

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

DAVID WILSON,	)	
	)	
Petitioner,	)	
	)	
v.	)	Case No. 1:19-CV-284-RAH-CSC
	)	
GREG LOVELACE, Commissioner,	)	*** DEATH PENALTY CASE ***
	)	
Respondent.	)	

**PETITIONER’S REPLY TO RESPONDENT’S RESPONSE
TO DISCOVERY ORDER (DOC. 157)
AND SIXTH MOTION FOR *BRADY* DISCOVERY**

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**PETITIONER’S REPLY TO RESPONDENT’S RESPONSE TO
DISCOVERY ORDER (DOC. 157)
AND SIXTH MOTION FOR *BRADY* DISCOVERY**

Petitioner David P. Wilson respectfully submits this Reply to Respondent’s Response to the Discovery Order (Doc. 157) and moves this Court for additional *Brady* disclosures. In support of this motion, Petitioner states:

1. On April 6, 2026, this Court entered an order directing Respondent to review certain law enforcement files and produce relevant documents to Petitioner. Doc. 151. In Part B of its order, this Court directed Respondent to turn over to Petitioner the letters and writings seized by Sergeant Tony Luker from Catherine Nicole “Kittie” Corley’s cell at the Houston County Jail in September 2004. *See* Doc. 151, at p. 11-12.

2. On April 8, 2026, Respondent complied with Part B of the Court’s order and produced to Petitioner the letters and writings seized by Sgt. Luker from Kittie Corley’s cell.

3. On May 20, 2026, Respondent emailed undersigned counsel with new discovery productions in compliance with the rest of this Court’s order (Doc. 151). Respondent attached to his email the following:

- a. A 474-page PDF document titled “Bates.pdf” containing writings seized from Kittie Corley, investigative reports, police interrogation transcripts, witness lists, police memoranda, and other textual

documents pertaining to the investigations into the murders of Dewey Walker and C.J. Hatfield. A redacted copy of the 474-page “Bates.pdf” document is attached as Appendix A; it is redacted only to eliminate personal identifiers such as social security numbers, dates of birth, and street addresses, pursuant to Local Rule 5.2 of the Local Rules for the United States District Court of the Middle District of Alabama, as amended on October 1, 2011.

- b. A 20-minute MP3 audio recording of a police interrogation of Heather Lynn Brown on January 29, 2005 in the Houston County Jail. A copy of the MP3 audio file is being filed conventionally with the Court as Appendix B; the official police transcription of the MP3 audio file is contained in the “Bates.pdf” document. *See* Appendix A at Wilson Habeas 0408-0419.
- c. An 80-minute MPEG-4 movie file of a police interrogation of John Edward Parmer conducted on March 3, 2005 in the Houston County Sheriff’s Office. A copy of the movie file is being filed conventionally with the Court as Appendix C; a certified court reporter transcription of the movie recording of the interrogation is attached as Appendix D; it is redacted to eliminate personal identifiers pursuant to Local Rule 5.2.

- d. A 15-minute MP3 audio recording of the second part of a police interrogation of Mark Hammond on February 26, 2005. A copy of the MP3 audio file is being filed conventionally with the Court as Appendix E; the police transcription of the MP3 audio file is contained in the “Bates.pdf” document. *See* Appendix A at Wilson Habeas 0419-0430.
- e. A 35-minute Windows Media Audio recording of a police interrogation of Kittie Corley by Special Agent Vicki Wilson and Assistant Attorney General Richard Anderson of the Alabama Attorney General’s Office on May 2, 2023 at the Birmingham Community-Based Facility. A copy of the Windows Media Audio audio file is being filed conventionally with the Court as Appendix F; the Attorney General transcription of the Windows Media Audio file is contained in the “Bates.pdf” document. *See* Appendix A at Wilson Habeas 0055-0073.
- f. A 27-minute MP3 audio recording of a police interrogation of Kittie Corley by investigator Allen Hendrickson of the Henry County Sheriff’s Office conducted on January 29, 2005. This audio file has been conventionally filed with the Court. *See* Doc. 114-5. The official police transcription of this interrogation is contained in the “Bates.pdf” document. *See* Appendix A at Wilson Habeas 0039-0054.

g. A 32-minute Windows Media Audio file of the interrogation of Kittie Corley by investigator Allen Hendrickson of the Henry County Sheriff's Office and Tommy Merritt of the Alabama Bureau of Investigation conducted on March 24, 2005 in the Houston County jail. This audio file has been conventionally filed with the Court. *See* Doc. 114-7. Although the official police transcription of this interrogation still has not yet been produced by Respondent, a certified court reporter transcription has been filed with the Court. *See* Doc. 114-8.

4. By order dated May 20, 2026, this Court granted Petitioner the opportunity to file a Reply. *See* Doc. 158.

5. A review of the new documents and recordings produced by Respondent on May 20, 2026 reveals that there are additional pieces of relevant material evidence that have not yet been produced, as well as additional law enforcement agency files that need to be reviewed by Respondent. *See infra* Parts II and III.

6. Petitioner accordingly moves for additional *Brady* disclosures pursuant to the legal holding of this Court's order dated April 6, 2026 (Doc. 151) and the Court's two prior orders (Doc. 67 at 11–14; Doc. 79 at 10–14); to the Supreme Court decisions in *Brady v. Maryland*, 373 U.S. 83 (1963) and *Bracy v. Gramley*, 520 U.S. 899 (1997); and to the “good cause” standard of Rule 6 of the Rules Governing

Section 2254 Cases (the “Habeas Rules”). As this Court found previously, Petitioner has good cause to request additional material and relevant discovery.

7. Petitioner also renews his motion for access to the investigative files. *See infra* Part IV. Based on the revelations from the May 20, 2026 production, especially concerning the Corley writing samples that were ordered to be turned over, *see infra* Part IV, Sections A and B, Petitioner requests at a minimum access to the Houston County District Attorney’s files concerning the Walker murder and to the Henry County District Attorney’s files concerning the Hatfield murder.

8. In order to understand what relevant evidence is still missing and needs to be produced by Respondent, it is necessary first to carefully review the material evidence that Respondent just produced on May 20, 2026. Petitioner will proceed with this review in Part I.

I. NEW DOCUMENTS AND RECORDINGS PRODUCED BY RESPONDENT

9. On May 20, 2026, more than 22 years after the initiation of the investigations into the murders of Dewey Walker and C.J. Hatfield, Respondent produced seventeen (17) new pieces of favorable, material, downstream *Brady* evidence that had never before been produced to Petitioner.

10. These 17 pieces of new material evidence are “downstream” or “derivative” evidence insofar as they are evidence about Kittie Corley’s involvement in the Walker and Hatfield murders that defense counsel would have investigated,

discovered, and used had the handwritten confession letter by the codefendant Kittie Corley dated August 10, 2004 (hereinafter the “Corley Letter”) been provided to Petitioner. *See* Doc. 151 at p. 6-8.

11. These 17 new pieces of material downstream evidence substantiate Petitioner’s *Brady* and ineffective assistance of counsel (“IAC”) claims at the guilt phase, penalty phase, and judge sentencing, raised in his first amended federal habeas corpus petition. Doc. 114, Claim I (*Brady* violation at the penalty phase and sentencing); Claim II (IAC at the penalty phase and sentencing); Claim III (*Brady* violation at the guilt phase); and Claim IV (IAC at guilt phase). This evidence also substantiates Petitioner’s claim that he is innocent of capital murder and also innocent of the death penalty. *See* Doc. 114, Claim V.

12. The 17 new pieces of material, downstream *Brady* evidence include:

#1. *The Interrogation of Heather Lynn Brown*

13. Respondent produced to Petitioner on May 20, 2026, for the first time, a police interrogation of Heather Lynn Brown conducted by investigator Allen Hendrickson of the Houston County Sheriff’s Office on January 29, 2005, at the Houston County Jail. *See* Appendix B (MP3 audio file of interrogation filed conventionally with the Court); and Appendix A at Wilson Habeas 0408-0419 (official police transcription of the interrogation).

14. In that interrogation, Heather Lynn Brown, a suspect in the C.J. Hatfield murder, told the police that Kittie Corley had possession of the gun used as the murder weapon in the Hatfield murder and that she maintained it in her lock box in her apartment. *See* Appendix A at Wilson Habeas 0415-0417.

15. Heather Lynn Brown was the girlfriend of James Bailey, who was convicted of the murder of C.J. Hatfield. *See* Appendix A at Wilson Habeas 0400; Doc. 81-18 (ADOC incarceration details for James William Bailey showing murder conviction from Henry County).

16. In the police interrogation that Respondent produced on May 20, 2026, Heather Lynn Brown told the police that Kittie Corley had control of the murder weapon:

Brown: [...] one of the guns Stuckey gave to Bam.¹ Bam had given it back to Mark. And Bam then told his ex-girlfriend who goes by Kitty, it's her nickname not her stage name or anything, get the gun back from Mark it's registered. [...]

Hendrickson: Who put it in the lock box?

Brown: Kitty.

Hendrickson: Lock box where?

Brown: In her apartment. She had like a little safe lock box. [...]

Hendrickson: Okay. What happened to it then?

¹ "Bam," or "Bam Bam," is the nickname for Morris Scott Mathis (often called simply "Scott Mathis"), who was originally charged with murder in the C.J. Hatfield killing and pleaded guilty to hindering prosecution in the first degree on April 13, 2010. *See* Doc. 81-15 at p. 3.

Brown: She got busted and she's in jail now. [...]

Hendrickson: What did she do with the gun?

Brown: She left it in her apartment.

Hendrickson: When did she get busted?

Brown: Um, she's been in here for a little bit.

Hendrickson: What's a little bit?

Brown: A month or so. And she had it up until she was busted. She told me that she was scared because now she's being drug into it.

Hendrickson: So, she's saying she's got one of them?

Brown: She, yeah.

Hendrickson: What's her name?

Brown: I don't know her real name. I can find out but she's scared to death because she see's me in here. [...]

Hendrickson: Whatever happened to the used cartridge shells?

Brown: Mark. I don't know. Mark had those but when Kitty got the gun from Mark. He got it back from.

Hendrickson: Now who's Kitty.

Brown: Kitty is Bam Bam's ex-girlfriend.

Appendix A at Wilson Habeas 0415-0417.

17. This new evidence confirms both the back side of the Corley Letter and Corley's two police interrogations from January 29, 2005, and March 24, 2005. Docs. 114-3; 114-4; 114-5; 114-6; 114-7; 114-8. It confirms Corley's multiple confessions that she had possession of and hid the murder weapon in the Hatfield

murder. *See* Doc. 114 at pp. 110-111. In those confessions, Corley admitted to buying and providing the murder weapon used in the fatal shooting of C.J. Hatfield, identified the exact murder weapon (the “blue-plated type,” “dark color not silver” .38 caliber revolver) which was shown to her (Doc. 114-8 at p. 13), and keeping it in a lock box that she had exclusive access to along with Morris Scott “Bam Bam” Mathis and Mark Hammond. *See* Doc. 114 at pp. 110-111 (comparisons of Corley confessions).

18. This new evidence from Heather Lynn Brown is highly material because, on the front side of the Corley Letter, Corley also confessed to having control of and disposing of the murder weapon, namely the baseball bat, in the Dewey Walker murder. Corley’s connection to the murder weapon in the Hatfield case is thus consistent with the *res gestae* of the Walker murder and Corley’s specific connection to the murder weapon in that case as well.

19. On the front side of the Corley Letter, Corley stated that she brought in the baseball bat (“We took a baseball bat in with us”), took control of the bat to beat Mr. Walker, and then disposed of it (“I threw baseball bat in trash dumpster”). *See* Doc. 114-1 and 114-2.

20. Thus in both homicide cases, Corley is tied to the murder weapon. Had the prosecutor produced the back side of the Corley Letter and Petitioner obtained this downstream evidence, Petitioner could have called Heather Brown at trial as a

witness, possibly an adverse witness, and examined her about her knowledge of Corley's possession of the murder weapon in the Hatfield case. That could have corroborated Petitioner's cross-examination of Sgt. Luker, who was called as a witness by the prosecution at trial, regarding Corley's possession of the murder weapon in the Hatfield case and her claims about possession and disposal of the murder weapon (the baseball bat) in the Walker case. This is information that Petitioner never knew because the prosecutor withheld the back side of the Corley Letter in which Kittie Corley confessed to being involved in the murder of C.J. Hatfield, in violation of *Brady v. Maryland*, 373 U.S. 83 (1963).

#2. *The Vroblick Letter*

21. In the new evidence produced by Respondent on May 20, 2026, there is a letter from Joan Vroblick to Kittie Corley dated August 5, 2004. *See* Appendix A at Wilson Habeas 0088 (hereinafter "the Vroblick Letter"); Appendix G (a transcription of the Vroblick Letter). The Vroblick Letter is dated five (5) days before the Corley Letter, which is dated August 10, 2004.

22. The Vroblick Letter was seized by Sgt. Luker during a search of Kittie Corley's cell at the Houston County Jail on September 30, 2004, about two (2) months after the Corley Letter. *See* Doc. 76-24 at PDF 16, Bates 3857. It is marked and referred to as document "K-1-10" in the U.S. Postal Inspection Service's

(USPIS) handwriting expert report. *See* Appendix A at Wilson Habeas 0088; Wilson Habeas 0077.

23. The Vroblick Letter reads as follows:

Kittie

5 Aug 04

I am going to try to help you. I may know of an attorney who could help you Pro Bono. Write the whole story down—all of it—no lies. An attorney cannot work with lies—I will send it to a friend to make copies & send those copies off for you. Hey, you have already told me the whole story & I have not said anything—

Date it

Trust me.

Joan

Appendix A at Wilson Habeas 0088 (corrected for punctuation); *see* Appendix G (transcription of the Vroblick Letter)

24. The Vroblick Letter entirely corroborates Joan Vroblick’s statement to Sgt. Luker when he interviewed her on September 4, 2004. This is what Sgt. Luker wrote down from his conversation with Vroblick that day:

Ms. Vroblick stated that on 8/08/2004 she got Kittie to write the letter by saying she would send it to a friend to make copies and send it to an attorney who might take her case “pro bono.” Ms. Vroblick identified the letter that I have in my possession as the hand written letter, written by Catherine Corley.

Doc. 76-24 at PDF 16, Bates 3857.

25. It is now evident, based on the Vroblick Letter found in Corley’s possession, that Vroblick had indeed asked Corley to write a confession letter to an attorney, and that Corley received and kept such a request from Vroblick.

26. The Vroblick letter also contradicts Respondent’s “eavesdropping” hypothesis made to this Court in Doc. 147 only seven months ago. In that pleading from December 2025, Respondent wrote to this Court:

It is just as likely that Vroblick eavesdropped and peppered her fabrication with legitimate details. [...]—if Vroblick and Corley were indeed cellmates or housed in proximity, it would not have been difficult for Vroblick to pick up a few nicknames and use them to give a veneer of authenticity to the Corley Letter.

Doc. 147, at p. 42-43.

27. Respondent made that “eavesdropping” argument to the Court while in possession of the Vroblick Letter and without producing it to this Court or to Petitioner, despite the fact that it is directly relevant and material to the question of the Corley Letter’s authenticity.

28. The Vroblick Letter is material to a central issue in this case and contains information about which Petitioner could have cross-examined Sgt. Luker, who testified at trial.

#3. *The Reaper Poem*

29. In the new evidence, there is also a poem written by Kittie Corley (hereinafter “the Reaper Poem”). Appendix A at Wilson Habeas 0093; Appendix H (transcription of the Reaper Poem).

30. The Reaper Poem was seized by Sgt. Luker from Kittie Corley’s cell during the search on September 30, 2004. *See* Doc. 76-24 at PDF 16, Bates 3857. It is labeled and referred to as document “K-1-15” in the USPIS handwriting expert report and was confirmed to have been written by Corley. *See* Appendix A at Wilson Habeas 0093; Wilson Habeas 0077.

31. The Reaper Poem corroborates David Wilson’s statement to the police that Kittie Corley was part of a “weird cult.” Petitioner told the police during his April 14, 2004 interrogation that Corley acted strangely: “she, she was, she was kind of I don’t know what was her, what her, she seem like she said she got a little thrilled with it or some... something like that. She said she guess she was excited I don’t [know] what was up with her.” Doc. 76-3 at PDF 127, Bates 529. Mr. Wilson then said, “I asked her if she was ok. She said yeah sure. Cause she use, cause she use to do stuff like that or something like that. I don’t know exactly what was up with her, what her story is. Cause she’s got in some weird cult thing.” Doc. 76-3 at PDF 128, Bates 530.

32. The Reaper Poem reads as follows:

Reaper you are the reliever of souls, The keeper of the dead.
Reaper on this Night be my soul Keeper.

I gaze into the dark pits of bone where your eyes once were. I
see the only man I have ever given myself fully to.

Strangely I am excited at the mere thought of thee. Strangely I
am not scared of thee.

I watch your flesh-stolen hand reach into my bristling chest
stealing the very air out of my lungs. But I do not struggle or
scream. I just slowly drift into the darkness hoping that you will
be waiting for me on the other side. As I cross over I can feel
my blood run cold as ice. But I embrace it, I am ready to be safe
in your arms. No hurt NO more pain. No more feeling as if my
very skin is being pulled off of my body. So, as I take my final
breath. It feels more like a deep sigh of relief. For it is all over.
I can be with the man I ever truly trusted. My Lover, My fighter,
my everything.

Appendix A at Wilson Habeas 0093 (spelling corrections have been made to render the text legible; crossed-out text is not included); *see* Appendix H (transcription of the Reaper Poem).

33. The Reaper Poem corroborates that Kittie Corley was into “some weird cult thing.” The word “reaper” is most famously associated with the concept of the “grim reaper,” a personification of death as a man with a scythe.

34. As a result of Respondent’s production of the Reaper Poem and its indication that Corley was indeed involved in the occult, Petitioner discovered additional evidence that substantiates Corley’s involvement in cult activities. Petitioner obtained the fee sheet and statement of services of Joy Crawford, a mitigation specialist hired by Corley’s defense team. *See* Appendix I. This fee sheet documents

the work that Ms. Crawford did from July to December of 2007 in preparation for Corley's trial and sentencing. In the fee sheet, the topic of "WICCA" is mentioned three times:

- a. "Read, respond and print emails: from Aiken County DSS; from J. Gagnon Re: WICCA. Email Attorney Sheffield" Appendix I, PDF at 2.
- b. "Checking email (saving in folders) re: WICCA, South Carolina DSS. Left message for Attorney Sheffield re: need to meet re: client Corley. Internet search: WICCA (Selena)." Appendix I, PDF at 3.
- c. "Telephone call from Attorney Crespi re: WICCA sex by corpse, timing, planning mitigation strategy." Appendix I, PDF at 3.

35. Notice that in the last entry it is written "WICCA sex by corpse." Appendix I, PDF at 3. Petitioner presumes this is mitigation work related to Kittie Corley's confession on the front side of the Corley Letter where she wrote: "This story is true, only thing I left out was the sex adventures at Dewey's & that ain't no one's business." Doc. 114-1 and 114-2. Importantly, that information about "sex adventures at Dewey's" was not included in Sgt. Luker's police report, which Respondent admits was the only evidence turned over to Petitioner.

36. Wicca is a modern pagan religion enmeshed in the occult and closely tied to witchcraft. Many adherents use the terms "Wicca" and "Witchcraft" interchangeably. *Witchcraft & Wicca*, The Pagan Federation,

<https://www.paganfed.org/witchcraft/> (last visited July 16, 2026). Wicca lacks a formal governing structure and is often practiced alone. *Wicca*, Encyclopaedia Britannica, <https://www.britannica.com/topic/Wicca> (last visited July 16, 2026). Wiccan practices are ritualistic and meant to evoke the spirit using “magic” and “spells” in the tradition of the long and international history of witchcraft. Helen Berger, *What is Wicca? An expert on modern witchcraft explains*, Brandeis Now (September 17, 2021), <https://www.brandeis.edu/now/2021/september/wicca-berger-conversation.html> (last visited July 16, 2026).

37. Mitigation specialist Joy Crawford’s preoccupation with Wicca, as part of Corley’s core defense strategy, is yet another corroboration of Corley’s involvement in cult activities. It supports the importance of the Reaper Poem as an indicator of Corley’s involvement in witchcraft.

38. The Reaper Poem lends credence to David Wilson’s statement that Kittie Corley was into “some weird cult thing.” Doc. 76-3 at PDF 128, Bates 530. Had Petitioner been provided with this material evidence, Petitioner would have been able to probe into these matters at trial by calling mitigation specialist Joy Crawford as a witness or by cross-examining Sgt. Luker, who was the person who seized and catalogued the Corley writing samples and thus had information (the Reaper Poem) that Corley was involved in the occult. Sgt. Luker would have had to testify on cross-examination that he had in his possession evidence (the Reaper Poem) that

corroborated Petitioner's statement that Corley was into a "weird cult." The fact that a random search of Corley's writings produced the Reaper Poem substantiates the fact that Corley's occult practices played a large part in her life.

#4. *The Corley Bible Verses*

39. On May 20, 2026, Petitioner also for the first time received a document containing Kittie Corley's notes on the Bible, which Sgt. Luker seized from her cell on September 30, 2004 and included in the Corley writing samples. Appendix A at Wilson Habeas 0100 (hereinafter the "Corley Bible Verses"); *see* Appendix N (transcription of the Corley Bible Verses); Doc. 76-24 at PDF 16, Bates 3857 (Sgt. Luker search). This document, labeled "K-1-19," was delivered to the USPIS forensic laboratories as an example of Corley's handwriting and identified as being her handwriting. *See* Appendix A at Wilson Habeas 0100, Wilson Habeas 0077.

40. In the document's right-hand column, Corley lists out the seven bowls, found in the Book of Revelation. Corley writes:

- 1 horrible malignant sores
- 2 sea turn to blood + everything in it died
- 3 Rivers + spring turned to blood
- 4 The sun scorched everyone with fire
- 5 The wor[l]d went dark
- 6 The great river [Euphrates] dried up

7 A great earthquake

Appendix A at Wilson Habeas 0100; *See* Appendix N.

41. Below the seven bowls, Corley writes in large, well-spaced letters: “ARmageddon” [sic]. *Id.*

42. In the Book of Revelation, the seven bowls are God’s final judgement, his final acts against the forces of evil, which result in calamity and wide-scale death on earth. Revelation 16:1-21 (King James). Armageddon is the site of the final battle between the forces of good and evil. Revelation 16:16 (King James). At Armageddon, the kings of the earth, led by demonic forces, are defeated by God in one of the final acts before the establishment of His kingdom. *Armageddon*, Encyclopaedia Britannica, <https://www.britannica.com/place/Armageddon> (last visited July 16, 2026).

43. The seven bowls and Armageddon are cataclysmic, apocalyptic events that represent the ultimate extension of God’s wrath and result in death and destruction. There is a close relationship between the prophecy of Armageddon and contemporary cult practices. For instance, the Branch Davidians, the cult surrounding David Koresh in Waco, Texas, privileged Armageddon and the end of the world. *See* PBS Frontline, *Waco - The Fire Next Time*, September 17-23, 1999, <https://www.pbs.org/wgbh/pages/frontline/shows/apocalypse/readings/waco.html>;

see generally, Armageddon at Waco, ed. Stuart A. Wright (Chicago: University of Chicago Press, 1996).

44. The fact that Corley focused on this part of the Bible is significant. It reveals her preoccupation with death and divine judgement. It substantiates Corley's involvement in cult practices (*supra* ¶ 29 et seq., item #3) and Petitioner David Wilson's statement to police that Corley was involved in a "weird cult." Doc. 76-3 at PDF 128, Bates 530. It also corroborates Corley's preoccupation with death and judgment, which is reflected as well on the front side of the Corley Letter where Corley writes that "It was Dewey's time to go." Doc. 114-1 and 114-2. Petitioner could have presented this information to the jury by means of a skillful cross-examination of Sgt. Luker, who testified at trial.

#5. *The Summary Documents on the Interrogation of Erica Nicole Gray*

45. In the May 20, 2026 production, Respondent provided two new pieces of evidence regarding a January 18, 2005 interrogation of Erica Nicole Gray. Respondent produced a one-page "Agent Investigative Summary" containing three sentences of information about the interrogation, as well as a one-page "Interview Sheet" containing Gray's personal information and four more sentences about what investigators learned from Gray. Appendix A at Wilson Habeas 0115-0116.

46. Erica Gray was apparently C.J. Hatfield's best friend. *See* Appendix A at Wilson Habeas 0399 ("Witnesses and their Testimony" list noting that Gray "says

she is Hatfield’s best friend”). Gray was first interviewed by police on March 14, 2004, one day after the discovery of C.J. Hatfield’s body. Petitioner knows little else about Gray, yet her multiple engagements with police and her presence on the “Witnesses and their Testimony” list as “Hatfield’s best friend” suggest that she possessed important information about Hatfield’s murder.

47. The documents concerning the January 18, 2005 interrogation state that “Gray stated that Doni Mobley told her about two months ago that Katherine Corley hid the gun.” Appendix A at Wilson Habeas 0116.

48. These documents, just produced by Respondent, confirm that Corley hid the murder weapon used in the Hatfield murder. As discussed earlier, this confirms the backside of the Corley Letter as well as Corley’s two police interrogations on January 29, 2005 and March 24, 2005. *See supra* ¶ 17, item #1. Erica Gray is another person that Petitioner could have called as a witness at trial to establish Corley’s role regarding the murder weapon in the Hatfield case and the similar *res gestae* in the Walker murder. In addition, it is possible that Gray may have other incriminating information about Corley that Petitioner might have been able to obtain if he had this evidence earlier.

#6. *The Interrogation of John Edward Parmer*

49. Respondent also produced on May 20, 2026, for the first time, a police interrogation of John Edward Parmer conducted by investigators Allen Hendrickson

and Jason Sullivan of the Henry County Sheriff's Office on March 3, 2005 in the Houston County Sheriff's Office. *See* Appendix C (MPEG-4 movie file of interrogation filed conventionally with the Court); Appendix D (certified court reporter transcription of the video interrogation).

50. John Edward Parmer was a principal suspect in the murder of C.J. Hatfield, and he pled guilty to the criminal homicide of Hatfield in 2009 on a negotiated plea of manslaughter. *See* Doc. 81-14, at p. 3 (John Edward Parmer Alacourt record). In portions of this police interrogation, Parmer confesses that he witnessed the murder of C.J. Hatfield and provides a lengthy and detailed description of the events. *See* Appendix C; Appendix D at pp. 22-52.

51. Parmer stated to the police during this interrogation that Kittie Corley was Scott "Bam Bam" Mathis's girlfriend and had a tattoo with Bam Bam's name on her. Appendix C; Appendix D at p. 85. John Parmer is Bam Bam's brother and therefore this information appears reliable. *See* Appendix C; Appendix D at p. 67.

52. Parmer also stated to the police during the interrogation that Kittie Corley told him that "she knows some stuff about this [Hatfield] case that would get her killed by some people if she said anything about it." Appendix C; Appendix D at p.

74. When pressed on this admission, John Parmer told the police:

she [Kittie Corley] actually come up and said that – she wrote me a letter saying that she was going to help James [Bailey]. ... in any way she could, and then she come back with another

letter that I have in my cell back at the jail that she wasn't going to help because she could get killed if she did. She would sign her death warrant if she helped him.

Appendix C; Appendix D at p. 74.

53. This evidence corroborates both the Corley Letter, in which Kittie Corley admitted having knowledge that could jeopardize her life, as well as the police interrogations of Corley on January 29, 2005, and March 24, 2005, demonstrating that Corley was deeply involved in the murder of C.J. Hatfield. This evidence also corroborates the new evidence from the police interrogation of Heather Lynn Brown who told the police that Corley was “scared to death” because of her involvement in the Hatfield murder. Appendix A at Wilson Habeas 0415-0417. If Petitioner had this evidence at trial, he could have called as witnesses John Parmer and the two investigators, Allen Hendrickson and Jason Sullivan, to validate and confirm the incriminating evidence in the Corley Letter.

#7. The Law Enforcement Summary on John Edward Parmer

54. Respondent's most recent productions also contain a law enforcement summary titled “John Edward Parmer.” This summary appears to synthesize law enforcement's accumulated knowledge of Parmer's involvement in the Hatfield Murder. Respondent lists it as being procured from the State Bureau of Investigation

(SBI), meaning that it was likely compiled by the Alabama Bureau of Investigation (ABI). Doc. 156 at p. 6.

55. The law enforcement summary states the following, in reference to the scene of the crime where C.J. Hatfield was murdered: “Parmer stated that a friend named Corley took him there and dropped him off.” *See* Appendix A at Wilson Habeas 0117. This information is *not* included in the Parmer interrogation. *See supra* ¶ 49, item #6.

56. This piece of evidence regarding Corley’s involvement in the Hatfield crime is highly material because it directly implicates Corley in the murder. Had defense counsel been in possession of this highly material evidence at trial, they could have used it to directly show that Kittie Corley was not only involved in the Hatfield murder, but actually at the scene of the crime.

57. Because the interrogation provided by Respondent does not include this information, this evidence also reveals a highly material missing interrogation of John Parmer. *See infra* Part III, item #1, at ¶ 129.

#8. *The Corley Inmate Request Form*

58. In Respondent’s May 20, 2026 production, there is an “inmate request form” signed by Kittie Corley and dated September 6, 2004. Appendix A at Wilson Habeas 0101; Appendix M (transcription of the Corley Inmate Request Form). This

document, labeled “K-1-20,” was delivered to the USPIS as an example of Corley’s handwriting. *See* Appendix A at Wilson Habeas 0077.

59. The form, dated September 6, 2004, reads:

I am requesting to be put in protective custody. There has been talk of plans to harm me. I feel that if I were to go back I will be harmed. I do not wish to put myself in any danger. I also feel that if I get back I will not be able or might not be able to walk or worse breathe. I seriously fear for my safety + my wellbeing. Please try to see where I am coming from. Please do not send me back, I genuinely feel for my own self + welfare. Thank you for your time.

Appendix A at Wilson Habeas 0101 (spelling corrected); Appendix M.

60. Corley confirms in this inmate request form that she fears for her life. This admission directly substantiates the back side of the Corley Letter, in which Corley says: “Bam Bam will follow through on his promises & threats. I have seen him in action before & I know how bad it will be for me & my child.” Doc. 114-4 at p. 4. This admission also directly corroborates information that John Parmer shared with investigators in his March 3, 2005 interrogation just released by Respondent. *See supra* ¶ 49, item #6. In that interrogation, Parmer shared that Kittie Corley told him that “she knows some stuff about this [Hatfield] case that would get her killed by some people if she said anything about it.” Appendix C; Appendix D at p. 84.

61. Because this information corroborates and lends credibility to the Corley Letter and Parmer’s statements, as well as illustrates the extent to which Corley was

involved in and had knowledge of the murder of C.J. Hatfield, this inmate request form is highly material. Had Petitioner possessed this material evidence at trial, he could have used it in cross-examination of Sgt. Luker to bolster the veracity of the other assertions in the Corley Letter and also those by John Parmer in his March 3, 2005 interrogation, assertions which themselves corroborated statements made on the backside of the Corley Letter. *See supra* ¶ 49, item #6.

#9. *The Dear Buddha Letter*

62. Another letter seized from Kittie Corley’s cell by Sgt. Luker, which was just produced by Respondent, is a letter addressed to “Buddha.” Appendix A at Wilson Habeas 0094 (hereinafter the “Dear Buddha Letter”); *see* Appendix K (transcription of the Dear Buddha Letter). The letter is labelled “K-1-16” and described as “one of 16 known writing documents of Corley.” Appendix A at Wilson Habeas 0094; Wilson Habeas 0075. It is unclear from the letter to whom “Buddha” refers.

63. In the letter, referring to someone called Kevin, Kittie Corley writes, “But sad thing is I remember him from somewhere. Too many drugs, too little time. I don’t quite remember where.” Appendix A at Wilson Habeas 0094 (spelling corrected); *see* Appendix K.

64. Corley’s disclosure of taking so many drugs that they altered her memory corroborates her statements in both the 2004 Dearest David Letter and in her May 10, 2023 police interrogation. *See* Doc. 114-10; Appendix A at Wilson Habeas 0057.

In the Dearest David Letter, Corley writes: “My lawyer has me pleading not guilty. I can beat this so can you. Remember we were all High & drunk. And to my knowledge, you or I didn’t stop drinking all week. But then we all were partying pretty hard.” Doc. 114-10, at p. 3 (spelling corrected). In her 2023 interrogation, Corley states that “I remember telling the police I was high as hell” when she gave a police statement right after the Walker murder. Appendix A at Wilson Habeas 0057.

65. The Dear Buddha Letter is relevant material evidence because it corroborates instances where Corley describes herself as a habitual drug user. It also provides new information about her drug use—namely, that she used drugs to such a degree that the drugs handicapped her memory. Had Petitioner possessed the Dear Buddha Letter, he could have used it at trial to cross-examine Sgt. Luker as to information he had about Corley’s habitual drug use including during the Walker murder.

66. In the beginning of the Dear Buddha Letter, Corley also writes, addressing ‘Buddha’ personally, “Oh yea you still owe me a cover up.” Appendix A at Wilson Habeas 0094; Appendix K. It is unclear exactly what this means, but it could conceivably refer to “covering up” someone’s role in a crime.

#10. The Dear Phillip Letter

67. In the new evidence produced by Respondent, there is a letter written by Kittie Corley, the salutation of which reads “Dear Phillip.” Appendix A at Wilson

Habeas 0096-98 (hereinafter “the Dear Phillip Letter”); *see* Appendix J (transcription of the Dear Phillip Letter).

68. Sgt. Luker seized this three-page letter from Corley’s cell and it is labeled “K-1-17” (each page is labelled “K-1-17-1,” “K-1-17-2,” and “K-1-17-3,” respectively). Appendix A at Wilson Habeas 0096-98. The Dear Phillip Letter is identified as one of the “16 known writing documents of Corley (provided by Dothan PD).” Appendix A at Wilson Habeas 0075.

69. The addressee’s full name, as stated in the letter, is Phillip Grady Boles. The Dear Phillip Letter is not addressed to Petitioner.

70. In this letter, Kittie Corley confirms that she has Scott “Bam Bam” Mathis’ name tattooed on her arm: “I had his name put on my arm. Well Scott did it. I thought I loved him. I would do as he ordered to do.” Appendix A at Wilson Habeas 0097; *see* Appendix J.

71. This evidence corroborates the back side of the Corley Letter, in which Corley reveals an intimate relationship with Bam Bam, including driving to the crime scene of the Hatfield murder with him and following all his orders. *See* Doc. 114-4 at p. 3. It also directly corroborates Corley’s statement during her January 29, 2005, police interrogation with Investigator Hendrickson, where she said, “I have his [Bam Bam’s] name on my hand – I have his name on my arm.” *See* Doc. 114-6 at p. 5. Moreover, it aligns with what Kittie Corley told investigators in her March

24, 2005 interrogation. When asked why the murder weapon in the C.J. Hatfield case was in her safe box, she replied, “Because I was told to hold it. [...] By Bam Bam.” Doc 114-8 at p. 15. Had Petitioner been in possession of the Dear Phillip Letter, he could have used it to cross-examine Sgt. Luker and substantiate the confessions in the Corley Letter at trial.

72. A bit later in the Dear Phillip Letter, Corley writes, “I try not to let shit get to me. B/c I fear going off + hurting people. I don’t like to hurt ppl.” Appendix A at Wilson Habeas 0097; *see* Appendix J at 6. This propensity for violence matches her statement in the Corley Letter, where she callously writes, “It was Dewey’s time to go.” Doc. 114-1 and 114-2.

#11. The Vroblick ABI Investigative Summary

73. The documents that Respondent just produced also include a one-page “Agent Investigative Summary” from the ABI concerning the police interrogation of Joan Dixra Vroblick conducted by Deputy Troy Silva of the Henry County Sheriff’s Office and Officer Nick Cheek of the Abbeville Police Department on August 3, 2004, at the Houston County Jail. *See* Appendix A at Wilson Habeas 0114.

74. The summary report is dated March 15, 2005, more than 7 months after the police interrogation of Joan Vroblick. The summary report was made by ABI agent William T. Merritt and reviewed by ABI agent Edward Lee Odom, although the

actual interrogation had been conducted seven months earlier by different law enforcement officers. *See id.*

75. The interrogation itself covered a lot of ground. The summary report from March 15, 2005 refers to the “interview sheet,” which is included at Appendix A at Wilson Habeas 0407. It mentions a lot of people, by both name and nickname, including Ghost, Iceman, Ice, Tank, Czar, C.J. Hatfield, Stuckey, Jessy, and others, as well as locations, such as Bankhead Highway, Atlanta. *See* Doc. 114 at pp. 127-128; Docs. 114-11 and 114-12.

76. Despite the fact that the interrogation covered so much ground, the summary report made by different ABI investigators more than seven months later only retains the name of two people: Kittie Corley and her then-boyfriend, Bam Bam. *See* Appendix A at Wilson Habeas 0114.

77. The first and most important piece of information highlighted in that summary report is the following: “VROBLICK mentioned KATHLEEN CORLEY (KITTY).” *Id.* Then, the second and only other piece of information retained in the summary is that Vroblick “said that BAM BAM (MATHIS) killed HATFIELD.” *Id.*

78. The fact that the two independent ABI investigators, who reviewed this interrogation seven months after the fact, chose to summarize the interrogation with only these two sentences indicates their understanding of the importance of Corley and Bam Bam in the Hatfield murder. The singular presence of “KATHLEEN

CORLEY (KITTY)” as the summary’s first note indicates that Corley was a leading suspect in the Hatfield murder investigation and thus, one can reasonably conclude, was centrally involved in the murder itself. This information, bolstered by Vroblick’s detailed and correct list of aliases confirm that Corley was at the heart of a violent drug ring headed by her fiancée Bam Bam Mathis and that Corley told Vroblick everything about the Hatfield murder. Had Petitioner been in possession of this important piece of downstream evidence at trial, Petitioner could have called the ABI investigators as witnesses at trial to establish that Corley was heavily involved in the Hatfield murder and support the assertions made on the back side of the Corley Letter. Petitioner could also have presented this evidence through skillful cross-examination of Sgt. Luker.

#12. The ABI Summary of the Kittie Corley Interrogation

79. The new documents produced also include a one-page “Agent Investigative Summary” from the ABI concerning the police interrogation of Kittie Corley conducted by Agents William T. Merritt and Allen Hendrickson, and reviewed by Edward Lee Odom. The report is dated March 28, 2005; the interview took place at the Houston County Jail on March 24, 2005. *See* Appendix A at Wilson Habeas 0001-0004.

80. The report identifies the highlights of Corley’s interrogation, including the fact that Corley was Bam Bam’s girlfriend, that Bam Bam told Corley to keep a

revolver in her strong box along with drugs (which she did), and that Corley gave the strong box to and later received the strong box from the people who allegedly killed Hatfield (Bam Bam, Andrew White, Mark Hammond). *Id.*

81. The report is significant because it credits Corley's interrogation statements. There is no indication that the ABI agents thought Corley was being untruthful, that she was unreliable, or that her information was irrelevant. If Agent Merritt believed that Corley was lying during the interrogation, he would have noted that in the report he completed only four days afterward. Instead, the information from Corley's interview was included in a chronological summary of the Hatfield investigation. *See* Appendix A at Wilson Habeas 0005.

82. Merritt and Hendrickson interrogated Corley for 30 minutes on March 24, 2005. Doc. 114-8, at p. 3 and 44. The contents of the interview ranged widely—from whether Mark Hammond's truck contained potential evidence, to David James Stuckey and C.J. Hatfield's trip to Atlanta, to dealing narcotics, to the identity of other individuals. Doc. 114-8. But these details did not make it into the summary report—rather, Corley's possession of the murder weapon did. Out of the report's 12 sentences, 5 of them describe Corley's possession and identification of the Rossi revolver. Appendix A at Wilson Habeas 0001.

83. The pattern of behavior described in this report—specifically, possessing the murder weapon—matches the behavior described on the front side of the Corley

Letter. *See supra* ¶ 19; Doc 114-1, at p. 2 (“We took a baseball bat with us [...] I threw baseball bat in trash dumpster.”) This mirrors her behavior in the Hatfield murder, where she had control of the revolver, hid the revolver, and then provided it to Mathis, White, and Hammond. *See supra* ¶ 13 et seq., item #1.

84. Had Petitioner been in possession of this material downstream evidence at trial, he could have used it to cross-examine Sgt. Luker and support the connection between Corley’s involvement with the murder weapon in the Hatfield and Walker murders and undermine the state’s theory that Corley was not involved in the murder of Dewey Walker.

#13. The Interrogation of Mark Hammond

85. Respondent also produced on May 20, 2026, a police interrogation of Mark Hammond conducted by investigator Allen Hendrickson of the Henry County Sheriff’s Office on February 26, 2005. *See* Appendix E (MP3 audio file of interrogation filed conventionally with the Court); Appendix A at Wilson Habeas 0419-0430 (official police transcription of the interrogation).

86. Mark Hammond was a prime suspect in the murder of C.J. Hatfield and was charged with murder. Hammond eventually pled guilty to hindering prosecution. *See* Doc. 81-16, at p. 3.

87. In his police interrogation, Hammond states that Kittie Corley was Scott “Bam Bam” Mathis’s girlfriend. *See* Appendix E; Appendix A at Wilson Habeas 423 (“I know another girl named Kitty that Bam Bam dated”).

88. During the police interrogation, the investigator, Allen Hendrickson, states that Kittie Corley has “Bam Bam’s name tattooed” on her body. *See* Appendix E; Appendix A at Wilson Habeas 423; Doc. 114-39 (confirming Corley bears a tattoo described as “2 HEART SYMBOLS WITH SCOTT”).

89. The fact that Corley tattooed Bam Bam’s name on her body with heart symbols is independent corroboration of her relationship with Bam Bam, which she writes about in the Corley Letter and tells the police in her two interrogations. If this evidence had been produced at trial, Petitioner could have called Hammond and Hendrickson as witnesses to independently corroborate Corley’s relationship with Bam Bam and support the veracity of what she confessed to on the back side of the Corley Letter as a way to bolster what she said on the front side of the Corley Letter.

#14. The Dear Travis Letter

90. Respondent also produced on May 20, 2026, a letter from Kittie Corley to a recipient named Travis. *See* Appendix A at Wilson Habeas 0104 (hereinafter “the Dear Travis Letter”); Appendix L (transcription of the Dear Travis Letter).

91. In that letter, Kittie Corley writes “I have only one son he is 2 soon to be 3.” Appendix A at Wilson Habeas 0104; Appendix L. This corroborates the backside of

the Corley Letter, on which Corley wrote “Bam Bam told me not to talk or he will kill my child and me. If David talks Bam Bam will kill me or my child or both of us.” Doc. 114-4, at p. 3.

92. Later in the Dear Travis Letter, Kittie Corley writes “I know how you feel I was engaged when I first got here now nothing.” Appendix A at Wilson Habeas 0104. This statement corroborates Corley’s January 29, 2005 interview with Agent Allen Hendrickson of the Henry County Sheriff’s Office in which Corley shared the following:

HENDRICKSON: Okay. Well, did you -- I take it you knew -- you dated Bam Bam for a while?

CORLEY: Yes, sir. I’m his fiancé.

HENDRICKSON: You’re his fiancé?

CORLEY: It’s a twisted thing. I know.

HENDRICKSON: You know what?

CORLEY: I know who he’s with now. I’m still engaged to him. I have his engagement and wedding band in my pocket.

Doc. 114-6 at pp. 5-6.

93. The depth of Corley’s relationship with Bam Bam provides critical context to the back side of the Corley Letter, in which Corley describes following Bam Bam’s instructions, driving to the scene of the Hatfield murder with him, and remaining silent due to the leverage that he exerted over her. *See* Doc. 114-4 at p. 3.

94. The Dear Travis Letter is material because, had Petitioner been in possession of the Corley Letter, he could have used the Dear Travis Letter to confirm the assertions made in the Corley Letter and therefore support its validity. In the same way that Petitioner lacked access to the Corley Letter, Petitioner also never had access to this material piece of downstream evidence that Petitioner would have used to support the veracity of the Corley Letter.

#15 & #16. Law Enforcement Summaries on Mark Hammond & Scott Mathis

95. Respondent also produced on May 20, 2026, two one-page law enforcement summaries titled “Mark Anthony Hammond” and “Scott Mathis.” Appendix A at Wilson Habeas 0118 and Wilson Habeas 0119.

96. These undated summaries contain information about Hammond and Mathis collected from multiple different witnesses. The summaries were located in the files of the SBI and therefore were likely made by the ABI. Doc 156 at p. 6.

97. The law enforcement summaries on both Hammond and Mathis state the following:

Catherine Corley said she had a strongbox that Scott Mathis had her store a handgun in. The box was in Hammond's possession some of the time. She said that she took care of CJ with his gift and she knew that gift to be a 38 revolver that an unknown person gave him.

Appendix A at Wilson Habeas 0118; Wilson Habeas 0119.

98. In the law enforcement summary of Scott Mathis, the narrative continues:

Corley said she saw Mathis put shorts and a button down shirt which he said belonged to Mark Hammond, along with clothing she knew belonged to Mathis, in a trash bag for disposal on the same day that they also asked for a water hose to wash out the truck. This happened at the place where she was staying in Dothan. It was the same day that he said he took care of CJ with his gift. This is believed to be Friday March 12, 2004.

Appendix A at Wilson Habeas 0119.

99. These pieces of evidence confirm Kittie Corley's involvement in the Hatfield murder and its aftermath and, like so many of the new pieces of evidence already discussed, corroborate the information on the back side of the Corley Letter and in Corley's interrogations. Corley specifically mentions Mathis getting rid of the clothes in her January 29, 2005 interrogation. This evidence sheds new light on the extent of Corley's involvement in the Hatfield murder. For the first time we learn that evidence of the crime was cleaned and disposed of "where she was staying in Dothan." Appendix A at Wilson Habeas 0119. The fact that her residence was the location of this destruction of evidence reveals the extent of her involvement in the crime. Petitioner could have presented the substance of these summaries through skillful examination of Sgt. Luker or Kittie Corley or the other investigators.

#17. The Chronological Summary of Investigation

100. In its most recent production, Respondent released a seven-page document titled "Chronological Summary of Investigation," dated June 4, 2007.

Appendix A at Wilson Habeas 0107-0113. Respondent indicated that this chronological summary, which appears to be internal work product, was sourced from the SBI. Doc. 156 at p. 6.

101. The chronological summary provides the reader with a detailed understanding of the suspects that the police investigated as well as the course of the investigation, covering events from March 14, 2004, the day that C.J. Hatfield's body was discovered, to March 24, 2005. Appendix A at Wilson Habeas 0107-0113.

102. Eleven separate entries in the Chronological Summary reference Scott "Bam Bam" Mathis and the police's evolving understanding of his involvement in the Hatfield murder. *Id.* This large amount of material cumulatively supports Kittie Corley's assertion on the backside of the Corley Letter that Bam Bam murdered C.J. Hatfield. Doc. 114-4, at p. 3.

103. One example of the new evidence gathered on Bam Bam from the chronological summary is the following report of a polygraph examination that he submitted to:

Did you shoot CJ Hatfield? NO

Did you shoot CJ Hatfield with a 38 caliber handgun? NO

Were you present when CJ Hatfield was shot? NO

Mathis appeared to be deceptive to the relevant questions.

Appendix A at Wilson Habeas 0110.

104. Had defense counsel been in possession of this chronological summary and the material evidence in it at trial, defense counsel would have used said evidence, such as that from the polygraph examination, to support the assertions made in the Corley Letter that Bam Bam was a dangerous and violent individual implicated in the murder of C.J. Hatfield. Defense counsel was never able to substantiate the Corley Letter in this way because they never had access to this important piece of evidence.

II. THERE ARE OTHER LAW ENFORCEMENT AGENCIES THAT MAY HAVE RELEVANT EVIDENCE. RESPONDENT SHOULD REVIEW THEIR FILES

105. The new evidence produced on May 20, 2026, reveals that there are other law enforcement agencies involved in the investigations of the Walker and Hatfield murders that have not yet been reviewed for relevant evidence.

106. Petitioner respectfully moves the Court to direct Respondent to review the files of those law enforcement agencies, pursuant to this Court's order dated April 6, 2026 (Doc. 151) and the two prior orders (Doc. 67 at 11–14; Doc. 79 at 10–14), the decisions in *Brady* and *Bracy*, and the “good cause” standard of Rule 6 of the Habeas Rules.

#1. Abbeville Police Department

107. The newly produced evidence indicates that the Abbeville Police Department was involved in the investigation of the Hatfield murder.

108. First, the new evidence discloses that the police interrogation of Joan Vroblick at the Houston County Jail on August 3, 2004, was conducted by an officer of the Abbeville Police Department, Nick Cheek, as well as Deputy Troy Silva of the Henry County Sheriff's Office. *See* Appendix A at Wilson Habeas 0114.

109. Second, Petitioner learned from the newly-released evidence that the Abbeville Police Department was involved in the Hatfield murder investigation from the start, being one of the first agencies to arrive at the scene where C.J. Hatfield's body was found. *See* Appendix A at Wilson Habeas 0107.

110. To date, however, Respondent has not searched the files of the Abbeville Police Department. Respondent, in its response to the discovery order, did not ask the Abbeville Police Department for its files. *See* Doc. 156.

111. Accordingly, Petitioner requests that Respondent review and produce all relevant materials from the files of the Abbeville Police Department, especially materials related to the Vroblick interrogation.

#2. Houston County Sheriff's Office

112. Respondent's most recent productions include new evidence which indicate that the Houston County Sheriff's Office was heavily involved in the investigation of the Hatfield murder. Petitioner learned from the newly produced evidence that:

- a. Five officers from the Houston County Sheriff's Office—Lieutenant Donald Valenza and Deputies Terry Nelson, Donovan Arias, Adam Robinson, and Brazier—were included on the witness list for the Hatfield murder. Appendix A at Wilson Habeas 399.
- b. The law enforcement summary of information concerning Mark Hammond states that “Hammond was identified and [sic] Houston County Investigators. Hammond gave information that led to the location and arrest of Stuckey.” Appendix A at Wilson Habeas 0118.
- c. A chronological summary of the investigation reveals that “based on information obtained from Mark Hammond by Houston County Investigators, Terry Nelson and others, James Stuckey was arrested.” Appendix A at Wilson Habeas 0109.
- d. An investigative summary details how Erica Nicole Gray was interrogated at the Houston County Sheriff's Office. Appendix A at Wilson Habeas 0115.
- e. A controlled wired conversation between Anne Nguyen and Sara Drescher was orchestrated and overseen by police in Houston County. Appendix A at Wilson Habeas 0112.

113. The above information, gathered from Respondent's most recent production, reveals that the Houston County Sheriff's Office played a large role in the Hatfield murder investigation.

114. The involvement of the Houston County Sheriff's Office in the Hatfield murder investigation is consistent with the facts of the case. Dothan, the nearest major urban center to the Hatfield murder scene, was at the center of much of the investigation and is in Houston County. Important figures in the investigation were interviewed in the Houston County Jail, including Heather Lynn Brown, John Parmer, and Kittie Corley.

115. Respondent, in its response to the discovery order, did not appear to review the Houston County Sheriff Office's files related to the investigation of the Hatfield murder. In reference to the Houston County Sheriff's Office, Respondent writes that "Counsel contacted the Sheriff's Office in search of records but was informed that they had none. DPD handled the Walker case, not the sheriff's office." Doc. 156 at p. 2. Apparently, Respondent did not ask the Houston County Sheriff's Office for files on the Hatfield murder investigation.

116. Consequently, Petitioner requests that Respondent review and produce all relevant materials regarding the Hatfield murder investigation from the Houston County Sheriff's Office.

#3. Headland Police Department

117. The newly produced evidence also indicates that the Headland Police Department was involved in the investigation of the Hatfield murder.

118. A chronological summary of the Hatfield murder investigation, produced on May 20, 2026, describes how on March 15, 2004, “Morris Scott Mathis made contact with a Headland Police Officer and was interviewed at [the] Headland Police Department.” Appendix A at Wilson Habeas 0108.

119. That interrogation of Mathis at the Headland Police Department was extremely important and material:

- a. In the interrogation, Mathis identified both David James Stuckey and Mark Hammond as involved in the murder. Appendix A at Wilson Habeas 0108.
- b. Mathis identified the firearms that Stuckey and Hammond carried. *Id.*
- c. Mathis described how he “received a call from Stuckey saying that he shot Hatfield.” *Id.* at Wilson Habeas 0109.
- d. Mathis described how Stuckey urinated at the scene, where Stuckey shot Hatfield, and what type of truck Stuckey was driving. *Id.*

120. Mathis’s interrogation is made more material by Kittie Corley’s assertion that she stored his gun. Appendix A at Wilson Habeas 0119. Mathis may

well have spoken about Kittie Corley in his interview. Petitioner is unaware because no transcript or recording of the interrogation was produced by Respondent.

121. Even though this highly material interview was conducted by and took place at the Headland Police Department, it does not appear that Respondent searched the Headland Police Department files. There is no indication in its Response to the discovery order that the Headland Police Department files have been reviewed. *See* Doc. 156. Petitioner requests that Respondent review and produce any relevant evidence from the Headland Police Department's files.

#4. Jackson County Sheriff's Department

122. Respondent's most recent productions include evidence which indicates that the Hatfield murder investigation extended into Jackson County, Florida, where, Petitioner learned, the Jackson County Sheriff's Department assisted in the investigation.

123. On a list titled "Witnesses and Their Testimony," turned over in the May 20, 2026 batch of files, Jackson County Sheriff's Department Investigator Kevin Arnold is identified as "[assisting] in locating and interviewing witnesses in Jackson County." Appendix A at Wilson Habeas 0399.

124. From a chronological summary of the Hatfield murder investigation, also turned over in the May 20, 2026 batch of files, Petitioner learned that Investigator Allen Hendrickson rode with Heather Lynn Brown to Jackson County,

where they were joined by Jackson County Investigator Kevin Arnold. Appendix A at Wilson Habeas 0111.

125. The same chronological summary of the Hatfield murder investigation reveals that witnesses Brian Johns and Patrick Bushman were interviewed the next day, presumably by Investigator Allen Hendrickson and Jackson County Investigator Kevin Arnold. *Id.* Patrick Bushman, one of the witnesses presumably interviewed by Jackson County Investigator Kevin Arnold, assisted in hiding David James Stuckey's truck in the yard of one Brian Johns.

126. For these reasons, Petitioner requests that Respondent review and produce any relevant evidence from the Jackson County Sheriff's Department.

III. THERE ARE OTHER RELEVANT DOCUMENTS AND RECORDINGS THAT HAVE NOT YET BEEN PRODUCED BY RESPONDENT

127. The evidence produced by Respondent on May 20, 2026, also reveals that there are other relevant documents and recordings that Respondent has not yet produced to Petitioner.

128. Petitioner respectfully moves the Court to direct Respondent to produce these materials, pursuant to the Court's prior orders Docs. 151, 67, and 79, the rulings in *Brady* and *Bracy*, and Rule 6 of the Habeas Rules.

#1. The Other Police Interrogation of John Edward Parmer

129. The law enforcement summary of information concerning John Edward Parmer (*see supra* ¶ 54, item #7) contains the following indication, referring to the scene of the crime where C.J. Hatfield was murdered: “Parmer stated that a friend named Corley took him there and dropped him off.” *See* Appendix A at Wilson Habeas 0117.

130. In its May 20, 2026 production, Respondent turned over one police interrogation of John Edward Parmer conducted on March 3, 2005. *See supra* ¶ 49 et seq., item #6; Appendices C and D.

131. However, in that police interrogation, Parmer nowhere mentions that Kittie Corley drove him to the scene of the Hatfield murder.

132. Accordingly, there must exist another police interrogation of John Parmer where he states that Kittie Corley drove him to the scene of the Hatfield murder.

133. During the March 3, 2005 interrogation of Parmer, which began at 7:36 PM, officer Jason Sullivan and John Parmer had this exchange:

Sullivan: We approached you earlier this afternoon regarding what information you might have pertaining to the murder of C.J. Hatfield in March of the year 2004.

Parmer: Uh-huh (positive response).

Sullivan: And we talked to you a few minutes there in the Houston County Jail?

Parmer: Yes, sir.

Appendix C; Appendix D at p. 5.

134. Petitioner believes that officer Sullivan was referring to the missing interrogation which would have been conducted earlier that same afternoon by officers Allen Hendrickson and Jason Sullivan of the Henry County Sheriff's Office at the Houston County Jail. If this is the case, the interrogation would be in the files of the Houston County Sheriff's Office or the Henry County Sheriff's Office.

135. Petitioner is entitled to this other police interrogation of John Parmer.

136. Given the materiality of Parmer's statement that Corley drove him to the Hatfield murder scene, in the event that Respondent is unable to locate this interrogation of Parmer, Petitioner would request the opportunity to depose Parmer, pursuant to this Court's order dated April 6, 2026 (Doc. 151) and the authorities cited *infra* Part IV, Section C.

#2. The Other Police Interrogations of Mark Hammond

137. The police interrogation of Mark Hammond provided by Respondent is only 15 minutes and 22 seconds long. *See* Appendix E. It opens with investigator Allen Hendrickson of the Henry County Sheriff's Office stating "Today's date is 2-26-2005. We will be picking back up on the interview with Mr. Mark Hammond. Mr. Hammond I stopped the tape a while ago. Um. Was you threatened, promised or [coerced] anything while that tape was off?" Appendix A at Wilson Habeas 0419.

138. During that police interrogation, Hendrickson repeatedly refers to an earlier interrogation during which Hammond spoke about Kittie Corley. “So, if in your first interview you said you were with Kitty and Diane that would be incorrect.” Appendix A at Wilson Habeas 0423.

139. In his Response, Respondent described the file of the Hammond interrogation that he just produced as the “audio recording of Mark Hammond’s second February 26, 2005, interview.” Doc. 156 at p. 9. The MP3 audio file that was released by Petitioner in the May 20, 2026 production is titled “Mark Hammond Statement - 2-26-05 (Part 2).”

140. The interrogation itself also makes clear that there were earlier interrogations of Hammond. In the second interrogation, Hendrickson and Hammond discuss how the large number of earlier interrogations Hammond had been subject to had affected Hammond’s recollection of events. When asked how he recalls certain details, Hammond responds that he remembers them “Cause I’ve been asked the question so many times.” Appendix A at Wilson Habeas 0427.

141. According to the “Chronological Summary of Investigation” just released by Respondent, one of those earlier interrogations occurred on March 17, 2004 at the Houston County Sheriff’s Office. Appendix A at Wilson Habeas 0109.

142. Mark Hammond is a central figure in the Hatfield murder investigation and directly implicated Kittie Corley. The strongbox in which Kittie Corley stored

the murder weapon was also in Hammond's possession. Appendix A at Wilson Habeas 0118. Additionally, Hammond's relationship with Corley was close enough that he asked her to say "that he was with her at her place at the time the murder took place." *Id.* Hammond was so close to Corley that he entrusted her with his alibi. Because of Hammond's close relationship with Corley, his other interrogations are likely highly material.

143. Accordingly, Petitioner is entitled to any other police interrogations of Mark Hammond.

144. Incidentally, it appears that the second portion of the Hammond interrogation was not the final segment. At the end of the second police interrogation of Hammond, Hendrickson says "You got any questions? Give me a minute to try to review my records. I'm gone stop for a brief minute to try and review some records." Appendix A at Wilson Habeas 0430. There is no formal end of the interrogation, which is unusual, indicating that Hendrickson likely planned to restart the interrogation after a short break, and that there might therefore be a subsequent part of the interrogation. Petitioner would ask that, while Respondent retrieves the earlier interrogations, Respondent also determines whether there are subsequent portions as well.

145. Given the materiality of Hammond's interrogation, in the event that Respondent is unable to locate the interrogation(s) of Hammond, Petitioner would

request the opportunity to depose Hammond, pursuant to this Court's order dated April 6, 2026. Doc. 151 and the authorities cited *infra* Part IV, Section C.

#3. The Police Interrogation of Scott "Bam Bam" Mathis

146. The newly-produced law enforcement summary of information concerning Scott "Bam Bam" Mathis (*see supra* ¶ 95, item #16) states that "Scott Mathis came forward on March 15, 2004 and was interviewed at Headland Police Department." Appendix A at Wilson Habeas 0119.

147. Because of Bam Bam's central role in the C.J. Hatfield murder, as well as his close relationship with Kittie Corley, any interrogation of Bam Bam is highly material.

148. Petitioner is entitled to the March 15, 2004 police interrogation of Bam Bam.

149. Given that this interrogation took place at the Headland Police Department on March 15, 2004, Petitioner believes that a transcript or audio recording of this interrogation can be found in the files of the Headland Police Department.

150. Given the materiality of Mathis's relationship to Kittie Corley, in the event that Respondent is unable to locate this interrogation of Mathis, Petitioner would request the opportunity to depose Mathis, pursuant to the reasoning in Doc. 151 and the authorities cited *infra* Part IV, Section C.

#4. The Police Interrogation of Joan Vroblick on August 3, 2004

151. The documents that Respondent just produced on May 20, 2026 include a one-page “Agent Investigative Summary” from the ABI and a one-page “Interview Worksheet” from the Henry County Sheriff’s Office concerning the police interrogation of Joan Dixra Vroblick conducted by Henry County Sheriff Deputy Troy Silva and Abbeville Police Officer Nick Cheek on August 3, 2004, at the Houston County Jail. *See* Appendix A at Wilson Habeas 0114; Wilson Habeas 0407. These documents indicate that the August 3, 2004 interrogation of Vroblick was highly material, especially given that it involved discussion of Kittie Corley. *See supra* ¶ 73 et seq., item #11.

152. Despite the highly material nature of this interrogation, Respondent writes that “recordings or transcripts of the interviews with Vroblick and Gray were not located in the file.” Doc. 156 at p. 6.

153. There is every reason to believe, especially given the fact that two ABI agents were able to prepare a summary report on the interview seven months after the fact, that an audio or transcript record of the interrogation does in fact exist.

154. Petitioner is entitled to the recording and transcript of the August 3, 2004 interrogation of Joan Vroblick. It is likely that, given that their personnel conducted the interrogation, the recording and transcript of this interrogation can be

found in the files of the Henry County Sheriff's Office or the Abbeville Police Department, or in the ABI files which had them last.

#5. The Police Interviews of Erica Nicole Gray

155. Respondent's newly-produced documents include a one-page "Agent Investigative Summary" and a one-page "Interview Sheet" from the interview of Erica Nicole Gray on January 18, 2005 by Agent William T. Merritt of the ABI and Allen Hendrickson of the Henry County Sheriff's Office. *See* Appendix A at Wilson Habeas 0115; Wilson Habeas 0116. Petitioner knows little about Gray, except that she was understood to be C.J. Hatfield's best friend and was regarded by police as an important witness in the case. *See supra* ¶ 45 et seq., item 5.

156. These two summaries reveal that Gray provided material information on Corley in the interview, making that interview and any others involving Gray highly relevant. *See supra* ¶ 48, item 5.

157. The "Agent Investigative Summary" document is stamped with a header that includes "FURNISHED BY _ALEA_." Appendix A at Wilson Habeas 0115. The same file includes the note "See attached interview." *Id.*

158. Respondent did not produce the actual interview, writing that "recordings or transcripts of the interviews with Vroblick and Gray were not located in the file." Doc. 156 at p. 6.

159. Petitioner is entitled to the recording and transcript of the August 3, 2004 interview of Erica Nicole Gray, and respectfully requests that Respondent again search the files of the ABI and the Henry County Sheriff's Office.

160. Additionally, the “Chronological Summary of Investigation” just released by Respondent reveals that on March 14, 2004, Erica Nicole Gray was also interviewed. Appendix A at Wilson Habeas 0108. Given that Gray’s other interview yielded such highly material information and revealed Gray to be aware of Corley’s role in the Hatfield murder, the March 14, 2004 interview is also material.

161. Petitioner is entitled to and respectfully requests the March 14, 2004 interview of Erica Nicole Gray.

#6. The “Script”

162. From the June 4, 2007 “Chronological Summary of Investigation” document just released by Respondent on May 20, 2026, Respondent learned that on February 28, 2005, “Sarah Drescher’s bedroom was searched pursuant to a warrant” and “A collection of papers was seized that appeared to be a rehearsed statement or script written by Drescher.” Appendix A at Wilson Habeas 0112.

163. The same chronological summary describes how Drescher wrote out stories for the other participants in the Hatfield murder: “Parmer stated that after the shooting, a meeting was held at a female’s house at which time each participant got their story straight. Parmer stated that he saw Sara Drescher writing a statement on

multiple pages that she tore from a binder containing perforated pages.” Appendix A at Wilson Habeas 0112.

164. Based on the police’s description of the document and Drescher’s role in writing statements for those involved in the Hatfield murder, the “script” seized from Drescher’s bedroom is presumably a representation of the story that those involved in the Hatfield murder were going to tell the police.

165. The nature of the inclusion or exclusion of Kittie Corley on this “script” would be highly material information and would contextualize Corley’s involvement in the murder of C.J. Hatfield as well as her relationship with the others involved.

166. Petitioner is entitled to the “script” seized in Sarah Drescher’s bedroom on February 28, 2005.

#7. The Police Interrogation of Sarah Drescher

167. From the June 4, 2007 “Chronological Summary of Investigation” document just released by Respondent on May 20, 2026, Petitioner also learned that Sarah Drescher was interrogated by police a second time, on March 15, 2004. The chronological summary reads as follows:

Monday, March 15, 2004, at about 330 pm, Drescher was interviewed a second time. This interview was recorded and transcribed. Many details recorded in this interview, were later found documented in a multi-page letter written by Drescher and found in her home pursuant to a search warrant.

Appendix A at Wilson Habeas 0108.

168. The “multi-page letter” referenced in the summary is in all likelihood the “Script,” which Petitioner has already shown to be material. *See supra* ¶ 162 et seq., item #6.

169. As Petitioner has already shown Sarah Drescher’s “Script” to be material, Petitioner is entitled to the recording and transcription of this interrogation of Sarah Drescher on the same grounds.

IV. THIS COURT SHOULD RECONSIDER PETITIONER’S REQUEST FOR MORE LIMITED ACCESS TO THE INVESTIGATIVE FILES IN THE WALKER AND HATFIELD MURDERS, OR CONDUCT REVIEW IN CAMERA

170. The revelations from the May 20, 2026, productions concerning Respondent’s exercise of discretion on December 7, 2023, and on December 15, 2025, lead Petitioner to respectfully request that the Court reconsider the question of Petitioner’s access to the law enforcement files, this time on a more limited basis. The revelations raise serious questions about whether Respondent can be trusted to produce relevant material evidence in its possession. This is clear from the experience surrounding the Vroblick Letter (*supra* item #2 at ¶ 21 et seq.), to take just one example.

A. The Vroblick Letter

171. Respondent had the Vroblick Letter in his possession for several years, stated that it was *not* relevant, and *only* produced it in 2026 because this Court specifically ordered Respondent to “turn over to petitioner” *all* of the Corley writing samples—*not just* to determine whether Respondent believed they were relevant and responsive to the order, but to “turn them over,” without permitting Respondent to exercise their own discretion. In effect, the Court was granting Petitioner access to the Corley writing samples file. And barring that, *Petitioner still today would not even know of the existence of the Vroblick Letter.*

172. Previously, on December 7, 2023, Respondent reported to this Court that *he had unsealed the envelope containing the Corley writing samples*, and *reviewed all the documents*, and determined effectively that the Vroblick Letter *was not relevant*. Respondent determined that there was *only one document* he would turn over (namely, the “Dearest David” letter) in response to Petitioner’s fourth *Brady* motion. *See* Doc. 86, at p. 7-8, ¶ 16.²

173. In 2023, during Respondent’s review of the Corley writing samples, Respondent would have inspected the Vroblick Letter, which was in the envelope along with the other writing samples, and he considered it nonresponsive.

² As for this clearly material “Dearest David” letter, Respondent would not even concede that it was relevant to this litigation. Doc. 86, at p. 8 (“Respondent does not concede that this document was discoverable, material, exculpatory, or otherwise relevant to this action.”).

174. Thus, having reviewed the Vroblick Letter, Respondent did *not* believe that the Vroblick Letter was pertinent and did *not* produce it. In fact, Respondent did not even *mention* it, despite the fact that Mr. Wilson clearly stated in his Fourth *Brady* motion, to which Respondent was responding in December 2023, that he was requesting “all favorable evidence in the State’s possession regarding Kittie Corley [...] that is necessary for undersigned counsel to investigate and determine the materiality of any potential *Brady* violation, and to argue the preliminary questions of ‘cause’ and ‘prejudice’ to excuse any possible procedural default.” Doc. 81, at p. 19, ¶ 32. Petitioner made clear that he needed “access to *all* favorable evidence regarding Corley, or alternatively, to receive confirmation on the record that no such evidence exists.” Doc. 81 at pp. 19-20, ¶32 (emphasis added). Despite that, Respondent failed to even mention the existence of the Vroblick Letter.

175. Two years later, in 2025, Respondent *again* reviewed the Vroblick letter and did *not* turn it over, *nor* even mention it.

176. This is what Respondent maintained about the Vroblick Letter on December 15, 2025, in response to Petitioner’s renewed *Brady* motion: “Respondent conducted an extensive investigation of the files and found no *Brady* material. What is before the Court now is an attempt to embark on a fishing expedition.” Doc. 147, at pp. 37-38. According to Respondent, the search of the Vroblick Letter was nothing more than a “fishing expedition.”

177. Respondent specifically mentions the Corley writing samples (which included the Vroblick Letter) in its pleading from December 2025, and this is what Respondent had to say:

What about Corley’s writing samples? Looking at the police report, the only document for which Corley claimed authorship was a white legal pad on a shelf by her bed. DE76-24:16-17.

Doc. 147, at p. 42. That’s it. There is no mention of the Vroblick Letter. Respondent completely avoids it. And Respondent did not produce it.

178. In that same pleading from December 2025, Respondent writes:

It is just as likely that Vroblick eavesdropped and peppered her fabrication with legitimate details. [...]—if Vroblick and Corley were indeed cellmates or housed in proximity, it would not have been difficult for Vroblick to pick up a few nicknames and use them to give a veneer of authenticity to the Corley Letter.

Doc. 147, at p. 42-43.

179. Meanwhile, as he was writing this, Respondent was *sitting on the Vroblick Letter*, a letter that was in *Kittie Corley’s possession in her cell*, and that *confirmed* what Vroblick told Sgt. Luker. Respondent alone knew that this hidden evidence (the Vroblick Letter) went against what Respondent was stating to the Court. Respondent was alleging that Joan Vroblick may have been “eavesdropping,” when in fact Respondent was *not revealing evidence* which corroborated Vroblick’s statement to Sgt. Luker and suggested that Corley had told Joan Vroblick everything

already: “Hey, you have already told me the whole story & I have not said anything. Date it. Trust me.” Appendix A at Wilson Habeas 0088.

180. Joan Vroblick *did write* to Kittie Corley on August 5, 2004, five days before Corley wrote the Corley Letter, and Corley kept the Vroblick Letter in her possession for *practically two months*, until September 30, 2004, the day that Sgt. Luker seized it from her cell. *See* Doc. 76-24 at PDF 16, Bates 3857.

181. In other words, Respondent *reviewed* the Vroblick Letter *for a second time* in December 2025, after having unsealed it and reviewed it two years earlier in December 2023, and *again* determined that it was not discoverable and merely “an extensive fishing expedition far afield from the Corley Letter itself.” Doc. 147, at p. 48.

182. In his pleading from December 2025, Respondent recounted all kinds of sordid details about Joan Vroblick—*supported by 16 new documentary exhibits*. Respondent called Ms. Vroblick “a known forger, thief, and escapee.” Doc. 147, p. 41. Respondent supplied the Court with *sixteen* exhibits about Joan Vroblick, documenting how she supposedly “is one of the unluckiest people to ever live.” Doc. 147, p. 10. These include documents about Ms. Vroblick being a long-haul truck driver. Doc. 147-1. Documents about Ms. Vroblick writing to the Coffee County District Attorney and to Judge Steensland. Doc. 147-2. Documents about Ms. Vroblick offering to take a polygraph test. Doc. 147-2. Documents about Ms.

Vroblick being indicted in Houston County, Covington County, Dale County, Coffee-Enterprise County, and Wilcox County. *See* Doc. 147-4; Doc. 147-5; Doc. 147-6; Doc. 147-7; Doc. 147-8. Documents about Ms. Vroblick's time in community corrections. Doc. 147-9. Documents about Ms. Vroblick having holds in Pennsylvania and Oklahoma. Doc. 147-10. Documents about Ms. Vroblick escaping from work release, charged with escape, but claiming not to have escaped. Doc. 147-11 through Doc. 147-13. Documents about Ms. Vroblick being convicted of escape in the third degree and sentenced to 10 years of imprisonment. Doc. 147-14. Documents about Ms. Vroblick being put under guardianship in 2018 (Doc. 147-16) and pleading guilty to negotiating a worthless instrument (Doc. 147-15).

183. The one and only relevant piece of evidence about Vroblick that Respondent seemed to want to hide is the Vroblick Letter.

184. Moreover, Respondent provided this Court with an affidavit of Kittie Corley after conducting an interrogation of Corley at her place of detention in 2023. But Respondent *did not confront* Corley with the Vroblick Letter, *did not mention* the Vroblick Letter to Corley, and *did not inform* this Court about the Vroblick Letter, which was obviously relevant to the question at hand.

185. The *only reason* that Petitioner and this Court have the Vroblick Letter now is because this Court granted Petitioner *access* to the Corley writing samples file, ordered Respondent to *turn over* all the Corley writing samples, and *did not*

simply allow Respondent to review and exercise its discretion. If the Court had not ordered access to the Corley writing samples, Petitioner and this Court still would not have the Vroblick Letter.

B. The Reaper Poem

186. The same goes for the Reaper Poem, which was also in the Corley writing samples. The Reaper Poem directly corroborates Petitioner David Wilson's claim, during his police interrogation, that Kittie Corley "got in some weird cult thing." *See supra* ¶ 29, item #3. The Reaper Poem is relevant material evidence.

187. There is no reason to believe, however, that the Reaper Poem would have seen the light of day if this Court had not granted Petitioner *access* and directed Respondent to "turn over" the Corley writing samples without exercising their own independent discretion.

188. Given the previous track record wherein Respondent denied the relevance of the front side and the back side of the Corley Letter (*see* Docs. 136 and 149), and given the new revelations concerning the Vroblick Letter, the Reaper Poem, and the other Corley writing samples discussed in Part I, Petitioner should be given access to the law enforcement files in the Walker and Hatfield murder cases, even if on a more limited basis.

C. Limited Access Is Necessary in a Case Like This

189. This Court should allow Petitioner limited access to certain law enforcement records in the Walker and Hatfield murders, *see infra* Part IV, Section D, to determine if there is relevant material evidence, or in the alternative, this Court should conduct an *in camera* review of the files and share any relevant evidence.

190. Access to and review of law enforcement files are measures that a federal court can order under the discretionary standard of Rule 6 of the Habeas Rules and *Bracy v. Gramley*, 520 U.S. 899 (1997). Rule 6(a) of the Habeas Rules states that a judge may authorize a party to conduct discovery under the Federal Rules of Civil Procedure for good cause. The Eleventh Circuit has held that “good cause” is demonstrated “where specific allegations...show reason to believe that the petitioner may, if the facts are fully developed, be able to demonstrate that he is...entitled to relief.” *Daniel v. Comm’r, Ala. Dep’t of Corr.*, 822 F.3d 1248, 1281 (11th Cir. 2016) (quoting *Bracy v. Gramley*, 520 U.S. 899, 904 (1997)). This Court has found that there is “good cause” for discovery in Petitioner’s case. Docs. 67, 79, and 151.

191. The scope and extent of discovery is a matter that rests in the hands of the District Court. The Supreme Court has held that “Rule 6(a) makes it clear that *the scope and extent* of such discovery is a matter confided to the *discretion* of the District Court.” *Bracy*, 520 U.S. at 909 (emphasis added). The flexible nature of the

writ of habeas corpus allows the courts to “fashion appropriate modes of procedure” to determine facts; indeed, “[w]here their duties require it, this is the inescapable obligation of the courts.” *Harris v. Nelson*, 394 U.S. 286, 299 (1969). In other words, liberal discovery is appropriate at the discretion of the District Court. The AEDPA has not limited “fact-developing techniques” for “proving factual allegations through evidence generated with the aid of financial assistance, discovery, and other investigative measures.” Randy Hertz & James S. Liebman, *Federal Habeas Corpus Practice and Procedure* (FHCPP), 7th Edition, § 19.4[a], n.4 (Matthew Bender); see also *Payne v. Bell*, 89 F. Supp. 2d 967, 971 (W.D. Tenn. 2000) (citing Hertz & Liebman, FHCPP).

192. Moreover, liberal discovery is especially appropriate in capital cases because the stakes for petitioners are so high. See *Lockett v. Ohio*, 438 U.S. 586, 604 (1978) (noting that “‘the penalty of death is qualitatively different’ from any other sentence.... this qualitative difference between death and other penalties calls for a greater degree of reliability when the death sentence is imposed.”) (quoting *Woodson v. North Carolina*, 428 U.S. 280, 305 (1976)); *Ex parte Monk*, 557 So. 2d 832, 836–37 (Ala. 1989) (the “hovering death penalty is the special circumstance justifying broader discovery in capital cases”).

193. In fact, an important follow-up *Brady* decision from the United States Supreme Court, *Strickler v. Greene*, 527 U.S. 263 (1999), involved a case where the

District Court had issued an order granting Petitioner the right to examine and copy all of the police and prosecution files. As the Supreme Court noted in its opinion, “The District Court entered a sealed, *ex parte* order granting petitioner’s counsel the right to examine and to copy all of the police and prosecution files in the case.” *Strickler*, 527 U.S. at 278. It was as a result of that access order that Petitioner there discovered material evidence that the prosecution had suppressed. “That order,” the Court noted, “led to petitioner’s counsel’s first examination of the Stolfus materials.” *Id.*

194. State and federal courts have granted petitioners access to law enforcement files when faced with a *Brady* claim. *See Ex parte Monk*, 557 So. 2d at 833–34 (affirming circuit court’s order for open file discovery in a capital case, i.e., allowing the defendant “full and complete access to file materials...in possession of the state, any agent or agency of the state, or any police agency involved in this case...”); *Strickler*, 527 U.S. at 278; *Lewis v. Comm’r of Corr.*, 2013 U.S. Dist. LEXIS 49155, *6-7 (D. Conn. 2013) (HAIGHT, Charles S. Jr., Judge) (referencing open file discovery). The broad discretion granted to District Courts by Rule 6(a) and Supreme Court precedent, the life-and-death stakes of a capital case, and the inherent information asymmetry between the prosecution and defense in *Brady* claims, all support the grant of liberal discovery in a case like this one, where Respondent has failed to exercise his discretion properly as evidenced by the Corley

writing samples. As Justice Fortas wrote in his concurring opinion in *Giles v. Maryland*, 386 U.S. 66, 98 (1966), “The State’s obligation is not to convict, but to see that, so far as possible, truth emerges....No respectable interest of the State is served by its concealment of information which is material, generously conceived, to the case, including all possible defenses.”

D. Reasonable Limits on Access

195. Petitioner does not request unfettered and unsupervised “open access” to *all* the law enforcement records. He is only asking for access limited to certain records.

196. As a result of the mandatory May 20, 2026, productions of the Reaper Poem and the Corley Bible Verses, and the further discovery of the mitigation specialist Joy Crawford’s extensive research on “Wicca” witchcraft, Petitioner believes that Corley’s defense attorneys intended to present a witchcraft mental health defense at Kittie Corley’s capital trial.³ A review of the fee sheet of Corley’s defense attorney, Billy Joe Sheffield, tends to corroborate this hypothesis. Sheffield spent over 23 hours in consultation with the mitigation expert Joy Crawford who was investigating witchcraft. *See* Appendix O (fee petition of Billy Joe Sheffield).

³ Kittie Corley did not ultimately go to trial. Corley negotiated a plea agreement in which, interestingly, she was not called as a witness at David Wilson’s capital murder trial.

This suggests that there may be more state's evidence of Corley's involvement in cult witchcraft.

197. The most likely place where there may be evidence concerning Corley's involvement in cult practices and in the murders of Dewey Walker and C.J. Hatfield would be in District Attorney Doug Valeska's files related to the investigations and prosecution of Kittie Corley.

198. For this reason, Petitioner respectfully requests, at a minimum, that he be allowed access to law enforcement records limited to:

- a. the Houston Country District Attorney's files on the Walker murder, especially the files related to the Kittie Corley prosecution; and
- b. the Henry County District Attorney's files on the Hatfield murder.

E. As an Alternative, Petitioner Requests In Camera Review

199. In the alternative, Petitioner requests that this Court review *in camera* the limited set of law enforcement files specified in Part IV, Section D, ¶ 198 *supra*.

200. The fact is, there are many missing pieces of evidence concerning Kittie Corley. In addition to the documents requested in Part III, Respondent has not located the transcript of the March 24, 2005, interrogation of Kittie Corey (Doc. 156 at p. 3); the recordings or transcripts of the other Corey interrogations by Henry County investigator Alan Hendrickson (Doc. 156 at p. 3); or recordings or transcripts of the interrogations of Joan Vroblick or Erica Nicole Gray discussing Kittie Corley

(Doc. 156 at p. 6). This does not seem normal for a capital murder investigation, especially one in which the ABI was involved. Given the missing evidence, Petitioner would respectfully request that, as an alternative, the Court conduct its own *in camera* review or direct Respondent to show cause why there are so many missing pieces of evidence relevant to Kittie Corley.

WHEREFORE, Petitioner requests that the Court direct Respondent to review additional law enforcement agencies and to produce additional evidence, and that the Court reconsider its order denying Petitioner access to the law enforcement files in the Walker and Hatfield murder investigations. More specifically, Petitioner requests that the Court grant the following discovery:

(1) Respondent review and produce relevant evidence from the files of:

- (a) the Abbeville Police Department;
- (b) the Houston County Sheriff's Office regarding the Hatfield investigation;
- (c) the Headland Police Department; and
- (d) the Florida Jackson County Sheriff's Department.

(2) Respondent produce the following evidence:

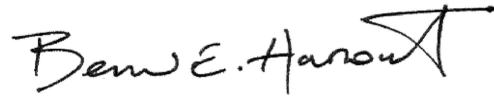
- (a) the other police interrogation of John Edward Parmer;
- (b) the police interrogation of Scott "Bam Bam" Mathis;

- (c) the other police interrogation(s) of Mark Hammond;
 - (d) the police interrogation of Joan Vroblick on August 8, 2004;
 - (e) the other police interviews of Erica Nicole Gray;
 - (f) the “Script” written by Sarah Drescher; and
 - (g) the police interrogation of Sarah Drescher.
- (3) Alternatively, the Court permit Petitioner to depose:
- (a) John Parmer;
 - (b) Mark Hammond; and
 - (c) Scott “Bam Bam” Mathis.
- (4) And the Court reconsider and grant Petitioner access to, or conduct its own *in camera* review of, the law enforcement files, limited to:
- (a) the Houston Country District Attorney’s files on the Walker murder, especially the files related to the Kittie Corley prosecution; and
 - (b) the Henry County District Attorney’s files on the Hatfield murder.

This discovery is necessary before Petitioner can properly amend his petition for habeas corpus in light of the new evidence produced on May 20, 2026.

Dated this 20th day of July, 2026.

Respectfully submitted,

A handwritten signature in black ink, reading "Bernard E. Harcourt". The signature is stylized with a large, sweeping "B" and a distinctive flourish at the end.

BERNARD E. HARCOURT
Alabama Bar No. ASB-4316A31B

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TABLE OF APPENDICES

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- Appendix B:** Audio of the interrogation of Heather Lynn Brown on January 29, 2005, filed conventionally with the court via flash drive
- Appendix C:** Movie file of the interrogation of John Edward Parmer on March 3, 2005, filed conventionally with the court via flash drive
- Appendix D:** Transcription of the March 3, 2005 interrogation of John Edward Parmer
- Appendix E:** Audio of the second part of the police interrogation of Mark Hammond on February 26, 2005, filed conventionally with the court via flash drive
- Appendix F:** Audio recording of the interrogation of Kittie Corley on May 2, 2023, filed conventionally with the court via flash drive
- Appendix G:** Transcription of the Vroblick Letter from Respondent’s May 20, 2026 production
- Appendix H:** Transcription of the Reaper Poem from Respondent’s May 20, 2026 production
- Appendix I:** Fee sheet submitted by the mitigation expert for Kittie Corley’s defense team, Joy Crawford, for July to September 2007
- Appendix J:** Transcription of the Dear Phillip Letter from Respondent’s May 20, 2026 production
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- Appendix L:** Transcription of the Dear Travis Letter from Respondent’s May 20, 2026 production

Appendix M: Transcription of the Corley Inmate Request Form from Respondent's May 20, 2026 production

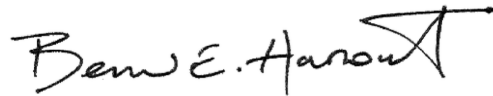
Appendix N: Transcription of the Kittie Corley Bible Verses from Respondent's May 20, 2026 production.

Appendix O: Fee Petition of Billy Joe Sheffield, Kittie Corley's Attorney.

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2026, the foregoing has been electronically filed with the Clerk of the Court and therefore a copy has been electronically served upon counsel for Respondent:

Lauren Simpson, Esq.
Office of the Attorney General
Capital Litigation Division
501 Washington Avenue
Montgomery, AL 36130

A handwritten signature in black ink, reading "Bernard E. Harcourt". The signature is stylized with a large, sweeping "B" and a distinctive flourish at the end.

Bernard E. Harcourt
Counsel for David Phillip Wilson