



March 20, 2019

Ms. Kimberly M. Foxx
Cook County State's Attorney
69 W Washington
Chicago, IL 60602

Via email to marny.zimmer@cookcountyil.gov

Re: Request for Dismissal of Charges Against Jonice Robinson

Dear State's Attorney Foxx:

Chicago Community Bond Fund (CCBF) was founded in 2015 to help people accused of crimes in Cook County who could not afford to pay their money bonds. Since then, we have paid bond for more than 200 people and supported them while their cases were pending. Today, we are writing you on behalf of one of those individuals: Jonice Robinson.

Ms. Robinson was arrested on June 24, 2018 and charged with first degree murder for taking action to ensure her survival during an incident of domestic violence. After reading about the tragic events in the Chicago Sun-Times, CCBF immediately reached out to Ms. Robinson's family to help secure her release so that she could fight her case from a place of freedom.

On August 21, 2018, CCBF paid \$30,000 to free Ms. Robinson from Cook County Jail on a \$300,000 D-Bond. As a result of the nearly two months she spent in jail, Ms. Robinson lost her job and her apartment where she had lived for about one and a half years. CCBF secured Ms. Robinson new housing at the Grace House re-entry home so she could be released on electronic monitoring. As Ms. Robinson awaits trial, her life has been put on hold, and the emotional and mental stress she is enduring is staggering.

Since her release from Cook County Jail, CCBF has worked to support Ms. Robinson. Over the last few months, multiple CCBF volunteers have come to know Ms. Robinson to be a kind and compassionate woman. She also has received widespread community support from groups that are committed to ending gender-based violence, such as Love & Protect, Moms United Against Violence and Incarceration, Chicago Books to Women in Prison, and the Chicago Metropolitan Battered Women's Network.

We understand your office is reviewing Ms. Robinson's case. We would like to provide additional information for your consideration regarding the history of abuse Ms. Robinson endured prior to the June 24, 2018 incident, as well as Ms. Robinson's character. As you have done with other criminalized survivors of domestic violence in Cook County, we urge you to

seriously consider this mitigating information. We implore you to drop all charges against Ms. Robinson.

History of Abuse

On June 24, 2018, Ms. Robinson defended her life against yet another attack by her then boyfriend, Eric Smith. This attack escalated to the point that Mr. Smith was choking Ms. Robinson, and she feared for her life. The Berwyn Police Department's own statement about the incident posted on their Facebook page notes that "residents reported hearing some type of domestic-related altercation between a male and female resident followed by a series of gunshots and screams." This incident was not the first time that Mr. Smith had become physically violent with Ms. Robinson during the approximately seven months that they dated.

During the first week of March 2018, for instance, Mr. Smith became enraged after a seemingly harmless and joking comment Ms. Robinson made about how much time he spent in the bathroom. Mr. Smith physically assaulted Ms. Robinson, causing her to fear for her life. During this incident, he pulled her hair, stomped on her feet, hurt her hand, and choked her multiple times, to the point that Ms. Robinson lost consciousness. He also pulled Ms. Robinson's own gun, for which she had a license and concealed carry permit, on her. During that incident, Mr. Smith injured Ms. Robinson's hand so severely that she sought medical attention approximately one week later at a hospital. She did not disclose the domestic violence to anyone at the hospital at that time due to fear of how Mr. Smith would respond. Instead, Ms. Robinson told hospital staff that she had been attacked by a patient at the assisted living facility where she worked at the time.

Another particularly frightening incident occurred in early to mid April 2018 (between approximately April 11-15). Mr. Smith was drunk, verbally abusive, and continuously pushed Ms. Robinson. When he went to the bathroom, Ms. Robinson used the opportunity to call the Berwyn police for assistance. The officers who arrived removed Mr. Smith from Ms. Robinson's home, but no report was made. Ms. Robinson was most concerned with having the officers intervene to prevent the violence from escalating in the moment and to get Mr. Smith away from her.

As we are certain your office is well aware, these incidents, particularly choking and threatening with a firearm, rate incredibly high on domestic violence danger assessments and are associated with lethality (Campbell et al., 2003; Roehl et al., 2005). Furthermore, Black women are particularly vulnerable to intimate partner homicide, as Black women are four times more likely than white women to be murdered by a boyfriend or girlfriend (Catalano et al., 2009). As a Black woman who had already experienced severe violence at the hands of her partner, it is extremely reasonable that Ms. Robinson feared for her life during the June 24, 2018 incident. She believed that Mr. Smith was going to kill her, and research on intimate partner homicide validates her fear. It is likely that if Ms. Robinson had not defended herself against this attack, she would have been killed.

Ms. Robinson faced significant barriers to leaving Mr. Smith. For one, she genuinely loved him and hoped that he would end his abusive behavior. As is common in domestic violence relationships, Mr. Smith apologized for his behavior and promised to change. Ms. Robinson wanted to believe him. Additionally, Mr. Smith provided her with financial assistance. Despite being employed full-time, Ms. Robinson relied on Mr. Smith financially. Both of these issues are common barriers cited in the domestic violence literature about challenges women face when trying to exit an abusive relationship (Focht, n.d.).

Ms. Robinson is clearly a domestic violence survivor, but that is only one part of her identity. She also is a loving daughter and sister, a college graduate, and a healthcare professional. Throughout her life, she has overcome challenges imposed by poverty and violence to become the accomplished, caring woman she is today.

Character Information

Ms. Robinson attended Northeastern Illinois University (NEIU) from 2009-2015, graduating with her bachelor's degree in Justice Studies. Ms. Robinson was drawn to this degree because of her desire to help people. She viewed working within the criminal justice system as a way to make a positive impact in people's lives and in her community. The NEIU instructors encouraged students in the Justice Studies program to earn a PERC card, which is a security license, and seek out work in the field in order to gain experience and build up their resumes. The instructors also suggested applying for a Firearm Owners Identification (FOID) card to further enhance employment opportunities after graduation. Ms. Robinson followed both recommendations and began working as a security guard at a bank. The company that placed her in this location encouraged Ms. Robinson to complete a concealed carry and firearm training course, which she did at Chicagoland Firearm Training. Ms. Robinson obtained her Illinois Concealed Carry License through that training program. Ms. Robinson ultimately left her security position at the bank due to a man in the neighborhood who continuously harassed her. This man was known in the neighborhood for having conflicts with others, particularly a past altercation where he shot someone. Ms. Robinson did not feel safe in her position at the bank and decided to leave as a result.

During her time as an undergraduate student at NEIU, a friend suggested that Ms. Robinson become a certified nursing assistant (CNA). This work also appealed to Ms. Robinson because she viewed it as a way to help people. When she began working as a CNA in a nursing home, Ms. Robinson found that she loved this work. She enjoyed working with the elderly residents, many of whom had dementia. Ms. Robinson valued the humbling nature of the work and the opportunity it provided to care for others.

Ms. Robinson is a caring, intelligent woman who has made important contributions to her family and community. She is a devoted daughter who provides critical financial and emotional assistance to her mother. She has two sisters and one brother. Her two younger sisters, in particular, look up to her as a role model. Ms. Robinson is eager to begin working again so that she can support herself and resume helping her family.

Closing

Ms. Robinson is eager to begin healing from the trauma she has survived. Your office has the opportunity to do the right thing in this case. You have the power to send the clear message to Ms. Robinson and all domestic violence survivors that their lives are valuable and that the state will not punish them for defending their lives in the face of repeated violence from an intimate partner. CCBF and the undersigned organizations urge you to drop all charges against Ms. Robinson and allow her finally to have a chance to move forward from this tragic experience. Please direct any follow-up questions to Ms. Robinson's attorney, Assistant Public Defender Paul Christiansen, at paul.christiansen@cookcountyil.gov. Thank you for your time and consideration in this case.

Sincerely,

Chicago Community Bond Fund
A Long Walk Home
BYP 100
Circles & Ciphers
Love & Protect
Moms United Against Violence & Incarceration
The People's Lobby
Trinity United Church of Christ, Chicago
The Unitarian Universalist Prison Ministry of
Illinois

Cc: Marny Zimmer, Director of Policy *via email to* dionne.alexander@cookcountyil.gov