

VIRGINIA:

IN THE CIRCUIT COURT FOR HENRICO COUNTY

COMMONWEALTH OF VIRGINIA

v.

JOSEPH DEE MORRISSEY,

Defendant

DOB: 09/23/1957

SSN: ████████-2435

(not 4 digits)

WJN

ALFORD
PLEA AGREEMENT

1. My name is Joseph Dee Morrissey and my age is 57 years.
2. I am represented by retained counsel whose names are: Ward L. Armstrong, Esq., Anthony F. Troy, Esq., and James T. Maloney, Esq. and I am satisfied with their services as defense attorneys.
3. I have received a copy of the indictments before being called upon to plead, and I have read and discussed it with my attorney, and I fully understand the charges against me in this case. I am the person named in the indictment. I have told my attorney all the facts and circumstances, as known to me, concerning the case against me. My attorney has discussed with me the nature of the charge, has explained to me the elements of the offense, and has advised me as to any possible defense I might have in this case. I have had ample time to discuss the case and all possible defenses with my attorney. The Commonwealth has disclosed all pertinent Discovery / Brady material, which I have reviewed with my attorneys.
4. STIPULATION OF FACTS: I agree that the following is a summary of the Commonwealth's evidence against me in the foregoing case, and I agree that the Court will accept this summary in lieu of presentation of any evidence by the

Commonwealth. I further stipulate that the Commonwealth's evidence constitutes a *prima facie* case in the instance of the crime to which I am entering this plea. However, given that this is an Alford plea, I also reserve the right to present the defense version of the evidence below:

SUMMARY:

Jessica Kennamer, a medical assistant employed at the Richmond Foot & Ankle Center, would testify that in 2013 a girl, "MP", age 17, was also employed there as a part-time receptionist. In April or May 2013 Kennamer observed the Defendant, as a customer at the center, closely observing MP's figure as she walked by him. Kennamer then remarked to the Defendant, "Whoa boy – she's under-age" to which remark the Defendant merely smiled back.

Brandi Price, who was also employed at the Foot & Ankle Center with MP, would testify that she also observed that whenever the Defendant came to the center he would ask to speak with MP. She believes this happened about 10 times. Once she over-heard the Defendant and MP discussing how MP "was about to graduate" (from high school in August 2013), so she assumed that the Defendant must then have been aware that MP was a juvenile. However, Price then counseled MP about the dangers of flirting with older men.

Deidra Pearson, age 27, is the older sister of MP, would testify that in the summer of 2013 MP and their mother, Deidra Warren, were all living in Pearson's home due to a fire having damaged Warren's home. Pearson was at that point helping to support MP financially as their mother recovered from the fire losses. Therefore, when MP, age 17, went to work in August 2013 as a receptionist for the Defendant's law firm and when she noticed that MP was receiving after hours text messages from the Defendant, age 55, and staying out late with him, she became concerned for her naïve young sister. She warned her sister to be careful around such an older man. She discussed her concerns with **Brittaney McKinney**, MP's older friend and she then learned that McKinney had observed sexual texts between the Defendant and MP on MP's cell phone.

Pearson then secured from her mother the cell phone account passwords for MP's Apple iPhone and she advised McKinney to go out and purchase an Apple iPod, which they could use to monitor MP's sexual texts with the Defendant. Late on 8/21/14 McKinney then

copied and forwarded to Pearson's cell phone the first such sexual texts which had been monitored and photographed (via "screen shots") by McKinney using MP's Apple cell phone account.

On 8/23/13 Pearson observed that MP had told their mother that she was "planning to spend the night out with girlfriends", but Pearson judged that MP actually intended to spend the night with the Defendant, so she watched her. She observed MP leave the house wearing a dress and white blazer and carrying an over-night bag.

Pearson and McKinney then together followed MP to the Boathouse Restaurant, where they observed MP have dinner with the Defendant until about 9:30 PM. Pearson then observed the Defendant kiss MP as they left the restaurant, at which point MP followed the Defendant to his home at 588 Virginia Center Parkway in Henrico County. Since this is a gated community, Pearson could not follow MP and the Defendant into it, so she telephoned her father to come and assist. Once her father was there, he called the Henrico police to retrieve his daughter from the Defendant's home, which **Henrico police officers Rhodes and Lt. Sperry** did around mid-night on 8/23/13.

Pearson observed that when MP left the Defendant's house she was no longer wearing her dress, but had changed clothes and that MP's hair was wet as though she had showered. Both Pearson and her father then complained to the police about the Defendant's conduct with MP and Pearson gave the police copies of the 8/21/13 sexual text messages exchanged between the Defendant and MP.

(Pearson would further testify that after the police opened a criminal investigation, she and her sister Christina were present on 10/29/13 at Starbucks when the Henrico detectives spoke to their mother about the allegations and evidence against the Defendant. Thereafter, the two sisters confronted MP about having sexual intercourse with the Defendant, at which point MP conceded that the Defendant "had put (his penis) into her a little bit". Pearson recorded this conversation).

Henrico Police Sgt. AM Robertson was assigned to follow up on Pearson's criminal complaint and he interviewed MP on 8/24/13 in the presence of her mother. He determined that MP was age 17 (DOB 3/20/96) and that the Defendant was age 55. He further determined that MP's Apple iPhone # was (804) 475-8935 and that the Defendant's Apple iPhone cell # was (804) 400-5965. MP told him that she started to work for the Defendant as a receptionist in his Henrico County law office on 8/5/13 and that she hoped to become a

lawyer one day. She admitted that the Defendant had taken her out to dinner twice, including 8/23/13, but she denied having a sexual relationship with him.

However, MP declined to speak about whether she had sent the Defendant any sexually explicit photos of herself, so Sgt. Robertson secured a search warrant for MP's cell phone, which he seized in 8/25/13. Sgt. Robertson then secured a search warrant to search the contents of MP's phone.

(Sgt. Robertson was then promoted to lead another police unit and Detectives Kelley and Wright were assigned to this investigation).

Major Michael Ames of the Richmond City Sheriff's Department would testify that on or about 8/9/13 the Defendant applied to that jail for permission for his law office receptionist, MP, to be able to enter the jail as needed for law office business. This 8/9/13 application submitted and signed by the Defendant contained MP's correct date of birth – 3/20/96.

Ann Lawson, the Defendant's secretary, would testify that she interviewed MP in July 2013 for a law office receptionist position. MP was hired in that position effective 8/5/13 and worked for the law firm until the end of that month. When shown the Defendant's 8/9/13 Richmond Jail application for MP, Lawson would admit that she typed the cover letter and that she recognized the signature on the application as being the Defendant's.

When shown a steno pad seized from the law office by the police per a search warrant in December, 2013, Lawson would admit that her undated steno notes reveal her interview with MP in which Lawson recorded MP's age as being 17.

Carter Nichols, 24, would testify that he served as the Defendant's 2013 legislative aide until 8/19/13 when he left to enter law school. He would testify that he met MP in July 2013 when "she was about to be hired" per the Defendant as his receptionist. Although MP then told him that she planned to start VCU, it was readily apparent to him that she was under age 18. On 8/24/13 the Defendant asked Nichols to help him replace his damaged cell phone. When they met to do so, the Defendant told him that he "didn't know MP was under 18 until the week leading up to 8/23" (when the police found her at his home). The Defendant further told him that Ann Lawson had warned him (around 8/9/13) that MP was too young to be admitted to the Richmond jail for law office business.

Nichols also was present in the Defendant's car on 8/24/13 as the Defendant was loudly overheard on his cell phone telling both his attorney and Nichols that "he had received sexually explicit photos from MP, which he had then forwarded to his friend, Abe Massad."

Gloria Beil, secretary for the Charles City/County Farm Bureau, would testify that on the night of 8/20/13 the Defendant attended a dinner there around 8 PM. He was accompanied by MP, his receptionist. Beil then photographed both the Defendant & MP sitting together at this dinner that night.

"MP" (now age 18) would testify (likely as a hostile/adverse witness), that when she met the Defendant in 2013 at the Foot and Ankle Center she told him she wanted to become a lawyer and he encouraged her to apply to his law firm. She would contend that she misled the Defendant about her age "letting him believe she was already in college." (Indeed her photocopied resume and application, which were seized by the police from the law firm in December 2013, indicate that MP falsely stated her age as being 22 when she applied. However, the originals of these documents were nowhere to be found at the law firm).

MP would concede that the Defendant's 8/9/13 signed application to the Richmond City Sheriff for jail access contained her true date of birth – 3/20/96.

MP would concede that shortly after she started work at the Defendant's law firm, he took her out to dinner twice – on 8/16/13 and again on 8/23/13 - when she was later found alone with the Defendant at his home by the police.

MP would concede that she attended the Charles City/County Farm Bureau dinner with the Defendant after work on 8/20/13. She would further concede that on 8/20/13 her car's brakes were repaired (paid for by the Defendant) at a garage near his law office (indicating that after the dinner she and the Defendant returned to the law office to pick up her car. Indeed MP told Detective Kelly on 10/20/13 that she and the Defendant returned to his Henrico County law office the night of 8/20/13, where she initiated kissing and mutual sexual fondling, but that she stopped it short of sexual intercourse).

MP would concede that she routinely backed up all her Apple cellular iPhone texts and other cell records onto her Apple iCloud records storage account.

When shown a nude photo of her-self sent from her cell phone to the Defendant's cell phone on 8/21/13, MP would concede that the photo was of her at age 17, but state that she did not recall sending it.

MP would also concede that she and the Defendant have never been married to each other.

(MP would state upon cross-examination that she and the Defendant never engaged in sexual intercourse when she was underage, as she has consistently claimed to the police during this investigation).

Kaelah McClaine, 18, a friend of MP's since 9th grade, would testify that she knew that MP had gone to work for the Defendant in August. She would further testify that on 8/20/13 at 11:24 PM she received the following cell phone text transmission from MP's phone to McClaine's cell phone:

"OMG so much I have to tell you but the most important thing is !!! I just fucked my boss tonight in our office on the desk and on the floor."

McClaine texted back her surprise and warnings to MP not to get pregnant to which MP texted back indications that she indeed feared pregnancy, etc.

Abe Massad, the Defendant's friend for 25 years, would (reluctantly) testify that at 10:30 PM on 8/20/13 he received the following text message from the Defendant's cell phone to Massad's cell phone:

"Hey, buddy I just fucked her on my conference table and again on the floor for good measure!"

Massad would further concede that after receiving on 8/21/13 the forwarded nude photo of MP (which she had sent to the Defendant's cell phone on 8/21/13), that he texted back the following reply to the Defendant's phone:

"U ARE SO LUCKY... CONGREATULATIONS BROTHER"

Lesley Ahlberg, custodian of Apple iCloud records, would testify that in response to search warrants supplied by Henrico Police detectives, Apple transmitted all of MP's Apple cell phone data, MP's Apple iCloud storage data, as well as *the Defendant's* iPhone iCloud data to the Henrico police. She would confirm that all these Apple digital storage records are kept confidentially for Apple customers in the normal course of Apple's business and that Apple customers routinely rely upon the authenticity of such records. She would further confirm that the records supplied were securely maintained and not altered in any way by Apple.

Detective E.A. Wright of the Henrico Police Department, an electronic forensic expert assigned to the FBI Child Exploitation Task Force, would testify that upon receiving the Apple cell phone records as well as the Defendant's subpoenaed cell phone records from his Verizon SMS text message account, she discovered that the above quoted text messages were indeed transmitted to and from the cell phones belonging to the Defendant and MP.

Det. Wright would further testify that found in MP's Apple iCloud stored text messages was the following 8/21/13 text exchange between the Defendant and MP:

- i. 7:18 AM – MP to Defendant: "I woke up this morning and got in the shower and I was thinking about last night, which was wonderful. Now I'm laying here completely naked water dripping off my body and my hair dripping just fantasizing about what you would do to me right now."
- ii. ... 7:22 AM Defendant to MP: "I wish I was there NOW! Your right, last night was great. Btw, how much time do you want me to spend caressing n luck inking you before I put my cock inside you?"
- iii. ... 7:29 AM Defendant to MP: "a pic you lying there fantasizing about me fucking you... send me a pic and then I'm gonna call you."
- iv. 7:37 from MP to Defendant: "You got me with a fresh face (no makeup) and a fresh body" (Naked photo of MP sent to the Defendant's cell phone – see Exhibit 1).
- v. 7:37 from Defendant to MP: "GORGEOUS... simply GORGEOUS!!! could eat you... but then again I did already!"

Det. Wright would further testify that many of the incriminating sexual text messages between the Defendant and MP as well as other texts from them to third parties were confirmed and corroborated from multiple sources – MP's seized iPhone; the Defendant's Verizon SMS text message records; MP's Apple iCloud digital storage records and photos of texts given to the police by MP's sister, Ms. Pearson. (See attached text message chart as **Exhibit # 1**).

Furthermore, after reviewing all these seized cell phone records herself and also with former Apple Information Technology security chief, **Derrick Donalley** of Black Bag Technology, a nationally recognized electronics expert who also would testify if needed,

Detective Wright would testify that both experts concluded that there is no evidence of any "hacking" (i.e. hijacking or altering texts / photos) pertaining to either the Defendant's or MP's cell phone text records, nor upon the iPod Touch devices belonging to MP or Brittany McKinney, as claimed by the defense.

Special Agent Wendall Costenza of the FBI Cell Tower Task Force, would testify as an expert that the Sprint and Verizon cell phone tower evidence in this case indicates that:

- That on 8/20/13 that the Defendant's cell phone was transmitting from the tower near his law office at 10:13 PM; and
- That on 8/20/13 MP's cell phone was transmitting from the cell tower near the Defendant's law office at 10:20 PM.

(Agent Costanza would also testify in rebuttal, if needed, that the Defendant's cell tower engineer "expert" mistakenly interpreted the cell tower data by confusing MP's Sprint cell phone tower sending data with her Sprint cell phone tower receiving data in rendering his opinion as set forth below).

(And should the Defendant attempt to introduce his electronic expert from Sensai Enterprises, then **Detective CA Kelley** would testify in rebuttal that found among the defense reciprocal Discovery evidence disclosed to the Commonwealth were:

- On the Defendant's iPhone – 15 other nude and semi-nude photos of 17 year old MP – including the 8/21/13 nude photo of MP that the Defendant asked her to text to him around 7:30 AM that morning. Det. Wright would further testify that while the texts accompanying the above photos had been attempted to be deleted from this phone, that attempt was unsuccessful in deleting the accompanying photos, which were stored in a *separate Apple file*; and
- On MP's Apple iPod – an audio recording made on 10/29/13 of the Defendant and MP eavesdropping on MP's mother's interview with the police. During this recorded cellular phone eavesdropping, the Defendant is heard to state the following:

- Regarding Ms. Warren speaking to the police – “I told her NOT to answer any questions – just to listen to what they have to say”;
- Morrissey is then recorded as he instructs MP to “send her mother a text telling her to just get up and leave” the police interview; and
- Morrissey is also recorded asking MP “if they (the police) have the pictures?” She replies that she hopes not;
- Morrissey is also recorded as instructing / suggesting to MP that she tell the police that the “graphic texts” (about her 8/20/13 sexual encounter with him) actually pertained “to some other boy”.

(And if needed, **Brittaney McKinney**, age 24, would testify in rebuttal that she did not purchase her Apple iPod at Best Buy until 4:30 PM on 8/21/13 for which purchase the police have the receipt. Thus, the first sexual texts between the Defendant and MP that she observed and forwarded to Pearson did not occur until after 4:30 on 8/21/13 – well after much of this crime was completed. She would further deny that she ever admitted to MP or anyone that she “hacked” MP’s cell phone, but that she only confided to her former friend MP in September 2013 that she and Pearson did on 8/21/13 – 8/23/13 use McKinney’s iPod to monitor and copy MP’s Apple text messages, which she then forwarded to Pearson and which Pearson later gave to the police.

Furthermore, the Commonwealth would present in rebuttal, as needed, several text messages back and forth between MP and McKinney which document that MP had possession of MP’s Apple iPod Touch electronic device during the period of these crimes – not McKinney as the defense claims below).

DEFENDANT’S POSITION

Joe Morrissey maintains he is absolutely not guilty of the charges as set forth in the indictments rendered against him and as more particularly described in the Bill of Particulars filed by the Commonwealth. Such includes the charge of contributing to the delinquency of a minor to which he is entering his “Alford plea.” Mr. Morrissey’s position is that he wishes to continue to provide for

and support his family and infant child and to continue to serve his constituents in the Virginia House of Delegates. Accordingly he has elected to enter an "Alford plea" so that he may return to those endeavors without undergoing the risks of trial.

Had this case gone to trial, however, the defense would have presented extensive evidence to show that he is not guilty of the Commonwealth's allegations as set forth in its indictments.

First, regarding the Commonwealth's allegations that Mr. Morrissey had sex with Myrna Pride on the evening of August 20, 2013, both Ms. Pride and Mr. Morrissey categorically deny that such sexual encounter ever occurred. The denial of sexual intercourse is consistent with Ms. Pride's previous testimony under oath before the grand jury and her multiple interviews with police. Ms. Pride has repeatedly maintained that the allegations are false and that she did not have sex with Mr. Morrissey. Additionally, multiple third party witnesses of high credibility would have testified that it would have been impossible for Mr. Morrissey to have had sex with Ms. Pride on the evening of August 20, 2013 as they were with Mr. Morrissey at the time the sexual encounter was alleged to have taken place.

Here is the chronology of events of the evening of August 20, 2013. First, the defense would have presented evidence that beginning at approximately 6 pm that evening Mr. Morrissey was at a Farm Bureau dinner in Charles City County with nearly two hundred people. The dinner and Mr. Morrissey's attendance would have extended from approximately 6:00 pm until approximately 8:15 pm. A photograph of Mr. Morrissey was taken at that dinner and such photo later appeared in a monthly newsletter of the Farm Bureau. The Commonwealth would not have challenged that Mr. Morrissey was at the Farm Bureau dinner. At approximately 8:15 pm Mr. Morrissey departed the Farm Bureau dinner and headed quickly drove back to Richmond. The trip took approximately 45 minutes.

The executive director of a HUD affiliated housing service organization and her assistant would have testified that at approximately 9:00-pm that evening, Mr. Morrissey met both of them at a restaurant at the White Oak Shopping Center, which is about a 45 minute drive from the location of the Farm Bureau dinner. The three discussed funding for renovations of a property in the City of Richmond owned by one of Mr. Morrissey's constituents. Mr. Morrissey had been contacted in his role as a member of the House of Delegates to assist the constituent with problems with the renovation.

The three remained at the restaurant until approximately 9:40 pm when they left and traveled to the location of the property on 3rd Avenue in the City of Richmond. There, Mr. Morrissey,

Ms. Smith and her assistant met with the home owner and inspected the property. The meeting ended when Mr. Morrissey left at approximately 10 pm.

From there Mr. Morrissey immediately traveled to a convenience store off Interstate 295 where he met with a minister and high-ranking member of the Cuccinelli for Governor Campaign to provide a donation of school backpacks for underprivileged school children. (Mr. Morrissey had made this donation for several years.) The pastor had driven from Hampton Roads to collect the backpacks. The two were photographed together and it is obvious in the photo that Mr. Morrissey was wearing the same clothing that he wore to the Farm Bureau dinner earlier in the evening where he was also photographed.

The minister is emphatic that the date and time of the meeting are correct. He specifically remembers pulling into the gas station parking lot at 10:15 pm on the night of August 20, 2013 and that Mr. Morrissey arrived exactly one minute later. He would also have testified that Mr. Morrissey left his presence at approximately 10:45 pm. Accordingly Mr. Morrissey was with the minister during the exact time period that the Commonwealth alleges that Mr. Morrissey had sex with Ms. Pride.

A cellular telephone tower engineer would have been called by the defense as an expert witness. This expert would have testified regarding cell tower records obtained from Sprint and Verizon, the two cellular telephone providers of Ms. Pride and Mr. Morrissey, respectively. The engineer would have said that the cell tower locations of phone calls made by Mr. Morrissey and Ms. Pride on the night of August 20, 2013 are exactly consistent with the testimony of the third-party witness testimony set forth above as to Mr. Morrissey's whereabouts on that evening.

Simply put, the cell tower evidence would have corroborated the locations of Mr. Morrissey and Ms. Pride on the night of August 20, 2013. The engineer would have opined that the two could not have been together having sexual intercourse on the night of August 20, 2013 as the two could not have been together after the Farm Bureau dinner.

Text messages obtained by the Commonwealth also corroborate that Ms. Pride was not with Mr. Morrissey when they were alleged to have had sex on August 20, 2013. For example at 10:12 pm on August 20, 2013, the following text message was sent from Ms. Pride to her friend Kayla McClaine, "I'm on my way home, I got to fighting with Britney physically! I will tell you all about it! Christina got involved." Such text was sent when the Commonwealth alleges Mr. Morrissey was having sex with Ms. Pride.

The defense would have presented evidence that a key prosecution witness and friend of Ms. Pride, one Brittney McKinney, was the author of text messages and text photographs

transmitted to "set up" Mr. Morrissey by making it appear 1) he was having sex with Ms. Pride and 2) Mr. Morrissey was soliciting and transmitting nude photographs of Ms. Pride. The defense contends Ms. McKinney was intent on dissolving the employer/employee relationship between Ms. Pride and Mr. Morrissey and ruining Mr. Morrissey's legal and political career.

The defense would show that despite her denials under oath before the special grand jury, Ms. McKinney was a former lesbian lover of Ms. Pride. Ms. McKinney became upset when Ms. Pride obtained employment with Mr. Morrissey. Eventually such upset turned into rage when she mistakenly believed that Mr. Morrissey and Ms. Pride were becoming romantically involved.

On August 10, 2013 Ms. Pride and Ms. McKinney spent the night together at Ms. McKinney's residence. Ms. McKinney later admitted that on this night she "hacked" into the cellular telephone of Mr. Morrissey to view his text messages. Ms. Pride had possession of the phone because she was instructed by Mr. Morrissey's paralegal to take the phone home with her overnight and transfer photos of Mr. Morrissey's infant daughter from the phone to a computer. Ms. Pride would testify that she watched as Ms. McKinney hacked into Mr. Morrissey's phone and obtained his iCloud ID and password information.

In addition to having her cellular telephone with her that night, Ms. Pride also possessed a device known as an "iTouch." An iTouch device is an Apple product that is capable of sending and receiving text messages and photographs over the internet but it cannot make voice calls. After obtaining Mr. Morrissey's account ID and password Ms. McKinney was then able to enter that information into Ms. Pride's iTouch. After approximately fifteen minutes of tinkering with the iTouch Ms. McKinney retrieved Mr. Morrissey's private text messages from his account and showed them to Ms. Pride.

After Ms. Pride left the following morning Ms. McKinney kept Ms. Pride's iTouch device with Mr. Morrissey's cellular telephone account information still on the device.

It is also important to note that Ms. Pride would have testified at trial that on the night of August 10, 2013, she told Ms. McKinney that she had a "crush" on Mr. Morrissey.

The defense would next introduce evidence that over the next several days and weeks Ms. McKinney became obsessed with the idea that Mr. Morrissey and Ms. Pride were having a romantic relationship. When she learned that Ms. Pride was attending a law firm staff dinner with Mr. Morrissey on August 16, 2013 Ms. McKinney incessantly called and texted Ms. Pride. Ms. Pride refused to answer Ms. McKinney's calls or texts. Over the next several days Ms. McKinney called or texted Ms. Pride more than 80 times.

The defense would show that Ms. McKinney conversed with Ms. Pride's sister, Diedre Pearson, and convinced her that Ms. Pride and Mr. Morrissey were having an affair. Ms. McKinney and Ms. Pearson then obtained Ms. Pride iPhone account password from Ms. Pride's mother. Ms. McKinney now had the ability to access Ms. Pride's account. She now had the ability to send and receive text messages and photographs on *both* Mr. Morrissey's account and Ms. Pride's account. Still, Ms. McKinney would need another device besides the Ms. Pride iTouch (still in her possession) in order to have a second device to create and send fictitious texts and photographs between Mr. Morrissey's phone and Ms. Pride's phone.

The defense would have presented evidence that Ms. McKinney then purchased another iTouch device from Best Buy. An expert witness would have testified that Ms. McKinney now had the ability not only to monitor text messages on Mr. Morrissey's and Ms. Pride's telephones but to also send texts and photographs. He would have testified that such could be accomplished using Ms. Pride's iTouch (still in Ms. McKinney's possession) and the second iTouch purchased from Best Buy. Ms. McKinney would have also had the ability to utilize the phones and devices of third parties to do the same thing.

To show motive to retaliate against Mr. Morrissey the defense would produce evidence that in the days before August 20, 2013, Ms. Pride repeatedly advised Ms. McKinney that their romantic relationship was over and that Ms. Pride wanted no further involvement with her. The two got into a physical altercation at a WaWa convenience store on August 18, 2013. As a result they exchanged multiple messages threatening revenge and physical violence. (Ms. Pride ultimately requested and was granted a Protective Order from the Chesterfield County Juvenile and Domestic Relations District Court which ordered Ms. McKinney to stay away from Ms. Pride for two years.)

The defense contends the breakup of Ms. McKinney and Ms. Pride sent Ms. McKinney into a rage and convinced her to ruin Mr. Morrissey by making it appear he was in a sexual relationship with Ms. Pride.

The defense alleges that over the next several days, including the evening of August 20, 2013 and continuing through the morning of August 21, 2013 and beyond, Ms. McKinney could and did author and send the salacious text messages and nude photographs contained in the Commonwealth's evidence. Both Mr. Morrissey and Ms. Pride would have testified and denied sending the text messages and photographs to one another or third parties.

Ms. McKinney admitted to Ms. Pride, to two friends, to Ms. Pride's mother and to a private investigator that she hacked into and sent texts fabricating conversations between Ms. Pride and Mr.

Morrissey. After initially lying to police on multiple occasions, Ms. McKinney signed an affidavit and testified twice under oath that she hacked into Ms. Pride and Mr. Morrissey's telephone accounts. Ms. McKinney was granted immunity for her illegal acts of hacking by the Commonwealth as well as for other illegal activity. The defense would have played two recordings, one audio and one video, showing Ms. McKinney tearfully confessing and admitting hacking into the account and sending messages.

The defense would have called two forensic cellular telephone experts who would have opined that Ms. McKinney hacked into Ms. Pride and Mr. Morrissey's accounts.

The defense evidence would have shown that when Mr. Morrissey became aware that a nude photo of Ms. Pride was sent to him on his telephone that he reprimanded Ms. Pride for doing so. Ms. Pride then advised Mr. Morrissey that Ms. McKinney and not herself, had sent the photo.

Moreover, the Commonwealth's own text evidence would have supported the claim that Ms. McKinney was continuing to harass Ms. Pride at work. On August 21, 2013 at 2:48 pm Ms. Pride texted from her phone "Can you please text her [Ms. McKinney] tell her to leave me alone and everything else!"

Defense evidence would have shown that Ms. Pride and Ms. McKinney took a series of explicit photographs of Ms. Pride in various stages of undress. Such occurred when they were together at a hotel at Virginia Beach in the weeks before the alleged incident on August 20, 2013. Ms. McKinney therefore had knowledge of and access to all of the photos which would have been admitted into evidence by the Commonwealth.

Further Mr. Abe Massad, the individual to whom Mr. Morrissey is alleged to have sent a nude photograph of Ms. Pride, would have denied receiving such a photograph of Ms. Pride.

Lastly the defense would have presented substantial evidence that Mr. Morrissey had a reasonable belief that Ms. Pride was over the age of 18 at the time of the alleged offense. Such evidence would have included the following:

1. A nurse from the Foot and Ankle Center where Ms. Pride and Mr. Morrissey met would have testified that Ms. Pride told Mr. Morrissey in her presence that Ms. Pride was a current VCU college student and considering enrolling in law school.
2. Ms. Pride's completed her job application with a birth date revealing that she was a 22 years of age and a college student at the time of the alleged incident.
3. Ms. Pride submitted a resume with her job application that also contained a birth date showing she was 22 years of age.

4. Two attorneys and three staff members from Mr. Morrissey's law office would have testified that at all times Ms. Pride held herself out to be 22 years old.

5. The law office administrator would have testified that a jail visitor application form given to Ms. Pride to complete was "pre-signed" by Mr. Morrissey in blank. The form was then given to Ms. Pride so she could enter her biographical information. (Jail officials would have testified that the minimum age to enter the jail was 18 so a request to enter by someone under the age of 18 would have been denied.)

Even Commonwealth witness Carter Nichols would have testified that Mr. Morrissey did not learn of Ms. Pride's age until after the date that Mr. Morrissey is alleged to have committed the crimes with which he is charged.

All of the above evidence would have shown that Mr. Morrissey believed Ms. Pride to be over 18 years of age.

If this case had gone to trial the Commonwealth would have presented evidence of an incident occurring on August 23, 2013 at the home of Mr. Morrissey. In response to such evidence the defendant would have offered the following evidence.

On August 22, 2013, Ms. Pride went to a local bank branch to check on the status of funds deposited in an account by her father, Coleman Pride, for her education. Ms. Pride needed the funds to pay her tuition for classes at VCU beginning in the fall of 2013. Ms. Pride was advised by a bank employee that Ms. Pride's father had removed virtually all of the money in the account and there were no funds available to pay her tuition. Ms. Pride became upset and burst into tears.

The next day, on August 23, 2013, Ms. Pride confronted her father about the missing money and an argument ensued. Ms. Pride advised her father that she was going to take up the matter with her boss, Mr. Morrissey, to see if legal action could be taken against him. She then departed.

The defense would present evidence that Mr. Coleman then asked Ms. Pride's sister, Diedre, and Ms. McKinney to follow Ms. Pride to see if she went to meet with Mr. Morrissey. The two followed Ms. Pride to the Boathouse Restaurant in the Rockett's Landing section east of the City of Richmond. After Mr. Morrissey arrived to meet with Ms. Pride, Ms. Pearson asked a parking lot attendant to take her phone into the restaurant and take a picture of the two having dinner.

Ms. Pearson and Ms. McKinney then followed Ms. Pride and Mr. Morrissey to Mr. Morrissey's home north of the City of Richmond. After Ms. Pride and Mr. Morrissey went inside the residence to talk, Ms. Pearson and Ms. McKinney called Mr. Coleman who then drove to meet the two women at a Buffalo Wild Wings restaurant which is near to Mr. Morrissey's house. The three

then called the police and a local television station multiple times to ask both to come to investigate what was going on inside the Morrissey home between Ms. Pride and Mr. Morrissey. Ms. McKinney stated that Ms. Pearson had made contact with a reporter of the same news station earlier in the day which demonstrates pre-planning on the part of both women.

A short while later police arrived and rang the doorbell. Mr. Morrissey came to the door, fully dressed and wearing laced-up sandals. The police asked to see Ms. Pride and Mr. Morrissey invited the officers into his home. Ms. Pride came to the door and was advised that her father was at the end of the driveway and demanded that Ms. Pride come home with him. Ms. Pride advised the officers that her father did not have custody of her and that she would not go with him. She left a short time later and returned to the residence of her mother where she lived.

The defense evidence would also reveal that after police arrived and advised Mr. Morrissey that they need to speak to Ms. Pride that Ms. Pride then and there advised Mr. Morrissey that she was not yet 18. This was the first time that Mr. Morrissey knew that Ms. Pride was 17 and not 22 as previously revealed to him by Ms. Pride and other sources.

The defense would present evidence that in the investigation that followed, police repeatedly interviewed Ms. Pride and her family. When Ms. Pride failed to acknowledge that she had sexual intercourse with Mr. Morrissey she was pressured to change her story. Police also suggested to Ms. Pride and her family that Mr. Morrissey could be sued for two million dollars if she would accuse him of having sex with her. Such notwithstanding Ms. Pride continued to deny having sex with Mr. Morrissey.

Finally if the Commonwealth sought to introduce a secret recording made by Ms. Pride's sister, Diedre Pearson, in December, 2013, wherein Ms. Pride stated that Mr. Morrissey put his penis in her, the defense would counter with the following testimony. Ms. Pride's treating psychiatrist would testify that at the time of the recording Ms. Pride was showing signs of anxiety, depression and suicidal ideation due to the pressure of repeated questioning about her relationship with Mr. Morrissey. The psychiatrist would have opined that Ms. Pride would have said anything to get people, including her sister, to leave her alone.

5. My attorney has advised me that the offense charges as follows:

Indecent Liberties - Supervisory in violation of §18.2-370.1.

Punishment: 1-5 years; or confinement in jail up to 12 months and a fine of up to \$2500, either or both.

Possession of Child Pornography in violation of §18.2-374.1:1.
Punishment: 1-5 years; or confinement in jail up to 12 months and a fine of up to \$2500, either or both.

Distribution of Child Pornography in violation of §18.2-374.1:1(C).
Punishment: 5 – 20 years in prison.

Contributing to Delinquency of a Minor in violation of §18.2-371 (i).
Punishment: Up to 12 months in jail and a fine of up to \$2500, either or both.

Electronic Solicitation of a Minor- 15 yrs. of age but less than 18 yrs. in violation of §18.2-374.3(D).
Punishment: 1-10 years in prison; or up to 12 months in jail and a fine of up to \$2500, either or both.

6. I understand that I may, if I so choose, plead "not guilty" to any charge against me, and that if I do plead "not guilty" the Constitution guarantees me (a) the right to a speedy and public trial by jury; (b) the process of the Court to compel the production of any evidence and attendance of witnesses in my behalf; (c) the right to have the assistance of a lawyer at all stages of the proceedings; (d) the right against self-incrimination; and (e) the right to be confronted by my accuser.

7. I concede that by entering an "Alford plea" to the Contributing indictment, I am doing so to avoid the potential that the jury would convict and sentence me on this evidence upon one or more of the felony indictments, and I understand that my Alford plea is a form of a guilty plea pursuant to North Carolina v. Alford, 400 U.S. 25 (1970). I further understand that by entering this plea I will, also, face these additional consequences:

- I waive my right to an appeal; and,
- Although I am not conceding factual guilt, I am admitting the Commonwealth has sufficient evidence to convict me on this charge (and potentially on the other indictments) and that it is in my best interest to enter this plea; and,

- The only remaining issue to be decided by the Court is punishment; and,
- I am waiving my right to a pre-sentence report; and,
- If I am not a U.S. citizen this plea / conviction could have an adverse effect upon my immigration status in the United States; and,
- I understand that any defense motion for a deferred adjudication in this matter pursuant to Starrs v. Commonwealth, 287 Va. 1 (2014) shall be deemed to be a material breach of this agreement and shall entitle the Commonwealth to fully rescind this agreement as well as to bring any previously withheld, reduced, and/or dropped criminal charges in this matter. In the case of such a material breach, all admissions contained in this plea agreement shall be admissible in all future court proceedings;

8. Taking into account the following:

- the circumstantial nature of the Commonwealth's evidence; and
- that the juvenile victim (and her mother) readily became willing participants with the Defendant in these crimes and the attempted cover-up of them; and
- and the uncertainties of a jury trial – especially one involving an elected official;
- then the Commonwealth's Attorney agrees to the following:

9. That upon the Defendant's **Alford / guilty** pleas to the **Contributing Indictment**, the Commonwealth agrees to ***Nolle Prosequi*** the remaining indictments and to recommend to the Court the following agreed disposition of this criminal case:

- 12 months in jail with 6 months suspended conditioned upon 5 years good behavior; and

- It is further agreed that the Defendant shall be **remanded forthwith to jail to serve his active jail sentence**, although it is agreed that the Court shall order that the jail place the Defendant into its **work release** program given his up-coming duties as a Delegate in the General Assembly; (The Commonwealth further has no objection to the Court directing or allowing the Defendant to serve his jail sentence in the Richmond City jail); and
- The Commonwealth's Attorney / Special Prosecutor further agrees to **withhold any other potential criminal charges** against the Defendant, such as **conspiracy to suborn perjury, conspiracy to obstruct justice**, etc, and
- It is understood that no other alternatives to incarceration including Electronic Incarceration Program (EIP), Diversion Center, Detention Center, concurrent time, etc. are available under the terms of this Plea Agreement unless expressly set forth above.

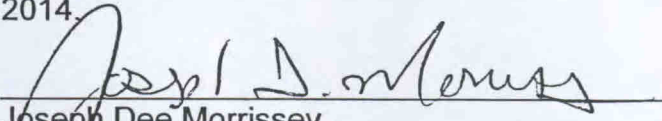
9. I understand that the Court may or may not follow the Commonwealth's Attorney's recommendation and may accept or reject this plea agreement. I understand that if the Court rejects this agreement, I will be permitted to withdraw my "Alford plea" if I so desire, and if I do not withdraw my "Alford plea" neither side is bound by this agreement and the Court may impose any sentence within the limits set forth in Paragraph 4, which disposition may be less favorable to me than is contained in this agreement.

10. I declare no officer or employee of the State or County or Commonwealth's Attorney's office, or anyone else, has made any promise to me except as contained in this agreement.

11. After having discussed the matter with my attorney, I do freely and voluntarily enter an "Alford ~~plea~~ plea" to **Contributing to Delinquency of a Minor** and waive my right to a trial by jury and request the Court to hear all matters of law and fact.

WMA


Signed by me in the presence of my attorneys on this 12th day of December, 2014.

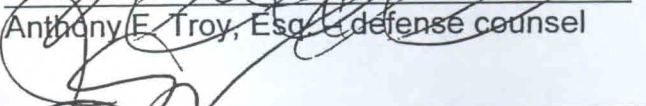

Joseph Dee Morrissey,
Defendant

CERTIFICATE OF DEFENDANT'S COUNSEL

The undersigned attorney for the above-named defendant, after having made a thorough investigation of the facts relating to this case, do certify that I have explained to the defendant the elements of the charges in this case; that I have fully conveyed to the defendant each and every plea offer, if any, made by the prosecution in this matter; and that the defendant's "Alford plea" is voluntarily and understandingly made.


Ward L. Armstrong, Esq. – defense counsel


Anthony E. Troy, Esq. – defense counsel

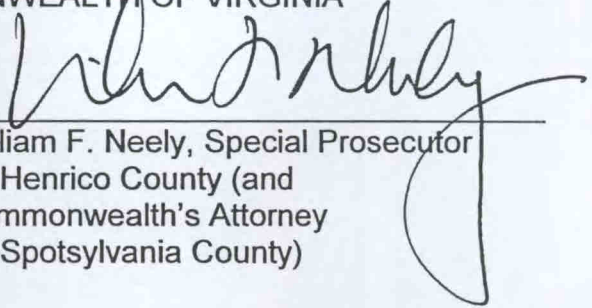

James T. Maloney, Esq. – defense counsel

CERTIFICATE OF COMMONWEALTH'S ATTORNEY

The above accords with my understanding of the facts in this case, and I further certify that, when applicable upon the written request of the victim, I have consulted with such victim(s) and I have notified him/her of the right to be present at this hearing pursuant to Section 19.2-11.01 of the Code of Virginia.

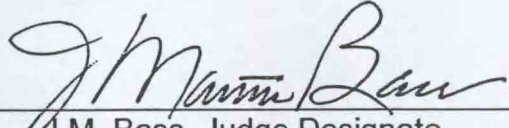
COMMONWEALTH OF VIRGINIA

By:


William F. Neely, Special Prosecutor
for Henrico County (and
Commonwealth's Attorney
for Spotsylvania County)

The Court, being of the opinion that the Alford plea and waiver of jury trial are voluntarily made, and that the defendant understands the nature of the charges and the consequences of said "Alford plea", doth accept the same and concur therewith.

Filed and made a part of record this 12 day of December 2014.


J.M. Bass, Judge Designate

A COPY TESTE:
YVONNE G. SMITH, CLERK


DEPUTY CLERK

Text Timeline

(This does not depict all texts)

Key	Origin
1	Original Texts
2	MP seized cell Phone
3	JM Verizon texts
4	MP iCloud
5	JM Call Logs
6	MP Call Logs

Key
Myrna Pride - JUVENILE Victim
Joe Morrissey - Suspect
Christina (Sister)
Kaelah (Friend)
Diedre Warran (mother)
Brittney (Ex girlfriend)
Jasmine (Friend)
Abe Massad (Friend of Joe's)



2013
Origin Time From TO Message

June 28

4 2:18p Myrna to **Brittney**
4 2:53p Brittney to Myrna
4 2:53p Myrna to Brittney
4 2:53p Brittney to Myrna
4 2:56p Myrna to Brittney
4 3:11p Brittney to Myrna
4 3:12p Myrna to Brittney

Omg Joe morrissey offered me a job
Where ??
At his law firm !!!
When ??
Idk he gave me all his number and told me to call monday
Lol you'd have to drop a job tho
Why are you worried about that ? Aren't you excited that I was offered that ?!
Like that's what I wanna do
Yes babe duh. It'll give u experience
Exactly ! And I'm excited I work with him !! But we were talking and he said he
doesn't think I should major in criminal justice he said English like your dad sai

August 18

4, 5, 6 6:13 CALL
2 8:00p Myrna to **Christina**
2 8:00p Myrna to Christina

JOE CALLS MP (3:27 mins)
No we will not Chris I will show you our text. I moved on I'm talking to someone
else now.
Yeah I'm serious and she won't leave me alone. I feel bad bt I'm not gay Chris. I
like boys! Men! And penis!

August 19

4, 6 8:07p CALL
4 11:42p Myrna to **JOE**
4 11:54p JOE to Myrna

MP MISSED CALL FROM JOE
I'm home hunny
Glad u r home safe. The more time I spend with u the better it gets...and it was
great from the begining!

4 11:58p JOE to Myrna Also, did I mention how much I like touching your body... I think I've explored most of it but I need a few more hours to make sure!
4 11:59p Myrna to JOE I simply agree! The more I spend time with you, the more I become fond of you.

August 20

4 12:01a JOE to Myrna Done deall! Goodnight Miss Pride-sweet dreams
4 12:01a Myrna to JOE You can touch all you want! I need you to allow me sometime to do the same.

4 12:03a Myrna to JOE Goodnight handsome
4 06:48a JOE to Myrna I woke up thinking about you n your hot body...I'm so fucking hard!
4 07:31a Myrna to JOE I smile at the thought, of being something worth dreaming about!
4, 5, 6 07:39a CALL MP MISSED CALL FROM JOE (Joe leaves Voicemail)

4, 5, 6 07:45a CALL "Hey Babe, give me a call. Its about 7:30, just came home from uh, a little bit of a run. Um and uh, you are probably showering, getting dressed but when you get a chance give me a call. Thanks. Bye".
MP CALLS JOE (1:17 min)

2 11:09a Myrna to **Christina** No. Just myself. Unless you want me to bring my buddy Joel
11:14a Myrna to Christina It's who I work for. He in the house of delegates. He gone be my sugar daddy. Lol let me stop playing. I aint' bringing him.

4 2:34p Myrna to **JOE** Am I going to see you today ?
4 2:48p JOE to Myrna Yes!
4 2:50p JOE to Myrna The former...I'm excited baby!
4 2:51p Myrna to JOE Was that a yes for excitement or was that a yes of you yelling at me ?!
4, 3 2:58p Myrna to JOE Ok. See you soon

3 4:59p Joe (unk) LOL, YEAH, IT IS. HEADED TO CHARLES CITY COUNTY FOR FARM BUREAU DINNER TONIGHT. OH JOY OH JOY

4 5:12p JOE to Myrna C u at Farmers Mrk pling lot in 5 min - 10 mins
4 5:13p Myrna to JOE Ok I'm leaving

2 7:00p **Christina to Myrna**
2 7:06p Myrna to Christina
2 7:23p Myrna to Christina
2 7:39p Christina to Myrna

Sooooo I need to talk to you
Why? I'm at a farm thing
I can't right now I will when I get home I'm at a fundraiser
u dating that old ass man and he gave you \$10,000 and shit

3 10:30pm **JOE to Abe**

HEY BUDDY..JUST FUCKED HER ON MY CONFERENCE TABLE AT LAW OFFICE. THEN ONCE AGAIN ON THE FLOOR FOR GOOD MEASURE!

4 10:57p Myrna to **JOE**
4 11:00p **JOE to Myrna**
4 11:01p Myrna to **JOE**

I'm home hunny. I stopped at Walmart to pick up some hair products
Sleep tight babe...I really enjoyed spending time with you Myrna
I really did to Joe ;) goodnight

2,4 11:24p Myrna to **Kaelah**

Omg so I have so much to tell you but the most important thing is !!! I fucked my boss tonight in our office on the desk and then on the floor

2,4 11:25p Kaelah to Myrna
2,4 11:30p Myrna to Kaelah
2,4 11:32p Kaelah to Myrna
2,4 11:32p Myrna to Kaelah

Myrna wtf
Buh nah foreal I He came inside me kaelah !!!!! That's what I really wanted to tell you fucking up Myrna
She mad cause I don't want her ass !!!!! have to tell you the whole story smh.
And I know smh. I just started my birth control today I asked him for 70 dollars so I can get the morning after pill tomorrow smh. I'm scared a lil bit.

2,4 11:33p Kaelah to Myrna
2,4 11:37p Myrna to Kaelah

I don't even wanna hear it dawg
Noooo stop laughing .. Omg he said I'm about to cum inside you I I said no and he i know he heard me and he still came anyway !!!!! I don't get it it I'm like mad I felt it was done purposely a little bit

2,4 11:39p Kaelah to Myrna
2,4 11:42p Myrna to Kaelah
2,4 11:46p Kaelah to Myrna

I told you to be careful Mariel Y'all should have never fucked in the first place, like the hell were ya'll thinking
You did smh. And idk it all went so fast n shit like idk he is so sweet to me n shit but I'm not doing it with him anymore
please don't I omg If you do I just might kill you like deadass and so what if he's sweet. you're there to work not to do that with some 45 year old man, don't get side tracked girl. I'm not judging, you know i've always kept it real with you

August 21
2,4

12:05a Kaelah to Myrna

text me back are you ok

4	07:18a	Myrna to JOE	I woke up this morning and got in the shower and I was thinking about last night, which was wonderful. Now I'm laying here completely naked water dripping off my body and my hair dripping just fantasizing about what you would do to me right now
4	07:19a	Myrna to JOE	I want you to slowly caress my body and lick me all over starting between my thighs
4	07:22a	JOE to Myrna	I wish I was there NOW! Your right, last night was great. Btw, how much time do you want me to spend caressing n luck inking you before I put my cock inside you?
4	07:22a	JOE to Myrna	That's "caressing & licking" you
4	07:24a	Myrna to JOE	Lol I could figure that out. I want you to caress and lick me until I SAY when I'm ready. I will take things under control from there
4	07:26a	JOE to Myrna	Ok. Remember last night I told u I would call in the am n tell u what I was gonna do to you today...
4	07:27a	Myrna to JOE	That would be tomorrow
4	07:28a	JOE to Myrna	Yeah tomorrow which is today!
4	07:29:04a	JOE to Myrna	A pic of you lying there fantasizing about me fucking you
4	07:29:04a	JOE to Myrna	Send me a pic then I'm gonna call you
4	07:37a	Myrna to Joe	Removed due to child pornographic nature
			(See original in Court's file)
4	07:37a	Myrna to JOE	You got me with a fresh face (no make-up) and a fresh body
4	07:37a	JOE to Myrna	GORGEOUS...simply GORGEOUS! I could eat you...but then again I did already!
4, 6	07:40	CALL	JOE CALLS MP (3:59 min)
2, 4	7:45a	Myrna to Kaelah	Sorry. I didn't text back last night I went to sleep. But I'm good I'm going to get my pill this morning

2	8:16a	Christina to Myrna	After she went through my phone I was like why did u do that shit n all that n she was like that's fucked up your sister is sleeping with that old ass man I was idk who tf he is or nothing about that that ain't got nothing to do with going thru my phone
4	9:13a	Myrna to Mom	Joe said to come by the office this week or next week! Bye!
4	9:22a	Myrna to Mom	And come by the office next week before you and daddy leave I Don't bring daddy. Joe don't want to meet him!
3	9:43a	Abe to JOE	U ARE SO LUCKY... CONGRATULATIONS BROTHER
2,4	10:11a	Kaelah to Myrna	ok hope everything is alright
2,4	10:15a	Myrna to Kaelah	Yeah me to. I ain't having no baby if I get pregnant. I'm praying so hard smh
2,4	10:19a	Kaelah to Myrna	but was it good bih
2,4	10:25a	Myrna to Kaelah	Lol was it good? It was great I never experienced anything like that before. He hit it from the back and kaelah for the first time in my life I had an orgasm!
2,4	10:30a	Kaelah to Myrna	lmao, ole Virgin sounding ass I know his ass enjoyed it
4	10:30a	Mom MP	I took off next Tuesday. So I will meet him next Tuesday
4	10:47a	Myrna to Mom	Okay I'll tell him when he come back. Maybe I could suggest us going to lunch I My ear at the shop right now. I got new rotors put on
2,4	10:48a	Myrna to Kaelah	Lmfao I do sound like a Virgin! But yeah he kept laughing and when I smiled he stopped and looked at me and then said my gosh I love your smile you are just so beautiful I I was like shut up and kept going
4	10:52a	Myrna to Mom	Joe is Carls attorney now. Don't tell daddy.
4	10:52a	Myrna to Mom	Omg I So joe hired this new girl Erika to work here and yesterday I had on this white and black dress and she said to me where did you get it and then she said express ? Adn I said yeah and then she said cute I have the same one. And now today she comes in the office and has the same dress !!
4	11:08a	Myrna to Mom	The girl is not cute I Lol I think she want joe. I think he may be in to her to it kinda looked like it yesterday. But he said she used to ovrk for him in his legislative

office. She just graduated from law school. Last night when I left the farm bureau she and him went with each other for "drinks" afterwards.

2,4 11:13a
2,4 11:16a
Kaelah to Myrna
Myrna to Kaelah

lord, imao smh smh smh you're not going to tell your mom are you
No I'm not I'm to scared

4 2:31p
4 3:06p
Myrna to Mom
Mom to Myrna

Joe is talking to Carl now I The conversation sounds a lil intense mommy !!
Wow

2,4 2:45p
2,4 3:09p
2,4 3:13p
Myrna to Kaelah
Kaelah to Myrna
Myrna to Kaelah

Don't tell anyone about what I told you I I will be dead if anyone finds out I And when I say dead I mean literally!
Who am I going to tell I ain't got no friends I'm not do I ever run my mouth ?
I know you don't. But I don't want to die... Literally lol

4 3:13p
Myrna to JOE

I want to come in there right now and fuck you in that chair

2,4 3:24p
2,4 3:27p
2,4 3:28p
2,4 3:55p
Kaelah to Myrna
Myrna to Kaelah
Kaelah to Myrna
Myrna to Kaelah

You're not just don't say anything to the wrong people
I hope so. I'm laughing about this shit now but forreal it ain't even funny I
it's not so if he wants to fuck again are y'all ?
Idk I'm scared. I don't want any babies right now. He does cause he getting older
but idk. He took my car to get everything fixed this morning

4 4:41p
4 5:16p
4 5:19p
JOE to Myrna
Myrna to JOE
JOE to Myrna

Yes, I want you to come in and DO ME!
Thank you so much for getting my car fixed!! I really appreciate it and you I
No problem.happy to help. I'm leaving shortly n going to gym. I'm thinking we
couldget together afterwards for dinner and maybe a movie up near where I live.
What do you think?

4 5:21p
4 5:24p
4 5:24p
4 6:36p
Myrna to JOE
JOE to Myrna
Myrna to JOE
Myrna to JOE

Nothing sounds better than doing that with you I But I have class thats why I
rushed out. Let's do it tomorrow evening ?!
Sounds good. Good luck with your first class
Thanks I talk to you soon
I went by my old job just to say hi and they had really negative things to say
about you n it didn't make me happy. the whole environment was just wierd . I
won't be going there to visit anymore.
Wow, that's a surprise. You talking about old job at foot n ankle or at spa?

4 6:55p
JOE to Myrna

4	6:57p	Myrna to JOE
4	7:00p	JOE to Myrna
4	8:47p	Myrna to JOE
1,4	9:11p	JOE to Myrna
1,4	9:14p	Myrna to JOE
1,4	9:18p	JOE to Myrna
1,4	9:22p	Myrna to JOE
1,4	9:24p	JOE to Myrna
1,4	9:29p	Myrna to JOE
August 22		
1	12:43p	JOE to Myrna
1	12:43p	JOE to Myrna
1	1:01p	Myrna to JOE
1	2:47p	JOE to Myrna
2	2:57p	Myrna to Kaelah
2	3:13p	Kaelah to Myrna
2	3:14p	Kaelah to Myrna
2	3:14p	Myrna to Kaelah
2	3:16p	Kaelah to Myrna

You think that's a surprise? And at the foot and ankle part. It just made me mad. I stay away from negativity
 Yeah, I don't know why folk at foot n ankle would be negative. Oh well, go figure.
 Enjoy first day of class sweetie
 I just had the funniest conversation with my mom about us, but nothing that would hurt you. I told her I won't be home Friday night either
 Hey baby. Just leaving gym. Anxious to hear funny mom story...study hard
 Wish I could have owrked out today. My body is in need of it. But I think i'm going to hit the bed in a few. I'm super exhausted for some reason

Well...maybe my little coed is exhausted from her workout LAST NIGHT!
 Btw, how did first day of classes go?
 Lol. That could be it, but i was tired when I came home last night. Class was great. It was a pretty long lecture, but I think my professor may like me! A LOT!
 Lol, btw I didn't tell you this morning I went to get a plan B jus tin case birth control didn't cover anything.
 Ok. Thanks for update. Of course prof likes you..u r so cute! I'm glad you enjoyed class. Sleep well!
 Thanks hun talk to you later

You brighten my day each n every day I see you!
 While I, of course, love reaching up n touching u between your thighs, I'm hoping the next time I do it you aren't wearing panties!
 As much as I would enjoy not wearing panties, I don't want anyone to see what you have seen. Maybe I could surprise you one day!
 Sounds good!

Yes. Lol omg Kaelah !!! Why I have I been eating so much ? And my stomach feeling funny I'm going to scream I
 you know what to do ! Lol take ak test in two weeks its only been a couple a day or two's
 Two *
 Lol I know smh. I'm just on edge. No more sex for a whiiiiiiell
 lol No more sex with him you mean I Lmfao

2	3:16p	Kaelah to Myrna	dot stress it's only going to make it worse and then you're actually going to feel prego even if you're not remember when I used to get "the test" lol
1	5:54p	Myrna to JOE	Today would have been a perfect day to sit out on your dock and watch the sun set and maybe have some sexual intercourse. Lol talk to you later
1	5:54p	JOE to Myrna	Where r u?
1	5:54p	Myrna to JOE	I just got home.
1	6:00p	JOE to Myrna	Wanna meet me at boathouse restrant
1	6:00p	Myrna to JOE	Yes I Say 7:00 I will choose this time
1	6:11p	JOE to Myrna	Great. See you at 7 at boathouse
6	6:28p	CALL	MYRNA CALLS JOE (0 duration)
1	6:29p	Myrna to JOE	Change of plans lets do this tomorrow. My sister is on her way to the hospital I
1	6:29p	JOE to Myrna	No worries. I hope your sister is ok...call me to let me know something. Ciao Bella
2	6:53p	Myrna to Christina	I just don't know what to believe. I'm in trouble. And I want to be alone
2	6:54p	Kaelah to Myrna	yeah just don't let what happend happen! anybody could put ya'll out Forreal (except me) but she don't know forreal she assuming what your parents say?
1	7:10p	Myrna to JOE	We still have our plans for tomorrow ?
1	7:12p	JOE to Myrna	Of course. Importantly, how is your sister?
1,3	7:12p	Myrna to JOE	Can't wait! And I don't know yet. She seems to be uppity, but she's internally bleeding (received by Joe as SMS at 7:28pm)
1	7:31p	JOE to Myrna	I'm sorry Myrna...pls keep me posted n I will keep her in my prayers
1	7:45p	JOE to Myrna	Ps: Uppity is good!
1	8:08p	Myrna to JOE	Thanks for taking the time to listen and actually care. Thanks you
1	8:08p	Myrna to JOE	While we are at a sentimental moment I thought I should let you know that I like you a lot. Didn't want to admit it. I think your very attractive and caring. Usually the two don't combine.
1	8:08p	Myrna to JOE	You have shown me something new. I never really been to dinner not shared my personal life or feelings to a guy. Tuesday was a wonderful experience and

something I really liked. I would usually do a guy then leave. Not talk to them or anything. Just leave, wouldn't see or talk to them again. But that's a little different with you. Lol. Just to let you know, I'm not possessive or feel a need to control. So you can't cut me loose anytime and I won't give you a hard time! I want us to be a little more discrete and careful because eventually people would put the two in two together and I don't want you in any trouble! Okay? Hope you take this text all in all well!
 Btw just thought I'd share that!

1 8:08p Myrna to JOE
 1 8:08p JOE to Myrna
 1 8:08p JOE to Myrna
 1 8:08p Myrna to JOE
 1 8:24p JOE to Myrna
 1 8:24p Myrna to JOE
 1 9:33p Myrna to JOE

Removed due to child
 pornographic nature

(See original in
 Court's file)

1 9:33p Myrna to JOE
 1 9:33p JOE to Myrna
 1 9:33p Myrna to JOE
 1 9:33p JOE to Myrna

You can see my horrible tan line l... Goodnight!
 Stop it. You're gorgeous and I know gorgeous!
 Only if you think so I Enjoy! Sleep tight!
 U too

August 23

3 2:56p Joe
 6 7:15p CALL
 6 7:19p CALL

WALGREENS RX...JOSEPH, YOUR PRESCRIPTION IS NOW READY FOR
 PICK-UP. CALL 804-264-9587 WITH QUESTIONS. TEXT HELP FOR HELP
 MYRNA CALLS JOE (36 seconds)
 MYRNA CALLS JOE (37 seconds)

2	7:26p	Myrna to Kaelah	Okay so I'm pissed !! I got stood up! And I'm trying to wait around cause I don't want to make plans with you and then Joe shoes up ! But I'm to fucking heated right now kaelah like omg ! Dinner was at 7:00 and look what time it is ! Did you call and see where he's at I'm so pissed I'm sitting here in tears 'n He's prolly coming I called twice !!!! And texted him twice ! And if he was coming then he would have answered !! Fuck it I'm leaving ! Do you want to go to dinner ? Say carrabbas ? I came all the way downtown and wasted toll money and gas ! Like ugh I want to fight ! I just went to dinner last night :(calm down relax you can come over my mom just left Okay its fine
2, 6	7:30p	CALL	MP MISSES CALL FROM JOE
2	7:31p	Myrna to Kaelah	So why he call me after I texted him and told him I was leaving ! I'm soo mad!
2	7:31p	Kaelah to Myrna	what he say when he called ?
2	7:33p	Myrna to Kaelah	He left me a damn voicemail cause I ain't pick up ! I think he was fucking another bitch ! Idc what you do on your spare time ! Don't stand me up ! Fuck who you want but don't make plans with me and don't follow through. He gone say he thought dinner was at 7:30 - ____ - kaelah really?!!
2	7:34p	Kaelah to Myrna	so you in the car
2	7:34p	Kaelah to Myrna	damn, so is he coming..?
2, 6	7:34p	CALL	MP CALLS JOE (51 seconds)
2	7:34p	Myrna to Kaelah	idk but I ain't going
2	7:34p	Myrna to Kaelah	let his ass sit there looking stupid like I did !
2	7:35p	CALL	MP CALLS MOM
2	7:40p	Myrna to Kaelah	I'm on my way home
2	7:45p	Myrna to Kaelah	Fuck you will. Fuck that
2	7:47p	Kaelah to Myrna	Oh well we can talk about it tomorrow

2 7:48p Myrna to Kaelah

Yeah. I'll talk to you later

2, 6 7:54p CALL

JOE CALLS MP

2 10:03p Myrna to Mom

I'm here call you tomorrow

(POLICE CALLED TO HOME)

August 24

2 10:52a Myrna to Kaelah

Can you come with me to get my hair done? I'm scared to go anywhere by my self

2 1:25p Myrna to Mom

Please don't talk to Nana about anything of this situation. She will be so hurt. And I can't take that

2 1:26p Mom to Myrna

I never tell your nana anything

2 1:30p Myrna to Mom

I know but tell daddy and cries the same

2 1:31p Mom to Myrna

Chris already called me said don't let Nana know

2 1:34p Myrna to Mom

Okay please don't

2 1:34p Mom to Myrna

You don't have to keep saying that

2 9:59p Jasmine to Myrna

I heard you and Britaney broke up whhhyyyyy

2 10:14p Myrna to Jasmine

I can't talk to her anymore. I will get in trouble. The issue that is going on now I'm not aloud to speak about to anyone neither is she or we will why in trouble with the law, but eve IF I wanted to talk to her (which I don't) there is nothing that could be said for me to ever consider her a human being. Simple as that