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WORK PRODUCT

CASE:

STATE VS Billy Lee Oatney C962556CR

WITNESS:

Edith Florence Johnston

1141 E. Rustic R.

Escondido, CA 92025

ATTORNEY:

John P. Manning

DATE:

13 February 1997

TIME:

17:00-19:00

It was my observation that this witness was being entirely truthful in the matters discussed. If there are matters that she was not disclosing, they are matters she is not admitting to herself as of yet, a character trait most human beings possess. It is my belief that the Detectives, in their opinion as to her truthfulness, failed to factor in her age, the relatively recent loss of her husband, the shock factor of her son's situation, and the belief system with which people in her age group were raised with.

Disclosure of personal family matters is difficult, to say the least, for the most recent adult generation. In her day, personal matters were not discussed at all. I feel she was keeping something back, but I don't feel it had anything to do with information about John or Billy, rather about her husband. If her son had been our client, I'd be going for child sex abuse by her husband. She really doesn't want anyone talking to Jacquelyn, and I think the key lies there.

Ms Johnston being in the denial is not the same as lying to police or investigators. It's lying to yourself because the pain of the truth is too hard to bear. This is what I perceived. Given time, and working with Pam Rogers will help. Pam has her work cut out for her