

PETITION FOR EXECUTIVE CLEMENCY

Pennsylvania is preparing to execute Terrance "Terry" Williams for the 1986 capital murder of Amos Norwood. At the time of the killing, Terry was only three and a half months past his eighteenth birthday, the minimum age for the imposition of the death penalty. On that tragic day, Terry and another 18-year-old, Marc Draper, beat Mr. Norwood to death in a cemetery in the Mt. Airy neighborhood of Philadelphia.

At trial, the jury was informed that Terry had prior convictions for a 1982 armed robbery and the 1984 killing of Herbert Hamilton, which Terry committed at ages 16 and 17, respectively. The jury never learned, however, that both Herbert Hamilton and Amos Norwood had sexually abused Terry, or that both killings directly related to Terry's history of sexual abuse by these and other older males, which began when Terry was only six years old. In fact, jurors heard very little about Terry's childhood, which was marked not only by over a decade of sexual abuse, but by years of physical and emotional abuse, neglect and abandonment by those who were supposed to love and care for him. The unrelenting abuse and neglect made Terry an easy target for sexual predators.

Day after day, while living in constant terror, Terry showed up at school, went to class, went to football practice, and socialized with other children while trying to hide the sexual abuse that he suffered and the constant beatings at the hands of his mother and step-father. All the while Terry longed for an adult to love and protect him but believed that the proof of his own worthlessness was the fact that no one ever did.

Mr. Norwood's widow, Mamie Norwood, has forgiven Terry. She does not want Terry to be executed for her husband's killing. Mrs. Norwood wants the peace and closure of resolving her husband's case without any further loss of life. She prays that this Board and Governor Corbett will

commute Terry's sentence to life without the possibility of parole.

Five of the jurors from Terry's capital trial agree that Terry's life should be spared. In recent sworn statements, they have explained that if they had known the truth about Terry's childhood, the fact that he was exploited and sexually assaulted by the men he killed, as well as the fact that a life sentence meant life without parole, they never would have sentenced Terry to death.

Terry is deeply remorseful for killing Herbert Hamilton and Amos Norwood. From behind the prison walls, he has developed a strong relationship with God and he strives to provide loving support and friendship to others.

There are no excuses or justifications for what Terry did. The abuse he suffered and its effects on Terry's psyche simply provide insight into the traumatized and impaired thinking that led him to commit these crimes.

Clemency is an act of grace; it tempers justice with mercy. Under similar conditions, five capital inmates facing imminent execution in Delaware, Ohio, Oklahoma, and Tennessee were granted clemency over the past three years. In light of the wishes of Mr. Norwood's widow, the pleas of the jurors, and the reasons set forth herein, we respectfully urge the members of the Board of Pardons and Governor Corbett to exercise mercy and grant Terry's request for executive clemency.

Clemency Is Warranted In This Unique Case

I. Terry Williams was severely and repeatedly traumatized, abused, and neglected as a child and adolescent.

As Pennsylvanians are now well aware, sexual abuse often goes unreported for years, sometimes decades. Sadly, some abuse victims never become able to admit that they were sexually

abused and remain silent forever. Recently, many of Pennsylvania's most prominent public figures and leaders have acknowledged that it is extremely difficult for victims of sexual abuse to come forward and publicly acknowledge their abuse. This is particularly true with child victims.

Governor Tom Corbett has said that to get young men who have been sexually abused to come forward "is not the easiest thing in the world to do."¹ Philadelphia District Attorney Seth Williams echoed the Governor's sentiments: "As we have learned over the years, it is extremely difficult for sexual abuse victims to admit that the assault happened, and then to actually report the abuse to authorities can be even harder for them."² Attorney General Linda Kelly agreed, saying, "It was incredibly difficult for some of them to unearth long buried memories of the shocking abuse that they suffered."³

Unfortunately, the sexual abuse that was perpetrated on Terry occurred in the 1970s and 1980s, an era when there was little awareness or support for children who were subjected to sex crimes. Like so many victims of sexual abuse, Terry was a child who was too scared and ashamed to come forward about his abuse. As part of a long process of healing, and as our society began to encourage victims of sexual abuse to come forward, Terry has finally been able to acknowledge and discuss the awful details of his childhood sexual abuse. It was not until decades after the abuse when Terry met at length with Dr. David Lisak, an expert in male sex abuse and co-founding member of "1in6", that Terry was able to disclose many compelling and critical details of his abuse.⁴ Terry asks that this Board and Governor Corbett carefully consider his compelling social history and the true facts of the crimes – an opportunity his jury never had.

A. Terry Williams' home life was fraught with abuse and neglect.

Terry Williams' childhood of abuse, neglect, and deprivation made him an easy mark for sexual predators. His mother, Pat Kemp, would beat him mercilessly for any minor infraction. At home, she beat him with belts, fists, extension cords, switches, or anything that she could get her hands on.⁵ Terry's siblings were subject to similar treatment. Terry's half-sister, Theresa, described one incident:

One time my mother poured hot boiling water on me when I was a toddler. I remember being in the hospital after my mother burnt me. The nurses would put white towels on the floor and try to help me walk. I would look behind me and see my own bloody footprints on the towels. For a long time after I got out of the hospital, layers of skin would peel off of my feet when my mother bathed me.⁶

Pat also beat Terry at school. Terry's classmates and teachers recall an incident during elementary school when Pat followed Terry down a flight of steps "wailing on him as hard as she could. . . . She was beating him in the head and back as he tried to get away from her . . . He had his arms over his head trying to protect himself and begging her to stop. I think the most horrifying part of this was the trail of blood flowing from Terry."⁷

The abuse intensified when Terry was ten years old and his mother married Ernest Kemp, a violent alcoholic. Terry's older siblings, Thomas and Theresa, fled the home to escape Ernest's violence, leaving Terry alone with Pat and Ernest. Terry would hide in his room with the door locked, but Ernest would smash through Terry's door and repeatedly beat young Terry.⁸

As a child, Terry had no one to support or protect him. When he was six years old, he was sexually assaulted by an older boy in his neighborhood.⁹ He came home in tears, bleeding from his rectum. Terry reported the assault to his mother, who saw the blood on his backside but never even

sought medical attention for her son, let alone counseling or mental health treatment.¹⁰ As is often the case in instances of childhood sexual abuse, Terry was ashamed and suffered largely in silence. Not one person intervened to protect Terry from his multiple abusers.

B. Terry was sexually abused as a child.

Sexual abuse “is a crime that thrives in the darkness – fed by fear and threats, shame and secrecy – while predators carefully seek the most vulnerable prey while often cloaking themselves in a respectability, almost beyond reproach.” Pennsylvania Attorney General Linda Kelly.¹¹ Terry Williams was one of those children most vulnerable to sexual abuse. His need for protection and affection made him a prime target for sexual predators.

Terry was first sexually abused when he was only six years old by an older boy, his neighbor, Peter Robinson. Robinson befriended young Terry and, after gaining his trust, Robinson raped Terry twice.¹² The rapes left Terry frightened and confused. Terry came to believe that he was responsible for the rapes and that his self worth was somehow tied to his value as a sexual object.

Other sexual predators recognized Terry’s vulnerability. Timothy Johnson, a teacher at Terry’s middle school, was one of those sexual predators. Mr. Johnson groomed Terry so that he could abuse him.¹³ Lucille Rogers, Terry’s neighbor and the mother of his high school girlfriend, recalls that Mr. Johnson was constantly spending money on Terry.¹⁴ Mr. Johnson bought Terry clothes, sneakers, bikes, and anything else that he thought Terry might want.¹⁵

Eventually, Terry trusted Mr. Johnson, and Mr. Johnson took advantage of that trust. Mr. Johnson brought Terry to his home where he ordered him to undress.¹⁶ Terry believed that he owed Mr. Johnson for all of the gifts and affection that he had received so he complied with his teacher’s orders. Mr. Johnson then raped Terry.¹⁷ Mr. Johnson told Terry that he loved him and that he would

continue to buy him whatever he needed. Thus began a pattern of sexual assaults by Mr. Johnson. Lucille Rogers suspected that Terry was being abused by Mr. Johnson and saw that he was traumatized and ashamed of that experience.¹⁸

Terry suffered tremendously from the Johnson rapes. He spiraled into an even deeper level of confusion and despair. No one intervened or offered Terry help, and so he turned to alcohol, drugs, and self mutilation as a means of coping with the trauma.

At age sixteen, Terry was ordered to a juvenile detention center as a result of his involvement in a juvenile burglary. There, he was gang raped by two older males.¹⁹ Terry had now suffered sexual abuse that spanned over a decade. He lived his life in fear. As he told Dr. Lisak, "I always felt that just around the corner someone might be coming."²⁰

C. Herbert Hamilton and Amos Norwood both sexually abused Terry when he was a child.

Herbert Hamilton and Amos Norwood—both of whom Terry eventually killed—were middle aged sexual predators who preyed on teenage boys.²¹ Just like Mr. Johnson did, Mr. Hamilton and Mr. Norwood provided teenagers with money, clothes, and food in exchange for sex. Terry was one of those teenagers.

It can be difficult to understand why someone like Terry, who was repeatedly raped as a child, would find himself later engaged in sexual acts with older men. Dr. Lisak explains that Terry was introduced into the sex trade as a young child, long before he could have understood that he was being manipulated or exploited.²² The years of exploitation and abuse made Terry believe that his value as a person hinged on his value as a sexual object. In fact, the abuse that Terry suffered as a child systematically shaped all of his actions and made him particularly vulnerable to child predators,

including Mr. Hamilton and Mr. Norwood.²³

1. Herbert Hamilton

Herbert Hamilton was six foot four inches tall and ran a prescription drug dealing scheme.²⁴ Mr. Hamilton and his older male friends had an interest in having sex with boys and watching boys have sex.²⁵ [REDACTED] was one of Hamilton's teenage victims.²⁶ He describes his relationship with Mr. Hamilton:

I met Hamilton . . . when I was sixteen years old. Herb was in his mid forties . . . I was in eleventh grade at West Philly High when I moved in with Herb . . . There was no mistaking that I was under his control . . . Herb once forced himself on one of my friends. Herb told the boy "you gonna give me some."²⁷

[REDACTED] recalls other incidents where Mr. Hamilton used his money and power to have sex with his teenage friends.²⁸ Terry was one of those teens. Just as Terry's school teacher did years before, Mr. Hamilton began courting Terry by offering kindness, rides to school, and gifts.²⁹ As their relationship progressed, Mr. Hamilton took Terry to his house. There, Mr. Hamilton instructed Terry to relax and have a drink. Mr. Hamilton then ordered Terry to his bedroom where he showed Terry numerous photographs of nude boys. He directed Terry to pose nude, but Terry refused. Mr. Hamilton then left the room and came back nude. He told Terry, "you won't leave until you pose."³⁰

A chaotic fight ensued in which Mr. Hamilton stabbed 17-year-old Terry and Terry stabbed him back. As the fight continued, Terry was thrown into a kerosene heater and burned his back. Terry then grabbed a bat and struck Mr. Hamilton. When Mr. Hamilton fell to the floor, Terry stabbed him repeatedly. Dr. Lisak explains that the "frantic, desperate nature of the fight and the number of stab wounds inflicted on Hamilton, are consistent with the rage that Terry was

increasingly feeling towards all of the men who had exploited, abused, and raped him over the course of his life.”³¹

2. Amos Norwood

Amos Norwood, the decedent in Terry’s capital case, was the director of the Youth Theater Fellowship and the leader of the acolytes (altar boys) at St. Luke’s Episcopal Church in Philadelphia. He was also a sexual predator. Reverend Charles Poindexter, the pastor at St. Luke’s Church at the time of Mr. Norwood’s involvement, and others at the church observed that Mr. Norwood was engaged in close relationships with a lot of boys.³² They suspected that these relationships were inappropriate.³³ Their suspicions were confirmed when the mother of a 15-year-old acolyte told Reverend Poindexter that Mr. Norwood, while driving her son to a church event, touched his genitals.³⁴ The boy’s mother also told Reverend Poindexter that Mr. Norwood inappropriately touched a number of boys at the church.³⁵

██████████ was a member of St. Luke’s Church as a child and was one of the boys that Mr. Norwood attempted to sexually assault.³⁶ ██████████ explains that as a child he considered Mr. Norwood an uncle.³⁷ Mr. Norwood, however, had other ideas. When ██████████ was approximately sixteen years old, Mr. Norwood approached him and propositioned him for sex. ██████████ recalls that Mr. Norwood said something like “I won’t hurt you and you won’t hurt me.”³⁸ ██████████ was only one of the many children whom Mr. Norwood attempted to abuse. ██████████ remembers one of his friends from the church telling him that he too had been propositioned for sex by Mr. Norwood.³⁹ No adult at the church took any action to protect the boys.

Terry was another of Mr. Norwood’s young victims.⁴⁰ Terry was in his early teenage years when he met Mr. Norwood.⁴¹ What Terry believed to be a friendship quickly evolved into sexual

exploitation. During one of their initial encounters, Mr. Norwood offered Terry two hundred dollars for sex.⁴² Because of his history of abuse, Terry accepted. At their next meeting, Mr. Norwood again paid Terry for sex.⁴³ This time, however, Mr. Norwood took out a whip and beat Terry on his legs.⁴⁴ Terry pleaded with Mr. Norwood to stop.⁴⁵

As Mr. Norwood continued to sexually exploit Terry, the violence escalated. Mr. Norwood pinned Terry down, hit him in the face with his belt, and bit his ears. When the encounters were especially violent, Mr. Norwood gave Terry extra money.⁴⁶ As the beatings worsened, any belief that Terry had that Mr. Norwood cared about him faded away and was replaced with an intensifying rage at Mr. Norwood, Mr. Hamilton, Mr. Johnson, Peter Robinson, and all the men who had raped, assaulted, and exploited him.

On June 10, 1984, the day before Terry killed Mr. Norwood, Mr. Norwood violently assaulted Terry. Mr. Norwood drove Terry to an unlit parking lot that was surrounded by woods. Terry described what happened next to Dr. Lisak:

He made me lean against his car and he penetrated me from behind . . . he was rough . . . I felt hurt and mad because he was rough with me that night. He forced himself into me. I told him to stop. He kept on. I was clenching my anus so tight trying to stop him but he wouldn't stop and it hurt so bad I screamed.⁴⁷

When Terry got home that night, he saw blood stains on his underwear. The next day, he was still in pain.

On the night of the killing, Terry's anger had been intensifying for months. Terry described his emotions to Dr. Lisak: "I was very angry and very scared, and I just snapped. I wanted him to feel the pain that he made me feel. I couldn't think clearly. I felt such anger and betrayal at everyone who used me and betrayed me. I couldn't think of anything else."⁴⁸

II. Terry's violent acts against Hamilton and Norwood when he was seventeen and eighteen years old, respectively, were directly related to the sexual and physical abuse that he endured throughout his childhood.

Terry's childhood had a devastating effect on his psychological and emotional development. Terry's first eighteen years of life were nothing short of tragic. He was physically abused by his mother and stepfather and was raped and sexually assaulted repeatedly by adults who should have protected him. He never received any kind of mental health treatment or counseling to help him cope with the trauma.

One by one, each of Terry's abusers left him more confused, more angry and more scared. The physical and emotional abuse inflicted at home severely damaged Terry's sense of self worth. Terry sought the attention of someone who could play the role of the loving parent he never had. His yearning for affection, care, and protection made him an easy target for sexual predators.

Sexual predators used their age, power, and money to lure Terry into a false sense of security. Then they used his body for sex. Terry's first abuser, Peter Robinson, left six-year-old Terry profoundly confused and scarred.⁴⁹ He felt intense shame. Later, the rapes by his former schoolteacher threw Terry into an even deeper level of confusion and despair.⁵⁰ During the period of the Johnson rapes, friends and neighbors sensed that there was something severely wrong with Terry.⁵¹ He seemed damaged, confused, and extremely paranoid.⁵²

Terry hid the abuse as best as he could. He played football and ran track, he dated girls from school, and he pretended to have a stable life, but inside he was seething with confusion and anger.⁵³ Terry had no one to turn to and nowhere to go for help. Terry became so psychologically damaged from the abuse that he coped with his pain through self mutilation, suicide attempts, and substance abuse.⁵⁴ Terry believed that hurting himself was the only way to ease his pain.⁵⁵

When Terry was alone, he cut himself frequently and would watch himself bleed. When Terry could not cut himself, he would inflict pain on himself in other ways. He would tear his skin and bang his head on walls.⁵⁶ His high school girlfriend recalls one of these incidents:

Terry completely lost control and started to bang his head against the wall and off the concrete outside. He banged his head so hard that he had to be taken to the hospital . . . The doctor told [Terry's mother] Pat that Terry needed psychiatric help but Pat never followed through with the doctors instructions.⁵⁷

Terry's acts of self mutilation stemmed from deep feelings of hatred – almost all of which were directed at himself. As Terry explained, “The main thing was why did I let these men do these things to me? I hated them and I hated myself afterwards . . . Everything was just coming all at once and I couldn't take it.”⁵⁸

At sixteen, Terry's mental condition further deteriorated after he suffered a violent gang rape at a juvenile detention facility.⁵⁹ After that rape, Terry suffered from nightmares that a man would come into his room and attempt to rape him.⁶⁰ He would awake in a state of utter terror. The gang rape left Terry even more angry, broken, and withdrawn.

Dr. Lisak states that “the violence and abuse that Terry Williams suffered was so severe, and so sustained, that I would not expect any child subjected to such unrelenting trauma to emerge without severe and long lasting psychological damage.”⁶¹ The unrelenting sexual and physical abuse inflicted on Terry for the first eighteen years of his life has caused him to suffer from chronic Post-Traumatic Stress Disorder (PTSD), borderline personality disorder, and major depression.⁶² To this day, Terry suffers secondary symptoms of PTSD, including near constant anxiety, sleep disorders, and nightmares.⁶³

Every aspect of Terry's life, including his sexually abusive relationships with Mr. Norwood

and Mr. Hamilton, were affected by the severe trauma he suffered as a child and the ongoing abuse and exploitation he suffered as an adolescent. By the time Terry was a senior in high school, his behavior had become erratic.⁶⁴ He would scream and yell for no reason.⁶⁵ He was paranoid and thought that everyone was out to get him. At night, Terry routinely cried himself to sleep. He believed that he was a damaged and disgusting person whom nobody could love, and he faulted himself for the rapes because, in his mind, he should have fought back.⁶⁶ As one expert explains,

In terms of Williams' further psychological development, it is my professional opinion that his submission to coercive and forceful rape by older persons during his childhood and adolescence left Terrance traumatized, with a crippling and deep sense of shame and guilt which, despite his high school athletic success, had a profoundly negative effect on his psycho-sexual development, his personal self-image, and his sense of manhood.⁶⁷

Terry's pain and self loathing led to drug and alcohol abuse. Sexual predators, including Mr. Norwood and Mr. Hamilton, recognized Terry's self-hatred and vulnerability and used this to their advantage. They also knew that Terry was only a minor and that he could be easily manipulated. [REDACTED] one of Terry's peers, explains that Terry was just another child for Mr. Norwood to exploit: "Norwood was just getting his kicks out of kids."⁶⁸

As time passed and the sexual assaults became more violent, Terry's hatred for himself began to turn into hatred for the men who were exploiting him. At seventeen years old, Terry killed Herbert Hamilton after Mr. Hamilton showed him child pornography, ordered him to pose naked, and threatened him. Dr. Lisak explained that the number of stab wounds inflicted on Mr. Hamilton is consistent with the rage that Terry was feeling towards all the men who had exploited, abused, and raped Terry during his childhood.⁶⁹

This same rage was apparent on the night of the Norwood killing. Marc Draper, the other

teenager who participated in this crime, recently provided the true details of the offense to Terry's current counsel. In his January 9, 2012, Declaration, Mr. Draper stated that, contrary to his testimony at trial, the motive behind Mr. Norwood's killing was not in fact a robbery, but instead was directly related to the sexual abuse Terry had suffered at the hands of Mr. Norwood.⁷⁰ Draper remembered that Terry "became enraged and was kind of losing his mind right before Norwood was killed."⁷¹ Terry explained that at the time of the murder, he "was angry and very scared and just snapped."⁷²

On the day Terry killed Mr. Norwood, he was only three and one-half months past his eighteenth birthday, the minimum age for the imposition of the death penalty. Terry's youth and lack of maturity were a factor in his reckless, impulsive and ultimately violent behavior. As Dr. Lisak explained, Terry had suffered abuse for most of his life, and the impact of Terry's childhood traumas was cumulative, resulting in severe psychological damage. That psychological damage was apparent on the night he killed Mr. Norwood. Dr. Lisak concluded that, when Terry killed Mr. Norwood, he was acting in an acutely traumatized state triggered in part by the years of terror and rage that he had experienced as a results of abuse by older men – including Mr. Norwood.⁷³

III. Amos Norwood's widow, Mamie Norwood, supports clemency for Terry.

Historically, the Commonwealth has placed great value on providing crime victims and their loved ones with a voice in the criminal justice process. The Commonwealth has the opportunity to continue this important tradition by granting clemency in this case.

Mamie Norwood is Amos Norwood's widow. Since the time of her husband's death, Mrs. Norwood has found the strength to overcome her pain and to forgive Terry for his actions. Mrs. Norwood has come to a place of peace and does not want to see further heartbreak and loss. She has

said that Terry “is worthy of forgiveness” and that she wants his life to be spared.⁷⁴

Mrs. Norwood suffered unimaginable pain and grief upon the loss of her husband. In a considered, peaceful, and reconciliatory step, Mrs. Norwood is asking that this case come to a close without further loss of life.⁷⁵ That resolution, she believes, will provide her with peace and closure. She asks that the Board and the Governor honor her request.

IV. Had jurors known the truth about Terry’s history of abuse, the circumstances of the killing, and the meaning of a life sentence, they never would have sentenced him to death.

The jury that sentenced Terry to death never heard that he was sexually abused or that Mr. Norwood sexually exploited Terry. Five jurors have given sworn statements that if they had heard about Terry’s sexual abuse history, they would not have voted for death.⁷⁶ Jurors did not hear the truth, however, in large part because, as the federal courts found, Terry’s trial attorney’s performance was deficient. (Trial lawyer Panarella was subsequently disbarred, as was one of his associates who assisted in Terry’s case.)

Even in the absence of Terry’s sexual abuse, three jurors said in sworn statement that they would have voted for a sentence of life imprisonment if they had been informed that such a sentence meant that Terry would never be released on parole.⁷⁷ Jurors were under the mistaken impression that if they imposed a life sentence, Terry would have been eligible for release on parole. Juror [REDACTED] stated that “no one told me that a life sentence meant life without parole ever.”⁷⁸ Juror [REDACTED] sharing Moss’s belief, explained why she voted for death: “I thought the death sentence assured that he would never get out.”⁷⁹

Unfortunately, Pennsylvania is the only state in the country in which courts are not required to instruct juries that a life sentence means life without the possibility of parole. No such instruction

was given in Terry's case.

Terry's jurors have reacted strongly to learning the truth about Terry's history, Amos Norwood and Herbert Hamilton, and the actual sentencing options they had at trial. Now armed with complete information, five of Terry's jurors are pleading for Terry's life. Upon learning all of the facts, Juror [REDACTED] stated in no uncertain terms, "I wouldn't want him to die."⁸⁰ These jurors are troubled because they were forced to weigh life versus death without knowing critical and powerful information. They are asking those with the power to exercise mercy to intervene and prevent the execution of a death sentence they now consider a mistake.

V. Terry is truly sorry for the crimes he committed, and he strives to better himself and help others.

Terry is deeply remorseful for killing Herbert Hamilton and Amos Norwood, and he expresses genuine anguish over the pain and loss that their families and communities suffered. In prison, Terry has grown close to God. He prays that the Hamilton and Norwood families can find peace in their lives.

Terry has demonstrated an ongoing desire to become a better person and to make a positive impact on his daughter and on society from behind the prison walls. As Terry's friend described, "Although I did not know him then, the man I know now does have a positive impact on the lives of those he interacts with, even from inside a maximum-security prison."⁸¹ Another of Terry's friends expressed that "Terry is a real human being and a friend to me and others, and his execution would leave me and his other friends as well as his beloved daughter with greatly diminished lives."

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Terry has demonstrated an overall positive adjustment to prison. His record indicates that he will be well managed if he were to spend the remainder of his natural life in prison under a

sentence of life without the possibility of parole. If granted clemency, he will gladly and obediently accept his punishment.

VI. Executive clemency has been granted in four other states within the past three years.

Between 2009 and 2012, five Governors from four states commuted the death sentences of five men facing imminent execution where, as here, the mitigating evidence suggested that mercy should be exercised.

On January 17, 2012, Governor Jack Markell of Delaware granted clemency to Robert Gattis. In 1992, Gattis killed his long time paramour, 27 year-old Shirley Slay, after she refused to allow him in her apartment. Gattis, who was warned by police the day before the murder not to contact Ms. Slay, went to Ms. Slay's house and shot her between the eyes. In granting clemency, Governor Markell cited the extensive physical abuse Gattis suffered at the hands of his father and step-fathers, the sexual abuse Gattis suffered beginning in early childhood, his substantial family dysfunction, and the neglect he experienced as an adolescent.

On September 26, 2011, Governor John Kasich of Ohio granted clemency to Joseph Murphy. In 1987, Murphy killed 72-year-old Ruth Predmore, when she refused to comply with his demand for money, by slicing her neck so deeply, from ear to ear, that the wound reached to her spinal cord. In granting clemency, Governor Kasich cited the "uniquely severe and sustained verbal, physical, and sexual abuse from those who should have loved [Murphy]." Ms. Predmore's daughter supported clemency for Murphy.

On January 11, 2011, Governor Phil Bredesen of Tennessee granted clemency to Edward Jerome Harbison. In 1983, Harbison killed 62-year-old Edith Russell, for whom he used to do home repairs, after she interrupted Harbison and his accomplice robbing her home. Harbison struck her

in the head at least three times with a 25-pound marble vase, breaking all of the bones of her head, expelling brain tissue, and disfiguring her beyond recognition. Although Governor Bredesen gave no specific reason for granting clemency, Harbison's attorneys based Harbison's clemency application on the profound impact of his wretched childhood, which was filled with poverty and abuse.

On May 19, 2010, Governor Brad Henry of Oklahoma granted clemency to Richard Tandy Smith. In 1986, Smith killed 28-year-old John Cederlund, a drug dealer, after the man refused Smith's gunpoint demand to give him money and drugs. Smith shot Mr. Cederlund in the chest with a 12-gauge shotgun, destroying his heart. The sentencing jury never heard about Smith's harsh upbringing, including the abuse he suffered as a child, his addiction problems, and mental health issues. Six jurors supported clemency for Smith.

On February 12, 2009, Ohio Governor Ted Strickland granted clemency to Jeffrey Hill. In 1991, Hill killed his 61-year-old partially paralyzed mother, Emma. Hill stabbed her ten times. In recommending clemency, the parole board cited Hill's expressions of remorse and mitigating evidence regarding the abuse that Hill's mother inflicted upon him as a child. The Hill family supported clemency for Jeffrey Hill.

In each of these cases, governors and their pardons boards recognized that the original sentencing jury and judge had not heard all of the mitigating evidence and extended mercy to the condemned.

Conclusion

Terry Williams prays that this Board consider the mitigating effect of the childhood abuse he suffered, and recognize that the sentencing jury would not have sentenced Terry to death had they known of his abuse. He further prays that this Board consider his young age at the time of the offense – eighteen years old, the minimum age for the imposition of the death penalty.

Terry's violent behavior as a juvenile and at the time of the offense cannot be separated from his sexual exploitation and the traumatic impact that it had on his development and mental state. In Pennsylvania, we have recently learned that undetected childhood sexual abuse is widespread. The sobering events at Penn State and in the Catholic Church have taught us that without intervention, the effects of childhood sexual abuse are profound and tragic.

There was no intervention for Terry Williams. He was at the mercy of his abusers from the age of six until his incarceration for the current offense. His abusers included his mother and stepfather, a public school teacher, a neighbor, and a church youth minister. The long lasting and continuous abuse has left psychological scars and provides a clear explanation for his crimes.

In light of the wishes of Mamie Norwood, and for all of the other reasons explained herein, we respectfully request that Terry Williams's death sentence be commuted to a sentence of life imprisonment without the possibility of parole.

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4. Dr. Lisak is a clinical psychologist and Associate Professor of Psychology at the University of Massachusetts Boston. For over twenty five years, Dr. Lisak has studied the long term effects of childhood abuse childhood physical and sexual abuse on the development of men and the relationship between early abuse and the later perpetration of interpersonal violence. He is a nationally recognized expert in his field expert in the field and has extensive experience interviewing and counseling male victims of sexual abuse. Dr. Lisak sits on the Board of Directors of the organization *lin6*, which was founded to assist men who were sexually abused as children.
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56. Tab 2, App. 193-194, 218.
57. App. 162.
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