

# Christopher Leroy Collings

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*Petition for Executive Clemency  
Submitted to Missouri Governor Michael L. Parson*

## 1. INTRODUCTION.

Christopher Collings is scheduled for execution on Tuesday, December 3, 2024, at 6:00 PM.

The circumstances surrounding the death of Rowan Ford are incredibly sad. She was a beautiful young girl who was taken too early, and her death unquestionably is a tragedy. Nothing in this clemency petition is meant to diminish the loss of Rowan to her family and community.

This request for clemency is based on the totality of circumstances of Chris's life that culminated on that tragic night in 2007. Chris's brain is structurally abnormal, and as a result, he suffers from functional deficits in awareness, judgment and deliberation, comportsment, appropriate social inhibition, and emotional regulation. On top of these impairments, and in part because of them, his life is marked by repeated traumatic events along with physical and sexual abuse all throughout his childhood.

Chris did not choose to endure this trauma. Instead, all too often the adults in Chris's life took advantage of him, abused him, or simply ignored

his pleas for help. The result was a damaged human being with no guidance on how to grow into a functioning adult. The effects of this abuse combined with his brain dysfunction impaired Chris throughout his life, and he was never fully able to break free from his trauma-filled existence.

However, the jury considering the appropriate punishment for Chris did not have all the information about Chris's life it should have had. The jury did not know about Chris's brain dysfunction, nor did the jury know about the full circumstances of the abuse Chris suffered and the effect it had on his functioning. The jury also did not see David Spears's confession to killing Rowan nor the four criminal convictions of the officer who obtained the statements inculpatating Chris. Yet when multiple jurors later were presented with this information, they agreed that the appropriate sentence for Chris is life without parole. This conclusion became even stronger when the jurors learned of the sentencing disparity between Spears's case (11 years) and Chris's case (death).

All these circumstances support clemency for Chris. In addition, while in prison, Chris has had and continues to have a positive impact on the lives of many people. With a life without parole sentence, Chris will continue to give back to society while at the same time constantly atoning for his mistakes. Chris

humbly requests Governor Parson to exercise his mercy power and commute Chris's sentence to life imprisonment without the possibility of parole.

## 2. CLEMENCY IS APPROPRIATE DUE TO THE SUBSTANTIAL HARDSHIPS CHRISTOPHER COLLINGS ENDURED THROUGHOUT HIS LIFETIME.

Christopher Collings endured a staggering amount of trauma and abuse that began when he was only a few months old and continued through his teenage years. Along the way there were multiple opportunities for adults and people in

power to step in and make a difference in Chris's life. Instead, decisions outside of Chris's control only served to place him in further jeopardy and subjected him to more and more horrific and damaging trauma.

### 2.1. CHRIS WAS BORN INTO A FAMILY MARKED BY CHAOS AND CRIMINAL ACTIVITY.

Christopher Leroy Collings (born Christopher Dale Pickett) was born on February 4, 1975, in Springfield,



Missouri, to Dale and Barbara Pickett. Dale and Barbara's relationship was chaotic from the outset.

They initially married in 1971 only to divorce two years later. They reunited and were married again in October 1974, just four months prior to Chris's birth. They both had children from previous relationships.

The Barry County, Missouri, Division of Family Services had an active case against the Picketts at the time Chris was born. Chris's mother told the caseworker shortly after she remarried Dale that she was already wanting a divorce and was interested in having a tubal ligation as soon as Chris was born. The caseworker also

noted that the couple did not seem to get along with anyone very well and were always on the verge of losing their housing. Due to the criminal activity of both Dale and Barbara, this came to pass just a few months after Chris was born.

In August 1975, Dale was arrested in Arkansas for a robbery and shooting. Dale was confined to the local jail until he reached a plea agreement and was sentenced to a



*Undated Photo of Dale Pickett  
taken from prison.*

term of 21 years in the Arkansas Department of Corrections. Chris's mother was also engaged in criminal activity of her own.

In the same month Dale was arrested for the robbery and shooting, Chris's mother was arrested for drunk driving. As a result of her offense, Chris and two of his half-siblings were taken from the home and placed in the custody of the Missouri Division of Family Services. Chris was just six months old when he was removed from the home.

Losing her children to foster care did not prove to be a motivation for Chris's mother to turn her life around. Shortly after being released from custody for drunk driving offense, Barbara was involved in a robbery in November 1975. Barbara served as the getaway driver during a robbery and was arrested and charged for the offense. Barbara reached a plea agreement and was sentenced to five years for her part in the robbery. Chris was not even a year old, and both his biological parents had been sentenced to prison for separate violent offenses.

## 2.2. CHRIS HAD THE OPPORTUNITY FOR ADOPTION BUT TO A FAMILY WHERE THE PATRIARCH SEXUALLY ABUSED FOSTER CHILDREN.

Following the removal from his biological parents, Chris was placed in the foster care system. The Missouri Division of Family Services placed Chris with Clarence Leroy “Poncho” Collings and his wife, Betty Collings, from Wheaton, Missouri. The Collings family had a history of taking in foster children, and Chris joined four other foster children in the Collings home when he arrived in 1975. From the outside, Chris’s placement appeared to be a much better living situation. But appearances were deceiving in this case.

The Collings family had three biological children. Their oldest, Debbie Collings, was a successful young woman. She graduated near the top of her high school class and was attending community college when she tragically died in an automobile accident on February 26, 1976, just a few months after Chris arrived in the home. The sudden death of Debbie had a devastating



impact on their family. Poncho was particularly close with his daughter and never seemed to recover from her death.

Chris was the youngest foster child in the Collings home and one of the few that stayed for any length of time. When Chris was an infant, he suffered from febrile seizures. He had seizures in young childhood as well that produced convulsions.

Chris continued living with the Collings family as a foster child until 1982. By that time, the Collings family had decided to adopt Chris. Dale Pickett’s parental rights were terminated, and Barbara executed an

open adoption agreement allowing Poncho and Betty to formally adopt Chris. Chris formally changed his name from Christopher Dale Pickett to Christopher Leroy Collings to honor his new family.

Although Chris was adopted into the Collings family, the family situation was far from ideal. Poncho was a serial womanizer and child abuser. Poncho divorced Betty to marry another woman, Diana Collings. Diana had a daughter from a previous relationship, Julie Heckman, and they moved in with Poncho following the divorce. Julie reported being sexually abused by Poncho from the ages of 6-13. This included Poncho demanding oral sex. Poncho bribed Julie with cash to keep her from telling anyone about the abuse.

Poncho was able to escape responsibility for the abuse even though Julie finally reported the sexual abuse to her mother. Diana didn't initially believe her daughter and remained in the home. The abuse continued, and Julie finally convinced her mother she was being sexually abused by Poncho. Diana moved herself and Julie out of the home and filed for divorce.

Poncho's abuse of Julie was not the first time Poncho abused a young girl in his care. One of the foster children in the Collings home was

Janice Rickle Gorman. Janice reported Poncho attempted to sexually assault her while she was living in his home, but she was big enough to escape him. She reported being afraid of him and tried to never be alone with Poncho in the house. Janice also suffered similar abuse from Poncho and Betty's son, Randy Collings. Randy would come into her room and force himself on her while she was sleeping. She attempted to lock the door to keep him away but was unable to escape Randy's abuse.

Another foster child, Randy Greek, lived in the Collings house as a child, along with several of his siblings. Randy reported that the foster children in the Collings's house were treated much differently than the biological kids. The biological children were fed better food, and "Poncho liked the free slave labor." The boys and girls were kept in separate rooms even though the youngest of the Greek kids was scared to be alone and away from her oldest brother. Russell Greek, the oldest of the siblings, was so concerned about their treatment he begged his aunt and uncle to come and take them away from the Collings's house.

Poncho was also a violent man with a terrible temper and a penchant for physically abusing Chris. One of

Chris's friends, Bobby Cooper, Jr., described Poncho as "not a person you would mess with and I knew Poncho to beat on Chris." Bobby reported seeing Poncho tell Chris to meet him in the barn, and then "Poncho would beat Chris." Bobby

reported this occurred on a regular basis for Chris as he was growing up. Another friend, David Fall, reported seeing bruises on Chris's body, especially on Chris's back and legs.

### 2.3. CHRIS CONTINUED TO HAVE CONTACT WITH HIS BIOLOGICAL FAMILY TO DISASTROUS EFFECT.

Although Chris was no longer legally a member of the Pickett family, he continued to have contact with both Dale and Barbara. These interactions were confusing for Chris and, in the case of his mother, incredibly damaging.

Both of Chris's biological parents eventually were released from prison, and Chris spent time with both Dale and Barbara. One extended occasion with his mother stands out as particularly damaging to Chris's development.

Chris spent a summer living with his biological mom, Barbara, and her then-partner, Charles "Moses" Reeher. Chris was just 14 years old at the time. His mother forced Chris to sleep in a separate area with Moses. Moses was exceptionally strong, and he would grab Chris very hard, just to watch him squirm. Moses began to sexually molest Chris and eventually forced Chris to

perform oral sex on him. Moses continued to abuse Chris and would forcibly rape Chris on a routine basis during the summer. Moses told Chris that in a few years when he turned 18, he would have a sex change operation to become a woman and would be Moses's wife.

Chris's time with his mother and her sexually abusive partner was the breaking point in Chris's childhood development. He returned to the Collings family unable to understand what happened to him. His ability to control his behavior was so damaged that he was sent to a mental health



facility at Heartland Hospital in Nevada, MO. After his hospitalization, Chris was placed at the Northwest Regional Youth Center, a locked facility for juvenile delinquents. While there, Chris confided in a friend, Akil Williams, about the abuse he suffered. Another friend from the center, Michael Cleggett, recalled Chris speaking in group therapy about being sexually abused, and this made him stand out among the other kids in the facility. Michael recalled Chris having a hard time speaking about his experiences and that he cried when recounting the abuse. Chris was picked on and teased by the boys at the facility, but he did not fight back. This experience only further damaged Chris, as it came directly on the heels of his nightmare experience with Moses Reecher over the previous summer.



*Chris Collings and Akil Williams at the Northwest Regional Youth Center*

Chris's childhood history is that of nightmares. Chris was placed into a series of terrible familial situations culminating in sadistic sexual abuse by an adult who should have protected him. The cumulative effect of these traumas – all occurring during critical points in his childhood development – left a broken person without the resources or help that most of us take for granted.

Chris did not choose to be impaired in this way, and sadly, he has never been free from it. These circumstances warrant mercy.

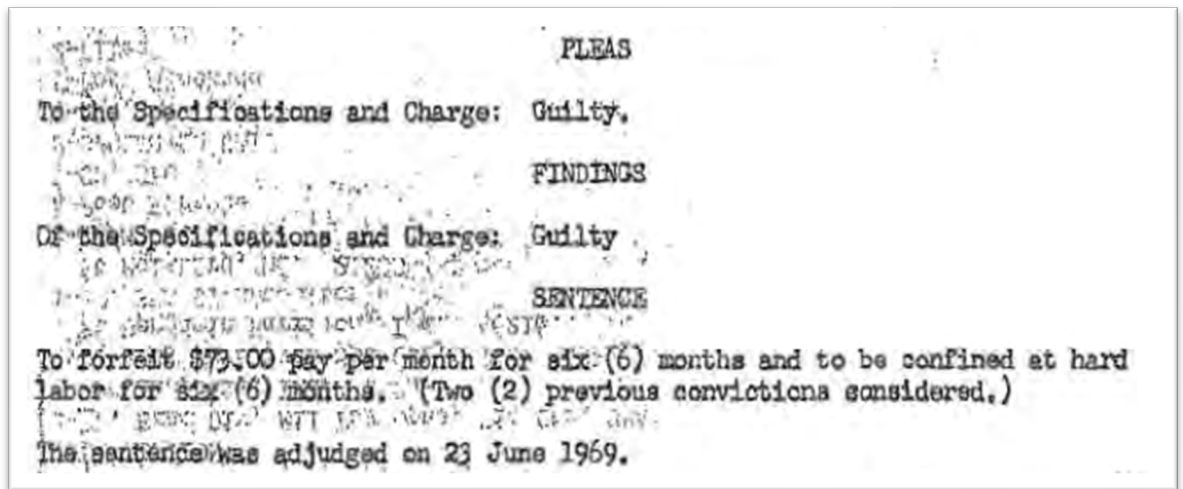
3. TO SECURE CHRISTOPHER COLLINGS'S CONVICTION AND SENTENCE, THE PROSECUTION TEAM WITHHELD INFORMATION FAVORABLE TO THE DEFENSE THAT THE CONSTITUTION AND MISSOURI LAW UNQUESTIONABLY REQUIRED THEM TO DISCLOSE.

The State's primary law enforcement witness – and the key to the State's overall investigation and prosecution of Chris for first-degree murder – was not the upstanding citizen and law enforcement officer he portrayed himself to be to the jury. Wheaton Police Chief Clinton Clark had four criminal convictions for AWOL from the United States Army during the Vietnam War. The State, though, did not disclose this information to the defense and instead provided only limited and misleading information that concealed Clark's troubling past. In doing so the State violated Collings's right to due process of law and right to a fair trial.

After Clark testified at the suppression hearing and the trial court found – based on

Clark's testimony alone, contrary to all the other evidence – that Clark gave *Miranda* warnings to Chris before obtaining Chris's statement, the State then disclosed a single-page report detailing only as follows for Clark:

*Chief Clint Clark, Wheaton Police Department, had one reported incident being arrested in Barry County on January 6, 1968 for Desertion from the U.S. Army with the charge amended to AWOL and an investigative arrest in*



*Clinton Clark's undisclosed military records showing his sentence to six months hard labor.*

*Rogers, Arkansas on November 5, 1968 for*

*investigation of forgery with no disposition shown on either charge.*

No additional information was provided by the State with respect to Chief Clark. However, the State possessed or had available records revealing that Clark's arrest on January 6, 1968, in fact led to an AWOL conviction and sentence. The records also revealed three additional convictions for the same offense. Clark was ordered to serve a sentence of six months of hard labor in the Post Stockade at Fort Leonard Wood, Missouri. Clark was then released in January 1969, and within three weeks of his release, he deserted his post again until he was apprehended on or about May 9, 1969. Clark was again sentenced to six months imprisonment in the Post Stockade at Fort Leonard Wood, Missouri until his discharge "under conditions other than honorable" on October 23, 1969. Clark was absent or in custody for 726 of the 890 days of his service in the military.

But the State never disclosed any of this information to the defense. This withheld evidence unquestionably was admissible and relevant to Chief Clark's credibility as a witness. R.S.Mo. § 491.050 provides:

*Any person who has been convicted of a crime is, notwithstanding, a competent witness; however, any prior*

*criminal convictions may be proved to affect his credibility in a civil or criminal case and, further, any prior pleas of guilty, pleas of nolo contendere, and findings of guilty may be proved to affect his credibility in a criminal case. Such proof may be either by the record or by his own cross-examination, upon which he must answer any question relevant to that inquiry, and the party cross-examining shall not be concluded by his answer.*

Thus, had the State disclosed Clark's convictions to trial counsel, the trial court and the jury would have considered them in their assessment of Clark's credibility.

Chief Clark's criminal convictions are also relevant to his ability to be licensed as a law enforcement officer in the state of Missouri. Requirements for licensure prevent individuals like Clark from serving in law enforcement. See § 590.080.1 R.S.Mo. and § 590.100.1 R.S.Mo. It is likely Clark failed to disclose his criminal history to the state of Missouri as it would have disqualified him from employment in law enforcement. His failure to disclose his full criminal history, along with

the crimes themselves, would have been relevant to his overall credibility as a witness in Chris's criminal trial. Chris has requested that the State provide Clark's law enforcement records, but the State has refused to do so.

Chief Clark was a crucial witness for the State. Clark took the lead role in engaging with Chris in the days following Rowan's disappearance. He met with Chris on multiple occasions throughout the week and, importantly, was the first person to meet with Chris on the day officers discovered Rowan's body. Clark's testimony was the only evidence suggesting – contrary to all other available evidence – that Chris received a *Miranda* warning prior to his interrogation by Clark. Furthermore, the statements Clark obtained directly contradicted Rowan's stepfather's confession admitting to being the only person who committed the fatal act.

Chief Clark's version of the events of his contacts with Chris were absolutely in dispute, and Clark's credibility was central to the trial court's decision regarding the admissibility of Chris's statements. But because the State withheld Clark's criminal convictions from the defense and the court, the trial court was unaware of them. Instead of

disclosing this information to the court, the State instead shielded it, even though Clark himself was engaging in conduct the Missouri Supreme Court described as an “egregious and blatant violation of Collings' constitutional rights[.]” *State v. Collings*, 450 S.W.3d 741, 758 (Mo. banc 2014).

The suppression of Clark's convictions also prevented Chris from relying on them to establish residual doubt, which was one of the principal arguments for a sentence other than death. Defense counsel presented evidence establishing that Spears was one of the last people to see Rowan alive, that he acted suspiciously the day she disappeared, and that dogs alerted to the scent of human remains in the Suburban that he was driving on the night of the offense. Although counsel did not present Spears's confession to raping and killing Rowan, counsel did present the statements of law enforcement officers providing evidence of Spears's involvement to Chris.

If Spears's confession that he was the sole person who committed the fatal act was true, then Chris's confession – obtained by Clark – could not also have been true. The jury thus would have had reason to question whether the police tactics and investigation implicating Chris

were reliable. But due to the State's suppression of Clark's prior convictions, the jury could not consider Clark's convictions when assessing residual doubt.

The State, in their pursuit of a conviction and death sentence, ignored basic due process considerations and protected Clark knowing that he had a significant criminal history that, if disclosed, likely would have sunk their criminal

case against Chris. At least two of the jurors have confirmed that this evidence would have made a difference to them.

The State's violations should not be rewarded, and particularly due to the extreme disparity between Chris's sentence versus Spears's, Chris respectfully requests Governor Parson to commute Chris's sentence to life without parole.

4. CLEMENCY IS APPROPRIATE FOR CHRISTOPHER COLLINGS BECAUSE MULTIPLE JURORS WOULD HAVE SELECTED LIFE WITHOUT PAROLE HAD THEY BEEN PROVIDED WITH ALL THE RELEVANT MITIGATING EVIDENCE.

The jury was denied the opportunity to evaluate all the relevant evidence necessary to make their sentencing recommendation. As discussed above, the State’s withholding of Chief Clark’s criminal convictions prevented the jury from considering evidence that would have made some of the jurors vote for a sentence other than death.

Similarly, although additional mitigating evidence was available to Chris’s defense counsel, counsel did

not conduct the necessary investigation to include this evidence in the case for life. Three of Chris’s jurors have signed statements attesting to the impact the additional evidence would have on their deliberations. This evidence conclusively demonstrates, when given all the information, these jurors would have reached a different decision. In short, the jury’s consideration of this evidence likely would have spared Chris from a death sentence.

4.1. THE JURY WAS DENIED THE OPPORTUNITY TO FULLY EVALUATE CHRIS’S OVERALL CULPABILITY COMPARED TO THAT OF HIS CO-DEFENDANT DAVID SPEARS.

This case highlights the disparity in the application of the death penalty. David Spears confessed to the rape and murder of his stepdaughter and the State separately charged him with first-degree murder as a result. However, after securing Chris’s conviction and sentence, the State walked away from its substantial first-degree murder case against Spears, even though the evidence tying Spears to the murder was more compelling than the

evidence against Chris. Spears was allowed to plead guilty to substantially lesser charges, served a period of 7 years in prison, and then secured employment with the Missouri State Public Defender’s Office upon his release from prison.

The jury was told very little about Spears and his role in the offense. Chris’s trial counsel failed to inform the jury about key parts of Spears’s involvement—including his confession to being the sole person

who committed the fatal act—and left the jury with the false impression that Chris was solely responsible for the murder. As a result, the jury could not fairly assess Chris’s overall culpability for the murder and, most importantly, could not fairly assess the proper punishment for his conduct. Three of Chris’s jurors noted this information would have made a difference in their deliberations of punishment.

***David Spears admitted to the murder of Rowan Ford.***

David Spears was taken into custody on November 9, 2007, after the discovery of the body at the Fox Sinkhole. He was read his *Miranda* rights and agreed to speak with law enforcement. He then confessed to having been involved in the rape and murder of his stepdaughter. According to Spears’s statement, he drove to the Collings property outside of Wheaton, Missouri, and

found the victim and Chris together. Spears then admitted that he had intercourse with Rowan and then used a string or cord to strangle his stepdaughter to death. He did so, according to his statement, after Chris purportedly stated, “It’s gotta be done.” Spears then loaded Rowan into the back of his mother’s Chevrolet Suburban and drove her to the Fox Sinkhole to dispose of her body. Spears claimed that Chris was with him when they dropped the victim into the sinkhole.

Spears’s confession was compelling evidence as it matched the investigation timeline and was consistent with other evidence collected by law enforcement. Spears was able to identify the way the victim died as well as the instrument used – something he would not have known had he not committed the offenses against Rowan. Similarly, Spears knew Rowan had been sexually assaulted. Spears

CJ: Just a minute. Did you have your clothes on?

DS: My pants were down.

CJ: Did you have intercourse with her?

DS: Yes. He hands me this cord and.....I.....I choke her with it. I realize she’s gone. She’s.....she’s really gone. And it’s.....the next few moments were real.....are real fuzzy. I.....I know I’m panicking’.

*David Spears’s statement to law enforcement  
on November 9, 2007, admitting to killing his stepdaughter*

demonstrated detailed knowledge of the crime before the information was publicly released.

Spears's confession also matched the investigative timeline. Nathan Mahurin dropped Spears off at his residence near midnight on November 2, 2007. Spears then called his mother and left his residence shortly after she arrived. Myrna Spears confirmed this timeline at trial. Spears's whereabouts were unknown after departing his home in the early morning hours of November 3, 2007. He did not return home until just before 7:00 AM on November 3, 2007. This timeline left more than five hours – more than sufficient time – for Spears to have committed the actions outlined in his confession.

Spears's confession likewise matched with the cadaver dog evidence. Spears stated he used his mother's Chevrolet Suburban to transport the victim to the Fox Sinkhole. According to Spears, they placed the victim's body in the cargo area of the Suburban. Investigators used a cadaver dog to search various locations thought to be associated with the murder. The only positive identification were two locations in the Chevrolet Suburban. The trained cadaver dog positively identified locations at the driver's side door as well as in the cargo area of the vehicle. These locations were consistent with Spears's confession.

***David Spears lied to investigators and tried to cover-up his involvement in the murder.***

David Spears met with investigators on several occasions in the days following his stepdaughter's disappearance. Spears misled investigators during the initial reporting of his stepdaughter's disappearance. Spears told the reporting officer he recalled the victim waking him and asking permission to go to a friend's house. This information was not true, though. Spears continued to lie in a follow-up interview on November 4, 2007.

Spears tried to convince investigators that he only left his residence on the night his stepdaughter disappeared for a few minutes. According to Spears, he and Mahurin departed the residence to take gas to Chris as he had run out on his drive home. But Spears's wife, Colleen, informed law enforcement that Chris did not have a vehicle at the house that night. Law enforcement confronted Spears about his lie, and he then admitted Chris did not have a vehicle at his home that night. Spears acknowledged he left Rowan at home alone when the three men traveled to Chris's home. Spears did not return home again for at least two hours.

Spears also attempted to obstruct the investigation into his



stepdaughter's disappearance by asking a friend to lie for him. Spears called and left a voicemail for Nathan Mahurin on November 3, 2007. Spears told Mahurin to confirm to law enforcement that the only time Spears left his home was to assist Chris with gassing up his vehicle. Mahurin refused to cover for Spears and provided the voicemail to law enforcement exposing Spears's attempts at a cover-up.

***David Spears knew where the victim was buried: he told a friend where he would hide a body and then led investigators to the site of the victim's body.***

David Spears confided in a friend the location where he would dispose of a body – the Fox Sinkhole. Amber Walters, a childhood friend of Spears, drove to Myrna and Charles Spears's home after she heard from the news about Rowan's disappearance. Walters wanted to check in with her friend and see how he was holding up under the stress.

Walters met with Spears outside his family home in Rocky Comfort, Missouri. Spears was focused on his relationship with Colleen and lamented that the disappearance negatively impacted his marriage.

Spears did not express any concern for Rowan. Spears offered that he didn't know where Rowan was located, but if he were going to dispose of a body, he would do it in the Fox Sinkhole. Walters departed and did not speak with Spears again.

On November 7, 2007, Spears agreed to ride with Mark Bridges, Newton County Coroner, to search for Rowan. Law enforcement officers asked Bridges to conduct the ride-along with Spears because of their relationship. Bridges was friendly with Spears, and Bridges was the first person Spears called when he finally reported Rowan missing. Investigators believed Spears would be willing to speak openly with Bridges during the ride along, so they had Bridges wear a recording device.

Bridges asked him to suggest possible sites they might search for Rowan. Spears first suggested the

**DAVID SPEARS:** You know, that's why we're going to Fox -- Fox Cave first, because -- and it's been years since I've been there, but I can find it. It's -- we were sitting there talking, me and Floyd. And it occurred to me, Fox Cave. If you're going to hide a body, you're going to drop

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it where outsiders wouldn't know where to look. Right?

*Transcript of recorded conversation between David Spears and Newton County Coroner Mark Bridges*

Fox Sinkhole and directed Bridges there. Spears was familiar with the location and believed that would be an ideal location to hide a body. This was the same location he told Walters about just a couple of days prior.

Spears directed Bridges to the Fox

*David Spears harbored a strong interest in younger girls and online sexual experiences.*

The FBI recovered several hard drives from Colleen and David Spears's residence on November 5, 2007. A forensic examination of the hard drives connected to Spears

A brief analysis of the results of the forensics examination showed that there were a number of teenage porn websites that had been accessed from the computer. There was a large number of chat room conversations that had been recorded and were also logged as evidence. There was one (1) pornographic image recovered, showing a young, nude female who was bound and gagged and tied to some form of a post, laying on the floor. The various names of the numerous websites that had been accessed from this computer showed that the subject browsing the websites had a permissiveness towards at least teenage, if not child, pornography.

*December 6, 2007, report of information found on Spears's computer hard drives.*

Sinkhole despite its remote location. Once there, Spears located the opening and peered into the cave. Bridges did as well and reported that he believed he could see something of interest in the bottom of the cave. Neither Bridges nor Spears were able to enter the sinkhole because they lacked the necessary equipment. They soon departed the sinkhole, but Bridges's observations were the impetus for law enforcement to conduct a further search on November 9, 2007.

showed his strong proclivity for teenage porn, violent pornographic images (one was of a young female), and numerous chat room conversations involving Spears where he would share his fantasies about rough sex.

The information contained on Spears's home computer provided substantial corroborative evidence of his sexual preferences for young girls. The history on his computers covered more than two years prior to the murder and well before Chris and Spears were hanging out together. Spears's internet history revealed the true nature of his character and

provided a window into his perverse sexual interests.

*David Spears was allowed to plead to a lesser offense and serve only a minimal prison sentence despite overwhelming evidence of his involvement in the murder of his stepdaughter.*

The evidence against David Spears was substantial and well-documented. At least three jurors have confirmed that this evidence – particularly Spears’s confession – would have made a difference to them, and in combination with other evidence they did not hear, would have caused them to select life without parole for Chris.

The jurors’ belief that life without parole is the appropriate sentence for Chris became even stronger when the jurors learned of the sentencing

disparity between Spears’s case and Chris’s case. Though the evidence against Spears was substantial, the State dropped its first-degree murder case against Spears after obtaining a conviction against Chris. The State’s resolution of Spears’s case allowed him to receive a sentence of only 11 years imprisonment while Chris received the death penalty. This represents a substantial sentencing disparity between two similarly situated offenders.

When provided with this information, the jurors demonstrated substantial concern regarding the disparity. This information compellingly supports their determination that the appropriate sentence for Chris is life without parole.

**4.2. THE JURY WAS NEVER INFORMED THAT CHRIS HAS A SUBSTANTIALLY INJURED BRAIN THAT DIMINISHED HIS ABILITY TO DELIBERATE AT THE TIME OF THE CRIME.**

Chris’s trial counsel failed to consult with a neurologist, which ultimately denied the jury the opportunity to evaluate the impact of Chris’s brain injuries on his conduct and whether he could form the requisite mental intent to commit the crime. This was a crucial error

denying the jury the opportunity to fairly evaluate his conduct.

Neurologist Siddhartha Nadkarni reviewed MRI images of Chris's brain and the results of EEG and other diagnostic testing. This data reveals that Chris suffers from a "multiply injured brain." Chris has "abnormalities in medial temporal lobe structures particularly on the right side[.]" and "the right hippocampus is smaller in size than the left one." These structural abnormalities result in brain dysfunction that affected Chris at the time of the offense.

The EEG data support my conclusion that Mr. Collings suffers from a multiply injured brain. The data show that he has brain dysfunction in the areas of the brain that are responsible for the temporal lobe functions described above, and these impairments are inextricably entangled with and exacerbate his frontal lobe deficits including awareness, judgment and deliberation, comportment, appropriate social inhibition, and emotional regulation.

He suffers from "deficits in circuits that are responsible for functions such as awareness (self-awareness, contextual awareness), judgment and deliberation, comportment, appropriate social inhibition, and circuits involved in emotional regulation[.]" At the time of the crime, these deficits diminished his ability to deliberate:

*In Mr. Collings's case the testing and history support the fact that [his frontal lobe] regions along with abnormalities in the limbic circuit*

*are disrupted, leaving him unable to engage human abilities of judgment, awareness, and comportment, especially in the face of alcohol intoxication. In these states, actions are reflexive, impulsive, and undeliberated, based on primal instincts instead of typical human cognitive consideration.*

These brain abnormalities "made the effects of the alcohol he consumed that day of the crime that much more deleterious to his capacity to exercise judgment and deliberate."

Moreover, at the time of the offense, Chris very likely was "suffering from a state of 'non-convulsive status epilepticus' the

night of the crime." Chris's delirious state of mind and corresponding mental status and confusion substantially impaired his capacity to deliberate. His alcohol consumption exacerbated the effects of this brain dysfunction as well.

These are substantial findings that undercut the state's case against Chris and raise legitimate concerns about whether death is the appropriate punishment in this case. At least three of the jurors specifically reported that this information would

have made a difference to them and would have voted for life without parole instead of death.

**4.3. THE JURY WAS NOT INFORMED THAT CHRIS WAS THE VICTIM OF REPEATED SEXUAL ASSAULTS AS A CHILD AND TEENAGER NOR THE EFFECTS OF THIS ABUSE ON CHRIS'S FUNCTIONING.**

The trial team also failed to make use of the severe sexual abuse Chris suffered and to explain to the jury how that impacted his development and behavior. When Chris was just six years old, he was sexually abused by the son of his babysitter. Chris was told to pull down his pants by the older boy so he could play “weiner in the butt.” Chris was anally raped on at least ten occasions, and this caused severe physical pain for Chris and also left Chris feeling extremely confused.

Chris was then abused when he was 14 years old by his mother's boyfriend, Charles “Moses” Reecher. Chris was spending the summer with his biological mother, and she forced Chris to sleep in a separate area with Moses.

Reecher started to sexually molest Collings and eventually forced Collings to fellate Moses's penis. Moses's abuse continued throughout the summer, and he would forcibly rape Chris on a routine basis. Moses told Chris that in a few years when he turned 18, Chris would have a sex

change operation to become a woman and become Reecher's wife.

Chris shared his traumatic abuse with other boys his age after he was sent to a mental health facility out of town. Chris was placed at Northwest Regional Youth Center, a locked facility for juvenile delinquents. Chris was befriended by another boy at the center, Akil Williams. Akil recalls Chris being picked on a lot because Chris was so different. Chris would not fight back against the teasing from the other boys because he was so timid. Chris also stood out because he revealed he had been sexually abused during a group therapy session. Chris's sharing of this information was significant because no one else at the facility was dealing with sexual abuse. Chris was placed in restraints when he revealed this information because he was so upset, and there was a fear he would harm himself.

The impact of the abuse Chris suffered had profound impacts on his development. Dr. David Lisak, an

expert in male sexual trauma, examined Chris and reviewed his relevant records. Dr. Lisak noted the sexual traumas suffered by Chris left him with “feelings of worthlessness and created a reservoir of rage that Mr. Collings was unable to contain.”

The traumas inflicted on Chris often led to problems with “impulse control and emotional outbursts.” This is consistent with Chris’s history, as he acted out both physically and sexually.

Dr. Lisak’s work, combined with the extensive mitigation development undertaken after trial counsel dropped the ball, paint a far more sympathetic picture of Chris. Dr. Lisak’s report helps to explain why someone with Chris’s history is more prone to alcoholism and addiction. He also explains why someone like Chris – with a history of being abused and then not receiving proper treatment to deal with the abuse – is far more likely to engage in sexual abuse himself.

Contrary to what the jury heard, Chris did not have a normal childhood. Because it was not presented to them, the jury could not consider the full impact of the traumas Chris experienced throughout his life. The statements of at least three jurors confirm that had they heard this information, they would have voted for life without parole.

The statements of the jurors are powerful evidence showing that the omitted mitigation evidence was meaningful; it would have made the difference between life and death. Had they the power to do so, these jurors would commute Chris’s sentence to life without parole. Chris humbly requests that Governor Parson value the determination of these jurors and commute Chris’s sentence accordingly.

5. CLEMENCY IS WARRANTED FOR CHRISTOPHER COLLINGS  
BASED ON HIS POSITIVE IMPACT ON SOCIETY

Christopher Collings has had a profoundly positive impact on so many people that have encountered him through his life. The letters of support included in this clemency submission speak to his ability to connect with a wide variety of people in all walks of life. He is a caring friend, a trusted confidant, and a person that truly cares for the lives of others.

Chris is a father of two young women who he adores and who represent the very best of him. Chris's daughters, Skylar and Susan Collings, were born from his marriage to Kimberly Jones. Chris departed their lives when they were very young, and one of his greatest regrets is not being around during their formative years. Despite the significant challenges of maintaining a presence in their lives from prison, Chris has built a close connection with both of his daughters. He is in

regular contact with them and is extremely proud of the strong young



*Chris with his daughters Susan (left) and Skylar (right).*

women they have become.

Chris has also made a positive impact on many people he has met through his life. In each case, the people that have met Chris have spoken of his “kind soul” and described him as a “good and decent man.”

Chris demonstrated his true character by supporting people in his life during “challenging periods.” Chris demonstrated his kindness through being an “open ear” for their problems and being “instrumental in their recovery” from traumatic circumstances.

Chris demonstrated his kindness to other inmates and prison staff throughout his time in the Missouri Department of Corrections. Chris was described as a person that brings “peace and calm” in the prison setting. He has shown compassion for the mentally ill and taken care of them when they faced real peril in the prison setting.

Chris has been actively involved with several important programs in the prison. Chris is involved in the restorative justice program and has dedicated his time to knitting scarves and hats for premature babies. Chris also has participated in the Puppies for Parole program. Chris trained many dogs and took pride in caring for the dogs and training them for their forever homes. Chris had the patience to care for his animals and to train them knowing that they would be adopted by a family and cared for as he did. Chris took pride in working with every animal he trained no matter how hard it was to see them



leave after making a real connection with them.

Chris’s life since he has been incarcerated demonstrates his true nature far more than any other time in his life. Chris has been clean and sober since 2008, and his conduct and actions reflect the work he has put in to bettering himself. Though his brain dysfunction still impacts him and the horrors of the trauma he suffered still haunt him, he is a compassionate man who wants to help others. This is who he is at his core.

Commuting Chris’s sentence to life imprisonment would recognize the power of redemption and encourage others like Chris to better



themselves even when there appears to be no hope for the future.

6. CONCLUSION.

Under all the circumstances described above, a clemency grant is appropriate. Christopher Collings

humbly requests that the Honorable Governor exercise his mercy power to commute his sentence to life without parole.

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COLLINGS