



**2006 PENNSYLVANIA STATEWIDE
HIGH SCHOOL MOCK TRIAL COMPETITION**

***Commonwealth of
Pennsylvania***

v.

Teaberry Olson

**SPONSORED BY THE YOUNG LAWYERS DIVISION
OF THE PENNSYLVANIA BAR ASSOCIATION**

*Adapted with permission from an original case by
Center for Civic Values
Albuquerque, New Mexico*

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Problem Questions & Contact Information

Questions concerning these case materials should be sent to David Keller Trevaskis at the Pennsylvania Bar Association (PBA). Case material questions will be answered in cooperation with the Statewide Mock Trial Executive Committee. Questions regarding mock trial procedure, including any questions involving the Rules of Competition or Rules of Evidence (Pennsylvania Mock Trial Version), should be directed to your District or Regional Mock Trial Coordinators.

Answers to legitimate and non-repetitive questions will be posted on the mock trial Web site www.pabar.org under the Young Lawyer's Division (YLD) link (direct access at www.pabar.org/yldstatewidemock.shtml). The questions and answers will be posted in a single supplemental memo; the memo will be continually updated.

You may begin submitting questions anytime. **The deadline for submitting questions is January 19, 2006.** The final update to the supplemental memo will be posted by January 23, 2006. The final memo will become the official supplemental memo and may be used in the competition. Earlier dated copies may not be used. Please consult Rule of Competition 3.3 concerning the evidentiary value teams are to give the official supplemental memo.

Questions must be sent in writing by one of the methods listed below. Please be sure to include return contact information in the event we need to reach you to clarify a question.

NO QUESTIONS WILL BE CONSIDERED UNLESS SUBMITTED UNDER THIS PROCEDURE.

E-mail: david.trevaskis@pabar.org

Regular Mail: David Keller Trevaskis
Pennsylvania Bar Association.
100 South Street
PO Box 186
Harrisburg, PA 17108-0186

Fax: 717.238.7182

Teams without access to the Web site can request paper copies from Jayanne Hayward at the PBA (jayanne.hayward@pabar.org). She has the same address and fax number as above. Please be sure to include your return address.

Introduction and Acknowledgments

Welcome to the 2006 Pennsylvania Statewide High School Mock Trial Competition - the twenty-second year of one of the top secondary level academic competitions in the commonwealth! The competition, which commenced in 1984, is sponsored by the Young Lawyers Division of the Pennsylvania Bar Association (PBA/YLD). It provides high school students with firsthand experience of the American judicial system.

This year's case involves the murder of a homeless woman. The case materials were adapted with permission from an original case by the Center for Civic Values, Albuquerque, New Mexico and later used by the Minnesota Mock Trial Program sponsored by the Minnesota State Bar Association. Rob Stapleton, a past problem author and current federal government attorney in Washington, D.C., led the initial effort to adapt the problem for use in Pennsylvania.

The 2006 case materials were later revised and edited for competition purposes by members of the Statewide Mock Trial Committee which is chaired by Bedford County District Attorney Bill Higgins. Special thanks is given to YLD leadership under Chair Jennifer J. Clark of Lackawanna County for assistance in developing the problem materials and organizing the competition. Jane Meyer, past mock trial chair, provided invaluable assistance throughout the development process and completed the final version of the problem.

Drafts of the problem benefited from the careful editing of Montgomery County attorney Donna Adelsberger, Philadelphia lawyer Amy Niedzalkoski and Anne Panfil, chief counsel for the Criminal Rules Committee of the Pennsylvania Supreme Court. Past mock trial authors and now-practicing attorneys Stapleton and Gerald Plourde of Philadelphia also provided their assistance, as did PBA Pro Bono Coordinator David Trevaskis. We also thank Marsha Cohen of the Homeless Advocacy Project for her review of the problem and for providing suggestions for educational extensions of the problem. Special thanks are given to Julia Haines of Haines & Associates, Professor Tony Bocchino of James E. Beasley Temple University School of Law and Temple law student Margeau Ney for their efforts in submitting a potential problem for our consideration. We encourage anyone interested in submitting problem ideas or drafts to contact Jayanne Hayward at the PBA directly.

We also thank the hundreds of volunteers who annually contribute their time and energy to the overall organization and running of the program, spearheaded by Mock Trial Chair Higgins. Last, but certainly not least, we thank the PBA staff, headed by Executive Director Barry Simpson and Deputy Executive Director Fran O'Rourke. Many PBA staffers, too numerous to mention, provided valuable time and talent throughout the mock trial season and without their help the competition would not be the success that it is. A special thanks is merited to Jayanne Hayward, the YLD Coordinator at the PBA, who serves as the main point of contact for the entire program.

We hope that teams find the materials interesting, and we wish them the best of luck!

Statement of Facts

On November 20, 2004, the body of a homeless woman, Terese Jameson, was discovered by Officer D.J. Moats in a trash dumpster in an alley behind the Terrible Towel Café in downtown Barrister, Pennsylvania. The victim had formerly been employed at the café, a downtown landmark renowned for its half-pound, all-beef burgers. The victim had visited the café on the morning of November 20 with her child, 14-year-old Dani Jameson, to try to persuade the owner, defendant Teaberry (a/k/a Tee) Olson, to rehire her. Upon their arrival, Ms. Jameson went into the café while Dani Jameson waited outside. A short time after meeting with Tee Olson, Ms. Jameson was discovered dead in the dumpster. A brick, stained with her blood and containing Tee Olson's fingerprints, was found on top of the body.

According to Dani Jameson, Tee Olson had fired his/her mother three weeks earlier after she confronted Olson with her suspicion that Olson was using horsemeat in the Terrible Towel Café's famous burgers. On the morning in question, the victim, desperate for a job, went to the café intending to tell Olson that unless s/he rehired her, she would report Olson's use of horsemeat to city health authorities. Dani claims to have heard Olson threaten his/her mother just prior to her murder.

The only other person in the Terrible Towel Café on the morning of November 20, 2004, was Sandy Wilbur, the meat delivery driver. Wilbur denies having witnessed any kind of altercation between Olson and the victim, although Wilbur did observe a group of teen-aged boys hanging around the dumpster. Stephen "Big Dog" Wade, a local gang leader with a reputation for preying upon the homeless, was reportedly in the area and hasn't been seen since shortly after the murder.

At trial, Officer D.J. Moats and Dani Jameson will testify for the prosecution. Sandy Wilbur and the defendant, Teaberry Olson, will testify for the defense. Defendant has been charged with third degree murder.

COMMONWEALTH OF PENNSYLVANIA * **IN THE COURT OF COMMON PLEAS**
* **BARRISTER COUNTY, PENNSYLVANIA**
*
v. *
* **Criminal Action No.: 2004 CR 3399**
*
TEABERRY OLSON, * **Charge: Criminal Homicide**
Defendant *

CRIMINAL COMPLAINT

I, Police Officer D.J. Moats, Badge 26, Barrister City Police Department, Barrister Pa., do hereby state:

1. I accuse Defendant Teaberry Olson, who resides at 998 North Second Street, Barrister, with violating the penal laws of the Commonwealth of Pennsylvania;
2. The day of the week and the date when the accused committed the offense was on (or about) Saturday November 20, 2004, at The Terrible Towel Café, 202 Walnut Street, Barrister Pa., in the County of Barrister;
3. The accused committed acts against the peace and dignity of the Commonwealth of Pennsylvania and contrary to the Act of Assembly; specifically, the murder of Terese Jameson as described in the attached Probable Cause Affidavit.
4. I ask that a warrant of arrest or summons be issued and that the accused be required to answer the charges I have made (*In order for a warrant of arrest to issue, the attached affidavit of probable cause must be completed and sworn to before the issuing authority*); and
5. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information and belief. I certify the complaint has been properly completed and verified, and that there is probable cause for the issuance of process.

Date: 12/7/04 /s/ Officer D.J. Moats
(signature of complainant)

AND NOW, on this date, Dec. 7, 2004 I certify the complaint has been properly completed and verified, and that there is probable cause for issuance of process.

/s/ J.J. Rosenhaus, Magisterial District Judge
Issuing Authority

PROBABLE CAUSE AFFIDAVIT
BARRISTER CITY POLICE DEPARTMENT

Incident Number: 2003070893 BAR DATE: Dec. 7, 2004

Charge(s): 18 Pa.C.S.A. § 2502 Murder

Commonwealth v. Teaberry Olson

I, the undersigned, do hereby state under oath (affirmation):

1. My name is Officer D.J. Moats of the Barrister City Police Department;
2. I am a representative of the BCPD, which has been investigating the murder of Terese Jameson on November 20, 2004, in the City of Barrister, Barrister County.
3. The BCPD has received the following information regarding the murder of Terese Jameson:
 - On November 20, 2004, at around 9:15 a.m., while patrolling the downtown district in Barrister, I was approached by a teenager in the front of 202 Walnut Street at the Terrible Towel Café. The teenager told my partner and me that her/his mother, Terese Jameson, had just been in an altercation inside the Terrible Towel with the owner, Teaberry Olson. Dani Jameson reported that s/he could not find her/his mother. Dani Jameson also stated that after the altercation s/he saw Olson throw something that looked like a brick into the dumpster located in the alley behind the Café.
 - I spoke with Olson at the scene who admitted s/he had spoken to the victim a short time earlier and that the victim had formerly worked in the Café and had asked to be rehired. Olson had declined to re-hire the victim. Olson denied knowledge of the victim's whereabouts after their conversation.
 - While investigating in the dumpster behind the café, I observed a brick covered with a damp reddish-brown substance, which looked like blood. Upon climbing inside to retrieve the brick, I discovered the victim's body.
 - On November 26, 2004, I interviewed Dani Jameson who stated that Teaberry Olson had previously fired the victim because she had discovered that Olson was using horsemeat in the café's burgers and that the victim had threatened to alert the authorities.
 - The December 3 autopsy report stated the cause of death was blunt trauma to the head, consistent with a blow struck by a brick. Olson's fingerprints were identified on the brick. Fragments of the brick were found in the victim's scalp and her skull fragments were found embedded in the brick.
 - On December 6, I spoke again with Olson who admitted throwing a brick in the dumpster.
4. Based on the aforementioned information, I request that an arrest warrant be issued for Teaberry Olson, whose residence is 998 North Second Street, Barrister, PA.

I swear to or affirm the above information upon my knowledge, information, belief, and sign it on December 7, 2004, before J.J. Rosenhaus, whose office is that of Magisterial District Judge.

/s/ J.J. Rosenhaus, Magisterial District Judge
Signature and Seal of District Judge

/s/ Officer D.J. Moats
Signature of Affiant

| | | |
|-------------------------------------|---|--|
| COMMONWEALTH OF PENNSYLVANIA | * | IN THE COURT OF COMMON PLEAS |
| | * | BARRISTER COUNTY, PENNSYLVANIA |
| | * | |
| v. | * | |
| | * | Criminal Action No.: 2004 CR 3399 |
| | * | |
| TEABERRY OLSON, | * | Charge: Criminal Homicide |
| Defendant | * | |

WARRANT

TO ANY AUTHORIZED PERSON:

Pursuant to this warrant, you are commanded to arrest Teaberry Olson, Defendant, if found in the Commonwealth of Pennsylvania and bring said Defendant before the undersigned to answer the foregoing complaint.

/s/ J.J. Rosenhaus, Magisterial District Judge
Issuing Authority

COMMONWEALTH OF PENNSYLVANIA * **IN THE COURT OF COMMON PLEAS**
* **BARRISTER COUNTY, PENNSYLVANIA**
*
v. *
* **Criminal Action No.: 2004 CR 3399**
*
TEABERRY OLSON, * **Charge: Criminal Homicide**
Defendant *

ARRAIGNMENT

I, Teaberry Olson, have been advised of the offense(s) charged in the criminal complaint against me by the District Attorney of Barrister County and I/my lawyer have/has received a copy thereof.

I have been advised and fully understand that I/my lawyer have/has the right to request discovery or disclosure from the District Attorney as provided by the Rules of Criminal Procedure within fourteen (14) days of today's arraignment date.

I have been advised and I fully understand that I/my lawyer have/has the right to file with the Court any pre-trial application for relief in the form of a single omnibus pre-trial motion as provided by the Rules of Criminal Procedure within thirty (30) days of today's arraignment date.

I hereby enter a plea of Not Guilty to the above charges and request a trial by Jury.

Preliminary Hearing is scheduled for March 22, 2005
If bound over, Trial is scheduled for the February – March 2006 Term of Criminal Court.

Date: December 15, 2004

/s/ Teaberry Olson
Defendant

/s/
Attorney for Defendant

/s/
Attorney for the Commonwealth

COMMONWEALTH OF PENNSYLVANIA * **IN THE COURT OF COMMON PLEAS**
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INFORMATION

The charge(s) having been bound over for court by the Magisterial District Judge following a Preliminary Hearing, THE DISTRICT ATTORNEY of Barrister County by this information charges that, on (or about) November 20, 2004, in said County, Teaberry Olson,

First Count:

did kill Terese Jameson with malice.

All of which are against the Act of Assembly and the Peace and Dignity of the Commonwealth of Pennsylvania.

/s/

District Attorney

Citation(s): MURDER OF THE THIRD DEGREE – 18 Pa.C.S.A. § 2502(c)

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Defendant *

STIPULATIONS

1. All documents, exhibits and signatures 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. The parties reserve the right to dispute any legal or factual conclusions based on these items and to make objections other than to authenticity.
2. Jurisdiction, venue and chain of custody of the evidence are proper.
3. All statements made by witnesses and all physical evidence and exhibits were Constitutionally obtained.
4. The autopsy report included the following conclusions:
 - (a) Terese Jameson was killed as a result of blunt force trauma to her head, consistent with a blow struck by a brick of similar size and dimensions to the brick shown in Exhibit 1;
 - (b) Terese Jameson's blood and skull fragments were found on and in a brick lying near her body, as pictured in Exhibit 1;
 - (c) brick fragments, similar to those obtained from the brick shown in Exhibit 1, were found in Terese Jameson's skull;
 - (d) three identifiable fingerprints found on the brick were matched to Teaberry Olson; and
 - (e) three finger prints were observable on the brick but all were unidentifiable due to poor quality.

/s/
Attorney for Commonwealth

/s/
Attorney for Defendant

November 16, 2005

APPLICABLE LAW OF BARRISTER COUNTY

COMMONWEALTH CRIMES CODE

18 Pa.C.S.A. § 2501. Criminal homicide

(a) **Offense defined.** -- A person is guilty of criminal homicide if he intentionally, knowingly, recklessly or negligently causes the death of another human being.

(b) **Classification.** -- Criminal homicide shall be classified as murder (of the first, second or third degree), voluntary manslaughter, or involuntary manslaughter.

18 Pa.C.S.A. § 2502. Murder

(a) **Murder of the first degree.**-- A criminal homicide constitutes murder of the first degree when it is committed by an intentional killing.

(b) **Murder of the second degree.** -- A criminal homicide constitutes murder of the second degree when it is committed while defendant was engaged as a principal or an accomplice in the perpetration of a felony.

(c) **Murder of the third degree.** -- All other kinds of murder shall be murder of the third degree. Murder of the third degree is a felony of the first degree.

JURY INSTRUCTIONS

At the conclusion of a jury trial, the judge will instruct the jury how to apply the law to the evidence. Hypothetically, if the judge in your mock trial case were to provide instructions to the jury, they would look something like the following:

[Please note: A copy of these instructions may not be used as an exhibit during the mock trial competition; however, students may use these concepts in fashioning their case and making arguments to the jury.]

1. Criminal Homicide – Introduction. (Based upon Pa.S.S.J.I (Crim) 15.2501A)

The defendant is charged with taking the life of Terese Jameson by criminal homicide. There is one possible verdict that you might reach in this case – not guilty or guilty of murder of the third degree.

Before defining this crime, I will tell you about malice, which is an element of murder. A person who kills must act with malice to be guilty of any degree of murder. The word “malice” as I am using it, has a special legal meaning. It does not mean simply hatred, spite, or ill-will.

For murder of the third degree, a killing is with malice if the perpetrator’s actions show his or her wanton and willful disregard of an unjustified and extremely high risk that his or her conduct would result in death or serious bodily injury to another. In this form of malice, the Commonwealth need not prove that the perpetrator specifically intended to kill another. The Commonwealth must prove, however, that he or she took action while consciously, that is knowingly, disregarding the most serious risk he or she was creating, and that, by his or her disregard of that risk, he or she demonstrated his or her extreme indifference to the value of human life.

2. Third Degree Murder Defined. (Based upon Pa.S.S.J.I (Crim) 15.2502C)

Third degree murder is any killing with malice (that is not first or second degree murder). To find the defendant guilty of this offense, you must find the following elements have been proven beyond a reasonable doubt:

- First*, that Terese Jameson is dead;
- Second*, that the defendant killed her; and
- Third*, that the defendant did so with malice.

The word “malice,” as I am using it, has the meaning I described above; that is, malice exists if the perpetrator’s actions show his or her wanton and willful disregard of an unjustified and extremely high risk that his or her conduct would result in death or serious bodily injury to another.

3. Presumption of innocence; reasonable doubt; burden of proof.

A defendant in a criminal action is presumed innocent until proven guilty. This presumption places upon the Commonwealth the burden of proving the defendant guilty beyond a reasonable doubt. This does not mean that no possible doubt must exist, because some doubt

will always exist. Beyond a reasonable doubt means that a juror, after hearing all of the evidence, is convinced to a moral certainty that the defendant is guilty.

4. Credibility of witnesses.

You alone are the judges of the credibility of the witnesses and the weight to be given to the testimony of each of them. In determining the credit to be given any witness, you should take into account her or his truthfulness or untruthfulness, his or her ability and opportunity to observe, his or her memory, his or her manner while testifying, any interest, bias or prejudice s/he may have and the reasonableness of his or her testimony considered in the light of all the evidence in the case

5. Duty to follow instructions.

The law governing this case is contained in these instructions, and it is your duty to follow that law. You must consider these instructions as a whole. You must not pick out one instruction or parts of an instruction and disregard others.

6. Jury must not consider penalty.

You must not concern yourself with the consequences of your verdict.

7. Jury sole judge of facts; sympathy or prejudice not to influence verdict.

You are the sole judges of the facts in this case. It is your duty to determine the facts from the evidence produced here in court. Your verdict should not be based on speculation, guess or conjecture. Neither sympathy nor prejudice should influence your verdict. You are to apply the law as stated in these instructions to the facts as you find them, and in this way decide the case.

8. Role of Jury – Deliberations; Unanimous Verdict, Duty to consult.

Your verdict must represent the considered judgment of each juror. In order to return a verdict, it is necessary that each juror agrees. Your verdict must be unanimous.

It is your duty to consult with one another and try to reach an agreement. However, you are not required to give up your individual judgment. Each of you must decide the case for yourself, but you must do so only after an impartial consideration of the evidence with your fellow jurors. You are the judges -- judges of the facts. Your sole interest is to ascertain the truth from the evidence in the case.

List of Witnesses

The prosecution and defense must call each of these witnesses. The defendant is permitted to sit at counsel table.

For the Commonwealth

- Police Officer D.J. Moats, Barrister City Police Department
- Dani Jameson, Child of the Murder Victim Terese Jameson

For the Defendant

- Sandy Wilbur, Meat Delivery Driver
- Teaberry Olson, Defendant Café Owner

STATEMENT OF OFFICER D.J. MOATS

1 My name is D.J. Moats, and I'm an officer with the Barrister City Police Department. I joined the
2 force right after high school. I didn't have the money for college and I didn't have the grades to
3 get someone else to pay for it so I joined the BCPD. I met all the requirements like having a
4 high school degree, no felony convictions, no DWIs or misdemeanor violations within the past
5 three years and I met all physical fitness requirements. I applied, was accepted and went
6 through the 23-week training at the BCPD academy. I passed all the tests. I was so pumped.
7 Imagine it! I was a real cop. It's true I don't have a big fancy title like some of my friends from
8 high school, but what work could be more important? After all, where would the city be without
9 us?

10
11 The BCPD serves a population of 150,000 residents. We've had some rough times in this city,
12 but we've had a recent drop in serious crime. I'd say, in light of recent statistics, we've got a
13 pretty good handle on it. We have approximately 220 sworn officers, which is a decent ratio for
14 a city our size. I really love my work. I don't remember the exact words of our mission, but it's
15 all about improving the quality of life in Barrister by protecting life and property, maintaining
16 order, and reducing crime through prevention and education. We take that very seriously.

17
18 One of the BCPD programs I work with is Barrister Crime Free Multi-Housing Program. The
19 primary purpose of the program is to help rental property owners, especially landlords who rent
20 to low income tenants that receive Section 8 housing vouchers. Our goal is to become more
21 effective partners in keeping apartment communities safe. As I always tell my landlords at our
22 trainings, if criminals operate out of rental properties, neighborhoods suffer and property owners
23 pay a hefty price for that, including decline in property values, loss of rental income during the
24 eviction and repair process, damage arising from abuse, retaliation and neglect, toxic
25 contamination and/or fire resulting from drug manufacturing or growing operations. There can
26 even be civil penalties. My partner and I do inspections and then write up recommendation
27 reports for the landlords. It's mostly lists of things they can do to protect their property, but
28 occasionally, we have to give them orders.

29
30 There is a lot of work going on to revitalize the downtown Barrister area, but it still has its
31 problems. For instance, there are two homeless shelters downtown, which means there are
32 always a lot of homeless people out on the streets. To make matters worse, there are gang
33 members who target them. Of course, these incidents aren't peculiar to Barrister. I'm sorry to
34 say it's happening all over the country - New Jersey, California, Texas, and so on. We've had
35 some violent incidents here, too. About three months before Terese Jameson was murdered, a
36 homeless man was severely beaten with a rock and rendered comatose. He was robbed of his
37 few possessions. That happened only two blocks from where Ms. Jameson was murdered.

38
39 The chief thought the problem was so serious that my partner and I now spend as much time on
40 the streets downtown as we do inspecting buildings and dealing with landlords. It was on one of
41 those walking patrols that I met Teaberry Olson. S/He has a lot of opinions about how the
42 department, including me, could be doing a better job. Olson owns the Terrible Towel Café and
43 an apartment building not too far from there. The restaurant is a downtown landmark and very
44 popular, but the apartments have big problems, and I know the city has threatened to close
45 them because of fire code violations.

46
47 During my downtown street patrols, Olson has pulled me aside a number of times, all buddy-
48 buddy, to see if there wasn't something I could do about the number of homeless people

49 hanging around the neighborhood. S/He was sure the shelters and the people who used the
50 services were driving away business. S/He said the customers didn't want to come to a
51 restaurant where they had to deal with three or four panhandlers on the way up the block. We
52 tried to explain that we weren't in the neighborhood to protect the Terrible Towel from homeless
53 people, and that instead our primary job was to protect all the citizens, including protecting the
54 homeless folks from the teen gang that was harassing, assaulting and robbing them. Olson was
55 ticked off at the idea that we were investing any time protecting homeless people. S/He wanted
56 to know why we weren't spending our time and her/his tax dollars protecting her/his businesses
57 from the negative impact of the shelters, including the gang.

58
59 You know, I heard through one of my confidential informants that Olson had approached the
60 gang leader, Stephen "Big Dog" Wade, in the Fall of 2004 about providing "protection" for the
61 Terrible Towel, but I could never get a line on any hard evidence, so I had to let that drop.
62 Anyway, Olson and I had words about the situation several times, and s/he just wouldn't believe
63 that we were doing our best to make the area safe for everyone. I think s/he basically just
64 dislikes homeless people. I don't think that really came through in the complaint letter s/he
65 wrote to my supervisor, but I'm sure that's how s/he feels. I got written up over that letter, and,
66 believe me, I wasn't happy about it. In any event, Olson is just plain wrong; the police and
67 outreach workers regularly comb the streets and take the homeless to the shelters, especially in
68 cold weather. We don't allow the homeless to sleep outside in cold weather.

69
70 Anyway, around 9:15 a.m. on the morning of November 20, 2004, which was a Saturday, my
71 partner and I were patrolling the neighborhood around the Terrible Towel. This kid, whose
72 name I have since learned is Dani Jameson, came running up to us from the alley by the Café.
73 S/He was out of breath and very upset and told us her/his mom had just been in some kind of
74 altercation with Teaberry Olson inside the Terrible Towel. Dani said that Olson had fired Ms.
75 Jameson a few weeks earlier after she confronted her/him about adding horsemeat to the
76 hamburgers. According to Dani, her/his mother disappeared after the confrontation that
77 morning. Dani said that when s/he asked Olson about it, Olson snapped back that Ms.
78 Jameson had left earlier. Dani also told us that after leaving the café, s/he saw Olson throw
79 something that looked like a brick into the dumpster located in the alley behind the café.

80
81 I told my partner to take Dani to the fast food place down the street, and I went to investigate. I
82 knocked on the back door of the Terrible Towel Café and Olson answered. S/He did not invite
83 me in, but when I asked, s/he told me that Ms. Jameson was an ex-employee who had been
84 there earlier. S/He had been asking to be rehired, but Olson said s/he refused, and let her out
85 the back door. S/He told me I could verify all of this by talking to one Sandy Wilbur, a meat
86 delivery driver who had been present in the café when Ms. Jameson had come to talk with
87 her/him. Olson flatly denied any knowledge of Ms. Jameson's whereabouts.

88
89 I went into the alley to look around, and I saw a big bag of garbage sitting by the dumpster. I
90 lifted up the lid and inside the dumpster, right on top of all the trash, I saw a brick that was a sort
91 of tan or gold color. One corner and side were covered with a damp reddish-brown substance,
92 which looked like blood. I couldn't reach the brick, so I climbed inside the dumpster. That's
93 when I found the woman. I immediately called for an ambulance. I also called Olson outside.
94 Olson appeared nervous and asked me what I wanted. I directed Olson to the dumpster. Olson
95 gasped upon looking in and identified the woman as Ms. Jameson. Olson insisted s/he knew
96 nothing about what happened to Ms. Jameson after she left the café. S/He also denied ever
97 having touched the brick. In surveying the area, I noticed that some of the building's facing was
98 crumbling. The brick appeared to be from a section that was deteriorating.

99

100 Ms. Jameson was pronounced dead at the scene, and the body was taken to the coroner's
101 office to be autopsied. In the meantime, I called Barrister County Children & Youth Services
102 because I knew the Jamesons were homeless, and Dani had nowhere to go. A social worker
103 met me at the fast food place. I had the unfortunate job of telling Dani that Ms. Jameson was
104 dead. S/He was taken into protective custody to the county juvenile center for eventual
105 placement into foster care or the like.

106

107 I interviewed Dani on Friday, November 26, at the juvenile facility. S/He was alternately in tears
108 and very angry, of course, and insisted that Olson was responsible for everything that was
109 wrong in her/his life. S/He repeated the entire story about the horsemeat, Ms. Jameson's being
110 fired and her attempt to be rehired, the brick, Dani's confrontation with Olson, the whole nine
111 yards. Dani's second telling of the story was consistent with the first. I also talked with Dani
112 about whether anything was missing from her/his mother's body. S/He told me her/his mother
113 always wore a little gold-plated necklace that Dani had given her. The necklace was on the
114 body when I found it in the dumpster. The only other thing she had, Dani told me, was a plastic
115 bag that had a few clothes and a hairbrush in it. The bag was found in the dumpster, too.

116

117 I interviewed Sandy Wilbur December 1. S/He had little to offer, but confirmed s/he was at the
118 café when Ms. Jameson had come to see Olson. S/He said s/he heard no loud or angry voices
119 coming from the back of the café during the time the two were talking. S/He also said the
120 company for which s/he worked, Prime Cuts Meat Company, was the sole meat provider for the
121 Terrible Towel, and s/he denied any knowledge of horsemeat being used at the café. S/He
122 concluded by saying that s/he left the café about ten minutes after Olson and Ms. Jameson had
123 spoken. S/He exited through the back door to return to her/his delivery truck. Wilbur heard
124 laughing and yelling coming from the area by the dumpster behind the Terrible Towel. Upon
125 looking up the alley, s/he saw four or five teenaged boys looking inside the dumpster. When
126 they saw her/him, they slammed down the lid and ran "like rats" in the opposite direction. Wilbur
127 recognized the kids as gang members who Wilbur had seen in the downtown area during other
128 deliveries, although Wilbur didn't know any by name.

129

130 When the autopsy report came back December 3, 2004, it showed the cause of death to be
131 blunt trauma to the head, consistent with a blow struck by a brick. Further, fragments of the
132 brick were found in Ms. Jameson's scalp and her skull fragments were embedded in the brick.
133 Forensics tests revealed the brick bore some unidentifiable prints, but three prints could be
134 identified as Olson's. Olson agreed to talk December 6 and when I told her/him about the
135 fingerprint evidence, s/he claimed that s/he now recalled throwing a brick in the dumpster while
136 taking out the morning trash. Her/His excuse for not remembering when I first questioned
137 her/him about it, was that Dani's verbal attack had rattled her. I definitely remember the big bag
138 of trash was on the ground when I found the body, not in the dumpster. I think Olson had
139 intended to use the trash to cover up the body and the brick, but s/he was interrupted by Dani.
140 Anyway, with the fingerprints I had enough to file charges against Olson.

141

142 The day before I spoke with Sandy Wilbur, November 30 I believe, I ran into Big Dog Wade
143 during my patrol downtown and briefly questioned him. He has a reputation for acting like a big
144 shot, but was really just a bully. From my observations, he only takes on people smaller than he
145 or those who can't defend themselves. Big Dog admitted he was in the downtown area the
146 morning that Terese Jameson was killed and that he and his gang were near the dumpster later
147 that morning, after more police and the ambulance arrived. He denied that a truck driver came
148 out one of the back doors into the alley and had seen them. He said they did like to "clean up

149 the neighborhood" by "encouraging" homeless people to get out or at least stay out of sight, but
150 that they would never resort to killing anyone. Big Dog has disappeared since then, probably
151 because he's the prime suspect in the beating of that homeless man, who the paper reported
152 has come out of his coma. In light of the fingerprint evidence in this case, however, he is not
153 the prime suspect.

154
155 I am convinced Olson is the responsible party. During my investigation, I obtained Prime Meats'
156 quarterly invoices and noticed that Olson started purchasing much less beef in the Fall 2004
157 than earlier in the year. Olson's motive was to shut Ms. Jameson up about the horsemeat.
158 Olson had the motive and the opportunity. And I'm also sure that Sandy Wilbur is involved. I
159 just can't prove it, yet.

Witness Addendum

I have reviewed this statement, and I have nothing of significance to add.

The material facts are true and correct.

DATE **March 22, 2005**

SIGNED

D.J. Moats

D.J. Moats

Signed and Sworn to before me

Loida Ingrid Vega

Loida Ingrid Vega, Notary Public, Commonwealth of Pennsylvania

My commission expires: **November 18, 2006**

STATEMENT OF DANI JAMESON

1 My name is Dani Jameson. I'm now 15 years old. Terese Jameson was my mom. I'm giving
2 this statement because she was murdered. Now I'm stuck with juvenile delinquents at the
3 county detention center waiting for foster parents to take me, if anyone wants me. Most people
4 want younger kids, though, not a teenager like me. Anything would be better than this, except
5 living in a shelter, some of which are really awful. My mom and I were homeless right before
6 she was killed.

7
8 There's no way Ronald Jameson, my mom's husband and my stepdad, would take me, even if I
9 knew where he was. The whole reason my mom and I became homeless in the first place is
10 because he abandoned us and left town with another woman in Spring 2004. Without two
11 incomes, my mom couldn't afford rent, food, medication and all our other bills by herself with a
12 minimum wage job at the Mega-Mart. So, we were evicted on August 2, 2004, from our three-
13 room apartment and had to stay in the Circle of Hope shelter downtown. We were new to
14 Barrister because my stepdad was always moving, so we didn't even have friends to stay with.
15 The shelter was crowded. Mom soon lost her job at Mega-Mart because the buses didn't run
16 there from the shelter.

17
18 We searched and searched for a cheap apartment, but we couldn't find one. There is practically
19 no public housing in Barrister, and it's too dangerous in any event. She tried to get low-income
20 housing vouchers, but the government only doles out so many. There's a huge waiting list. I
21 remembered her telling me there were about 3,000 qualified households in line in front of us to
22 get vouchers in Barrister County. We didn't even care about heat or electricity. We could do
23 without that. We even went without food to save money for rent, and my mom stopped taking
24 her asthma medication. Like my mom said, it's impossible to afford even the essentials on
25 \$5.15 per hour. I wanted to try and get a job to help with the bills but my mom wouldn't let me.
26 She said I needed to go to school. I hate school. I don't have any friends and the other kids
27 make fun of me because I lived at the shelter.

28
29 Before my stepdad left, I had no idea how many homeless people there were, especially kids. I
30 was really embarrassed that we had to stay at the shelter, but it was better than the street. After
31 being in there for a few days, I realized there were lots of people in the same predicament my
32 mom and I were in. Although there were some junkies and mentally ill folk, most of the people
33 at the shelter were just like my mom; they wanted to work or actually were working but still
34 couldn't afford an apartment or utilities or gas for a car, even if they had one.

35
36 I hated the shelter but the alternative was the street. In fact, I almost got us kicked out of the
37 shelter at the end of August because I got into a fight. It was during the first week of school but
38 I had cut classes and was wandering around downtown. This kid named Big Dog started
39 making fun of me. He's the head of this gang that beats up homeless people downtown for no
40 reason. I started walking away but he tripped me from behind. He looked like he wanted to
41 attack me so I started running. He caught up with me as I got to the shelter door and started
42 shoving me. I pulled out my pepper spray and maced him. I carry it with me everywhere.
43 When you live on the street, a lot of people harass you, and you need to be able to defend
44 yourself. He was rubbing his eyes and yelling that he was going to get me and all the other
45 shelter cockroaches. He fell to the ground and I started screaming at him and kicking him. I
46 guess I didn't really need kick him, but he made me really mad. I'm tired of being hassled.

47

48 I had had a run in with Big Dog a few months earlier. I went with my mom to the check-cashing
49 place to cash her Mega-Mart paycheck. She had no bank account of course. Big Dog and his
50 gang were hanging out there and told mom and I they liked to wait for some poor slob to cash
51 their welfare or disability check and then take their money. I also overheard Big Dog bragging
52 about how he liked to get homeless people drunk to make them even easier targets. He told his
53 buddies he had bought this poor soul liquor last winter and he got drunk and froze to death.
54

55 The day after my fight with Big Dog I went into the shelter office and took some money. I know
56 they suspected me because somebody discovered it was missing and asked me about it. I
57 denied the whole thing. I told them they miscounted the money. It's not hard to steal and I've
58 only gotten caught one time. I don't know exactly how many times I have taken things, but
59 several for sure. Maybe that's wrong, but if no one will help you, you have to help yourself. I
60 could make excuses but it's as simple as we needed the money for food. Anyway, after they
61 suspected me of theft, I got in big trouble with my mom and with Kim Sanchez, a social worker
62 at the Circle of Hope. She told me I had one more strike and if I screwed up again, she would
63 have to kick us out to another shelter, and that if that didn't work out, I would be placed in foster
64 care. That kind of woke me up. Mom is, or was, pretty much all I had. Anyway, Kim wrote up
65 the incidents and gave copies to me and mom.
66

67 In mid-September, mom got a job at the Terrible Towel, with the help of Kim Sanchez. That's a
68 small café downtown. Kim let my mom use her address on the employment application. I don't
69 know if you've ever tried to get a job without having an address, but I can tell you it's basically
70 impossible. My mom must have filled out 30 applications while we were in the shelter and her
71 interviews always ended right after she explained why she didn't have an address. We got
72 really lucky because just about the same time, we found an apartment to rent. Actually, it was
73 just two rooms over a garage. The rooms were really small and only had one window. That's
74 probably why my mom could afford it. But it was better than the shelter.
75

76 Mom was able to work six days per week and made pretty good tips, but she seemed more
77 worried than usual. She just seemed like something was wrong. It's just a feeling I got. Then
78 one day, I'd say sometime in October, we ran into Kim and my mom told Kim that Teaberry
79 Olson was mixing horsemeat with the beef at the café to cut costs. Kim said to report it to the
80 health authorities, but my mom later told me she was too scared to do that, even though she
81 said she had proof Olson was receiving horsemeat off the delivery truck.
82

83 On October 29, my mom and her boss, Olson, got into a fight. I walked with my mom to work
84 that morning. I would usually walk with my mom to work and then go on to school after she
85 went into the café. That day I really was going to go to school, but then I saw a really cool bike
86 that I really liked chained up outside the restaurant. I went over to look at, when I heard loud
87 voices inside the restaurant. One of the voices was my mom's and the other was Olson's. I
88 looked through the front window of the restaurant, and I could tell my mom and Olson were
89 arguing. They both looked really ticked off and my mom sounded upset. I couldn't hear exactly
90 what she was saying, but I did hear her, in a loud voice, tell Olson that she "knew about the
91 horsemeat and Wilbur."
92

93 Then when my mom came back outside, she told me that Olson had fired her and didn't even
94 give her the paycheck she had coming. Olson told my mom it was because she was late too
95 much and unreliable. I don't know why s/he said that. The only times I remember her not
96 getting to work on time were on Saturdays, when she went at 8:30 a.m., instead of 8:00. And
97 Olson knew she would be late on those days, and s/he said it was fine -- although my mom told

98 me s/he wasn't happy about it. Saturdays I spent at the downtown gym. They had free self-
99 defense and other classes for people who couldn't afford to pay for them. Anyway, a few days
100 after my mom was fired, the rent was due, we couldn't pay, so we got evicted, November 1st I
101 believe. I was so angry when I found out. I mean, it was Olson's fault we got evicted. If s/he
102 hadn't fired my mom, we could have still been living over that garage. I decided right then, if I
103 could make her/him pay for it, I would. I told Kim Sanchez that, and I meant it. I even told
104 Olson that one day I saw her/him on the street.

105
106 For the next three weeks, we lived back at the shelter. Mom tried to find an attorney because
107 she thought she shouldn't have been fired. She also wanted one to help us find housing. I
108 know there are some attorneys who help poor people, but not nearly enough. She couldn't find
109 one and got depressed, and I tried hard not to be for mom's sake. She did try to find other jobs
110 but nobody wanted to give her a job. Kim tried to help my mom get her job back at the Terrible
111 Towel but couldn't. Kim said Olson said mom was unreliable and had provided Kim with a copy
112 of a an October wall calendar from the café. Kim handed us the copy. It had some times
113 scrawled on it. It supposedly showed when mom was late to work. It certainly wasn't anything
114 official. My mom said Olson had changed some of the times. In fact, it looked to me like some
115 of the times were written in after the fact. Anyway, we were getting desperate to get out of the
116 shelter. That's why my mom decided to confront Olson to get her old job back. My mom said
117 she was going to blackmail Olson; she said either Olson would give her job back or she would
118 report the horsemeat.

119
120 On November 20 we went to the Terrible Towel right at 9 a.m., before it opened. Mom was
121 dressed in some nice borrowed clothing so she didn't look at all homeless. We could see in the
122 front window that only two people were inside — Olson and a person sitting at the counter
123 drinking coffee who my mom said was Sandy Wilbur, the horsemeat delivery driver. Olson
124 unlocked the door and let my mom in, but told me to wait outside. They stayed in the front of
125 the restaurant near the counter. I heard Olson tell my mom that Olson wouldn't consider taking
126 her back and said that "if I ever see you again, I'll have to hold myself back to keep from
127 slapping you. I never would have hired you if I had known you were such a loser and so
128 unreliable."

129
130 They walked to the back of the restaurant and I could no longer see them. After a few minutes,
131 Olson returned to the front of the café without my mom, and Olson looked pretty upset to me. I
132 saw Olson say something to Wilbur, and then they both went into the back. I waited a few
133 minutes and I still didn't see or hear my mom, and I got worried. I knew the door of the café was
134 locked, but I tried to get in anyway. I started banging on the door. I didn't stop for several
135 minutes, but nobody came. I ran to the alley to see if the back door was open. Before I got to
136 the back door, I saw Olson with a green trash bag. S/He was standing by the dumpster, and
137 s/he threw something about the size of a brick in. It was tan, just like the bricks on the building.
138 I screamed at Olson and demanded to know where my mom was. Olson told me my mom had
139 left a while ago. Then s/he just turned her/his back on me and hurried back into the café. S/He
140 was in such a hurry that s/he even left the bag of trash on the ground. I tried to follow Olson into
141 the café to ask more questions, but s/he locked the door.

142
143 I ran back around front to see if s/he had opened the front door yet. That's when I saw the two
144 cops. One of them was Officer D.J. Moats who was always around the neighborhood. I told
145 them that my mom had a fight with Teaberry Olson because Olson had fired her for threatening
146 to tell on him about putting horsemeat in the burgers. I said my mom had disappeared, and
147 Olson wouldn't tell me where she was. Moats took off to look for my mom, and the other cop

148 stayed with me. She took me to a fast food place down the street and bought me hot cocoa. A
149 while later, Officer Moats and this woman I'd never seen before showed up. Moats told me my
150 mom was dead, and the woman said she was taking me into protective custody. She asked me
151 if I needed to pack a suitcase, like we owned luggage or something. I told her I already had my
152 "suitcase" with me, which was a paper bag with the only other clothes I had besides the ones I
153 was wearing. She took me to the juvenile facility where I spent the night and where I'm still
154 staying awaiting placement somewhere.

155
156 Officer Moats came and asked me a bunch of questions, and I told her/him the whole story. I
157 explained how Olson fired my mom because she knew Olson was using horsemeat in the
158 burgers and how my mom went to Olson to try to get her job back. I told the Officer about their
159 big fight and how I had seen Olson throw something into the dumpster that looked just like one
160 of the bricks from the building the Terrible Towel is in. There was a brick in the dumpster and
161 they found Olson's fingerprints on it. Now s/he's been arrested. Olson says s/he didn't kill my
162 mom, but I don't believe her/him. Besides, even if s/he didn't, it's still her/his fault my mom's
163 dead. If Olson hadn't fired my mom, we'd still be living in our little apartment, and she'd still be
164 alive. Even if Olson's not found guilty, I might bring some type of lawsuit if I can find a lawyer; I
165 want her/him to pay for ruining our lives.

Witness Addendum

I have reviewed this statement, and I have nothing of significance to add.

The material facts are true and correct.

DATE March 22, 2005

SIGNED

Dani Jameson

Dani Jameson

Signed and Sworn to before me

Loida Ingrid Vega

Loida Ingrid Vega, Notary Public
Commonwealth of Pennsylvania

My commission expires: **November 18, 2006**

STATEMENT OF SANDY WILBUR

1 My name is Sandy Wilbur, and I'm 28 years old. I work for Prime Cuts Meat Company in
2 Barrister, where I started as a cashier right after high school. When my boss sent me to temp in
3 the payroll department, I saw what a lot of the other employees earned. Drivers have the best
4 job, because they get to do different things and see different people everyday. And, they also
5 make good money. I wanted to stay with Prime Cuts because it's a great company, and they
6 treat their employees well. So, each time there was an opening for a driver, I applied.
7 Eventually I got hired, thanks in large part to a recommendation from Teaberry Olson. S/He's
8 the owner of a local restaurant, and, thanks to my brother, Tee hired me to work one summer
9 for her/him when I was in high school.

10
11 Back then, Tee owned a small, neighborhood grocery and I was her/his delivery driver. S/He
12 really gave me a break one time when I had a lapse in judgment and drank some root beer
13 schnapps while I was out making deliveries. The cops pulled me over and took me back to the
14 store. Tee told the cops s/he had given me root beer barrels candy and that's why I smelled of
15 root beer. They let me off. Tee and the owner of Prime Cuts were friends, and they have done
16 a lot of business together over the years. When I used Tee as a reference, s/he didn't reveal
17 anything about the drinking incident. S/He said everyone deserves a second chance, and I'm
18 really glad s/he gave me a good recommendation. If the people at Prime Cuts even suspected I
19 had been caught drinking and driving, there's no way they would have let me become a driver. I
20 think, even all these years later, if they knew, I'd lose my job for sure.

21
22 I've done well as a driver. I don't have one of those special hauling licenses where you to have
23 to learn about loading bridges, vertical clearance and self-propelled weight limits. And, I'm sure
24 not qualified to drive for TMI, but hauling radioactive waste down the turnpike isn't exactly my
25 idea of a great career move, anyway. So, I've just taken a few safe-driving courses, and
26 attended some driver safety seminars. I'm also getting into safety-related volunteer activities.
27 For instance, I joined the PennDOT safe community program. I signed up to be part of the
28 Citizen Involvement and Input section. I don't know a lot about the program yet, but with the
29 safe community project, area leaders, advocates and concerned citizens take a role in planning
30 and implementing a self-improvement program. It's supposed to help the community's overall
31 quality of life by controlling injuries. I don't exactly know what all is involved because I haven't
32 actually had time to go to the training, but I am signed up.

33
34 My record as a Prime Cuts driver is spotless. I drive all around the city and the surrounding
35 counties, and even with all the construction, I've never even had a close call. I've worked my
36 way up in the company, so now I have a really good route where I like all my customers. I eat at
37 several of the restaurants or have coffee sometimes, and none of the owners ever let me pay,
38 Olson included. That shows the customers are happy with the product and with me. I only have
39 a high school diploma and a few night classes, and those driver safety courses I've taken, but I
40 make a decent living, and I have full benefits, which is more than I can say for a lot of those
41 people I see hanging around my delivery area in downtown Barrister. I deliver to a lot of
42 businesses, and several of the managers have mentioned they're concerned about the number
43 of homeless people on the streets. They say the homeless people hassle passersby, looking
44 for a handout. That's why they started some action group to pressure the city to move the
45 shelters and other service providers away from the downtown area. I know not all homeless
46 people choose that life, but seems like a lot are just lazy.

47

48 Take that Terese Jameson who worked for Tee. I learned recently that she was a homeless
49 person, which explains a few things. Although, I can't believe she was hired at the café at all,
50 she was lucky to have a steady job working for a reputable business. I guess that wasn't
51 incentive enough for her, because she just wouldn't come to work on time. That's why Tee
52 finally fired her, and based on my observations, I don't blame Tee. I'm serious. On several
53 different days that summer and fall when I was delivering to the Terrible Towel, Terese would
54 come rushing in late. I deliver there three times a week, so I don't remember the exact days,
55 but they had to be Tuesdays, Thursdays or Saturdays. Anyway, I just know it happened a lot,
56 because I saw it. She was usually only 15 or 20 minutes late, but in a restaurant, that can make
57 a big difference. Sometimes she was even later than that, and I heard Tee let her have it
58 several times about her tardiness. You see, it created a huge problem for Tee because s/he
59 made all the hamburger patties her/himself. Several of my other customers use the pre-mades
60 or even the frozen, but not Tee. S/He made them her/himself every day. Tee orders more
61 ground beef than any other restaurant that I deliver to.
62

63 So back to November 20th, when they supposedly got into a fight. I had finished unloading the
64 meat, and as usual Tee offered me coffee, which I accepted. We were talking, and then Terese
65 Jameson walked in, about 9 a.m. At the time, I didn't know why she was there, and she didn't
66 even speak to me. She and Tee went to the back. About ten minutes later, Tee came back out
67 to the counter and asked me to go to the back, so I could get my delivery sheet signed. S/He
68 said that Terese had come to the café to try to get her old job back. Tee had refused and had
69 shown her out the back door. If Tee had screamed and yelled at Terese, I would have
70 understood. After all, she had been a totally unreliable employee. I thought it was pretty over
71 the top for her to come around thinking she could get her job back. Anyway, I was sitting right
72 at the counter, and I didn't hear any shouting or angry conversations between them. Frankly,
73 none of it was any of my business, anyway, and I was worried about getting behind schedule on
74 my deliveries. I'm trying to maintain my excellent record at Prime Cuts and having their meat
75 deliveries on time is one of the things my customers really care about. So, I got my copy of the
76 delivery receipt, thanked Tee for the coffee and went out through the back door into the alley.
77

78 I walked to where my truck was parked. As I unlocked the driver's door, I heard some loud
79 talking and laughing. I looked up the alley, and at the dumpster near the Terrible Towel Cafe
80 was a group of teen-aged boys, five or six I'd say. I couldn't see faces since they were all
81 wearing hoodies pulled down over their heads. They were all gathered around the open lid
82 looking inside. When they saw me, they slammed the lid shut and scattered. I'd read in the
83 paper about a gang that was hanging out downtown for the express purpose of "cleaning up the
84 neighborhood," and I sometimes saw them during my downtown deliveries. They were looking
85 for homeless people to roust them out and get them moving. There were lots of articles in the
86 papers about how the homeless shelters impacted the other people who lived and worked in the
87 area. I know that sometimes gangs get out of hand, because there were beatings, and now the
88 police department has even put cops on the street in the neighborhood. I assumed the teens by
89 the dumpster were from the downtown gang, so I got into my truck and drove off. I must have
90 left before the cop looked in the dumpster because I didn't know anything about the murder until
91 I saw it on the news.
92

93 I can't believe that Tee is charged with murder. Oh, I've heard her/him talk about the homeless
94 problem, and I know s/he thinks it's having a really bad impact on the café's business, but s/he
95 wouldn't kill somebody over that. I also know that they're saying the reason Tee supposedly did
96 it was to keep Terese from going to the health authorities. She was claiming the Terrible Towel
97 was supplementing their famous all-beef burgers with horsemeat. That's ridiculous. I've been

98 delivering to that store for over six years, and there's no way that was going on. Believe me, if
99 I'd had any suspicions about that, I would have reported it immediately. To begin with, I would
100 never have anything to do with breaking the law. I don't even get parking tickets. The other
101 thing is if I were caught participating in a horsemeat scam, I'd lose my job in a heartbeat. But,
102 also I wouldn't get involved in anything where cruelty to animals was involved. I love horses. I
103 mean I don't really know anything about horses, but I love them because they're beautiful
104 animals.

105
106 That's one of the things my brother and I really disagree about. He works at a dog food factory,
107 in Barrister County, and they use lots of horsemeat there. He says the dogs that get their
108 company's food are really lucky, because horsemeat is considered a delicacy in other countries,
109 and it's hard to tell it from beef. There have been rumors that their employees have sold
110 horsemeat to some of the restaurant owners in Barrister, but I don't know if that's really true. I
111 guess if you were willing to risk it, it would be one way to really cut costs. Our prime extra-lean
112 ground sirloin usually sells for \$2.49 a pound wholesale. For years, horsemeat sold for about
113 \$.40 to \$.50 a pound. But with the mad cow disease scare in Europe, demand for horsemeat is
114 way up, so the price has gone up, too. Right now, I think, it's up to about \$.75 a pound, and you
115 could probably get it for less if you knew someone to buy it from. Even so, it's about a third the
116 cost of beef, but you'd have to sell a lot of beef to make it worth the risk, I think.

117
118 Anyway, I love all animals. I support several animal rights and care-giving organizations like the
119 World Wildlife Fund, the English Springer Spaniel Rescue Coalition and so on. I know. I know.
120 I'm singing two different songs here. I love animals, and I work for a company that makes its
121 money from selling dead animal products – namely cows. Maybe that makes me a hypocrite,
122 but I swear I don't know anything about horsemeat at the Terrible Towel.

Witness Addendum

I have reviewed this statement, and I have nothing of significance to add.

The material facts are true and correct.

DATE **MARCH 22, 2005**

SIGNED

Sandy Wilbur

Sandy Wilbur

Signed and Sworn to before me

Loida Ingrid Vega

Loida Ingrid Vega, Notary Public

Commonwealth of Pennsylvania

My commission expires: **November 18, 2006**

STATEMENT OF TEABERRY OLSON

1 My name is Teaberry Olson. My friends call me Tee. I'm the owner of the Terrible Towel Café.
2 I've run the café for about 12 years now. It's just a small restaurant. We have only ten four-top
3 tables, but we are jammed at lunch and dinner, and we do a pretty steady business the rest of
4 the time. Although we have some other items on our menu, we're famous for our half-pound,
5 all-beef burgers, and I bet we sell more of them than nearly any other place in Barrister. You
6 can't believe all the beef we buy. We're open for lunch and dinner, Monday through Saturday.
7 We open for business at 11:00 a.m. and close at 8 p.m. weekdays and 11 p.m. Fridays and
8 Saturdays. I usually get in around 5:30 – 6:00 a.m. to accept food deliveries and to make the
9 hamburger patties. Produce is delivered Mondays, Wednesdays and Fridays, and meat is
10 delivered on Tuesdays, Thursdays and Saturdays. I like to be the person who accepts the
11 deliveries, so I can inspect the food and make sure it's the freshest available. It makes for a
12 long day, and sometimes I wish I could trust my employees to do more of the work, but I just
13 can't. On occasion, I have allowed one or two of them to receive the produce, but the meat?
14 No way.

15
16 The first time I met Terese Jameson was when she applied for a job at the café. I ended up
17 hiring her, but now I really wish I hadn't. It's not just that her murder is being blamed on me. I
18 really bent over backwards to be cooperative when I hired her. For some reason, she needed
19 to come in one-half hour late on Saturdays - something to do with her kid. In spite of me really
20 trying to help her out, she was a terrible employee. Unreliable as all outdoors, coming to work
21 late every other day. Terese was supposed to be at work by 8:00 a.m. every morning so she
22 could do all the daily prep except make the hamburger patties, which I preferred to do myself. I
23 admit she sometimes got in at 8:00, but more often than not she was late. That meant that, in
24 addition to doing the meat, I'd have to rush around trying to get everything else done.
25 Sometimes she would try to make it up to me by offering to help with the patties. I never let her
26 help with that, though. I told her I didn't need her hanging around the kitchen – I needed her out
27 on the floor doing the tables or cleaning the grill or getting the deep fryer ready.

28
29 I repeatedly talked with her and explained the importance of her being on time for work, but she
30 didn't seem to care. It was like talking to a brick wall. She kept showing up late, and I really
31 gave her chance after chance. I believe in giving people second chances. We all make
32 mistakes, but enough was enough. We don't have a time clock at the café, so I just started
33 writing down her arrival times on my calendar. Once it was down in black and white, I had proof
34 about her continual tardiness. I had no choice but to fire her. That was on October 29, 2004.
35 She came into work on that day, late as usual. I was furious because it was a Friday, and we're
36 always so busy going into the weekend. When I told her I was letting her go, she got really
37 snippy with me. She said I was being unreasonable and that I should give her another chance.
38 As I said, though, I had given her plenty of chances, and there was no way I was going to
39 change my mind. I remember Terese saying if I didn't let her keep her job, she would be
40 evicted from her apartment and have to live on the street. I didn't believe her. People will say
41 anything to keep a job. After that brat kid of hers made a threatening remark to me, though, I
42 realized what she had been saying was true. It was like a light coming on for me. No wonder
43 she was so unreliable. There's a reason she's homeless.

44
45 Anyway, the kid blamed me. On a couple of occasions after I fired Terese, I ran into her child
46 .Dani, who was furious with me. S/He even threatened to make me "pay for it." In a way I felt
47 sorry for them, but I wasn't responsible for their situation. I gave her a job, and she screwed up.
48 If I had known their history, I would never have hired Terese in the first place. It's not my fault

49 Terese wasn't doing her job. I'm trying to run a business, and I need employees who are going
50 to show up to work on time. Still, the threat frightened me. That Dani seems like a wild kid, and
51 there's no telling what some of these homeless types will do. After the make me "pay for it"
52 remark, I tried to stay as far away from her/him as possible. That's not easy in this
53 neighborhood, because you see the same people all the time, especially the homeless ones.
54 They're just like bad pennies, popping up again and again. I know now that Terese said I fired
55 her because she confronted me about adding horsemeat to our famous all-beef burgers. That's
56 ridiculous. Terese and I never had a conversation like that, and our burgers are 100% prime
57 extra-lean ground sirloin. Can you imagine what would happen to my reputation and my
58 business if I served horsemeat to my customers?
59

60 Some time after I fired Terese, a Kim Sanchez contacted me. S/He said s/he worked at a
61 shelter where Terese and Dani stayed for a time. S/He was calling to beg me to give Terese
62 her job back. I told Kim I would never rehire Terese because she was so unreliable. As I said,
63 had I known they had been homeless, I would never have given her a job to begin with. I really
64 don't care what kind of personal problems Terese had. A job's a job, and she wasn't doing
65 hers.
66

67 Now, don't get me wrong. It's not as though I didn't like Terese because she was homeless. I
68 wouldn't have had a problem with her, if she had just done her job the way she was supposed
69 to. There's no question Barrister has a serious problem with the homeless, and the situation
70 desperately needs to be cleaned up. Those people hang out in the area around my café and
71 scare away the customers. If the police would just get them out of here, everything would be
72 much better in the neighborhood. I'm not claiming I know where they should go, that's the
73 government's job. But I do know I don't want them hanging around my restaurant. Their
74 presence really lowers our property values.
75

76 The big reason they hang out in the downtown area is that's where the shelters are. Sometimes
77 I even have trouble renting apartments in the building I own near the café because people don't
78 think it's a safe neighborhood when they see all the homeless people on the streets. I don't
79 hate them or anything. I really don't care about them at all. I just wish they'd stay out of the
80 neighborhood where I have to make a living. I started a downtown neighborhood action
81 committee in early 2004, and we've been going to city council meetings to pressure the city into
82 cleaning up the problem, but so far they've refused to do anything. I even started a petition and
83 presented it to the council, but still they took no action.
84

85 And just so you know I'm really not against all poor people, listen to this. I have a low-income
86 tenant named Jean Wade, who rents one of my apartments. I worked night and day at the
87 Terrible Towel to scrape together the money to buy them. Admittedly, they're rundown and I am
88 barely a step ahead of City Hall due to fire code violations. I'm trying to fix them up, and it's
89 taking every spare dime I have, but for the Wades, living in one of them is better than the
90 alternative. They could very well be homeless too, if I hadn't been giving her a break on the rent
91 since she lost her job. I'm not a monster you know. This is a single parent with several kids.
92 She had a full-time job and has really been trying to do her best since her spouse died. I bet
93 Ms. Wade doesn't show up late to work every other day. And, unlike Terese Jameson, Ms.
94 Wade appreciates what I have done for her. She even nominated me for a Community Hero
95 award.
96

97 A couple of weeks after I fired her, Terese came to the café before we opened to talk to me. I
98 was sitting at the counter drinking coffee and talking with Sandy Wilbur, from Prime Cuts Meat

99 Company. I get all my meat from Prime Cuts, and not just because the owner of the company is
100 a good friend of mine. They have the best beef in town, and that's all there is to it. Anyway, I've
101 known Sandy since s/he was in high school. Before I opened the Terrible Towel I owned a little
102 grocery in the 1990s, and Sandy was my delivery person. That grocery was the first business I
103 ever owned, and I still haven't gotten over losing it in that fire in 1997. At least after that I could
104 devote my full time to the Terrible Towel.
105

106 Anyway, about Sandy, I'll never forget the night about nine years ago when the cops showed up
107 at the grocery with her/him in tow. They suspected s/he was driving drunk, while making my
108 deliveries. They wanted to know if I had given her/him liquor from the store. Of course I hadn't,
109 and I was furious with her/him for being so stupid as to drink and drive. I could have been liable
110 if Sandy had gotten into an accident. Just the same, s/he was only a kid, and as I've always
111 said, everyone deserves a second chance. I told the police I would take her/him home, so they
112 gave her/him a written warning instead of taking her/him to the juvenile detention center. A
113 couple of years later, Sandy used me as a reference when s/he applied to be a driver at Prime
114 Cuts. I kept quiet about the drunk driving incident and how irresponsible Sandy has been. I
115 guess s/he really owes me big time for that one.
116

117 So back to the morning when Terese came by the restaurant. It was Saturday, November 20. I
118 had just finished inspecting the meat delivery. She wanted to talk to me about being rehired, if
119 you can believe it, so we went to the back to have a private conversation. When we got into the
120 office, Terese asked me for her job back. Frankly, I was stunned. I told her I couldn't rehire her,
121 even if I wanted to, which I didn't. Aside from her poor performance while she was working for
122 me, I had already hired someone to replace her. The conversation lasted a couple of minutes at
123 the most. I showed her the October calendar again, and reminded her about how many times
124 she had been late. She tried to argue with me and disputed the calendar. S/He was crying and
125 begging for her job back, but I wouldn't change my mind. Finally, s/he asked to leave out the
126 back door that led to the alley, so Sandy wouldn't see her all upset and sobbing, and I let her
127 out.
128

129 I went back out front, and asked Sandy to step into the office, so I could sign the delivery
130 receipt. S/He asked what had happened, and I told her/him that Terese had asked for her job
131 back, that I had said no, and that Terese had gone out the back door. Sandy just shrugged,
132 took her/his receipt copy, thanked me for the coffee and left to go to her/his truck that was
133 parked in the alley. I gathered up a load of trash and went out to the dumpster that's behind my
134 café. I lifted the lid on the dumpster, and then as I looked up, I saw Dani at the end of the alley.
135 As I said, that kid is a loose cannon, and I was a little scared. S/He came running toward me
136 shouting and demanding to know where her/his mother was. I explained that she had left some
137 time ago, and I hurried back into the café and locked the door. I guess I was in such a rush, I
138 dropped the trash on the ground instead of throwing it into the dumpster.
139

140 Right after that Officer D.J. Moats came to the back door of the café and knocked. I opened the
141 door and s/he started asking me questions about Terese. I was pretty wary of Officer Moats.
142 Moats had it in for me ever since I wrote a letter to her/his boss complaining that s/he wasn't
143 doing a good job of keeping the homeless people away from my restaurant. Supposedly, the
144 reason Moats was assigned to this area was to keep all the people in the neighborhood safe, or
145 at least so s/he said to me when I tried to encourage her/him to really work on the homeless
146 problem. It was obvious from her/his attitude that s/he didn't care at all about the business
147 people or any of our customers. All s/he seem concerned with was making sure that the local
148 gangs left the homeless people alone.

149
150 I used to think a lot of the gang members were fairly harmless. Especially that one they call Big
151 Dog. He was Jean Wade's son, and I couldn't imagine someone like her could have a kid who
152 was all that bad. A time or two, I would say sometime in the Spring or Summer of 2004, I
153 noticed them chasing the homeless people away from the café. Frankly, I was grateful. I even
154 gave Big Dog and his boys free lunches occasionally because I appreciated their keeping the
155 sidewalk near my restaurant safe for my customers. It looks like, though, it must have gotten
156 totally out of hand. I mean, it's one thing to chase them down the street. It's another matter
157 entirely to kill one of them and throw her body in a dumpster. And, that must be what
158 happened. If you ask me, all this would have been avoided if Moats had been doing her/his job.
159 If s/he was supposed to be protecting the homeless, why did Big Dog and his boys have the
160 opportunity to kill Terese?

161
162 When Moats came into the café and started asking me questions, I confirmed that Terese was
163 an ex-employee and told her/him that she had been by earlier that morning asking to be rehired.
164 I also let her/him know that after I refused to rehire her, she left through the back door, and that I
165 hadn't seen her since. Officer Moats went out the back door. I guess s/he was trying to figure
166 out where Terese had gone. A little while later, s/he came back into the café and asked me to
167 accompany her/him out to the dumpster. S/He found a dead body in the dumpster, whom I
168 identified as Terese Jameson.

169
170 Officer Moats also asked me at that time about a brick s/he found next to the body. S/He
171 wanted to know whether I had touched it, and I told her/him I didn't think so. Later, I agreed to
172 talk with Moats in early December to clear this up. I waived my rights and all. Moats asked me
173 again about the brick and my prints being on it. I then remembered having thrown it in the trash.
174 The façade on the building is crumbling out back, and sometimes whole bricks just fall off. I
175 threw bricks in the dumpster every few days. Anyway, I told him I did remember touching it, but
176 I had forgotten all about it on November 20 in my rush to get back into the café after seeing how
177 agitated Dani was at the end of the alley. I mean, I was rattled and just left the trash on the
178 ground. How was I supposed to remember touching a brick? Moats still arrested me.
179 Fortunately, I posted bail right away, but still, this has been such a terrible ordeal. Anyway, I
180 knew Moats was out to get me because I complained to her/his boss, but I didn't think s/he'd
181 take it that far.

182
183 I didn't kill Terese Jameson. She was a bad employee, so I fired her. I've fired plenty of people
184 during my years in business. Every employer has, I guess. But, just because I fired Terese
185 doesn't mean I killed her. And I didn't kill Terese because of that silly horsemeat story. I don't
186 know who made up that story, but I never used horsemeat in my food; it would ruin me if I did
187 that. Sandy told me there were rumors at the place where her/his brother worked that some
188 local restaurants were using horsemeat, apparently because it's cheaper than beef. I have no
189 idea what it costs, and I don't care. I'd never consider cutting my burgers with horsemeat. After
190 all, I'd lose every customer I have if I did something like that. Not to mention the fact that I
191 would never get that Community Hero award if it got around Barrister that my famous all-beef
192 green chili cheeseburgers were really part horsemeat.

193
Witness Addendum

I have reviewed this statement, and I have nothing of significance to add. The material facts are true and correct.

DATE MARCH 22, 2005
SIGNED

Teaberry Olson

Teaberry Olson

Signed and Sworn to before me

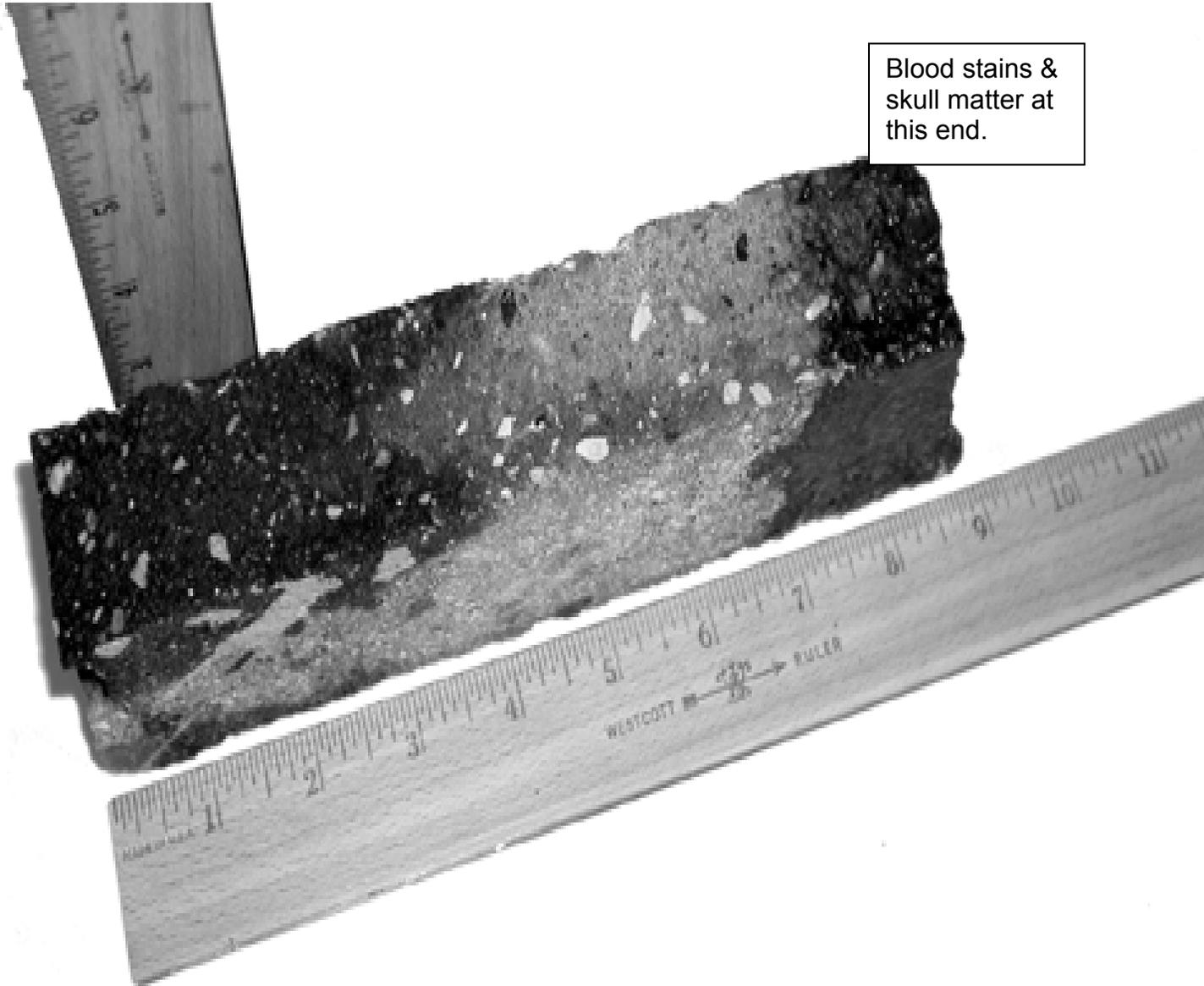
Loida Ingrid Vega

Loida Ingrid Vega, Notary Public, Commonwealth of Pennsylvania, My commission expires:
November 18, 2006

Exhibit List

- Exhibit 1: Photo of a Brick
- Exhibit 2: Citizen Complaint Letter Against Police Officer
- Exhibit 3: Homeless Shelter Incident Report
- Exhibit 4: October 2004 Calendar
- Exhibits 5-1, 5-2, 5-3: Terrible Towel Café Quarterly Invoices
- Exhibit 6: Community Hero Nomination Letter

EXHIBIT 1



Blood stains & skull matter at this end.

EXHIBIT 2

Terrible Towel Café

202 Walnut St.

Barrister, PA 19128

Phone: 999-555-2844

Fax: 999-555-2843

Email: allbeefTTC@yahoo.com

October 11, 2004

Barrister City Police Chief
1900 Cecil B. Moore Ave.
Barrister, Pennsylvania 19128

Re: Officer D.J. Moats

Dear Chief Schneider:

I am writing this letter to make a formal complaint against Officer D.J. Moats, the police officer responsible for patrolling the downtown neighborhood near my establishment, the Terrible Towel Café. As you are probably aware, numerous homeless individuals live out on the city streets and many have taken up residence in my neighborhood. Despite frequent requests by me and other residents, Officer Moats has refused to move the homeless out of our neighborhood. In addition, there has been a recent growth in gang activity in the area. These thugs oftentimes rob the homeless. In fact, I think they do a better job in getting rid of the homeless than Officer Moats.

Officer Moats is assigned to protecting the safety and property of those living in this neighborhood. S/He is not doing her/his job, and I would appreciate it if you would sit down and discuss this with her/him. If Officer Moats continues to be unwilling to protect those who pay taxes, I demand that you convene an oversight committee to investigate this matter.

I would appreciate your written response to my concerns. I am asking that you protect our community and look into whether Officer Moats is performing her/his duties.

Very truly yours,

Tee Olson

Tee Olson

cc: Barrister City Police Officer D.J. Moats

We're famous for our half-pound, all-beef green chile cheeseburgers!

EXHIBIT 3

Circle of Hope

Giving Hope by Lending a Hand to the Homeless

Date: Thursday September 2, 2004

To: File

Submitted By: Kim Sanchez, LSW

Incident Report: Dani Jameson, child of Teresa Jameson
(Resident)

INCIDENT: On Wednesday, September 1, 2004, resident Dani Jameson was caught trying to steal money from petty cash. The money box is kept in the front office and usually contains approximately \$150.00. These funds are used for emergencies.

I observed Dani leaving the front office, and when I confronted and searched Dani, I found \$30.00 in cash. Dani claimed s/he found the money outside. I called the police, and during a subsequent search, they found pepper spray and a nail file on Dani. Weapons of any kind are not allowed at Circle of Hope. At the time of the incident, we did not have a completely accurate account of the money in the box, and, therefore, the officer told us we could not prove Dani had stolen the money.

This was Dani Jameson's second offense, the first being the day before (August 31) when Dani was involved in a fight right outside Circle of Hope. The fight was with a local gang member. I observed Dani kicking the gang member when he was already on the ground. I observed Dani yell threats at the gang member I knew as Big Dog. Big Dog countered with his own threats against Dani and Dani's mother.

As a result of these two incidents, I was instructed by the shelter director to advise Dani's mother, Teresa Jameson, that if Dani committed another violation of shelter rules, they would be evicted and sent to another shelter, and that if that shelter could not take them, Dani might be placed in foster care. I told Dani and Teresa this and Dani agreed to abide by shelter rules.

Police notified?: Yes [X] No []
Further action needed: Yes [] No [X]

CC: *Teresa Jameson and Dani Jameson (hand delivered)*

EXHIBIT 4

October 2004

| Sunday | Monday | Tuesday | Wednesday | Thursday | Friday | Saturday |
|---------|-----------|------------|-----------|-----------|---------------------------|--------------|
| | | | | | 1 8am-5pm | 2 8:30-7 |
| 3 X | 4 8-5 | 5 T-8-6 | 6 8-6 | 7 8-7 | 8 8-7 | 9 8:30-8 |
| 10 X | 11 8-6 | 12 8-6 | 13 8-6 | 14 8-7 | 15 8-7 9 | 16 8:30-8 |
| 17 X | 18 8-6 | 19 8-6 | 20 8-6 | 21 8-7 | 22 8-7 | 23 8-7 |
| 24 X | 25 8-5 | 26 8-6 | 27 8-6 | 28 8-7 | 29 8-7 | 30 8-7 |
| 31 X | | | | | | |

EXHIBIT 5-1

PRIME CUTS MEAT COMPANY
"We'll Cut You a Prime Deal!"
829 Benton Road
Barrister PA, 19128
999-555-0314

Quarter: 2nd - April - June 2004 Invoice No.: 04-572

Business Name: Terrible Towel Café Account # SS100

Address: 202 Walnut Street, Barrister Phone: 999-555-2844

Payment Due: June 15, 2004

Orders Placed By: Teaberry Olson

| Item | Quantity | Unit Price | Total Price |
|---------------------------------|----------|------------|---------------------|
| Premium ground beef – PB400 | 1600 lbs | 2.49/lb | \$3,984.00 |
| Sirloin steaks @ 12 oz. – SS300 | 550 | 7.49/ea. | \$4,119.50 |
| Chicken breasts @ 8 oz. – CB210 | 850 | 2.29/ea. | \$1,946.50 |
| Pork chops @ 6 ox. – PC102 | 420 | 2.98/ea. | \$1,251.60 |
| | | | |
| | | | |
| TOTAL DUE | | | \$ 11,301.60 |

Delivery Person: S. Wilbur

INVOICE

EXHIBIT 5-2

PRIME CUTS MEAT COMPANY
"We'll Cut You a Prime Deal!"
829 Benton Road
Barrister PA, 19128
999-555-0314

Quarter: 3rd - July - Sept 2004 Invoice No: 04-1022

Business Name: Terrible Towel Café Account # SS100

Address: 202 Walnut Street, Barrister Phone: 999-555-2844

Payment Due: Sept. 15, 2004

Orders Placed By: Teaberry Olson

| Item | Quantity | Unit Price | Total Price |
|---------------------------------|----------|------------|---------------------|
| Premium ground beef – PB400 | 1450 lbs | 2.59/lb | \$3,755.50 |
| Sirloin steaks @ 12 oz. – SS300 | 530 | 7.49/ea. | \$3,969.70 |
| Chicken breasts @ 8 oz. – CB210 | 900 | 2.29/ea. | \$2,061.00 |
| Pork chops @ 6 ox. – PC102 | 440 | 2.98/ea. | \$1,311.20 |
| | | | |
| | | | |
| TOTAL DUE | | | \$ 11,097.40 |

Delivery Person: S. Wilbur

INVOICE

EXHIBIT 5-3

PRIME CUTS MEAT COMPANY
"We'll Cut You a Prime Deal!"
829 Benton Road
Barrister PA, 19128
999-555-0314

Quarter: 4th / Oct – Dec 2004 Invoice No: 04-1572

Business Name: Terrible Towel Café Account # SS100

Address: 202 Walnut Street, Barrister Phone: 999-555-2844

Payment Due: January 15, 2005

Orders Placed By: Teaberry Olson

| Item | Quantity | Unit Price | Total Price |
|---------------------------------|----------|------------|--------------------|
| Premium ground beef – PB400 | 900 lbs | 2.89/lb | \$2,601.00 |
| Sirloin steaks @ 12 oz. – SS300 | 400 | 7.49/ea. | \$2,996.00 |
| Chicken breasts @ 8 oz. – CB210 | 900 | 2.29/ea. | \$2,061.00 |
| Pork chops @ 6 ox. – PC102 | 430 | 2.98/ea. | \$1,281.40 |
| | | | |
| | | | |
| TOTAL DUE | | | \$ 8,939.40 |

Delivery Person: S. Wilbur

INVOICE

EXHIBIT 6

October 1, 2004

Office of the Mayor
Barrister Community Hero Award
Nominating Committee
P.O. Box 999
Barrister, Pennsylvania 19128

Dear Committee Members:

I would like to take this opportunity to nominate Teaberry Olson for the Community Hero Award, which will be presented on December 1, 2004. As all of you must know by now, Ms./Mr. Olson is a respected member of the business community. Her/His restaurant, the Terrible Towel Café, is a landmark in the neighborhood and is a gathering place for many of the residents on a daily basis. In addition, Ms./Mr. Olson owns apartments and, as city officials will tell you, s/he has never been cited for housing violations. In addition, s/he has always treated her/his tenants well. I would like to tell you just one story that has affected me personally, showing Ms./Mr. Olson's generosity for which I am truly grateful.

As you know, when the Phillips Plant closed, many people in this city lost their jobs. Unfortunately, I was one of them and, as a result, had an extremely difficult time paying my rent. When Teaberry Olson realized my situation, s/he, out of the goodness of her/his heart, reduced the amount of my rent for several months. This was extremely important to my family since it prevented us from becoming homeless. I have heard many other stories about Ms./Mr. Olson allowing individuals to stay in her/his apartments with either reduced rent or, for a short time, no rent at all. Many in this community would gladly support this nomination for that reason.

Even if this was all that Teaberry Olson did for the community, s/he would be entitled to the Community Hero Award. There is, however, an additional reason to honor her/him with the award. Ms./Mr. Olson has worked long and hard to find solutions to the homeless problem in the downtown area.

I think that when you consider all of Teaberry Olson's achievements and contributions to this community, you will agree with me that s/he is the only individual who should be given the Community Hero Award this year. I hope you will consider my nomination of Teaberry Olson.

Very truly yours,

Jean Wade