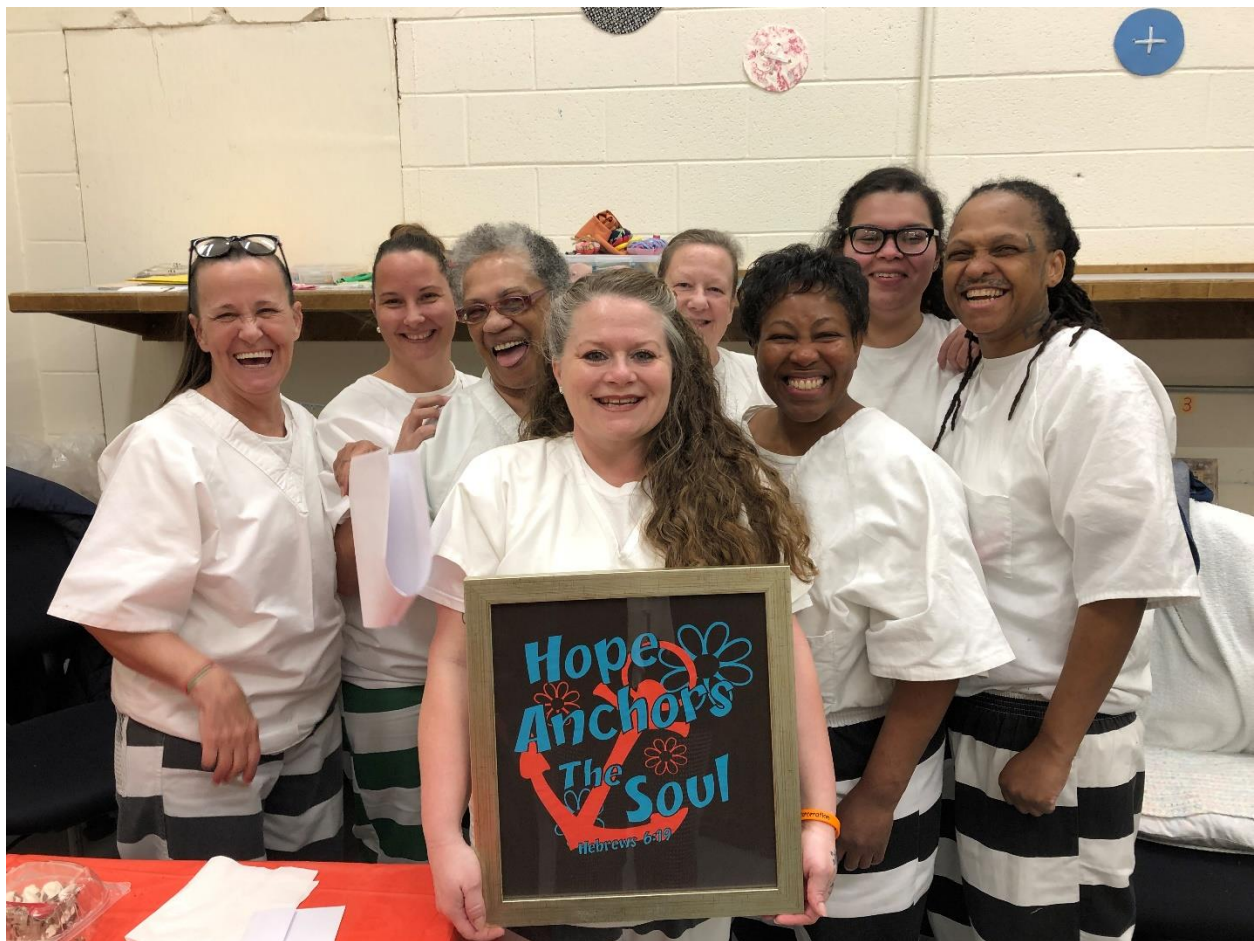

BEFORE GOVERNOR TATE REEVES OF MISSISSIPPI
ON BEHALF OF MISSISSIPPI INMATE TASHA MERCEDEZ SHELBY #K3079

TASHA MERCEDEZ SHELBY'S PETITION FOR CLEMENCY, A PARDON OF HER
LIFE WITHOUT PAROLE SENTENCE, OR A COMMUTATION TO THE PAROLE BOARD
AND A MEMORANDUM IN SUPPORT

Tasha Mercedes Shelby #K3079
CENTRAL MISSISSIPPI CORRECTIONAL FACILITY
PEARL, MISSISSIPPI
SUBMITTED: OCTOBER 3, 2022

IMPRISONED SINCE 2000



Tasha Shelby pictured center with co-volunteers, Central Mississippi Correctional Facility

October 3, 2022

Governor Tate Reeves, State of Mississippi
Office of the Governor
P.O. Box 139
Jackson, MS 39205-0139
Tel: (601) 359-3150

Dear Governor Reeves:

We are filing this Letter and Petition for Clemency, a Pardon of her sentence, or a Commutation to the Parole Board, on international "Wrongful Convictions Day."

Tasha Mercedes Shelby has been imprisoned for 22 years for a crime she did not commit. With no prior history of child abuse against her other children, Tasha was wrongly convicted of capital murder for allegations that she shook her two-year-old stepson to death. Since then, the State's primary witness at trial, Dr. LeRoy Riddick, has determined that his original autopsy and testimony were mistaken. He later testified at Tasha's Post-Conviction Hearing in 2018, admitting this mistake. The only reason Tasha's conviction was not overturned right then and there was because the Court determined it was not "new evidence" that would lead a jury to change their decision. Now, jurors have come forward to share how this evidence would indeed have changed their decision. Tasha would never have been wrongly convicted.

We write to you today to correct a massive wrong that has been committed. We ask you to free an innocent woman. Tasha never had the chance to live her life; she was incarcerated at the age of 22.

If released, Tasha has an opportunity to attend your Alma Matter, Millsaps College, on a full scholarship. As Millsaps Professor Stephanie Rolph says in her support letter, "I champion Tasha Mercedes as someone who I want liberated to do her work in our world today. We need her passion, her experiences, and her genuine commitment to self-improvement and community building." Similarly, Jackson State University Professor Robert Luckett writes, "She has untapped potential, and I have every reason to believe that she will take great advantage of a newfound freedom. I certainly have not seen any sense of a person who is any threat to society at all, quite the opposite."

Tasha has familial support and the support of her congregations. As the letters from the ladies at the First Presbyterian Church in Jackson, volunteers of the Prison Ministry, show, "Tasha Mercedes has a close relationship with Christ and is a person of integrity, and exhibits perseverance in her current situation." (Lisa Lohe, Prison Ministry Volunteer). Another volunteer, Margaret Tohill, shared that "Tasha Mercedes not only knows her Bible, her theology is solid and is exemplified by her behavior toward others, her kindness and sensitivity, her delightful sense of humor, and her high moral and personal standards."

The Governor is authorized by Article 5, Sec. 124 of the Mississippi Constitution to grant pardons and reprieves in all criminal and penal cases, except for treason and impeachment. We urge you to use your authority to grant clemency and a pardon as quickly as to Ms. Tasha Shelby.

Please find a Memorandum of Support of Tasha's clemency, along with relevant news stories, attached letters of support from prison leadership and family, and juror affidavits. Additionally, a news story depicting Tasha Shelby's story will air across Mississippi on October 3, 2022 at <https://www.investigatetv.com/2022/10/03/i-made-mistake-medical-examiner-changes-homicide-finding-convicted-woman-still-behind-bars/>.

Sincerely,

Tasha Mercedes Shelby, Valena Beety, Greg Polins, and Monte Tynes

/s/ Valena Elizabeth Beety
VALENA ELIZABETH BEETY

GREGORY POLINS
Kirkland & Ellis LLP
300 North LaSalle
Chicago, IL 60654
Tel.: (312) 862-2000
Fax: (312) 862-2200
greg.polins@kirkland.com
daniel.gross@kirkland.com

VALENA ELIZABETH BEETY
Professor, Arizona State University College
of Law
111 E. Taylor St.
Phoenix, AZ
valena.beety@asu.edu

DOUGLAS "MONTE" TYNES, JR.
Tynes Law Firm, P.A.
P.O. Drawer 966
525 Krebs Ave.
Pascagoula, MS 39568
Tel.: (228) 769-7736
Fax: (228) 769-8466
monte@tyneslawfirm.com

Counsel for Petitioner Tasha Mercedes Shelby

Table of Contents

I. Introduction.....	6
A. Tasha Shelby is innocent and has more than paid any debt to society.....	6
1. Tasha did not shake or abuse Bryan.....	6
2. Tasha's stepson, Bryan, did not die from shaking or abuse.....	7
3. Jurors from Tasha's trial would not have convicted Tasha.....	8
4. Regardless of Tasha's innocence, her twenty-two years in prison has been sufficient to serve any purposes of punishment.	8
B. Prior to incarceration, Tasha led a normal life.....	9
C. During incarceration, Tasha has demonstrated a commitment to education and personal development.....	9
D. Upon release, Tasha has a network of family, employment, and educational opportunities awaiting her.	12
II. Conclusion	13
III. Attachments.....	14
1. Free Tasha Shelby Website.....	
- https://freetashashelby.com/about-tasha/	
2. Shaken Baby Syndrome: Dodgy Science is sending parents to jail	
- https://www.aljazeera.com/opinions/2022/9/7/shaken-baby-syndrome-dodgy-science-is	
3. Shaken baby syndrome: Mississippi woman, jailed for nearly 20 years, questions science in 2000 conviction.....	
- https://mississippitoday.org/2020/02/04/shaken-baby-syndrome-mississippi-woman-jailed-for-nearly-20-years-questions-science-in-2000-conviction/	
5. Aunt Penny Warner, Letter of Support	
6. Jacob Shelby, Letter of Support.....	
7. 'I made a mistake' - Medical examiner changes homicide finding, but convicted woman still behind bars	
- https://www.investigatetv.com/2022/10/03/i-made-mistake-medical-examiner-changes-homicide-finding-convicted-woman-still-behind-bars/	
8. Bryan Thompson IV Birth Certificate	
9. Doctor's Note	
10. Juror interview – Daniel Mullen	
11. Juror Affidavit – Daniel Mullen	
12. Juror Affidavit – Timothy Cipolla	
13. Tasha Shelby GED Certificate, 1998.....	
14. Certificate for Completed Academic and Vocational Requirements of Central Mississippi Correctional Facility, July 2006.....	
15. Certificate of Completion for Cosmetology course, May 2006	
16. Cosmetologist Certificate of Registration, August 2017	
17. Certificate of Completion of Steck-Vaughn “Read On - Put Reading Mastery Under Your Control” training course March 2011	
18. Certificate of Completion for the Business Technology Program, “Professional Development”, July 2013	
19. Certificate of Completion for the Business Technology Program, “Operating Systems”, August 2013 ..	
20. Certificate of Completion for the Business Technology Program, “Introduction to Keyboarding”, February 2014	
21. Certificate of Appreciation, “Business Technology Tutor” in June 2014.....	
22. Certificate of Microsoft Office Specialist for “Office Word 2010”, November 2014	

23. Certificate of Completion for the Business Technology Program, "Microsoft Word 2010", December 2014
24. Certificate of Completion for the Business Technology Program, "Business English", September 2015
25. Certificate of Completion for completing with distinction the Summer 2016 College course, "Turning Oppression into Opportunity", August 2016.....
26. Certificate of Accomplishment of SmartWork Ethics "Workforce Employability Skills Training Series" on December 2016.....
27. Certificate of Completion for the Business Technology Program, "Business Math", August 2017.....
28. Certificate of Completion for completing the Spring 2017 College course, "American Literature", August 2017
29. Certificate of Completion for completing the Summer 2017 College course, "American History", August 2017
30. Mississippi College Official Academic Transcript, August 2017.....
31. Certificate of Completion for the Business Technology Program, "Microsoft Excel 2010", October 2017
32. Certificate of Completion for the Business Technology Program, "Microsoft PowerPoint 2010", November 2017.....
33. CMCF Chapel Department Fall Play, "I am Clean" Brochure, November 2017.....
34. Sergeant Brown, CMCF Work Evaluation Memorandum of Tasha Shelby
35. Richard Caston, CMCF Recreational Department Director, CMCF Work Evaluation Memorandum of Tasha Shelby
36. Deputy Warden Sheila Parks, CMCF Program Volunteer Evaluation Memorandum of Tasha Shelby ..
37. Christie Scott, CMCF Vocational Director, CMCF Assignments Memorandum of Tasha Shelby
38. Edna Lawrence, CMCF Vocational School Supervisor, CMCF Assignments Memorandum of Tasha Shelby
39. Tanya Berry, Business Program Supervisor, CMCF Vocational School Memorandum of Tasha Shelby
40. Latosha Harper, CMCF Salon Services Supervisor, CMCF Work Evaluation Memorandum of Tasha Shelby
41. Renee' Moore-Smith, Executive Director of The Forget Me Not Project, Letter of Support for Tasha Shelby
42. Astrid Parrett, British Student Attorney, 3DCentre, Letter of Support
43. Emily Girvan-Dutton, British Student Attorney, 3DCentre, Letter of Support
44. Affidavit of Dr. William D. Owen on Mongolian Spots
45. Stephanie Rolph, Professor, History Department, Millsaps College, Letter of Support
46. Robert Luckett, Professor, History Department, Jackson State University, Letter of Support
47. Laura Damon Wofford, Prison Ministry Volunteer, Letter of Support
48. Ruby Harrell Walsh, Prison Ministry Volunteer, First Presbyterian Church Jackson, Letter of Support
49. Margaret S. Tohill, Prison Ministry Volunteer, Letter of Support
50. Lisa Lohe, Prison Ministry Volunteer, Letter of Support
51. Gail B. Jones, Prison Ministry Volunteer, First Presbyterian Church Jackson, Letter of Support
52. Sharon Gatlin, Prison Ministry Volunteer, First Presbyterian Church Jackson, Letter of Support

TASHA SHELBY'S MEMORANDUM IN SUPPORT OF
HER CLEMENCY AND PARDON PETITION

I. Introduction

"One of the strongest parts of that trial to me was his [Dr. Riddick's] testimony. When he changed his mind ... There is no way I could have convicted her if all of this would have been brought out before. No way I could have."

- Daniel Mullen, Juror from Tasha Shelby's trial (Attachment 10, 38:30 – 38:51)

On June 15, 2000, Tasha Mercedes Shelby was convicted of capital murder by child abuse, based on allegations that she shook her stepson to death. However, since her conviction, changes to key medical expert testimony and juror opinions have undermined the very foundation of her conviction. Dr. LeRoy Riddick, the state's key expert witness at trial, reviewed the case and findings by other noted experts, and ultimately came to the conclusion that *he was wrong*. The child did not die from shaking and impact. Tasha Shelby was, and is, innocent.

Dr. Riddick testified at a post-conviction hearing on Tasha's behalf before Judge Clark in Harrison County Circuit Court in Spring 2018. Riddick testified that Bryan's death was not caused by another person, but instead was due to massive cerebral edema caused by a seizure disorder, as well as asthma and blunt force injuries from the fall from the bed. He and other experts also testified that the key factors for a Shaken Baby Syndrome diagnosis were not present (namely, large amounts of bleeding in the brain, and retinal hemorrhages).

The death certificate for Ms. Shelby's stepson was amended from homicide to accident, and the state's key expert against her changed his medical opinion, determining that his original diagnosis of shaking and impact was wrong. Yet Judge Clark upheld the conviction, and Ms. Shelby remains incarcerated, twenty-two years after the tragic accidental death of her stepson.

A. Tasha Shelby is innocent and has more than paid any debt to society.

1. Tasha did not shake or abuse Bryan

In the early morning hours of May 30, 1997, the two-and-a-half-year-old stepson of Tasha Shelby fell from his bed. Shelby found her stepson, Bryan, convulsing on the floor. She attempted to give him CPR and took him to the emergency room at the hospital in Biloxi. Despite the best efforts of Ms. Shelby and the doctors, Bryan did not survive. Tasha, as the only person at home with the child, was charged with capital murder.

Tasha, however, was not physically capable of shaking or abusing Bryan. She had just been in that same hospital – Tasha gave birth via c-section to her daughter Devon and had a tubal ligation surgery there two weeks earlier. Tasha had pre-eclampsia during her pregnancy, and the doctor

recommended bedrest, prescribed her pain relievers, and advised her not to bend over or pick up anything heavy. She had to remain in the hospital for three days following these surgeries. On the day of Bryan's collapse, Tasha's own stitches were newly removed from her body.

Bryan was not a baby. He was two-and-a-half years old, three feet tall, and weighed thirty-three lbs. For comparison, Ms. Shelby is legally a "little person" at 4'9". Tasha was not physically healthy enough at that time to lift Bryan up and shake his head.

Ms. Shelby has no history of child abuse with her other children. This incident was an anomaly, a parent's worst nightmare. From the start, the accusation has been out of character for Tasha Shelby. Even more concerning is that Bryan did not actually die from shaking.

2. Tasha's stepson, Bryan, did not die from shaking or abuse

Bryan did not have the three key identifiers of Shaken Baby Syndrome. He had many underlying health conditions: severe asthma since birth, a home nebulizer, and a seizure disorder. Some of his underlying health conditions were never fully explored because he had an appointment scheduled with a pediatric neurologist for two weeks after his death. Bryan did not have any skull fractures, broken ribs, or injuries to the neck. He suffered a fall from his short bed, and then his father accidentally bumped his head against the car door when rushing him to the hospital. But despite signs to the contrary, Dr. Leroy Riddick, the forensic pathologist who conducted the autopsy of Bryan, determined that Bryan was shaken to death.

Dr. Riddick later changed his opinion and testified on behalf of Tasha Shelby at her state Post-Conviction Hearing in April 2018, before Judge Clark in Gulfport. In 1997, Dr. Riddick concluded that Bryan's death was a homicide—in line with the prevailing wisdom of the time. However, upon re-examination of his records in 2015, Dr. Riddick stated that he would not conclude the same thing today. He testified at the hearing that the death of Bryan was an accident, attributable to the short fall, seizure disorder, and his difficulty breathing. (Hearing Transcript p. 260, ln. 15–18). He testified he did not think Bryan's injuries were intentionally caused by another person. (Hearing Transcript p. 260–261, ln. 23–25, 1). Riddick said he made a mistake in labeling the death as a homicide. He stated unequivocally that now—with the benefit of advancements in medicine and science—he did not believe that Tasha Shelby killed Bryan.

Dr. Riddick's opinion at the hearing was consistent with changes in science since the time of trial and with the child's medical history. (Hearing Transcript p. 260, ln. 19–22). Notably:

- a) The blunt force trauma to which Dr. Riddick had initially attributed the death of Bryan, he testified at the hearing was explained by Bryan's short fall from the bed, and hitting Bryan's head on the car door on the way to the hospital. (Hearing Transcript 261, ln. 7–11, 19–25).
- b) Dr. Riddick reviewed radiologist Dr. Julie Mack's report on the CT Scans and the images themselves, and he was able to correlate the radiology findings with what he saw at Bryan's autopsy: there was no herniation, only a small subdural hematoma, and only trace hemorrhage at the time of Bryan's admission to the hospital. (Hearing Transcript p. 257–258, ln. 25, 1–5) ("As I looked at it and everything, number one, it was a small subdural hematoma. It was not a large one that caused shifting of the hemispheres to one side or

another and causing herniation portions of the brain which would kill immediately. There was no herniation when the CT scans were first done. All it was, was swelling.”).

- c) Reviewing his records, Dr. Riddick testified that he found “the pattern of swelling of the brain had more to do with hypoxia [lack of oxygen] than it did with trauma.” (Hearing Transcript p. 258, ln. 3–5).

Finally, photos were shown to the jury indicating bruising on the child. These influential photos were not actually bruises. They were Mongolian Spots, a skin pigmentation. The child’s father also had Mongolian Spots. Dr. Riddick and another expert, Dr. William D. Owen, both testified that these were not bruises (did not have any blood beneath them) and were indeed birthmarks (Affidavit of Dr. William D. Owen, Attachment 42).

3. *Jurors from Tasha's trial would not have convicted Tasha*

Since this new information came to light, two of the jurors from Tasha's trial said they would not have convicted based on what they now know about the changed science and the change in opinion by Dr. Riddick. Daniel Mullen, one of the jurors, in particular said:

“The evidence that was presented to us at the time, it showed that she was guilty. But if this evidence would have been presented to the jury or to the court, I don't think any of the jurors would have found her guilty. I know I would not have.”
– Daniel Mullen.

The other juror, in a signed affidavit, also highlighted the innate pressure during Tasha's trial:

"[During lunch] The judge would sit near us with the prosecutors and bailiffs. The judge would acknowledge us. He was always at the same place as us during lunch break."
– Timothy Cipolla (Attachment 11).

Without access to all of the information pertinent to Tasha's case, as well as social pressure from the judge and prosecutors, the jurors were not in a position to accurately evaluate all the facts. As stated by Daniel Mullen, "If I had known that baby was having seizures, there is no way I would have convicted... that would have been a reasonable enough doubt for me." (Attachment 11, 52:23 – 52:43).

4. *Regardless of Tasha's innocence, her twenty-two years in prison has been sufficient to serve any purposes of punishment.*

Tasha Shelby has now spent more years of her life in prison than out of prison. She was convicted when she was 22 years old. Now, Ms. Shelby is 47 years-old and only hopes to live the rest of her life. Ms. Shelby is not a danger to society. She had no history of child abuse allegations or conduct against any of her other children. She has no other history of violence, drug use, or any criminality that would make her unfit to reenter society. This is her one and only interaction with law enforcement; she does not even have a prior arrest. Her twenty-two years behind bars proved that Mississippi is not soft on crime, and that there must be respect for the law to maintain order.

As mentioned previously, Ms. Shelby is also legally a little person at 4'9. She is not the type of person that society needs to be protected from. Additionally, as mentioned in the following sections, Ms. Shelby has made tremendous strides toward bettering herself while incarcerated. With **only one write-up since 1998**, Ms. Shelby has been a model inmate and has taken every single opportunity to prove her dedication toward leading a better life. She has the support from guards and multiple leaders at CMCF who volunteered to write memorandums of support. Tasha Shelby is ready to rejoin society.

B. Prior to incarceration, Tasha led a normal life.

Tasha led a normal life as a stay-at-home mom before Bryan's death. She lived with her fiancée, Bryan Thompson III, her son Dakota, and Bryan's son Bryan Thompson IV, in Biloxi, Mississippi. They had a home together, and Big Bryan worked at Lumber 9. Two weeks before Little Bryan's death, Tasha gave birth to their daughter Devon, and their family was complete. Tasha had never been arrested for any offense, let alone convicted. Soon after Little Bryan's death, Tasha and Big Bryan married, hoping to face the grief of losing a child, and the challenges of getting their other children back, together. This prosecution disrupted any chance of their family continuing on together, raising Dakota and Devon, and supporting each other through the grief. Instead, Tasha was arrested, and detained for nearly three years before ultimately tried and convicted.

C. During incarceration, Tasha has demonstrated a commitment to education and personal development.

"Tasha is extremely intelligent. She's done everything she can to take advantage of programs within the prison system. She was offered a full scholarship to Millsaps, so that speaks of her abilities."

- Renee Moore-Smith, Executive Director of The Forget Me Not Project (Attachment 40).

Tasha's entire incarceration has been dedicated to her being prepared for life after prison. Despite being incarcerated for a crime she did not commit, Tasha understood the importance of improving herself through education and vocational training so that if she were released, she would be able to seamlessly rejoin society. Since her incarceration, Tasha has:

- Passed her GED, 1998
- Received a Certificate for Completed Academic and Vocational Requirements of Central Mississippi Correctional Facility, July 2006
- Completed course in Cosmetology in May 2006
 - Received a Cosmetologist Certificate of Registration, August 2017
- Received a Certificate of Completion of Steck-Vaughn "Read On - Put Reading Mastery Under Your Control" training course March 2011
- Received a Certificate of Completion for the Business Technology Program, "Professional Development", July 2013
- Received a Certificate of Completion for the Business Technology Program, "Operating Systems", August 2013

- Received a Certificate of Completion for the Business Technology Program, “Introduction to Keyboarding”, February 2014
- Received a Certificate of Appreciation, “Business Technology Tutor” in June 2014
- Received a Certificate of Microsoft Office Specialist for “Office Word 2010”, November 2014
- Received a Certificate of Completion for the Business Technology Program, “Microsoft Word 2010”, December 2014
- Received a Certificate of Completion for the Business Technology Program, “Business English”, September 2015
- Received a Certificate of Completion for completing with distinction the Summer 2016 College course, “Turning Oppression into Opportunity”, offered by the Prison-to-College Pipeline Program through the Mississippi College and sponsored by the Mississippi Humanities Council, August 2016.
- Received a Certificate of accomplishment of SmartWork Ethics “Workforce Employability Skills Training Series” on December 2016
- Received a Certificate of Completion for the Business Technology Program, “Business Math”, August 2017
- Received a Certificate of Completion for completing the Spring 2017 College course, “American Literature”, offered by the Prison-to-College Pipeline Program through the Mississippi College, August 2017
- Received a Certificate of Completion for completing the Summer 2017 College course, “American History”, offered by the Prison-to-College Pipeline Program through the Mississippi College, August 2017
- As of August 2017, Tasha has maintained a 4.0 GPA in her undergraduate studies at the Mississippi College, A Christian University
- Received a Certificate of Completion for the Business Technology Program, “Microsoft Excel 2010”, October 2017
- Received a Certificate of Completion for the Business Technology Program, “Microsoft PowerPoint 2010”, November 2017
- Participated in the CMCF Chapel Department performance of “I am Clean”, Fall play as the Director’s assistant and Narrator, November 2017

In her almost twenty-two years of incarceration at CMCF, **she has only been written up once.** Her conduct, school, and work performance has been stellar. Multiple supervisors, program directors and even the Women's Deputy Warden have all written memorandums detailing her stellar performance.

Tasha’s direct supervisor, Sergeant Brown stated, "Offender Shelby consistently worked hard and willingly worked in this trusted assignment. Shelby’s contribution was instrumental and greatly appreciated. Records also indicated Offender Shelby did not miss one day of work during this time." (Attachment 33). In the decades spent working and in school, she has not missed a single day of work, and has no unexcused absences for any of her school and vocational studies.

In 2017, Tasha received her Cosmetology registration certificate. As a student, Tasha has been ambitious. In all six of the Business Technology programs (Professional Development, Operating Systems, Introduction to Keyboarding, Microsoft Word 2010, Microsoft Excel 2010,

Microsoft PowerPoint 2010), Business English, and Applied Business Math, Tasha received A+. She also earned an official Microsoft distinction of "Microsoft Office Specialist" for her work with Office Word 2010. She also completed four undergraduate courses through Mississippi College, a Christian University "Prison-to-College Pipeline Program". She maintained a 4.0 GPA, straight A's.

Tasha through her own experiences learned the importance of mentorship and has strived to be a role model for other incarcerated women. Over a period of 14 years, she was an art class tutor, Life Skills tutor, Business 1&2 tutor, and ABE 3 tutor. Christie Scott, the CMCF Vocational Director, stated "Vocational records indicate that Shelby's school/work responsibilities and dedication to the Vocational School for the past 14 years has been exceptional. Shelby has no unexcused absences during this time." (Attachment 36).

Tasha also completed the "Read on Training" Program and Smart Work Ethics program and implemented those skills in being a mentor for other women going through rehabilitation. She volunteered in a book program where she helped incarcerated women record themselves reading books to send to their children. For her involvement in this program, Deputy Warden Sheila Parks stated, "Offender Shelby consistently worked hard and willingly volunteered in this trusted assignment." (Attachment 35). Tasha also participated in a program aimed at deterring at-risk youth from a life of criminality. She would give tours of the prison and show children what their life could look like if they did not take steps to turn their lives around.

Officer Tori Morgan writes of Tasha, that "she has been a model inmate and has not caused any problems since she has been incarcerated her at MS Department of Corrections, and has shown no signs of being disrespectful toward staff or inmates."

Tasha has taken advantage of every opportunity while incarcerated to improve herself. She has displayed tenacity, an admirable work ethic, and a commitment to reentering society as a positive member. In particular, Renee' Moore-Smith, the Executive Director of "The Forget Me Not Project" has maintained the highest regard for Tasha. A Flowood, Mississippi community member herself, Ms. Moore-Smith spent several months working with Tasha.

"If you ever have the opportunity to meet Tasha, you'll see what everyone else sees. There is an innocence and sweetness about her and she glows. Most who are serving Life without Parole...their light is dim...but not Tasha. She's expecting to be released. I remember the day I asked her how much time she had left on her sentence. When she told me she was serving Life without Parole I'm sure the look on my face was nothing but shock. I simply couldn't believe it. At that point, I didn't know what to say, and she was reluctant to say anything. Rules." (Attachment 40)

Ms. Moore-Smith looked into Tasha's case on her own. "I began doing my own research. I learned that Tasha had been represented by The Innocence Project at that time for about 10 years. The more I studied and unpacked her case, the more shocked I became. Petition after petition had been denied. Even as new evidence came to light, our justice system denied her the right to a new trial." (Attachment 40).

People incarcerated with Tasha, including youth, also admire and respect her. Crystal Marshall, an 18-year-old woman incarcerated at CMCF, says “Tasha is a role model for a lot of people, but for me she’s my big sister I never had.” Inmate Tiffany Menifield writes, “Her life influenced mine in many ways: her consistency and drive to be positive, improve her situation in spite of, her walk with God and remaining faithful still incarcerated.”

In terms of Tasha’s skills, inmate Anita Krecic writes, “Tasha Mercedes has developed into an amazing woman who has showcased her artistic skills through impressive artwork and her talents as a professional cosmetologist, a license which she studied hard to receive in prison...She always encourages others and freely shares her talents with all. Tasha Mercedes has been a phenomenal friend to me and a wonderful sister in the Lord.”

Inmate Tiffini Martin speaks to seeing Tasha with her own children, writing, “My daughter has been to visit me every visitation day and each time she looks for Tasha Mercedes. I have personally witnessed through visitation and special events, at the prison, that children are drawn to Mercedes and vice versa.”

Tasha Shelby has made great strides to pursue volunteer, employment, and educational opportunities while in prison. All of this, in hopes that she could one day put these skills to use when she is finally free.

D. Upon release, Tasha has a network of family, employment, and educational opportunities awaiting her.

Tasha has people who love and miss her and are ready to support her the second she is released from prison. As detailed in the attached letters of support, Ms. Shelby has the support of her Aunt Penny Warner, her brother Jacob Shelby, and her Aunt Linda Brockman. Penny has already offered for Tasha to live with her and her husband Jim upon release. Tasha would have her own bedroom and private full bathroom in a downstairs suite. Penny and her husband's house is 5,000 square feet on eleven acres in Primm Springs, just 30 miles south of Nashville, Tennessee. The family has six mini donkeys, nine ducks, two geese, one barn cat, and three dogs. The family belongs to the Columbia First United Methodist Church in Columbia, TN. The congregation is already extremely supportive of Tasha, and she would have a community of support. Tasha has an entire family and community awaiting her return.

Tasha would have ample opportunity to obtain gainful employment. Multiple members of her family own businesses, and others are in managerial positions, and would immediately be able to offer Tasha employment. The metropolitan Nashville area has tremendous job opportunities and is one of the fastest growing areas in the country.

Tasha is determined to continue her college education and earn at least a bachelor's degree. This goal is more than achievable. If released, Tasha already has an opportunity lined up to attend Millsaps College on a full scholarship. (Attachment 42). Tasha has a passion for history and one day hopes to become a teacher or professor. She also hopes to become an advocate for other people

in the criminal legal system who have faced the same plight as her. She wants to learn Spanish and learn to play an instrument, things she hasn't been able to do during her years of incarceration.

Tasha now has two adult children. Her son Dakota is now 27 years old. Her daughter Devon is now 25 years old. Tasha only had 15 days with her daughter before her daughter was taken in the aftermath of Little Bryan's death. Tasha is now a grandmother, who has yet to meet her grandchildren. Tasha has had minimal contact with both her children because of her incarceration. She wishes more than anything to reunite with her children and attempt to salvage her relationship with them, and meet her grandchildren.

II. Conclusion

"I can testify that she has been a faithful and devoted student of the Bible. She has shown compassion and humility to her fellow prison inmates and has shown the love of Christ to all those she comes in contact with. She has shown exemplary character and has been a Godly example to others."

- Ruby Harrell Walsh, Prison Ministry Volunteer, First Presbyterian Church of Jackson

Tasha Mercedes Shelby, an innocent woman, has been in prison for more than two decades. Due to changes in science and the newly available evidence, at least two jurors in her case have already said they would not have found her guilty. Indeed, two young attorneys from **Great Britain** came to Mississippi for the Summer of 2022 to investigate Tasha's case and support her – Emily Girvan-Dutton and Astrid Parrett. Dr. Riddick's mistake caused Ms. Shelby to miss the better part of her young adult life, as well as the entire childhood of her two children.

Despite this, **Tasha has dedicated the last twenty-two years to self-improvement.** She has received numerous educational certificates, vocational certificates, and has glowing recommendations from prison staff and leadership, as well as members of the Prison Ministry. Tasha Shelby is not the individual that society needs to be protected from, nor does she deserve the punishment she received. Ms. Shelby respectfully asks that you grant her full clemency and call for her immediate release.

III. Attachments

1. Free Tasha Shelby Website
 - <https://freetashashelby.com/about-tasha/>
2. Shaken Baby Syndrome: Dodgy Science is sending parents to jail
 - <https://www.aljazeera.com/opinions/2022/9/7/shaken-baby-syndrome-dodgy-science-is>
3. Shaken baby syndrome: Mississippi woman, jailed for nearly 20 years, questions science in 2000 conviction
 - <https://mississippitoday.org/2020/02/04/shaken-baby-syndrome-mississippi-woman-jailed-for-nearly-20-years-questions-science-in-2000-conviction/>
4. Aunt Penny Warner, Letter of Support
5. Jacob Shelby, Letter of Support
6. 'I made a mistake' - Medical examiner changes homicide finding, but convicted woman still behind bars
 - <https://www.investigatetv.com/2022/10/03/i-made-mistake-medical-examiner-changes-homicide-finding-convicted-woman-still-behind-bars/>
7. Tasha Shelby Birth Certificate
8. Doctor's Note
9. Juror interview – Daniel Mullen
10. Juror Affidavit – Daniel Mullen
11. Juror Affidavit – Timothy Cipolla
12. Tasha Shelby GED Certificate, 1998
13. Certificate for Completed Academic and Vocational Requirements of Central Mississippi Correctional Facility, July 2006
14. Certificate of Completion for Cosmetology course, May 2006
15. Cosmetologist Certificate of Registration, August 2017
16. Certificate of Completion of Steck-Vaughn “Read On - Put Reading Mastery Under Your Control” training course March 2011
17. Certificate of Completion for the Business Technology Program, “Professional Development”, July 2013
18. Certificate of Completion for the Business Technology Program, “Operating Systems”, August 2013
19. Certificate of Completion for the Business Technology Program, “Introduction to Keyboarding”, February 2014
20. Certificate of Appreciation, “Business Technology Tutor” in June 2014
21. Certificate of Microsoft Office Specialist for “Office Word 2010”, November 2014
22. Certificate of Completion for the Business Technology Program, “Microsoft Word 2010”, December 2014
23. Certificate of Completion for the Business Technology Program, “Business English”, September 2015

24. Certificate of Completion for completing with distinction the Summer 2016 College course, "Turning Oppression into Opportunity", August 2016.
25. Certificate of Accomplishment of SmartWork Ethics "Workforce Employability Skills Training Series" on December 2016
26. Certificate of Completion for the Business Technology Program, "Business Math", August 2017
27. Certificate of Completion for completing the Spring 2017 College course, "American Literature", August 2017
28. Certificate of Completion for completing the Summer 2017 College course, "American History", August 2017
29. Mississippi College Official Academic Transcript, August 2017
30. Certificate of Completion for the Business Technology Program, "Microsoft Excel 2010", October 2017
31. Certificate of Completion for the Business Technology Program, "Microsoft PowerPoint 2010", November 2017
32. CMCF Chapel Department Fall Play, "I am Clean" Brochure, November 2017
33. Sergeant Brown, CMCF Work Evaluation Memorandum of Tasha Shelby
34. Richard Caston, CMCF Recreational Department Director, CMCF Work Evaluation Memorandum of Tasha Shelby
35. Deputy Warden Sheila Parks, CMCF Program Volunteer Evaluation Memorandum of Tasha Shelby
36. Christie Scott, CMCF Vocational Director, CMCF Assignments Memorandum of Tasha Shelby
37. Edna Lawrence, CMCF Vocational School Supervisor, CMCF Assignments Memorandum of Tasha Shelby
38. Tanya Berry, Business Program Supervisor, CMCF Vocational School Memorandum of Tasha Shelby
39. Latosha Harper, CMCF Salon Services Supervisor, CMCF Work Evaluation Memorandum of Tasha Shelby
40. Renee' Moore-Smith, Executive Director of The Forget Me Not Project, Letter of Support for Tasha Shelby
41. Astrid Parrett, British Student Attorney, 3DCentre, Letter of Support
43. Emily Girvan-Dutton, British Student Attorney, 3DCentre, Letter of Support
44. Affidavit of Dr. William D. Owen on Mongolian Spots
45. Stephanie Rolph, Professor, History Department, Millsaps College, Letter of Support
46. Robert Luckett, Professor, History Department, Jackson State University, Letter of Support
47. Laura Damon Wofford, Prison Ministry Volunteer, Letter of Support
48. Ruby Harrell Walsh, Prison Ministry Volunteer, First Presbyterian Church Jackson, Letter of Support
49. Margaret S. Tohill, Prison Ministry Volunteer, Letter of Support
50. Lisa Lohe, Prison Ministry Volunteer, Letter of Support
51. Gail B. Jones, Prison Ministry Volunteer, First Presbyterian Church Jackson,

Letter of Support

52. Sharon Gatlin, Prison Ministry Volunteer, First Presbyterian Church Jackson,
Letter of Support