

# INTAKE QUESTIONNAIRE

Center on Wrongful Convictions ♦ Northwestern University School of Law  
375 East Chicago Avenue ♦ Chicago, Illinois 60611

*This questionnaire is used for the sole purpose of assessing claims of actual innocence. Please answer the questions in detail; use additional sheets if necessary. Please do not send any documents unless requested, and if requested send only copies of the documents requested, not originals. We will advise you when we have completed our review of your case. Although we will accept additional materials during the course of our review, we may not be able to respond to interim requests for updates or status reports regarding our review.*

Name: Steph Turner Date of Birth: 12/20/1962

Inmate #: 235530 Parole or release date: 9/22/2005

Current Correctional Facility and Address:

417 6<sup>th</sup> Street, #1, Rochester MI 48307

Gender: MTF genderqueer Race: Native American / Caucasian

Primary Language: English Court you were convicted in:  Juvenile  Adult

Your age at the time of the crime: 30

Crimes you were convicted of:

- Murder
- Attempted murder
- Sexual assault/rape
- Burglary
- Robbery
- Sexual assault of a minor
- Arson
- Other: \_\_\_\_\_

Was DNA recovered?  Yes  No

State, county and city of conviction: Michigan, Kent County, Grand Rapids

Date of conviction(s): 12/13/1993

Charge(s): CSC 2; Aiding & Abetting CSC 1

Indictment #(s): CSC 2; Aiding & Abetting CSC 1

Crime(s) convicted of: CSC 2; Aiding & Abetting CSC 1

Sentence(s): CSC 2 count: 10-15 years; CSC 1 A&A count: 15 to 30 (later resentenced to 8-15 years)

If more than one sentence, are they:  Concurrent  Consecutive

Personal Information

Number of years of formal education: 16 at the time; 8 more since and continuing

Did you have special education needs?  Yes  No

**If yes, please describe your needs and how they were addressed:**

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Have you ever had mental health treatment?  Yes  No

**If yes, please describe the treatment and the reason for the treatment:**

Sex Offender Group Therapy, as condition for parole eligibility (attended from summer 2000 to summer 2001)

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Do you have an on-going physical illness or disability?  Yes  No

**If yes, please describe your condition:**

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Attorneys

Are you currently represented by counsel:  Yes  No

**If yes, provide the name, address and telephone # of your current attorney:**

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Please provide the name(s) and contact information (if available) of your trial attorney:

Tonya Krause-Phelan krausept@cooley.edu (currently a law professor at Cooley Law School, Grand Rapids MI)

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Please provide the names and contact information for all other attorneys who have worked on your case:

Robert F. Mirque, Jr., codefendant's counsel 5300 Corporate Grove Dr SE #350, Grand Rapids, MI 49512; (616) 233-9300

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Have you contacted other wrongful conviction projects?  Yes  No

If yes, which ones, and what responses did you receive?

However, I did submit a summary of my story to Justice Denied earlier this year. \_\_\_\_\_

**Crime Information**

Date of alleged crime (include time of day if possible): 7/7/1993

Location of the crime My then apartment in Grand Rapids

Name(s) of alleged victim(s): Lakeysha Carmala Cage

Race of alleged victim(s): black

Age(s) of alleged victims(s): 10

Did you know the alleged victim(s)?  Yes  No

If yes, how did you know the victim(s)?

\_\_\_\_\_

If yes, how well did you know the victim(s)?

\_\_\_\_\_

Did the alleged victim(s) identify you as the person who committed the crime?  Yes  No

If yes, when and how? (Example: at the scene of the crime, line-up, photograph identification, in court, other)

At scene of alleged crime when interviewed by attending officers, and later in court. Not as principal but as alleged aider and abettor.

\_\_\_\_\_

Did anyone else identify you as the person who committed the crime?  Yes  No

If yes, who, when and how?

\_\_\_\_\_

Were you identified in a police line-up?  Yes  No

Were you identified in a photo array?  Yes  No

If you appeared in a police line-up, describe the circumstances:

\_\_\_\_\_

Were you present at the scene of the crime before, during, or after it occurred?  Yes  No



If yes, explain:

Names of the police officers who investigated the crime:

Mike Barr & Paul Mesman 1<sup>st</sup> at scene, then Joe Sirard and Sergeant Pam Carrier: Vazquez, Karpowicz, CJT Reed

If you were not at the scene, can you recall where you were and what you were doing when the crime occurred?

No crime occurred. I was in my bedroom asleep and awoke to hear codefendant converse with complainant, whom I had never met before. After getting up, I left the apartment and when returned a half hour later the complainant was gone.

### Arrest

Date of your arrest: 7/7/1993

Place of arrest (location, city, county, state): 4130 Oak Park SE, #204, Grand Rapids, Michigan

Was anyone else arrested for the crime? Yes

If yes, please provide their names:

Janet Turner, my transgender sister, whose legal name remained DANIEL TURNER. Janet was initially the only one accused.

How did you become a suspect?

Complainant identified me as being in apartment, which I shared with codefendant who was the principally accused.

Complainant accuses me of helping codefendant molest her and of posing with her in an alleged Polaroid photo to ostensibly scare her into not reporting the alleged event.

Did the police interview you before you were arrested?  Yes  No

If yes, how many times were you interviewed before you were arrested?

NOTE: I was asked prior to being accused where I had been and replied, "I was asleep in my bedroom and just got up."

Did you speak to the police without a lawyer present?  Yes  No

If yes, was the interrogation electronically recorded?  Yes  No

Did you make a statement  Yes  No

Did you confess to the crime?  Yes  No

If applicable, explain why you gave a statement and briefly describe what you told the police:

Was offered to prove my innocence by volunteering to take a polygraph exam, and was told I must give a statement as a baseline for the polygraph examiner. This occurred on 9/15/1993, two months after the alleged incident. I gave my version of events, of getting up to hear my sister talking with someone, getting up to check it out, was ignored by both and returned to my bedroom, then shortly after I left the apartment. I returned a half hour later, finding my sister not willing to talk about who that was. Minutes later the complainant's mother pounds on door and accuses my sister of "fucking with" her daughter.

**Conviction**

Did you plead guilty?

Yes  No

If yes, why?

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Did you try to withdraw your plea? N/A

Yes  No

If not, why not?

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Were others charged in connection with this crime?

Yes  No

If yes, names of those charged: (only one codefendant)

**Co-defendant 1:**

Name: Janet Turner: legal name DANIEL A. E. TURNER

Age: 35

Same Trial but separate jury

Separate Trial

Took Plea Deal

**Co-defendant 2:**

Name: \_\_\_\_\_

Age: \_\_\_\_\_

Same Trial

Separate Trial

Took Plea Deal

**Co-defendant 3:**

Name: \_\_\_\_\_

Age: \_\_\_\_\_

Same Trial

Separate Trial

Took Plea Deal

*(If there are more co-defendants please provide the same information on a separate sheet of paper)*

Did you know the co-defendants prior to the crime?

Yes  No

If yes, how did you know them and how well did you know them?

Janet Turner (DANIEL TURNER) was my sibling, grew up as brothers but starting to relate as sisters.

Do you know if the co-defendants also claim innocence?  Yes  No

Do you claim to be innocent of all of the above charges?  Yes  No

If not, which charges are you innocent of? \_\_\_\_\_

Do you know who committed the crime(s) of which you are convicted? N/A  Yes  No

If yes, who? How do you know this person is the real perpetrator?

No crime actually occurred: sex abuse hysteria in transphobic climate

Trial

Did you have a:

Jury Trial  Bench Trial  Military Trial

If you had multiple trials, how many? And what was the reason for the outcome of each trial?

Only one trial with different juries, one for each codefendant.

Case # 93-63014-FCB

Prosecuting attorney's name: Kevin Bramble

Trial judge's name: Dennis C. Kolenda

According to the prosecutor/police, how many people committed the crime? two: principal & me as aider & abettor

Did your attorney argue any of the following: alibi, mistaken ID, false confession, battered woman syndrome, DNA, or self-defense?

No, merely tried to debunk every assertion of prosecution to convince jury I had no criminal involvement

Did you have an alibi?  Yes  No

[Actually, I greeted a neighbor at my old apt, but no longer recall his name; technically, codefendant's alibi for each other]

If yes, please explain:

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If yes, can/did anyone substantiate your alibi? N/A  Yes  No

If yes, please provide a name and last known whereabouts:

Did you testify on your own behalf?  Yes  No

If not, why didn't you testify?

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Did the alleged victim(s) testify?  Yes  No

If yes, please provide their names and possible locations:

Lakeysha Marble Cage; currently residing in the Muskegon MI county jail on her 4th drug offense according to an article I found online (Marble was her step father's last name)

Did any of the eyewitnesses testify in your defense?  Yes  No

If yes, please provide their names:

With the possible exception of helpful testimony elicited on cross examination of prosecutor witnesses

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Did any eyewitnesses testify against you?  Yes  No

If yes, please provide their names:

India Harris (complainant's play companion), Laura Lee VanGenderen, Cynthia Marble (complainant's mother), Judy Dixon, Jeana Lanetta Scott, Carmen Garcia, Joel Kusmierz

What experts (doctor, psychiatrist, criminalist, scientist, etc.) testified for the prosecution? Please provide names and contact information if possible:

Dr. Steven Perry, RN Leslie Vandenhout, RN Ruth Hamstra, Dr. Edward Cox, CST Karen Curtiss, state crime lab tech Robert Birr, counselor Patricia Ann Haist

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What experts testified for the defense? Please provide names and contact information if possible:

None. Defense council strategy was to debunk all those called by prosecution, since there was nothing of substance in any of their trial testimonies since no crime actually occurred



Did any police informants (snitches) testify against you at trial?  Yes  No

If yes, please provide names: \_\_\_\_\_

Did they claim to have learned information about your case from you while you were in jail? N/A  Yes  No

Did they claim to have learned information about your case from you before you were arrested? N/A  Yes  No

Did an alleged accomplice testify against you?  Yes  No  
If yes, what did he/she testify to?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please list other witnesses and what they testified to:

India Harris: to being with complainant shortly after leaving our apt, after the alleged incident

Laura Lee VanGenderen: witnessing Cynthia & Larry Marble confront codefendant in front of our apt

Cynthia Marble (complainant's mother): finding complainant after alleged incident, then confronting codefendant

Judy Dixon: seeing Cynthia & Larry Marble confront codefendant from her vantage point across the street

Jeana Lanetta Scott: seeing along with Dixon both Cynthia & Larry Marble confront codefendant in front of our apt

Carmen Garcia: interacting with complainant & India about 10 minutes prior to Cynthia confronting codefendant

Did anyone who testified against you, including the alleged victim, have a reason to lie?  Yes  No

If yes, please explain:

Complainant was in trouble for not being home when her mother arrived home from work, and upon demanding angrily where she had been the complainant claimed to be dragged into our apartment by my transgender sister. Others appeared motivated to help the prosecutor's theory, such as adjusting their originally provided timeline.

Evidence

Was there DNA evidence or other physical evidence in your case?  Yes  No

If yes, what was the evidence?

Spermatozoa recovered from a green blanket, seminal fluid from a comforter and from a shirt; body fluid samples; film/photos, butter knife; tissue; computer disks

Was testing done on the evidence?  Yes  No

If yes, what kind?

Rape kit w/o pelvic exam; Woods light; two physical exams of complainant; clothing swatches for presence of makeup, hairs, saliva, semen, jelly; **no DNA testing performed**



What were the results of the testing?

Bedroom blanket & sleeping bag: presence of seminal fluid; Codefendant shirt found in LR: presence of seminal fluid;

Complainant's shirt: lipstick stain, jelly stain. No other findings.

Were the results used at trial?

Yes  No

If no, why not?

Do you know what lab or individual conducted the testing?

Yes  No

If yes, please provide name and contact information if possible:

Robert Birr, Michigan State Police Regional Crime Laboratory, Grand Rapids, Michigan. (likely retired)

Appeal

Have you filed your direct appeal:

Yes  No

Case #: 173814 & 172928

Date filed: 12/27/1995

Pending:

Yes  No

If no, date decided: 1/7/1998

Issues raised on appeal:

Too many to list here: 9 total. First 8 raised fair trial issues, the last one raised a sentencing issue. The 60 page appeal brief takes a page and half to list all nine issues. See attached list below.

Have you appealed to the State Supreme Court:

Yes  No

Case #: I don't have the assigned number

Date filed 5/13/1998

Pending:

Yes  No

If no, date decided: I cannot find any copy of the results, but know I was denied a hearing

Issues raised on appeal:

Six of the eight issues, #3 through #8, raised at the Appellate Court level

Have you filed a state post-conviction or habeas petition:

Yes  No

Case #:

Date filed:

Pending:

N/A  Yes  No

## **Brief on Appeal**

1. Mr. Turner was denied his federal constitutional right to due process of law when the trial judge denied his motion for directed verdict of acquittal on the charge of first degree criminal sexual conduct; in the alternative, the verdict is against the great weight of the evidence.

2. Manifest reversible error occurred when the trial judge instructed the jury that defendant could be convicted of aiding and abetting first degree criminal sexual conduct if he did something to help the principal "at least temporarily avoid detection."

3. Clear reversible error occurred when the trial judge failed to instruct the jury that it must be unanimous as to a theory of the principal's guilt before it could find Mr. Turner guilty as an aider and abettor.

4. Mr. Turner was denied his right to a fair trial when the trial court introduced rape trauma syndrome testimony over defendant's objection, where the issue of the child victim's reaction to the assault was not injected by defendant, and where the witness testified that the victim was in fact assaulted.

5. Manifest reversible error occurred when the trial court admitted damaging hearsay testimony over defense objection.

6. Mr. Turner was denied his right to a fair trial when the trial judge gave a circular instruction on the intent required for aiding and abetting which failed to convey to the jury that the accessory must assist the principal with knowledge of the crime intended by the principal.

7. Mr. Turner was denied his right to a fair trial when the trial judge failed to instruct the jury that the assistance offered by defendant must have had the effect of inducing the crime.

8. Mr. Turner was denied his right to a fair trial when the prosecutor argued to the jury that they had a civic duty to believe the testimony of the complaining witness.

9. Mr. Turner should be resentenced because the trial judge abused his discretion in imposing an excessively severe sentence of 15 to 30 years imprisonment, where the guidelines range was 60 to 120 months, and where the judge relied upon a reason for departure which violated the Michigan Supreme Court's decision in In Re Dana Jenkins.

## **Relief Requested**

Defendant-Appellant respectfully requests that this Honorable Court reverse his conviction for first degree criminal sexual conduct, discharge him from the offense and remand the case for a new trial on the remaining charge for second degree criminal sexual conduct; in the alternative, Defendant requests that this Court reverse his convictions and remand this case for a new trial; in the alternative, Defendant requests that this Court remand this case for resentencing.

If no, date decided: N/A

Issues raised on appeal:

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Have you filed a federal habeas petition:

Yes  No

Case #: \_\_\_\_\_

Date filed: \_\_\_\_\_

Pending:

N/A  Yes  No

If no, date decided: \_\_\_\_\_

Issues raised on appeal:

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Have you filed any other post-conviction petitions, habeas corpus petitions, or petitions for clemency?

Yes  No

If yes, please provide petition type, Case #, Date filed and Date decided, as well as all issues raised:

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**Post-conviction evidence**

*(What NEW evidence exists that you think could prove your innocence)*

Has any victim or witness who testified against you at your trial recanted his or her testimony?

At least not that I'm aware of  Yes  No

If yes, who? And describe how the story changed

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If yes, is there an existing affidavit, letter, or written statement of the recantation?  Yes  No

Has any other way to prove your innocence developed after your trial (for example, has someone else confessed to the crime?)  Yes  No

If yes, please describe:

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If there has been a confession, is there an existing affidavit, letter, or written statement of the confession?  Yes  No

Since your conviction has any additional testing been done on the physical/biological evidence?  Yes  No

If yes, what kind of testing, by whom and when? Have you used these results in any court filings?

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Do you know whether any physical evidence is still available for testing?  Not sure  Yes  No

If yes, what is it, where is it, who has it?

According to the jury trial transcript (583:8-17), a sample for DNA testing was stored in frozen storage back in 1993

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If no, did you ever receive a destruction of evidence notice?  Yes  No

If yes, on what date? \_\_\_\_\_

Would you be willing to submit to a DNA test, knowing that the test could confirm your guilt or innocence in this case and potentially other cases?  Yes  No

Is there anything else you think could help us prove your innocence?

Investigation into the types of leading questions standard at the time, which could help account for evolving embellishments into complainant's graphic allegations. Identifying this case's elements of "sex abuse hysteria" and its intersection with transphobic attitudes at the time within a religiously conservative community. My three daughters corroborating that I never sexually abused them. Prima facie demonstration of evidence corroborating our innocence, with seminal residues in our bedding/clothing from our wet dreams since complainant revealed no presence of seminal fluids or any evidence of sexual abuse at the time. Exploring probable means for complainant being aware of paraphilias I've never even heard of.

#### Case Materials

**Do not send any materials now, but please check those documents that you can make available to us:**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Hearing transcripts   | <input checked="" type="checkbox"/> Laboratory reports          |
| <input checked="" type="checkbox"/> Trial transcripts   | <input checked="" type="checkbox"/> Witness statements          |
| <input checked="" type="checkbox"/> Police reports  | <input checked="" type="checkbox"/> Probation/sentencing report |
| <input checked="" type="checkbox"/> Other discovery documents: <u>rape kit exam notes &amp; report, search warrant &amp; items taken, press articles (to show transphobic &amp; sex hysteria climate)</u> |   |

Appellate Documents:

Appellant  
(defense)

Respondent  
(prosecution)

Opinion  
(decision)



If these materials are in the possession of a relative or friend, may we contact them:  Yes  No

If yes, please provide the name, address, and telephone number of this person:

These items are available online (most as searchable PDFs) at: http://www.transvalu.com/#!/documentation/c1dcv

(If prompted for a password, please enter: 930707)

**Criminal History**

Before you were convicted of this crime had you ever been convicted of a felony?

Yes  No

If yes, please list all previous felonies you have been convicted of and the year you were convicted:

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Please list any misdemeanors you have been convicted of and the year you were convicted:

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**Other**

Were you employed at the time of your arrest?  Yes  No

If yes, please provide the employer's name and contact information:

Cascade Engineering, 3400 Innovation Court SE, Grand Rapids, MI 49512. (616) 975-4800

Please provide the names and contact information of family and friends who might have information regarding your case:

Alisha Turner; violet50rose@yahoo.com (my then wife, still friends)

I can be reached by email as well: steph\_d\_turner@yahoo.com.

Do we have permission to contact these persons?  Yes  No

If no, why not:

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## Narrative

In your own words, please give us a detailed explanation of the events from the day of the crime until you were charged (include additional pages if necessary).

\_\_\_\_\_ Lakeysha (a 10-yr-old girl from apt #212) peeks into our apartment window at #204, to gawk again at Janet, my transgender apartment mate. Janet is sitting at her Atari computer in the living room. As she had the night before, Lakeysha stares at Janet as "a man with lipstick," while I'm still asleep in back bedroom since I work nights. This is shortly after 3:00 p.m., the hottest part of the day. Because our A/C was not working, Janet left the front window blinds open and the front door ajar on this hot July day, as she had the night before.

\_\_\_\_\_ Annoyed by her intrusiveness, but keeping true to her Native American spirituality not to "vex children," Janet lets Lakeysha into the apartment to placate her curiosity. Lakeysha indicated to Janet she's bored. They strike up a conversation. Janet invites Lakeysha to try her computer games. Their conversation turns to clothing.

\_\_\_\_\_ Janet shows Lakeysha some of her cloths, lets Lakeysha try some on. Janet's clothes closet is just outside of my bedroom, and their conversation wakes me up about 4:00 p.m. Not wanting any strangers in our apartment, I am irritated with Janet for not first consulting me about having this unknown guest.

\_\_\_\_\_ As Janet shows Lakeysha her clothes closet, I open the bedroom door to go the fridge in the kitchen for a cool drink of water, and to see who Janet is talking with. My discomfort increases as I see this strange girl disrobe her top and try on a top Janet hands to her. I return to my bedroom and close the door, pondering what I should do.

\_\_\_\_\_ I consider calling my wife, since I have a line phone in my bedroom. I feel a need to someone to talk about this unwelcomed guest Janet has in my apartment. Instead of calling, I decide to talk to her in person since she lives a half mile down the road. And to retrieve the car we share so I can get to work that night. About 20 minutes after returning to my bedroom, I leave it again.

\_\_\_\_\_ As I step out of the bedroom I see this young girl sitting on Janet's lap at the Atari computer station in the living room. As before, neither acknowledge my presence as I pass behind them and out the front door at about 4:30 p.m. According to Janet's later statement, she shows Lakeysha her video strip poker game, but insists the game is too challenging for almost anyone to win and see the computer generated figures bare all.

\_\_\_\_\_ Still feeling irate and ignored, I leave the apartment and start walking to my estranged wife's apartment. It takes me about ten minutes to get there. But I find my wife is not home, so I walk to the local Post Office to check my mail, another ten minute walk. After checking my mail I head back to the apartment, another ten minute segment in this triangular shaped trek.

\_\_\_\_\_ Upon returning to the Oak Park apartment a half hour later, about 5:00 p.m., I find Lakeysha is gone. So I asked Janet who that was. She tersely replied, "Keysha, or something like that." Seeming upset and not ready to talk about it just then, I let it go with the expectation of bringing it up later.

\_\_\_\_\_ In the meantime, I brew a pot of tea, this time not as strong as the first attempt the night before. Janet commented how it did turn out better than yesterday's attempt.

Some minutes later, shortly after 5:30 p.m., we hear a knock on the door. Janet goes to answer it and steps out onto the balcony in front of our apartment. She is confronted by a woman angrily demanding to know, "Why did you mess with my daughter? What were you doing fucking with my daughter?" 13

Janet goes down on one knee to placate her alarm, replying, "I don't know, I don't know why I did it, let me explain."

Just then I hear someone running along the balcony getting closer to our apartment. Janet then quickly leaps back into our apartment as a tire iron is being thrust at her and barely misses her head. I quickly shut the door and lock out the assailant.

The man continues to beat our apartment door with his tire iron while the woman hysterically shouts, "Call the police, someone call the police!"

As we stand in the living room trying to make sense of it all, I turn to Janet and say, "If she doesn't call the police, I will."

Janet nods, and I go to my phone in the back bedroom and call 911. I jot down the date and time of the call on a post-it note: "19930707.1743" for 5:43 p.m. Later I would learn I was the third in about eight 911 calls for this incident.

Some minutes later two officers show up. One of them orders the man to drop the crowbar, which he does. One of the officers then knocks on our door, and finally feeling safe we open and let him in.

He asks us to explain what happened. Not knowing when Janet first let this girl into the apartment and for what purpose, I simply replied, "I don't know, I just woke up." This was long before I had any clue I was going to be implicated as well.

Janet declined to give any statement, replying, "Just take me to jail."

"Why?" the officer asked. "Because of what the girl is saying," is how Janet replied. I sensed Janet thought she was only being accused of improperly touching the girl when helping her try on clothes, and perhaps any liabilities for having the girl disrobe to try on her clothes. That this I think was what she was acknowledging when admitting to the mother, "I don't know why, let me explain."

After asking if we agreed to a search of the apartment, we both declined without a search warrant. Then the officer asked us to sit in the back of the squad car, explaining it as a precaution in case we had access to any weapons in the apartment. We relented and were escorted to the back of the squad car.

To protect her rights, I asked Janet not to tell me anything. Janet was convinced she was going to be in jail for a while, so while sitting in the back of the squad car she asked me to find a letter for her once I was able to return to the apartment. The letter was in an orange folder, she explained to me, from the Institute for Psychosexual Health in Milwaukee. As I understood it, the letter would help her access appropriate care as an incarcerated transgender person.

We could see across the parking lot the girl being interviewed by other officers in the presence of her distraught mother. I asked the officer what the girl was saying and he replied that we must already know. Minutes later the officer told us we were both under arrest for CSC. I had to ask him what that meant. He explained it as he drove us off to the Kent County Jail.

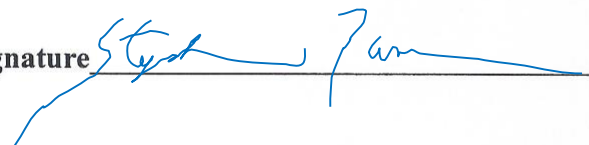
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The Center on Wrongful Convictions reviews cases for the sole purpose of assessing claims of actual innocence. The Center does not act as legal counsel to any person whose case is being reviewed, until and unless the Center, through its legal counsel or designees, specifically agrees in writing to take on such representation.



Authorization Form

I, Steph Turner, Inmate# 235530, authorize the Center on Wrongful Convictions to contact attorneys who presently are or previously were involved in my case. I further authorize those attorneys to release documents to and discuss my case, including privileged or confidential matters, with attorneys, students, and the staff of the Center on Wrongful Convictions.

Signature  Date 12/05/2014

If you are not the defendant, but assisted the defendant in completing this questionnaire, please provide your contact information and relationship to the defendant:

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**PLEASE RETURN THIS FORM WITH YOUR QUESTIONNAIRE TO:**

**CENTER ON WRONGFUL CONVICTIONS  
NORTHWESTERN UNIVERSITY SCHOOL OF LAW  
375 E. CHICAGO AVENUE  
CHICAGO, ILLINOIS 60611**