



Syracuse University  
College of Law  
Syracuse National Trial Competition

**UNITED STATES OF AMERICA**

**v.**

**MORGAN WALKER**

**FACT  
PATTERN**

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## **SUMMARY OF THE CASE**

The Defendant, Morgan Walker, is from Syracuse, New Orange, and is married to Riley Jasper-Walker. The Defendant has one child from a previous marriage, Claire Walker, age 9. Riley Jasper-Walker has one child from a previous marriage, Erin Jasper, age 17. The Defendant is a very successful film producer, who has recently landed a large deal with Shmarvel Movies that resulted in the Defendant receiving a bonus in the sum of \$228,000.

On June 13, 2021, Claire Walker was allegedly kidnapped and held for ransom. In the ransom note, the sum of \$228, 000 is demanded from Morgan Walker for the safe return of Claire Walker. A call is to be made later in the day for further instructions. In the meantime, Riley Jasper-Walker calls the police. After the police arrive, the family waits for the phone call, but it never comes. Eventually, Morgan Walker finds the lifeless body of Claire Walker in the basement. Morgan Walker appears to be distraught.

Claire's death is investigated by Detecting Hernandez, who eventually arrests Morgan Walker for the death of her/his only child, Claire. The Defendant has been charged with homicide in the second degree and/or manslaughter. Specifically, the Prosecution claims that the Defendant killed Claire Walker by strangling her.

The Defendant denies the allegations, and claims that an outside party committed the crime, or Erin Jasper committed the crime. The Defendant is also claiming that, during the time of the crime, the defendant suffered from a mental defect or disease.

The parties are only permitted to call the witness listed below. The Prosecution shall call Riley Jasper-Walker, the Defendant's spouse, and Spencer Hernandez, the lead detective. The Defendant will call Dr. Alex Dixon, the psychiatrist, and the Defendant, Morgan Walker.

## TABLE OF CONTENTS

CASE SUMMARY	1
TABLE OF CONTENTS	2
STIPULATIONS PROCEDURAL MATTERS	3
STIPULATIONS SUBSTANTIVE MATTERS	6
EXHIBIT LIST	7
INDICTMENT	8
TESTIMONY OF RILEY JASPER-WALKER	9
SPENCER HERNANDEZ REPORT AND CV	16
STATEMENT OF MORGAN WALKER	21
ALEX DIXON REPORT AND CV	25
JURY INSTRUCTIONS	29
VERDICT SHEET	33

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW ORANGE**

<b>THE UNITED STATES OF AMERICA,</b>  <b>v.</b>  <b>MORGAN WALKER,</b>  <b>DEFENDANT.</b>	<b>NO. CR-082360-2021</b>  <b>THE HON. ROBERT FRANCISCO</b>
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**STIPULATIONS REGARDING EVIDENTIARY MATTERS  
PROCEDURAL MATTERS**

The Court hereby ORDERS, and the parties STIPULATE, to the following evidentiary and procedural matters:

1. This matter was properly and timely commenced, and the United States District Court for the Northern District of New Orange has jurisdiction over this action.
2. The defendant was indicted under 21 OPC § 125.20 (Manslaughter in the First Degree), and 21 OPC § 125.25 (Murder in the Second Degree).
3. The defendant has been deemed competent to stand trial.
4. The parties cannot withdraw any affirmative defenses.
5. The case will come to trial in the year of 2021. All speedy trial arguments have been ruled on pre-trial and denied.
6. The parties are required to call only the 2 witnesses set forth below, and those witnesses may not be recalled by either side. Because the parties are limited to two witnesses per side, for purposes of the trial, no argument may be made or entertained that a party did not call a different witness to testify, as doing so will undermine the spirit of competition. For example, a defense team may not argue that the prosecution did not meet its burden because they did not call any other witnesses to testify. This rule does not preclude a team from arguing that based on the confrontation clause, certain evidence or testimony is not admissible due to a witness's failure to testify (subject to any other stipulations herein).
7. All witnesses, who have been called to testify, may be played by any gender.
8. The parties are required to call their witnesses in the order set forth below. The Prosecution must call Riley Jasper-Walker as their first witness, and Spencer Hernandez as their second witness. The Defense must call Morgan Walker, as

their first witness, and Alex Dixon, as their second witness. It is stipulated that the Defendant is seated at Counsel table, however, no one is actually permitted to be seated there.

9. All materials in the case file will be treated as originals and authentic, unless otherwise noted in the file; handwriting and signatures are authentic unless otherwise noted or contested in the case file; all documents that appear to have been sent to or by a witness are to be considered as having been sent or received by that witness; and all witnesses must authenticate exhibits and materials with which they are familiar.
10. All prior testimony, transcripts, statements, and reports are signed and dated, and no argument may be made or entertained to the contrary unless specifically stated in the fact pattern.
11. The parties have gathered and exchanged in discovery all statements (defined as prior testimony, transcripts, statements, reports, expert reports, and/or other documents, and no argument may be made or entertained to the contrary unless specifically stated in the fact pattern.
12. The parties cannot withdraw any charges or withdraw affirmative defenses.
13. All items in this fact pattern, and referred to in prior testimony, transcripts, statements, reports, and/or other documents provided, were provided to the Prosecution and the Defense, through discovery, and no objections related to the disclosure of this evidence will be made or entertained.
14. Before trial, the parties had their respective client or witnesses review their prior testimony, transcripts, statements, reports, expert reports and/or other documents, and the witnesses signed a certification, under penalty of perjury, that they have reviewed said document(s), and determined that the answers/information contained therein is truthful, accurate and complete, and that they have no other information relevant to the matters discussed.
15. All discovery requirements have been timely and are sufficient, pursuant to the Federal Rules of Criminal Procedure (and the Federal Rules of Civil Procedure if applicable). No argument may be made or entertained to the contrary.
16. Expert reports were timely exchanged. No argument may be made or entertained to the contrary.
17. The parties stipulate that all notice requirements under the Federal Rules of Evidence have been constructively met. For example, notice requirements under 404(b) are deemed by the Court to be met. However, this stipulation does not affect the admissibility of or objection to any other evidentiary issues pursuant to the Federal Rules of Evidence.

18. The case summary is solely meant to provide a synopsis of the case. The case summary is not an exhibit, may not be offered at trial and is not admissible.
19. All exhibits in the file are authentic and the original of that document unless otherwise noted on the exhibit or established by the evidence.
20. All necessary search and arrest warrants were issued and are valid. No objection will be entertained or granted regarding search and arrest warrants.
21. No chain of custody issues exist regarding the physical evidence collected. No objection will be entertained regarding chain of custody.
22. No witness may testify about the handwriting or signatures on the certifications. No party may comment on the handwriting or signatures on the certifications.
23. The prosecution may elect to prosecute under Count One (Murder in the Second Degree), and Count Two (Manslaughter in the First Degree), OR the prosecution may elect to prosecute under ONLY Count Two (Manslaughter in the First Degree). During the meet and confer session, the prosecution shall inform the defense as to whether they are requesting the jury be instructed on BOTH Counts or ONLY Count Two (Manslaughter). The Presiding Judge must be informed prior to pre-trial motions, and which Jury Verdict form should be used (there are three).
24. Prior to trial, the Court instructed Counsel as to the following housekeeping matters:
  - a. All exhibits are pre-marked by numbers and shall retain their original numbers regardless of the order they are introduced at trial.
  - b. All witnesses have been sworn before testifying at trial.
  - c. When laying the foundation to introduce exhibits, Counsel should not ask permission to approach and hand the witness the exhibit but should ask to post the exhibit to the shared screen of the judge and the witness.
  - d. When using prior testimony, grand jury transcripts, interrogation transcripts, depositions, statements, affidavits, affirmations, and other documents/exhibits, for purposes of refreshing recollection or impeachment, Counsel is not required to have it marked for identification.
  - e. Counsel may not request, nor will the Court grant, any additions, or modifications to the jury instructions.
  - f. Counsel should ask for a sidebar to constructively go outside the presence of the jury.

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW ORANGE**

<b>THE UNITED STATES OF AMERICA,</b>  <b>v.</b>  <b>MORGAN WALKER,</b>  <b>DEFENDANT.</b>	<b>NO. CR-082360-2021</b>  <b>THE HON. ROBERT FRANCISCO</b>
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**STIPULATIONS REGARDING EVIDENTIARY MATTERS  
SUBSTANTIVE MATTERS**

The Court hereby **ORDERS**, and the parties **STIPULATE**, to the following evidentiary and substantive matters:

1. Morgan Walker was born on April 2, 1966, and is 55 years old.
2. Riley Jasper-Walker was born on March 26, 1981, and is 40 years old.
3. Erin Jasper was born on November 25, 2003, and is 17 years old.
4. Clair Walker was born on February 16, 2012, and was 9 years old at the time of her death.
5. Morgan Walker's net worth is \$7.6 million.
6. Morgan Walker was arrested on June 14, 2021.
7. Marital and spousal privileges are hereby waived.
8. Exhibit A, Exhibit D, Exhibit I, and Exhibit J are admissible, and may be offered into evidence by either party at any time, without objection.
9. The mental health records of Morgan Walker and Erin Jasper have been shared with both parties by Dr. Alex Dixon. There has been a waiver of the privilege found in Federal Rule of Evidence 513.

**UNITED STATES DISTRICT COURT  
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**EXHIBIT LIST**

EXHIBIT A: 911 TRANSCRIPT  
EXHIBIT B: NOTE  
EXHIBIT C: GROCERY LIST  
EXHIBIT D: AUTOPSY REPORT  
EXHIBIT E: PHOTO OF FLASHLIGHT  
EXHIBIT F: PHOTO OF FOOTPRINT  
EXHIBIT G: PHOTO OF BASEMENT WINDOWS  
EXHIBIT H: POLICE BULLETIN ON RISE IN BURGLARIES  
EXHIBIT I: FINGERPRINT ANALYSIS  
EXHIBIT J: DNA ANALYSIS  
EXHIBIT K: PHONE RECORDS  
EXHIBIT L: BANK RECORDS  
EXHIBIT M: ARTICLE  
EXHIBIT N: PRENUPTIAL AGREEMENT  
EXHIBIT O: DSM



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**INDICTMENT**

**COUNT ONE:** On or about June 13, 2021, in the City of Syracuse, State of New Orange, the defendant, MORGAN WALKER, with intent to cause the death of Claire Walker, did intentionally cause the death of such person, in violation of 21 OPC § 125.25 (Murder in the Second Degree).

**AND/OR**

**COUNT TWO:** On or about June 13, 2021, in the City of Syracuse, State of New Orange, the defendant, MORGAN WALKER, with intent to cause serious bodily injury to Claire Walker, intentionally caused serious physical injury which resulted in the death of such person, in violation of OPC § 125.20 (Manslaughter in the First Degree).

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**TESTIMONY OF RILEY JASPER-WALKER**

1 The following is a transcript of the testimony of RILEY JASPER-WALKER, given under oath at  
2 the Preliminary Hearing for the above captioned matter on July 7, 2021.

3 **BY MS. OTASOWIE:**

4 Q: Please state your name for the record.

5 A: Riley Jasper-Walker

6 Q: Tell me about yourself.

7 A: I was born and raised her in Syracuse, New Orange. My family is from here and we have  
8 roots all the way to the founders of New Orange. After high school, I became a dog trainer.  
9 I was on my way to becoming a world champion with the American Kennel Club, but that  
10 all stopped after I met Morgan. Morgan wanted me to stay at home to watch Claire. Being  
11 a dog trainer at that caliber required a lot of travel, so I reluctantly agreed. I never really  
12 understood because I raised my child, Erin Jasper, all alone while on the dog competition  
13 circuit and look how Erin turned out.

14 Q: Who is Morgan?

15 A: Morgan Walker, my spouse.

16 Q: How long have you two been together?

17 A: We were together for a year.

18 Q: How did you meet Morgan?

19 A: I met Morgan in May 2019. I was at a screening for one of Morgan's movies at a local  
20 theater. I'm sure you've heard of it; it was called Good Luck Don't Suck. Anyway, Morgan  
21 noticed me, and I noticed Morgan. It was love at first site. I didn't care that Morgan was so  
22 much older than me. Morgan was so funny, so famous, and fabulously wealthy.

23 Q: You said famous. What for?

24 A: Morgan has a reputation of being one of the best producers in Hollywood. But with that  
25 also came a lot of attention. Morgan was a serial adulterer and had never married before

1 me. Morgan said that after meeting me, s/he wanted to change and really settle down.  
2 Morgan ended up having full custody of Claire after she was born. We bonded over the  
3 fact that being a parent is a big responsibility. I met Claire when she was home from  
4 boarding school on a holiday. We had a big “meet the family” get together so I could meet  
5 Claire and Morgan could meet Erin. I told Morgan to not make Claire go back to boarding  
6 school and to let us be a real family. The next thing I knew, we were planning to get married  
7 on May 21, 2020.

8 Q: Tell us about that time in your life.

9 A: I thought everything was going to be perfect, but I had a sneaking suspicion that Morgan  
10 would go back to old habits. That’s why I had the date of our marriage engraved on our  
11 wedding bands. So, Morgan would never forget the day we made vows to one another. It  
12 was my way of telling Morgan to keep on the right path. That’s not all I did to keep Morgan  
13 on the straight and narrow.

14 Q: What do you mean by that?

15 A: Right before we got married, Morgan asked me to sign a prenuptial agreement. I said the  
16 only way I’d do that is if there was a morality clause. Morgan agreed, and it worked. As far  
17 as I know Morgan never cheated on me with anyone.

18 Q: So everything was great after that?

19 A: Not exactly. You see, the job took a toll on our marriage. Morgan was never home, and  
20 that had to change. Morgan needed to concentrate on our relationship and our family.  
21 Morgan agreed, but having Morgan home so much came with it’s own set of problems.  
22 Morgan complained that Claire was bouncing off the walls. Literally using her head to  
23 bounce out of chairs, and Morgan was stressed about it.

24 Q: Did you ever observe any of that behavior from either of them?

25 A: I never saw anything like that with Claire, and I only remember Morgan complaining about  
26 headaches a couple times. I never saw anything that looked like a take-you-out headache,  
27 but Morgan mentioned going to Dr. Dixon, but I’m not sure when that started. Dr. Dixon  
28 also treated Erin, but that was after Dr. Dixon had already been treating Morgan.

29 Q: What was going on with Erin?

30 A: I’d say a lot of good and a lot of bad was going on. You see, Erin was smart, but also a  
31 smart aleck, like any teenager. Erin was a great wrestler and that made other students  
32 jealous. There was a run in or two with other students, but I made sure none of that was  
33 on Erin’s permanent records. I didn’t want Erin’s potential for success to be limited if  
34 colleges or professional teams looked at those records. But I couldn’t do it all, and a school  
35 counselor recommended that we have Erin see a therapist, and that’s what we did. Morgan  
36 actually suggested we take Erin to Dr. Dixon. Since taking Erin to Dr. Dixon, Erin has been  
37 working through the reasons why trouble seems to always be knocking at Erin’s door.

38 Q: Do you have any children with Morgan?

39 A: No, we each had one child separately, but Claire died earlier this year.

1 Q. I am sorry for your loss, how old was she?

2 A. She was 9 when she died.

3 Q: Was Claire your child?

4 A: Oh no, Claire was Morgan's.

5 Q: Are you and Morgan still married?

6 A: Yes, but I filed for divorce on June 15, 2021, should be finalized by June 2022 if everything  
7 goes to plan.

8 Q: Why did you file for divorce?

9 A: I didn't want to be involved with someone who could that to their own child. I mean Claire  
10 was 9 years old when she died.

11 Q. I am sorry for your loss. What day did Claire die?

12 A. On June 13, 2021.

13 Q. What happened that day?

14 A. I don't really know. I was home with Claire for a while. Then Erin and Morgan walked  
15 through the door. Morgan was getting both kids a snack, so I went upstairs to put laundry  
16 away and call my sister, Lauren. I was probably up there for 30 minutes, maybe an hour,  
17 when all of a sudden, I heard a bunch of commotion. It was some sort of crashing, and  
18 then it sounded like someone was grunting, almost like they were out of breath.

19 Q: What did you do when you heard that?

20 A: I walked down stairs pretty quickly, and by the time I got there, I didn't see anyone. I just  
21 found the note on the kitchen counter. Claire had been taken and they were asking for  
22 \$228,000.

23 Q. Do you recognize this Exhibit B?

24 A. Yes, that's the ransom note.

25 Q. Why did the note ask for specifically \$228,000?

26 A. How would I know?

27 Q. Does that number have any significance to you?

28 A. Well, Morgan received a bonus or something at work for that same amount.

29 Q. What did you do when you found that note?

30 A. I screamed and Morgan ran in from the garage, and Erin ran down from the second floor.  
31 Erin must have been upstairs in the bathroom or in their bedroom.

32 Q: What happened after that?

33 A: The note told us not to call the police, and that they'd be calling us between 5:00 and  
34 7:00PM. But I knew we needed to get the police there right away, so I called them. It had

1 to have been after 4:30PM, about 30 minutes after Morgan and Erin got home from  
2 wrestling practice.

3 Q. How long did it take for the police to arrive?

4 A. Not long at all, the detectives were close behind. Detective Spencer Hernandez was the  
5 first one to start asking questions.

6 Q. What do you mean by that?

7 A. Well, after everything, we just figured that the police would immediately come in and start  
8 asking questions. I mean Morgan's little girl was missing. But the police just made us sit  
9 in the living room and wait until Detective Hernandez finally arrived and got things started,  
10 asking questions about our family and what happened.

11 Q. Let's talk about your family dynamics. What is Morgan's relationship like with Erin?

12 A. Well they have a normal relationship, except when it came to wrestling. Being that they  
13 play the same sport, they are always trying to one up one another. Morgan wrestled in  
14 college and almost made it professionally, and Erin was wrestling now. I thought they got  
15 along, but I'm not sure Erin is getting along with Morgan now.

16 Q. Because of what you believe Morgan did to Claire?

17 A. That, and Morgan just benched Erin right before the summer wrestling tournament, which  
18 a lot of scouts go to. Erin really wants to get recruited to wrestle in college. Morgan knew  
19 that but still benched Erin.

20 Q: Why did Morgan bench Erin?

21 A: They must have gotten into some argument; I am not really sure. Morgan just said Erin  
22 has an attitude problem when I asked.

23 Q. How do you feel about this relationship?

24 A. Honestly? I don't really care how Morgan feels about Erin, Erin isn't Morgan's kid. They  
25 have only known each other for a year, can you really form a family bond in that short of  
26 time?

27 Q. How was Morgan's relationship with Claire?

28 A. Morgan loved Claire. Claire was the apple of his/her eye. Morgan was devastated when  
29 Claire's body was found, I will never forget how sad Morgan looked that day.

30 Q. What about Erin and Claire? How was their relationship?

31 A. They had your typical sibling relationship. They would have little tiffs but nothing major.  
32 Claire looked up to Erin. Claire even wanted Erin to teach her how to wrestle. But Claire  
33 would get on Erin's nerves, and Erin was not great at regulating emotions.

34 Q. Let's go back to June 13. Did you look for Claire after finding the note?

35 A. Not that I recall, I just called the police. But Morgan and Erin looked around the house.  
36 There was no sign of her.

1 Q. How was Claire found?

2 A. After the detective arrived, we were asked for some photos of Claire, which we keep in  
3 albums in the basement. I can never keep track of that key, so Morgan or Erin would have  
4 to unlock the basement door. Morgan went down to the basement. The next thing I knew,  
5 Morgan was carrying Claire up the stairs with a blanket tossed over her head.

6 Q. What happened next?

7 A. I don't really remember.. It was a flood of emotion. I blamed myself, Morgan, and the  
8 Police. I wanted someone to be held accountable for this.

9 Q. Did you go down to the basement after?

10 A. Yes, I had to. I had to see where she was. I couldn't believe she was right beneath our  
11 feet. The police also wanted us to tell them if anything was out of place or stolen.

12 Q. What did you see when you went down there?

13 A. We have two windows in the basement. Two are open because we run cords through  
14 them to power some outdoor lights. There were large footprints on the ground. You know,  
15 I have my suspicions on who did this. The last people I saw with Morgan's daughter were  
16 Erin and Morgan. I know it couldn't have been Erin. Erin loved Claire and is gentle as a  
17 lamb. So who's left?

18 Q. But do you know for sure who did this?

19 A. No. I don't know. It could have been Morgan or a stranger. All I know is that I gave her a  
20 snack and then the next time I saw her, she was dead.

21 Q. Thank you, nothing further.

22 **BY MR. EATON:**

23 Q. I'm going to ask you some questions, starting off with asking you about grocery lists. You  
24 write grocery lists, correct?

25 A. Yes, I am not sure where you are going with this.

26 Q. Handing you Exhibit C, do you recognize this?

27 A. I think so, it looks like a grocery list I made.

28 Q. Do you always make your lists in blue ink?

29 A. I always lose my pens, so I try to keep one in the junk drawer in the kitchen at all times. I  
30 guess at this time the pen was blue.

31 Q. You said that the people who wrote the note were supposed to call between 5:00 and 7:00  
32 pm?

33 A. That's what the note said, we waited with the police until that time frame

34 Q. They never called you though?

1 A. Never, never asked for the money, never called. They weren't going to get any money  
2 from us, Claire was found dead a few moments after 7:00 PM.

3 Q. You recognize this Exhibit K?

4 A. These are the records for our landline.

5 Q. Before calling the police you called your sister, Lauren?

6 A. I was already on the phone with my sister when I found the note.

7 Q. Did you tell her about the note?

8 A. I was in shock, I hung up and called the police.

9 Q. What did you tell the 911 dispatcher?

10 A. Listen to the call and you'll hear what I said. I'm sure it was recorded.

11 Q. I just want to make sure I understand the transcript. What did you tell the 911 dispatcher?

12 A. I told them everything that happened. Every little detail, from the fact that Claire was  
13 missing to the fact that it had to be Morgan who did this.

14 Q. Are you saying you specifically told the 911 dispatcher that Morgan Walker kidnapped  
15 Claire?

16 A. Yes I did. I'm absolutely sure,

17 Q. You didn't tell the dispatcher that someone broke in and left a note?

18 A. No, why would I have told them that?

19 Q. Well according to the 911 transcript that's what you said.

20 A. I'm sticking with my story. It was Morgan.

21 Q. But you don't know that for certain.

22 A. No, but Morgan and Erin are the last people I saw Claire with before she was killed, and  
23 Erin would never do anything like that, so it had to be Morgan.

24 Q. Did the police talk to Morgan or Erin?

25 A. They talked to Morgan, but there's no way in hell I was going to let them talk to Erin.  
26 Especially after Morgan had to run off to the bathroom after talking to the Detective.

27 Q. Why is that?

28 A. Erin is my only child and only person I have left in my life. Erin's my whole reason for  
29 existence. I couldn't bear to have the police arrest Erin. For Erin to be convicted. For Erin  
30 to end up in prison for something innocent that a child might say that could be twisted into  
31 some kind of confession.

32 Q. What allegedly innocent thing could Erin say that would be a confession?

1 A: Stop twisting my words. What I meant was that Erin's a young kid and didn't need to be  
2 talking to cops. We all know how cops can be. They can get a kid to say anything, and I  
3 couldn't let that happen, wouldn't let that happen, and it didn't happen. Everything turned  
4 out perfectly.

5 Q: What do you mean by everything turned out perfectly?

6 A: My soon to be ex is going to jail, and Erin and I are going to be heading out of the country  
7 for a six-month long vacation once my divorce is finalized. We're going all around the  
8 world. From Canada to Chile to Croatia to China, and everywhere in between. I seldom  
9 do anything for myself but I think we need to get out town, and I've definitely earned myself  
10 this vacation.

11 Q. Thank you, nothing further.

12

13 **CERTIFICATION:** On this 7<sup>th</sup> day of July 2021, I certify, under penalty of perjury, that I have  
14 carefully reviewed the above preliminary hearing testimony to determine whether the  
15 answers contained are true and correct, and whether I had any additional information  
16 relevant to the matters therein. I hereby certify, under penalty of perjury, that the  
17 preliminary hearing testimony is accurate, and I have no information relevant to the  
18 matters discussed other than what is discussed in this grand jury testimony. Everything  
19 was covered and nothing was left out.

20 **Riley Jasper-Walker**

**July 7, 2021**



# Spencer Hernandez

New Orange State Police Department  
Detective, First Grade  
263 Arnold Road  
Burger Bay, New Orange

## IN THE MATTER OF THE DEATH OF CLAIRE WALKER INVESTIGATIVE REPORT

1 **SYNOPSIS:** Based on my training, background, and experience (CV is attached), and my  
2 investigation of the crime scene, exhibits examined, and interviews conducted, I've concluded  
3 that Morgan Walker caused the death of Claire Walker.

4  
5 **INVESTIGATIVE NARRATIVE:** On June 13, 2021, I was dispatched to a potential kidnapping  
6 at 5101 Crestmont Ave, in Syracuse, New Orange. Upon my arrival, I was told there were three  
7 family members at the scene, and the deceased, Claire Walker. There was Riley Jasper-Walker  
8 ["Riley"], Erin Jasper ["Erin"], and Morgan Walker ["Morgan"]. I learned that Riley and Morgan  
9 were married; that Erin was Riley's child from a different relationship; and the deceased, Claire,  
10 was Morgan's from a different relationship.

11  
12 RILEY JASPER- WALKER: I first spoke to Riley Jasper-Walker and asked where  
13 everyone was at the time of the alleged kidnapping. Riley informed me that s/he was home  
14 with Claire when around 4:00 PM, Erin and Morgan returned home from wrestling practice.  
15 Riley then went upstairs to the second floor to put away laundry and call Lauren Jasper,  
16 Riley's sister. During the call, Riley heard a loud crash. Riley then "flew down the stairs to  
17 the first floor in a matter of seconds, and ran around the house like a banshee," looking  
18 for whatever caused the crash. Riley finally made his/her way into the kitchen. It was there  
19 that Riley found the alleged ransom note on the counter. I questioned Riley about the  
20 ransom note, and the fact that they called law enforcement even though the note told the  
21 family not to. Riley said there was no question that they needed to call the police. While  
22 taking this narrative from Riley, I realized that we were in the time window described in the  
23 "ransom note" found. We waited and waited, but there was no call. None of the family  
24 noted that the window had closed with no call. This made me very suspicious, and I began  
25 interviewing the rest of the family.

26  
27 MORGAN WALKER: Next, I spoke to Morgan Walker, and asked where everyone was at  
28 the time of the alleged kidnapping. I was told that Morgan, who was coaching the Peter  
29 Hakes High School wrestling team, returned home with Erin, who wrestles on the team.  
30 This was around 4:00 PM. When Morgan and Erin arrived, Claire was already home.  
31 Morgan spoke to Riley before Riley went upstairs. Morgan then went to the kitchen with  
32 Claire and Erin to get them a snack. While the three of them were sitting down for a snack,  
33 Morgan noticed that Claire would not sit still. Morgan stated that Claire was "bouncing off  
34 the walls and it was absolutely unbearable." Morgan admitted to getting very angry. So  
35 angry that Morgan left the room to go to the garage "to blow off some steam." I was told  
36 Morgan has a punching bag out there, which a therapist recommended Morgan use for  
37 anger management. Morgan reported that before taking the first punch, Morgan got a very  
38 bad headache and blacked out. The next thing Morgan remembers was Riley screaming  
39 for help. When questioned about whether this was before or after Riley found the ransom  
40 note, Morgan stated "I am a bit fuzzy, but it must have been after. At least I'm 90% sure  
41 of that, but I really can't remember much that happened after that headache, until I came

1 to. I was sitting on a kitchen chair.” Shortly after that, Morgan and Riley went outside to  
2 search for Claire. When I started to ask Morgan about the last interaction Morgan had with  
3 Claire, Morgan appeared to feign a headache, said “I feel like vomiting,” and ran off.  
4

5 Erin Jasper: After that, I asked to interview Erin Jasper, however Riley did not feel  
6 comfortable with the idea of me speaking with Erin. I asked why, as Erin appeared to be  
7 shaken up but coherent enough for an interview. Riley interjected that “I’m Erin’s parent  
8 and I do not need to give a reason.” When I asked what Erin’s other parent would think  
9 about me interviewing Erin, Riley stated “Nothing, they haven’t been involved since Riley  
10 was born. Erin’s not Morgan’s biological child.” I did not subsequently interview Erin  
11 afterwards, in spite of the fact that I suspected Erin to be with Claire before the alleged  
12 disappearance.  
13

14 **POST-INTERVIEWS:** Following these conversations, I asked if they had photos of Claire. Riley  
15 said they kept photo albums in the basement, and I asked that they get a selection for me. When  
16 Erin got up to get them, Riley said, “no, don’t go Erin. Let Morgan do it. Morgan has the key.”  
17 Morgan got access to the previously locked basement. Morgan came back up from the basement  
18 with Claire Walker’s body. I instructed Morgan to place her on the ground and told Morgan that  
19 s/he should not have picked her up as now evidence could have been contaminated. Morgan  
20 appeared horrified. Erin hid behind his mother. Riley looked on, shielding Erin. I stood there for a  
21 moment, realizing that the officers who were first at the scene had failed to inspect the basement,  
22 or the rest of the house. That should be standard procedure for these cops. Any good police  
23 officer should know to inspect the residence and they should have known that I could not inspect  
24 the place and conduct interviews at the same time. Because of their complete and total failure to  
25 do even the bare minimum, we may have now had contaminated evidence. That being said, I  
26 sent the Evidence Collection Unit to search the basement.  
27

28 **PHYSICAL EVIDENCE:** I was informed of the physical evidence collected by the Evidence  
29 Collection Unit (ECU). This included: (1) photo of windows in the basement, (2) photo of a footprint  
30 in the basement, (3) photo of a flashlight found in the living room, (4) photo of a drawer in the  
31 kitchen, (5) fingerprinting was done on the flashlight, (6) the ransom note, and (7) the other note  
32 found in the kitchen. The other investigating officers informed me that they believe someone broke  
33 into the basement because of the basement windows being open and footprints found within the  
34 basement. They asked if they should continue to follow that theory, I informed them that I believed  
35 it was done by someone in the family and to not follow that theory any further.  
36

37 **CONTINUING INVESTIGATION:** After collecting evidence from the scene, I subpoenaed Morgan  
38 Walker’s bank records, the phone records from Riley Jasper-Walker’s phone, the 9-1-1 transcript,  
39 and the autopsy report done on Claire Walker. I requested that the fingerprints found on the  
40 flashlight be sent for analysis. I also requested that the note and Claire Walker’s body be tested  
41 for presence of DNA and, if any DNA was found, that DNA be tested against DNA of the Walker’s.  
42 After receiving all the reports I requested, I began my analysis.  
43

44 **ANALYSIS AND OPINIONS:** The following is my opinion given within reasonable degree of  
45 professional certainty:  
46

47 RANSOM NOTE: Based on my experience in handling at least a dozen cases  
48 involving kidnapping, I determined that this ransom note was not a typical ransom  
49 note. First, the ransom note was written on the same paper of a notepad found in  
50 the family home and used a similar pen also found in the home. The note begins  
51 by only addressing Morgan Walker, not the family or both parents. This is a

1 deliberate decision that suggests the note was either written by someone in the  
2 family or a perpetrator directly targeting the elder Morgan Walker. Either theory  
3 makes sense considering the note was written with a paper and pen inside the  
4 home and also considering that Morgan Walker is a well-known, successful film  
5 producer.  
6

7 *The Group.* Next, the person who wrote the note identifies themselves as  
8 a “group.” This section of the note leads me to believe that the individual  
9 who wrote the note was not working alone. This section also indicates that  
10 the individual may be someone who is close to or employed by Morgan  
11 Walker. However, I believe that this note is an attempt to garner sympathy  
12 and support for the Walker’s. The writer also states that the “group” has  
13 “taken your daughter” to suggest that this note was written after the  
14 abduction.  
15

16 *In Our Possession.* The use of “in our possession” also suggests that the  
17 kidnappers have taken her off the property, however we know this is not  
18 true because Claire was found in the basement of the Walker’s home. This  
19 suggests that the writer anticipated removing Claire from the home and  
20 taking her elsewhere. This would lean against someone in the Walker  
21 family writing this note, because they would have known that Claire was in  
22 the basement. The use of “in our possession” seems to be subconscious,  
23 as if the person writing it did not put much thought into it.  
24

25 *Demand for \$228,000.* The demand for \$228,000 is significant as this is the  
26 exact amount of a bonus received by Morgan Walker. This could be a  
27 coincidence; however, it is more likely that the author of this note knew the  
28 amount received. This is also relatively low compared to Morgan Walker’s  
29 net worth which had recently made headlines.  
30

31 *Watchful Eye.* The writers also suggest that they will be watching the family  
32 closely, telling them that if they withdraw the money earlier, they may  
33 arrange an earlier exchange. This encourages the Walkers to follow the  
34 instructions and to do them as quickly as possible.  
35

36 *Superfluous Language.* The writer completes this demand letter by stating  
37 “any deviation from these instructions will result in you never seeing your  
38 daughter, dead or alive, again. She will be executed, and you will be denied  
39 her remains.” This superfluous detail was added to make the note more  
40 realistic to police. Again, if she was already “executed” in the basement,  
41 the additional threat of not receiving her remains would be moot. Further,  
42 if the family knew Claire was in the basement, there would be no need to  
43 include that second threat.  
44

45 HANDWRITING: After conducting a handwriting analysis, I have concluded that  
46 the handwriting in the note is similar to writing samples found in the home. There  
47 are over 200 similarities in the writing of the note and the writing samples found in  
48 the Walker home. The way the vowels are written, pen strokes, and pressure on  
49 the paper which is seen by how much ink is deposited, are very similar to that of  
50 the writing samples.  
51

1 9-1-1 CALL: The 9-1-1 call leads me to believe that the Walker's were somehow  
2 involved in Claire's murder. First, Riley starts the call by saying "We have a  
3 kidnapping, please hurry!" This plea lacks specifics such as who was kidnapped.  
4 If this were a real call, Riley would have said something like "my daughter" or "our  
5 child." The word "please" is also used which could be used for emphasis or  
6 politeness. Someone in an emergency does not worry about being polite. Riley  
7 later tells the operator that the note says, "TAB Victory," however this is incorrect.  
8 The note actually says "Victory TAB." While this switch seems inconsequential, it  
9 actually indicates that s/he was not reading the note when telling the operator. If  
10 s/he had the note in his/her hand, then the order would have not been switched.  
11 The operator then asks how long Claire has been missing, Riley states they "just  
12 found the note and realized she was gone." Using the word "just" indicates  
13 minimization. Riley could be minimizing the amount of time or his/her actions. This  
14 response also indicates that Riley found the note and then realized Claire was  
15 gone. Towards the ends of the call, when asked who s/he is, Riley responds "I'm  
16 the mother/father." Saying "*the* mother/father" indicates distance, whereas saying  
17 "*her* mother/father" indicates a personal relationship and taking ownership. Riley  
18 could have been avoiding taking ownership of a dead body if she knew Claire was  
19 dead. The last thing Riley says is "please send someone" this is also odd because  
20 when people call 9-1-1 they indicate exactly what they need by stating they need  
21 an ambulance, police, or fire department. Finally, Riley hangs up the phone and  
22 ends the call. This is incredibly unusual. The 9-1-1 operator is your lifeline during  
23 an emergency, the only person able to help you and send you help. Normally,  
24 people stay on the phone with the operator until the ambulance or police arrive.  
25 However, here, once Riley's job of reporting Claire missing is done, s/he hangs  
26 up.

27  
28 EVIDENCE: The physical evidence collected from the home indicates that the  
29 murder was done by someone within the home. First, the flashlight found in the  
30 Walker's living room was tested for fingerprints and DNA. The fingerprints were a  
31 match to Erin. The DNA found was determined to be Claire Walker's blood.  
32 Second, Claire's body was also tested for DNA. There was touch DNA found on  
33 the back of Claire's neck that matched Morgan Walker. Third, Claire Walker's  
34 autopsy determined that her cause of death was blunt force trauma to the head  
35 and strangulation. The medical examiner also found two small dots consistent with  
36 marks from a stun gun. This physical evidence indicates that Claire Walker's death  
37 was caused by Morgan Walker strangling her. In my opinion, Morgan Walker grew  
38 frustrated with Claire, strangled her, then threw her down the stairs and locked it.  
39 There was also evidence found in the basement, such as open windows and an  
40 unidentified footprint. This footprint did not match anyone in the home.  
41 All my opinions stated are within a reasonable degree of professional certainty.  
42

43 **Certification:** On the 7th of July, 2021, I certify, under penalty of perjury, that I have carefully  
44 reviewed the above report to determine whether the information contained is true and accurate,  
45 and whether I had any additional information relevant to matters therein. I hereby certify, under  
46 penalty of perjury, that the report is truthful, accurate, and complete. Everything was covered and  
47 nothing was left out.  
48

49 /s/ Spencer Hernandez

July 7, 2021

## **Spencer Hernandez**

New Orange State Police Department  
Detective, First Grade  
263 Arnold Road  
Burger Bay, New Orange

### **CURRICULUM VITAE**

#### Education

- University of Pennsylvania (1990-1994)
  - B.S. in Criminology
  - B.S. in Biology
- Boston University School of Medicine (1994 –1996)
  - Master's degree in biomedical forensic science
- Federal Bureau of Investigation Training Academy (1996)
  - Specifically trained in DNA analysis, fingerprint analysis, and handwriting analysis

#### Employment

- Federal Bureau of Investigation, *Special Agent* (1996-2011)
  - Investigated over 300 violent crimes throughout the United States
  - Routinely handled cases involving conspiracy and kidnapping
  - Conducted forensic analysis with the FBI Crime Lab
  - Rookie of the year (1996)
- Orange Police Department, *Detective, First Grade* (2011-Present)
  - Led over 200 crime scene investigations

#### Certifications (since 2011)

- Certified Forensic Analyst in New Orange
- Certified Crime Scene Investigator
- Certified Graphologist by the American Association of Handwriting Analysts

All Certifications listed require biennial recertification.

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW ORANGE**

<b>THE UNITED STATES OF AMERICA,</b>  <b>v.</b>  <b>MORGAN WALKER,</b>  <b>DEFENDANT.</b>	<b>NO. CR-082360-2021</b>  <b>THE HON. ROBERT FRANCISCO</b>
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**VOLUNTARY STATEMENT OF MORGAN WALKER**

1 This statement is being voluntarily given, upon being duly sworn and subject to the threat of  
2 perjury by Morgan Walker, to Officer Allison Kowalczyk of the New Orange Police Department.

3 My name is Morgan Walker and I currently reside at 5101 Crestmont Ave, Syracuse, New Orange.  
4 I was born, raised, and went to school here in Syracuse, New Orange. I lived here until I was 21,  
5 when I graduated from New Orange University with a degree in film. I moved to Hollywood to  
6 pursue my dream of being a film producer. I had family in the industry and got lucky. I got a lot of  
7 jobs. My name was on every big-time movie, and I rose to fame quickly. I am now a full-time film  
8 producer. My most recent film concluded recently, and I have decided to take the rest of the year  
9 off for wrestling and to spend time with my family.

10 Speaking of my family, I'm sure you want to know more about that. For starters, I had never  
11 married before Riley. Settling down wasn't for me and I believe that humans are not supposed to  
12 be monogamous animals. My daughter, Claire, was the product of one of my relationships and I  
13 ended up with full custody. Because I am so busy, it meant mostly boarding schools for Claire,  
14 but I'd see her when I could take time off of work in between projects. That's one of the reasons  
15 Riley has been the perfect fit. I met Riley almost two years ago, sometime around May of 2019,  
16 and as soon as Riley met Claire, I knew I wanted that to be my family. All Riley ever talked about  
17 was how we should get married, take Claire out of boarding school, and start acting like a real  
18 family. I met Erin, Riley's kid, and tried to bond as much as I could. I mean Erin was the whole  
19 reason I started coaching the wrestling team. Riley and I got married on May 21, 2020, it was a  
20 dream come true. Riley had the date put on our wedding band, so we'd never forget the day we  
21 made our vows to one another. I've been nothing but faithful ever since I met Riley. I asked Riley  
22 to give up dog training to take care of Claire. Riley was reluctant, but agreed.

23 Like I said, my recent film project just finished, and I have been able to take a good bit of time off  
24 to spend with my family. Over the past year, however, I've been in Hollywood so much that I didn't  
25 know how hectic it was dealing with all the day to day things Riley has had to deal with. I mean I  
26 love Claire dearly and all, but what was an issue when she was eight, became a bigger issue just  
27 recently when she turned nine. Last year it was all about her running and screaming and running  
28 and screaming. She just had so much joy, and every once in a while, she had just too much joy,  
29 that I couldn't really deal with it. I would get a little annoyed with her, but I am just tired and cannot  
30 keep up with her. For some reason, I would black out when she was acting up with all that  
31 joyousness. After one particularly bad black out, probably around Thanksgiving, I started going to

1 see Dr. Dixon. Claire had been yelling at Erin to teach her how to wrestle and I could not get her  
2 to be quiet. I blacked out and when I came to, Claire was crying on the floor. Erin and I told Riley  
3 she fell out of her chair, but I don't really remember what happened.

4 My relationship with the other child isn't as close. I mean, when I met Erin, an almost full grown  
5 teenager, it was a tough place to be put in when it comes to building a rapport. I think Erin was  
6 15 or 16 at the time, and now that Erin is 17, I've been trying harder to step up to the plate. That's  
7 what doing the coaching gig is all about, and I think that it's been good to spend all this time,  
8 actually every afternoon, coaching Erin, who has the potential to be a star wrestler.. Because of  
9 Erin's bright future, Riley ensures that Erin's record remains clean. That's really important to Riley,  
10 who keeps telling me that there is no reason for Erin's potential to be limited because of minor  
11 mistakes. You see, Erin occasionally gets in trouble at school, but we have Erin working with Dr.  
12 Dixon, a family psychologist. I guess Dr. Dixon is trying to work through the underlying reasons  
13 Erin gets in trouble. Riley makes sure that nothing ends up on Erin's permanent record because  
14 colleges or professional teams could potentially request those from the schools. Riley only wants  
15 what is best for Erin and will do everything to protect Erin. I can't tell you how often I've heard  
16 Riley say, "Erin is my first priority. Period."

17 Riley and I have had a wonderful relationship. We met when I was at a premiere in Syracuse for  
18 a movie I had produced. Riley was dating the assistant director. We started talking and became  
19 friends, then eventually started dating. After about six months of dating, we were married. Before  
20 getting married to Riley, my lawyer, Laura Benjamin, advised me to get a prenuptial agreement.  
21 Riley agreed but wanted to include a morality clause. Riley was very specific that the clause  
22 should state that if either of us were unfaithful or committed a crime that resulted in prison time,  
23 the other would get 90% of all property. After getting married, I requested that Riley quit his/her  
24 job to take care of MJ. Riley was a full-time dog trainer, which required a lot of travel. Riley was  
25 reluctant but understood that s/he could go back to dog training after Claire was older. I try to  
26 spend as much time with Riley as I can when I am home. Depending on the projects I get signed  
27 to, I try to take 3-6 months off to spend time with the family.

28 I am currently undergoing treatment with family psychiatrist Dr. Alex Dixon. I started going to Dr.  
29 Dixon in 2018. Dr. Dixon has required me to have office visits every two weeks. In the beginning  
30 of going to treatment, I did not know what was happening to me. I was worried about my blackouts.  
31 Dr. Dixon was very helpful and identified that this would happen when I got very angry. Ever since  
32 we identified that the reason for my blackouts was anger, we started working through why I would  
33 get angry and how to manage that anger. Dr. Dixon suggested boxing and coaching. Boxing  
34 allows me to get my anger out on something that is not harmed. I use a punching bag in the  
35 garage. Coaching teaches me patience with children. These tools have been working and now I  
36 only blackout when I lose control of my anger.

37 On June 9, 2021, two employees requested a meeting with me. I had just finished a major film  
38 project. The company that I work for, Total Action Board, authorized me to have the next six  
39 months off. As their top producer, they knew it would be best to keep me happy. I was very  
40 annoyed with these employees that they would ask for this meeting. They knew I would be with  
41 my family and that this time was very important. I met with them anyway on June 11, 2021. The  
42 two employees requested raises and portions of the bonus I received from the last film project. I  
43 told them that their request was ridiculous and fired them. I was astonished that they would  
44 request more money from me. These two employees were assistant producers. I do not even  
45 remember if they worked with me on this specific project. I remember telling Riley and Erin about

1 the meeting, I was just so amazed that these employees would do that. Two days later, Claire  
2 went missing and was eventually found dead.

3 On June 13, 2021, I had just gotten home from Sunday afternoon wrestling practice. I thought  
4 that Erin and I had an okay practice. I was teaching the kids how to do a Reverse Neck Pinch.  
5 The Reverse Neck Pinch is where you create pressure on the other person's neck to defend from  
6 a pin. You use your thumb and the side of your hand to pinch the nerves on the back of the other  
7 person's neck, this causes them to flip over to the side and release you from the attempted pin.  
8 Erin was having trouble getting it and was getting very frustrated. I decided it would be best to  
9 bench Erin for the upcoming tournament. Erin was pissed. Riley was pissed when Erin told Riley  
10 too. I did what I thought was best for the team and both of them were only worried about what this  
11 would do to Erin's chances of getting recruited.

12 Erin is always starving after practice, so we went to the kitchen to get a snack. Claire and Riley  
13 were home, Riley went upstairs after we talked about the plans for the rest of the day. I got Claire  
14 and Erin a bowl of fruit. At some point, Claire began screaming and yelling for Erin to teach her  
15 how to wrestle. Claire always wants to learn the new moves that Erin was learning. I told Erin not  
16 to do the Reverse Neck Pinch because it is not approved by the National Wrestling Association  
17 of America for people under the age of 12. Claire did not like this. She started screaming and  
18 crying that she could do anything that Erin is allowed to do. I felt myself getting angry with Claire  
19 and left to go out to the garage. Suddenly, I got a major headache.

20 The next thing I knew, I was in the kitchen again, sitting in a chair. I heard the basement door shut  
21 and shortly after Riley was screaming for help. I hurried to the counter and Riley showed me the  
22 note. The note said not to call the police, so I told Riley that I thought we should wait to call. Riley  
23 did not listen and called anyways. I began thinking that the people who kidnapped Claire would  
24 somehow know this, and I still think they somehow found out and that is why Claire was killed.  
25 The note specifically said not to call the police and that the kidnappers were watching closely. I  
26 still can't understand why Riley ignored them and me and called anyway. It's unforgivable. I also  
27 think that the kidnappers were the two employees that I met with. I think this because of the use  
28 of TAB. That is the acronym of the company I work for. Also, the number they asked for was the  
29 exact amount I got for my project bonus.

30 While we were waiting for police, Riley and I looked around for Claire. We went outside to see if  
31 there was any sign of her. Erin stayed inside and was acting strange. Erin was super quiet and  
32 seemed to be nervous. Riley was the only person Erin would talk to.

33 When police got there, they asked us to sit and wait for the detectives, which we did. I remember  
34 speaking to Detective Hernandez. Riley gave the note to the Detective. We waited and waited  
35 when suddenly Detective Hernandez wanted to talk to all of us. While I was talking to the  
36 Detective, I started getting another headache and felt like I was going to throw up. I ran to the  
37 bathroom and didn't come back out until after the Detective was done talking to Erin.

38 After talking to us, Detective Hernandez wanted to get into the basement, but it was locked. We  
39 always lock the door when we come back up to the main house. Initially, I couldn't find the key  
40 when the Officers asked for it. I asked Erin where the key was, but Erin wasn't going to tell me.  
41 Erin is the only other person who knows where the key is. I finally got the key; I don't remember  
42 where I found it. I think Erin gave it to me, but maybe it was in the kitchen. My memory is still a  
43 bit fuzzy from that day.



1 I went down to the basement and saw Claire. I instantly picked her up, wrapped her in a blanket,  
2 and carried her upstairs. I knew she was dead, but I wanted to see if anyone could help. Detective  
3 Hernandez yelled at me that I could be contaminating evidence, but I just wanted to get Claire  
4 upstairs to safety.

5 We were informed that the officers located a footprint in the basement. The footprint was not mine  
6 or Riley's because it was far too big. The officers asked us why the two windows in the basement  
7 were open. We told them they were open because we run wires to the outside lights from the  
8 basement.

9 Officer Kowalczyk has shown me, and I recognize, Exhibit E, Exhibit F, Exhibit G, Exhibit L, Exhibit  
10 M, and Exhibit N.

11 **CERTIFICATION:** On this 15th day of June 2021, I certify, under penalty of perjury, that I have  
12 carefully reviewed the above voluntary statement to determine whether the information contained  
13 is true and accurate, and whether I had any additional information relevant to matters therein. I  
14 hereby certify, under penalty of perjury, that the report is truthful, accurate, and complete.  
15 Everything was covered and nothing was left out.

16  
17 /s/ Morgan Walker

June 15, 2021

## Dr. Alex Dixon

Dixon Diagnosis, LLC  
Family Psychiatrist  
4674 Rodeo Court  
Niki City, New Orange

### MORGAN WALKER REPORT

**SYNOPSIS:** In my professional opinion, Morgan Walker, age 55, has been diagnosed with either intermittent explosive disorder or oppositional defiant disorder, the two diagnoses are too similar to determine which occurred at this time. In my medical opinion, Erin Jasper, age 17, has also been diagnosed with either intermittent explosive disorder or oppositional defiant disorder, a specific diagnosis cannot be given at this time. If involved, Morgan Walker was either briefly or entirely unable to understand the nature of his/her actions in participating in the death of Claire Walker. Further, the investigation conducted by Detective Spencer Hernandez was not in accordance with crime scene investigation standards nor was it a full investigation.

**CASE INVOLVEMENT AND PATIENT REVIEW:** Morgan Walker has been my patient since 2018 and Erin Jasper has been my patient since 2019. Morgan Walker started seeing me after a blackout brought on by extreme anger. Erin Jasper started seeing me at the request of his/her school counselor. I continue to treat both patients and see them every two weeks in separate sessions.

**MATERIALS REVIEWED:** In addition to my own treatment notes, I reviewed the statement of Morgan Walker and all exhibits and evidence in the case file. This report includes all of my findings and conclusions.

**EVIDENTIARY REVIEW:** Since the reports in this case do not provide detailed explanations of Intermittent Explosive Disorder and Oppositional Defiant Disorder, both are recognized in the Diagnostic and Statistical Manual of Mental Disorders Fifth Edition (DSM-5). Attached to this report are the definitions of both disorders as provided by DSM-5.

**CASE ANALYSIS:** I have reviewed my treatment notes as well as all the exhibits and evidence within this case file. I have been retained to give my opinion on Morgan Walker and Erin Jasper. I have also been asked to review the investigation conducted by the New Orange Police Department and Detective Spencer Hernandez.

**MORGAN WALKER:** Morgan Walker. has been seeing me for specifically issues with anger management. Morgan frequently would have outbursts of verbal or physical aggression. While I do not have an exact number of outbursts over a period of time, there are at least 2-3 outbursts that resulted in physical harm. Morgan is also often angry and loses his/her temper very easily. Morgan is very easily annoyed and has fired people on at least two occasions for their requests of more money.

**EVENTS OF JUNE 13, 2021:** I cannot say exactly what happened on June 13, 2021 as I have not been able to interview Morgan after this incident nor was I present for the incident. However, after reviewing his/her statement, I am confident I can infer the sequence of events as they pertain to Morgan. This is my understanding of the facts. On June 13, 2021, Morgan Walker was getting Claire and Erin Jasper a snack. During this time, Claire was screaming and yelling, resulting in

1 Morgan getting annoyed. As stated earlier, Morgan is very easily annoyed. Morgan, remembering  
2 our treatment plan, began going to the basement. This is indicative of Morgan Walker being of  
3 sound and calm mind during this incident, refuting the idea that he was engaged in an outburst at  
4 this time. Morgan suddenly got a headache and then blacked out. Headaches are a sign of  
5 extreme anger and the beginning of a "black out episode." This could have also been the result  
6 of someone hitting him/her on the head. If Morgan caused Claire Walker's death, this could have  
7 been the result of the physically aggressive outburst. Morgan could have strangled Claire or  
8 pushed her off the chair she was on causing her to hit her head. However, headaches are not  
9 typical for Morgan which leads me to believe that the headache was caused by someone hitting  
10 him/her on the head, knocking him/her briefly unconscious.

11 **ERIN JASPER:** I started seeing Erin Jasper after a school counselor suggested to Riley and  
12 Morgan Walker that Erin start seeing a therapist. I had already been treating Morgan, the parent's  
13 thought that it would be better to go to someone they know.

14 When I started seeing Erin Jasper, I noted that s/he struggled to understand the rules at both  
15 school and home. This was an everyday struggle for Erin Jasper. S/he would frequently have  
16 outbursts as a result of this frustration. Erin would frequently refuse to comply with rules that s/he  
17 did know and would argue with teachers and Morgan Walker. Erin is also sensitive to Morgan  
18 Walker's criticism and would often blame other teammates at wrestling practice if s/he was unable  
19 to succeed in the match. Erin is also extremely susceptible to suggestion, meaning that s/he is  
20 very gullible and easily swayed to lie.

21 Erin has reported that s/he knew of the locked basement and how to get down there. Erin  
22 struggles with having another parental figure in the picture, specifically how to fit in and feel like  
23 their child. Erin would often go down to the basement without Morgan or Riley's knowledge and  
24 hit the punching bag or explore. When asked, Erin informed me that s/he loved sneaking down  
25 without Morgan and Riley's knowledge and had gotten quite good at it.

26 **INVESTIGATION:** Detective Spencer Hernandez did not conduct a full investigation. The New  
27 Orange Police Department officer informed him of the physical evidence collected by their  
28 Evidence Collection Unit. This evidence included an unidentified footprint, a broken window, and  
29 the ransom note. Detective Spencer Hernandez then told them to stop following the theory that  
30 someone besides the family committed this murder.

31 Detective Spencer Hernandez also relied on junk science. Handwriting analysis is not a reliable  
32 form of evidence. There are many factors that make handwriting analysis unreliable such as not  
33 being able to compare uppercase and lowercase letters; drugs, exhaustion, or illness can alter  
34 handwriting; and the age of ink and paper can alter the appearance of the lettering.

35 Had Detective Hernandez conducted a full investigation, none of the Walker family would have  
36 been accused of this horrendous crime. The physical evidence pointed to there being someone  
37 else in the home, however Detective Hernandez only focused on the Walker's.

38 This report includes all my findings and relevant conclusions. All of my opinions are stated within  
39 a reasonable degree of professional certainty.

1 **CERTIFICATION:** On this day, 15th of August 2021, I certify, under penalty of perjury, that I have  
2 carefully reviewed the above report to determine whether the information contained is true and  
3 accurate, and whether I had any additional information relevant to matters therein. I hereby certify,  
4 under penalty of perjury, that the report is truthful, accurate, and complete. Everything was  
5 covered and nothing was left out.

6  
7 /s/ Dr. Alex Dixon

August 15, 2021

## **Dr. Alex Dixon**

Dixon Diagnosis, LLC  
Family Psychiatrist  
4674 Rodeo Court  
Niki City, New Orange

### **CURRICULUM VITAE**

#### Education

- John Jay College of Criminal Justice (1980-1984)
  - B.S. in Forensic Psychology
- Yale University Medical School (1984-1988)
  - M.D.
- Yale-New Haven Medical Center (1988-1994)
  - Adult/Child Psychiatry Residency

#### Work Experience

- New York City Police Department, *Multiple Positions*
  - *Crime Scene Investigation Intern* (1982-1984)
    - Shadowed crime scene investigators and lab technicians
    - Observed over 100 crime scene investigations
  - *Crime Scene Investigator* (1984-1988)
    - Conducted over 250 crime scene investigations
    - Named Top Investigator in 1986
  - *On-Call Crime Scene Investigator* (1988-1992)
    - Would be called if there was a need for an extra Crime Scene Investigator
    - Called to about 50 crime scene investigations
- Yale-New Haven Psychiatric Hospital, *Psychiatrist* (1992 - 2010)
  - Had about 300 patients
- Dixon Diagnosis, LLC, *Family Psychiatrist* (2010 - Present)
  - Has had about 100 adult patients
  - Has had about 50 child patients

#### Certifications

- Certified Crime Scene Investigator
- Licensed in Connecticut, New York, and Pennsylvania
- Certified through the American Board of Psychiatry and Neurology
- Certified through the American Board of Medical Specialties
- Certified through the American Board of Physician Specialties

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW ORANGE**

<b>THE UNITED STATES OF AMERICA,</b>  <b>v.</b>  <b>MORGAN WALKER,</b>  <b>DEFENDANT.</b>	<b>NO. CR-082360-2021</b>  <b>THE HON. ROBERT FRANCISCO</b>
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**JURY INSTRUCTIONS**

**INTRODUCTORY INSTRUCTION.** Members of the jury, I shall now instruct you on the law that you must follow in reaching your verdict. It is your duty as jurors to decide the issues, and only those issues, that I submit for determination by your verdict. In reaching your verdict, you should consider and weigh the evidence, decide the disputed issues of fact, and apply the law on which I shall instruct you to the facts as you find them, from the evidence.

**CREDIBILITY OF WITNESSES.** You are the sole and exclusive judges of the believability of the witnesses and the weight to be given the testimony of each witness. In determining the believability of a witness, you may consider any matter that has a tendency reasonably to prove or disprove truthfulness of the testimony of the witness, including but not limited to the following. the demeanor and manner of the witness while testifying; the character and quality of that testimony; the frankness or lack of frankness of the witness; a statement previously made by the witness that is consistent with or inconsistent with the testimony of the witness; the existence or nonexistence of any fact testified to by the witness; the attitude of the witness toward this action or toward the giving of testimony and the conviction of a crime; the intelligence of the witness; the extent of the opportunity or ability of the witness to see or hear or otherwise become aware of any matter about which the witness testified; the ability of the witness to remember or to communicate any matter about which the witness testified; the existence or nonexistence of a bias, motive or interest the in the outcome of the case; and the reasonableness of the testimony of the witness, considered in light of all the evidence in the case and in light of your own experience and common sense.

**WITNESS WILFULLY FALSE.** A witness, who is willfully false in one material part of his or her testimony, is to be distrusted in others. You may reject the whole testimony of a witness who willfully has testified falsely as to a material point, unless, from all the evidence, you believe the probability of truth favors his or her testimony in other particulars.

**WEIGHING CONFLICTING TESTIMONY.** You are not required to decide any issue based solely on the number of witnesses that have testified on the opposing sides. The

testimony of one witness worthy of belief is sufficient to prove any fact. This does not mean that you are free to disregard the testimony of any witness merely from caprice or prejudice, or from a desire to favor either side. It does mean that you must not decide anything by simply counting the number of witnesses who have testified on the opposing sides. The final test is not the relative number of witnesses, but the convincing force of the evidence.

**DISCREPANCIES IN TESTIMONY.** Discrepancies in the testimony of a witness or between the testimony of one witness and that of other witnesses, if there were any, do not necessarily mean that any witness should be discredited. Failure of recollection is common. Innocent mis-recollection is not uncommon. Two persons witnessing an incident, or a transaction, often will see or hear it differently. You should consider whether a discrepancy pertains to an important matter or only to something trivial.

**EVIDENTIARY EVALUATION.** The evidence in this case consists of the sworn testimony of the witnesses, all exhibits received into evidence, and all facts that may be admitted or agreed to by the parties. In determining the facts, you may draw reasonable inferences from the evidence. You may make deductions and reach conclusions which reason and common sense lead you to draw from the facts shown by the evidence in this case, but you should not speculate on any matters outside the evidence. There are two types of evidence from which you may properly find the truth as to the facts of a case. One is direct evidence and the other is circumstantial evidence. The law makes no distinction between direct and circumstantial evidence in terms of its weight or importance. Either type may be enough to establish guilty beyond a reasonable doubt, depending on the facts as you find them to be.

**DIRECT AND CIRCUMSTANTIAL EVIDENCE.** Direct evidence is evidence of a fact based upon a witness' personal knowledge, observation or perception of that fact. A defendant's guilt of a charged crime may be proven by direct evidence if, standing alone, such evidence satisfies you beyond a reasonable doubt of the defendant's guilt. Circumstantial evidence is evidence of a fact from which a person may reasonably infer the existence or non-existence of another fact. A person's guilt of a charged crime may be proven by circumstantial evidence if that evidence, while not directly establishing guilt, gives rise to an inference of guilt beyond a reasonable doubt. Because circumstantial evidence requires the drawing of inferences, you must first decide, from all the evidence presented, what facts have been proven beyond a reasonable doubt. After doing so, you must then determine what facts, if any, can be drawn from those facts. Before you may draw an inference of guilt, however, that inference must be the only one that can fairly and reasonably be drawn from those facts. Such inference must also be consistent with the proven facts and, as noted above, must flow reasonably, naturally, and logically from them. On the other hand, if there is a reasonable hypothesis from the proven facts that is consistent with the defendant's innocence, then you must find the defendant not guilty. Conversely, if the only reasonable inference you find is that the defendant is guilty of a charged crime, and that inference is established beyond a reasonable doubt, then you must find the defendant guilty of that crime.

**PRESUMPTION OF INNOCENCE.** Throughout the trial, the defendant is presumed innocent. Therefore, you must find the defendant not guilty unless upon the evidence presented, you conclude that the prosecution has proven the defendant guilty beyond a reasonable doubt. In determining whether the prosecution has met their burden of proof, you may consider all the evidence presented, whether by the prosecution or the defendant. In doing so, however, remember that even though the defendant presented evidence, the burden of proving the defendant's guilt beyond a reasonable doubt always remains with the prosecution. Every defendant charged with a crime is presumed innocent until proven guilty beyond a reasonable doubt. The burden of proof is on the prosecution to prove the existence of all the elements necessary to constitute the crime charged beyond a reasonable doubt.

**BURDEN OF PROOF FOR THE PROSECUTION.** The Defendant does not have a burden of proof in this case. Only the Prosecution has the burden of proof. When I tell you that a party must prove something, I mean the party must persuade you, by evidence presented in court, that he or she is trying to prove is more likely to be true than not. This is sometimes referred to as "the burden of proof." After weighing all the evidence, if you cannot decide whether a party has satisfied the burden of proof, you must conclude that the party did not prove that fact. You should consider all the evidence that applies to that fact, no matter which party produced that evidence. In criminal trials, the prosecution must prove facts showing that the defendant is guilty beyond a reasonable doubt.

**REASONABLE DOUBT.** Reasonable doubt means a doubt based upon reason and common sense which arises from a fair and rational consideration of all of the evidence, or the lack of evidence, in the case. It is a doubt which is not a vague, speculative, or imaginary doubt, but such a doubt as would cause reasonable people to hesitate to act in matters of importance to themselves. If you find, from the evidence, that every element has been proven beyond a reasonable doubt, you will find the defendant guilty. If you find from the evidence that the prosecution has failed to prove any one or more of the elements beyond a reasonable doubt you will find the defendant not guilty.

**MENTAL CULPABILITY AND CRIMINAL COUNTS.** The charges involve crimes requiring different types of mental culpability. A conspiracy is an agreement, express or implied, between two or more persons to commit a criminal act or series of criminal acts. A person is guilty of conspiracy if with the purpose of promoting or facilitating the commission of a crime, s/he agrees with such a person or persons, that they will engage in conduct that constitutes a crime or agrees to aid such other person or persons in planning or committing such crime. A person acts "intentionally" or "with intent" when her/his conscious objective is to cause the specific result proscribed by the statute defining the offense. It is immaterial whether or not the result actually occurred. A person acts "willfully" with respect to conduct or to a circumstance described by a statute defining an offense when s/he is aware that her/his conduct is of such nature or that such a circumstance exists. A person acts "willfully", with respect to a result of her/his conduct, when s/he is aware that his conduct is practically certain to cause the result.



**APPLICABLE LAW: COUNT ONE. 21 OPC § 125.25. MURDER IN THE SECOND DEGREE:** Count One is Murder in the Second Degree. Under our law, a person is guilty of Murder in the Second Degree when, with intent to cause the death of another person, he or she causes the death of such person. INTENT means conscious objective or purpose. Thus, a person acts with intent to cause the death of another when that person's conscious objective or purpose is to cause the death of another. In order for you to find the Defendant guilty of this crime, the People are required to prove, from all the evidence in the case, beyond a reasonable doubt, both the following two elements: [1] that on or about June 13, 2021, in the county of Orange, the defendant, Morgan Walker, caused the death of Claire Walker; and [2] that the defendant did so with the intent to cause the death of Claire Walker.

**APPLICABLE LAW: COUNT TWO. 21 OPC § 125.20. MANSLAUGHTER IN THE FIRST DEGREE.** Count Two is Manslaughter in the Second Degree. Under our law, a person is guilty of Murder in the Second Degree when, with intent to cause the death of another person, he or she causes the death of such person. INTENT means conscious objective or purpose. Thus, a person acts with intent to cause the death of another when that person's conscious objective or purpose is to cause the death of another. In order for you to find the Defendant guilty of this crime, the People are required to prove, from all the evidence in the case, beyond a reasonable doubt, both the following two elements: [1] that on or about June 13, 2021, in the City of Syracuse, County of Onondaga, and State of New Orange, the defendant, Morgan Walker, caused the death of Claire Walker; and [2] that the defendant did so with the intent to cause the death of Claire Walker.

**AFFIRMATIVE DEFENSE:** When a defendant is charged with a crime which requires a specified intent be established in order to constitute the crime, you must take all the evidence into consideration and determine therefrom if, at the time when the alleged crime was committed, the defendant was suffering from some abnormal mental or physical condition which prevented the defendant from forming the specific intent, which is an essential element of the crime with which the defendant is charged. The defendant has asserted an affirmative defense. This does not bar the defendant from challenging his/her guilt in any form. However, the defendant may also assert that at the time of the offense, the defendant had a mental disease or defect that rendered the defendant incapable of appreciating the quality and nature what the defendant was doing at the time. The defendant must prove the presence of a severe mental condition that stopped the defendant from fully understanding the nature of the defendant's actions or the wrongfulness of the defendant's conduct by a preponderance of the evidence. A preponderance of the evidence is not as high a burden as beyond reasonable doubt. A preponderance of the evidence requires that the evidence being presented must be more likely than not.

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW ORANGE

<p style="text-align: center;"><b>THE UNITED STATES OF AMERICA,</b></p> <p style="text-align: center;"><b>v.</b></p> <p style="text-align: center;"><b>MORGAN WALKER,</b></p> <p style="text-align: center;"><b>DEFENDANT.</b></p>	<p style="text-align: center;"><b>NO. CR-082360-2021</b></p> <p style="text-align: center;"><b>THE HON. ROBERT FRANCISCO</b></p>
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**JURY VERDICT FORM A**

**COUNT ONE.** On the first count of **MURDER IN THE SECOND DEGREE**, we, the jury, find the defendant **MORGAN WALKER** (CHECK ONLY ONE OF THE THREE RESPONSES BELOW AND THEN MOVE TO COUNT TWO).

\_\_\_\_\_ **GUILTY.**

\_\_\_\_\_ **NOT GUILTY.**

\_\_\_\_\_ **NOT GUILTY BY REASON OF INSANITY.**

**COUNT TWO.** On the second count, Manslaughter in the First Degree, we, the jury, find the defendant, **MORGAN WALKER** (CHECK ONLY ONE OF THE THREE RESPONSES AND THEN REPORT YOUR VERDICT TO THE COURT).

\_\_\_\_\_ **GUILTY.**

\_\_\_\_\_ **NOT GUILTY.**

\_\_\_\_\_ **NOT GUILTY BY REASON OF INSANITY.**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW ORANGE

<p><b>THE UNITED STATES OF AMERICA,</b></p> <p style="text-align: center;"><b>v.</b></p> <p><b>MORGAN WALKER,</b></p> <p style="text-align: right;"><b>DEFENDANT.</b></p>	<p><b>NO. CR-082360-2021</b></p> <p><b>THE HON. ROBERT FRANCISCO</b></p>
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**JURY VERDICT FORM B**

**COUNT ONE.** On the first count of **MURDER IN THE SECOND DEGREE**, we, the jury, find the defendant **MORGAN WALKER** (CHECK ONLY ONE OF THE THREE RESPONSES BELOW AND THEN REPORT YOUR VERDICT TO THE COURT).

- \_\_\_\_\_ **GUILTY.**
- \_\_\_\_\_ **NOT GUILTY.**
- \_\_\_\_\_ **NOT GUILTY BY REASON OF INSANITY.**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW ORANGE

<p><b>THE UNITED STATES OF AMERICA,</b></p> <p style="text-align: center;"><b>v.</b></p> <p><b>MORGAN WALKER,</b></p> <p style="text-align: right;"><b>DEFENDANT.</b></p>	<p><b>NO. CR-082360-2021</b></p> <p><b>THE HON. ROBERT FRANCISCO</b></p>
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**JURY VERDICT FORM C**

**COUNT TWO.** On the second count, Manslaughter in the First Degree, we, the jury, find the defendant, **MORGAN WALKER** (CHECK ONLY ONE OF THE THREE RESPONSES AND THEN REPORT YOUR VERDICT TO THE COURT).

\_\_\_\_\_

**GUILTY.**

\_\_\_\_\_

**NOT GUILTY.**

\_\_\_\_\_

**NOT GUILTY BY REASON OF INSANITY.**