

# SNOW NOTES

## THE WRONGFUL CONVICTION OF JAMIE SNOW AND HOW THEY GOT AWAY WITH IT

### Kevin Schaal Perspective

#### Prior Charges:

1983: Home Invasion

1995: Delivery of Marijuana

October 1, 1997: Speeding on a Municipal Road

January 27, 1998: Driving Vehicle in Unsafe Condition, Driving While License Suspended

July 9, 1998: Cannabis/Paraphernalia, Driving While License Suspended

January 3, 1999: Possession of Cocaine

October 21, 1999: Felon in possession of a Firearm

November 23, 1999: Grand Theft

January 25, 2000: Evicted from Residence

### Interview with Defense Attorney Don Sorensen

#### June 9, 1999

Reported that Jamie never told him anything to lead him to believe he had any part in the murder, and that Jamie told small fibs to make himself feel like part of a group

### BPD Interview with Detective Katz

#### June 1999

Reported that he and Jamie were extremely close in prison. He said that Jamie told him he was serving time for keeping his mouth shut on a murder in which his friend committed, and hiding him in an attic. He supposedly discussed it with Jamie at least two dozen times. Jamie told him to get a hold of him when he got out. While they lived together, several people from Illinois came to visit, who he can't remember their names, they always talked about the murder. The first time Jamie admitted involvement with it was when he was personally implicated, and he was concerned he would spend life in prison for it because he was there.

### Kevin Shall Sentencing Motion, July 19, 2000

#### “Downward Departure from Sentencing Guidelines to Recognize the Defendant’s Substantial Assistance”

“Immediately after the defendant was charged on October 21, 1999, with being a felon in possession of a firearm the defendant and his attorney began their cooperation. The defendant’s co-defendant was charged in state court with burglaries and firearms possession and the defendant agreed to testify against his co-defendant if necessary. **The defendant was also contacted by State Attorneys from the state of Illinois regarding his testimony in a murder trial that will take place in the state of Illinois. The defendant has provided information valuable to the murder trial and has agreed to testify in that trial if called upon to do so.** The defendant has provided local law enforcement agents with information concerning burglaries that he and his co-defendant participated in and has been assisting them in solving some of the previously unsolved burglaries. The defendant has agreed to testify against those individuals and has agreed to testify in the state murder trial in the State of Illinois.

As a result of the defendant's cooperation, the United States respectfully requests that this Court depart below the defendant's minimum mandatory sentence of 15 years and reduce the defendant's guideline sentence by a range of two-levels. **Granting this motion would reward the defendant for his assistance to the United States and local law enforcement agencies and would be in the interest of justice.**"

**Snow Trial**  
**January 5, 2001**

**Direct Examination via Charles Reynard**

States he is residing at South Carolina federal correctional institute (p 154, lines 16-17).

Confirms prior convictions for home invasion in 1983, delivery of marijuana in 1995, and unlawful possession of a firearm by a felon in 2000 (p 154, lines 18-24 & p 155 lines 1-5).

Confirms that he was Jamie's cell mate in Centralia Correctional Center in 1996 (p 155, lines 23-24).

States Jamie did not tell him about a 1991 robbery and murder (p 155, lines 7-13).

Reynard asks him if Jamie told him about not ratting on someone to do with a murder, and Schaal insists Jamie did not mention a murder (p 156, lines 14-24).

Reynard questions him outside the presence of the jury to ask him why he told Detective Katz, himself, an ATF agent, and his own attorney that Jamie told him while they were cellmates, that he was doing time for keeping his mouth shut on a murder case. Schaal insists he must have been confused and denies the discussion of murder but confirms Jamie told him about hiding someone up in an attic. The judge allows Reynard to question him about this in front of the jury (p 158-161).

Reynard attempts to question Schaal about what he said in the recorded interview, but all he had were his own personal notes. He did not have anything transcribed. The Judge agrees with the defense that Schaal should not be questioned about this until the tape is transcribed on Monday, but he can ask him questions about other topics for now, and then recess (p 162-164).

Schaal states he had contact with Jamie after being released from prison and went to live with him in St. Petersburg, FL, and worked with him at a tree cutting service (p 166, lines 1-16).

States that there were visitors from IL at Jamie's house while he was there, specifically Troy, Stretch, and Jody (p 166, lines 17-24 & p 167 lines 1-4).

States said that the visitors would often return from IL and tell Jamie he was being investigated for murder, and Jamie was surprised and startled about it (p 167, lines 10-22).

Stated that Jamie confided in him that he was worried about the murder case being brought up after all this time, and he was very concerned about his children and his family. He said he told Jamie if he didn't do it, don't worry about it, and that he thought the visitors were using him to try to get out from under their own cases in IL (p 168).

He stated that in March or April of 1999, when Jamie found out detectives were coming to interview Jody, he sent his kids away. He said Jamie was concerned that people were using a ten-year-old case to get out of their own trouble, and it was escalating, and Jamie was concerned about how he was going to stop it. He stated that he told Jamie again that if he didn't do it, he shouldn't worry. He said Jamie said he was there, but he doesn't remember if he was talking about being there for the murder case or the hiding in the attic case, he wasn't sure what he was talking about (p 169-170).

Shaal confirms that his nickname is Colt (p 171, lines 15-16).

### **January 8, 2001**

#### **Direct Examination continued via Charles Reynard**

Shaal confirms that before his interview with Detective Katz, Charles Reynard, an ATF agent, and his attorney, defense investigator Cassagnoli interviewed him several days prior. He states he did not trust him and was partly truthful. He said he gave more details during the interview with authorities than with Cassagnoli (p 43).

Shaal confirms that last week he testified he had doubt if Jamie was referencing a homicide case during their discussions (p 44, lines 8-11).

Reynard reads the interview questions and responses where Shaal tells authorities that Jamie told him he was serving time for keeping his mouth shut on a murder in which his friend committed, and hiding him in an attic, and he supposedly discussed it with Jamie at least two dozen times (p 45 & 46).

Shaal responds by saying today he remembers the discussion to be about a robbery, not a murder, and it was discussed maybe seven or eight times (p 47, lines 3-15).

Reynard reads the interview questions and responses where Shaal tells authorities that he and Jamie were extremely close in prison, Jamie told him to get a hold of him in prison when he got out, and while they lived together, several people from Illinois came to visit, who he can't remember their names, they always talked about the murder, the first time Jamie admitted involvement with it was when he was personally implicated, and he was concerned he would spend life in prison for it because he was there. Shaal says he remembers making those statements (p 48-50).

#### **Cross Examination via Frank Picl**

Shaal admits that all the times Jamie supposedly discussed the murder investigation with him or others, they were smoking dope or drinking, including in their cell, and admits that men in prison tell stories to make themselves seem tougher (p 51 & p 52, lines 1-2).

Shaal confirms that Jamie never told him he shot Bill Little or anyone else (p 51, lines 9-14).

Shaal confirms that he did not contact authorities by phone since Jamie discussed hiding someone in an attic in Centralia Correctional Center or while in Saint Petersburg, FL (p 52, lines 23-24, & p 53, lines 1-10).

Shaal states he is pretty much an honest and truthful person (p 53, lines 11-13).

Shaal confirms he called defense investigator Don Sorensen on or around June 9, 2000 and told him that Jamie never told him anything to lead him to believe he had any part in the murder, and that Jamie told small fibs to make himself feel like part of a group (p 54, lines 1-18).

Shaal admits that it was his understanding the ATF agent who interviewed him with authorities would try to help him with his charges if he cooperated with the prosecution. He elaborated that he was awaiting at sentencing and his lawyer advised him to cooperate, as it would serve him good (p 54, lines 19-24 & p 55, & 56, lines 1-5).

Shaal admits he was drinking and using drugs during the conversations he had in Florida (p 56, lines 16-19).

Shaal admits that Jamie expressed concern that he was a suspect in something he didn't do in regard to the ongoing investigation (p 56, lines 20-24 & p 57, line 1).

Shaal confirms he met Ronnie Wright in Florida and he had a bad cocaine habit at the time (p 57, lines 21-24 & p 58, line 1).

Shaal confirms that Jamie was worried that the people who involved themselves in the investigation making statements against him (p 59, lines 1-6).

### **Redirect Examination via Charles Reynard**

Shaal confirms that Jamie was worried and concerned about the statements against him escalating, but not bragging (p 59, lines 13-21).

Shaal confirms that Jamie told him in private that he was worried he would spend the rest of his life serving time over the crime, and even after he told him not to worry if he didn't do it, Jamie continued to worry (p 60).

Shaal claimed Jamie never explained what he meant when he said, "I was there" (p 61, lines 1-3).

Shaal confirmed that Reynard never made him any promises or guarantees in return for his compliance and that the information would be conveyed to his sentencing judge, and that he is telling the truth today (p 62, lines 3-16).

### **Recross Examination via Frank Piel**

Shaal confirms that Jamie only became increasingly worried about the investigation when more and more people started to make false statements against him (p 62, lines 22-24 & p 63, lines 1-11).

Shaal confirms that Jamie did not say he shot anyone (p 63, lines 12-15).

Shaal admits he only became truthful with the prosecution when it was made clear his cooperation would be relayed to his sentencing judge, and he confirms it was mentioned to the judge during his sentencing (p 64, lines 1-13).

### **Redirect Examination via Charles Reynard**

Shaal confirms that Jamie told him his only involvement in the crime was helping a friend hide in an attic, until he told him he was there (p 65, lines 2-11).

### **January 9, 2001**

#### **Direct Examination via Frank Piel**

Shaal confirms he lived in Florida from August or September of 1997 to June of 1999, lived with Jamie for about a month until he got his own place down the street, and spoke to him daily (p 90, lines 8-23 & p 91, lines 1-12).

Shaal confirms he worked with Jamie at three different tree service, on weekends too, and Jamie was the climber doing the tree cutting, and he and the other were the grounds workers (p 92 & p 93, lines 1-3).

Shaal confirms he had known Ronnie Wright since he moved to Florida, and Jody Winkler since he went to Jamie to ask him about a job in 1999 (p 93 & 94).

Shaal claimed he was warned about Ronnie Wright's reputation, was told he would steal your blind if he had the chance, that he was a crack head, and had a bad reputation for truth and honesty (p 95 & 96).

Shaal claimed there was a lot of tension between Jamie and Ronnie Wright in person, and Ronnie had told him about a fight they had been in where Jamie beat him with a stick in front of his friends for trying to jump somebody else at Jamie's house, and he was going to get Jamie back (p 98 – 104).

Shaal claims that Jody Winkler had a bad reputation for truth and honesty, and he knew that he smoked Kool cigarettes (p 105 & p 106, lines 1-3).

#### **Cross Examination via Charles Reynard**

Shaal confirms that the story Ronnie Wright told him about the fight with Jamie was also told to him by Jamie, with the same details (p 106, lines 11-24 & p 107, lines 1-2).