



Henry Napue's Legacy

On February 25, the United States Supreme Court vacated Richard Glossip's conviction for capital murder in the 1997 death of a hotel owner in Oklahoma City, Oklahoma.

The state's principal witness against Glossip was his co-defendant, Justin Sneed. During his testimony, Sneed said that he had taken Lithium but had somehow never seen a psychiatrist. In Glossip's appeals, his attorneys argued that not only was Sneed's testimony false, but that the prosecutor knew it was false and didn't correct the record.

This is called a *Napue* violation, based on the Supreme Court's 1959 ruling in *Napue v. Illinois*, which said that the knowing use of false testimony by a prosecutor violates the due process clause of the Fourteenth Amendment.

It's easy to forget that there are actual people behind the shorthand used to identify these important legal precedents. For example, *Brady* violations, based on the government's failure to disclose exculpatory evidence, are named for John Brady of Maryland. Henry Alford's appeals gave rise to the *Alford* plea, which enables a defendant to enter a guilty plea while still maintaining his innocence. Neither man had his conviction vacated.

Henry Napue was exonerated in 1960, 20 years after he was convicted of murder in the shooting death of a police officer in Chicago, Illinois. The state's case hinged on a witness who testified falsely that he had not been promised any benefits in exchange for his testimony. Writing for the Supreme Court, Chief Justice Earl Warren wrote: "Our own evaluation of the record here compels us to hold that the false testimony used by the State in securing the conviction of petitioner may have had an effect on the outcome of the trial."

Napue's case is in our <u>pre-1989 Registry</u>. It is currently an independent database on our website, but it will be combined into our main database on our new website, which launches in the coming weeks. This database is filled with important cases, including the exoneration of <u>Clarence Gideon</u>, whose successful appeal in 1963 in Gideon v. Wainwright established a defendant's right to an attorney, even if they were unable to afford one.

The 462 cases in this part of the Registry are a stark reminder that the fight to undo wrongful convictions started long before the DNA era.

We also published eight exonerations in February.

In 2009, <u>Charlotte Pleytez</u> and <u>Lombardo Palacios</u> were convicted of first-degree murder in Los Angeles, California. They were exonerated in 2024 after a reinvestigation identified the real perpetrators and concluded that three eyewitnesses had mistakenly identified Pleytez and Palacios.

In 2023, Richard Escamilla was sentenced to three years in prison for three drug crimes, one of which the prosecution agreed was committed by someone else, in Dallas, Texas. He was exonerated in 2025 after the identity of the real perpetrator was discovered.

<u>Eron Shelman</u> was convicted in 1992 of a murder in Detroit, Michigan. He was exonerated in 2025, after uncovering new evidence that impeached the credibility of the state's main witness.

In 2024, 16-year-old <u>Martel Lee</u> was convicted of sexually assaulting a classmate at school in Kenosha, Wisconsin. He was exonerated after a new witness said the complainant was never in the same classroom with Lee as the complainant claimed at trial.

Melissa Clark, of Houston, Texas, pled guilty to a drug offense in 2011. She was exonerated in 2025 after the officer involved in her arrest was tied to misconduct in other cases.

In 2023, <u>Keyiede McLean</u>'s sister, Kalonda McLean, was convicted of shoplifting after falsely claiming she was Keyiede in Arlington, Virginia. In 2025, Keyiede was exonerated following an investigation by the police and prosecution which revealed that Kalonda was the real perpetrator.

<u>Corey Gibbs</u> was convicted in 2013 of shooting two men to death in Philadelphia, Pennsylvania. He was exonerated in 2024, based on the disclosure that former Detective Philip Nordo, one of the detectives in his case, had engaged in a pattern of systemic and abusive witness tampering.

With your support, the National Registry of Exonerations can protect the innocent by preventing false convictions.

We find the stories. We painstakingly search for every false conviction in the United States that is overturned and meets our criteria for exoneration. We gather the information, study the cases, and code the data, fueling the most comprehensive public database of exonerations that exists.

We tell the stories. One by one, we write and share the human stories behind each individual exoneration. We bear witness to these incredible injustices to ensure that they are remembered.

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