

January 26, 2015

Mr. Richard A. Rossman
Executive Director
National Association of Former United States Attorneys
27 Oakland Park
Pleasant Ridge, MI 48069

Dear Mr. Rossman,

The purpose of this letter is to notify you of the outstanding performance of Mr. Steve Easton as the lead defense counsel in United States versus Sergeant Kayla Cerda, a General Court-Martial held at Marine Corps Recruit Depot, Parris Island, South Carolina in December of 2014. His representation of our client is commendatory based on the reasons set forth below.

As background, I met Mr. Easton while a student at the University of Wyoming, College of Law. Mr. Easton taught my Criminal Procedure and Trial Practice classes and he was also my moot court competition coach for the Regional Trial Competition held in Portland, Oregon in the winter of 2011. Just before I graduated in May of 2011, Mr. Easton and I talked very generally about trial work. He encouraged me to become a trial attorney upon my return to the Marine Corps and told me, "if you ever need help, please call me." I knew he was sincere in his offer and I kept those words in mind in my first couple of years as a new judge advocate in the Marine Corps.

I found myself undermanned and overwhelmed in the Cerda case to the point that I realized that I was not competent enough to take this case on by myself with the team I had. I believed in my client's innocence despite 28 counts, 75 witnesses, thousands of pages of evidence, the prosecutors' confidence in their case, and multiple complaining witnesses saying my client assaulted them and I wanted to make every effort to prevent an injustice in her case. I could not do it alone given the challenges and other factors facing my client, the majority of which I do not have permission to discuss. I assure you, they were numerous and complicated. Incidentally, my client did not have the financial resources to retain a civilian defense counsel. She was however, authorized one military defense counsel at no charge, which she had. So, faced with the fact that no more help was headed our way, I turned to the one person I knew had the work ethic and experience to tackle a case such as this one, Mr. Steve Easton.

Mr. Easton joined the Cerda team in August of 2014 and provided pro-bono services to our client. His impact was immediate and extremely positive. As an example, the motion to compel expert assistance that I filed, argued, and lost three times, won on the fourth round because of Mr. Easton's experience and work ethic. The military judge presiding over the case told us during the hearing that he changed his mind after hearing Mr. Easton's argument and granted our motion for a memory expert – which ended up being crucial to our case, because Mr. Easton was so persuasive. In a case with a voluminous number of witnesses and charges, Mr. Easton also brought organization and structure to our team. He implemented a to-do list that assigned tasks by name with deadlines. This sounds like a small thing, but in an unwieldy case such as ours, the document he created helped us get ahead of our opponent. Mr. Easton also took on the biggest witnesses in the case: the expert, the accused, and several percipient witnesses. His tenacity and professionalism in the courtroom were recognized by all, even the military judge. A term of years in confinement, a Dishonorable Discharge, reduction to the lowest military pay grade, and total forfeiture of all pay and allowances stared our client straight in the eyes at the conclusion of the case if she were convicted. However, the jury returned their verdict and justice was done. Despite starting the trial with 28 counts, she was acquitted of all charges. She is now preparing to execute orders to Camp Pendleton,

California as a free woman, exonerated of everything and marching forward with her Marine Corps career. I do not believe this would have been an acquittal case without Mr. Easton.

It was an absolute pleasure working with Mr. Easton and I hope that someday, I will get the opportunity to try a case with him again. I learned so much by his example. He truly knows how to try a case and win. The Cerda case was his first case as a criminal defense attorney and because of his zealous advocacy, professionalism, and tenacious work ethic, he is batting .1000 and more importantly, our client moved on in her career, free of all accusations against her.

The State of Wyoming and the College of Law should be very proud of Steve Easton's work in the Cerda case. He represented the State and the Law School well.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessi Martz", written in a cursive style.

Jessica Grace Martz
Major, U.S. Marine Corps