
BEFORE THE GOVERNOR OF THE STATE OF TEXAS

AND

THE TEXAS BOARD OF PARDONS AND PAROLES

In re Ramiro Felix Gonzales,

Petitioner.

**PETITION FOR COMMUTATION OF DEATH SENTENCE TO A
LESSER PENALTY, OR, IN THE ALTERNATIVE, A 180-DAY
REPRIEVE, AND REQUEST FOR AN INTERVIEW AND HEARING
ON THE MATTER**

Ramiro Felix Gonzales is scheduled for execution on June 26, 2024

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TO THE GOVERNOR AND THE HONORABLE MEMBERS OF THE TEXAS BOARD OF PARDONS AND PAROLES:

By this application, Ramiro Felix Gonzales requests that the Texas Board of Pardons and Paroles (“Board”) recommend, and the Governor grant, a commutation of his death sentence to a lesser penalty. In the alternative, Mr. Gonzales requests that the Board recommend, and the Governor grant, a reprieve of execution for 180 days so the Board and Governor may give this application appropriate consideration. Mr. Gonzales requests an interview, and a hearing on the matter.

I.

It is profoundly challenging to comprehend how individuals can commit acts of extreme violence that shatter lives and communities with their brutality. Such offenses outrage our conscience and challenge our deepest convictions about human nature, empathy, and morality. It is thus hard to understand how God could choose those who have inflicted unimaginable harm, rather than those who have toiled to live virtuous and blameless lives, as the instrument for furthering His will for creation. That would seem perverse to those of us who organize our world to recognize and reward good and moral behavior.

Holy Scripture cautions us not to assume we understand the ways and purposes of the Lord. The Bible is replete with stories of how God has taken

those who have sinned gravely, even those who have deliberately caused devastating harm to others, and worked through them to fulfill His design:

- Abram (later Abraham) twice passed off his wife Sarai (later Sarah) as his sister, placing her into the dangerous hands of powerful male rulers in order to protect himself. God intervened each time. Despite this, Abraham is promised that his descendants will become “more numerous than the stars” and through his lineage, the nations of the world will be blessed (Genesis 26:4).
- David was Israel’s third and most important King. He ordered that Uriah be killed in order to cover up his own sexual transgression. However, God continued to work through David for the benefit of his people (2 Samuel 11). He is named in the genealogy of Jesus (Matthew 1:1-17).
- Peter denied Christ when it mattered most, abandoning Jesus to face his crucifixion alone. Despite this, Peter continued to be “The Rock” on whom the early church was built (Acts 2).

There is no way for any of us to know how God chooses His prophets or ministers, or why He would choose to fashion a leader in the faith from the rough clay of a sinner rather than the smooth stuff of a saint. But then, we are not God. We do not need to understand. We need only be open to the reality of God’s power to use whomever He chooses. This openness is the space where mercy lives.

II.

Ramiro Gonzales is scheduled to be executed by the State of Texas on June 26 for the murder of Bridget Townsend, an offense he committed when he was just barely eighteen. At the time, Ramiro was gripped by a serious addiction rooted in his exposure to drugs while still in the womb, compounded by the trauma and neglect that marked his childhood.

Ramiro was born out of wedlock to seventeen-year-old Julia Gonzales Saldaña in Dilley, Texas. While pregnant with Ramiro, Julia—who herself has endured a lifelong struggle with drugs and drink—drank alcohol and abused inhalants and other drugs, at one point even attempting to end her pregnancy by intentionally overdosing. Ramiro’s father, later identified as Jacinto Sanchez, was not listed on Ramiro’s birth certificate and played no role in his upbringing. Although Ramiro and his father lived in the same area throughout Ramiro’s childhood, Ramiro never knew or even met his father until they discovered each other while incarcerated together in the county jail when Ramiro was 19 years old.

Ramiro’s mother Julia gave him up at birth to her parents, Francis and Ramiro Gonzales, Sr. They raised Ramiro in a small cinderblock house, crowded with extended family members, on the sprawling and desolate ranch where his grandfather worked as a laborer. Ramiro’s mother never acknowledged him as her son or cared for him, even though she bore two other

children and raised them herself. Julia's rejection was ever-present for Ramiro: she often visited the ranch with her two other children and her husband Mario, who resented young Ramiro and would beat, kick, and demean him.

Ramiro's grandparents worked long and hard hours, leaving him alone and unsupervised for much of every day. As a child he was often left in the hands of other family members, at least one of whom—a cousin—sexually abused him when he was just 6 years old. Ramiro was later sexually abused by other perpetrators throughout his childhood. Yet young Ramiro never received treatment or caring support because his family didn't acknowledge the abuse, even though many suspected it and some had endured it themselves. *See Exhibit 2 (Report of Dr. Kate Porterfield, Ph.D.).*

When Ramiro was in elementary school, his uncle Johnny married a young woman named Loretta. Ramiro adored his new aunt. Loretta hugged him, praised him, and showed him the love and affection he craved. The two developed a close bond, spending much time together.

But that bond was tragically shattered when a drunk driver killed Loretta in a head-on car collision when Ramiro was 15 years old. Loretta's death plunged Ramiro into inconsolable grief. Despondent and completely unequipped to deal with losing the only source of love and support in his life, Ramiro turned to drugs to numb his pain. Within a year, he had dropped out

of school at age 16. After having repeated multiple grades, beginning in kindergarten, he was still in the eighth grade when he withdrew for good.

In the years that followed, Ramiro's life spiraled out of control. What started as self-medication rapidly became full-blown addiction. While his juvenile criminal record had been inconsequential, Ramiro's deepening addiction led him to steal and forge checks to finance his addiction. He began running errands for his drug dealer, Joe Leal, in exchange for drugs and to pay off his debts. Ramiro's steep descent into addiction ultimately culminated in the tragic kidnapping and murder of Leal's girlfriend, Bridget Townsend, when she was an unexpected witness to Ramiro's desperate attempt to steal drugs from Leal's home a few months after turning eighteen. But law enforcement was unable to solve the case, and Ramiro remained at large.

Eight months later, deeply gripped by addiction to cocaine and methamphetamine, Ramiro committed a second terrible crime, abducting and raping Bandera real estate agent Florence Teich. In October 2002, Ramiro entered a guilty plea to those charges, without any agreement with the State concerning the sentence to be imposed, and received the maximum punishment, life imprisonment. Just days later, after meeting with a San Antonio television news reporter named Gina Galaviz who encouraged him to "do the right thing," Ramiro confessed to Bridget Townsend's murder. He then

led law enforcement authorities to her remains. For this crime, he was sentenced to death.

III.

How those who have committed egregious acts of violence can, through God's grace, experience the miracle of *metanoia*, a transformative change of heart leading to a change in action, is revealed in the story of Saul of Tarsus, later known as Paul the Apostle.

As a fervent Pharisee, Saul sought through zealous prosecution to suppress Christianity, which he viewed as a dangerous and heretical sect within Judaism. Saul, armed with letters from the high priest authorizing him to arrest any Christians he found (which would almost certainly have led to their deaths), was given the mission of curbing Christianity's spread by targeting its adherents in Damascus, a significant center for the early Christian movement. He was single-minded in his murderous purpose. Saul's journey to Damascus, however, was dramatically interrupted by a divine encounter that led to his conversion and subsequent transformation into Paul the Apostle.

Paul went on to share Jesus's teachings and nurture Christian communities throughout the Middle East and Europe. The very earliest New Testament scripture we have comes from Paul, whose epistles were composed

between 48 A.D. and 64 A.D., even earlier than the Gospel accounts. The new, often fragile, communities Paul visited and wrote to looked to him for guidance and instruction. In the earliest days of the church, contact with Paul was often a community's first exposure to what would become not only a *life* altering relationship with God, but one that would save their very *souls* as well. Christianity as we know it today would be unimaginable without his witness. In the places where he spread the gospel and beyond, Paul's words have shaped the character of Christians for generations.

IV.

Like Paul before his conversion, Ramiro was not a good person. He chose to inflict violent and irreparable harm on multiple people. Neither Bridget Townsend nor Florence Teich deserved the cruelty they suffered at Ramiro's hands. The Townsend family, too, lives now with an undeserved and enduring loss. As Paul's zeal to punish liberated his violent impulses, Ramiro's hunger for drugs drove his destructive actions. Those who found themselves in his way were hurt.

But just as Saul of Tarsus encountered something wholly unexpected on the road to Damascus, something remarkable happened to Ramiro in the Medina County Jail as he awaited trial for Bridget's Townsend's murder.

In Ramiro's words:

During this time I had a small country boy preacher that would come down to the jail and randomly speak with inmates that were in lock up. I had been getting into fights a lot and would end up in lock up so I got to speak to the guy a lot. At that time the only reason I would talk with him was because when you're locked up you can't talk with anyone, so any opportunity to speak with somebody is something, I would take it. This guy happened to be the only one around.

Wade Haby and I went on to become really good friends and every time he came down to the prison he would request to speak with me. For some years, although I enjoyed talking with him, my heart wasn't seeking God at that time. But Wade was committed. His commitment to speak to me about God would be one of the keys to my conversion.

It would come down to one night after speaking with him, we were talking about some theological thing, and I hinted that it was easier for him to discover those things and that his bible made it easier for bible study. He had a Key Word Study Bible, and it had all kinds of good self-helps in it.

As I spoke about this to him, without any hesitation at all, he closed his bible and handed it to me. Immediately I refused to take it, but he wasn't taking no for an answer. After he left I stayed awake reading through this bible and going through the self-helps.

A couple days after that, everything in me wanted God. It seemed as if everything on every page of this bible stood out to me and the conviction was so overwhelming that I kneeled down and prayed that God forgive me for everything. Although I wanted to wait for Wade so that he could pray with me, I couldn't. The spirit was just there so strongly and led me to the cross of Christ.

Ramiro in correspondence with his spiritual advisor

Since the moment that "country boy preacher" reached through those bars and handed Ramiro that Bible, Ramiro's life has belonged to God.

In the eighteen years that he has been on death row, Ramiro has devoted himself to self-improvement, contemplation, and prayer, and with God's hand on his shoulder has grown into a mature and peaceful adult. Away from the traumatic chaos of his youth and now in a stable environment, he has grown up in prison. With an understanding that his life on death row was part of God's plan for him, Ramiro does not allow himself to be defined by his past sins, but rather has dedicated himself to following a righteous path and working to better the lives of those around him.

Today, Ramiro is a devoted and supportive friend, someone who practices accountability and values reciprocity in his relationships. He is now someone who loves to read and learn, and a skilled artist who makes work for the people he loves. He devotes himself to prayer and to Jesus' teaching and prayer and, in keeping with his desire to do no harm, has become a vegetarian. He is introspective, patient, and emotionally generous. In submitting to God's will and following Christ, he has become the person he always wanted to be.

Most important, Ramiro at every opportunity shares with others the story of the miracles God has worked in his life. As one death row correctional officer has put it, Ramiro "holds faith high." He has completed numerous religious studies courses; his sermons have been read on the prison radio show here in Texas and have even been delivered at Sunday services of the United Church of Canada half a continent away. He was one of the first to join the

Death Row Faith Based Program, an intensive, voluntary initiative lasting 12 to 18 months, which offers men a separate living area favorable to personal and spiritual change.¹ As soon as it was possible, administrators selected Ramiro as a peer mentor and coordinator for this program, leading an entire pod of men in their religious and self-help studies.

Unfortunately, with the setting of his June 26 execution date, Ramiro has been moved to “death watch,” where he is no longer able to participate in the activities of the Faith Based Program. Ramiro laments his inability to be present for others who are at an earlier point along their own faith journeys and have yet to develop a fully mature relationship with God. Ramiro desires to be with them so that they can fellowship and grow together; to be a spiritual guide who knows what it is to seek the Divine in places so often dismissed as “God-forsaken.” His final interview with “Execution Watch” for radio station KPFT is a sermon of hope for the men of the Faith Based Program—the men from whom, absent the mercy of this Board and the Governor, he will be torn away on June 26.

In a recent meeting with C.F. Hazlewood, TDCJ’s Deputy Director of Religious Services, Ramiro was quick to answer the question Chaplain

¹ Ken Camp, “Texas Inmate Wants to Turn Death Row into ‘Life Row,’” *The Christian Index* (Georgia Baptist Convention, August 16, 2022), <https://christianindex.org/stories/inmate-wants-to-turn-death-row-into-life-row>, 30474.

Hazlewood posed of him: if he were given the choice between going home or staying in prison and ministering to the men at Polunsky, he would choose to remain at the side of those seeking after God as they face execution. “I know my family would forgive me.” Without question, Ramiro knows his call is to minister to those who are incarcerated, just as Paul did during his time of imprisonment. Of course, going home is not an option for Ramiro, nor is anyone asking this Board to contemplate a pardon that would see him return to a life in the free world. But his comments to Hazlewood and others, and his deep desire to continue his ministry, are a testament to how deeply Ramiro feels God’s call for him to minister to the men he encounters within the prison setting. Ramiro takes this call seriously. He does everything he can through his words and actions to demonstrate to those around him that there is another way, a *holier way*, to be in the world—a way that rejects the violence which he and so many incarcerated men have both experienced and perpetrated. Despite the substantial harm his violent choices have caused, Ramiro is a living example of how one can *become* a good and moral person through an ongoing relationship with Christ.

V.

The moral and spiritual choice now before each member of this Board is simple: Is clemency called for in a case where executing Ramiro is the judicially

imposed sanction for a heinous crime, but granting him mercy would save souls that would otherwise be lost? Put another way, is ending this one life more important than preserving others' chance for eternal salvation—their chance through Ramiro's example to find meaning-filled, redeemed lives within the walls of prison?

These are not merely philosophical or theological questions. For many incarcerated individuals, it is faith alone that has saved their lives—both in the literal sense and in those ways God works to make us better than we can ever be without His grace. To men who would otherwise find themselves lost in the despair that festers inside prison, Ramiro encourages hope for the eternal life to come as well as for a full life in this world, wrought by the Spirit of Christ. Would it not be an affront to this divine work of redemption to prioritize retribution over mercy? As Baptist professor and theologian Roger E. Olson writes,

Christians believe that every individual human being might be someone chosen by God for his salvation and for his service. Only God knows with certainty whom he can use for his service, by whatever means (including intercessory prayer), and who still has a chance to repent, believe (trust in Christ) and be saved. When we take another human life unnecessarily, we usurp God's prerogative for that person's eventual salvation or, if they are

already saved, for that person's future service for the Kingdom of God.²

Ramiro humbly serves the Kingdom every single day. From the men in his faith-based group, to those who listen to him preach, to correctional officers who stop by his cell for comfort, to his friends and penpals, Ramiro is a shining example of the redemptive power of God's grace, and the ripple effect that power has throughout the world. Ramiro helps lead people to God, and through God's power they are transformed.

VI.

It is worth contemplating: what would have happened if those early Christians had insisted that taking Paul's life was the only suitable punishment for having killed their brothers and sisters in Christ? Despite real tensions in the early church, nothing indicates that Peter or the other Apostles ever demanded Paul's death. They did not seek vengeance. One can imagine that the families of those he persecuted unto death were unable to forgive Paul. Yet, early Christian leaders and the communities to whom Paul ministered accepted his conversion and yielded to God's judgment that working through

² Roger E. Olson, "Why Authentic Christians Must Oppose The Death Penalty," *Patheos* (Patheos.com, March 7, 2016), <https://www.patheos.com/blogs/rogereolson/2016/03/why-authentic-christians-must-oppose-the-death-penalty/>.

Paul would share the redemptive power of Christ with the greatest possible number.

Given Paul's special role in spreading the Good News to gentiles, it is safe to say that nearly every Christian in Texas today can trace the lineage of their faith back to his ministry. Early followers of "The Way," including those who had known Jesus, clearly saw God's hand at work through Paul, despite his previous violent nature. Once converted, Paul was a committed and unwavering follower of Christ, even unto imprisonment and eventually martyrdom.

Ramiro has also been committed to God and to sharing his faith with other sinners whose lives can be transformed by God's abundant love and forgiveness. Despite never having made it past the 8th grade, Ramiro has devoted himself to Biblical exegesis and with the Lord's help has pursued a bachelor's degree from a theological seminary; he has also studied Hebrew and Greek so he may read the words of God as they were originally sent. Ramiro's prison epistles of peace and love to his many friends, like Paul's sermons and letters, have created a living legacy.

The marker of true conversion is that once Ramiro invited God into his heart there was no going back. That momentous decision brought with it a cost: every day, Ramiro now shoulders the burden of appreciating the pain he has

inflicted on innocent victims, and dealing with the deep shame and remorse he carries for his crimes.

VII.

Ramiro feels true remorse for the horrific crimes he has committed, the innocent life he took, and the enduring pain he has caused the family members and loved ones of Bridget Townsend to suffer. For years, he has sought to express his remorse to the Townsend family and to Florence Teich for the incalculable pain and anguish he has caused them, offering to communicate with them through a professionally trained intermediary who would honor and respect whatever limits they wished to place on such contact and gracefully accepting their refusal to do so. In an effort to convey his profound remorse, he wrote a letter to the Townsend family which was provided to the District Attorney's Office to make available to members of the family if they chose to receive it:

For years now my hopes and prayers have been to reach out to you and your family, but even now I am unsure whether my words will reach you. May God direct and touch our spirits.

I have wanted to reach out to you and prayed about doing so, but I have not known how to tell you how sorry I am for the pain I caused by taking the life of your daughter and sister Bridget. I have wanted to apologize all these years for the hurt and especially the emotional anguish and heartache that I have caused you and your family.

I know my apologies cannot even begin to bring you peace of mind and healing, but I feel that I should still tell you how sorry I am for all the pain and anguish you have suffered because of my actions. I am sorry, deeply sorry, that I took what was so precious to you and I know there's nothing I can do or say to make it better.

I have absolutely no excuse for what I have done and there's absolutely no one to blame but me. I took your daughter and sister from you, someone you loved and cherished. ...

Please forgive me and accept my apologies, and may God bless you and all your loved ones.

letter from Ramiro Gonzales to the Townsend family

VIII.

We ask that in weighing the fate of Ramiro Gonzales, the Board recognize that God, in His infinite and divine wisdom, has sometimes used even formerly violent sinners as the instrument of His purposes. In deliberating on whether to recommend a commutation of Ramiro's sentence, each member of the Board must confront not only the profound complexity of human imperfection and frailty, but also the call to all Christians to reflect God's mercy. Ramiro's journey, marked first by mistreatment and neglect from others, then by his own grave and intentional sins, and finally by his genuine remorse after surrendering his life to Christ, exemplifies the potential for transformation and redemption that lies within every human being created in God's image, no matter their transgressions. Ramiro has shown sincere efforts towards rehabilitation and a deep commitment to making amends. The life-

changing ministry he provides to the men on Death Row—and could provide to many more men in custody if he were serving a sentence of life imprisonment—will be cut short without your intervention.

Make no mistake: souls which could otherwise be saved may be lost depending on your decision. To preserve them, the Board in the highly unusual circumstances of this case need only temper justice with mercy. Your action in this matter can recognize the inherent dignity and worth of every individual, honor God's judgment in determining whose service He requires to build His Kingdom, and stand as a reminder to all that even in our tragic brokenness, we never lie beyond the reach of grace.

PRAYER FOR CLEMENCY

For the reasons stated above, Mr. Gonzales requests that the Board recommend, and the Governor grant, commutation of his death sentence to a lesser penalty, or in the alternative, a reprieve of 180 days so the Board and the Governor may give this application appropriate consideration. Mr. Gonzales also requests an interview, and a hearing on this matter.

Respectfully submitted, this 4th day of June 2024.



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³ Counsel wish to acknowledge the invaluable assistance of Mr. Gonzales's spiritual advisor, Bri-anne Swan, in the preparation of this application.

Requirements of Title 37 of the Texas Administrative Code § 143.42

1. Name of Applicant

Ramiro Felix Gonzales, TDCJ #999513, is incarcerated at the Polunsky Unit in Livingston, Texas. Mr. Gonzales's execution is scheduled for June 26, 2024.

2. Identity of Applicant's Agents

Attorneys Raoul Schonemann and Thea Posel, associated with the Capital Punishment Clinic at the University of Texas School of Law in Austin, and Michael C. Gross, of the law firm of Gross & Esparza in San Antonio, are presenting the application on behalf of Mr. Gonzales.

3. Certified Copies of Documentation

Certified copies of the indictment, jury charge and verdict, judgment and sentencing order, order of execution, and warrant of execution are attached as Exhibit 1.

4. Brief Statement of the Offense

On January 15, 2001, Bridget Townsend disappeared from her boyfriend's home in Bandera, Texas. Her disappearance went unsolved until October 8, 2002, when Mr. Gonzales confessed to the kidnapping and murder of Ms. Townsend. In September 2006, Mr. Gonzales was convicted of capital murder pursuant to Tex. Penal Code § 19.03(a)(2) and was sentenced to death.

The State did not possess or present any evidence, other than Mr. Gonzales's own confession, to support the idea that he caused Ms. Townsend's death, or that he committed any of the three charged underlying felonies.⁴ Mr. Gonzales was not the focus of law enforcement's investigation from the outset, but instead confessed to the unsolved disappearance more than eighteen months after it occurred. Following a jury trial, which took place in Medina County, Texas, despite extensive pretrial publicity in the small jurisdiction,

⁴ Mr. Gonzales was indicted under Tex. Penal Code § 19.03(a)(2) for murder committed "in the course of committing or attempting to commit kidnapping, ... robbery [and/or] aggravated sexual assault."

Mr. Gonzales was convicted of capital murder under the law of parties. After a separate punishment hearing, the jury answered the special issues in a manner requiring death, and on September 6, 2006, the 38th Judicial District Court of Medina County, Texas, entered a judgment sentencing Mr. Gonzales to death.

5. Brief Statement of Appellate History

The Texas Court of Criminal Appeals affirmed Mr. Gonzales's conviction and sentence were on appeal in *Gonzales v. State*, No. AP-75540, 2009 WL 1684699 (Tex. Crim. App. Jun. 17, 2009) (unpublished).

Judge Womack filed a dissenting opinion arguing that the trial court "abuse[d] its discretion in allowing [Dr. Edward Gripon] to offer an expert opinion on the probability that the defendant will commit future acts of dangerousness that will constitute a danger to society" and contending that "[b]efore we accept an opinion that a capital murderer will be dangerous even in prison, there should be some research to show that this behavior can be predicted reliably." *Id.* at *9.

On Sept. 22, 2008, state habeas counsel filed a nine-page habeas corpus application on Mr. Gonzales's behalf; just one month later, the state habeas court entered findings of fact and conclusions of law, recommending denial of habeas relief without a hearing. *Ex parte Gonzales*, No. 04-02- 9091-CR (38th Jud. Dist., Medina County Tex., Oct. 23, 2008). On Sept. 23, 2009, the Texas Court of Criminal Appeals denied relief. *Ex parte Gonzales*, No. WR-70,969-01 (Sept. 23, 2009).

On January 20, 2011, Mr. Gonzales filed a habeas corpus application in federal court pursuant to 28 U.S.C. §§ 2241, 2254. On January 23, 2011, Mr. Gonzales was granted permission to return to state court to exhaust his claims. On February 23, 2011, Mr. Gonzales filed a first subsequent application for a writ of habeas corpus in state court, which was ultimately dismissed. *Ex parte Gonzales*, No. WR-70,969-02 (Tex. Crim. App. Feb. 1, 2012). Mr. Gonzales returned to federal court where, on January 25, 2014, the United States District Court for the Western District of Texas denied the amended application. No appeal was permitted. *See Gonzales v. Stephens*, 606 Fed. Appx. 767 (5th Cir. 2015). The United States Supreme Court denied certiorari to review the decision not to permit appeal on December 7, 2015. *Gonzales v. Stephens*, 577 U.S. 1032 (Mem) (2015).

On October 20, 2021, the 38th Judicial District Court in Medina County, Texas set an execution date for Mr. Gonzales of July 13, 2022.

On July 11, 2022, the Court of Criminal Appeals stayed the scheduled execution date to allow further development of a portion of Mr. Gonzales's claim that the State's forensic psychiatrist, Dr. Edward Gripon, had testified falsely at his trial. *Ex parte Gonzales*, No. WR-70,969-03 (Tex. Crim. App. Jul. 11, 2022). Despite the CCA's order remanding the case for "merits review," Visiting Judge Stephen Ables signed an order finding that no disputed material facts existed, took no additional evidence, and recommended that the CCA deny the authorized claim. Less than 90 days after the trial court's recommendation was sent to the CCA, the pending application was denied and the remaining claims dismissed. *Ex parte Gonzales*, No. WR-70,969-03 (Tex. Crim. App. Jun. 14, 2023). The United States Supreme Court denied certiorari to review the CCA's decision on February 20, 2024. *Gonzales v. Texas*, 144 S.Ct. 828 (Mem) (2024).

On February 16, 2024, the 454th Judicial District Court in Medina County, Texas set an execution date for Mr. Gonzales of June 26, 2024.

6. Brief Statement of Legal Issues

A variety of legal issues are present in Mr. Gonzales's case. They include, but are not limited to, the following: he received ineffective assistance of trial and state post-conviction counsel; that the State utilized false testimony to secure the sentence of death; that the determination of future dangerousness in this case was unreliable and has been proven to be false; that his youth at the time of the crime renders him ineligible for a sentence of death under evolving standards of decency and scientific developments; and that the State relied on materially false evidence to secure the sentence of death in violation of *Estrada v. State* and *Johnson v. Mississippi*.

Further, whether Texas may carry out a death sentence based on a jury verdict which must be found unanimously and beyond a reasonable doubt but is never subjected to meaningful review; that the jury's determination here that there was a probability that Mr. Gonzales would commit criminal acts of violence has been affirmatively disproven and disclaimed by the State's expert who testified in support of this determination renders the death sentence unreliable and unconstitutional; that the complete rehabilitation and reformation of Mr. Gonzales and vitiation of the death-eligibility determination at the time of trial renders him ineligible for the death penalty.

7. Requested Length of Reprieve

180 days.

8. Grounds for Commutation and/or Reprieve

Mr. Gonzales's youth at the time of the offense, the erroneous prediction of future dangerousness, the State expert's own determination that Mr. Gonzales does not pose a risk of future danger to society, Mr. Gonzales's thorough and self-motivated transformation into a mature and peaceful adult and man of God, and the good service he could perform and transformative power of his testimony within the Texas Department of Criminal Justice as a Field Minister.