

IN THE COURT OF COMMON PLEAS FOR FRANKLIN COUNTY, OHIO
CRIMINAL DIVISION

STATE OF OHIO	:	Case No: 2023 CR 4583
Plaintiff,	:	Judge KIM BROWN
vs.	:	
CHANCE DONOHOE	:	
Defendant.	:	

SENTENCING MEMORANDUM

Now comes Counsel for Defendant *Chance Donohoe* and respectfully submits this sentencing memorandum for the Court’s consideration. On July10, 2024, Mr. Donohoe entered his guilty pleas to Count 2, Aggravated Murder, O.R.C. §2903.01 and Count 6, Abuse of a Corpse, O.R.C. §2927.01. He is currently scheduled for sentencing on August 8, 2024, at 9:00 a.m.

Preliminarily, Counsel emphatically suggests to the Court, to the State and to the victim’s family, that nothing contained in this memorandum is intended to downplay the severity of the offenses or to in anyway minimize Mr. Donohoe’s conduct that brings him before the Court.

With some limitations, the end result remains – the sentence that Mr. Donohoe *will* serve is for all intent and purposes, a sentence of life in prison. The only existing issue is - *with exemplary institutional conduct*, will he possibly ever have a chance to re-enter society and begin living and contributing as a productive and goal-oriented citizen? While the opportunities before the parole board may well be remote, objectively speaking, a sentence that provides for the possibility of some day re-entering society may be appropriate for several reasons.

Arguably, a sentence of 20 to Life meets the principles of sentencing since the sentence is one of “life” and it is highly improbable that the Ohio Parole Board would even consider release at the first available opportunity. The defense would suggest that with consideration given to Mr. Donohoe’s mental health issues and history, drug addiction and the fact that he has no prior record of violence, such a sentence will fully protect the public. Such a sentence would further provide great incentive for Mr. Donohoe to immerse himself in all available programming and counseling in order to redeem himself to the fullest extent possible. The defense acknowledges that the state may view a longer sentence to be appropriate. Identifying the appropriate sentence in any given case is difficult when sentencing factors are fairly considered.

With all considered the defense requests that the Court not exceed a sentence of 30 to Life. Statutorily speaking, the minimum sentence that can be imposed in this case is a sentence of 20 years to life imprisonment.

The facts of this case are admittedly troubling. They are difficult to internalize and to an extent, they are difficult to comprehend. Taking a young man of 27 years, who has no prior record of violence and attempting to reconcile that history with the events of August 29, 2023, is rationally impossible. That rational impossibility does permit, however, an understanding, or recognition, that such events for someone like Chance, could only occur as a result of severe mental health issues and rampant drug addiction. While drug addiction and mental health issues generally do not excuse criminal conduct, drug addiction and more importantly mental health issues are strong mitigating factors; factors that the defense hopes this Court will consider when determining and pronouncing sentence.

Since the Court and the state are aware of the facts, the defense will not repeat them here.

The facts as stated in the PSI are materially accurate. Mr. Donohoe offers no excuses. He has accepted full responsibility for his actions and the commentary within this memorandum should not be interpreted as an effort to excuse the occurrences that have resulted in the indictment and plea. However, every case regardless of facts and circumstances, contains some explanation that pertains to the mental and emotional state of the individual that comes before the court for sentencing.

Counsel would note for the Court that this is not a case where a defendant denies his conduct and then, at the 11th hour, decides to accept responsibility. Chance immediately took steps to turn himself in, admitted his conduct without reservation, and he cooperated fully with law enforcement. There is a reason Counsel believes this is critical in consideration of fashioning a sentence for Mr. Donohoe. There are true hardened criminals in society and there are those who do not possess the constant criminal intent or mindset that drives unlawful conduct or criminal behavior. Chance is a young man who does and has suffered from significant mental health issues. In fact, his mental health issues are well-known. Chance suffers from bi-polar disorder, schizophrenia, PTSD, ADHD, and Major Depressive Disorder. (PSI at pg. 7, 13, Exhibit A, *Letter from Chance's mother, Ashley Radca*).

At the time of the incident, Chance was under the influence of marijuana, methamphetamine, and cocaine, and he had consumed a significant amount of alcohol. (PSI at pg. 7). Chance used drugs regularly and on average, four (4) times per week. His drugs of choice were Ketamine and Cocaine.

When considering his mental health issues, and drug use and then recognizing his complete cooperation from the inception, the suggestion that this is a troubled young man versus

and evil individual, gains credibility. As the PSI and investigative narratives detail, Chance called law enforcement on the date of the offenses and met with officers at *Sheetz* in Powell, Ohio, to turn himself in. His initial interview with police tracks the facts and matches law enforcement's assessment of the offenses. Such candor and acceptance on the part of a young man that engaged in such conduct reflects a young man who possesses a recognition of right, wrong and accountability. While the nature of the offense is beyond troubling, assessing the crimes, the defendant, and the totality of circumstances, suggests that Chance is a good person who, as a result of his mental health issues, and drug issues, did something that he was never predisposed to doing. The defense has attached a letter, separated as Exhibit C, from Chance's former girlfriend, Kiara Wakeham. Her sentiments and depiction of Chance, as a friend and boyfriend, are supportive of what Counsel hopes the Court will consider – that Chance is a good young man, who but for mental health issues and drug addiction, would have never acted in the manner he did on August 29, 2023.

Chance's issues have predated the offenses. Chance has suffered from suicidal ideations and had attempted suicide at the ages of 16, 19 and 21. (PSI at pg. 13, Exhibit A).

The core of who Chance really is as a human being is well reflected in the letters of support included herein. While the defense could submit dozens of letters from those who can attest to Chance's qualities as a young man, so to not overburden the Court, only a few are submitted. Those who best know Chance describe him as a kind, loving and humble young man, with a great personality. (See, Exhibit B, *Letters*). Exhibit A, the letter from Chance's mom, is painful to read. She was a young mother when Chance was born, and Chance's biological father was absent from his life. She describes how Chance was in and out of counseling since the age of

five and through high school and beyond. That a child would have to begin counseling at such an early age is difficult to comprehend. Chance's mother did the best job she could, but even in a single parent household, a father figure is critical to any young man's development. While the defense does not intend to excuse or minimize any criminal conduct, courts are required to look at a defendant and consider their circumstances, and in this regard the defense requests the Court consider the circumstances under which Chance was raised; not just as to his mental health issues and drug dependency, but also, detrimentally, without a father.

Under the facts and circumstances of this case, a sentence of Life with Parole Eligibility at 20 years, would not be contrary to the principles of sentencing, nor would it demean the seriousness of the offenses. Realistically, such a sentence would not automatically result in Chance's release after serving twenty (20) years of incarceration. The Parole Board's common practice is to extend periods of incarceration well past the date of first eligibility for release. Five and ten year "flops" are the norm. Multiple rejections even in cases where a sentence is stated as "15 to Life", are routine.

Other than the current and instant cases, Mr. Donohoe does not have any juvenile or adult record reflecting predisposition to violence. Respectfully, notwithstanding the heinous nature of the crimes, Chance is amenable to *someday* returning to society and being a productive member of the community.

While Chance has acknowledged his wrongdoing, the defense requests that the Court consider that he has been addicted to drugs for several years. Needless to say, his addiction has negatively impacted his life. Unfortunately, for many, such as Chance, the addiction or use, oftentimes leads one to view drug use as purely recreational, thereby diminishing the reality of

the harm that drugs can, and in many cases do, cause. The long-term effect of drug addiction and the impact of how that drug use contributes to forming one's perceptions as they progress into adulthood oftentimes go unappreciated. Chance's trajectory, from the time he was five, and before, coupled with his later drug use and developing mental health issues, may not be excusable, but it is understandable. Fortunately, his mental health issues and drug addiction are two very treatable illnesses.

Identifying his issues and accepting responsibility for his actions are two of the most important aspects of rehabilitation. Chance has done both.

The overriding purposes of felony sentencing are to protect the public from future crime by the offender and others, to punish the offender, and to promote the effective *rehabilitation* of the offender using the minimum sanctions that the court determines accomplish those purposes without imposing an unnecessary burden on state or local government resources. To achieve those purposes, the sentencing court shall consider the need for incapacitating the offender, deterring the offender and others from future crime, *rehabilitating the offender*, and making restitution to the victim of the offense, the public, or both. O.R.C. §2929.11(A).

A sentence of 20 or 30 years to Life will not demean the seriousness of the offenses. Punishment is relative and for Chance, now facing what will inevitably be a very lengthy prison term, any sentence, even one allowing for the possibility of one day obtaining release through the parole system, is already devastating.

Chance will avail himself to all programming within the Ohio Department of Rehabilitation and Corrections ("ODRC"). His rehabilitation and programming will be impacted by the ultimate sentence he receives. Individuals who are incarcerated in Ohio are limited in

terms of programming and those limitations are related to that individual's sentence. "Lifers" or those who are to serve "Life without Parole" are, generally speaking, tracked in programming that helps them to adjust to the reality of a "never to be released" sentence. Their adaptation to the rigors of permanent imprisonment and the inherent stressors associated with such a sentence are the primary focus of the "educational programming" that is made available. While having some purpose, and being in some cases trained to assist other similarly situated inmates, provides some level of motivation, the realities of institutional life and rehabilitation, within the context of programming, are directly related to an inmate's future possibilities.

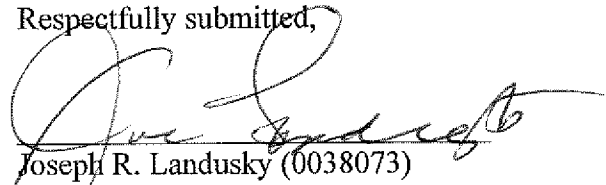
With a sentence that allows for the possibility of parole, Chance will have greater options when it comes time to signing-up for specific classes and programs. Most programs in ODRC have a waiting list and those lists are related to the potential outdate that an individual *may* meet. While a potential future release date will forever be unknown to Chance, the prospects of possible release will certainly have him encouraged to participate, prove himself and establish himself, so as to someday hopefully re-enter society with a full appreciation of whatever life he may have left while continuing to appreciate and accept the everlasting effects of his personal actions that led to his incarceration. A *Life without Parole* sentence will, literally, stifle much of any positive outlook and goal-oriented approach to rehabilitation that Chance may potentially develop.

Chance apologizes for his actions and his recognition of his conduct and his cooperation from the inception support his personal remorse for his actions. The English language today does not have the words that accurately express Chance's pain and heartache. Chance recognizes the pain brought upon Shannon, her family and his own family. While many may not understand,

Chance is currently living with the loss of someone he loves. He will live with the realities of this case and his actions every single day and for the remainder of his life, in or out of prison. Given the opportunity, Chance will hopefully one day, return to society and begin contributing as a productive citizen, who will forever remember the events of August 29, 2023.

Chance and his family appreciate the Court's consideration.

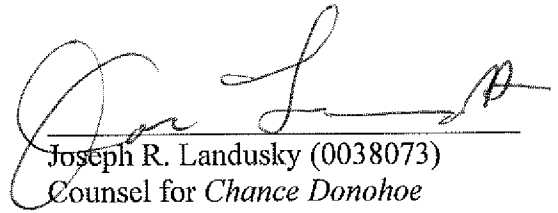
Respectfully submitted,



Joseph R. Landusky (0038073)
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Sentencing Memorandum was served upon Daniel Lenert and Melissa Killworth, Assistant Franklin County Prosecutors, 373 S. High Street, Columbus, Ohio 43215 on this ____ day of August, 2024 by Regular U.S. Mail or electronically to: dlenert@franklincountyohio.gov and mkillworth@franklincountyohio.gov.



Joseph R. Landusky (0038073)
Counsel for *Chance Donohoe*

EXHIBIT A

August 3rd, 2024

Dear Judge Kim Brown,

My name is Ashley Radca, and I am the mother of Chance Donohoe, who murdered Shannon Hiott on August 29th, 2023. On that day, many lives changed forever. I am deeply saddened by the pain that my son caused many people.

I want to express my deep sympathy and sorrow to Shannon's family and friends. Chance was raised to learn that violence is not the answer and that instead of lashing out and hurting others during difficult times, we should take the high road, leave people alone, and continue to move forward in life, no matter what.

Chance has had many struggles in life. I was a young mom, and his biological father was not present. He struggled in school and socially as a child. He was in and out of counseling from around the age of five years old, through high school and into adulthood. Every male role model in Chance's life has let him down. Although I have always been consistent in his life and have loved him unconditionally, and we were closely bonded, I was not equipped to help Chance with his immense struggles, especially at such a young age. This was not for a lack of trying.

In adulthood, Chance job-hopped and did not seem to stay in one living situation for long. He began using drugs and was suicidal. Chance went to rehab at the age of 21 for use of methamphetamine. Although I was truly at a loss for how to help my son, we remained close and carried a strong bond throughout all his struggles. I desperately wanted to help him and see him turn into the young man that I knew he was capable of becoming. Chance is intelligent, caring, and fun, and he wants to succeed and do the right thing. He did not know how to bring forth his strengths and overcome his burdens to create a better life.

In the summer of 2022, Chance's (now) 8-year-old brother and I moved back to the Columbus area from living on our family property about two hours away. We were excited to live much closer to one another again. Shortly after, Chance moved in with Shannon. Chance and I were never more distant than we were during the time he lived with Shannon until he moved back home just nine days before all of this happened. I was very relieved he was back home with his little brother and me. I felt like I finally got my son back. I knew he was not well for many reasons, but he was home, talking and opening up to me again, and I thought we had time to help him figure out how to move forward and get the help he needed.

I could see that Chance was struggling with the breakup, the hold that Shannon seemed to have on him, his mistakes, and the things being shared about Chance and his family on social media. We discussed in depth how to move forward, have a fresh start, and focus on his growth and healing. Chance secured a new job close to home and was supposed to begin on August 29th, 2023, the same day this happened. Chance was

experiencing a very difficult time in life, but from my perspective, he was making plans and taking some positive steps. Above all, he was home and openly talking to me. I truly felt that he needed to be back with his family at that point in his life.

I will never fully understand how my son was capable of doing the horrific things he did the night he ended Shannon's life. It was so entirely out of character and not like anything he had ever done in the past. I am not sure what happened to Chance that night, but I do think it was a mixture of being unmedicated, mental health issues, drug use, a toxic relationship, and a feeling of desperation and despair. This is in no way an attempt to justify Chance's actions. What he did was beyond terrible, and he must pay a consequence for his actions. For a long time, I have been worried that Chance may hurt himself, but I was never afraid that he may hurt someone else. If I felt that way, I would not have been able to allow Chance to live with me and his (then) 7-year-old brother.

Several days after Chance was arrested, I hired Dr. John Tilley to do a psychological evaluation on him. Like everyone else in this situation, I seek to understand something that we will never fully have answers to. I know that Chance does not even really understand why he did that. I also wanted Chance to be evaluated so that he could be properly diagnosed and medicated.

Dr. Tilley's provisional diagnosis was that Chance has depression and an underlying mood instability, as well as a lengthy history of substance abuse, probably due to self-medicating. Chance was using methamphetamine around the time of the incident, and he was unmedicated. Chance did this under a specific circumstance that existed on that day. The person who did those actions is not the person that Chance is today or who he will be forever. Chance did monstrous things – but he is not a monster.

Chance is adjusting well to being in a corrections facility. He is on medication and away from drugs and appears to be stable now. His mental clarity, emotional strength, and calmness are all very apparent. It inspires me to keep going. Chance talks about how whatever happens with his sentence is meant to happen; he is prepared to face the consequences of his actions and says that he will get through it. I reassure him that yes – we will get through this and stay together as a family. He looks forward to attending school in prison, working, and helping others.

I think of Shannon and her family often. I think of all the ways one small change that night or leading up to that night could have created an entirely different outcome. I understand where Shannon's family and friends come from – they want justice served in this situation.

What my son did that night to Shannon, before, during, and after the incident – leaves me speechless. I did not know I could love someone who could do such terrible things. But I do. I love Chance, and I know that he is not evil. His heart is good despite his atrocious actions. Chance is not what he did. He is still a human, a son, a brother, a friend, a grandson, and a nephew. He loves and is loved. He has been working to gain trust and shows that through consistency, staying sober, and staying out of trouble. He

is in an honor dorm currently and has been in low security for all or much of his time at Jackson Pike and the JAK. He had no violent history prior to this situation, but I absolutely do acknowledge the severity of what he did.

I ask that you please consider allowing Chance to see the parole board someday. We understand that he needs to pay a consequence for his actions and that there may never be a consequence great enough for what he did. I believe that given an opportunity, Chance could one day be a contributing member of society and is a safe person to be around.

Thank you for taking the time to read my letter. It means a lot that you consider Chance, his family, and his friends' perspectives. However, I understand the primary focus is on Shannon and her family and serving justice in this situation.

Sincerely,

Ashley Radca

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Powell, OH 43065

EXHIBIT B

7/25/2024

Dear Judge Kim Brown,

I am writing to you on behalf of someone that is dear to me and my family, Chance Donohoe. His mother and I have been friends since he was a small child, and our children grew up together. In fact, Chance and my son were best friends for many years. He is like part of the family to myself and to my children.

I was shocked to hear of what happened. Having known Chance his whole life, I have only known him to be sweet, funny, caring, and kind. He loved being outside, listening to music, and gathering with friends and family. He has always been a joy to be around, and always grateful for good times with friends and family. When we did things outdoors, he would be especially happy as he loves being out in nature. At one point, Chance even lived with me and my kids in my house. I felt fully comfortable with him in my home and he was so appreciative of everything I would do for him. Watching him grow up was a pleasure as he had grown into such a kind and loving young man. I look back at videos and pictures of him laughing, dancing and being silly and it melts my heart. He is very loved and missed by his family and friends. He has a huge heart and a beautiful personality, he made everything more fun.

I appreciate you taking the time to consider my words.

Sincerely,

Dawn McHale

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Dublin, OH 43016

614.432.6196

dawngirlcbj@icloud.com

**Law Office of the Public Defenders
Montgomery County Ohio**

117 South Main St. 4th Floor
Dayton, OH 45422
(937) 225-4652

The Honorable Judge Kim Brown
345 S High Street 5th Floor
Courtroom 5E
Columbus, OH 43215

July 24, 2024

Dear Judge Kim Brown,

I am writing to you regarding Chance Donohoe and his sentencing. I come to you not only as a lifelong friend of Chance's family but also as an objective person who works within the judicial system with Montgomery Counties Public Defender's Office.

Chance has made some terrible decisions and those decisions have impacted many lives and resulted in the loss of one. However, he has also shown such heartbreaking remorse and was accountable in turning himself in. He has been a loving son, brother and grandson. He is not just the person who committed the terrible crime. He is a person who had at one time so much hope and opportunity.

I ask for you to please give him the opportunity to see a parole board. In doing this you would not only grant justice to the victim's family but also grant hope to his family as well. Chance has an 8-year-old brother who has been devastated by the loss of his brother. For him to have the hopes that one day he may see his brother again even if it is well into adulthood would help him to navigate this horrible situation a little better.

Please be compassionate in your sentencing of Chance. I believe given the opportunity to take advantage of the programs and rehabilitation he will be offered upon incarceration he could become a restored citizen if given the chance.

Thank You,

Stephanie Sanders
Community Resource Specialist
Law Office of the Public Defenders
Montgomery County, Ohio
SanderS@mcohio.org
O: (937) 224-8620
C: (937)581-1769

Dear Judge Kim Brown,

My name is Justin Tully, and I am writing to you today on behalf of Chance Donohoe.

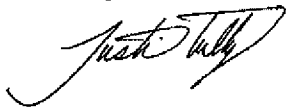
I've known Chance since he was a young boy (5 or 6 years old if I remember correctly), when his mother and I worked together at a family run restaurant in Colorado. He would often come with his stepdad after school and share his afternoon with us there, we all watched him grow in those early years and have remained close friends to this day.

I've seen the roots from which he was raised and have been witness to his growth and development since. Even as our families moved apart in distance, we've remained connected as good friends throughout.

Those roots that still reside at his core are of goodness, reason, humility and love. I am confident those qualities will reforge and show through in him over the course of the correctional program that is now before him. In confronting the reality and impact of this tragedy, both inwardly and outwardly, and committing to remorse and reform, I am confident he will demonstrate worthiness of a second chance.

As you conduct his sentencing, please consider including an option for parole, should my current personal confidence in him be found merited later in the eyes of a review board.

Sincerely,

A handwritten signature in black ink that reads "Justin Tully". The signature is written in a cursive, flowing style.

Justin Tully
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84108
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Kimberly Baney
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kimberlybaney1@yahoo.com

Dear Honorable Judge Brown,

I want to thank you for reading my letter in regards to Chance Donohoe. My name is Kimberly Baney and I have the pleasure of knowing Chance and his family. I do believe that Chance must pay for the crime he has committed, but I would like to advocate for the possibility of parole for him in the future. Prior to writing this letter I researched what indicators for successful rehabilitation for prisoners. I noted that counseling (CBT, Education based programming, etc.) as well as a support group are important indicators that rehabilitation can be successful. I would like to be a part of this part of Chance's rehabilitation and offer support to him and his family. I am committed to sharing therapeutic resources with him and maintaining regular communication. I do believe that after taking responsibility for this crime he could re-enter society as a productive and safe part of the community.

Thank you for your thoughtful consideration.

Sincerely,
Kimberly Baney

7/31/2024

To Judge Kim Brown,

Hello my name is Seth Gray, I reside at 6046 Central College Rd New Albany Ohio. I am the father of Chance's 8-year-old brother and I lived with Chance off and on for approximately 6 years. Chance's mother and I were in a relationship for about 7 years and in that time I grew to know Chance very well, as did my oldest daughter who is Chance's age and the rest of my kids now 22, 18 and 16. They all got along with Chance very well and considered him a brother.

I met Chance when he was 16 and what stood out to me about him more than anything was his love for his mom and the fact that he accepted my kids right away. They all grew close very quickly. Some of my kids' fondest memories stem from holidays and weekends when they were able to spend time with Chance. My youngest son, Chance's brother, adores him and they have a very strong connection with each other. He talks about Chance all of the time and constantly asks when he is going to be able to see and spend time with Chance again.

Chance had some challenges that I believe were a direct result of an absent father and being let down time after time after time. This has to be said. He didn't have the guidance, confidence and direction that every boy looks to their father for. I don't condone anything that has happened and I am deeply saddened for the family of the victim. Chance was never been anything but good to me and my children. He is an extremely loving brother to my youngest and I can only ask that at some point in his payment to society for his transgressions, that he is given an opportunity to live and help others who are going through similar issues in their lives, to make better decisions. This could ultimately save lives. That is the only way, in my opinion, to turn a horrible negative into a shining positive.

I wish nothing but God's healing, peace and blessings to the victim's family.

Seth Gray, D.C.
Certified Electromyographer
Sgray.apex@gmail.com
(614) 205-6905

Your Honor,

There are so many things that I could wish for in this very tragic Life situation. Sad, Tragic, Painful, So painful. I wish that Shannon and her family NEVER would have to experience such loss and pain. My heart goes out to them every day also, every day. But an extra sad part is how people will always remember my Grandson Chance. The person that did that horrible thing was not my grandson. It was not. Something snapped in his brain, and he was no longer in control. Unless we have mental issues also, just crazy thoughts, then we can't empathize. We can all sympathize because we pretty much all have a friend or relative who is troubled mentally.

But what makes me very sad is that you, Your Honor, will never get to know the Chance we all knew. He was sweet and kind, and polite. Hard working. That is the Chance that those of us who have known him most of his life know. I hope you can show Chance some sympathy.

Chance's Grand Pa, That even at his age now would still call me Pa Pa Tom.
Tom Radca. 15216 Grove Rd Port Washington Oh 43837
740 502 4374.

Katie Hynes
7803 Plateau Creek Lane
Littleton, Colorado 80125
719-237-2186

Franklin County Court of Common Pleas
Attn: Judge Kim Brown
345 S. High Street
5th Floor, Courtroom 5E
Columbus, OH 73215

August 2, 2024

Dear Judge Brown,

The purpose of my letter is quite simple. I ask that you view Chance Donohoe as a young man that made extremely poor choices, committed crimes that are unspeakable but also recognize his humanity. I understand that sentences are mandatory for certain offenses and that asking for leniency is not appropriate. I am not asking for you to give Chance anything but grace in sentencing and an opportunity for hope. Although a sentence of life in prison is possible, I am asking that you allow a sliver of hope in the future with the granting of the possibility of parole many years down the road.

I got to know Chance as a child and young teen in Gunnison, Colorado. I understand that he struggled with mental health in his later teen years and was given access to counseling and had the tremendous support of his mother, Ashley. I suppose I am not just asking for grace for Chance but also for his mom and little brother. We all need hope and something to look forward to even if we hurt others or commit crimes. Murder is terrible and never justified in my mind. I am certain that Shannon Hiott's family and friends wish to see that Chance never has a chance to live freely. It is so sad that Ms. Hiott will never experience milestones and experiences in life that have been taken from her. I am not a deeply religious person, but I do have faith in the underlying goodness of all people.

Please allow Chance the opportunity to work on himself in prison and know that not everyone has lost faith in him. I ask that you allow him to see in himself that the expectation is that he is a good person and is not defined by the crimes he committed. I have never known Chance to be violent or aggressive.

Thank you in advance for offering grace in your judgement. Please add the possibility of parole in the sentencing of Chance Donohoe.

Respectfully,

Katie Hynes

EXHIBIT C

To Whom It May Concern:

My name is Kiara Wakeham. I am Chance Radca's previous girlfriend. We dated from 2020-2022 after being friends for around a year. When I first met Chance, I was immediately aware of how bright his light shines. I have never known him to be anything but a kind and gentle human being. Throughout our relationship Chance was never violent and never once treated me badly. He has always been one to stand up for others and a protector of all his friends and those he cares for.

Chance has taught me so much and is absolutely a huge part of the reason I am the person I am today. Knowing him has made me a better person. I understand the meaning of unconditional love because of him. In my communication with him since the events of last August, I see someone who is the healthiest and strongest mentally that I have ever known him to be. He has already begun taking this horrible mistake and learning from it and using it to grow and better himself. I believe he has the capacity to achieve even more progress and enact positive change in the years to come. Not only in himself, but also in those around him. It is my most sincere hope that he be granted the possibility of parole after he has served an appropriate amount of time so that he be able to hug those of us who still love him deeply as a free and changed man.

Thank you for your consideration,

Kiara Wakeham

Kiaranickolee@gmail.com

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