

AFFIDAVIT

STATE OF LOUISIANA §  
§  
PARISH OF ORLEANS §

**BEFORE ME**, the undersigned Notary Public, personally came and appeared:

**DERWYN BUNTON**, who after being duly sworn did depose and state the following:

1. I am the Chief District Defender for Orleans Public Defenders (OPD). I have been the Chief District Defender since 2009. OPD represents poor children and adults charged with a crime in four different courthouses: Criminal District Court, Municipal Court, Traffic Court, and Juvenile/Family Court. OPD is the primary provider of public defense services in Orleans Parish. OPD represents nearly 85% of individuals charged with a crime in Criminal District Court.
2. Twelve elected district court judges preside over Criminal District Court. Each judge is elected to a specific section of court from A to L, and they only preside over criminal cases, primarily felony cases. Based upon the date of the alleged criminal conduct, the case is allotted to one of the twelve sections of Criminal District Court. Each of the twelve judges presides over their own criminal dockets and oversees case processing from arraignment to sentencing. No one judge begins court at the same time each day. Judges take their respective benches anytime between 8 am to 11 am.
3. A thirteenth elected magistrate judge presides over the Magistrate Section of Criminal District Court. This magistrate judge presides over first appearances (probable cause determination and initial bond setting), bond reviews and pre-acceptance/indictment preliminary examinations. The magistrate judge presides over section M-1 and four magistrate commissioners appointed by the en banc Criminal District Court assists the magistrate judge handle afternoon, evening and weekend first appearances where probable cause determinations and bonds are set within 24 hours of arrest.
4. One OPD attorney provides representation to all arrested persons at first appearances three times a day (10 am, 3 pm, 8 pm) and twice on weekends and holidays. Every attorney, with the exception of me, rotates through first appearances coverage. If OPD is appointed to an arrestee at first appearances, within 12-24 hours of that first appearance, the case is assigned to an attorney, and the attorney is required to visit that client within 48 hours of assignment. The assigned attorney will represent that client from assignment to sentencing.
5. In Louisiana, La. C. Cr. P. art. 701 allows the state 45 days on a misdemeanor, 60 days on a felony, and 120 days on a life without the possibility of parole ("LWOP") case to accept or refuse charges after arrest if the defendant remains in custody. Each of those timelines is lengthened if the defendant is released on bond. The prosecution may accept cases by bill of information or grand jury indictment; LWOP cases must be indicted. Because OPD is appointed at first appearances after arrest, our policy is to represent the accused pre-acceptance. That representation can include filing of bond reduction motions, conducting preliminary examinations, conducting investigations, and negotiating dispositions with the prosecution pre-acceptance.
6. Because accepted cases are allotted to one of twelve sections, OPD attorneys have cases pending in many sections of court. We try to limit the number of sections attorneys have open cases by organizing attorneys into three clusters with each cluster picking up cases from four sections of court. However, due to case transfers and re-allotments due to rearrests and other circumstances, attorneys have open cases in more than four sections of court, and daily find themselves



running to and from 2-4 sections of court for arraignments, discovery hearings, substantive evidentiary hearings such motions to suppress evidence, statement and ID, preliminary examinations, hearings regarding the admission of other crimes evidence, and other court proceedings. In Louisiana, almost all cases that do not plead early on in the life of the case will have substantive hearings at which one or more investigating police officers will testify to establish probable cause or regarding evidentiary issues such as suppression. Those hearings generally last anywhere from twenty minutes to several hours depending on the complexity of the case, number of co-defendants, and number of necessary witnesses.

7. It is possible for an attorney to spend a full day in court handling cases: from 8 am in Section L to 5-6 pm covering afternoon first appearances in magistrate court or afternoon Municipal Court coverage as explained below. Typically, attorneys spend 8 to 1 pm in court, afternoons attempting to visit clients in jail, and evenings preparing for the next day. For example, Thomas Frampton spent 30.5 hours in court during the week of August 31, 2015. During the same week, Mariah Holder spent 15.5 hours in court and Zack Carpenter spent 19 hours in court, leaving all of them very little time outside of court to visit clients, review discovery, conduct investigations, legal research, and prepare for hearings and trials.
8. Both Municipal Court and Traffic Court are presided over by 4 elected judges who serve part-time. Each of the eight judges can also maintain a private legal practice. For both courts, two judges sit in the morning and two sit in the afternoon starting at 2-3 pm. Attorneys with open cases in Criminal District Court and Municipal Court may be in court from 8 am to 5-6 pm, leaving an hour or two in the middle of the day for case preparation and evenings for jail visits and preparation for next day.
9. In 2010, OPD and Loyola University School of Law sued the Orleans Parish Sheriff in state Civil District Court for failing to provide reasonable visitation hours and private, confidential areas for attorney-client visits. OPD entered into a stipulated judgment with the Sheriff in 2011, however, problems with visitation persist. Attorneys consistently wait well over an hour to see their first requested client in jail. Even when they call ahead and schedule an appointment at a set time, they wait upon arrival at the jail because information about their scheduled appointment was never communicated to deputies responsible for transport and coordination of visit. Even after one visit is done, there is often a similar delay before subsequent clients are brought. The Sheriff has also imposed an arbitrary limit on the number of inmates that can be requested at one time—three. After those three visits, the process would start all over again. Visitation with female clients housed in the older jail building is more difficult. Video visitation is available with female clients but due to the poor audio and visual quality of the video visitation equipment, it is virtually impossible to communicate with clients and make eye contact. Long hours in court coupled with few hours in jail leave very little time for attorneys to prepare for their cases.
10. Visiting incarcerated clients have become more complicated and difficult recently when clients with mental health needs were moved to Hunt Correctional Facility which is over an hour away one-way, and nearly 200 clients were moved to East Carroll Parish and Franklin Parish jails which are located in the far northeast corner of Louisiana requiring a round trip of 8+ hour drive. OPD attorneys do not have the time to visit their clients housed in East Carroll and Franklin. Cases are delayed and set back because clients detained out of parish are not produced for court hearings and attorneys are not able to communicate and build a trusting, working relationship with their clients.
11. In Fiscal Year 2015 (June 20, 2014 to July 1, 2015), OPD handled nearly 22,000 cases, including 9,782 misdemeanors, 7,805 felonies, 217 felony cases carrying a sentence of life without the possibility of parole (LWOP), 8 capital cases, 2,983 revocations, and 1,122 juvenile/family court cases.



12. The Louisiana Public Defender Board (“LPDB”) promulgated caseload standards in the Louisiana Standards on Indigent Defense (12-1.1). The term *case* means a single charge or set of charges concerning a defendant in one court in one proceeding. An appeal or other action for post-judgment review by a higher court is a separate case (Standard 12-2.2).

|                                 |         |
|---------------------------------|---------|
| Capital Cases                   | 3-5     |
| Charges Carrying Automatic Life | 15-25   |
| Non-Capital Felonies            | 150-200 |
| Misdemeanors                    | 400-450 |
| Traffic                         | 400-450 |
| Juvenile                        | 200-250 |
| Mental Health                   | 200-250 |
| Other Trial Cases               | 200-250 |
| Capital Appeals                 | 3-5     |
| Non-Capital Felony Appeals      | 40-50   |

13. Each OPD attorney is evaluated and placed into a lawyer practice level. OPD has 5 lawyer practice levels, ranging from Level 1 (most junior/least experienced) to Level 5 (most senior/most experienced): Level 1, misdemeanors; Level 2, low-level felonies (i.e. drug possession, theft); Level 3, mid-level felonies involving guns, drug distribution and/or complainants (i.e. drug distribution, felon in possession of firearm, burglary, aggravated battery and assault); Level 4, serious felonies with effective life sentences (i.e. armed robbery, forcible rape); and Level 5, felonies carrying a life in prison without the possibility of parole sentences (i.e. murder, aggravated rape).
14. Louisiana has a habitual offender provision with very stiff mandatory sentencing provision. Orleans Parish district attorney makes regular use of the habitual offender statute when negotiating pleas and at sentencings following a trial. *See* La. R.S. 15:529.1. Use of the habitual offender statute is left to the discretion of the district attorney who can file a “multiple offender bill” against clients with prior convictions. For example, the sentencing provision for a person arrested for simple possession of cocaine who does not have a prior criminal record is 0-5 years. If this person has a one prior felony conviction and he is multiple billed by the state, his sentencing exposure for the simple possession charge is 30 months to 10 years in prison without the possibility of parole. If this person has two prior felony convictions, his sentencing exposure is 40 months to 10 years without the possibility of parole. If this person has three prior felony convictions, his mandatory sentencing exposure is 20 years to life without the possibility of parole. Colloquially, a person with one prior felony is referred to as a “double” offender. A person with two prior felonies is a “triple,” and a person with three prior felonies is a “quad.” Generally, “quads” will face between 20 or 30 years to life if convicted at trial.
15. In some cases, the habitual offender law requires an automatic life sentence for third offenses for crimes of violence, certain non-violent felonies such as burglary, and some drug offenses. Those clients are called “lifers.” For example, a person with prior convictions for possession with intent to distribute marijuana and possession of heroin who is currently charged with burglary would face a sentence of automatic life without parole if found guilty at trial and treated as a habitual offender by the prosecution.
16. If a person is sentenced as a habitual offender, that person is not eligible for parole or prison time reductions, and must serve every day of the sentence imposed. In Louisiana, this is called “flat time.” The current practice of the district attorney’s office is to use the habitual offender statute after trial to the fullest extent in almost all cases.



17. In general, the current district attorney's office is unlikely to negotiate reductions in sentences post-trial and will choose to use the multiple bill to the full extent possible. The prosecution also uses the multiple bill heavily in the plea bargaining process. The prosecutors will often offer plea deals that include habitual offender status billing so that clients will not get "good time" (60% reductions of their prison time) and instead will do their time flat. For example, it is not uncommon for prosecutors to offer a "quad" charged with simple possession of cocaine a plea offer of "double and 5," meaning the client can plead guilty to having had one prior felony conviction pursuant to the habitual offender statute and agree to serve 5 years flat in prison without the possibility of parole.
18. For case practice level purposes, OPD does not factor in a client's prior criminal history. Therefore, relatively inexperienced Level 2 attorneys could be assigned to a client facing 20 years to life on possession of cocaine because of their criminal history. A Level 3 attorney handling burglary and drug distribution cases are regularly assigned clients facing an automatic life sentence.
19. In some sections of court, prosecutors routinely offer "exploding deals" on the day of arraignment. Exploding deals are plea offers that are available for one day only. In Louisiana, the defense is not entitled to discovery until after case acceptance at arraignment. Thus, the prosecution might turn over a police report at the same time as offering a plea deal. Ideally, attorneys will be familiar with the case and will have conducted independent investigation into the case and into their client's criminal history so they can properly advise the client about the state's plea offer. More often, due to excessive caseloads, attorneys have not had the opportunity to meet with their clients or investigate the case, and therefore have to advise their clients about the state's offer "in the blind."
20. Currently, OPD has 53 total bar licenses. Five, including myself, are in the management leadership team; 5 are supervising attorneys, 34 are staff attorneys (1 juvenile, 1 CINC, 1 part-time), 3 are in the capital division, and the remaining 5 are in the Conflict Division. Three of the staff attorneys are attorney fellows focused on specific fellowship proposed areas of law and practice. These three attorney fellows carry half the caseload as a full-time staff attorney.
21. OPD has five dedicated supervisors: two supervising attorneys handling felony cases, one supervising attorney handling misdemeanors, one supervising newly hired attorneys who recently passed the bar in October carrying mixed caseloads of Levels 1 and 2, and one who is the Litigation Director.
22. Since the beginning of the last fiscal year (July 2014), OPD has lost a significant number of attorneys to attrition: 14 felony staff attorneys. In total, since July 2014, OPD has lost 29 staff members.
23. In October, 10 new attorneys who had been extended employment offers with the office before the hiring freeze went into effect (to stem caseload increases caused by the attrition referenced above) began accepting Level 2 cases. Five of those attorneys are wholly funded through outside, time-limited grants or fellowships. Five were hired directly by our office. All of the new attorneys are recent law school graduates. All but one of the new attorneys has not practiced law before; the one exception did a two-year supervised criminal defense fellowship at a law school after graduation and before beginning work at our office. Budget constraints and the availability of outside funding generally limit our office to hiring new law school graduates, who are more affordable than lateral hires who could handle more complex cases.
24. OPD must also engage in the supervisory writ practice regarding pretrial rulings. Supervisory writs ("writs") are interlocutory appeals available to either party on almost any pretrial issue. Unlike the District Attorney's office with a full-time



appellate staff of eight attorneys handling writs, OPD has four lawyers, including the Litigation Director, with slightly reduced caseloads who can at times assist other attorneys with writs. Often times, attorneys must handle writs themselves. This includes researching, writing, and physically preparing the writs to be filed at Louisiana Fourth Circuit Court of Appeals or the Louisiana Supreme Court. We have to file original writs when appropriate, and more frequently are required to respond to writs taken by the prosecution. It is not unusual that one of those courts will order a response from our office in a short time frame, which strains office resources.

25. OPD has eight full-time staff investigators, one investigative supervisor, one interpreter, three client advocates, one social worker, five administrative and court support assistants, and four business office administrators. Additionally, OPD has four year-long volunteers from Louisiana Delta Service Corp, a local AmeriCorps program serving the Delta regions of Louisiana, and two year-long volunteers from Avodah, the Jewish Service Corps. These six year-long service corps volunteers assist OPD's client advocates and social workers. OPD also has two social workers through the federally funded Justice Assistance Grant (JAG) program. These are one-year positions.

26. Below is the OPD attorney caseload chart as of November 15, 2015. This chart only reflects attorneys who have been at OPD from January 1, 2015 to present. Recently hired attorneys sworn into the Louisiana State Bar in October and who began to pick up cases thereafter are not included in this chart.

| Attorney                            | Practice Level | LPDB Caseload Limitations (Annual) | Cases Handled from 1/1/15 to Date<br><br>(M: Misdemeanors; F: Felonies; LWOP: Life w/o Possibility of Parole; R: Revocations) | Currently Open/Pending Caseload<br><br>(M: Misdemeanors; F: Felonies; LWOP: Life w/o Possibility of Parole; R: Revocations) | New Cases Received 1/1/15 to Date<br><br>(M: Misdemeanors; F: Felonies; LWOP: Life w/o Possibility of Parole; R: Revocations) |
|-------------------------------------|----------------|------------------------------------|---|---|---|
| Anderson, Lauren                    | 3              | 150-200                            | 671 M<br>158 F<br>182 R   | 78 M<br>121 F<br>21 R   | 431 M<br>155 F<br>171 R   |
| Barksdale, Russell                  | 5/Juvenile     | 15-25/200-250                      | 8 M<br>49 F<br>7 LWOP<br>18 R<br>2 Juvenile Misdemeanors<br>56 Juvenile Felonies<br>4 Juvenile Life                           | 5M<br>33 F<br>5 LWOP<br>7R<br>0 JM<br>47 JF<br>0 JL   | 8 M<br>19 F<br>2 LWOP<br>15 R<br>2 JM<br>56 JF<br>1 JL  |
| Brockway, James                     | 3/Muni         | 150-200/400-450                    | 374 M<br>228 F<br>95 R  | 148 M<br>110 F<br>17 R  | 344 M<br>184 F<br>89 R  |
| Carpenter, Zack (felony supervisor) | 5              | 15-25                              | 17 M<br>123 F<br>6 LWOP<br>26 R   | 7 M<br>79 F<br>5 LWOP<br>6 R  | 15 M<br>73 F<br>2 L<br>25 R   |
| Chernow, Alexis                     | 3/Muni         | 150-200                            | 239 M<br>189 F<br>53 R  | 125 M<br>52 F<br>9 R  | 232 M<br>139 F<br>43 R  |
| Chervinsky, Sarah                   | 4              | 150-200                            | 9 M<br>139 F<br>5 LWOP<br>20 R  | 2 M<br>89 F<br>4 LWOP<br>10 R   | 9 M<br>75 F<br>4 L<br>13 R  |
| Cousins, Adrienne                   | 3/Muni         | 150-200                            | 623 M<br>172 F  | 44 M<br>125 F   | 496 M<br>167 F  |

|  |        |                 |                                 |                               |                             |
|--|--------|-----------------|---------------------------------|-------------------------------|-----------------------------|
|  |        |                 | 158 R                           | 11 R                          | 150 R                       |
| Ellis, Carrie<br>(training director)                         | 5      | 15-25           | 2 M<br>18 F<br>12 LWOP<br>7 R   | 2 M<br>12 F<br>10 LWOP<br>2 R | 1 M<br>3 F<br>1 L           |
| Engelberg, Daniel<br>(deputy trial chief)                    | 5      | 15-25           | 5 M<br>12 F<br>8 LWOP<br>9 R    | 1 M<br>8 F<br>7 LWOP<br>2 R   | 4 M<br>5 F<br>7 R           |
| Frampton, Thomas   | 2/Muni | 150-200/400-450 | 319 M<br>182 F<br>124 R         | 52 M<br>149 F<br>36 R         | 284 M<br>139 F<br>120 R     |
| Gumina, Max  | Muni   | 400-450         | 1599 M<br>296 R                 | 640 M<br>20 R                 | 1345 M<br>286 R             |
| Hardin, Kenneth<br>(felony supervisor)                       | 5      | 15-25           | 6 M<br>26 F<br>9 LWOP<br>16 R   | 1 M<br>13 F<br>6 LWOP<br>2 R  | 6 M<br>8 F<br>5 L<br>10 R   |
| Holder, Mariah<br>(started in April 2015)                    | 3/4    | 150-200         | 6 M<br>198 F<br>27 R            | 3 M<br>147 F<br>14 R          | 6M<br>176 F<br>28 R         |
| Hortenstine, Barksdale<br>(felony supervisor until 10/31/15) | 5      | 15-25           | 9 M<br>16 F<br>16 LWOP<br>7 R   | 1 M<br>13 F<br>12 LWOP<br>0 R | 9 M<br>8 F<br>7 L<br>5 R    |
| Jeffrey, Lindsey   | 3/Muni | 150-200/400-450 | 111 M<br>185 F<br>27 R          | 86 M<br>68 F<br>17 R          | 105 M<br>136 F<br>26 R      |
| Lindner, Rachel  | Muni   | 400-450         | 653 M<br>98 R                   | 337 M<br>15 R                 | 636 M<br>97 R               |
| Lommers-Johnson, Hannah                                      | 3/Muni | 150-200/400-450 | 436 M<br>130 F<br>136 R         | 93 M<br>111 F<br>21 R         | 332 M<br>124 F<br>132 R     |
| Miller, Jared  | 3      | 150-200         | 21 M<br>276 F<br>34 R           | 9 M<br>98 F<br>14 R           | 230 F<br>19 M<br>30 R       |
| Moroz, Stanislav   | 3/Muni | 150-200/400-450 | 238 M<br>209 F<br>58 R          | 180 M<br>55 F<br>19 R         | 227 M<br>169 F<br>55 R      |
| Muse, Jack   | Muni   | 400-450         | 702 M<br>21 F<br>123 R          | 337 M<br>16 F<br>13 R         | 665 F<br>18 F<br>123 R      |
| Orjuela, Zack  | 4/5    | 150-200/15-25   | 11 M<br>225 F<br>59 R           | 7 M<br>125 F<br>16 R          | 9 M<br>123 F<br>46 F        |
| Orzechowski, Karen   | 3      | 150-200         | 20 M<br>155 F<br>9 R            | 4 M<br>100 F<br>6 R           | 19 M<br>146 F<br>9 R        |
| Peng, Tina   | 4      | 150-200         | 17 M<br>293 F<br>35 R           | 5 M<br>133 F<br>19 R          | 16 M<br>179 F<br>28 R       |
| Reingold, Colin<br>(litigation director)                     | 5      | 15-25           | 2 M<br>13 F<br>4 LWOP<br>12 R   | 2 M<br>8 F<br>2 LWOP<br>3 R   | 2 M<br>5 F<br>1 L<br>9R     |
| Roche, Leon  | 5      | 15-25           | 3 M<br>45 F<br>17 LWOP<br>17 R  | 0 M<br>37 F<br>12 LWOP<br>8 R | 1 M<br>33 F<br>4L<br>8 R    |
| Samuel, Lindsey<br>(misdemeanor supervisor)                  | 5      | 15-25           | 11 M<br>141 F<br>4 LWOP<br>36 R | 2 M<br>68 F<br>4 LWOP<br>19 R | 15 M<br>66 F<br>1 L<br>33 R |



|  |      |               |                                |                               |                            |
|--|------|---------------|--------------------------------|-------------------------------|----------------------------|
| Snowden, Will                                | 4    | 150-200       | 10 M<br>252 F<br>50 R          | 3 M<br>113 F<br>24 R          | 8 M<br>128 F<br>34 R       |
| Wayne, Seth (fellow; leaving in January)     | 4/5  | 150-200/15-25 | 1 M<br>87 F<br>7 LWOP<br>20 R  | 0 M<br>39 F<br>7 LWOP<br>5 R  | 1 M<br>40 F<br>3 L<br>11 R |
| Weeks, Nia (leaving at end of November 2015) | Muni | 400-450       | 918 M<br>200 R                 | 228 M<br>15 R                 | 763 M<br>195 R             |
| Weidenhaft, Donna (training supervisor)      | 5    | 15-25         | 3 M<br>22 F<br>15 LWOP<br>7 R  | 3 M<br>17 F<br>9 LWOP<br>5 R  | 4 M<br>8 F<br>2L<br>4 R    |
| Brian Woods                                  | 5    | 15-25         | 7 M<br>79 F<br>13 LWOP<br>25 R | 1 M<br>48 F<br>9 LWOP<br>10 R | 6 M<br>43 F<br>5 L<br>18 R |

27. Below is the OPD investigator caseload chart as of November 12, 2015.

| Investigator     | Currently Open/Pending Cases | Cases Closed from 1/1/2015 to 11/12/2015 |
|------------------|------------------------------|--|
| John Ackerman    | 78 (16 LWOPs)                | 77                                       |
| Ashley Holladay  | 71 (8 LWOPs)                 | 58                                       |
| Kiah Howard      | 82 (9 LWOPs)                 | 66                                       |
| Phil Jobe        | 67 (23 LWOPs)                | 65                                       |
| Sarah Jones      | 63                           | 73                                       |
| Josh Pichon      | 54 (7 LWOPs)                 | 65                                       |
| Chana Rabinovitz | 59                           | 87                                       |
| Ricky Zacharias  | 55 (16 LWOPs)                | 50                                       |

28. OPD's fiscal year 2016's projections for locally generated statutory revenue are short by more than \$300,000. Additionally, Louisiana Public Defender Board is reducing OPD's state-appropriated funds for FY2016 by approximately \$700,000. Up to 50% of OPD annual funding is reliant on traffic tickets and fees imposed on defendants.

29. OPD spent an average of \$578,500 per month in FY2015. Maintaining that pace for FY2016, OPD would spend approximately \$6,942,000 in FY2016. This projected expenditure exceeds OPD's FY2016 projected budget by more than \$959,000.

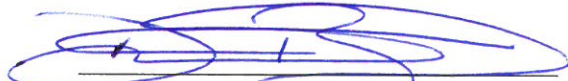
30. OPD implemented a Restriction of Services (ROS) protocol on July 1, 2015. As part of its ROS, OPD has implemented a hiring freeze as of July 1, 2015. This freeze will remain in place at least until the end of OPD's fiscal year (June 30, 2016). This hiring freeze includes replacing vacated positions. OPD has eliminated new capital conflict representation as of July 1, 2015. Existing cases will continue to receive funding, but additional cases will be referred to LPDB. OPD will stop contracting for new (non-capital) conflict cases once city funds designated for Gang Violence Reduction Strategy (GVRS) and Juvenile Court Cases are depleted. OPD has cut its operational expenses by \$158,000 which will result in shortages in funding for expert witnesses and training.

31. Because OPD has very limited funds reserved for expert services, we often deny attorneys' request for expert consultation and services. This fiscal year's expert witness budget is only \$30,000. Due to such limited funds, we are forced to triage our expert needs. An attorney recently sought funds for a psychiatrist to evaluate a client for a possible NGRI plea but that request was denied. Another attorney

requested services of an expert for a contested sentencing hearing and less than half of the requested amount was approved leaving the attorney with difficult choices. A third attorney requested the services of a digital forensics investigator and was not approved at the requested amount.

32. Since instituting the hiring freeze and announcing furloughs, OPD has lost 6 attorneys and two more will be leaving in the next two months. The workload of these attorneys had to be absorbed by the existing staff increasing everyone's caseload.
  
33. OPD resources do not match those of the district attorney's office. Despite the fact that OPD handles nearly 85% of cases in Criminal District Court, OPD is funded at a ratio of 6:1 compared to the district attorney's office. The district attorney received an appropriation of \$ 6.4 million from the City of New Orleans in 2015 whereas OPD received a little over a million (\$1.1 million). City directed other revenue from traffic camera tickets to OPD but such source of funding is unreliable. Such disparity in funding and resources can only result in a public defender office that is overworked and unable to adequately carry out its constitutional duties.

That these statements are true and correct to the best of my knowledge, information and belief.

  
**DERWYN BUNTON**

**SWORN TO AND SUBSCRIBED TO BEFORE ME, NOTARY, THIS 20 DAY OF NOVEMBER 2015.**

  
\_\_\_\_\_  
**NOTARY PUBLIC**