

**IN THE COURT OF COMMON PLEAS
OF PHILADELPHIA COUNTY, PENNSYLVANIA**

COMMONWEALTH OF PENNSYLVANIA,

Respondent,

v.

SAHARRIS ROLLINS,

Petitioner.

NOS. 585-588

April Term, 1986

**DECLARATION OF BONNIE FRANK CARTER, Ph. D., PURSUANT
TO 28 U.S.C. SECTION 1746 AND 18 PA. C .S. SECTION 4904**

I, Bonnie Frank Carter, Ph.D., affirm, declare and state as follow:

1. I am a licensed psychologist in the Commonwealth of Pennsylvania. I have been in practice for fifteen years. For the past eight years, I have worked with perpetrators and victims of physical violence. My work includes clinical intervention and research. For additional background information, please refer to my curriculum vitae.

2. I examined, tested and conducted a clinical interview of Saharris Rollins on three separate dates - October 1, October 4 and October 5, 1996. Mr. Rollins was cooperative and responsive throughout. He was forthright and answered all my questions to the very best of his ability. There were no indications of malingering or "faking".

3. My clinical interview with Mr. Rollins covered the following areas: family, activities and events during childhood and adolescence, significant losses and other traumata, significant relationships, other associates and friends, adjustment to prison and capacity for rehabilitation, and handedness.

4. Saharris was born on Okinawa Air Force Base (AFB) in Japan. He is the second

oldest of four children. Saharris' father was in the active duty military for twenty years and retired in the rank of Master Sergeant from the United States Air Force. He is described as a very large man, weighing 350 pounds. Saharris' father was African-American and his mother was Japanese. She is described as tiny and approximately 5' 0" tall. Saharris had two brothers and one sister. The oldest child, Yasmin, was also born on Okinawa AFB. The third child, Mioshi, was born in Chicago and the fourth child Tommy was born in 1965.

5. Saharris is the father of four children. His youngest child is his daughter, Sahara Tioshi Rollins. Sahara lives with her grandmother, Naomi Collins. The second youngest child is his daughter, Kenuway Yameesha Jones. Kenuway lives with her mother and Saharris' wife, Angela Rollins. The next child, the second oldest, is his son, Khaliq Alim Fields, who lives in California. The oldest child is his daughter, Nikia Waugh Rouse. Nikia lives with her grandmother, Marie Waugh Ballard.

6. Saharris grew up in a home with a very abusive father. The mistreatment he received was severe. Saharris also recalls the abuse that his mother received. Saharris' father would physically beat and abuse the entire family, including their mother on many occasions.

7. Saharris' mother finally left his father after many years of abuse. The mother took the youngest son and the oldest daughter with her when she left. She promised Saharris that she would come back for him and his other brother once she got on her feet but she never did. Saharris continued to live with his abusive father.

8. Besides the beating and the abuse in the home, Saharris grew up in poverty. Despite his father's skills as a metallurgist, skills that his father learned while in the Air Force, he did not adequately feed and clothe the family. The family lived on public assistance and Saharris' mother would mend and make do with whatever handouts and clothing were given to

the family. Saharris reached the tenth grade in school. He left school so that he could help the family with income. He took on various jobs.

9. When Saharris was growing up, there was a lot of gang activity in the neighborhood. Saharris was not involved with gangs but he was picked on by gang members. It was very hard to avoid gangs in the neighborhoods where Saharris grew up. It was common for gang members to stop boys in the neighborhood and ask about gang affiliation. If a boy gave the wrong answer, no answer or a street address considered to be in another gang's territory, then that boy would get beaten by the gang members that stopped him.

10. Saharris has suffered many tragic losses in his life. One of the first significant losses was the accidental drowning death of his brother, Tommy. Tommy was living with his mother and sister in Reading, Pennsylvania at the time of the incident. Tommy's death devastated Saharris and the entire family. A few years after Tommy's death, Saharris' mother died of cancer. Her death affected him deeply. The next person to die in Saharris' family was his brother, Mioshi. Mioshi was shot and killed two years after the mother died. Saharris took Mioshi's death extremely hard. After Mioshi's death, Saharris became obsessed with finding Mioshi's killer. Friends and family were worried about Saharris because he began to act strangely. Saharris began to dress all in black and took little care of himself and his basic physical needs, i.e., sleep, food. Saharris' father also died, a couple years after Mioshi, from high blood pressure and not taking care of himself.

11. Saharris has had at least three significant head injuries. The first occurred when he was about 10 or 11 years old. A neighborhood bully picked up Saharris by his feet, swung him around, and flung him head first into a wall. Saharris lost his two front teeth from the impact. Saharris also sustained head injuries on two other occasions while riding his minibike.

One accident occurred when Saharris was about 15 years old. He was hit by a car while he was riding his minibike and sustained head injuries along with other injuries. Saharris was involved in a second minibike accident when his brakes failed on a wet road and he crashed into a house.

12. Saharris has shown great ability to adjust to prison and has a capacity for rehabilitation. When he was first incarcerated and waiting trial, Saharris kept peace on the cellblock and repaired a ping-pong table for use by the inmates.

13. I had the opportunity to observe Saharris interacting in a contact visit with two of his children, Kenuway and Sahara, while he was temporarily housed at Curran-Fromhold Correctional Facility on October 4, 1996. Kenuway is named for Saharris' mother, who spelled her name Kinue; while Sahara Tioshi is named for Saharris and his two dead brothers, Tommy and Micshi. Saharris interacted appropriately with them and demonstrated good parenting abilities. He empathized with them, allowed them to cry, spoke of using positive discipline, reminisced about them and about his own mistakes, and in general provided them with very positive interaction from their father. He is an important person in their lives and provides significant emotional support to them and to his other daughter Nikia and her grandmother Marie Ballard.

14. Saharris is right-handed and testing indicates that he shows a strong preference in using the right hand. One test of Saharris' handedness involved dropping an object on the floor and allowing him to pick it up. The object was on Saharris' left side but he did not use his left hand; instead, he reached his right arm and hand over his body to pick up the object with his right hand. Another test was the Block Design subtest of the Wechsler Adult Intelligence Test. As Saharris performed the task, I carefully observed what hand he used to complete the task. The test is structured so participants do not know they also are being tested for hand bias. Mr.

Rollins chiefly used his right hand to complete the task and used his left hand only to do the most simple designs. For the last three designs which are the most difficult, Saharris used exclusively his right hand. I also conducted other hand testing on Mr. Rollins, specifically name-writing, MacQuarrie Dotting and a written version of a scissor cutting task. On all tests, Mr. Rollins showed a very strong right hand dominance with only very minimal competence in his left hand motor skills.

15. I hereby certify that the facts set forth above are true and correct to the best of my personal knowledge, information and belief, subject to 28 U.S.C. § 1746 and 18 Pa. C.S. § 4904.

Bonnie Frank Carter, Ph.D.
Bonnie Frank Carter, Ph.D.

12/10/96
Date