

COUNTY OF MCLENNAN)
)
STATE OF TEXAS)

DECLARATION OF PATRICIA CHISOLM-MILLER

1. My name is Patricia Chisolm-Miller. I am over the age of 18 and otherwise competent to give this declaration.
2. I am currently the County Commissioner for Precinct 2 in McLennan County. I currently live in East Waco and I have lived in Waco, Texas for 50 years.
3. I remember Rickey Cummings from when I taught him in elementary school. He was a quiet student and I do not remember him causing me any problems.
4. I remember when Rickey went to trial for the Spring Street murders. I followed the trial as best I could. One of the things that sticks out in my memory from that case is how the State portrayed Waco, East Waco, as a gang-infested crime area. I live in East Waco. I have lived there for 50 years and that is not an accurate representation. We do not have the type of gang problems that the State portrayed. I felt like that was a way to play on the fears of the community, even though it was factually incorrect. This was especially evident during the actual trial when you would see police officers and law enforcement personnel all over the courthouse, leading people to believe that this case in particular, was extremely dangerous because of the State's exaggerated belief of gang activity and involvement.
5. Another memory that sticks out in my mind in Rickey Cummings' case is the problems with the investigation. To my understanding, based on formal meetings with family members associated with both Mr. Bowers' case and Rickey Cummings case, and meeting with local pastors there was some type of personal/intimate relationship between Investigator Steve January and someone in Keenan Hubert's family. I do not know if that is true, but I do know it is a commonly understood and believed relationship.
6. Thinking back on Rickey's case, I am troubled by the lack of evidence that was presented to convict and sentence him to death. I understand the State's case relied on misrepresentations of East Waco, supposed gang activities, and farcical rap videos that did not have anything to do with Rickey's case. I was also troubled by the State's reliance on an unreliable witness, whom they should have suspected had no credibility based on her physical and mental condition.
7. No lawyers for Rickey's defense ever contacted me, either during his trial or since then. If they had, I would have provided the same information as I have now, and I would have testified on Rickey's behalf.

My name is Patricia Chisolm-Miller, my date of birth is [REDACTED], 1958, and my address is [REDACTED] Street, [REDACTED] Waco, Texas [REDACTED]. I have read all seven paragraphs of the above statement and I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 12th day of March 2019.

Patricia Chisolm-Miller
Patricia Chisolm-Miller

Initials *PC*