

FALL 2021 IRA S. FLORY TRIAL COMPETITION



State of Louisiana vs. Conrad Grayson

*Problem by Prof. Jeffrey C. Brooks,
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**G.J. No. 15
GENERAL No. 14 CR 4583**

**Seventy-Seventh Judicial District Court of the State of Louisiana
January 22, 2015**

**THE PEOPLE OF THE STATE OF LOUISIANA
versus
CONRAD GRAYSON**

**GRAND JURY INDICTMENT FOR:
Solicitation for Murder**

**A TRUE BILL RETURNED BY:
Aiden Mathis
Foreperson to the Grand Jury**

Filed January 22, 2015
Satoshi Takeda, Deputy Clerk
Bail \$ 200,000

Arraignment Date: January 23, 2015

State of Louisiana

Parish of Flory

January Term 2015

Grand Jury of Flory Parish

SS 14 CR 4583

The Grand Jurors chosen, selected, and sworn in and for the Parish of Flory, in the State of Louisiana, in the name and by the authority of the People of the State of Louisiana, upon their oaths present that:

Count I

On or about November 26, 2014, at and within said Parish, CONRAD GRAYSON committed the offense of Solicitation for Murder, in that CONRAD GRAYSON, in violation of La. R.S. 14:28:1, solicited FRANKIE STEVENS to commit the murder of VICTORIA HARPER GRAYSON, in the township of Dune Harbor, Parish of Flory, State of Louisiana, contrary to the statutes, and against the peace and dignity of the same People of the State of Louisiana.

Aiden Mathis

Aiden Mathis
Foreperson to the Grand Jury

JURY INSTRUCTIONS²

Members of the jury:

INSTRUCTION – PRELIMINARY MATTERS

These comments are intended as a brief introduction to the trial of this case. This is a criminal case instituted by the State of Louisiana and presented by the district attorney. The case is based on an indictment which charges the defendant, Conrad Grayson, with the charge of solicitation to murder. The defendant has entered a plea of not guilty.

The trial will proceed in the following order:

First, the district attorney will make an opening statement. The defense counsel will then make an opening statement. The opening statements are not evidence but are an outline of what the lawyers contend will or will not be shown by the evidence.

Second, the state will introduce evidence intended to support the charge contained in the indictment.

Third, after the state has presented its evidence, the defendant will present evidence, but is not required to do so. The burden is always on the state to prove each element of the offense charged beyond a reasonable doubt. The defendant does not have the burden of calling any witnesses or of introducing any evidence.

Then, at the conclusion of the evidence, the district attorney and defense counsel have the opportunity to present oral arguments in support of their cases. The closing arguments present the contentions of each side as to what the evidence has shown and what inferences may be drawn. What the lawyers say in closing arguments is not evidence. The state has the right to argue both first and last.

In the opening statements the attorneys were permitted to tell you the facts they expected to prove. In closing arguments the attorneys were permitted to present for your consideration their contentions regarding what the evidence has shown or not shown and what conclusions they think may be drawn from the evidence. The opening statements and the closing arguments are not to be considered as evidence.

Finally, I will instruct you on the law applicable, and you will then retire to consider your verdict. As jurors, you are the judges of facts. It is your duty to consider and weigh the evidence and to decide all questions of fact based upon the evidence presented. You must rely upon your memory and may not take notes; so it is very important that you give this case your close attention.

INSTRUCTION – SOLICITATION FOR MURDER

² These jury instructions are excerpted and adapted from: Cheney Joseph & P. Raymond Lamonica, Louisiana Criminal Jury Instructions and Procedures Handbook (West 2018).

The defendant, Conrad Grayson, is charged with solicitation for the murder of Victoria Grayson. Solicitation for murder is the intentional solicitation by one person of another person to commit or cause to be committed a second degree murder. Second degree murder is the killing of a human being when the offender has a specific intent to kill or inflict great bodily harm.

Thus, in order to convict the defendant of solicitation for murder, you must find (1) that the defendant Conrad Grayson solicited another person to commit second degree murder of the victim, Victoria Grayson; and (2) that the defendant Conrad Grayson acted with the specific intent to kill Victoria Grayson.

INSTRUCTION – INTENT

Criminal intent may be specific or general. Specific criminal intent is that state of mind which exists when the circumstances indicate that the defendant actively desired the prescribed criminal consequences to follow his act or failure to act. General criminal intent is present when the circumstances indicate that the defendant must have adverted to the prescribed criminal consequences as reasonably certain to result from his act or failure to act. General criminal intent is always present when there is specific intent.

Whether criminal intent is present must be determined in light of ordinary experience. Intent is a question of fact which may be inferred from the circumstances. You may infer that the defendant intended the natural and probable consequences of his acts.

INSTRUCTION – BURDEN OF PROOF

The defendant is presumed to be innocent until each element of the crime necessary to constitute his guilt is proven beyond a reasonable doubt. The defendant is not required to prove that he is innocent. Thus, the defendant begins the trial with a clean slate.

The burden is upon the state to prove the defendant's guilt beyond a reasonable doubt. In considering the evidence, you must give the defendant the benefit of every reasonable doubt arising out of the evidence or out of the lack of evidence. If you are not convinced of the guilt of the defendant beyond a reasonable doubt, you must find him not guilty.

While the state must prove guilt beyond a reasonable doubt, it does not have to prove guilt beyond all possible doubt. Reasonable doubt is doubt based on reason and common sense and is present when, after you have carefully considered all the evidence, you cannot say that you are firmly convinced of the truth of the charge.

INSTRUCTION – DIRECT AND CIRCUMSTANTIAL EVIDENCE

Evidence is either direct or circumstantial. Direct evidence is evidence, which, if believed, proves a fact. Circumstantial or indirect evidence is evidence, which, if believed, proves a fact, and from that fact you may logically and reasonably conclude that another fact exists. You cannot find a

defendant guilty solely on circumstantial evidence unless the facts proven by the evidence exclude every reasonable hypothesis of innocence.

An indictment is only a written, formal accusation against a defendant charging him with a crime. You are not to consider the indictment as evidence against the defendant. You may not infer guilt from the mere filing of an indictment.

STIPULATIONS AND WITNESS LISTS

I. Procedural Matters:

1. Both parties are bound by these stipulations.
2. All Flory Trial Rules apply. The Louisiana Code of Evidence and the Louisiana Code of Criminal Procedure apply to this action.
3. Jurisdiction and venue are proper.
4. Witnesses, while testifying, may not “invent” an individual not mentioned in the facts and have testimony or evidence offered to the court or jury from that individual.
5. The four witness statements included in this file were given under oath and the witnesses have had an opportunity to review and correct those statements.
6. All documents and exhibits in the file are fair and accurate representations of the matters they purport to represent. If asked, all witnesses must admit that exhibits are fair and accurate representations of that which they purport to represent on the relevant dates. Each exhibit contained in the file is the original of that document unless explicitly otherwise established by the evidence. Proper chain of custody has been established for all exhibits.
7. The State and the defendant must each call the two witnesses listed on their respective witness lists below, but may call them in any order. No other witnesses may be called. Witnesses cannot be re-called.
8. All documents and exhibits in the file have been provided to both parties in advance of trial, and notice has been provided by both parties of their possible intent to use and/or introduce any and all documents in the case file.
9. The parties cannot request or refer to any jury instructions, verdict forms, or charges other than those appearing in the file’s “Jury Instructions” section, including any lesser included offenses or responsive verdicts. Both parties have consented to the jury instructions as written.
10. The parties have agreed to the below “housekeeping” matters. No additional housekeeping matters or motions may be raised pre-trial:
 - a. All witnesses other than the defendant have been sequestered, pursuant to La. Code Evid. Art. 615. The defendant shall be constructively seated at defense counsel’s table throughout the trial.
 - b. All exhibits have been pre-marked for identification, and counsel and the court shall use the pre-marked exhibit numbers.

- c. Counsel shall stand when making or opposing an objection.
 - d. Counsel have free use of the courtroom well while making openings and closings. Counsel must ask for permission to approach the jury, judge, any witness, or opposing counsel.
 - e. All sidebars shall be treated as constructive sidebars.
 - f. The prosecution has reserved any time remaining for a rebuttal closing, if they choose to offer a rebuttal closing.
11. The trial shall be held in the order set forth in the Flory Trial Rules. Neither party may defer, waive, or otherwise deviate from the order of the trial, and any and all provisions of the Louisiana Code of Criminal Procedure allowing for such deviations are nullified for purposes of this trial:
- a. Opening Statement for the Plaintiff/Prosecution,
 - b. Opening Statement for the Defense,
 - c. Examination of the Witnesses for the Plaintiff/Prosecution,
 - d. Mid-Trial Motions for the Defense, if any,
 - e. Examination of the Witnesses for the Defense,
 - f. Mid-Trial Motions for the Plaintiff/Prosecution, if any,
 - g. Closing Argument for the Plaintiff/Prosecution,
 - h. Closing Argument for the Defense, and
 - i. Rebuttal Closing Argument for the Plaintiff/Prosecution.

II. Substantive Matters

- a. This case comes to trial in 2021, following the consent of both parties to scheduling continuances caused in part due to the COVID-19 pandemic. The defense may not make a speedy trial motion.
- b. Conrad Grayson has entered a plea of not guilty and has requested a trial by jury.
- c. The trial court denied the motion to dismiss the indictment referenced in Lt. Porter's hearing transcript.
- d. All statements and exhibits in this file were timely provided to defense counsel consistent with the prosecution's *Brady* obligations, and proper and timely notice was given of any and all subpoenas noted in the case file.
- e. Frankie Stevens was evaluated by two independent medical doctors as well as a clinical psychologist pursuant to a court order issued by Judge Blackwell on March 12, 2015. Each of these three medical professionals issued reports in which they each opined that Frankie Stevens has been at all times free of mental disease or defects and was and is

competent to stand trial and/or testify truthfully. These reports were accepted by Judge Blackwell at Stevens' *Boykins* hearing, and Frankie Stevens was found to be competent to enter a plea.

- f. In conjunction with his plea agreement, Frankie Stevens allocuted in the 77th Judicial District Court on April 13, 2015; s/he then pled guilty to one count of second-degree murder, and was sentenced to life imprisonment at the Louisiana State Penitentiary in Angola. At his/her allocution, Frankie Stevens voluntarily gave a statement consistent in all respects with his/her prior statement to the police on November 30, 2014, and voluntarily and knowingly accepted all of the terms of the plea agreement included in the Exhibits section of this file.
- g. Dr. Michelle Banks, if called to testify, would testify under oath to the investigation, analysis, and conclusions as reported in Exhibit 2, and would offer no additional information.
- h. Lydia Davis gave birth to a healthy baby girl, Charlotte, on July 17, 2015.
- i. Michael Davis obtained a divorce decree pursuant to Louisiana Civil Code Article 103(2) on April 31, 2015.

III. Witness Lists (in no particular order):

Prosecution:

- a. Lt. Jack/Jackie Porter (who may be of any gender); and
- b. Frankie Stevens (who may be of any gender).

Defense:

- a. Lydia Davis (who may be played by a person of any gender, but shall be considered to be female for purposes of this case); and
- b. Conrad Grayson (who may be played by a person of any gender, but shall be considered to be male for purposes of this case).

Statement of Frankie Stevens

RE: Case 14-4583

STATEMENT OF FRANKIE STEVENS

Taken in Interrogation Room #3, Dune Harbor Police Headquarters, Dune Harbor, Louisiana, November 30, 2014, commencing at 8:17 AM.

PRESENT: Tom Kingsley
Assistant District Attorney, Flory Parish, Louisiana

Detective Jack/Jackie Porter
Badge No. 17

Frankie Stevens

Ashley Davenport
Assistant Public Defender

Dune Harbor Police Department

1 ADA Kingsley: We are now recording. Okay. Today is November thirtieth.
2 We are in Interrogation Room Number 1, Dune Harbor Police Headquarters.
3 Present are Frankie Stevens, Detective Jack/Jackie Porter, Public
4 Defender Davenport, and myself, Assistant District Attorney Tom
5 Kingsley.

6 Q. (Kingsley) Frankie, you understand that you are here because you have
7 been arrested for the murder of Victoria Grayson, correct?

8 A. (Stevens) Yes.

9 Q. And you and your attorney have been informed of all of your rights,
10 and you have read, reviewed, and signed this Miranda waiver form,
11 correct?

12 A. Yes.

13 Q. And you are speaking with us today because you want to give a free
14 and full confession, is that correct?

15 A. Yeah, but only if you give me that deal that you promised me.
16 Otherwise I'm not saying anything.

17 [Ms. Davenport] Frankie, we've already looked over the plea agreement,
18 and it looks good.

19 A. OK then. Let's get this over with, I'm ready to be done.

Statement of Frankie Stevens

1 Q. Right. So, let's start at the beginning. How do you know Conrad and
2 Victoria Grayson?

3 A. Well, I don't, really. I have done some landscaping work for them in
4 the past. That's what I do, I own my own landscaping and design company,
5 Stevens Landscaping Designs. I did the Graysons' front walkway redesign
6 like two years ago, and I had been working with them on a big redesign
7 of their pool area. It's just kind of boring and I guess that she wanted
8 to spruce things up a bit. Conrad really liked to throw her money
9 around, you know.

10 Q. Who contacted you about this pool redesign?

11 A. Conrad did. He called me in mid-October and I came over and looked
12 at the property. Victoria was there at that point too, and I could tell
13 that she was just not at all on board with his ideas. She actually told
14 him that it was idiotic and a waste of money. He shot back that it was
15 just money and that he deserved to live in a place that was worth
16 something. So yeah, I quoted them fifteen grand for the pool job, and
17 Victoria said, kind of grudgingly, that that would work for her. I
18 started work on it in November, but I honestly didn't get too far along
19 on it because they kept needing to use the pool area for parties and
20 things. Pretty much all I did was bring over my tools and some building
21 supplies.

22 Q. So, let's fast forward to November twenty-sixth. How is it that you
23 came to be at the Grayson residence?

24 A. Well, see, I actually got some texts from Conrad that morning. I
25 guess he and Victoria had had a huge fight over something, he didn't say
26 what, and she was throwing him out of the house. I was planning to meet
27 with him to give a final estimate on a new job he was thinking about,
28 something about a pool house. But he texts me and says that everything's
29 off. Well, that really pissed me off, you know? I had been planning on
30 that gig and I had turned down some other jobs and stuff because I was
31 counting on it, it was big money, you know? So I figured I'd see if
32 maybe I could salvage the situation. I mean, everyone in town knows
33 that Victoria is the one with all the money. Conrad was pretty much
34 just a trophy husband, everyone knows that. He has all these big ideas
35 about startup companies and turning Dune Harbor into the next Silicon

Statement of Frankie Stevens

1 Valley, but he's all talk. So anyway, I texted him to see if maybe
2 there was a way to get the job back on track, maybe he could work it out
3 with Victoria, you know? And so then Conrad brings up, well, if she
4 wasn't around anymore, you know, then the money could flow. And I guess
5 that meant that if Victoria was out of the picture, like a divorce or
6 something, then he'd have control of the money. Then all of the sudden
7 I get a call from some random number I didn't recognize and it was Conrad
8 and he basically told me that I should get rid of Victoria!

9 Q. Get rid of?

10 A. Yeah, that's exactly what he said, get rid of her. He was kind of
11 whispering, and he told me that he was going to be spending Thanksgiving
12 at some fancy hotel in town because of their fight, so if I got rid of
13 her then, then no one could pin it on him, you know, because he wouldn't
14 be there. He told me to make it look like an accident, like maybe she
15 fell in the pool and couldn't get out or something. And then he offered
16 to pay me twenty large if it happened and everything worked out. I
17 mean, that's money I couldn't say no to, and I figured I could probably
18 work it all out.

19 Q. So you're saying this was Conrad Grayson's idea?

20 A. Hell yeah, man, I sure as hell had no reason to kill Victoria. I
21 mean, I had known Victoria since high school. She was a couple of years
22 ahead of me. She was always real nice to me, and I mean, she was Miss
23 Perfect in high school. I kind of had a crush on her way back then, but
24 it wasn't like it would ever go anywhere. She was way, way out of my
25 league. I sure as hell wouldn't have just up and killed her like that,
26 no way. But I mean, Conrad was offering me real money straight up, and
27 promised me big jobs for his company once he had control of everything.
28 So yeah, I knew what the deal was.

29 Q. At what time was this call from Conrad?

30 A. Um, maybe around ten twenty or so that morning. Right after we
31 finished texting. He called my cell.

32 Q. What is your cellular phone number?

33 A. It's three three eight nine six seven zero one six five, why?

34 Q. Just for our records. OK, so what did you do then?

Statement of Frankie Stevens

1 A. Um, well, I kind of thought about it a little bit, but to be honest
2 I really needed the money. I'm in kind of deep to a couple of bookies
3 in town, I made some real bad bets these last couple of months, so I
4 didn't have all that much choice. So I called Victoria's house and asked
5 if she could meet me out in the back yard to look over the work. She
6 was surprised, and she told me she had been getting so many phone calls
7 about some story that went up on the internet or something, and that my
8 call was kind of a nice change. So I kind of headed over there to meet
9 her. I didn't have much of a plan, but she was pretty thin and small
10 so I wasn't too worried.

11 Q. What happened next?

12 A. I parked my truck a bit down the road and walked up to their house
13 and started around the side to meet her out back. It's real peaceful
14 and kind of remote there, houses are real far apart from each other. So
15 I saw one of my guys' toolbox under the eaves on the side of their house,
16 and I stopped and grabbed a hammer out of it. I probably should have
17 put on work gloves or something but I guess I didn't think of that.
18 Victoria was standing there by the pool, she had her back to me just
19 kind of staring at the water. I actually made it up pretty close to
20 her before she heard me coming, and she turned around and smiled at me
21 and asked about what I wanted to show her, but then I guess she saw the
22 hammer or something, and she kind of spooked and she turned around to
23 kind of run towards the house, and I just hit her real hard on the back
24 of her head and pushed her into the pool. It was so easy, I couldn't
25 believe it. She didn't fight or anything, she just went right into the
26 water. I got a little nervous cause I figured she might swim out or
27 something, but she just kind of floated there not really moving much.
28 The whole hammer had like blood on it, so I guess I hit her harder than
29 I thought. I kind of freaked and I went and threw the hammer somewhere
30 and booked it to my car, I actually thought I was hearing police sirens
31 and stuff. And I went straight home to my apartment and just kind of sat
32 there.

33 Q. At about what time did these events happen?

34 A. Um, I got to Victoria's house at around noon thirty, maybe a little
35 later. I know I got home just after one, because I looked at the clock.

Statement of Frankie Stevens

1 I made myself dinner, and just kind of thought everything over. I know
2 I fell asleep at some point, cause when I woke up I was still in my easy
3 chair but it was just getting light out and I noticed that someone had
4 slipped an envelope under my apartment front door.

5 Q. An envelope?

6 A. Yeah, just a plain white envelope, no name on it or nothing. It
7 wasn't sealed either. I opened it up and there was a check inside it
8 from Conrad, for thirty-five grand. It definitely wasn't there when I
9 was making dinner the night before. I took the envelope and burned it
10 with my lighter just to be safe, and I was going to cash the check once
11 the banks opened back up but I never got the chance. I was kind of
12 surprised that Conrad used a check, but I figured we could explain it
13 off. Cash probably would have been better, but at least I got proof now
14 right?

15 Q. So you saw it in the morning hours of November twenty seven?

16 A. Yes.

17 Q. What did you do on the twenty-seventh?

18 A. Um, well, I tried to call Conrad's cell phone a couple times, but I
19 didn't get a response. I didn't want to text or anything, I mean, he
20 obviously knew it had happened cause the check was there. I tried
21 calling that other number he had called from, but I just got the front
22 desk people at the South Fork Inn and I hung up without talking to them.
23 I don't know, I didn't really do anything. Just stayed at home and
24 thought about what I had done and just really started to get
25 uncomfortable. To be honest it was kind of a relief when your cop there
26 came and picked me up.

27 Q. Frankie, I need to walk through your prior history with the police,
28 just for the record.

29 A. Um, I mean, OK.

30 Q. You have been arrested before, correct?

31 A. Yeah, a few times. I got busted a couple of times right when I got
32 out high school in two thousand one, and again the next year. The bars
33 in Dune Harbor are rough places, you know? And I ran with a bad crowd
34 there for a while. But I really cleaned up and turned around when I
35 spent those couple of years inside, and when I got out I had some real

Statement of Frankie Stevens

1 construction skills I put to use. I started out doing some odd jobs and
2 finally scraped together enough to start my own construction and
3 landscaping company. Most of the time it was just me and a couple of
4 guys, but for the big gig Conrad was talking about I could really get a
5 professional organization going. Guess I threw all that away.

6 Q. Frankie, I want to just briefly show you some images we recovered
7 from your Facebook page. Could you explain them to me?

8 A. Oh, um, well, yeah, I mean, I was pretty jazzed to be around Victoria
9 as much as I was. Like I said, she was the real deal in high school. I
10 was pretty head over heels for her then, and thinking about her got me
11 through my time inside.

12 Q. In your post dated November twenty-sixth, what were you referring to?

13 A. Um, Conrad's deal with me. I was just jazzed to be getting my hands
14 on that kind of money, I could finally get my life going.

15 Q. Thank you, Frankie. I am going to have this typed up, and then you'll
16 review it and we'll sign a preliminary plea agreement. You understand
17 that I can only accept your plea if you're willing to testify at Conrad's
18 trial if he's arrested.

19 A. Yeah, I totally get that. He should go down for this too, I mean,
20 it was all his idea. I'll do whatever you want me to.

Transcribed by: Mason Treadwell, Notary Public

Statement of Conrad Grayson

RE: Case 14-4583

STATEMENT OF CONRAD GRAYSON

Taken in Interrogation Room #2, Dune Harbor Police Headquarters, Dune Harbor, Louisiana, December 6, 2014, commencing at 11:15 AM.

PRESENT: Tom Kingsley
Assistant District Attorney, Flory Parish, Louisiana

Detective Jack/Jackie Porter
Badge No. 17

Conrad Grayson

Helen Crowley
Partner, Crowley Trask & Murphy LLC

Dune Harbor Police Department

1 ADA Kingsley: We are now recording. Okay. Today is December sixth. We
2 are in Interrogation Room Number 2, Dune Harbor Police Headquarters.
3 Present are Conrad Grayson, Detective Jack/Jackie Porter, Assistant
4 Public Defender Benjamin Brooks and myself, Assistant District Attorney
5 Tom Kingsley.

6 Q. (Kingsley) Conrad, you understand that you are here because you are
7 a person of interest in the circumstances surrounding the death of your
8 wife, Victoria Grayson, correct?

9 A. (Grayson) I guess, yes, but you already arrested someone for murdering
10 her.

11 Q. And you and your attorney have been informed of all of your rights,
12 and you have read, reviewed, and signed this Miranda waiver form,
13 correct?

14 A. Yes.

15 Q. OK. Mr. Grayson, you are aware that Frankie Stevens has confessed
16 to murdering your wife, Victoria Grayson?

17 A. Yes. I just...I can't believe it. To be honest, I've kind of always
18 known that Frankie had a pretty strong crush on Victoria, but I can't
19 believe that it could have developed into something like this. I know
20 that Victoria always saw Frankie as the reliable contractor, nothing

Statement of Conrad Grayson

1 more than that. But I guess who knows what happens. You know that
2 Frankie and Victoria grew up together, right? Victoria would never get
3 involved with Frankie, she was too, well, I don't want to say something
4 bad, but I guess she always considered Frankie part of a, um, different
5 world, you know? If Frankie ever tried something, I'm sure Victoria
6 would have shot that right down. And Frankie is not exactly the most
7 reliable person, you know about Frankie's past, right? It's not exactly
8 sparkling clean.

9 Q. Mr. Grayson, I'll ask you the questions, if you don't mind. Are you
10 aware that according to Frankie Stevens, you hired Frankie to murder
11 Victoria?

12 A. What? That's insane! You can't possibly believe that! That's...I
13 just...I can't believe you would actually believe that. Victoria and I
14 had problems, sure, but I never wanted her dead! This is insane!

15 Q. Mr. Grayson, please, calm down. Let's talk about your relationship
16 with Frankie Stevens.

17 A. Relationship? What relationship? Frankie did landscaping projects for
18 me and Victoria, I wouldn't call that a relationship.

19 Q. Mr. Grayson, I'm showing you text messages that we obtained from
20 Frankie's cell phone. You can see your name is listed as the contact.
21 Did you have this conversation with Frankie?

22 A. What? Yes, we had that conversation, that was the morning that bastard
23 murdered Victoria. I had just got off the phone with Victoria, she had
24 read that terrible gossip blog post, and she told me that she never
25 wanted to see me again, and then Frankie texts about coming by to talk
26 about some ridiculous pool project? I told Frankie the job was off, I
27 certainly wasn't going to want to pay to renovate the pool at my soon
28 to be ex-wife's house.

29 Q. So to be crystal clear, you sent the three messages that are colored
30 grey and located on the left side of this exhibit to Frankie?

31 A. Yes, yes. But I swear I never told Frankie that I wanted Victoria
32 dead! Oh God, you have to believe me.

33 Q. And just to be clear, the blue messages are Frankie's?

34 A. Yes, that's what I remember Frankie sending.

Statement of Conrad Grayson

1 Q. Mr. Grayson, I am now showing you a check that we recovered from the
2 home of Frankie Stevens. Do you recognize it?

3 A. Yes, I wrote that check to Frankie a few weeks ago, it was to pay
4 Frankie for work that Frankie's company did on our patio and pool.

5 Q. The check is dated November twenty-seventh, you see that there? That
6 is the day after Victoria died, isn't that correct?

7 A. Um, well, yes, I guess so, but I certainly didn't write the check
8 that day. I wrote that check a few weeks earlier, maybe at the end of
9 October, it was for Frankie to cash when the work was finished, which
10 was supposed to be for Thanksgiving. I dated it the 27th so that Frankie
11 couldn't cash it before the work was done. Frankie's company was
12 supposed to pull up all the concrete around the pool and install new
13 flagstones, level the grading around the pool area, redo the seal on the
14 patio concrete, paint it, and do some serious landscaping on the back
15 yard. It was a lot of work and had been going on for a couple of months.
16 Vi...Victoria was really proud of our yard.

17 Q. OK, so, Mr. Grayson, aside from these text messages, did you have any
18 other communication with Frankie Stevens on November twenty-sixth?

19 A. No, no, nothing. I have talked or texted Frankie maybe eight times
20 since I met Frankie three years ago. I honestly didn't even remember I
21 had Frankie's number in my phone until I got those texts. And I hadn't
22 actually seen Frankie in probably a month before Victoria died.

23 Q. Have you spoken to Frankie Stevens since November twenty-sixth?

24 A. No, never. Why would I? And Frankie definitely has never tried to
25 contact me, either. And I definitely haven't seen Frankie.

26 Q. And you never spoke to Frankie Stevens that day?

27 A. No, why did I need to? The texts took care of everything, I think.

28 Q. In the text messages, Frankie refers to a new job. What is that in
29 reference to?

30 A. Well, I had thought about putting in a sauna and pool house and wanted
31 Frankie's company to do the job. I mean, it was like a hundred k quote,
32 but we could afford it. But the situation, well, kind of all changed
33 that morning, and I sure wasn't going to book a big improvement to a
34 house I wasn't going to be living in.

35 Q. Mr. Grayson, what do you do for a living?

Statement of Conrad Grayson

1 A. Well, I own a small import and export consulting company, Grayson
2 Holdings Limited. It's focused primarily on technology development,
3 particularly cellular technology.

4 Q. How has business been?

5 A. Not that it's any of your business, but it's been a rough couple of
6 years. I tried to get in on some rare earth deals with some Chinese
7 companies, but it all kind of fell through. So, not great.

8 Q. Mr. Grayson, how did you start your company?

9 A. What does that have to do with anything? If you have to know, Victoria
10 helped me start it. Her father left her a lot of money when he passed,
11 and she wanted to see me succeed and knew that my ideas were great, so
12 she helped me get the company going. I was so lucky marrying her. I
13 never thought someone like her would look at someone like me. I guess,
14 though, maybe it wasn't the smartest move. Her family pretty much owned
15 this whole town, and my parents, well, were basically dirt farmers. I
16 thought it was love, but it didn't stick. Anyway, Victoria was the
17 source of my company's funding.

18 Q. Mr. Grayson, where were you on November twenty-sixth of this year?

19 A. Um, well, I was with Lydia Davis. You see, Victoria and I, we, well,
20 we had fallen apart. Lydia is our neighbor, and she's just everything
21 that Victoria wasn't. Lydia is kind, understanding, caring, and just
22 everything I want in my life. We had started seeing each other,
23 discreetly, this past Labor Day. She had arranged a suite for us at the
24 South Fork Inn, and we had made a pact that we would both tell our
25 respective spouses about us and then meet for the weekend to celebrate.
26 Only I hadn't told Victoria. I just couldn't see how to do it. But I
27 guess that was taken care of for me, right?

28 Q. What do you mean?

29 A. Oh come on, you saw it, everyone in town saw it. That disgusting
30 blind gossip page posted a whole expose about us. I guess employees at
31 the Inn called in. Everyone in this whole town loves a scandal. So
32 Victoria found out about me and Lydia from that. She called me the
33 morning of the twenty-sixth and she went postal on the phone. Now that
34 I think about it, she actually told me on that call that she was meeting
35 with Frankie to look over the work Frankie's company had done around the

Statement of Conrad Grayson

1 pool. But yeah, she basically told me that we were done. Not how I
2 wanted it to happen, but I guess the result was what I wanted. Lydia
3 wasn't happy, but she had already told Michael, so it's not like it was
4 as huge a deal for her. I was so angry at that gossip site, though.
5 What right do they have to post that kind of stuff?

6 Q. So, Mr. Grayson, to be clear, you were with Lydia Davis in a hotel
7 room on November twenty-sixth of this year?

8 A. Yes. Yes, OK? She and I checked in on the twenty-fifth. I had told
9 Victoria I was going to be out of town on business for Thanksgiving. I
10 know it's awful, but I just wanted to be happy again.

11 Q. So you were at the hotel until what time on the twenty-sixth?

12 A. Um, well, let's see. I got the call from Vickie at maybe nine in the
13 morning, and then Frankie texted a little after, and then me and Lydia
14 kind of talked things over, and then each of us took a shower, and we
15 decided to go and see if I could sort things out with Victoria or at
16 least get some clothes and things. So we checked out of the hotel after
17 lunch, and Lydia drove me home. I didn't have my car, I had taken a
18 taxi to the hotel.

19 Q. When you arrived at your and Victoria's home, what did you observe?

20 A. All the lights were off but Victoria's car was in the garage, I could
21 see it, so I figured she maybe went out for a run or something, so I
22 went straight up to the master bedroom and starting throwing some stuff
23 into a suitcase. I was doing that for maybe a minute at the most when
24 I heard Lydia screaming her head off from the back yard. I ran down and
25 out the back onto the patio, and I could see Lydia by the pool. She was
26 screaming and pointing at something in the water, and I just knew it was
27 Victoria. I got cold all over, and I felt kind of dizzy, and to be
28 honest I don't really remember much after that. I know that Lydia called
29 the police, and I remember them coming, and I remember seeing Vickie's
30 face when they took her...her b...body out of the pool. Oh god I'll never
31 forget her face. Her eyes just staring up like that. I knew she was
32 gone, but I wanted to there and so I made them take me to the hospital
33 with her. Why did Frankie have to do this? I just don't understand it.
34 If Frankie loved her like that, why kill her? I mean, it doesn't make

Statement of Conrad Grayson

1 sense. And I never got to tell her how sorry I was about everything with
2 me and Lydia. I just...

3 Q. Mr. Grayson, I have to ask. With Mrs. Grayson's death, what happens
4 to her property?

5 A. Oh, um, well, we signed a pre-nup when we got married, her family's
6 attorney made me pretty much. I guess they always saw me as a money
7 grabber. I think it all goes back to her family, I don't really remember.
8 I know it was all hers, she always considered everything to be hers.
9 The house, the cars, everything was hers. That's why I wanted to build
10 the pool house, so I could have a place to myself. I don't remember
11 much of all of that business, her family had like an army of lawyers
12 there and I just signed what they put in front of me. I always knew the
13 money was all Vickie's. And I know that my company is about to turn
14 around, and plus Lydia is comfortable, so it's not like I have much to
15 worry about. I'll get by, I grew up not having much as it is.

Transcribed by: Mason Treadwell, Notary Public

IN THE: SEVENTY-SEVENTH JUDICIAL DISTRICT COURT, PARISH OF FLORY

STATE OF LOUISIANA,

- versus -

CONRAD GRAYSON

}
}
}
}
}

No. 14 CR 4583

TESTIMONY OF DETECTIVE JACK/JACKIE PORTER

1 **Hon. Elizabeth Blackwell:** OK. Today is April twenty-seventh, twenty fifteen. We're
2 continuing a hearing on the defense's motion to quash the indictment. I am hearing testimony
3 pursuant to Article 537 of the code of criminal procedure. ADA Kingsley, do you have any
4 witnesses to call to rebut the defense motion?

5 **Q. [ADA Kingsley]:** Yes, Your Honor. The People of the State of Louisiana call Detective
6 Jack/Jackie Porter.

7 **Clerk:** Do you swear to tell the truth, the whole truth and nothing but the truth?

8 **A. [Porter]:** Yes.

9 **Q. [ADA Kingsley]:** You are Detective Jack/Jackie Porter, Badge Number 17, and you are
10 employed by the Dune Harbor Police Department?

11 **A.** Yes.

12 **Q.** You were the principal investigator into the death by drowning that occurred on or about
13 November 26, 2014 at 2340 Ocean Point Drive here in Dune Harbor?

14 **A.** Yes, that's correct. I am the supervising officer of the Homicide Investigations Unit of the
15 Dune Harbor Police Department and I was the commanding officer of this investigation.

16 **Q.** Thank you, Detective. How long have you been employed by the Dune Harbor Police
17 Department?

18 **A.** I've held the rank of detective for four years this coming June. I held the rank of police
19 officer for nine years prior to my promotion to sergeant, and I held the rank of sergeant for six
20 years.

21 **Q.** So you joined the force when?

22 **A.** I entered the Louisiana State Police Academy in May of 1996.

23 **Q.** What formal education after high school did you receive?

1 **A.** I have a Bachelor's Degree, magna cum laude, in Criminal Justice from Texas State
2 University, and I received that degree in 1996. I have also completed the Federal Bureau of
3 Investigation's Advanced Criminology and Investigatory Tactics training, which is an intensive
4 six-month program held at the FBI headquarters in Washington.

5 **Q.** Do you have any other formal education or training?

6 **A.** Other than my on the job training and the police academy and our in-services yearly, no.

7 **Q.** Detective, how many homicides have you investigated over the course of your career?

8 **A.** Thankfully, Dune Harbor has a very low rate of homicides. I have been the lead
9 investigator on sixteen homicides in my career.

10 **Q.** Detective, how did you first learn of the incident at 2340 Ocean Point Drive?

11 **A.** A call to the Dune Harbor PD 911 system was received, and a call for unit response was
12 made to all patrol vehicles. I was on my lunch break when the call came through my vehicle
13 unit, and I responded to the location broadcast by dispatch. I arrived at the same time as
14 responding EMT units from the Dune Harbor Fire Department.

15 **Q.** Detective, I am showing you Exhibit 3, which is a copy of your investigative report in this
16 case. Do you recognize it?

17 **[Ms. Crowley]:** I reserve my right to object to this being introduced at trial.

18 **[Judge Blackwell]:** Noted. Proceed, Mr. Kingsley.

19 **A.** Yes, I recognize this; it is my investigation report for the homicide of Victoria Grayson.

20 **Q.** Is it fair to say that your report fairly and accurately summarizes the scope and duration of
21 your investigation and that you would testify to the same here today?

22 **A.** Yes. It is my standard practice to document all relevant activities taken related to my
23 investigation.

24 **Q.** Is everything that you wrote in your report truthful and accurate?

25 **A.** Yes. I confirm here today that I everything I wrote in my report is truthful and accurate.

26 **Q.** Detective, did you conduct any additional investigation of this event that is not noted in
27 your report?

28 **A.** No, I did not.

29 **Q.** Your Honor, we offer this report solely for this court's consideration of the defense motion
30 to quash.

31 **[Judge Blackwell]:** I will consider the contents of Exhibit 3 solely for purposes of deciding
32 the instant application. Defense counsel, your objections are preserved for trial.

33 **[Ms. Crowley]:** Thank you, judge.

Testimony of Det. Jack/Jackie Porter

1 **Q.** At the time you placed Mr. Conrad Grayson under arrest, did you believe that you
2 possessed probable cause to make an arrest for solicitation to commit murder?

3 **A.** Yes, I did. The available evidence, in my opinion, corroborated my theory that Mr. Grayson
4 solicited the murder of his wife in order to provide access to his wife's substantial trust funds
5 for his struggling company and to facilitate better relations with his mistress, Lydia Davis.
6 This theory is also supported by the confession of Frankie Stevens.

7 **Q.** In your opinion, is Frankie Stevens a creditable witness?

8 **A.** Yes. I believe Frankie's story, and it is consistent with the evidence I have reviewed.

9 **Q.** Thank you, Detective. Nothing further.

10 **[Judge Blackwell]:** Counsel for the defense, do you wish to cross?

11 **Q. [Ms. Crowley]** Yes, Your Honor. Helen Crowley of Crowley Trask & Murphy LLC for
12 Conrad Grayson. Detective, are you aware that Frankie Stevens has had strong romantic
13 feelings for the deceased for over a decade?

14 **A.** Yes, well, I believe that Frankie admitted to a high school crush on Mrs. Grayson in
15 interrogation. I did not believe that Frankie's feelings were relevant to Victoria Grayson's
16 murder.

17 **Q.** Detective, have you ever been the subject of disciplinary actions by the Dune Harbor
18 Police Department?

19 **A.** Not since becoming a police officer. I did get a command discipline while I was in the
20 academy for failure to wear the correct uniform, and I was docked two vacation days. A
21 command discipline is something supervisors can give to cadets. No trouble since then.

22 **Q.** That's all I have.

23 **Judge Blackwell:** Thank you, Detective. You're excused. We'll take a brief recess and then
24 we'll reconvene and hear oral argument from counsel.

I, MASON TREADWELL, Notary Public and Assistant Court Reporter of the Judicial District Court of Flory Parish, Criminal Division, Part A, do hereby state that I caused to be reported the proceedings had at the hearing of the above-entitled matter, and I certify this is a true and correct transcript of the proceedings had.

Examination Before Trial of Lydia Davis

SEVENTY-SEVENTH JUDICIAL DISTRICT COURT, PARISH OF FLORY

STATE OF LOUISIANA, }
 }
 - versus - } No. 14 CR 4583
 }
CONRAD GRAYSON }

EXAMINATION BEFORE TRIAL OF LYDIA DAVIS

EXAMINATION BEFORE TRIAL of Lydia Davis, taken before Mason Treadwell, a Notary Public of the State of Louisiana.

Present:

Tom Kingsley, Assistant District Attorney
Helen Crowley, attorney for defendant Conrad Grayson
Lydia Davis

Lydia Davis, called as a witness in the above action, having been first duly sworn by Mason Treadwell, a Notary Public of the State of Louisiana, on this, the 13th day of March, 2015, was examined and testified as follows:

- 1 Q. (Ms. Crowley) Good morning. Please state your name for the record.
2 A. My name is Lydia Davis.
3 Q. Lydia, where do you live?
4 A. Well, right now I am living in a new home on Soundview Drive here in
5 Dune Harbor, while my divorce from my husband is finalized.
6 Q. Oh, I am sorry to hear that.
7 A. Don't be! It's been a long time coming and I'm just glad it's finally
8 happening. Now once all this business with Conrad is over we can finally
9 be together.
10 Q. Well, so, Ms. Davis, that brings me to what we're here about today.
11 You are aware that you have been listed as a possible witness for the
12 trial of Conrad Grayson?
13 A. Oh yes. And I just know Conrad had nothing to do with that terrible
14 murder. He and Victoria had a lot of problems, I know, but I can tell
15 you for certain that he had absolutely nothing to do with her death.
16 Q. And how is it, Ms. Davis, that you know that?

Examination Before Trial of Lydia Davis

1 A. Well, because Conrad and I were together the whole time the day
2 Victoria died. I'm the one who called 911 when we found her, for God's
3 sake. Oh I'll never forget that terrible moment, I actually thought
4 Conrad was going to pass out. Seeing Victoria in the pool and and...Oh
5 God, it was horrible. But now at least Conrad can move on.

6 Q. Ms. Davis, where were you on November 26 of last year?

7 A. Well, Conrad and I had spent the night together, at the South Fork
8 Inn. I'm not proud of it, but we found each other and we made each
9 other happy. Yes, we were both married, but neither of us was happy.
10 Conrad always had to live in Victoria's shadow, I mean, you know she
11 comes from big money, right, and Conrad, well, he has big dreams, but
12 his parents have a little farm a couple hours north of here. Everyone
13 was so surprised when Victoria decided to marry him, I know her father
14 thought Conrad was just after her money. But they really loved each
15 other, at first. Victoria just was too controlling and they fell apart.
16 Not like me and Michael. That was a business transaction from day one.
17 We first started seeing each other about a year ago, but we met when he
18 and Victoria bought their house on Ocean Point Drive. My ex-husband
19 Michael was actually their realtor, and we live just down the road.
20 Conrad and I just hit it off right away, I knew as soon as I met him
21 that he was the man for me. And I think he felt it too. But we didn't
22 get involved until the Labor Day picnic last year, that's when we first,
23 well, you know, um, got intimate.

24 Q. Thank you, Ms. Davis. So, you were at the South Fork Inn the entire
25 day?

26 A. Oh, um, we checked in on the 25th in the afternoon. We had made kind
27 of a pact, OK? We had both decided that we were going to have told our
28 spouses that we were ending our marriages before Thanksgiving, so I had
29 booked the suite so we could be together and celebrate finally being
30 free. I had already told Michael that we were done that previous
31 Saturday, when we came back from one of our awful weekly dinners at his
32 mother's house. But, well, when I picked Conrad up on the 25th, he
33 confessed that he hadn't told Victoria yet. I got a little worked up
34 about that, I have to be honest, and he promised me that he would tell
35 her that weekend. So, anyway, we checked into the inn in the afternoon

Examination Before Trial of Lydia Davis

1 on the 25th, and we were supposed to stay through Thanksgiving, but so
2 much happened once that awful article got posted and we ended up checking
3 out at about one in the afternoon on the twenty-sixth.

4 Q. When you say an article got posted, you are referring to the anonymous
5 article that was posted to the Dune Harbor gossip blog?

6 A. Yes, that horrible rag website. I don't know why people read that,
7 it's total trash, but everyone in town lives and dies by it. Oh, sorry,
8 that's an awful thing to say, isn't it? So yes, we were in the Villa
9 Suite at the Inn on the night of the 25th, and my phone just started
10 lighting up the next morning with people texting me about the story that
11 had been posted, so then I went online and looked at for myself and I
12 almost got physically ill reading it. Conrad went white as a sheet when
13 he saw it, and I swear seconds after he read it, Victoria called him.
14 She was irate, I could hear her screaming over the phone.

15 Q. What time approximately was it when she called?

16 A. Well, we had already had breakfast, so I'd say it was around maybe
17 10:30 am. No later than noon, definitely, because Conrad and I talked
18 for a while about the best way to handle things and then we had to pack
19 up and get ready to leave.

20 Q. So what did you decide to do once you saw the story?

21 A. Conrad wanted to sue the website, but, I mean, it was kind of the
22 truth, right? And I mean it's awful, but at least it was out. He just
23 felt terrible about hurting Victoria, really. He wanted to be the one
24 to tell her, and that awful gossip blog did it for him. Oh she was
25 furious. When they were talking, I heard her say that he could kiss
26 every penny he'd ever seen from her goodbye, and that she would
27 absolutely ruin him in the divorce. Conrad just kept apologizing, and
28 I heard him say to her that he didn't want any of her money, that he
29 understood that it was all hers. It ended with Victoria telling Conrad
30 that he was out, and that he should come pick up his things.

31 Q. At any point prior to, during, or after the events of November 26th
32 did Mr. Grayson mention the name Frankie Stevens to you?

33 A. The construction worker who killed Victoria? No, not that day.
34 Actually, Victoria was the one who had mentioned Frankie to me, strangely
35 enough. At last year's town Memorial Day picnic, Victoria pulled me

Examination Before Trial of Lydia Davis

1 aside and told me that the contractor on her big front yard landscaping
2 project had made some, um, amorous advances on her. Victoria said that
3 this Frankie person had apparently confessed to having loved her for
4 years, and that apparently Frankie had been watching Victoria from afar
5 and that Frankie believed that Conrad was terrible for Victoria.
6 Victoria said that she felt really kind of creeped out by Frankie, and
7 that she didn't really know what to do. My advice to her was to never
8 be around Frankie alone, that Conrad or someone should always be there
9 when Frankie was working at their house, because to me Frankie sounded
10 like a grade A stalker.

11 Q. But just to be clear, Conrad never mentioned Frankie to you?

12 A. No, not Conrad. Never. I mean, Conrad would talk about renovation
13 projects and stuff, but no real mention of Frankie. And Victoria never
14 talked to me about anything with Frankie again, just that once.

15 Q. What did you do once Conrad and Victoria finished their phone call
16 that morning?

17 A. Well, once Conrad got off the phone with Victoria, he threw his phone
18 into his bag and left it there. I didn't see him on it again at all
19 that day. And like I said, he and I stayed in our room for a while just
20 talking things over. Eventually Conrad decided that he needed to go see
21 Victoria face to face and talk it out, and to get his stuff. And we
22 both wanted to get out of that hotel, the idea of staying there after
23 their staff sold our story to that gossip blog was ridiculous. So we
24 packed our things and went to check out, that was around maybe one.

25 Q. At any time on November 26th did Mr. Grayson leave you for any length
26 of time?

27 A. No, never. Well, I mean, he went to the bathroom for a few of minutes
28 after his call with Victoria, but he definitely didn't leave our suite.
29 And he didn't have his car at the Inn, I drove us, so he couldn't have
30 slipped out the bathroom window and traveled the like eight miles between
31 the Inn and his house to murder Victoria, that's ridiculous. So no, he
32 and I weren't apart at all that day. We wanted to be alone together,
33 you know? That was the whole point of staying at the Inn. And that was
34 all ruined.

35 Q. OK, so you checked out of the Inn at about one pm?

Examination Before Trial of Lydia Davis

1 A. Yes. We checked out, and I got the hotel to not charge us for the
2 extra night we had booked, which frankly I think was the least they could
3 do for us, and I took Conrad over to their house to get his stuff and
4 talk to Victoria. He went inside to pack a bag, and I just kind of
5 wandered around to the side of the house. The garage doors were closed
6 and there were no lights on, so I think we just assumed Victoria wasn't
7 home. God knows I didn't want to see her. So, I just kind of ended up
8 in the back yard, I don't know why. And I saw a pair of sandals just
9 kind of left on the pool edge and I went to go pick them up. I'm kind
10 of a neat freak. And that's when I saw Victoria. She was, oh god, just
11 floating there in the pool. I started screaming and Conrad came running
12 out of the house. And I'll never forget what happened then. He just
13 screamed "Victoria!" once and then he turned and vomited into the grass.
14 He completely lost control of himself. I called 911, but it was obvious
15 there wasn't anything we could do for her. She was floating there just
16 so perfect and still and not moving.

17 Q. You didn't try to help her?

18 A. No, I mean, it was just so very obvious she was dead. No one would
19 float like that, and she didn't move at all when I screamed. I don't
20 know why I didn't go in the pool, but I didn't. She was dead, and I
21 just got really calm and I called 911, and the 911 operator told me not
22 to endanger myself by trying to assist and wait on the EMTs.

23 Q. What time was this?

24 A. Um, well, we checked out a little after one, and it took about twenty
25 minutes to drive to Victoria and Conrad's house from there, so maybe one
26 forty five?

27 Q. Ms. Davis, while you were at the South Fork Inn, did you place any
28 telephone calls from the hotel phone?

29 A. What? No, why would I? I had my cell phone if I needed to call someone,
30 but in fact I didn't make any calls at all. Lots of texts, especially
31 once that damned story hit the internet, but no calls.

32 Q. OK. What did you do next?

33 A. The police got there pretty quickly. Conrad was just a mess, so I
34 talked to the police officer and told them what had happened. They had
35 me take Conrad over to the patio, and I sat him down and one of the

Examination Before Trial of Lydia Davis

1 officers got him a glass of water from the kitchen. The police officer
2 asked us both some questions, and then once they had taken Victoria's
3 body out of the pool, Conrad got really worked up again and demanded to
4 go with her in the ambulance. I mean, she was obviously dead when they
5 took her out of the water, her face was the most horrible color I've
6 ever seen, but he wanted to go with her, so they let him ride in the
7 ambulance. I drove along behind them. We got to the hospital, and they
8 took Victoria away and Conrad came out and said "she's gone". Michael
9 had already texted me that morning to tell me he was going to go stay
10 with his parents, so I took Conrad home with me. We spent an awful
11 evening there. I unplugged the phone once the press started calling and
12 closed all of the curtains and turned off the TV and made Conrad go lay
13 down. Probably the worst Thanksgiving of my life. It was awful. Conrad
14 wouldn't say a word all that next day. He just stared at the wall or a
15 book or whatever food I was trying to get him to eat. He eventually
16 started to come back to himself, but it took a while. He was just so
17 shaken up.

18 Q. Thank you, Ms. Davis. Is there anything else you can think of that
19 might be helpful?

20 A. Well, you can probably tell that Conrad and I are expecting a baby,
21 she's due in July. I was apparently about three weeks pregnant when
22 Victoria died, but I didn't know at the time. And I can tell you it's
23 definitely Conrad's. I have already bought us a new house for when all
24 of this is finally behind us and Conrad and the baby and I are going to
25 build a life together. I don't care if he has a penny, I have more than
26 enough money for both of us. I just know he could never have killed
27 Victoria, he loved her so much. They just weren't right for each other.
28 Conrad and I were made for each other, and I'm just so glad we finally
29 found each other. I just don't understand why that horrible, horrible
30 Frankie Stevens would do this. Victoria and Conrad always treated their
31 workers really well. They paid them on time, and they paid them really
32 generously. I know Victoria was really demanding and she expected to get
33 top dollar work done, that's just how she was raised, but I can't imagine
34 killing her over a pool renovation, it just doesn't make sense. It's
35 so horrible. I guess Frankie just snapped, all that pent up feeling for

Examination Before Trial of Lydia Davis

1 Victoria must have boiled over or something. If Conrad could have just
2 had one more day and that awful gossip blog hadn't posted that story,
3 maybe he could have told Victoria and ended things cleanly. But I guess
4 things happen the way they happen. All I know is that Conrad had nothing
5 to do with this, he couldn't have. That's why I got him the best lawyers
6 in the state, to get these awful charges dismissed.

7 Q. Thank you, Ms. Davis. That's all I have.

Transcribed by: Mason Treadwell, Notary Public

**SEVENTY-SEVENTH JUDICIAL DISTRICT COURT
STATE OF LOUISIANA
NO. 14 CR 4583 PART "A"**

STATE OF LOUISIANA

VERSUS

CONRAD GRAYSON

POTENTIAL EXHIBITS

The parties in the above-referenced action, having conferred prior to trial, have stipulated that the following documents and materials, in addition to all witness depositions and the parties' pleadings, will compromise the range of possible exhibits to be presented to the jury and court during any trial in this action.

77th JUDICIAL DISTRICT COURT
SECTION 1
JUDGE ELIZABETH BLACKWELL

STATE OF LOUISIANA
VERSUS
FRANKIE STEVENS

DOCKET NO:
14 CR 4516

PLEA OF GUILTY AND WAIVER OF RIGHTS

I, **Frankie Stevens**, desire to enter a plea of guilty to the charge(s) of:

COUNT 1: SECOND DEGREE MURDER (La. Rev. Stat. § 14:30.1)

and have been informed of and understand the charge(s) to which I am pleading as well as the following rights:

1. My right to be represented by an attorney at each stage of these proceedings and if I cannot afford an attorney, one will be appointed to represent me at trial and on appeal:
2. My right to plead not guilty (or persist in that plea if already made) and go to trial by judge and jury:
3. At trial, the State would have the burden of proving my guilt beyond a reasonable doubt and I would have the right to the assistance of an attorney, to confront and cross-examine witnesses against me, not to be compelled to incriminate myself and to subpoena witnesses to testify in my behalf.
4. By pleading guilty, there will be no trial because I am waiving my right to a trial and all the above rights.
5. I am entitled to a trial.
6. I understand the nature and elements of the crime I am charged with committing and by pleading guilty. I will be convicted of this offense which can be used to enhance the sentence of a future criminal conviction, unless waived in the Plea Agreement below;

VICTIM(S):

Victoria Grayson

ARREST & CONVICTION RECORD

1. October 31, 1997 - Simple Assault (La. Rev. Stat. 14:38); 48 hours incarceration.

2. March 17, 2000 - Simple Assault (La. Rev. Stat. 14:38); Simple criminal damage to property (La. Rev. Stat. 14:56); 15 days incarceration, \$400 restitution.
3. November 3, 2002 - Possession of Schedule II Narcotic [Methamphetamine] (La. Rev. Stat. 40:967(B)(1)); 2 years incarceration

RECOMMENDED SENTENCE

Life imprisonment.

SPECIAL CONDITIONS

I agree to testify fully, truthfully, and accurately at any subsequent grand jury proceedings, trial, and/or penalty phases regarding the alleged involvement of Conrad Grayson and/or any other person(s) in this crime. I understand that failure to abide by this condition will result in revocation of this agreement, and that I will be prosecuted on any charges contained in the original grand jury indictment (namely, first-degree murder) and may be subject to a more serious sentence than those recommended herein.

I further state that my plea in this matter is free and voluntary. It has been made without any threat of inducements whatsoever from anyone associated with the State of Louisiana. The only reason I am pleading guilty is that I am, in fact, guilty as charged and would have been convicted had there been a trial or I am fearful and confident that if I went to trial I would be convicted of this offense or a more serious one and might receive a more serious sentence. I further agree to the imposition of the sentence described in the Plea.

Done this 13th day of April, 2015 at Dune Harbor, Louisiana.

Tom Kingsley

Prosecuting Attorney

Ashley Davenport

Defense Attorney

Frankie Stevens

Defendant



FLORY PARISH CORONER'S OFFICE
Coroner: Michelle Banks, M.D.
P.O. Box 17, Dune Harbor, LA 71737

REPORT OF AUTOPSY

DECEDENT: Victoria Grayson

CASE NO: FP 0001566-01

MANNER OF DEATH: Homicide

IDENTIFIED BY: Conrad Grayson

AGE: 34 years

GENDER: Female

RACE: Caucasian

DATE OF DEATH: November 26, 2014

DATE AND TIME OF AUTOPSY: November 26, 2014 at 7:23 p.m.

PERFORMED BY: Michelle Banks, M.D., Coroner and Medical Examiner

CAUSE OF DEATH: Drowning as a result of traumatic injury

AUTOPSY FINDINGS

- I. 34 year old female, clothed in wet black cotton dress, black cotton undergarments, no footwear.
- II. Blunt force injury to anterior of head. Multiple cranial fractures to the anterior of the head concentrated on right rear lobe. Linear fracture on right side of skull. No other signs of simple or sexual assault.
- III. Lack of bruising to torso indicates no resuscitation attempts conducted pre-mortem. Compression fracture consistent with resuscitation present, but lack of bruising indicates resuscitation attempt occurred after death.
- IV. Evidence of drowning: approximately 3 ml of fluid in sphenoid sinus. Larynx, trachea, and bronchi are filled with a fine white froth. Lungs are voluminous and heavy. Sections of both lungs show abundant amount of watery fluid and froth.

Stomach and esophagus show no abnormality except minor white froth and some partially digested food.

- V. Fatal Period: Death occurred in 3 to 6 minutes of complete submersion. Body was in water for approximately 1 hour. Estimate time of death was between 11:45 am and 12:45 pm.

TOXICOLOGIC TESTS

Blood, urine, bile, stomach contents, liver tissue, and kidney tissue samples taken for toxicologic investigation by the undersigned. Toxicologic tests returned negative for all samples:

IMMUNOASSAY SCREEN:

Amphetamines	Negative	0.100
Barbiturates	Negative	0.100
Benzodiazepines	Negative	0.100
Cannabinoids	Negative	0.100
Cocaine Metab	Negative	0.100
Fentanyl	Negative	0.100
Methadone	Negative	0.100
Opiates	Negative	0.100
Tricyclics	Negative	0.100
Salicylates	Negative	0.100

CONCLUSION

In consideration of the circumstances surrounding the death of the decedent Victoria Grayson, and upon examination of the body and its contents, it is my opinion that the death of Victoria Grayson was the result of drowning as a result of a traumatic head injury, and that this death is a homicide. This report will be referred to the Dune Harbor Police Department for further investigation.

Michelle Banks, M.D.

Michelle Banks, M.D.
Coroner



DUNE HARBOR POLICE DEPARTMENT

In Partnership With the Community

**Municipal Building, 5th Floor
Dune Harbor, Louisiana 71737**



Subject: Investigation Report #14-0167-02
Homicide (Decedent: Victoria Harper Grayson)

Investigator: Jack/Jackie Porter, Detective First Degree
Badge No. 17

The above officer was the first and primary DHPD responder to a 911 call for medical and assistance received by DHPD Dispatch at 1:49 p.m. on November 26, 2014. Above officer was informed by DHPD Dispatch that said 911 call was made by a person identifying herself as “Lydia Davis” and reporting that she had discovered a body floating in the backyard pool. Above officer responded to reported address; 2340 Ocean Point Drive.

Upon arrival at scene at 1:57 p.m., above officer escorted responding unit of DHFD ambulance service to rear of house. Above officer observed an individual who self-identified as Conrad Grayson agitatedly pacing next to pool, along with woman who self-identified as Lydia Davis. Above officer also observed female adult floating face-down in the pool. Mr. Grayson exclaimed “Oh god help me, I think she’s dead” upon our approach, then proceeded to vomit into the nearby lawn. Ms. Davis reported that she had arrived at location approximately 2-3 minutes before 911 call was placed; she had wandered into the back yard while Mr. Grayson had been packing a suitcase inside the residence. She further reported that upon arriving at pool area, she had observed Mrs. Grayson floating in pool; she immediately called 911 and then screamed for Mr. Grayson, who arrived at the pool “within seconds” of her shouting. Ms. Davis further reported that neither individual had attempted to aid individual in pool, stating that it was “obvious there wasn’t anything anyone could do.”

DHFD units entered pool and removed decedent’s body, which was immediately identified by Mr. Grayson as his wife, Victoria Grayson. Above officer took one photograph of pool scene prior to DHFD entry. DHFD units attempted cardiopulmonary resuscitation, but Mrs. Grayson was non-responsive. Mrs. Grayson was then transferred to a stretcher and transported to Clarke Memorial Hospital in Dune Harbor. Mr. Grayson accompanied his wife in the ambulance. Above officer was informed that Victoria Grayson was formally pronounced dead upon arrival at the hospital; case was referred to the Dune Harbor medical examiner for autopsy. Suspicious death file was opened under file number 14-0167-01, above facts were entirety of said report.

After DHFD units left, above officer secured scene. CSI officers of DHPD responded to scene at 2:26 p.m., and conducted a full search of the property, under direct supervision of above officer. A standard claw hammer was recovered from beneath a lawn chair on the Grayson property patio;

a red blood-like substance with black hairs sticking in it was observed on the head of the hammer. Hammer was bagged and vouchered by above officer, and submitted for analysis to DHPD CSI. All doors to Grayson home found to be locked, sweep of building and premises revealed no other persons on site. No other physical evidence was found by any officer at scene, and interior premises indicated that the house had not been burgled. Prints taken of all access doors to home.

Coroner's report rec'd by above officer at 8:15 am November 27, 2014. Based on coroner's recommendation, this homicide file was officially opened and suspicious death file closed.

Report received from DPHD CSI at 9:33 am November 28, 2014. Latent full thumb and index finger prints recovered from grip of hammer via cyanoacrylate testing. Positive fingerprint identification match made via IAFIS, match to statistical certainty to prints on file for a Frankie Stevens of Dune Harbor. Prints originate from Louisiana State Penitentiary file for Stevens. No other useable prints found on hammer. Prints taken from access doors to home match those of Conrad and Victoria Grayson, no other useable prints recovered. Red substance on hammer head determined to be blood; hair recovered from head of hammer matches that of Victoria Grayson and blood typing matches that of Victoria Grayson.

Above officer obtained arrest warrant for Frankie Stevens at 5:03 pm November 29, 2014. Warrants signed by Judge E. Blackwell.

Stevens arrested by above officer with two units assistance at home, 671 Surfside Avenue Apt 4, at 8:17 pm November 29, 2014. No resistance. Stevens was Mirandized by above officer and invoked right to silence. No statements made during course of arrest. House was searched pursuant to warrant; a check made out to Stevens drawing on account of Conrad and Victoria Grayson recovered on kitchen table. Vouchered by above officer. Search of social media for Frankie Stevens returned four posts made to Stevens' Facebook account deemed relevant to incident; incorporated by above officer into this file.

Interrogation of Stevens commenced at 8:17 am November 30, 2014. Stevens provided full confession to murder of Victoria Grayson, implicated Conrad Grayson in murder. Stevens charged and booked on one count, first-degree murder (RS 14:30), held pending arraignment.

As result of Stevens interrogation, above officer commenced investigation of Grayson marital relationship. Obtained copy of Grayson-Harper prenuptial agreement from Flory Parish Clerk's Office. Obtained summary of banking records for Victoria Harper Grayson from Flory National Bank via search warrant signed by Judge Blackwell on December 2, 2014. Obtained hotel room receipt from South Fork Inn to verify Grayson and Davis alibis.

Conrad Grayson brought in for questioning on December 6, 2014 upon consent of his attorney. Statement taken in presence of ADA Kinglsey, who recommended arrest of Mr. Grayson for solicitation to commit murder. Mr. Grayson placed under arrest and charged/booked on same.

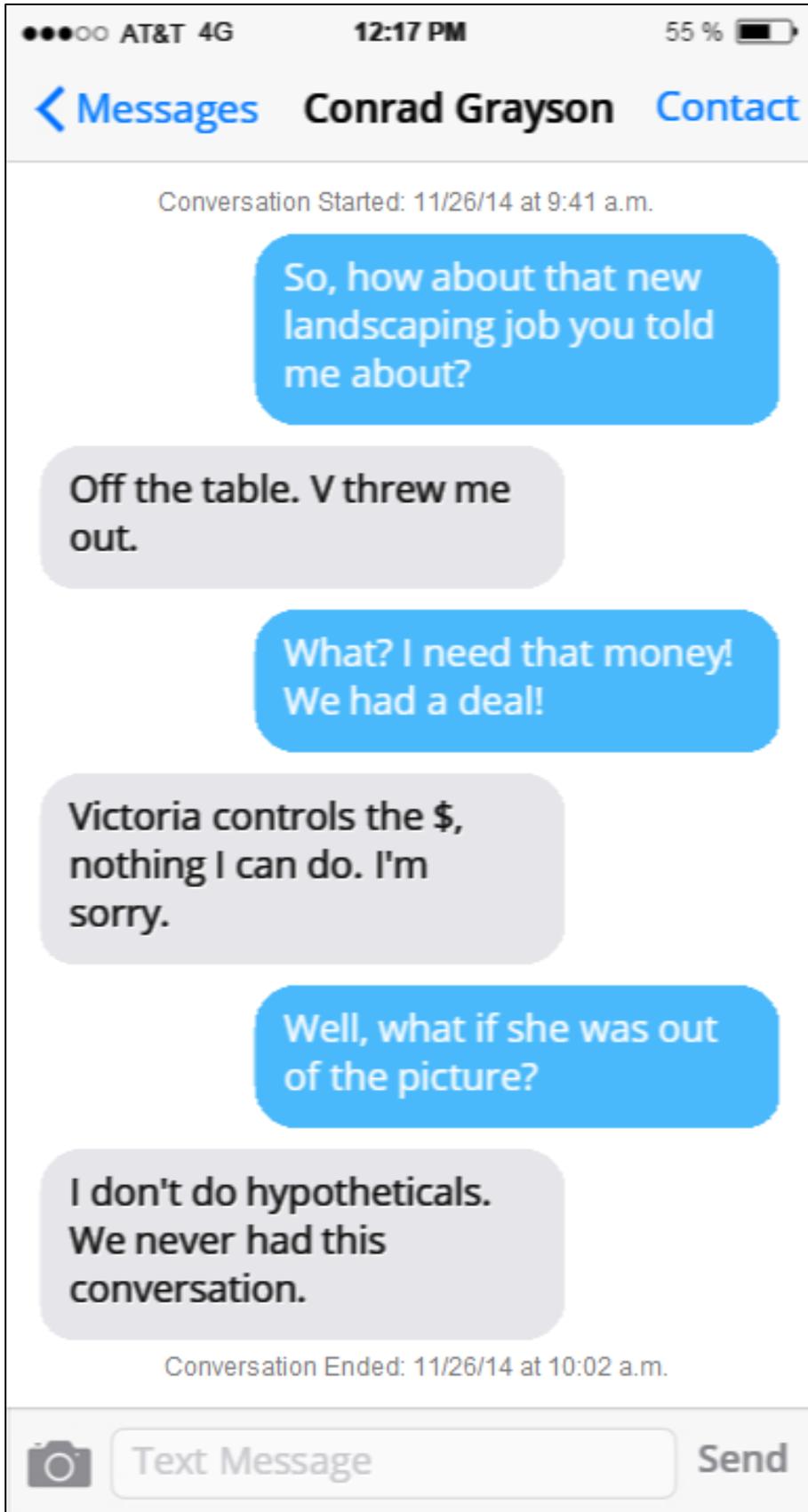
Date: January 22, 2015

Det. Jack/Jackie Porter (Bdg. 17)











Conrad & Victoria Grayson
2340 Ocean Point Drive
Dune Harbor, LA 71737

1936

11 / 27 / 2014

DATE

PAY TO THE ORDER OF *Stevens Landscape Designs*

\$ 35,000.00

Thirty-five thousand and 00 / 100

DOLLARS



FOR *Pool area reno*

Conrad Grayson

⑆000000186⑆ 000000529⑆ 1000

DUNEHARBOREXPOSED.COM

SEARCH DUNEHARBOREXPOSED.COM 

TODAY

ARCHIVES

TIPS

TROUBLE IN PARADISE?

POSTED NOVEMBER 25, 2014 AT 11:29 PM BY [DRAMA CAN LEAK](#)

#COULDNTHAPPENTONICERPEOPLE

#CHEATERSNEVERWIN

#LYDIADAVIS

#MICHAELDAVIS

#CONRADGRAYSON

#VICTORIAGRAYSON

#HOPEYOUHAVEAGOODLAWYER

#COMMUNITYPROPERTY

#SOUTHFORKINN



DuneHarborExposed.com has CONFIRMED that Dune Harbor (MARRIED!) “businessman” Conrad Grayson and (MARRIED!) “socialite” Lydia Davis were spotted entering the Villa Suite of the posh South Fork Inn earlier this afternoon. Sources at the South Fork Inn report that Grayson and Davis were “hot and heavy” and “canoodling” on the storied hotel’s private beach, and that two bottles of champagne and various romantic desserts very recently made their way to the oh-so-private Villa Suite via room service.

Conrad Grayson is, of course, “MARRIED” to “WIFE” Victoria. The “HAPPY” couple resides at 2340 Ocean Point Drive. Lydia Davis is the “WIFE” of Michael Davis, local accountant. The Davises reside at 2346 Ocean Point Drive. Neither couple has children (luckily!).

We have of course previously [reported](#) on the widespread rumors of a Grayson-Davis affair. It has been understood amongst the yachting and polo-playing set that the hypocrites Conrad and Lydia have been stepping out on their spouses for months, but now their cheating has been CONFIRMED. Their spouses must finally face reality.

Grayson, of course, will face financial ruin, as wife Victoria’s SUBSTANTIAL trust fund set up by her [real estate baron father](#) is the sole source of support for Grayson’s struggling business endeavors.



South Fork Inn

7160 State Beach Route 16
Dune Harbor, Louisiana 71737

Traveler: Lydia Davis 41677 Cayman Way Dune Harbor, LA 71737 USA No. of Guests: 2	Folio No: 38863 A/R No.: N/A Group Code: N/A Membership No.: 8611 Invoice: 6713171-8	Room: Villa Suite Arrival: 11/25/2014 Sched. Depart: 11/27/2014 Actual Depart.: 11/26/2014 Time of Checkout: 1:19 pm
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Date	Description	Charge(s)	Credit(s)
11/25/14	Parking: Valet (2 Nights)	45.00	-
11/25/14	Room Accommodations: Villa Suite	419.00	-
11/25/14	Room Service: 2 bottles Veuve Cliquot Brut Yellow Label; 1 charcuterie tray; 1 tiramisu; 1 crème brulee	167.00	-
11/25/14	Room Service: 1 English Breakfast (Standard); 1 Yoghurt Parfait; 1 Pot Turkish Coffee; 1 Orange Juice (Lg); 1 Pomegranate Smoothie	84.00	-
11/26/14	Long Distance Telephone Fee Call Duration: 4 minutes, 2 seconds Call Placed To: 338-967-0165	2.17	-
11/26/14	Occupancy Tax (4%)	16.76	-
11/26/14	American Express Platinum XXXXXXXXXXXX1000	-	733.93

Guest Signature: _____

Lydia Davis

Thank you for visiting us at the South Fork Inn!
Qualifying points for this stay will be automatically credited to your account.
We look forward to welcoming you again soon.



TO: DETECTIVE JACK/JACKIE PORTER
FROM: NOLAN ROSS, DIRECTOR, DEPARTMENT OF INSTITUTIONAL FINANCIAL RECORDS, FLORY NATIONAL BANK
RE: WARRANT SEARCH – HARPER-GRAYSON ACCOUNTS
DATE: DECEMBER 2, 2014

Dear Detective Porter:

Pursuant to the warrant served upon this bank by the Dune Harbor Police Department, I have prepared the following summary of the current financial holdings of Victoria Harper Grayson and Conrad Grayson and any related companies, trusts, and/or managed accounts. Balances below are current as of today's date. Please let me know if we can be of any further assistance.

- Account Number C-0000000529
 - Joint Checking Account, Victoria & Conrad Grayson
 - Date Opened: December 7, 2006
 - Current Balance: \$626,201
- Account Number T-001040155
 - Trust Savings Account, Victoria Harper Grayson
 - Trustee(s): Nolan Ross; Maxwell Harper (deceased)
 - Date Vested: August 17, 2002
 - Current Balance: \$2,267,012
- Account Number IMIA-000815
 - Integrated Managed Investor Account, Victoria Harper Grayson
 - Assets: \$1,457,228 (Average Annual Return: 9.6%)
 - Fixed Income [18.4% Total Asset]:
 - U.S. Bonds [13% Total Asset]: \$267,998
 - Cash [5.5% Total Asset]: \$79,746
 - Equities [81.6% Total Asset]:
 - U.S. Stocks [60.3% Total Asset]: \$1,025,563
 - International Stocks [8.5% Total Asset]: \$124,453
 - Real Estate [2.7% Total Asset]: \$39,214
- Account Number C-0000001066
 - Personal Checking Account, Conrad Grayson
 - Date Opened: February 16, 2001
 - Current Balance: \$1,791
- Account Number BC-006101551
 - Business Checking Account, Grayson Holdings Ltd. (Conrad Grayson, Sole Prop.)
 - Date Opened: March 15, 2009
 - Current Balance: -\$17,901
 - Account to be closed February 1, 2015 (Reason: Persistent Negative Balance [6 mos.])

**Frankie Stevens**

Saw my high school crush today. She is still just so perfect and wonderful. I wish we could make a life together, but she didn't even give me the time of day.

Like · Comment · December 17, 2011 · 🌐

 4 people like this.

**Frankie Stevens**

Got a gig working on HER house. I can't believe I get to be close to her every day. I am over the moon.

Like · Comment · September 9, 2014 · 🌐

 2 people like this.



**PRENUPTIAL MARRIAGE CONTRACT
FOR SEPARATE PROPERTY REGIME
BETWEEN
VICTORIA HARPER
AND
*CONRAD GRAYSON***

BE IT KNOWN that this Prenuptial Marriage Contract is entered into on the dates and at the places set forth at the end of this document before a Notary Public, duly commissioned and qualified in and for the Parish/County and State indicated, between Victoria Harper and Conrad Grayson.

Victoria Harper, of the full age of majority and a domiciliary of Flory Parish, Louisiana, declares that she has never before been married.

Conrad Grayson, of the full age of majority and a domiciliary of Flory Parish, Louisiana, declares that he has never before been married.

The above named parties intend to be married on November 26, 2006, and intend to be domiciled in Flory Parish, Louisiana, but may have one or more residences in addition to their legal domicile.

The parties intend that this Prenuptial Marriage Contract shall be enforceable as written in every state in which they are domiciled and/or reside, and knowingly and voluntarily renounce any and all state laws at variance with the terms and conditions of this Prenuptial Marriage Contract.

The parties are individually represented by independent legal counsel of their own choosing, and have relied only on the legal representations made by their own independent legal counsel; they have not, in any way, relied on the legal representation afforded to the other party, or assert that any promises were made by the other party other than as contained within this Prenuptial Marriage Contract.

The parties acknowledge that they have had an opportunity to request any and all asset and liability information from the other, and each party acknowledges that the other party has provided any and all requested documents, and each party acknowledges that he or she is fully satisfied with the documentation produced and with their opportunity to review financial documentation of the other and/or his or her opportunity to request additional documentation from the other party. The parties acknowledge that they knowingly and voluntarily waive the right to request any additional documentation from the other concerning the other's assets and liabilities.

In anticipation of their marriage, the parties desire to fix and determine certain rights between them by this Prenuptial Marriage Contract. This contract shall become effective only upon their marriage.

The parties acknowledge that nothing in this Prenuptial Marriage Contract shall bar or be construed to limit or restrict the right of either party to make or receive a voluntary transfer, conveyance, bequest or devise from the other, during their joint lifetime, by will, the laws of intestacy, or otherwise. Property or income so transferred or conveyed shall become the separate property of the donee, devisee, or legatee. To the extent a future will or other testamentary document of one party attempts to establish dispositions inconsistent with this Contract, that

document is void unless both parties expressly consent to such alterations and a concomitant alteration to this agreement.

The parties knowingly and voluntarily accept the provisions of this Prenuptial Marriage Contract in lieu of and in full discharge, settlement and satisfaction of any and all rights and claims which either party may otherwise have had to the property and the estate of the other person by reason of their marriage.

The parties shall be and remain separate in property. The legal regime of the community of acquets and gains, as provided by Louisiana law or any other community property law state, or the marital property laws of any other jurisdiction as now written or amended in the future, shall not exist between the parties under except as noted herein. There shall be neither community property nor marital property between them, except as explicitly contemplated herein.

The parties agree that all of his or her property and income of whatever nature, from whatever source, and however acquired, whether owned or acquired before the marriage or owned and acquired during the marriage, is and shall remain his or her separate property. There shall be no jointly owned property between them, nor any other type of property claim to the property of the other party. The legal presumption shall be in favor of separate property, and that no other type of property shall be owned by either of the parties, and the legal presumption shall be that neither party has a claim of any type, legal or equitable, to the property owned by the other party, except as explicitly contemplated herein.

The parties acknowledge that each of them, individually, is the owner of separate property, and each party knowingly and voluntarily waives an itemization of that property. The parties acknowledge that each party desires that the separate property of each party remain the separate property of each party, and each party reserve to himself or herself, as the case may be, individually, the entire administration and control of such property for his or her sole separate use and benefit. Further, Victoria Harper acknowledges that she has previously made gifts to Conrad Grayson, which are presently in Conrad Grayson's possession, and further acknowledges that the gifts are the separate property of Conrad Grayson, which gifts include a Greubel Forsey watch and a Mercedes Benz automobile.

Victoria Harper reserves to herself all fruits and revenues of all of her separate property, whether such fruits be natural or civil, including, but not limited to, interest, dividends and rents, and the reinvestment of the separate property and including any enhancement to the separate property, for her own separate use and benefit, and for her sole administration and control. Moreover, all salaries, reimbursable expenses, pension and profit sharing benefits and all other benefits resulting from Victoria Harper's investments, trust accounts, and family inheritance before and during the marriage shall be and remain her separate property, except as otherwise explicitly provided herein. Conrad Grayson knowingly and voluntarily waives and relinquishes any right which he might otherwise have had in the future, or claims of improvement, to Victoria Harper's separate property, which improvements result from joint labor or property of them both or otherwise.

The parties acknowledge that now, and after the date of the marriage between the parties, each party shall separately retain all rights in his or her own separate property and each of them has and shall have the absolute and unrestricted right and power to manage and to dispose of such separate property, free from any claim that may be made by the other party for any reason including, without limitation, except as to the death of one of the parties named herein.

In the event of the death of either party, all heretofore otherwise separate property shall be considered community property and disposed of in accordance with the intestacy laws of the State of Louisiana, unless it is proven that one of the parties herein intentionally caused the death of the decedent.

The parties acknowledge that neither party shall be personally liable for the debts contracted by the other party, regardless of whether the debt was contracted before or during the marriage.

The parties acknowledge that, in the event there is a termination of the marriage, each of the parties individually releases the other under any laws of any state, any United States' districts, territories or possessions, or any foreign nation, as presently or hereafter written or placed in effect providing for equitable distribution of income or property upon termination. Without limiting the generality of the foregoing, each party specifically waives any right or claim of equitable distribution of marital property and any right of a distributive award or legal share under the laws of any of the states of the United States, whether that state has a common law or community property regime.

Each party knowingly and voluntarily waives any and all rights which he or she might otherwise have had to claim alimony *pendente lite*, post-divorce support, alimony, maintenance (separate or otherwise) or temporary maintenance under the laws of any state in the United States, of any state or jurisdiction now, during, or after the marriage between the parties, except as is specifically set forth in this paragraph. The parties acknowledge that they are aware, and have been advised, that case law in some states is not settled regarding waivers of pre-divorce and post-divorce support, but they reaffirm that they wish this contract to be enforced exactly as written, and desire that this knowing and voluntary waiver of support be enforced as written. In the event the state which has ultimate jurisdiction over an issue of support does not recognize a waiver of pre-divorce support, then the parties knowingly and voluntarily request that all other waivers regarding post-divorce support be enforced as written. This section shall not preclude the issuance of an order of child support for the custodial parent of any child(ren) conceived of this marriage.

The parties agree that if any provision of this Prenuptial Marriage Contract is held to be unenforceable, the remainder of this Prenuptial Marriage Contract shall nevertheless remain in full force and effect.

The parties acknowledge that this Prenuptial Marriage Contract contains their entire understanding of their marital regime. The parties acknowledge that there are no other agreements, financial or otherwise, or representations, promises, or warranties concerning their marital regime other than as set forth in this contract. The parties acknowledge that they are entering into this contract freely and voluntarily.

The parties knowingly and voluntarily acknowledge that they are entering into this Prenuptial Marriage Contract freely and voluntarily, and not as a result of any fraud, duress, undue influence imposed on him or her by the other party or by any other person or persons, or any promises not contained in this Contract; that they have ascertained and weighed all of the facts and circumstances; that each has consulted with an attorney of his or her own free choice, independently of each other, which whom each is fully satisfied; that their respective attorneys have duly apprised each of the parties of their rights, and that this Prenuptial Marriage Contract shall not be merged in any decree or judgment granted in any such action or proceeding but shall survive the same and shall be forever binding and conclusive upon the parties.

The parties acknowledge that they clearly understand and agree to all of the provisions of this Contract and they desire that this agreement be enforced as written; and that each of the parties believes that the terms of this Prenuptial Marriage Contract are fair and reasonable, and in their individual best interest.

The parties acknowledge that this Prenuptial Marriage Contract contains the entire understanding of the parties. There are no representations, warranties, promises, covenants or undertakings, oral or otherwise, other than those expressly set forth in this Contract. No provision of this Prenuptial Marriage Contract shall be changed, nor shall this Prenuptial Marriage agreement be terminated, nor any of the obligations be discharged in whole or in part, orally or otherwise, other than by a written instrument executed by the parties in the same manner as this Prenuptial Marriage Contract.

This Prenuptial Marriage Contract shall be governed, construed, interpreted and enforced in accordance with the laws of the State of Louisiana.

THUS DONE AND PASSED, in triplicate originals, on the date and at the location indicated, in the presence of the undersigned competent witnesses, and indicated Notary Public, after due reading of the whole.

PARTIES:

Victoria Harper
Victoria Harper

Conrad Grayson
Conrad Grayson

WITNESSES:

Patrick Osborne
Patrick Osborne

James Brennan
James Brennan

DONE BEFORE:

Paul Whitley
NOTARY PUBLIC

Done this 20th day of November, 2006, in Dune Harbor, Flory Parish, Louisiana.

My commission expires: October 2009.

This document has been duly filed and recorded in the
Parish Records of Flory Parish, Louisiana.
Dated: November 20, 2006.

Sarah Munello
Sarah Munello
Flory Parish Clerk

