PRE-TRIAL DEFENSE MEMORANDUM

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF [INSERT COUNTY NAME]  
  
State of Washington  
vs.  
William Miller  
Case No.: [Insert Case Number]  
  
This memorandum is submitted on behalf of Defendant William Miller in advance of any hearing or trial regarding the alleged assault incident occurring on or about December 27, 2024.

# 1. Summary of Incident

According to the official police report, Mr. Miller was found in an acute suicidal state, having attempted to hang himself in the garage. Following intervention by the complainant, Candi Brightwell, a single physical contact occurred: a headbutt to the nose. Mr. Miller then immediately fled the scene and was later arrested peacefully.

# 2. Mitigating Mental Health Factors

The defendant has a documented history of PTSD and was in the midst of an extreme mental health crisis. Multiple suicide attempts had occurred in the weeks leading up to the event, including one on December 24, 2024. This aligns with reactive, not predatory, behavior. The headbutt occurred in a disoriented, emotional, and medically vulnerable state.

# 3. Environmental Abuse and Coercion

Mr. Miller was banished from his own home and sleeping in the garage following recent brain surgery. Candi Brightwell controlled the household environment, denying access and leveraging psychological manipulation. These factors are relevant in understanding the reactive nature of the incident.

# 4. Witness Credibility Concerns

The sole witness who claimed that Mr. Miller was “hitting” Ms. Brightwell, Alexis Jones, is her niece and has been previously coerced into turning over private communications. All other reports—including Candi’s own—confirmed a single headbutt only. This discrepancy casts doubt on the reliability of her account.

# 5. Legal Request

The defense requests the Court consider Mr. Miller’s extreme psychological distress, lack of intent, and the absence of repeated violent acts. The defense may seek expert testimony on PTSD and reactive abuse if charges proceed.

Respectfully submitted,  
  
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Attorney for William Miller  
Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_