

IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE

ZACHARY RYE ADAMS,
PETITIONER,

vs.

STATE OF TENNESSEE,
RESPONDENT.

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No. 17-CR-10-PC

STATE'S RESPONSE IN OPPOSITION TO KATIE SPIRKO'S
MOTION TO QUASH SUBPOENA DUCES TECUM

COMES NOW, the State of Tennessee, by and through counsel of record, and files this Response in Opposition to Katie Spirko's Motion to Quash Subpoena Duces Tecum. For cause, the State would show as follows:

- I. **Dr. Katie Spirko is a licensed neuropsychologist who has actively participated in Petitioner Adams's post-conviction case, and Dr. Katie Spirko represented herself to this Court, Tennessee Department of Corrections, and the federal holding facility in Memphis, Tennessee as a neuropsychologist – not a member of the media.**
 1. Petitioner Adams's post-conviction pleadings are replete with references to Dr. Katie Spirko's work and involvement in this post-conviction matter.
 2. On January 22, 2024, Petitioner Adams filed a sworn affidavit of Dr. Katie Spirko (included her *curriculum vitae*), with this Court that laid out a detailed description of Dr. Katie Spirko's professional credentials, summations of her interviews with numerous witnesses involved with this matter, and conclusions based on her investigation.
 3. Upon information and belief, Dr. Spirko video recorded her interview with Petitioner Adams on December 1, 2023, in the Tennessee Department of Corrections. Upon

FILED 7 DAY OF March, 2025 AT 4:30 AM/PM
TAMMIE WOLFE, CLERK
BY Tammie Wolfe (CLERK)

information and belief, partial footage of this interview was broadcast by ABC News 20/20 on May 31, 2024.

4. On December 15, 2023, Attorney Bates's office emailed the visitation office for the federal holding facility in Memphis, Tennessee. "Neuropsychologist Visitation" was the subject of the email, and the following information was provided:

1. Dr. Katie Spirko / Forensic & Clinical Neuropsychologist / D.O.B. (omitted)
2. Business name: FACTS (Forensic Assessment & Clinical Therapeutic Services)
www.facts.care, 2200 21st Avenue South, Suite 401 Nashville, TN, Tel: 402-680-4229
3. Inmate: Jason Autry
4. Visitation request: December 22nd, 2023, from 10:00 a.m. – 1:00 p.m.
5. DL#: (omitted)
6. Dr. Spirko would need to be in a non-recorded interview room (Attorney visitation room) and would request to bring in her laptop and a electronic device for transcribing purposes.

See attached **Exhibit "A"** for 12/15/2023 email.

Importantly, Dr. Katie Spirko's visitation with Inmate Autry was represented to the federal inmate visitation center as a "neuropsychologist visitation".

5. On December 18, 2023, Attorney Bates's office sent a follow-up email to the federal inmate visitation center advising that Dr. Katie Spirko would like to bring her assistant for the "neuropsychologist visitation" on December 22, 2023. See attached **Exhibit "B"** for 12/18/2023 email.

6. Dr. Katie Spirko met with inmate Jason Autry for her “neuropsychologist visitation” on December 22, 2023, at the Shelby County Division of Corrections Visitation Office. Dr. Katie Spirko, working on behalf of Petitioner and Petitioner’s attorney, video-recorded a conversation in federal prison with Inmate Autry about his testimony during Petitioner’s trial that was provided by Spirko to ABC News 20/20.
7. On April 1, 2024, Dr. Katie Spirko, in an email attempting to schedule a Zoom meeting with Petitioner Adams, represented to TDOC that she was “Dr. Katie Spirko”, with her signature stating she was “Katie Osborn Spirko, PsyD” and that she was a “forensic & clinical neuropsychologist”. *See* attached **Exhibit “C”** for 4/1/2024 email with TDOC. At no time in this email did Dr. Katie Spirko represent to TDOC that she was meeting with Petitioner Adams for media purposes or as a media source. *See* attached **Exhibit “D”** for TDOC Media Policy.
8. On April 5, 2024, Dr. Katie Spirko emailed former assistant district attorney Jennifer Nichols with the subject of “introduction” and with her signature stating she was “Katie Osborn Spirko, PsyD” and that she was a “forensic & clinical neuropsychologist”. *See* attached **Exhibit “E”** for email with former ADA Jennifer Nichols.
9. On April 8, 2024, Dr. Katie Spirko attempted to schedule another meeting with Inmate Autry at the federal holding facility in Memphis, Tennessee. She did this via an email on which Attorney McClendon was copied. *See* attached **Exhibit “F”** for Dr. Katie Spirko’s emails with federal facility. She inquired whether the prison had a notary on site or whether she should bring one along. It is the State’s belief that Ms. Spirko intended to obtain an affidavit from Inmate Autry casting doubt on his trial testimony. Prison officials declined her request to meet with Inmate Autry. Neither Inmate Autry’s attorney of record nor

Petitioner's attorney were copied on her email. Notably in these email exchanges, Dr. Katie Spirko held herself out to the federal facility to be "Katie Osborn Spirko, PsyD" and that she was a "forensic & clinical neuropsychologist". At no point during did this email exchange did Dr. Katie Spirko indicate to the federal facility that she was attempting to meet with Inmate Autry for media purposes.

10. On May 31, 2024, ABC News 20/20 aired an episode covering the Zach Adams case. Dr. Katie Spirko appeared on the episode and identified herself a forensic neuropsychologist that was hired by Attorney Bates to review the case materials and assess the truthfulness of witnesses. Dr. Katie Spirko also indicated in this 20/20 broadcast that she works directly for the Petitioner's mother Cindy Adams, not Attorney Bates.
11. At no time prior to the filing of Dr. Katie Spirko's *Motion to Quash* has she represented to this Court that she is a member of the media. Upon information and belief, Dr. Katie Spirko has never filed a request with this Court under Tenn. R. Sup. Ct., 30 for media access.
12. Petitioner Adams has relied upon by Dr. Katie Spirko's work, opinions and conclusions through his pleadings with this Court. Dr. Katie Spirko cannot now claim that she is a member of the news media, and invoke the privileges afforded to the news media under T.C.A § 24-1-208.
13. Furthermore, Dr. Katie Spirko's *Motion to Quash* contains broad, conclusory statements contending that Dr. Katie Spirko qualifies for the news media privilege under T.C.A § 24-1-208. Absolutely no details have been set forth by Dr. Katie Spirko explaining how she is (1) a person engaged in gathering information for publication or broadcast connected with; (2) employed by the news media or press, or (3) independently engaged in gathering information for publication or broadcast.

14. Dr. Katie Spirko's assertions in her *Motion to Quash* that she is a member of the news media directly contradicts her numerous representations to this Court, Tennessee Department of Corrections, and the federal holding facility that she acting in the role of a licensed neuropsychologist.

15. Alternatively, in the event this Court determines that Dr. Katie Spirko did qualify under media privilege under T.C.A. § 24-1-208, the State would submit that Dr. Katie Spirko should be divested of same privilege. The State would show at a hearing that (A) there is probable cause to believe that Dr. Katie Spirko's information which is clearly relevant to a specific probable violation of law; (B) the State will demonstrate that the information sought cannot reasonably be obtained by alternative means; and (C) the State will demonstrate a compelling and overriding public interest of the people of the state of Tennessee in the information.

II. Dr. Katie Spirko is not a private detective or investigator as contemplated by T.C.A. § 24-1-209. Alternatively, any such privilege was waived by Petitioner Adams by Dr. Katie Spirko filing her sworn affidavit and/or releasing recordings of her work to the media and/or by allowing Dr. Spirko to disseminate video recordings to the media.

16. T.C.A. § 24-1-209 states that "communications between an attorney and a private detective or investigator hired by such attorney, while acting in their respective capacities shall be privileged communications." Tenn. Code Ann. § 24-1-209.

17. Again, Dr. Katie Spirko has represented herself to this Court as a licensed neuropsychologist and she has offered her professional opinion in this post-conviction matter concerning witnesses and evidence. Petitioner Adams's post-conviction pleadings are replete with references to the work and opinions of Dr. Katie Spirko, and Dr. Katie Spirko's sworn affidavit contains numerous mentions of her work and opinions.

18. Alternatively, if any such privilege under T.C.A § 24-1-209 existed, Petitioner Adams waived this privilege by sharing with the State the affidavit from Dr. Katie Spirko containing (set forth all information at issue) and by citing Dr. Katie Spirko's work in his claims for post-conviction relief. Petitioner Adams cannot now raise a claim of investigative privilege when Petitioner Adams voluntarily provided the State with Dr. Katie Spirko's affidavit and incorporated the facts set forth in same affidavit into his pleadings.
19. Furthermore, the State would submit that Petitioner Adams waived this privilege by allowing Dr. Katie Spirko to record video interviews of Petitioner Adams and then disseminate the same to the media.

WHEREFORE, PREMISES CONSIDERED, the State of Tennessee would respectfully request that this Honorable Court:

1. Deny Dr. Katie Spirko's *Motion to Quash the Subpoena Duces Tecum*;
2. For any general or specific relief that the State of Tennessee is entitled to.

Respectfully Submitted:

/s/ Amy P. Weirich /

Amy P. Weirich, BPR (#014441)
Special Counsel
25th Judicial District
P.O. Box 38
Somerville, Tennessee 38068
(901) 465-7351
apweirich@tndagc.org

/s/ Christopher V. Boiano /

Christopher V. Boiano, BPR (#030076)
Assistant Attorney General
18th Judicial District
113 West Main Street
Cordell Hull Building, 3rd Floor.
Gallatin, Tennessee 37066
(615) 451-5810
cvboiano@tndagc.org

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been emailed and mailed to Douglas Bates IV and Crystal Etue, attorneys for Petitioner Adams, on this 7th day of March, 2025.

Douglas Thompson Bates, IV
Bates & Bates Law Office
406 W. Public Sq., 2nd Floor,
Bates Building
P.O. Box 1
Centerville, TN 37033
dtbates4@bates.law

Crystal M. Etue
Attorney at Law
219 3rd Ave N.
Franklin, TN 37064
Phone: 615-721-7983
Email: crystal@etuelaw.com
www.etuelaw.com

/s/ Christopher V. Boiano /

Christopher V. Boiano

Exhibit A

Littlefield, Jamie (USMS)

From: Clear, Deryl <Deryl.Clear@shelbycountyttn.gov> on behalf of Visitation Office
<visitation.office@shelbycountyttn.gov>
Sent: Friday, March 7, 2025 1:17 PM
To: Littlefield, Jamie (USMS)
Cc: Visitation Office
Subject: [EXTERNAL] FW: Neuropsychologist Visitation

From: Bates Paralegal <paralegal@bates.law>
Sent: Friday, December 15, 2023 1:07 PM
To: Visitation Office <visitation.office@shelbycountyttn.gov>
Subject: Neuropsychologist Visitation

[This EMAIL was not sent from a Shelby County Government email address. Please use caution.]
Good afternoon,

Thank you for speaking with me previously over the phone regarding this visitation.

1. Dr. Katie Spirko / Forensic & Clinical Neuropsychologist / [REDACTED]
2. Business name: FACTS (Forensic Assessment & Clinical Therapeutic Services) www.facts.care 2200 21st Avenue South, Suite 401 Nashville, TN, Tel: 402-680-4229
3. Inmate: Jason Autry
4. Visitation request: December 22nd, 2023, from 10:00 a.m. – 1:00 p.m.
5. [REDACTED]
6. Dr. Spirko would need to be in a non-recorded interview room (Attorney visitation room) and would request to bring in her laptop and a electronic device for transcribing purposes.

Thank you,

Savannah Shaffer

Paralegal to Douglas T. Bates, IV
P.O. Box 1 / 406 W. Public Square, 2nd Floor
Centerville, TN 37033
Direct Tel: (931)-729-9440
Office Tel: (931)-729-4085
Fax: (931)-729-9888

Exhibit B

Littlefield, Jamie (USMS)

From: Clear, Deryl <Deryl.Clear@shelbycountyttn.gov> on behalf of Visitation Office
<visitation.office@shelbycountyttn.gov>
Sent: Friday, March 7, 2025 1:17 PM
To: Littlefield, Jamie (USMS)
Cc: Visitation Office
Subject: [EXTERNAL] FW: Neuropsychologist Visitation

From: Bates Paralegal <paralegal@bates.law>
Sent: Monday, December 18, 2023 8:10 AM
To: Visitation Office <visitation.office@shelbycountyttn.gov>
Subject: RE: Neuropsychologist Visitation

[This EMAIL was not sent from a Shelby County Government email address. Please use caution.]
Good morning,

Dr. Katie Spirko just advised that she will also be bringing her assistant. Assistant information is below:

1. Nicole D Santa Lucia Weiser / D.O.B. [REDACTED]
2. Business name: FACTS (Forensic Assessment & Clinical Therapeutic Services) www.facts.care 2200 21st Avenue South, Suite 401 Nashville, TN, Tel: 402-680-4229
3. Inmate: Jason Autry
4. Visitation request: December 22nd, 2023, from 10:00 a.m. – 1:00 p.m.
5. [REDACTED]

Thank you,

Savannah Shaffer

Paralegal to Douglas T. Bates, IV
P.O. Box 1 / 406 W. Public Square, 2nd Floor
Centerville, TN 37033
Direct Tel: (931)-729-9440
Office Tel: (931)-729-4085
Fax: (931)-729-9888

From: Bates Paralegal <paralegal@bates.law>
Sent: Friday, December 15, 2023 1:07 PM
To: 'visitation.office@shelbycountyttn.gov' <visitation.office@shelbycountyttn.gov>
Subject: Neuropsychologist Visitation

Good afternoon,

Thank you for speaking with me previously over the phone regarding this visitation.

1. Dr. Katie Spirko / Forensic & Clinical Neuropsychologist / D.O.B. [REDACTED]
2. Business name: FACTS (Forensic Assessment & Clinical Therapeutic Services) www.facts.care 2200 21st Avenue South, Suite 401 Nashville, TN, Tel: 402-680-4229
3. Inmate: Jason Autry

4. Visitation request: December 22nd, 2023, from 10:00 a.m. – 1:00 p.m.
5. DL #: [REDACTED]
6. Dr. Spirko would need to be in a non-recorded interview room (Attorney visitation room) and would request to bring in her laptop and a electronic device for transcribing purposes.

Thank you,

Savannah Shaffer

Paralegal to Douglas T. Bates, IV

P.O. Box 1 / 406 W. Public Square, 2nd Floor

Centerville, TN 37033

Direct Tel: (931)-729-9440

Office Tel: (931)-729-4085

Fax: (931)-729-9888

Exhibit C

Misty Wright

From: Katie Spirko <katie.spirko@facts.care>
Sent: Monday, April 1, 2024 2:32 PM
To: Misty Wright
Cc: Dana@danamclendonlaw.com
Subject: [EXTERNAL] Inmate Zoom meeting request

*** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. ***

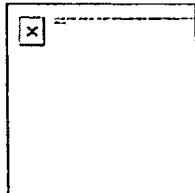
Hi Misty,

I am writing to request your assistance in setting up a nonrecorded virtual/videoconference meeting with inmate Zachary Adams (#426285) for this Friday, April 5th (anytime should work). If Friday is not possible for any reason, I could do Thursday, April 4th, at or after 2pm, as an alternate.

HU-15/23

The meeting will be with myself, Dr. Katie Spirko, through attorney Dana McLendon (cc'd). I believe you should already have my driver's license on file, but I'm happy to re-send it if needed. Please let me know if you require anything further to arrange this meeting, and thank you so much for the assistance.

Sincerely,




Katie Osborn Spirko, PsyD


Forensic & Clinical Neuropsychologist

FACTS

Family Support and Conflict Resolution Services

 katie.spirko@facts.care

 615-961-2349

 402-680-4229

 2200 21st Ave. S., Suite 401, Nashville, TN 37212

 facts.care



Exhibit D



ADMINISTRATIVE POLICIES
AND PROCEDURES
State of Tennessee
Department of Correction

Index #: 103.04

Page 1 of 6

Effective Date: November 15, 2019

Distribution: A

Supersedes: 103.04 (11/15/16)

Approved by: Tony Parker

Subject: PROVISION OF INFORMATION AND ACCESS TO THE MEDIA AND PUBLIC

- I. AUTHORITY: TCA 4-3-603, TCA 4-3-606, and TCA 10-7-503.
- II. PURPOSE: To establish guidelines for the provision of information to the public and regulate staff and offender contacts with the media.
- III. APPLICATION: All Tennessee Department of Correction (TDOC) employees, offenders, and privately managed institutions.
- IV. DEFINITIONS:
 - A. Communications Director: The departmental spokesperson, designated by the Commissioner, whose role is to coordinate the dissemination of information and statements concerning the Department.
 - B. News Media: Tennessee-based news publications, accredited news services such as the Associated Press, licensed radio and television broadcast stations or networks, and government franchised community cable television systems that originate scheduled news programming. This includes newspapers and magazines, published at least weekly or monthly and containing news and feature articles appealing to a broad spectrum of interest. News media excludes broadcast programs syndicated by independent producers, or television stations or networks for the primary purpose of entertainment, and syndicated television broadcast talk shows.
 - C. Public Information Officer (PIO): Individuals designated by the Communications Director to assist him/her in facilitating media requests within each region for information and interviews and departmental communications.
- V. POLICY: The TDOC, as a public agency, shall manage contacts with the public and media, including internet web site content and social media sites through the Communications Director to ensure accurate dissemination of information and appropriate access to the institutions and offices without disruption to security or operational routines.
- VI. PROCEDURES:
 - A. Departmental Contacts:
 1. When any TDOC employee is contacted by a media source, the appropriate PIO/Warden/Superintendent or Director will contact the departmental Communications Director, or designee. In the event the Communications Director or designee is not available, the appropriate Deputy/Assistant Commissioner will be contacted.

Subject: PROVISION OF INFORMATION AND ACCESS TO THE MEDIA AND PUBLIC

2. After consultation with the Communications Director/Designee and/or the Deputy/Assistant Commissioner, the Warden, Superintendent, Director, or liaison may respond to the media or schedule interviews with news media as governed by the guidelines provided in this policy.

B. General Guidelines:

1. The facility will be accessible to news media representatives, with the exception of those areas determined by the Warden/Superintendent to be inappropriate for confidentiality or security reasons, such as the armory, shower areas, individual cells, segregation areas, and clinic examination areas.
2. Groups of inmates will not be filmed or photographed if individual inmates can be readily identified, unless the TDOC Release and Permission for Interview/Photograph/Recording, CR-0555, is obtained from each inmate.
3. Any interview or visit by the news media may be denied, suspended, or terminated during the implementation of an emergency operation plan or under any other circumstances that pose a threat to the continued safety of persons and/or security of the facility or office.
4. The Communications Director or designee will answer media inquiries involving departmental policy development and departmental data.
5. The Communications Director should handle all contact with out-of-state, national, or international media. The Communications Director may authorize Wardens/Superintendents, Directors, or institutional liaisons to make follow up contacts with media for specific projects, events, or stories.
6. The Communications Director will verify the credentials of out-of-state, national, or international media. Access to the institutions will be allowed only with the specific authorization of the Commissioner.
7. News media wanting to videotape or photograph exteriors of a facility will be allowed to do so, provided that it does not disrupt normal business. Members of the media must notify the Communications Director and/or the Warden/Superintendent prior to their arrival at the facility and should remain in the parking lot. In the event that the Communications Director is not available, the Warden/Superintendent of the facility or a designee must be notified. Any video obtained from the parking lot shall not include inmates.
8. News media are not permitted to conduct interviews during videoconference meetings between attorneys and their clients
9. Live broadcasts (television, radio, telephone, or other electronic or communicative method) from inside the perimeter of an institution are not permitted without prior written authorization from the Commissioner or his designee.

- C. Interviews-Incarcerated Offender: News media interviews with offenders may be permitted and subject to, but not limited to, the following restrictions:

Subject: PROVISION OF INFORMATION AND ACCESS TO THE MEDIA AND PUBLIC

1. Except as provided in subsection (2) below, face to face news media interviews with offenders are not permitted. Telephone interviews with media on institutional phone lines will not be permitted. Inmates who wish to place the names and numbers of individual media representatives on their ITS calling lists may do so in accordance with Policy #503.08. Inmates may correspond in writing with media representatives in accordance with Policy #507.02.
 2. News media members may request an interview with an unspecified inmate on a specific department program or topic. If deemed appropriate the Communications Director or designee will attempt to provide inmates appropriate for interview on such programs or topics. The approved inmate must complete the TDOC Release and Permission for Interview/Photograph/Recording, CR-0555, prior to the interview.
 3. The Communications Director shall notify the Director of Victim Services of a potential media interview so that the appropriate victims/victim witness coordinator can be notified.
- D. Release of Information - Offender: The Communications Director shall be notified of any request by the media for offender information. The Communications Director, Warden, Superintendent, Director, or designee shall release information about incidents as outlined in Policy #103.02. Information that may be released:
1. Name
 2. Age
 3. Race
 4. Conviction and sentencing data (includes offenses if conviction has occurred)
 5. General institutional assignments
 6. Identification picture (to be copied or photographed, not furnished)
 7. Selected information on specific inmates may be made available to the general public on an individual basis.
 8. Probation/Parole status and supervision
- E. Interviews - Staff: Personal interviews with staff members are subject to the following restrictions:
1. Interviews are voluntary.
 2. Approval must be obtained in advance from the Warden/Superintendent/Director for any interview regarding the TDOC. This includes interviews conducted during the employee's working hours, after working hours, both on and off state property. The Communications Director or appropriate Deputy/Assistant Commissioner will be notified in advance of date and time of interview.
- F. Incidents
1. After the reporting requirements of Policy #103.02 have been satisfied, all incidents of media significance (particularly Class A and B incidents) are to be reported to the Communications Director by the Assistant Commissioners of Prisons or Operational Support or a designee. Notification should be made without delay.

Subject: PROVISION OF INFORMATION AND ACCESS TO THE MEDIA AND PUBLIC

2. The Communications Director shall be notified of all incidents of media significance via his/her assigned cellular phone, e-mail, and/or home telephone.
3. It is the Communication Director's responsibility to return calls and messages within seven business days.
4. The Communications Director shall be given all essential information pertinent to the circumstances of the incident and persons involved in order to respond to media inquiries.
5. After a report is given, the Communications Director, in consultation with the Commissioner, will determine where media inquiries are to be directed for the particular incident.
6. Releases to the media will be in a timely manner and prepared and distributed by the Communications Director for incidents relating to high-risk escapes or incidents that could jeopardize public safety. All other releases will be issued on a case-by-case basis at the discretion of the Commissioner and the Communications Director. At privately managed facilities, these activities shall be conducted by the private contractor's Communications Officer(s) only after approval by the TDOC Communications Director.

G. Public Information/Other Events/Internet Web Site Content

1. The TDOC annual report will be made available to the media and the general public. Additional information regarding the Department and its operations, such as statistical reports and inspection results, may be forwarded to the media and the general public upon request. All institutional contingency and transportation plans shall be treated as confidential and shall not be open for inspection by members of the media and public.
2. Wardens/Superintendents/Directors/liaisons may contact local media to cover a specific event or meeting (such as a fund-raising event) with the Communications Director's approval. Within one work day after the event or meeting, the Warden/Superintendent or designee will report to the Communications Director about the coverage of the event/incident.
3. No facility or division is to issue a written press release to the news media. Upon approval and review by the Communications Director, a facility or division drafted press release shall be issued by the Communications Director or his/her designee from Central Office.
4. All TDOC web site format and content should be reviewed by the Communications Director prior to going on-line. This includes any new web pages as well as revisions/updates to existing pages, excluding those updates provided by Decision Support: Research and Planning. All questions addressed to the departmental Webmaster should be answered by the Communications Director or a designee in a timely manner (two business days). The Communications Director or web developer shall ensure that all web site content meets the state standard established for internet publication.

H. Parole Hearings:

1. Media shall have access to parole hearings in accordance with Policy #103.03.

Subject: PROVISION OF INFORMATION AND ACCESS TO THE MEDIA AND PUBLIC

2. The Warden/Superintendent/District Director or designee shall confer with the parole board members on-site before admitting the media to a parole hearing.
 3. Media shall be escorted to and from parole hearings by institutional staff.
 4. Because parole hearings are considered an open court proceeding, inmates who appear can be videotaped, photographed or recorded without signing a consent form. The general provisions of this policy should still apply to interviews before or after the hearing. No interviews shall be conducted outside the hearing without the inmate's written permission.
- I. Tours: TDOC frequently offers tours of correctional facilities to various groups and organizations in accordance with guidelines established by each facility. Juveniles who are under the jurisdiction of a juvenile justice system will not be allowed to tour.
- VII. ACA STANDARDS: 2-CO-1A-30, 4-4021, 4-APPFS-1C-01, and 2-CO-1A-27.
- VIII. EXPIRATION DATE: November 15, 2022.



**TENNESSEE DEPARTMENT OF CORRECTION
RELEASE AND PERMISSION FOR INTERVIEW/PHOTOGRAPH/RECORDING**

I, _____, hereby grant
_____ permission to

☐ Interview

☐ Photograph

☐ Record Me

with regard to the following subject matter: _____

I grant this permission freely and voluntarily, and I fully understand that I have the right to decline to be interviewed, recorded, or photographed. I fully understand that anything I say during the interview may be used against me in a court of law at any time. **I also fully understand that the Tennessee Department of Correction is not a party to and will not be held responsible for enforcing any agreement between the inmate and the interviewer regarding privacy.** Finally, I reserve the right to end the interview at any time.

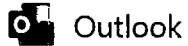
Offender Name

TDOC ID

Date

Witness

Exhibit E



Fwd: introduction

From Jennifer S. Nichols <jsnichols@tndagc.org>
Date Fri 4/5/2024 1:10 PM
To Christopher V. Boiano <cvboiano@tndagc.org>

FYI

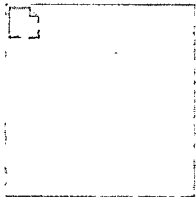
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From: Katie Spirko <katie.spirko@facts.care>
Sent: Friday, April 5, 2024 1:07:36 PM
To: Jennifer S. Nichols <jsnichols@tndagc.org>
Cc: Dana McLendon <dana@danamclendonlaw.com>
Subject: introduction

Good Afternoon, Ms. Nichols,

I believe my name has come up in connection with Zach Adams's recent filings. I wanted to reach out directly to make sure you have my direct contact, as well as that of my attorney (cc'd) in case you would like to speak with me. Please do not hesitate to reach out at any point. If it would be helpful to you, I am happy to come meet with you in person.

Thank you,



Katie Osborn Spirko, PsyD
Forensic & Clinical Neuropsychologist
FACTS
Family Support and Conflict Resolution Services

✉ katie.spirko@facts.care
☎ 615-961-2349
📠 402-680-4229
📍 2200 21st Ave. S., Suite 401, Nashville, TN 37212
🌐 facts.care



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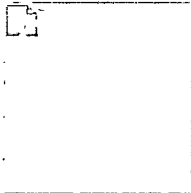
Exhibit F

From: Clear, Deryl <Deryl.Clear@shelbycountyttn.gov> On Behalf Of Visitation Office
Sent: Monday, April 8, 2024 12:53 PM
To: 'Katie Spirko' <katie.spirko@facts.care>; Visitation Office <visitation.office@shelbycountyttn.gov>
Cc: Dana McLendon <dana@danamclendonlaw.com>
Subject: RE: Inmate visitation question

We have a notary on staff. Please give us 48-72 hours and I will respond to this email. Thanks.

From: Katie Spirko <katie.spirko@facts.care>
Sent: Monday, April 8, 2024 12:41 PM
To: Visitation Office <visitation.office@shelbycountyttn.gov>
Cc: Dana McLendon <dana@danamclendonlaw.com>
Subject: Re: Inmate visitation question

Jason Autry



Katie Osborn Spirko, PsyD
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FACTS
Family Support and Conflict Resolution Services

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On Apr 8, 2024, at 12:26 PM, Visitation Office <visitation.office@shelbycountyttn.gov> wrote:

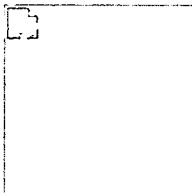
What is the name of the inmate?

From: Katie Spirko <katie.spirko@facts.care>
Sent: Monday, April 8, 2024 11:26 AM
To: Visitation Office <visitation.office@shelbycountyttn.gov>
Cc: Dana McLendon <dana@danamclendonlaw.com>
Subject: Inmate visitation question

Good Morning,

I am needing to set up a visitation with an inmate at the Shelby County Penal farm, and I am wondering whether you have a notary service available at the facility or if I would need to bring someone with me to the visit. I am hoping to be able to schedule the visit for this Wednesday at noon, in case that makes a difference.

Thank you,



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