really hurt.

41 I tell that story to show that Isa may be small, but he/she has a strong character. Isa won't  
42 start a fight, but once it starts he/she will finish it.

43 So, back to last July 22. It was hot, and Isa and I were enjoying a cold drink at the Gas-  
44 N-Go and talking about how we were glad to see the end of the rodeo and fair and all the noise  
45 and traffic and out-of-town yahoos running wild. We were sitting on the bench right there by the  
46 front door. Then we see this pickup truck pull up into the handicapped spot right in front, and  
47 the passenger got out and walked right in. There sure didn't seem to be anything wrong with  
48 him. Right away, we notice the Colorado plates. I think I groaned out loud. Anyway, Isa said he/  
49 she was going to check it out. I know what Isa was doing – checking for a handicapped parking  
50 sticker.

51 Isa walked around the pickup and then went to the driver's door and started talking to  
52 the driver through the open window. I couldn't hear exactly what Isa or the driver said. It started  
53 out calm but then pretty soon it got a lot more excited. Isa took a step back, and the driver was  
54 yelling, "Get out of my face," or something like that, and waving his/her fists around. Isa stepped  
55 toward the front of the car, patted the hood of the car and kicked the left front tire and kept telling  
56 the driver he/she should be ashamed about using a handicapped parking place. I know now that  
57 the driver was actually a veteran and handicapped, but Isa had no way of knowing at the time.

58 So then the passenger came barreling out of the store carrying a box and he came right for  
59 Isa. He was big and tall, and he looked like he was ready to take Isa down. I heard him yell, "Get  
60 out of here, you old bum. Get out of my friend's face. Or I'll take care of you permanently!"  
61 That's when he swung at Isa and hit Isa with that box. The impact knocked Isa back and down on  
62 the pavement hard. Isa was trying to scoot backwards, while this guy stood there with that box in  
63 one hand and his other fist clenched. He could have taken out Isa with just one swing, and I was  
64 afraid for my friend. That big guy never stepped back. In fact, I think he stepped toward Isa, who  
65 was trying to scoot back. The driver of the truck was chipping in as well, urging the big guy to  
66 teach Isa a lesson.

67 I know Isa was scared too. I could see it. Who wouldn't be. Things were happening so  
68 fast. I saw Isa reach inside his/her coat and bang, bang, bang! The other guy just collapsed and  
69 fell back. And that's where the cops found him.

70 Isa crawled over to the curb and sat there, shaking and breathing hard and still holding  
71 the gun. I went over and patted him/her on the back and asked "Did that guy hurt you?" Isa just  
72 looked at me and didn't say anything at first. So I asked Isa again "Are you okay?" and that is

73 when Isa says to me “I’m fine, but I guess that one isn’t. Too bad, but what else was I supposed  
74 to do. He had it coming.” So I said, “Don’t worry. It’ll be alright. You had no choice. You were  
75 just standing your ground, Isa.”

76 Then the cops started arriving and I stood back with the other people at the store. I gave  
77 a statement right away and I gave this sworn statement and I will testify in court. Isa is a good  
78 person who is doing his best to live a good and honorable life. Isa is not violent, but he/she has a  
79 character that stands up for what’s right. And that’s just what he/she did that day.

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**Kelly Landon**

Kelly Landon  
Aug. 5, 2018



36 should know how to avoid situations where the likelihood of needing to fire the gun is high. You  
37 must be able to “read” the environment around you, which includes people. I teach people not to  
38 look for trouble. If you are walking down a street and see a situation ahead that seems sketchy,  
39 turn around and find a different route. If you are in a bar and some obnoxious character gets into  
40 your face, pay your tab and move on. Unfortunately, too many people think that “stand your  
41 ground” means they have the right to insist that the other person back off in every confrontation  
42 or face the consequences. A gun is no substitute for good sense.

43 My students frequently ask me to explain these new Stand Your Ground laws, specifically  
44 asking when they can use the defense provided by the law. I am not an attorney, but the law  
45 seems to be written so it does not cover someone who creates a situation that later turns violent.  
46 I tell people Stand Your Ground is not a license to be reckless with a deadly weapon. If you are  
47 threatened and cannot get away, then the law may help, but I still say move on, if you can do so  
48 safely. Any time someone gets shot, there are going to be police and lawyers involved and anyone  
49 telling you that they can predict how everything is going to work out is a liar.

50 Another part of education involves practice. This means more than spending time at the  
51 range practicing shooting skills. It means carrying a weapon regularly, so a person becomes  
52 accustomed to how it feels and how to access the weapon easily when it is needed. If you carry a  
53 gun every day, you will be ready to react automatically and will not be taken by surprise. People  
54 who fumble for their weapon or who have to think to disengage the safety are people who end up  
55 dead.

56 Another important issue for my armed clients is anticipating what it will feel like to  
57 draw, aim and fire at another person. There is a world of difference between shooting at silhouette  
58 targets and a living breathing person. There really is no training that can prepare a civilian for  
59 what it feels like. In the critical moment, time may seem to speed up for some and slow down  
60 for others. You may or may not hear what is going on, because you are so focused on the threat in  
61 front of you and the actions you are taking to remove that threat. People who have been involved  
62 in a shooting are often poor witnesses, because nothing in their previous lives has prepared them  
63 for the series of split second decisions that they must make. This applies to more than the events  
64 leading up to the shooting. Afterwards the shooter will often appear to be aloof or even divorced  
65 from the reality of what has just happened. Most people involved in a shooting suffer from  
66 a degree of shock, both because of the incident that caused the threat to begin with as well as  
67 because of the impact of having to shoot another person.

68 In this case, I was contacted by the attorneys for the defendant, Isa Johnson, and asked  
69 to review the file materials and determine whether or not a reasonable person in his/her position  
70 would have had a reasonable basis to fear for his/her safety. I am not here to tell anyone whether  
71 Mr. Johnson is innocent of the charges against him/her. That is for the jury. But I can offer my  
72 experience, education and training as a resource to the jury, when they go back to deliberate

73 Mr. Johnson's fate. I am being paid for my professional services. I charge \$250/hr for my time  
74 investigating the matter and \$400/hr for my time testifying. My bills prior to the trial have totaled  
75 \$2750.

76 In my expert opinion, Johnson was faced with a situation that presented an imminent  
77 threat. What may have started as a verbal argument over a parking space took a tragic turn, when  
78 Mr. Brown struck Johnson and he/she was knocked down. At that point Mr./Ms. Johnson was in  
79 a very vulnerable position. It may have appeared to some witnesses that Mr. Brown was going  
80 to break off the encounter. However, everyone seems to agree that Mr. Brown turned toward  
81 Johnson and then the shots were fired. Some witnesses say that Mr. Brown was once again  
82 advancing on Mr./Ms. Johnson in a menacing manner when the fatal shots were fired. If you  
83 look at the trajectory of the bullet holes in the box of diapers, it would appear the shots were  
84 fired from lower position, in an upward direction. That indicates to me that Mr./Ms. Johnson  
85 was down on the ground and in a vulnerable position when the shooting occurred. From where  
86 Mr./Ms. Johnson was on the ground, he/she would have had a reasonable basis to perceive Mr.  
87 Brown as a genuine threat.

88 I would not place undue emphasis on anything Mr./Ms. Johnson said at the scene. It  
89 is not unusual for people who are in a heightened emotional state – as in a shooting – to speak  
90 and act in an unpredictable and wild manner. That is particularly true, when the shooter is an  
91 inexperienced civilian, as Mr./Ms. Johnson is. After an event like this the shooter may experience  
92 manifestations of physical as well as emotional shock. I have read reports that some shooters  
93 experience an out-of-body sensation. It is far better to look to the physical evidence, when you  
94 are trying to understand what may have happened.

95 Self-defense is easy to understand on one level. A person being threatened fears for his  
96 or her life or safety. No, not every threat requires the application of deadly force, but the decision  
97 to use deadly force is a decision that can be made based solely on the subjective perception of the  
98 person being threatened.

99 Under these circumstances a person could reasonably perceive Aaron Brown as posing a  
100 threat and, if so, then any reasonable person would have a right to protect him/herself.

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*Mickey Norris*

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Mickey Norris

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Aug. 2, 2018

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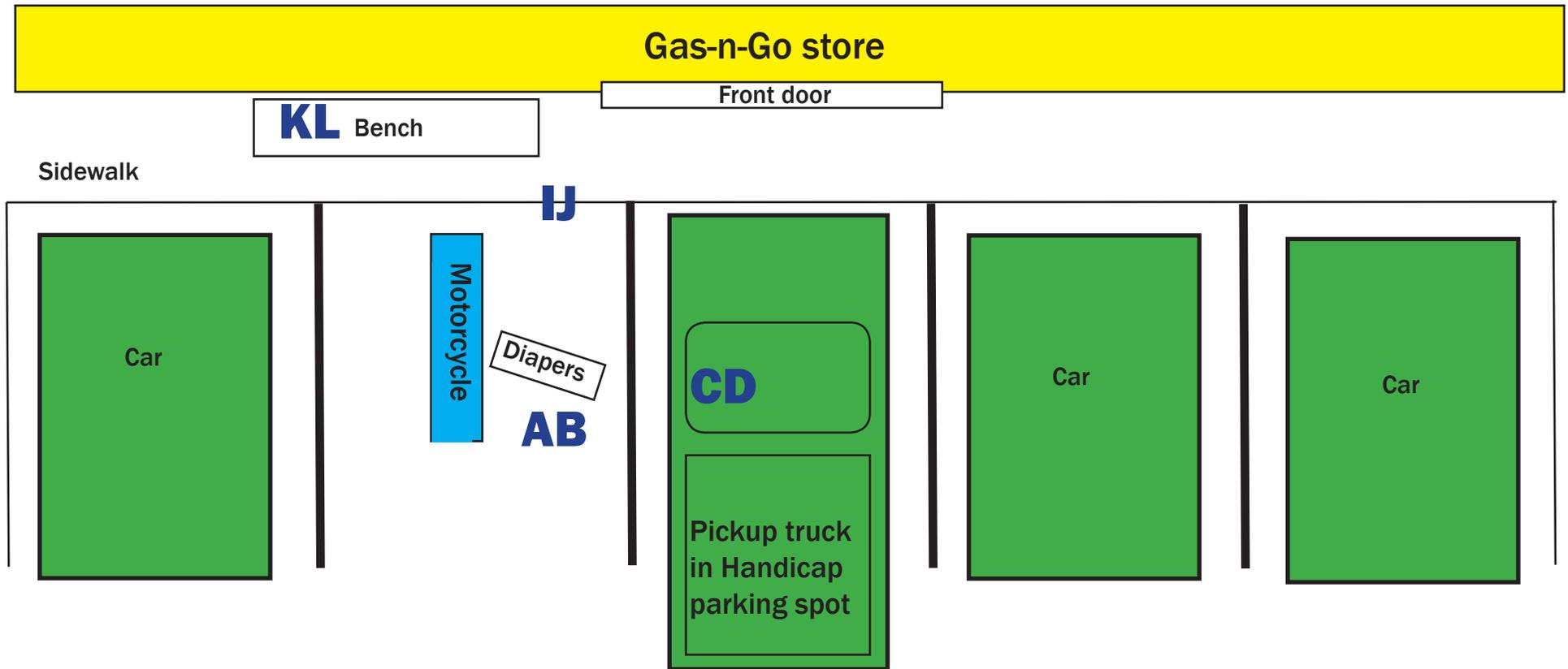


Diagram by Sgt. Hampton of Gas-n-Go parking when he arrived at 4:02 p.m. June 24, 2018.

(Not to scale)

AB - Aaron Brown body

CD - Cameron Drake

IJ - Isa Johnson

KL - Kerry Landon

**CARTER COUNTY MEMORIAL HOSPITAL  
400 Herschler Lane  
Carter City, Wyoming 82999  
307-555-1234**

**POST-MORTEM TOXICOLOGY SCREEN REPORT**

Requesting Agency: Carter City Police Department  
Case #: 2018-2389  
Specimen #: 2747998  
Date of Death: 07/22/2018  
Date of Collection: 07/22/2018  
Investigator: Sgt. Gerry Hampton, CCPD, Badge # 23

Container: 01:RTB Blood, IVC  
Tests Ordered: 75010 Comprehensive Drug Panel

Analyte Name	Result	Concentration	Units
AMPHETAMINES	Neg		
BARBITURATES	Neg		
BENZODIAZEPINES	Neg		
CANNABINOIDS	Neg		
COCAINE/METABOLATES	Neg		
FENTANYL	Neg		
OPIATES	Neg		
OXYCODONE	Neg		
PHENCYCLIDINE	Neg		
PROPOXYPHENE	Neg		
ALCOHOL			
Methanol	Neg		
Ethanol	POS	0.04	g/dL
Isopropanol	Neg		
ANALGESICS	Neg		
STIMULANTS	Neg		

Report:  
Positive finding for alcohol in a concentration below the legal limit for operating a motor vehicle. No other substances detected.

Date: 07/24/2018 Dr. Sam Spade, MD

## Exhibit 3

Diaper box with paths of three bullets from Tokarev 7.62 pistol shown by dowels labeled 1, 2 and 3.

Two views shown.



# Exhibit 4

**GAS – N – GO  
2348 CUSTER AVE  
CARTER CITY, WY 82999  
307-555-9876**

<b>PAMPERS #4</b>	<b>10.56</b>
<b>TAX</b>	<b>0.63</b>
<hr/>	
<b>TOTAL</b>	<b>11.19</b>
<b>TENDERED:</b>	<b>20.00</b>
<b>CHANGE:</b>	<b>8.81</b>
<b>JULY 22,2018</b>	<b>3:53 PM</b>

Try our **Big Buffalo Chili Dog** with our patented **Ghost Pepper Sauce** and wash it down with a cup of **Jack-a-Lope Java Juice**

**You'll be glad you stopped for Gas - N - Go**

## Exhibit 5



**Tokarev 7.62 pistol used in fatal shooting July 22, 2018, of Aaron Brown.**

# Exhibit 6

**Mickey Norris, M.A. Psych.**

**3672 Grant Street**

**Ardmore, PA 19096**

**Tel: 580-555-4567**

**Fax: 580-555-5432**

**Email: Mick.draw357@freepenn.com**

## **Mission:**

I am an ex-police officer with 20 years of on-the-job law enforcement experience. Since retiring I have worked as a consultant and instructor in self-defense, holding numerous workshops and seminars for clients that range from Fortune 500 companies to school districts and individuals. My experience coupled with my academic credentials make me uniquely qualified to discuss how violence affects people and how they can prepare themselves to handle it, when it strikes. I have testified before Congress, state legislatures and city councils. I also provide expert testimony in court with emphasis on the psychology of people involved in shooting incidents.

## **Education:**

Lake Erie University, BA (double major Psychology/Criminal Justice) 1982

Dexter University, M.A. Psych. 1998

Thesis: The Toll of Urban Predations on a Civil Population:  
Are We Living in a Clockwork Orange World?

## **Experience:**

Altoona Police Department, Altoona, PA

- Patrol Officer 1982-1988
- Detective 1988-1992
- Lieutenant 1992-2003

**Self-employed consultant/instructor** 2003 – present

## **Publications:**

Contributor and Part-time Editor of Self-Defense Quarterly, a publication dedicated to the right of people to exercise the right of self-defense