

COMMONWEALTH OF MASSACHUSETTS

BRISTOL, SS.

SUPERIOR COURT
CRIMINAL BUSINESS
NO. 6298

COMMONWEALTH)
)
V.)
)
CARL H. DREW)

AFFIDAVIT OF CARL DREW IN SUPPORT
OF HIS MOTION PURSUANT TO MASSACHUSETTS
RULES OF CRIMINAL PROCEDURE RULE 30 (a) (b) (c)

I, Carl H. Drew, being duly sworn according to law
depose and state the following:

1. I was convicted of first degree murder on March 13, 1981, before the Honorable Francis W. Keating. I was sentenced accordingly. I am currently incarcerated at MCI-Norolk, P.O. Box 43, Norfolk, Ma. 02056.
2. I was born in Concord, New Hampshire and lived their most of my life. I moved to Fall River, Massachusetts in the year, 1974.
3. I met Karen Marsden on the month of February, 1979 at a friends house. I dated her once after that meeting and she called me back to show her the streets. She worked for me for a couple of days and then she went on her own as a prostitute.
4. I, as a pimp during that time period, have seen many women come and go. I did not see Karen Marsden's desire to leave as financially crippling, because I had other women working for me.
5. My relationship with Lea Johnson was that she is a prostitute and I was her pimp. She lived with me for

a short time, from April of 1980, until May of 1980.

I thought her to be quite unreliable, because quite often I would find her incoherent and hallucinating on mescaline and THC at the apartment.

6. I have never given Lea Johnson any indication that I was involved in any homicide, nor have I been involved in a homicide.

7. I met Robin Murphy at Maureen Sparda's house, about the end of 1978. Robin and I were neither friends or enemies at the time. It was not until I caught her stealing one of my girl's identification card, Margarida Revorido's.

8. I confronted her , concerning the Id. card. Robin gave me a lot of smart mouth over it and I smacked her on the face. She told me "You're going to pay." Robin then went and picked up the Id. card, I remember these occurrences to be about January of 1980.

9. I didn't know that I would be paying such a heavy price for that slap on the face, when I found myself in front of a judge and jury on March 2, 1981, accused of murdering Karen Marsden. The motive for killing Karen is that I was allegedly involved in the Dorren Levesque homicide. I've never even met Doreen Levesque, I've never saw her face until the police showed me a photograph of her.

10. My trial attorney John Birkness told me that he was taking care of contacting my alibi witnesses. He told me that he was taking care of everything.

11. Francis O'Boy, had led me to believe that he was furthering my appeal in the courts. I did not know

that this attorney had been doing absolutely nothing until I asked the Board Of Bar Overseers to send my file that I've been asking for from attorney O'Boy. I received the file at the end of last year or the beginning of this year.

12. I have a very limited education, I have the equivalent of a 5th grade education. I did not know of the outrageous prosecutorial misconduct and ineffective assistance of trial and appellate counsels until this year. It was not until I had a person here in the prison go over my transcripts and file that I knew of the scandalous outrage against me. I have maintained my innocence through out the years and again I say, I am innocent!!!

Signed under the pains and penalties of perjury
this _____, day of _____, 1991

CARL H. DREW
MCI-NORFOLK, P.O. BOX 43,
NORFOLK, MA. 02056