DATE

**Texas State Attorney General**

**Ken Paxton**

Office of the Attorney General

PO Box 12548

Austin, TX 78711-2548

(512) 463-2100

**A Request for Capital Case Review: Robert Will #999402**

Dear Mr. Paxton,

I am writing to you today with concern regarding the case of Robert Will #999402, who sits on Texas Death Row for a crime I don’t believe he committed. I am very disturbed that Mr. Will could be executed, despite the evidence that supports his innocence and the fact that he did not receive a fair and unbiased trial. If you review the case facts I have listed below, I am certain you will come to the same conclusion that Mr. Will played no part in Deputy Hill’s death.

Mr. Will was arrested in 2000 for Capital Murder of Houston Sheriff’s deputy, Barrett Hill, despite police radio logs confirming he was handcuffed and “in custody” at the time of the shooting.

**No forensic evidence or eye-witnesses support Mr. Will being the shooter.**

The actual shooter – the son of a prominent Houston police officer – was charged only with auto theft despite:

* He shot Mr. Will in the hand at the time of the killing.
* While in county jail, he confessed to **numerous witnesses** that he murdered the deputy. These witnesses have all signed sworn affidavits attesting to his confession.
* He bleached all of his bloody clothes before providing them to the police.
* He tried to put a hit on Mr. Will in county jail. These jail house records were not disclosed to defense at trial –

a clear Maryland v. Brady violation.

At trial, Mr. Will was provided with court appointed public defenders while prosecuted by Houston’s highest-ranking district attorney. His trial included issues with:

* Defense witness intimidation
* Prosecution withholding important evidence from the defense (Maryland v. Brady violation stated above)
* An overwhelming amount of uniformed police presence in the room. A Houston police department newsletter published one month prior to Mr. Will’s trial stated, “This is a reminder for as many uniformed deputies, that can be there, attend.”
* The prosecutor compared Mr. Will to the 9/11 terrorists

Mr. Will’s appeals have been ridden with issues, including being appointed a direct appeal lawyer suffering from Parkinson’s disease; who copied and pasted his appeal directly from that of a Texas serial killer (typos included). It was, of course, denied.

Unfortunately, due to the appeal restrictions imposed by the Anti-Terrorism and Effective Death Penalty Act (AEDPA), the vast majority of issues within Mr. Will’s wrongful conviction needed to have been raised on earlier appeal. Due to ineffective counsel, this did not happen.

I strongly urge you to please take direct and quick action in the case and life of Robert Will, in the name of true and fair justice. An innocent man could very well be executed if someone, like you, does not intervene soon.

I am grateful for your time and attention to this very serious and urgent case.

Yours sincerely,

Your Name

Your City, State / Country