

CONFIDENTIAL MEMORANDUM

Attorney-Client Privilege



Memo

To: File
From: Stacy Ferraro
Case: McKenzie Chapman
Re: Interview with Earnest Brown
Date: October 5, 2017

Name, address, contact information

Earnest Brown
Tracewood Apartments
6300 Old Canton Road
Apt 1D
Jackson, MS 39211
601-999-9999 (cell)

Circumstances of contact

Stacy Ferraro met Earnest Chapman at his apartment. We met for an hour.

Substantive information obtained from interview

Earnest is McKenzie's great uncle. His sister is Earline Chapman. Earline was a good church woman. Earline was very involved in community events. She was a member of the NAACP. Her husband Lawrence was a leader in the NAACP.

Earnest says his parents Earnest and Molly Brown were from Scott County. They all grew up on a farm doing hard work. There were 6 Siblings:

- 1) Earnest Jr
- 2) Eric. Eric shot himself after killing his wife. His wife was cheating on him with his best friend.
- 3) Evelyn Brown Simmons lives in Chicago. Evelyn is married to Shaun Simmons and has 3 children.
- 4) Estelle Lewis lives in Memphis, TN.
- 5) Earline (deceased 2012)
- 6) Edward Chapman lives in Jackson, MS

Earnest's father was a farmer who was killed in an accident when he shot a snake in a shed near some TNT. The shed blew up. His mother died from cancer.

Earnest says that Rita was addicted to crack for as long as he can remember. Rita lived with her mother and treated her mother real bad. Her mother tried to take care of Rita's children.

Rita never tried to quit. Rita never went to rehab.

Rita sold her food stamps so she could buy drugs. Rita would sell anything she could get her

hands on. Rita would sell her body to buy drugs. She taught McKenzie to steal. When she brought men home, McKenzie would hide under the bed and take money out of the man's pants when the pants hit the floor.

Earline used to pin her money in her bra to keep Rita from stealing from her. Rita would sneak into the bedroom and cut the money out while Earline slept. Rita taught McKenzie to cut the money out of his grandmother's bra.

One time Earnest brought a chicken to the house for Earline to cook. Rita was very excited about the chicken and asked Earnest if he had anymore. Earnest brought 3 more chickens. He later found out that Rita took the chickens down the street and sold them.

Earnest never knew anything about McKenzie's father. He never saw him.

Impression

Follow-up Needed