

SPECIAL FINDING II

MITIGATING FACTORS

For each of the following proposed non-statutory mitigating factors, indicate in the space provided the number of jurors who find that the defendant has proved by a preponderance of the evidence the existence of such factor and that it is mitigating.

1. Christopher Cramer never had a stable home; rather, he was moved to numerous residences in his childhood.

Number of jurors who so find 5.

2. Christopher Cramer never had a relationship with his biological father.

Number of jurors who so find 1.

3. Christopher Cramer's mother abused alcohol and illicit substances during her pregnancy with him.

Number of jurors who so find 9.

4. Christopher Cramer's mother told him he was born a crack baby.

Number of jurors who so find 0.

5. Christopher Cramer was raised in a dysfunctional family.

Number of jurors who so find 10.

6. Christopher Cramer was raised in a family of violence.

Number of jurors who so find 12.

7. Christopher Cramer was raised in a family of drug abuse and sexual abuse.

Number of jurors who so find 9.

8. Christopher Cramer was raised in a noxious environment.

Number of jurors who so find 0.

9. Christopher Cramer was raised in a toxic environment.

Number of jurors who so find 3.

10. Christopher Cramer's mother abandoned Christopher Cramer and his siblings repeatedly.

Number of jurors who so find 9.

11. Christopher Cramer's mother meted out abusive punishments to him and his siblings.

Number of jurors who so find 0.

12. Christopher Cramer's mother whipped her children with paddles, extension cords, fishing rods, and belts.

Number of jurors who so find 0.

13. Christopher Cramer was the sibling who bore the brunt of the abuse in the home as a child.

Number of jurors who so find 3.

14. There was widespread criminal conduct within Christopher Cramer's family.

Number of jurors who so find 12.

15. Christopher Cramer's mother engaged in prostitution around him while he was a child.

Number of jurors who so find 6.

16. Christopher Cramer's mother engaged in drug abuse around him while he was a child.

Number of jurors who so find 6.

17. Christopher Cramer witnessed men assault his mother on multiple occasions.

Number of jurors who so find 8.

18. Christopher Cramer observed his mother and her husband Terry Keys fighting and beating each other weekly.

Number of jurors who so find 0.

19. Christopher Cramer observed his mother stab or slice her husband Terry Keys with a knife.

Number of jurors who so find 0.

20. At a young age of eleven or twelve, Christopher Cramer pulled a knife on Terry Keys to try and stop him from assaulting Christopher Cramer's mother.

Number of jurors who so find 8.

21. At the time he was trying to protect his mother, Christopher Cramer was more fearful for his mother than himself.

Number of jurors who so find 0.

22. When he was a young teenager, Christopher Cramer defended his mother from an assault by striking the man who had beaten her severely with a rebar.

Number of jurors who so find 4.

23. Christopher Cramer felt like he could protect his mother from assaults after striking the man who had severely beaten her.

Number of jurors who so find 0.

24. When Christopher Cramer was fifteen years old, he felt like a grown man because he could protect his mother.

Number of jurors who so find 0.

25. When Christopher Cramer was fifteen years old, he felt like he could take care of himself.

Number of jurors who so find 60.

26. Christopher Cramer's mother owed drug debts and made him provide protection for her, including arming him with a weapon to protect her.

Number of jurors who so find 0.

27. Christopher Cramer thought protecting his mother from drug dealers was normal because it was all he knew.

Number of jurors who so find 0.

28. Christopher Cramer lived in seedy hotels, apartments, and vehicles in poverty as a child.

Number of jurors who so find 7.

29. Christopher Cramer had educational deficits, including being diagnosed with a learning disorder as a child.

Number of jurors who so find 0.

30. Christopher Cramer was placed in special education as a child.

Number of jurors who so find 0.

31. Christopher Cramer dropped out of school at the conclusion of the ninth grade.

Number of jurors who so find 0.

32. Christopher Cramer's intellectual ability is in the lower 20% of the population.

Number of jurors who so find 0.

33. While living in California as a teenager, Christopher Cramer was exposed to gangs.

Number of jurors who so find 10.

34. While living in California as a teenager, Christopher Cramer was exposed to fights.

Number of jurors who so find 0.

35. While living in California as a teenager, Christopher Cramer was exposed to pimps beating their prostitutes.

Number of jurors who so find 0.

36. While living in California as a teenager, Christopher Cramer was exposed to finding a dead body in an alleyway.

Number of jurors who so find 0.

37. Christopher Cramer went to live with Lorenzo Hubbard because he wanted a more stable home.

Number of jurors who so find 0.

38. Christopher Cramer viewed Lorenzo Hubbard as his father.

Number of jurors who so find 0.

39. When Lorenzo Hubbard passed away, it had a great detrimental effect on him.

Number of jurors who so find 0.

40. Lorenzo Hubbard was a bad role model for Christopher Cramer.

Number of jurors who so find 9.

41. Lorenzo Hubbard taught Christopher Cramer to use drugs at an early age.

Number of jurors who so find 0.

42. Lorenzo Hubbard used Christopher Cramer as a "door man" for his drug dealing when Christopher Cramer was a child.

Number of jurors who so find 0.

43. Christopher Cramer knew Lorenzo Hubbard was a pimp, running prostitutes.

Number of jurors who so find 0.

44. Lorenzo Hubbard was the pimp for Christopher Cramer's mother, Darla Dillon.

Number of jurors who so find 0.

45. Christopher Cramer looked up to his older brother, Ronald McElroy.

Number of jurors who so find 0.

46. Ronald McElroy was not a positive role model for Christopher Cramer because of Ronald McElroy's drug dealing and criminal activities, which he modeled for Christopher Cramer.

Number of jurors who so find 9.

47. Ronald McElroy used Christopher Cramer as a "door man" for his drug dealing when Christopher Cramer was a child.

Number of jurors who so find 0.

48. Christopher Cramer's mother failed to protect him from assaults by the men in her life.

Number of jurors who so find 8.

49. The only stable role model in Christopher Cramer's life was his grandmother, Joella Hubbard.

Number of jurors who so find 0.

50. Christopher Cramer loved his grandmother deeply.

Number of jurors who so find 0.

51. When Christopher Cramer's grandmother passed away, it had a great detrimental effect on him.

Number of jurors who so find 6.

52. Christopher Cramer and his siblings thought the dysfunctional lifestyle they lived was a normal life, because it was the only life they knew.

Number of jurors who so find 7.

53. The environment in which Christopher Cramer was raised contributed to his behavior as an adult.

Number of jurors who so find 12.

54. If Christopher Cramer had been raised in a normally functioning family, he likely would not be in the situation he is facing today.

Number of jurors who so find 0.

55. Christopher Cramer developed a marijuana dependency as a child.

Number of jurors who so find 0.

56. Christopher Cramer developed a methamphetamine addiction as a child.

Number of jurors who so find 0.

57. Christopher Cramer learned to cope with life by the violence he experienced as a child.

Number of jurors who so find 12.

58. Christopher Cramer learned to cope in prison by violence because that is how he was taught to cope with his dysfunctional life.

Number of jurors who so find 5.

59. Christopher Cramer suffers from a mental illness, Antisocial Personality Disorder.

Number of jurors who so find 0.

60. The mental illness from which Christopher Cramer suffers, Antisocial Personality Disorder, is not a result of his choice.

Number of jurors who so find 0.

61. Christopher Cramer suffers from a mental illness, Attention Deficit Hyperactivity Disorder ("ADHD").

Number of jurors who so find 0.

62. The mental illness from which Christopher Cramer suffers, ADHD, is not a result of his choice.

Number of jurors who so find 0.

63. The psychiatric diagnoses for Christopher Cramer include specific trauma and related stress disorder with a history of complex trauma.

Number of jurors who so find 0.

64. Disorganized attachment and polytrauma had a significant effect on Christopher Cramer.

Number of jurors who so find 9.

65. In his upbringing, Christopher Cramer had a number of individual risk factors as identified in Department of Justice Office of Juvenile Justice and Delinquency Prevention publications.

Number of jurors who so find 5.

66. Christopher Cramer's evaluation under the Adverse Childhood Experiences study ("ACE") indicates that he suffered eleven risk factors.

Number of jurors who so find 7.

67. Christopher Cramer's evaluation under the ACE indicates that he suffered cumulative effects from the multiple risk factors he experienced.

Number of jurors who so find 8.

68. Christopher Cramer's cumulative ACE score results in a negative relationship to numerous health, social, and behavioral issues throughout his lifespan.

Number of jurors who so find 7.

69. The neurodevelopmental condition of ADHD, the effects of concussions, and early trauma placed Christopher Cramer's brain at risk for impaired development as well as deficits in emotional, cognitive, behavioral, and psychological functioning.

Number of jurors who so find 0.

70. The combination of mental illnesses from which Christopher Cramer suffers contributed to his current situation.

Number of jurors who so find 1.

71. Based on Christopher Cramer's upbringing, he had no chance of success in life.

Number of jurors who so find 4.

72. Christopher Cramer assumed the parenting role and responsibility of tending to the needs of siblings while he was a child, at an age when he himself needed parenting and someone to tend to his needs.

Number of jurors who so find 8.

73. Christopher Cramer stole food as a child to feed his siblings.

Number of jurors who so find 0.

74. Christopher Cramer assumed the role of protector in his family.

Number of jurors who so find 7.

75. Christopher Cramer provided emotional support to his sister Chaminque Porter when they were children.

Number of jurors who so find 0.

76. Christopher Cramer saved Chaminque Porter from being abducted when they were children.

Number of jurors who so find 0.

77. Christopher Cramer continues to provide emotional support to Chaminque Porter.

Number of jurors who so find 0.

78. Christopher Cramer provided emotional support to Angel Anderson when they were children.

Number of jurors who so find 0.

79. Christopher Cramer continues to provide emotional support to Angel Anderson.

Number of jurors who so find 0.

80. Christopher Cramer provides emotional support to Angel Anderson's daughter, Kimberly Anderson.

Number of jurors who so find 0.

81. Christopher Cramer was a good brother to Diamante Hubbard when they were children.

Number of jurors who so find 0.

82. Diamante Hubbard still looks up to Christopher Cramer as his big brother.

Number of jurors who so find 0.

83. Christopher Cramer was a good brother to Lorenzo Hubbard Davis when they were children.

Number of jurors who so find 0.

84. Lorenzo Hubbard Davis still looks up to Christopher Cramer as his big brother.

Number of jurors who so find 0.

85. Hortensia White loved Christopher Cramer as if he was her own son when he was a child.

Number of jurors who so find 0.

86. Christopher Cramer was a wonderful child.

Number of jurors who so find 0.

87. Christopher Cramer was loved by everyone around him as a child.

Number of jurors who so find 0.

88. Hortensia White still loves Christopher Cramer.

Number of jurors who so find 0.

89. Christopher Cramer loves his family deeply.
Number of jurors who so find 0.
90. Christopher Cramer's family loves him deeply.
Number of jurors who so find 0.
91. Christopher Cramer has redeeming qualities.
Number of jurors who so find 0.
92. Christopher Cramer tried to better himself by working at Job Corps.
Number of jurors who so find 0.
93. Christopher Cramer tried to better himself by applying to the military.
Number of jurors who so find 0.
94. Christopher Cramer never treated his black family members with any racial discrimination.
Number of jurors who so find 0.
95. Christopher Cramer is not a racist.
Number of jurors who so find 0.
96. Christopher Cramer apologized to family members for the hate displayed by his tattoos.
Number of jurors who so find 0.
97. According to family members, Christopher Cramer has tattoos as a facade.
Number of jurors who so find 0.
98. According to family members, Christopher Cramer's tattoos are a smokescreen.
Number of jurors who so find 0.

99. Christopher Cramer became an inmate in the Federal Bureau of Prisons ("BOP") at a young age.

Number of jurors who so find 12.

100. Christopher Cramer expressed remorse for causing emotional trauma to the bank employees in his robbery that sent him to prison at a young age.

Number of jurors who so find ~~12~~ 1⁰⁰.

101. Life for inmates in the BOP is characterized as a world where up is down, down is up, right is wrong, and wrong is right, according to the government's witness, BOP SIS Officer Nysten.

Number of jurors who so find 0.

102. Inmates in the BOP settle disputes among themselves.

Number of jurors who so find 0.

103. Christopher Cramer tried to better himself in prison by getting his GED.

Number of jurors who so find 0.

104. Christopher Cramer associated with African-Americans when he entered prison.

Number of jurors who so find 0.

105. Christopher Cramer was assaulted by a Hispanic gang when he entered prison.

Number of jurors who so find 12.

106. When Christopher Cramer was assaulted in prison, his African-American friends did not come to his aid.

Number of jurors who so find 12.

107. When Christopher Cramer was assaulted in prison, a white supremacy group came to his aid.

Number of jurors who so find 12.

108. Christopher Cramer was himself stabbed while in prison.
Number of jurors who so find 5.
109. Christopher Cramer joined the Soldiers of Aryan Culture ("SAC") in need of protection.
Number of jurors who so find 10.
110. Christopher Cramer joined SAC in need of a family in prison.
Number of jurors who so find 8.
111. Christopher Cramer is opposed to the use of alcohol and drugs in his prison gang.
Number of jurors who so find 0.
112. Inmate Leo Johns was disrespectful to Christopher Cramer in violation of gang rules.
Number of jurors who so find 5.
113. Inmate Leo Johns provoked the offense on June 9, 2014, by referring to SAC as "Fuck them Dudes."
Number of jurors who so find 7.
114. Gang rules required Christopher Cramer to take action against inmate Leo Johns.
Number of jurors who so find 10.
115. Christopher Cramer had to act against inmate Leo Johns to avoid placing himself in danger.
Number of jurors who so find 6.
116. Christopher Cramer did not harm any corrections officers or staff in the commission of the offense.
Number of jurors who so find 0.

117. Christopher Cramer has committed no violent act in prison since the death of Leo Johns on June 9, 2014.

Number of jurors who so find 0.

118. Because of his federal conviction for the murder of inmate Leo Johns, Christopher Cramer will never be eligible for release.

Number of jurors who so find 0.

119. Christopher Cramer has never previously been charged with or convicted of the offense of murder.

Number of jurors who so find 0.

120. There are alternatives in the BOP to protect inmates and staff other than executing Christopher Cramer.

Number of jurors who so find 0.

121. In 15 years of incarceration, Christopher Cramer has never assaulted a prison staff member or corrections officer.

Number of jurors who so find 10.

122. Since the offense, Christopher Cramer has been housed in Medium and Low Units in the BOP.

Number of jurors who so find 0.

123. When housed in the Special Housing Units rather than being in general population, BOP psychologists have determined Christopher Cramer's threat level to others to be Low.

Number of jurors who so find 0.

124. After the offense, the BOP approved Christopher Cramer for transfer to the Administrative-Maximum United States Penitentiary ("ADX").

Number of jurors who so find 0.

125. Christopher Cramer adapted well to incarceration while housed at ADX.

Number of jurors who so find 0.

126. Christopher Cramer is happy at ADX.
Number of jurors who so find 0.
127. The BOP has the discretion to keep Christopher Cramer at ADX for however long is necessary.
Number of jurors who so find 0.
128. The BOP is capable of fashioning conditions of confinement that will control Christopher Cramer's activities until his death in prison.
Number of jurors who so find 0.
129. ADX is the most secure prison in the United States.
Number of jurors who so find 0.
130. At ADX, every inmate lives in a cell alone.
Number of jurors who so find 0.
131. At ADX, staff apply handcuffs and leg shackles without entering Christopher Cramer's cell.
Number of jurors who so find 0.
132. At ADX, Christopher Cramer will only leave his cell after a shakedown and being searched with a metal detector.
Number of jurors who so find 0.
133. At ADX, Christopher Cramer will never be moved from his cell unless he is wearing handcuffs connected to a chain around his waist while two correctional officers armed with tactical batons and pepper spray escort him.
Number of jurors who so find 0.
134. At ADX, Christopher Cramer is only moved from his cellblock if he is wearing handcuffs connected to a chain around his waist and leg irons while three correctional officers armed with tactical batons and pepper spray escort him.
Number of jurors who so find 0.

135. At ADX, Christopher Cramer is allowed to recreate only one hour per day alone outside of his cell.

Number of jurors who so find 0.

136. At ADX Control Unit and ADX General Population, Christopher Cramer can have no physical contact with any other inmate.

Number of jurors who so find 0.

137. At ADX, Christopher Cramer is extremely limited in his ability to communicate with any person inside or outside the institution.

Number of jurors who so find 0.

138. Staff at ADX have the ability to eliminate completely any communication by Christopher Cramer with any other person, inside or outside of the institution, if they deem it necessary.

Number of jurors who so find 0.

139. The Control Unit at ADX is an even more secure portion of the ADX institution.

Number of jurors who so find 0.

140. The conditions of confinement to which Christopher Cramer will be subjected will be severe punishment for the rest of his life.

Number of jurors who so find 0.

141. Christopher Cramer has already been sentenced to the Control Unit for a 74-month term.

Number of jurors who so find 0.

142. If Christopher Cramer commits any infraction, no matter how small, he loses credit on his sentence to the Control Unit for that month.

Number of jurors who so find 0.

143. Even if Christopher Cramer commits no infraction, he can be kept in the Control Unit at the discretion of ADX officials.

Number of jurors who so find 0.

144. There are inmates in the ADX who have been incarcerated there for 24 years since it opened, who were in lockdown before being transferred there.

Number of jurors who so find 0.

145. Even if Christopher Cramer commits no infractions and has exemplary behavior at ADX, the officials at ADX have the discretion to keep him incarcerated there.

Number of jurors who so find 0.

146. The “kite” written by Christopher Cramer mentioning being “back on a yard” will prevent him from ever being released from ADX.

Number of jurors who so find 0.

147. Christopher Cramer’s gang status in SAC will prevent him from being released from ADX.

Number of jurors who so find 0.

148. Research shows that the longer a person is in prison, the less likely it is that he will engage in misconduct.

Number of jurors who so find 0.

149. Research shows that the longer a person is in a gang, the less likely that he will engage in misconduct.

Number of jurors who so find 0.

150. Research shows that as an inmate ages, he tends to settle down and take fewer risks.

Number of jurors who so find 0.

151. Inmates with sentences of life without parole have a lower incidence of violence than inmates with shorter sentences.

Number of jurors who so find 0.

152. The BOP has the capability to house Christopher Cramer in ADX and ensure the safety of him, other inmates, and staff.

Number of jurors who so find 0.

The following extra spaces are provided to write in additional mitigating factors, if any, found by any one or more jurors. If none, write "NONE." If more space is needed, write "CONTINUED" and use the reverse side of this page.

____. None

Number of jurors who so find _____.

____. None

Number of jurors who so find _____.

____. None

Number of jurors who so find _____.

____. None

Number of jurors who so find _____.

6/12/18
Date

[REDACTED]
Jury Foreperson

Regardless of how you answered in response to Special Finding II, proceed to Special Finding III, which follows.

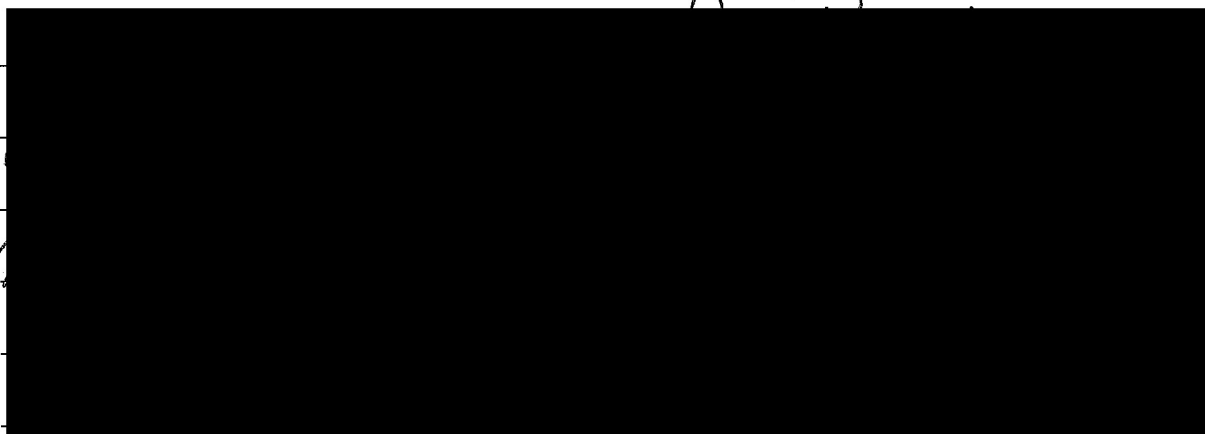
SPECIAL FINDING III

SELECTION OF PUNISHMENT

Based upon our consideration of whether the aggravating factors found to exist sufficiently outweigh any mitigating factor(s) found to exist, or in the absence of any mitigating factors, whether the aggravating factors are themselves sufficient to justify a sentence of death, and whether death is therefore the appropriate sentence in this case, we, the jury, determine by unanimous vote, that the following sentence shall be imposed on Defendant Christopher Cramer as to Count I of the Superseding Indictment:

DEATH PENALTY X

LIFE IMPRISONMENT WITHOUT THE POSSIBILITY OF RELEASE _____



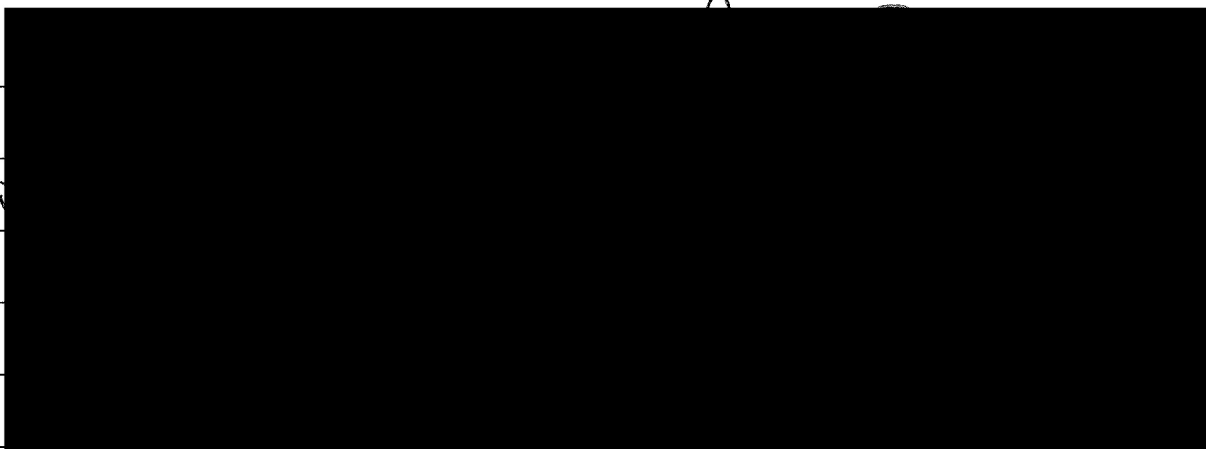
6/13/18
Date

After each juror has signed Special Finding III, proceed to Special Finding IV, which follows.

SPECIAL FINDING IV

JURY CERTIFICATION

By my signature below, I certify that considerations of race, color, religious beliefs, national origin, or sex of the defendant or the victim were not involved in reaching these findings. I further certify that I would have made these findings regardless of the race, color, religious beliefs, national origin, or sex of either the defendant or the victim.



06/13/18
Date

After each juror has signed this Certification, let the court security officer know that you have reached a verdict.