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7 **EIGHTH JUDICIAL DISTRICT COURT**
8 **CLARK COUNTY, NEVADA**

9 **STATE OF NEVADA,**

10 **Plaintiff,**

11 **vs.**

12 **HENRY JAMES RUGGS, III**

13 **Defendant.**

CASE NO. C-23-373594-1
DEPT. NO. 17

14 **DEFENDANT HENRY JAMES RUGGS'S SENTENCING MEMORANDUM**
15 **IN MITIGATION OF PUNISHMENT**

16 COMES NOW, Defendant, **HENRY JAMES RUGGS, III** ("Mr. Ruggs"), by and through
17 his undersigned counsel of record, **DAVID Z. CHESNOFF, ESQ.**, and **RICHARD A.**
18 **SCHONFELD, ESQ.**, of the law firm of **CHESNOFF & SCHONFELD**, and hereby respectfully
19 submits his Sentencing Memorandum in Mitigation of Punishment.

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24 ///

1 This Sentencing Memorandum in Mitigation of Punishment is made and based upon the
2 papers and pleadings on file in this matter, the attached Memorandum of Points & Authorities,
3 attached exhibits, and any and all oral argument adduced at the time of hearing.

4 **DATED** this 1st day of August, 2023.

5 Respectfully Submitted:

6 **CHESNOFF & SCHONFELD**

7

8 /s/ David Z. Chesnoff
9 **DAVID Z. CHESNOFF, ESQ.**
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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 **I. INTRODUCTION:**

3 Henry James Ruggs, III (“Mr. Ruggs”) was 22 years old at the time of the instant offense,
4 and wishes that he could turn back time and change the outcome of the tragic events of November
5 2, 2021.

6 Mr. Ruggs has pled guilty and has accepted responsibility for his conduct and there is
7 nothing in Mr. Ruggs’s background that could have predicted this tragic event. Mr. Rugg’s
8 conduct was aberrant given his background as described in more detail herein.

9 Mr. Ruggs was released on SCRAM and electronic monitoring, and has made every effort
10 to conduct himself in an exemplary manner.

11 We respectfully submit that the stipulated sentence of 3 to 10 years in the Nevada
12 Department of Corrections (“NDOC”), with a concurrent six month sentence on the misdemeanor
13 offense, is the appropriate sentence in this case.

14 **II. PLEA NEGOTIATIONS:**

15 On May 10, 2023, Mr. Ruggs pled guilty to the charge of Driving Under the Influence
16 Resulting in Death (Count 1). Mr. Ruggs also pled guilty to a misdemeanor charge of vehicular
17 manslaughter (Count 2). The parties have stipulated that the Court should impose a sentence of
18 3 to 10 years in the NDOC on Count 1 and six months in the Clark County Detention Center
19 (“CCDC”) on Count 2, with said sentences running concurrent.

20 The parties have further stipulated that the felony sentence will control, and Mr. Ruggs
21 will not serve CCDC jail time nor will a warrant or detainer be lodged as that would impact Mr.
22 Ruggs’s classification. The parties further stipulated that the Court would maintain jurisdiction
23 to modify and suspend the misdemeanor sentence in the event that a detainer or warrant is lodged.

24 The resolution is conditioned upon the Court accepting the stipulations of the parties.
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1 **III. PRESENTATION:**

2 **A. Mr. Rugg's Background:**

3 Attached hereto as Exhibit A is a report from Dr. Sheila Balkan regarding Mr. Ruggs as
4 a person. Dr. Balkan interviewed Mr. Ruggs, his father Henry Ruggs Jr., his fiancée Kiara Je'nai
5 Kilgo Washington, Ms. Kilgo-Washington's mother Demitria Kilgo-Washington, Mr. Ruggs's
6 manager Latavius Powell, and Mr. Ruggs's aunt Rev. Karen Matthews.

7 While the report is attached for the Court's review, a summary of its content is provided
8 hereinbelow.

9 Mr. Ruggs grew up as a shy individual, and in elementary school he started to invest his
10 time in baseball and football, then ultimately focused on basketball. In high school the problems
11 that existed at Mr. Ruggs's home were significant. It became clear to Mr. Ruggs that his mother
12 had started to take large amounts of prescription drugs, and had been an unreliable presence that
13 never acted in a motherly way. When Mr. Ruggs's mother was particularly problematic he would
14 stay at his friend Roderic's house, often for weeks at a time.

15 Mr. Ruggs's home environment was described as "destabilizing, confrontational and
16 exhausting." Mr. Ruggs "always worried about it". In the tenth grade, Mr. Ruggs moved out of
17 the house and brought his younger brother Kevontae with him, where they lived with their older
18 half-brother James. The three of them lived in a one bedroom apartment. Mr. Ruggs, who had
19 faith as a key part of his early upbringing, would look to the church as a constant in his life.

20 Outside of the house, Mr. Ruggs kept his focus on sports and at the urging of his friend
21 Roderic, returned to football after a two year hiatus. After joining the highschool football team,
22 Mr. Ruggs was quickly recognized as the school's best player. To this day, faculty from the
23 school continue to recognize that Mr. Ruggs was something special. Former Assistant Principal
24 Chris Daniels, who has known Mr. Ruggs for 8 years, wrote an unsolicited letter describing Mr.
25 Ruggs as someone who "exemplified excellent character on a daily basis" and an individual that
26 was "respectful, trustworthy, courteous, and extremely humble." See, Exhibit B.

1 On March 3, 2016, Mr. Ruggs's closest friend, Roderic, passed away at the age of 18. Mr.
2 Ruggs did not talk to anyone for a week. He lost his best friend. Mr. Ruggs felt tremendous guilt
3 because he, not Roderic, was supposed to be in that car but he fell ill that day and did not go. Mr.
4 Ruggs eventually came to see his life as a tribute to his late friend and has attributed his success
5 in football to Roderic.

6 Rick Arnold, a highschool teacher from Mr. Ruggs's school, wrote "Henry Ruggs III had
7 every opportunity to throw in the towel, walk away and leave everything he had accomplished
8 athletically and academically" when Roderic died. See, Exhibit C. Instead it "added fuel to
9 Henry's fire to succeed. He not only stepped up personally, but he also made it his mission that
10 Rod would not be forgotten."

11 In February of 2017, after receiving approximately 30 scholarship offers, Mr. Ruggs
12 agreed to attend the University of Alabama. Mr. Ruggs was not only interested in the athletics,
13 he was also focused on academics and quickly earned a place on the Dean's list at the University
14 of Alabama. Late in Mr. Ruggs's junior year he declared for the National Football League
15 ("NFL") draft and was selected by the Las Vegas Raiders as the top wide receiver of 2020. Mr.
16 Ruggs entered into a four year contract, which was thereafter terminated as a result of the
17 incidents that give rise to this case.

18 By all accounts, Mr. Ruggs is a kind-hearted, hard-working, community and family
19 focused person. The conduct in this case is clearly aberrant.

20 **B. Additional Letters of Support:**

21 Exhibit D - Letter from Alabama state Rep. Phillip Ensler.

22 In this letter, Rep. Ensler explains that Mr. Ruggs suffered significant trauma in his
23 life. He states:

24 This amount of trauma would understandably be unbearable for
25 most people to deal with. Many would collapse under such
26 enormous emotional pain, while also having such a high-profile,
27 high-pressure career. Henry, though, felt the best way to honor
28 their lives was to keep doing his best. He wanted to continue to
make them proud and continue to do what he has always done, be
a source of goodness to our community. His ability and
willingness to do this speaks to his selflessness and deep sense of
responsibility.

1 Exhibit E - Letter from Michael Locksley, the head football coach at the University
2 of Maryland and former coach of Mr. Ruggs. In this letter he explains:

3 As someone who worked tirelessly with Henry on and off
4 the field as he navigated college and beyond, I am of the
5 firm belief that Henry's recent decisions and actions are
6 contrary to his disposition in life...

7 Exhibit F - Letter from Tiffani Cain, the payroll clerk at Robert E. Lee High School
8 who met Henry at the start of his freshman year. In this letter she states:

9 His participation in school and extracurricular activities are
10 often referenced to current students as a blueprint on how
11 they too could be successful and a responsible member of
12 not only the student body of Robert E. Lee High School, but
13 society...

14 During and after high school, Henry would often send
15 words of encouragement to students at Lee HS and be
16 available to spend time with the youth of Montgomery
17 mentoring and offering support during difficult times. He
18 has remained humble and approachable through his
19 various successes.

20 Exhibit G - Letter from Frank Carr, an IT Instructor at Robert E. Lee High School.
21 In this letter he states:

22 As a community leader, before the world knew his
23 [Henry's] name, he was already a mentor to younger kids in
24 the community letting them know that in order to be
25 successful in life you have to work hard and stay focused on
26 your dreams. Coming home and speaking to our students is
27 a priceless tool that a teacher has to motivate the youth and
28 Henry never declined an opportunity to stop in and help us
in that area. ... [H]e always made time for his Lee family and
the city of Montgomery.

29 Exhibit H - Letter from Sherron Fantroy, who teaches advanced writing at Robert
30 E. Lee High School. In this letter she explains:

31 [Henry] is a quiet motivator, he has an aura around him
32 that encourages others to be their best without settling for
33 less. He motivates others by doing and he encourages as he
34 motivates. Henry's sincere, humble personality far exceeds
35 his talent and his persona as an athlete. Very few athletes of
36 Henry's caliber can maintain a modest composure, but
37 Henry has a sincere, genuine personality. He has helped
38 many people, served his community, and represented his
loved ones, family, friends and others with the utmost
respect.

1 Exhibit I - Letter from Willard McFeely, Jr. who was president of the football
2 booster club at Henry's high school. In this letter he explains:

3 I have always known [Henry] to be a very focused,
4 disciplined, and caring young man. He always had good
5 grades and was always the first to help when I needed
6 assistance. During his senior year, the football team was
7 ruled ineligible for the playoffs because of an illegal
8 player. A lot of people were in his ear telling him not to
9 worry about it because he had his scholarship to the
10 University of Alabama. Henry, being the leader that he is,
11 took control of the team and even stepped in and played
12 quarterback for the rest of the season because of an injury
13 to his teammate. This is an example of how he strived to
14 make others better rather than thinking of himself...I
15 know he is deeply regretful of this unacceptable behavior
16 that resulted in the loss of a life.

17 Exhibit J - Letter from Patricia Mohammed, a high school English teacher of 23
18 years. In this letter she states:

19 In a high school, reputations are established and hard to
20 change. In Henry's case, he was consistently spoken well of
21 on the field or court, as well as off of it. His reputation was
22 and still is that of a gifted and humble young man.

23 As Henry's star continued to rise, we all watched with pride
24 as he remained grounded in the face of increasing praise,
25 which would have warped one of lesser character. As he
26 returned to visit his Lee "FamiLee," he humbly listened as
27 we questioned him about everything from his adjusting to
28 campus life, attending class and playing in Bryant-Denny
Stadium. His demeanor remained that of a grateful and
focused young man which only solidified his place in our
hearts and expanded his fan base. In a time of overexposure
and an ever-increasing parade of attention-seeking and self-
promoting individuals, it was a pleasure to know that we
could point to Henry as an example of goodness inside of
greatness.

Exhibit K - Letter from Whitney S. Walker stating:

Henry is one of the most hard-working, passionate, honest,
dependable, and caring individuals that I have had the
pleasure of meeting over the years. As I have completed
five years as a math teacher at Lee High School, I can say
without a doubt that Henry is the most outstanding student
and athlete that I have encountered. His character goes well
beyond what he can do academically and athletically —
evident the first time I met him...

1 Henry became a community leader who gives back to
2 Robert E. Lee High School and the Montgomery
3 community. Before his first football game as a Las Vegas
4 Raider, Henry became involved in the Las Vegas
5 community as well, donating over 3,000 meals to Three
6 Square Las Vegas.

7 Despite the unfortunate circumstances that bring this letter
8 about, I can attest that Henry Ruggs, III is still the honorable
9 community leader and noble human being I met more than
10 five years ago.

11 Exhibit L - Letter from Dr. Karen Matthews, Mr. Ruggs's great aunt. In this letter
12 she states:

13 Throughout the years, Henry always exemplified a
14 loving heart, and a noble character with family values.
15 He is one who appreciates and respects his spiritual
16 morality, and is not capable of intentionally harming any
17 living being in our society.

18 Exhibit M - Letter from Delano R. Muhammad, J.D., teacher at Robert E. Lee High
19 School. In this letter she states:

20 When I saw this news story, I knew that something did
21 not seem right. Only the court in Las Vegas can
22 determine the facts and ultimate cause of Ms. Tintor's
23 death, but I knew that this car accident did NOT
24 represent the character of a great young man who
25 entered Robert E. Lee High School less than a decade
26 ago, Henry Ruggs, III.

27 Exhibit N - Letter from Daniel Ballard stating:

28 I'm a big believer in second chances and once Mr.
Ruggs is given the second chance, he will be forever
grateful for the opportunity. You will be proud and
love the young man just as we do.

C. Treatment:

Mr. Ruggs attended in-patient trauma related treatment at the Mental Health Collective from May 2, 2022 to May 30, 2022. Attached hereto as Exhibit O is a letter from Dr. Zaleski, the Medical Director at the Mental Health Collective. The Mental Health Collective provides neuro-informed, attachment-focused, evidence-based treatment for

1 adults suffering from trauma. The letter from Dr. Zaleski reflects that Mr. Ruggs was
2 actively engaged in his treatment.

3 **D. Compliance with Conditions of Release:**

4 Mr. Ruggs was arrested on November 2, 2021. On November 3, 2021, Mr. Ruggs
5 was released on high level electronic monitoring and with SCRAM monitoring. Mr. Ruggs
6 has been compliant with his release conditions, which amount to house arrest, for 21
7 months.

8 **E. Mr. Ruggs Respectfully Requests that This Honorable Court Accept the
9 Stipulations of the Parties:**

10 From the attached materials, it is evident that Mr. Ruggs is a man of good character
11 who made a terrible mistake. The letters also establish that his remorse is deep and sincere.

12 Because Mr. Ruggs is a first-time offender, from a sentencing perspective, this is
13 important. As was noted in *United States v. Germosen*, 473 F.Supp.2d 221, 227 (D. Mass.
14 2007), there is “a demonstrable difference in the recidivism rates of real first offenders”
15 “Minimal or no prior involvement with the criminal justice system is a powerful predictor of
16 a reduced likelihood of recidivism.” *Id.*

17 The United States Supreme Court in *Gall v. United States*, 552 U.S. 38, 51, 128 S.
18 Ct. 586, 596-97 (2007) recognized that at a sentencing every convicted person must be
19 treated as an individual and “every case as a unique study in the human failings that
20 sometimes mitigate, sometimes magnify, the crime and punishment to ensue.” *Gall v.*
21 *United States*, 128 S. Ct. 586, 589 (2007).

22 In light of Mr. Ruggs’s post-offense conduct, it is clear that he has made positive
23 changes in his life, has accepted responsibility, and has sincere remorse. Mr. Ruggs has an
24 otherwise exemplary background with a focus on contributing to his community and those
25 who are in need.
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1 It is respectfully submitted that the stipulated sentence of 3-10 years in the NDOC,
2 with a concurrent six month sentence on the misdemeanor offense, is a significant punitive
3 sentence which is sufficient, but not greater than necessary, under the circumstances.

4 **IV. CONCLUSION:**

5 In light of the foregoing, Mr. Ruggs respectfully requests that this Honorable Court
6 impose a sentence of 3-10 years in the NDOC, with a concurrent six month sentence on the
7 misdemeanor offense, with the felony sentence controlling and no warrant or detainer being
8 lodged on the misdemeanor. It is further requested that the Court maintain jurisdiction to
9 modify and suspend the misdemeanor sentence in the event that a detainer or warrant is
10 lodged.

11 **DATED** this 1st day of August, 2023.

12 Respectfully submitted:

13 **CHESNOFF & SCHONFELD**

14 /s/ David Z. Chesnoff

15 **DAVID Z. CHESNOFF, ESQ.**

Nevada Bar No. 2292

16 **RICHARD A. SCHONFELD, ESQ.**

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18 Attorneys for Defendant

Henry James Ruggs, III

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- EXHIBIT A: Biography and Report from Dr. Sheila Balkan;
- EXHIBIT B: Letters from Chris Daniels;
- EXHIBIT C: Letter from Rick Arnold;
- EXHIBIT D: Letter from Rep. Phillip Ensler;
- EXHIBIT E: Letter from Michael Locksley;
- EXHIBIT F: Letter from Tiffani Cain;
- EXHIBIT G: Letter from Frank S. Carr Jr.;
- EXHIBIT H: Letter from Sherron Fantroy;
- EXHIBIT I: Letter from Willard McFeely, Jr.;
- EXHIBIT J: Letter from Patricia Muhammad;
- EXHIBIT K: Letter from Whitney S. Walker;
- EXHIBIT L: Letter from Dr. Karen Matthews;
- EXHIBIT M: Letter from Delano R. Muhammad;
- EXHIBIT N: Letter from Daniel Ballard;
- EXHIBIT O: Letter from Dr. Zaleski.

EXHIBIT

A

PROFILE OF SHEILA BALKAN, Ph.D.

310 779-5737

sheila@drbalkan.com

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I hold a doctoral degree in Sociology from the University of California at Los Angeles, 1983. My specialization is in criminology, mental illness and deviant behavior. My dissertation addressed the effectiveness of juvenile probation camps in Los Angeles County. Related academic work included teaching Sociology courses at UCLA and Los Angeles Valley College, and eight years as a researcher in areas of crime, delinquency, and mental health. I have served as a research consultant for Los Angeles County Probation Department, Los Angeles Department of Mental Health Social Services, and Los Angeles County's "gang unit."

In May 2018, I was appointed by Los Angeles County Supervisor Sheila Kuehl to the 5-person Probation Reform and Implementation Team, an oversight commission to the Los Angeles County Probation Department.

My work as a criminologist in private practice began in 1980, and, after forty-two years, I have consulted on some 7000 criminal cases throughout the country in federal, state and juvenile courts. Services have included comprehensive social profiles and assessments, identifying downward departures and mitigating factors, alternative sentencing plans, and topical research for presentation in bail modification, preplea reports, sentencing proceedings, and penalty phase work in capital cases. Alternative sentencing plans have contained components such as innovative community service projects, including a nationwide anti-drug advertising campaign in conjunction with the entertainment industry, a domestic violence video that won a Telly Award for best Public Service Announcement, a weekly food distribution program to help feed the homeless that was given a Presidential Commendation, and the installation of state-of-the art music studios in inner city schools and parks for at-risk youth.

Working extensively with individuals who have substance abuse problems, I have conducted interventions and provided appropriate referrals for treatment. I am well versed in the principles of 12-Step programs (AA, NA, CA and SA). I have found that criminal conduct is often the consequence of a dual diagnosis condition, requiring both psychiatric and substance abuse treatment.

I have testified as an expert witness and have served as an expert in numerous biographical documentaries and news programs. Publications include co-authorship of a college textbook entitled Crime and Deviance in America (Belmont: Wadsworth, 1980), and social science journal articles concerning violent offenders and juvenile delinquency. Articles on sentencing considerations in White Collar and Corporate crime have appeared in Trial Talk, the journal of the Colorado Trial Lawyers Association (May 1990), Trial Magazine, a publication of the Association of Trial Lawyers of America (March 1993, October 1996), the Complex Crimes Journal of the American Bar Association (1993), the American Bar Association's West Coast Regional Subcommittee Program (2001), and 2004 Federal Criminal Law Practice, Los Angeles County Bar Association, Criminal Justice Section. An autobiographical piece was included as a chapter in Storytelling Sociology, Narrative as Social Inquiry, (Berger & Quinney, Lynne Rienner Pub., 2004).

Working under contract to Warner Bros. (2001), I was the subject of a television pilot based on my work as a criminologist and served as a consultant and producer to the NBC project.

Sheila Balkan, PhD
Criminologist
310.779.5737
sheila@drbalkan.com

May 15, 2023

David Chesnoff, Esquire
Richard Schonfeld, Esquire
Chesnoff and Schonfeld PC
520 S. 4th Street
Las Vegas, NV 89101

Re: Henry Ruggs III
Case #21CR050378

Dear Attorneys Chesnoff and Schonfeld,

As you requested, the following report is a background investigation of Henry Ruggs III, age 23. Mr. Ruggs was a professional football player with the Las Vegas Raiders until he was discharged from his contract after he was involved in a car crash on November 2, 2021, that caused the tragic death of Tina Tintor, a young woman driving in another vehicle. Mr. Ruggs has been charged with Felony Driving Under the Influence of Alcohol. He has no prior criminal record.

Mr. Ruggs has been charged with a very serious offense, but there is virtually nothing in Mr. Rugg's background to predict this tragic occurrence. Overcoming a great deal of adversity, Mr. Ruggs graduated from high school as a model student and went on to college at the University of Alabama. Never one to cut corners, he has always acted responsibly, as a student, athlete, fiancé and father.

By all accounts, Mr. Ruggs worked very hard and purposefully to become a star athlete, and is well regarded by his former teammates, coaches, and teachers. In spite of his success, Mr. Ruggs is a humble man who is well-liked for his kind and helpful nature.

While the charges in this case indicate that on the night of the accident, Mr. Ruggs was traveling at a high speed of 126 MPH at the moment of impact with a blood alcohol level of .161, there is nothing in his background to suggest that he is a problem drinker or involved with drugs.

INTRODUCTION

For this report, I interviewed Henry Ruggs III (hereafter known as Henry), his elder brother Henry James Timmons (“Henry James”), his father Henry Ruggs Jr (“Henry Jr.”), his fiancée Kiara Je'nai Kilgo-Washington with whom he shares a toddler, Kiara’s mother Demitria Kilgo-Washington, his financial manager Latavius Powell, and his great aunt Rev. Karen Matthews.

Henry’s mother Nataki Ruggs née Mumpfield and his younger brother Kevontae Ruggs were *not* interviewed. Both struggle with drug addiction and placed great pressure on Henry, including through their self-destructive behavior. He concluded after much introspection that the only sustainable solution was to essentially cut them out of his life. This will be discussed later in this report.

Henry makes no distinction between his six siblings and half-siblings, considering them all to be family. The two eldest are from his father’s previous relationship. His brother, Courtney Timmons, 34, lives in Montgomery, Alabama, where he works in a parts factory for trucks and trailers. Henry James Timmons, 31, is a truck driver who also lives in Montgomery. Henry is closest to Henry James and lived with him for two years in high school; it was a way for Henry and his younger brother Kevontae to escape a conflictual environment at home. There are two other brothers, Darius, 27, who also lives in Montgomery where he works in a warehouse; he is Nataki’s son from a previous marriage, and the youngest, Johnnie Darbie, 16, who is in high school. Henry has no blood connection to Johnnie — he is the child of Henry Jr.’s ex-wife by another father — but Henry feels like they are brothers.

The Best Friend

The defining friendship of Henry’s life was with Roderic Scott.

By several accounts, Henry was a shy boy when he befriended Roderic in elementary school and they started to play basketball together nearly every day at the YMCA in Montgomery. Henry also became invested in baseball and football, before largely giving up on the latter sport because he and Roderic dreamed of making it to the NBA. They would often play basketball three or four times *daily*.

In high school, their fraternal bond strengthened even as Henry’s home life disintegrated. In an interview, Henry’s great aunt, Rev. Karen Matthews recalls the chaos and confusion Henry’s parents caused in the home...

All of the kids, Henry included, didn’t have an understanding of what the problems were at home. The kids had questions about it but were never really sure what was going on. I would bring the boys to my home to make sure they weren’t lost in the process. They would

stay for days at a time.

It would later become clear to Henry that his mother had started to take large amounts of prescription drugs, but older family members recognized the signs much sooner. At the time, Henry only knew that his mother was an unreliable presence who almost never offered him encouragement or acted in any sort of motherly way.

During that time, Henry saw his best buddy as a generous and positive force who supported and encouraged him. When Henry's mother was particularly problematic, Roderic would invite Henry to stay at his family's home for weeks at a time. Roderic provided sports gear, including clothing, socks, and shoes; things Henry could rarely, if ever, afford to buy.

Meanwhile, Henry's parents' fractious relationship was weighing on him, so he attempted to throw himself into sports even more. Kiara, who was then a close platonic friend, explained that the situation resulted in a destabilizing, confrontational and exhausting home environment. "Henry always worried about it," she recalls.

Unable to put up with the conflict at home and feeling unwelcome there, Henry moved out of the house, taking his younger brother Kevontae with him. They squeezed into the one-bedroom apartment where their older half-brother Henry James lived. At the time, Henry was in 10th grade.

His mother was furious. Rather than understand that home life for her two teenage sons was insupportable, family members say Nataki felt betrayed. She insisted that she wouldn't do anything for her boys unless they returned to the family's home.

But they had found a more reliable, supportive family member. Henry James, who then worked night shifts at a Hyundai plant, provided them with a place to sleep and with the limited food he could afford while they all lived paycheck to paycheck on his income. When he wasn't working, Henry James would come home to cook for his younger half-brothers, and the three of them took turns sleeping in the one real bed. Henry and Kevontae kept their few possessions in a large trash bag in the living room. Despite the sparse conditions, they found a modicum of peace thanks to the resourceful, hard-working Henry James who had grown up dumpster-diving for scrap metal with his father to make ends meet. Mr. Ruggs felt he was in charge of his younger brother since his older brother would work odd hours, often leaving Mr. Ruggs and his younger brother alone at night.

Outside of the house, Henry kept his focus on sports. Roderic pushed his friend — who demonstrated remarkable speed, agility, and jumping skills — to return to football after two years away from the sport. After all, Henry was good enough that the high school coaches repeatedly asked him to play for the team because they liked his fearlessness, athleticism, and competitive spirit. He initially declined because he didn't want to go back to the intense physical contact of football, and basketball was his sport.

But with plenty of encouragement from Roderic, who told Henry he was capable of making the NFL, and of the football coach, Henry agreed to give his high school football team a try for just one year. The results were almost immediate. A losing team the year before became a winning one, and Henry was quickly recognized as the school's best player. Remarkably, after just the second game he played for the team, Henry received a college-scholarship offer. Dozens more followed.

Things were looking good for his best friend, too. Roderic, who was a grade above Henry, accepted a basketball scholarship to attend Jacksonville State. But he never did.

On March 3, 2016, the best buddies planned to go to Birmingham to watch friends compete in the state finals. Ruggs was supposed to drive, but he came down with the flu, so Scott climbed into the backseat of a car with several other teenagers, including his friend Darian Adams, before falling asleep on a rainy morning. The car crashed.

As Henry wrestled with his illness in bed back home, he learned that his best friend had been transported to the Baptist Medical Center South hospital after the accident. His mother and brother were out with the family's truck, so the ailing Henry ran a mile to the hospital. On March 4, 2016, just eight weeks before Roderic would have turned 18, his life ended.

Henry's fiancée Kiara recounts...

Henry didn't talk to anyone for a week. He wanted me there, but we just sat there in silence.

Henry's great aunt Karen Matthews, who has long been a minister and a stabilizing force in his life, explains...

When his best friend died in a crash it hurt him quite a bit. They talked about everything together and planned for many things together. They were both athletes. They made a pact for life.

For years, Henry carried — and still carries — guilt over not being there that day. If he had been the driver, he is convinced, his best friend would not have died. At times, he wished he could trade places with Roderic. Rev. Matthews sought to help Henry process the loss, death, grief, and the role of God...

It brought him back to that place to deal with his emotions. It took quite a while. He was very hurt. He functioned but lacked some motivation. He still had determination, but it was with weight.

Henry eventually came to see his life as a tribute to his late friend. He would try to live up to Roderic's memory, and he has attributed his success in football to his late friend. The opening scene of the video in which the football phenomenon announced which

university he would attend, shows Henry at Roderic's grave. In the footage, Henry explains...

I honor him every day. ... Everything I am, everything I have, I honor his memory. Because he always told me, 'I will do something great. I will be something great.'

Those last two sentences are etched into Roderic's tombstone — and tattooed on Henry's leg.

In February of 2017, Henry agreed to attend the University of Alabama; it was the school that Roderic had encouraged him to select.

FAMILY BACKGROUND (Childhood Trauma)

That trauma was one of many in the life of Henry Ruggs III. He was born in Montgomery, Alabama, as one of six children (of several parents) connected by blood or marriages. In that family, there weren't many role models for traditional parenting.

His father, Henry Jr., age 53, was the seventh of 10 children in a Baptist family whose mother died in an accident when he was in 7th grade. Henry Sr., a hunter and fisherman who drove concrete trucks, tried to raise his large brood until he too died a decade later.

In such circumstances, Henry Jr. wasn't able to go to college. However, he did spend three years in prison in the early 1990s after he was arrested along with a man who was distributing drugs.

Two years after getting out of prison, Henry Jr. met Nataki Mumpfield, who worked at Regents Bank. She became Nataki Ruggs when they married in 1996. On Jan 24, 1999, Nataki gave birth to Henry, followed by Kevontae 14 months later. From birth until high school, Henry lived in the family's three-bedroom house in Montgomery where he shared a room with his younger brother Kevontae, while his older half-brother Darius slept in the third bedroom, and their parents filled out the rest of the space.

The family faced serious financial struggles while living in their simple home in the lower middle-class area of Normandale. But Henry grew up with plenty of friends around his age with whom he played ball in the street, rode bikes, and competed in football on a nearby field.

The boys helped take care of the house, did chores, cleaned the two bathrooms, and more. Some half- or stepbrothers would visit the house and even stay during the summer.

Dr. Karen Matthews, a full-time pastor with a doctorate degree in Theology and who teaches at the Montgomery Bible Institute and Theological Center, is Henry's great aunt. She provides counseling, skills training, community outreach, and other services at her non-denominational church. Rev. Matthews says that Henry was a timid, introverted, well-behaved, and diligent child who avoided trouble.

Faith was a key part of Henry's early upbringing. He would often stay with cousins and attend a Missionary Baptist church where his great aunt was a pastor. Later, as his home life sank into turmoil, the church was a rare constant for him as he would bounce from church to church depending on which family member or friend he was with on Sundays. Henry considered his great aunt, Rev. Matthews, at the main church he attended several times each week as a child, to be a "spiritual leader." She says that Henry was intrigued with exposure to the Bible and the Word, and that he loved the youth groups.

Even now, he turns to the scriptures to try to get him through these hard times, but as a child the church was a soothing place that allowed him an escape from his home life.

In his early childhood years, Henry says, he and Kevontae had healthy outlets outside their home thanks to friends and neighbors who paid the required fees so the two boys could compete in sports leagues. But the boys' parents argued over money and other things, and they tried to get the children to take sides. Nataki and Henry Jr. discovered they were not compatible as a couple. Henry Jr. tried to take Nataki to church, he explains, but he realized that she preferred to party with her single friends. To combat her anxiety and depression, Henry Jr. says, Nataki took pills, including Xanax.

When Henry was in elementary school, his parents divorced without telling their children why. Henry Jr. initially moved out of the house, but when Kevontae began acting out at school, their father moved back in after a few months. He promised to stay until the boys graduated from high school. This allowed the three children to remain together while keeping costs down.

Rev. Matthews, who ministered to her niece Nataki and Henry Jr., both individually and as a couple, said: "The kids had questions about it (trouble at home) but were never really sure what was going on."

It was an awkward situation. The divorced parents slept in different parts of the house and dated other people. Not surprisingly, communications between Nataki and Henry Jr. worsened. They rarely spoke except to argue and sought to avoid crossing paths, which proved impossible. The children were caught in the middle. At times, their mother would become angry, breaking things, and throwing objects, including at her sons, according to several family members.

Henry and Kevontae attempted to keep to themselves to avoid their parents' arguments, but when the situation got particularly bad, the boys tried to intervene. At such times, one of the parents invariably left the house for a time. Various family members and

other loved ones noted Henry's strained relationship with his mother. This was largely due, they said, to her narcissism, growing demands on her son, and ongoing descent into drug addiction.

Signs of trouble with Nataki emerged well before it became clear that her son was destined for football stardom. When Henry was very young, several family members explained, his mother started to act as though she was done taking care of others. Instead, she sought liberation from familial responsibilities so she could socialize, date, and get drunk and use drugs.

Nataki's impulses eventually drove her to lose contact with many relatives and friends because, as Henry explained, "she pushes people away from her." At the same time, as Henry's athletic star rose, Nataki increasingly demanded that he provide her with financial compensation for her years of mothering.

Schooling

Early on, teachers were very supportive of Henry. In elementary school, he was a good, diligent student who developed a strong rapport with them, and he took part in a program for academically gifted students. He dropped out of that program when it began to conflict with athletics. He did well in middle school, even though the discord at home prevented him from studying there.

When he matriculated into Robert E. Lee High School, which was across town with students from outside his neighborhood, Henry felt out of place. He had lost his sense of identity on several fronts. His teachers didn't seem to understand him, he had no friends at the school and the wealthier student body — in their trendy shoes and clothes — indirectly highlighted his poverty. He felt depressed and his grades suffered.

In 9th grade, he found some comfort in rediscovering Kiara — a girl he had met when they were 9 years old. She attended another high school, but they became inseparable friends. He also continued to spend a lot of time with Roderic, who went to another school.

Henry's situation began to improve in 10th grade. That year, Roderic transferred to Robert E. Lee High School and Henry's remarkable athleticism brought him acclaim on the basketball court where his dunking skills inspired the nickname "Sky High." The affirmation of students, teachers, and coaches gave Henry a boost of confidence that was soon followed by better grades.

That was also the year when he managed to escape the discord at his family home by moving in with his older brother. Henry and his little brother Kevontae only owned two school uniforms between them — and they couldn't afford more — so they couldn't possibly wash them frequently enough for school each day. Henry usually allowed his little brother to use the clean one, leaving the athlete to attend school in sweats, which

led to teachers ridiculing him. One of those teachers apologized to Henry years later, explaining that he didn't know how desperate his financial straits were at the time.

Others at the school recognized something special in Henry. Former Assistant Principal Chris Daniels, who has known Henry for the past eight years, wrote in an unsolicited testimonial...

Henry exemplified excellent character on a daily basis. He was respectful, trustworthy, courteous, and extremely humble. Though Henry often stayed to himself, he would never hesitate to help a staff member or student. He has always put everyone before himself to make sure they were okay.

Henry felt fortunate to have good and generous friends. Roderic and Kiara both provided moral and material support he lacked at home. Demitria Kilgo Washington, who is the mother of Kiara and two other daughters — and who has worked on a Hyundai production team — recalls providing Henry with money for clothes, his yearbook photos, and other things. “The boys were always hungry,” she explained. “So, I started feeding him every day.”

In 11th grade, the high school football coach who had begged Henry to join the team, changed tactics, challenging him by saying that someone so (relatively) small couldn't possibly make it as a football player. Roderic pushed Henry to “go show them” what he could do — just for a year. Eventually, Henry joined the team and instantly became its star player.

As university scouts started to woo him, Henry discovered that he and his little brother could eat better — and overcome food insecurity at his older brother's apartment — by going to sporting events and dinners hosted by scouts.

At school, meanwhile Henry was earning good grades. Beloved by teachers and coaches at his sports-crazy institution, it became increasingly clear that football stardom might be in his future. After receiving about 30 scholarship offers, Henry signed with the University of Alabama.

Rick Arnold, a high school teacher who met Henry as a freshman at Robert. E. Lee High, wrote a letter highlighting the boy's resilience in the face of profound hardship...

Henry Ruggs III had every opportunity to throw in the towel, walk away and leave everything he had accomplished athletically and academically when his friend, confidant, “hooked at the hip” buddy, Rod Scott passed away. Instead, this event added fuel to Henry's fire to succeed. He not only stepped up personally, but he also made it his mission that Rod would not be forgotten. Whether through continued contact with the Scotts or “throwing up a three” (Rod's

basketball number), Henry did everything possible to have Rod follow in a journey that Rod was partially responsible for...

Henry and Kiara's relationship matured. From early on, Henry would watch Kiara's volleyball games and she would attend his basketball and, later, football matches. And when Henry wasn't involved in sports, he was usually with Kiara.

In difficult times, she repeatedly proved to be a light in his life, even if they had almost diametrically opposite personalities. Henry is introverted and seldom speaks in certain social situations, while Kiara is outgoing and warm. He was smart, albeit not particularly studious, while she was a bookworm on the honor roll at school.

She was there for him during a slew of traumatic events that took place during his high school years, as well as others later on. In high school, this included his mother and father's troubled relationship, Nataki's drug use and neglect, Henry's move to get away from his parents, and the sudden death of Roderic. The following year, when Henry was in 12th grade, his oldest half-brother Courtney was shot in the head.

Henry went through additional traumatic experiences, both before and after those events. Henry remembers growing up next door to a white male neighbor with a confederate flag in the front yard. Among other things, the neighbor would gratuitously call the police to report the Black children outside for making too much noise in the street. There was a flurry of other destabilizing events, including:

- A destructive tornado when he was in early elementary school;

- A fire in the family home a few years later that forced them to move in with various relatives for a time;

- A childhood car accident when his mother was driving;

- Concussions, one while playing basketball when he was 14, two others while playing football in college and then in the NFL.

Amid such challenges, Henry and Kiara became a couple, and they quickly concluded that their relationship would last. Henry says that the feeling has never changed, and that he felt — and still feels — closely connected to her family, as well.

After Henry and his brother finally moved back to their mother's place during his senior year, Henry would sometimes escape from the still-unpleasant home situation by staying at Demitria's house where he could enjoy love, stability, and a more conventional family. Demitria recalls...

- We introduced Henry to Christmas, holidays, birthdays. He would sit around and watch everyone open a gift, and he had a gift. He was

really surprised because he didn't have this experience before.

Later on, when Henry returned to Montgomery from college, he would stay with Kiara's family — not with his own mother. The distance from Nakita helped him to comprehend how detrimental her substance abuse had become. He explains...

When I was a kid, I didn't understand. Even in high school, I knew something was wrong but didn't really understand it.

By that time, his mother's efforts to fend off anxiety and depression through alcohol and pills were failing as she became less functional and started to miss work.

Demitria says Henry's mother confided in her that she was clinically depressed and suffers from bipolar disorder. Demitria said of Nakita: "Some days she was okay, and others she wasn't."

Demitria says that when Henry's parents argued, it was usually his mother who initiated the fights. On a different front, Demitria said that Henry's mother was never particularly engaged with her son's athletics; she only cared about what her kids could do for her. But if her son's athletic abilities brought money, she felt that he must pay her back for all she had done for him.

On the night of the draft, Demitria recalls, Nakita insisted that the family celebrate at her place. She turned it into her moment. Just after the event, though, Henry returned to Demitria's home where he was staying at the time. Demitria relates...

He was always trying to please her. He was a mama's boy. But he never got her approval.

A Football Star

After deciding to play for the powerhouse Crimson Tide at the University of Alabama, Henry was simultaneously nervous about competing at the nation's #1 football school, but excited to attend college with good friends — DeVonta Smith and Jerry Jeudy — who were also wide receivers on the team.

That first year, Henry didn't begin as a starter and had to earn his time on the field. By the end of the season, he had scored the most touchdowns even though he and his two friends were all good enough to become pros. (Smith is on the Philadelphia Eagles and Jeudy for the Denver Broncos.)

Henry's life was on solid footing — he quickly earned a spot on the Dean's list at the U of Alabama, and Kiara visited from Paine College to join him and attend games.

Teacher Rick Arnold explained that Henry's focus and dedication stood out at school....

It was immediately obvious that Henry was not going to give anything other than 100% of his ability, whether academic or athletic. He poured everything he had into every situation that he faced. This led to a gifted and talented tag in the classroom at a school where unfortunately that was the extreme[ly] rare exception, not the rule, and a high school athletics career that astonished those in his presence and attracted attention throughout the country.

Late in his junior year, Henry declared for the NFL draft. The Las Vegas Raiders selected him as the top wide receiver of 2020, using the 12th overall pick. The contract he signed guaranteed him \$16.67 million over four years. (The Raiders would later void the deal during his second year.)

While that money didn't change Henry much, Demitria noted that it transformed his mother's visions of her own future. She made clear that she intended to move to Las Vegas with Henry. She told people that he would buy her a new car and fund her life there.

Family Burdens

Latavius Powell is the owner of the CSG Wealth Management firm and Henry's financial advisor. The Atlanta-based Powell has a dozen years of experience in helping such clients with budgeting, credit, investments, tax planning, and other money-management needs.

Powell, whose client base is primarily made up of professional athletes, met Henry before he was drafted. With a multimillion-dollar contract looming, Henry chose Powell because he doesn't fawn over his clients and emphasizes an honest assessment of circumstances when it comes to credit, taxes and spending.

Powell recalls that Henry did his homework and research, and that he was sharper than most athletes, as well as hungrier to learn. He recalls...

Henry was very quiet and listened more than he spoke. Then he went back to do his own research and make his decision. He wasn't caught up in the fanfare of pro sports. He didn't even realize how good he was. Up until the very end, he was planning to go back to school.

Powell notes that the situation with Henry's mother was complex. His mother had planned to spend money from Henry's first contract well before he was drafted. For athletes from needy families, the financial pressures can seem overwhelming. Powell explains...

He bought his mom a new car, a brother a truck, his dad a car, his little brother a car. [But] once you say 'no,' they don't take it well.

In Henry's case, his mom plays on his heart strings. Everything is highly emotional. She starts crying and gets manipulative.

The complex dynamic goes back to Henry's teen years when his mother "pretty much gave him up," Powell says. He continues...

Then when he made it, she wanted the fanfare, but she wasn't supportive. She didn't always come to his games or genuinely support him, but she had all these expectations.

Once Henry began to earn an NFL salary, most conversations between him and his mother "ended up being about money." This is common for many athletes from low-income families in which "all the wealth is new wealth," Powell explained.

It wasn't just Henry's mother. One of Henry's brothers told Powell that the NFL signing bonus should be divided up among various family members with each parent receiving a half-million dollars and each sibling getting \$250,000. Powell recounts...

It was an ignorant conversation. He didn't understand the taxes they take, and all the people — like agents, etcetera — that have to get paid.

The entire family, in such circumstances, knows who the big money-earner is, and they all call on you over and over. "It is," Powell explains, "very draining.

Powell recalled the first time he met Henry's mother. He delivered a presentation of suggested financial planning to help her son. He states...

Nothing stuck. At the end of the meeting, she talked about living her life and partying. There were drug issues in the home — street drugs and prescription pills.

He continues...

She is a party girl. She loves to party. When he was first drafted, his mom started dating one of the neighbor kids about Henry's age. He was a drug dealer, supplying her with drugs. His intention was to get access to Henry's money.

Powell says Henry's mother is bipolar, which explains why her son could never do enough...

She would contact me to say that she was planning to buy a multimillion-dollar house with Henry's money.

Kiara suggests such pressure became the norm, explaining....

Every conversation was about her wanting him to buy her something. He built up a wall to hide his feelings.

She wants him to take care of her. ... She expects him to give her money. At first, he would give her money but after a while he would only give her money for necessities because she would spend money carelessly.

Despite the addiction in his family, Henry didn't like the taste of alcohol, seldom drank and did so in moderation. When going out with friends, he was typically the designated driver. He says he can count on two hands the number of times he has been drunk in his life. He has worked to be a pillar of responsibility in a destabilized family and encouraged family members to sober up and stop consuming drugs. On the few occasions when Henry later ingested alcohol, he tended to consume sweet beverages that masked the taste of liquor, his longtime girlfriend noted, explaining that she could always out-consume him because he never really learned how to drink.

In addition to his dislike of the taste and his disillusionment with his family over drugs and alcohol, Henry also avoided substance abuse because it undermined the focus necessary for his football career.

After he was selected to join the Raiders, it became clear to Henry that he could lose everything in a moment. While moving out of the dorms in 2020, Kiara's father backed a moving truck with an attached trailer into Henry, puncturing his thigh and sending him to the hospital. Doctors kept Henry there for two days and warned that it could have caused permanent damage if it were in a slightly different spot, which could have precluded a career in professional football.

During his rookie year in the NFL, Henry, who always excelled on the field, "was disappointed by his performance his first year with the Raiders" after the team's general manager voiced displeasure with the entire rookie class. But he returned to the field for his second year better than ever despite the many familial and professional pressures he was under.

Testimonials on Behalf of Henry Ruggs III

Former educators, coaches and school staff have written unsolicited letters in support of Henry's character, values, and kindness during his high school years and beyond.

Alabama state Rep. Phillip Ensler (District 74) met Henry in 2012 when he was a 9th grade student at Robert E. Lee High School in Montgomery, and Ensler served as a

Teach for America corps member. He recalls...

Henry was always a leader amongst his peers and mature beyond his years. He was immensely driven, focused, and humble — an impressive set of characteristics for a young man of his age. This was even more admirable considering the challenging circumstances and distractions surrounding him. Many of our students grew up experiencing the evils of poverty, gun violence, and lack of access to basic, necessary services. Yet Henry was steadfast in his determination to overcome these barriers and achieve his college and career goals.

Rep. Ensler wrote of Henry's acceptance at the University of Alabama and his tenure there as a student-athlete being both an individual and a community inspiration back in Montgomery...

He represented the best of our city — he was our beloved son who made us so proud. He carried the weight of lofty expectations with the same humility and maturity he displayed since his adolescent years.

When he was then selected in the NFL Draft, many of us wept tears of joy — his success gave so many in our community a deep sense of hope and promise.

This was despite great challenges, Rep. Ensler explains...

The Lee [high school] family has tragically lost multiple students in recent years — including four-star athletes — and multiple faculty from horrific deaths, including Henry's close friend, Rod Scott. We then lost Rod's father, who was one of Henry's high school coaches, to the COVID-19 pandemic.

This amount of trauma would understandably be unbearable for most people to deal with. Many would collapse under such enormous emotional pain, while also having such a high-profile, high-pressure career. Henry, though, felt the best way to honor their lives was to keep doing his best. He wanted to continue to make them proud and continue to do what he has always done, be a source of goodness to our community. His ability and willingness to do this speaks to his selflessness and deep sense of responsibility.

Michael Locksley, the head football coach at the University of Maryland and former coach of Henry, as well as his mentor for the last half-decade, writes...

As someone who worked tirelessly with Henry on and off the field as he navigated college and beyond, I am of firm belief that Henry's recent decisions and actions are contrary to his disposition in life...

Ruggs' hardworking and positive demeanor is what attracted me to him as a coach. He is what every coach should want. He approached everyday with incredible toughness, effort, resiliency, and pride in everything he did. ... Beyond his life in college, Henry is a man committed to taking care of his daughter, his family, and his community.

Coach Locksley noted his own traumatic experience involving the violent loss of his child as he sought to process what occurred in this tragedy involving someone he cares deeply about...

As a parent who lost their child to gun violence, I have empathy and deep compassion for the victim's family and loved ones. Henry's actions are inexcusable and resulted in the gravest consequences.

I know this incident is particularly draining and having detrimental effects on Henry, as this hits close to home. ... He had turned that survivor's guilt [over the loss of Roderic] into passion and giving his everything every day as if it was his last.

I have been coaching for nearly 30 years and have made it my mission to treat these students like they are my own sons and utilize my time with them to help them become better men for their families and communities. I know the type of person Henry is, he will use every moment he has on this Earth to right this wrong by educating and trying to prevent others from making these same mistakes.

Chris Daniels, the assistant principal at Robert E. Lee High School, who has known Henry since he was a 15-year-old student, wrote in his letter...

Over the years, I have seen him grow from a teenager walking the hallways to a man that values his family and others. He has come back to the school over the past years and donated to the less fortunate as well as the athletic teams. Henry has also taken time to mentor students at school and be a pillar in the community. I have often thought of Henry as a son of mine because of the way he carries himself.

Tiffani Cain, the payroll clerk at Robert E. Lee High School who met Henry at the start of his freshman year, recalled...

His participation in school and extracurricular activities are often referenced to current students as a blueprint on how they too could be successful and a responsible member of not only the student body of Robert E. Lee High School, but society.

Henry earned the privilege of being an office aide during his senior year. This honor is granted only to those students that have shown outstanding attributes in their academics, character, ethics, and leadership abilities throughout their previous years at Lee [High School]. His professionalism and hardworking traits represented his character.

During and after high school, Henry would often send words of encouragement to students at Lee HS and be available to spend time with the youth of Montgomery mentoring and offering support during difficult times. He has remained humble and approachable through his various successes. ... His generosity to children in the community goes above and beyond. Henry is looked at very highly by not only his peers but the community as a whole.

Frank Carr, an IT Instructor at Robert E. Lee High, who met Henry in high school, wrote...

Henry has always been a respectful, trustworthy, humble, dedicated and hardworking man. Regardless of the task he always puts 110% of his time and dedication to that task. ... He is the model student athlete and his grades reflected this even when he entered the NFL draft. He wouldn't want me to say it, but Henry is definitely a computer geek.

As a community leader, before the world knew his name, he was already a mentor to younger kids in the community letting them know that in order to be successful in life you have to work hard and stay focused on your dreams. Coming home and speaking to our students is a priceless tool that a teacher has to motivate the youth and Henry never declined an opportunity to stop in and help us in that area. ... [H]e always made time for his Lee family and the city of Montgomery.

Sherron Fantroy, who teaches advanced writing and literature at Lee High School, describes Henry as a "very considerate and responsible young man" who is family-oriented, active in the community, and in his church. She notes that the "quiet-natured" Henry "has a general love and respect for those around him and strangers," adding...

[Henry] is a quiet motivator, he has an aura around him that encourages others to be their best without settling for less. He motivates others by doing and he encourages as he motivates. Henry's sincere, humble personality far exceeds his talent and his persona as an athlete. Very few athletes of Henry's caliber can maintain a modest composure, but Henry has a sincere, genuine personality. He has helped many people, served his community, and represented his loved ones, family, friends and others with the utmost respect.

Henry has a reason to not only win, but he has a deep-seated, heart-connected friendship with an old friend that gives him the inner push to do and be better. It is this friendship that inspires and propels him forward. He seeks to honor the memory of his friend with his life and I know he wants to continue to honor this friendship. I have every confidence that Henry is a genuine person of morals and respect and he will continue to live this way.

Willard McFeely, who was president of the football booster club at Henry's high school, noted...

I have always known [Henry] to be a very focused, disciplined, and caring young man. He always had good grades and was always the first to help when I needed assistance. During his senior year, the football team was ruled ineligible for the playoffs because of an illegal player. A lot of people were in his ear telling him not to worry about it because he had his scholarship to the University of Alabama. Henry, being the leader that he is, took control of the team and even stepped in and played quarterback for the rest of the season because of an injury to his teammate. This is an example of how he strived to make others better rather than thinking of himself.

While attending the University of Alabama as a student athlete and, up until this incident I have always been in touch with Henry and have not known him to be anything but upstanding, I believe this incident was a moment of bad judgment on his part. I know he is deeply regretful of this unacceptable behavior that resulted in the loss of a life.

I would request at this time for leniency in his sentencing. I believe that by him sharing his story, it would help others make a positive change in their lives.

Patricia Mohammed, who has taught high school English for 23 years, wrote of Henry...

In a high school, reputations are established and hard to change. In Henry's case, he was consistently spoken well of on the field or court, as well as off of it. His reputation was and still is that of a gifted and humble young man.

As Henry's star continued to rise, we all watched with pride as he remained grounded in the face of increasing praise, which would have warped one of lesser character. As he returned to visit his Lee "FamiLee," he humbly listened as we questioned him about everything from his adjusting to campus life, attending class and playing in Bryant-Denny Stadium. His demeanor remained that of a grateful and focused young man which only solidified his place in our hearts and expanded his fan base. In a time of overexposure and an ever-increasing parade of attention-seeking and self-promoting individuals, it was a pleasure to know that we could point to Henry as an example of goodness inside of greatness.

Whitney S. Walker, Ed.S, who began to teach English in 2016, but struggled in that first year after giving her first Algebra I exam to students. She recalled...

That afternoon after school, I sat in my classroom with tears rolling down my face because I was so disappointed in my students' test results. I truly wanted to quit teaching at that moment... Henry walked by my classroom, saw me crying, and came in and decided to offer some positive advice. In retrospect, it is quite admirable that a 17-year-old could encourage me to keep going and not to give up.

This was the day I knew that Henry was exceptional.

From that day on, Henry would help me in any way he could. He would aid in grading papers if I needed it, assist my ninth-grade Algebra I students with their assignments, express the importance of schoolwork to those students that slacked, and would simply stop by my classroom to make sure that I was okay. I was impressed to learn that this four-sport athlete maintained A's and B's (mostly A's) and would accept nothing less. Henry was the true definition of a role model.

I would overhear classroom conversations that made it clear that my students looked up to him. He embodied the role of leadership on the field, court, track, and in the classroom. During his senior year, Henry led the school basketball team in dunks, the football team in receiving yards, and broke the 7A state record in the 100-meter dash in track and field.

Henry is one of the most hard-working, passionate, honest, dependable, and caring individuals that I have had the pleasure of meeting over the years. As I have completed five years as a math teacher at Lee High School, I can say without a doubt that Henry is the most outstanding student and athlete that I have encountered. His character goes well beyond what he can do academically and athletically — evident the first time I met him.

After high school, Mrs. Walker added...

Henry became a community leader who gives back to Robert E. Lee High School and the Montgomery community. Before his first football game as a Las Vegas Raider, Henry became involved in the Las Vegas community as well, donating over 3,000 meals to Three Square Las Vegas.

Despite the unfortunate circumstances that bring this letter about, I can attest that Henry Ruggs, III is still the honorable community leader and noble human being I met more than five years ago.

As for Henry, he expressed deep remorse about this avoidable tragedy. He explains...

I feel for the victim's family and for anyone who knew her. I would do anything I could to help her family; whatever they want.

On one level, Henry knows there is nothing he can do to bring Tina Tintor back, and that, "It's no longer about me at this point." On another level, he sees his own story as a cautionary tale that might help to spare others from a similar fate.

In an unsolicited letter to the Court, Henry's high school teacher Rick Arnold wrote...

I am not an empathetic individual. It is my point of view that no one, including myself who lost a sibling in an automobile accident, can understand the feelings involved with all the people touched by this tragic accident. However, I am extremely sympathetic towards all involved. I look back at all the opportunities I had as a young adult and realize that it was either by luck or the grace of God that I didn't have to experience what will take place in your courtroom.

I do know that given a glimmer of opportunity that Henry Ruggs III will, without a doubt, accept the decision toward his moment of poor judgment. Given the opportunity to ease the feelings of all involved, Henry Ruggs III will mentally and physically spend every chance given to lead the way in attempting to correct his wrong. It is my belief that any other decision would be adding to the loss that this

situation has already created.

As for Henry, he deeply laments what happened...

I personally understand that this is a very tragic situation being that I lost someone I loved to a car accident. I can understand what the family is going through. I also have learned that all of my choices can affect someone else, even people I don't know.

He adds...

When this is all behind me, I would like to tell my story to young high school and college athletes; tell them how easily something like this can happen if you drink and drive. You have to live with your decisions and consequences can destroy your life, as well as another's life.

I'm incredibly sorry for this happening. The family lost a loved one in a very tragic way, and they were forced to become involved in a situation that never should have happened.

CONCLUDING REMARKS

Henry had overcome extreme financial deprivation, childhood hunger, housing insecurity, an absentee and addicted mother, a conflict-ridden divorce that destabilized her children, the descent of his little brother into substance abuse, the near-fatal shooting of another brother and the shooting of a former teammate — not to mention the death of his best friend and others.

By numerous accounts, Henry — who has no criminal record — has been a pillar of support to family members, friends, his church, his schools, and the communities where he lived. Alabama State Rep. Ensler addressed Henry's childhood in Montgomery...

I am not sure how a person of any age — let alone a 22-year-old — could carry himself with such poise. Perhaps he was given these superhero qualities so that he could be a source of strength for a community that has suffered so much.

Henry's case is especially sad considering the aberrant nature of his actions. His life and career paint a portrait of a man who grew up in a very modest home, wrestled with various forms of trauma, and rejected drugs and gangs — even as his mother swore off her responsibilities and engaged in out-of-control partying.

Prior to the day of this tragedy, Henry exemplified responsibility. Through their letters, his high school teachers, staff, and coaches have provided numerous examples of Henry's contributions to his school, church, and community. He did so as a teenager and young adult caretaker for his younger brother and later to other members of his family.

Henry will carry the grave weight of his actions with him for the rest of his life. He understands there is nothing that he can do to undo this tragedy. But he will make amends in any ways available to him.

His story — as a star athlete who succeeded despite enormous obstacles before self-destructing — can act as a cautionary tale for young athletes and others facing peer pressures around alcohol, drugs, cars, and speeding.

In his letter, Alabama State Rep. Ensler offered compassion for the loved ones of Ms. Tintor...

I cannot imagine the overwhelming pain and horror that the family and friends of Tina O. Tintor are feeling from losing her so suddenly and too soon. My heart and deepest sympathies continue to be with them.

But he expressed hope that Henry will be able to do something constructive going forward...

While Henry's story has all the markings of a Greek tragedy — the dramatic downfall of a hero and the painful loss of a precious human life — this need not be the end of the story for this young man who has been a gift and blessing in the lives of many.

If there are any questions related to this report, please feel free to contact me. Very truly yours,

Dr. Sheila Balkan

Sheila Balkan, PhD
Criminologist

**EXHIBIT
B**

November 15, 2022

To whom it may concern,

I have known Henry Ruggs for the past 8 years. He was one of my former students at Robert E. Lee High School where I was formerly an Assistant Principal. While he was at Lee High School, Henry exemplified excellent character on a daily basis. He was respectful, trustworthy, courteous, and extremely humble. Though Henry often stayed to himself, he would never hesitate to help a staff member or student. He has always put everyone before himself to make sure they were okay.

Over the years, I have seen him grow from a teenager walking the hallways to a man that values his family and others. He has come back to the school over the past years and donated to the less fortunate as well as the athletic teams. Henry has also taken time to mentor students at school and be a pillar in the community. I have often thought of Henry as a son of mine because of the way he carries himself.

Again, I would like to stress the positive impact Henry has had on the staff, students, and the community of what we have grown to call "Fami-Lee!"

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Daniels", with a long horizontal flourish extending to the right.

Chris Daniels
Former Asst. Principal
Robert E. Lee High School

**EXHIBIT
C**

12.07.2021

Re: Character Statement on Behalf of Henry Ruggs III

Your Honor:

It is with a heavy heart that I am writing this letter on behalf of Henry Ruggs III as a reference to the character of the young man. I am fortunate to have known Henry since his freshman year at Robert E. Lee High School, Montgomery, Alabama. I was a teacher at the school and heavily involved with both the football and basketball programs. While our interactions were mainly through athletic endeavors, I was also involved with many experiences throughout academic and personal interactions with the young man.

It was immediately obvious that Henry was not going to give anything other than 100% of his ability, whether academic or athletic. He poured everything he had into every situation that he faced. This led to a gifted and talented tag in the classroom at a school where unfortunately that was the extreme rare exception, not the rule and a high school athletics career that astonished those in his presence and attracted attention throughout the country. While the later is a gift of God, Henry took that gift and raised the bar to levels never seen in this area. It didn't matter the event he was challenged with or how long it had been since his last efforts in the skill, Henry was all in.

Henry Ruggs III had every opportunity to throw in the towel, walk away and leave everything he had accomplished athletically and academically when his friend, confidant, "hooked at the hip" buddy, Rod Scott passed away. Instead, this event added fuel to Henry's fire to succeed. He not only stepped up personally, but he also made it his mission that Rod would not be forgotten. Whether through continued contact with the Scott's or "throwing up a three" (Rod's basketball number) Henry did everything possible to have Rod follow in a journey that Rod was partially responsible for. Rod was persistent Henry "try" football.

There were learning moments as well. As with any young person they may not always see things as intended by authority figures. The difference between Henry and most of the young people in his environment was while possibly disagreeing with an individual's view, he would look them in the eye, listen to their point of view and accept the fact that looking at something in a different light made sense or possibly just agree to disagree. I never saw Henry change a relationship with an individual because of opposing points of view.

I am not an empathetic individual. It is my point of view that no one, including myself who lost a sibling in an automobile accident, can understand the feelings involved with all the people touched by this tragic accident. However, I am extremely sympathetic towards all involved. I look back at all the opportunities I had as a young adult and realize that it was either by luck or the grace of God that I didn't have to experience what will take place in your courtroom. I do know that given a glimmer of opportunity that Henry Ruggs III will, without a doubt, accept the decision toward his moment of poor judgement. Given the opportunity to ease the feelings of all involved, Henry Ruggs III will mentally and physically spend every chance given to lead the way in attempting to correct his wrong. It is my belief that any other decision would be adding to the loss that this situation has already created.

With Best Regards,

Rick Arnold,
Park Crossing High School
Montgomery, AL



**EXHIBIT
D**

REPRESENTATIVE PHILLIP ENSLER, ESQ.

[REDACTED]
MONTGOMERY, AL

November 13, 2022

Dear Judge Walsh:

I am writing with a slightly updated letter from my original December 2021 letter to share my personal knowledge of the upstanding character of Henry Ruggs III.

Although I am now a member of the Alabama House of Representatives and a licensed attorney in Montgomery, AL, I first encountered Henry in 2012 when he was a 9th grade student at Robert E. Lee High School in Montgomery, AL, where I served as a Teach for America corps member. Henry was always a leader amongst his peers and mature beyond his years. He was immensely driven, focused, and humble – an impressive set of characteristics for a young man of his age. This was even more admirable considering the challenging circumstances and distractions surrounding him. Many of our students grew up experiencing the evils of poverty, gun violence, and lack of access to basic, necessary services. Yet Henry was steadfast in his determination to overcome these barriers and achieve his college and career goals.

Henry's acceptance to the University of Alabama and his tenure there as a student-athlete was not only an individual accomplishment, but an inspiration to the community in Montgomery. He represented the best of our city – he was our beloved son who made us so proud. He carried the weight of lofty expectations with the same humility and maturity he displayed since his adolescent years. When he was then selected in the NFL Draft, many of us wept tears of joy – his success gave so many in our community a deep sense of hope and promise.

This was not always easy. The Lee family has tragically lost multiple students in recent years—including four star athletes—and multiple faculty from horrific deaths including Henry's close friend, Rod Scott. We then lost Rod's father, who was one of Henry's high school coaches, to the COVID-19 pandemic.

This amount of trauma would understandably be unbearable for most people to deal with. Many would collapse under such enormous emotional pain, while also having such a high-profile, high-pressure career. Henry, though, felt the best way to honor their lives was to keep doing his best. He wanted to continue to make them proud and continue to do what he has always done, be a source of goodness to our community. His ability and willingness to do this speaks to his selflessness and deep sense of responsibility.

I am not sure how a person of any age—let alone a 22 year old—could carry himself with such poise. Perhaps he was given these superhero qualities so that he could be a source of strength for a community that has suffered so much.

I cannot imagine the overwhelming pain and horror that the family and friends of Tina O. Tintor are feeling from losing her so suddenly and too soon. My heart and deepest sympathies continue to be with them.

REPRESENTATIVE PHILLIP ENSLER, ESQ.


MONTGOMERY, AL

While Henry's story has all the markings of a Greek tragedy—the dramatic downfall of a hero and the painful loss of a precious human life—this need not be the end of the story for this young man who has been a gift and blessing in the lives of many. He has overcome too much for this to be the end. I am confident that if you use your discretion to give him a second chance, he will make you proud.

Sincerely,

Phillip Ensler

Rep. Phillip Ensler (AL House District 74)

**EXHIBIT
E**

Michael Locksley

December 8, 2021

Re: Henry Ruggs III

To The Honorable Judge

I am writing on behalf of Henry Ruggs III, I am a former coach and have been a mentor in his life for the last 5 years. As someone who worked tirelessly with him on and off the field as he navigated college and beyond, I am of firm belief that Henry's recent decisions and actions are contrary to his disposition in life.

Ruggs' hardworking and positive demeanor is what attracted me to him as a coach. He is what every coach would want. He approached everyday with incredible toughness, effort, resiliency, and pride in everything he did. These characteristics were not just apparent on the field, Henry committed to excellence in the classroom as well. Beyond his life in college, Henry is a man committed to taking care of his daughter, his family, and his community.

As a parent, who lost their child to gun violence, I have empathy and deep compassion for the victim's family and loved ones. Henry's actions are inexcusable and resulted in the gravest consequences. I know this incident is particularly draining and having detrimental effects on Henry as this hits close to home. His best friend, and for lack of better words, brother, was killed in a car accident in high school driving to a game. Henry would have been with his friends in that car had he not fallen ill. He had turned that survivors guilt into passion and giving his everything everyday as if it was his last.

I have been coaching for nearly 30 years and have made it my mission to treat these students like they are my own sons and utilize my time with them to help them become better men for their families and communities. I know that the type of person Henry is, he will use every moment he has on this Earth to right this wrong by educating and trying to prevent others from making these same mistakes.

I appreciate you taking this moment to allow me to share what I know to be true of Henry Ruggs III as a humble young man, who works hard in every aspect of his life, who loves his family, and shares his passion for happiness with anyone who he encounters. I hope that my letter will act as a positive and contributing factor when the court considers his case.

Sincerely,



Michael Locksley

**EXHIBIT
F**

Robert E. Lee High School

225 Ann Street
Montgomery, AL 36107
Ph: 334.269.3742, opt. 3
Fax: 334.269.3888



December 6, 2021

To Whom It May Concern,


It is my great honor and privilege to write this letter in reference to Henry J. Ruggs, III.

I have had the pleasure of knowing and observing Henry since August of 2013 when he was first enrolled at Robert E. Lee High School in Montgomery, AL. During his time at Lee High School, Henry always conducted himself with the highest level of integrity in everything he did. His participation in school and extracurricular activities are often referenced to current students as a blue print on how they too could be successful and a responsible member of not only the student body of Robert E. Lee High School but society.

Henry has shown himself to have valuable leadership skills as an athlete and as a student. At his time at Lee, Henry earned the privilege of being an office aide during his senior year. This honor is granted only to those students that have shown outstanding attributes in their academics, character, ethics and leadership abilities throughout their previous years at Lee HS. He took his responsibilities as a student office aide very seriously and works diligently during his scheduled time in the office. He also volunteered with various activities at Lee HS. Over time, I grew to depend on Henry and he always went above and beyond my expectations. His professionalism and hardworking traits represented his character.

During and after high school, Henry would often send words of encouragement to students at Lee HS and be available to spend time with the youth of Montgomery mentoring and offering support during difficult times. He has remained humble and approachable through his various successes. Always ready to smile and lend a helping hand. His generosity to children in the community goes above and beyond. Henry is looked at very highly by not only his peers but the community as a whole.

Sincerely,


Tiffani Cain

Robert E. Lee High School

Payroll Clerk

**EXHIBIT
G**



Robert E. Lee High School

225 Ann Street • Montgomery, AL 36107

334.269.3742 • Office
334.269.3888 • FAX

To whom it may concern

I wanted to take a moment to speak about a young man that I know and love. As a parent I have learned to hold my kids high when they are doing things that require praise and extend a hand to pick them up when they fall. Now is one of the only times that I can recall having to extend that hand for Henry. Even though Henry has a paternal father, he has a few men that consider themselves his father as well. At Robert E. Lee High School we have embraced the fact that it takes a village to raise a child and that process doesn't end when the kid graduates from high school. I met Henry when he was a senior and have been in contact with him even today. My job as an instructor is to not only give the information that's on the lesson plan, but also give them the knowledge, skills and abilities necessary to be successful in life. Henry has always been a respectful, trustworthy, humble, dedicated and hardworking man. Regardless of the task he always puts 110% of his time and dedication to that task.

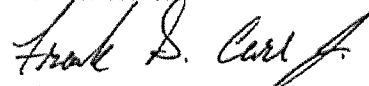
Regardless of the attention that he has gotten as an athlete, many people don't know the whole person named Henry James Ruggs III. Henry is a completer of the Robert E. Lee High School Information Technology Academy, where he learned several different aspects of computer technology, which translated to a great college experience in the classroom. While other people talked about football and the touchdowns that he caught, I always asked how classes were going and later on how he was doing as a person because that has always been more important. He was one of those students that didn't struggle when it came to grasping the information that I gave to him. He is the model student athlete and his grades reflected this even when he entered the NFL draft. He wouldn't want me to say it, but Henry is definitely a computer geek.

As a community leader, before the world know his name he was already a mentor to younger kids in the community letting them know that in order to be successful in life you have to work hard and stay focused on your dreams. Coming home and speaking to our students is a priceless tool that a teacher has to motivate the youth and Henry never declined an opportunity to stop in and help us in that area. Financial support is one aspect to giving back to the community, but it is my personal opinion that when you give your time that is more valuable than money and he always made time for his Lee family and the city for Montgomery.


As an all-around person Henry is a great person that so many people look up to and look to for motivation and uplift. There is nothing more a parent can ask for from a child than to go out and reach for the stars and live out your dreams. There have been several things that has happened in his life that he has to carry with him every day, but knowing that God won't put more on you than you can handle is one of the ways that I know that he has continued to push forward. My motivating bible verse that I share with my students comes from Philippians 3:14: I press toward the mark for the prize of the high calling of God in Christ Jesus. Those words are so very important to me and I think that they continue to help people especially when things aren't going as planned. I have always told Henry to stay focused, and I love him, and I say the same thing to him even now.

Thanks for allowing me the opportunity to give a little insight into the person that we know and love name Henry James Ruggs III.

Frank S. Carr Jr



Robert E. Lee High School
Information Technology Academy Instructor



December 5, 2021

**EXHIBIT
H**



Mrs. Sherron Fantroy
Robert E Lee High School
225 Ann Street * Montgomery, Alabama



06 December 2021

To Whom It May Concern:

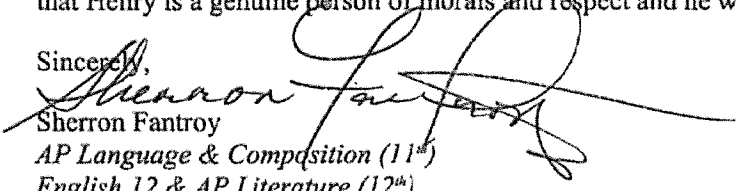
I am writing on the behalf of Henry Ruggs. Henry is a very considerate and responsible young man. He is family oriented, active in the community, and active in his church.

Henry is contemplative. He is typically the person who thinks before he acts. Although we all make mistakes, Henry is the type of person who considers others in his actions. He is a person who takes into account what he wants, comes up with a plan of action, and follows out his plan until the end. Although Henry enjoys his family and friends, he is a quiet-natured person with self-control. Henry has a conscience, he has a general love and respect for those around him and strangers. He is a young man who can learn from mistakes. He is not a person who has to make mistakes repeatedly before learning a lesson, he can learn after the first time, which is evident in his relationships, his work ethic, and his competitive spirit.

Henry is a motivator. There are some people who push others to action with all talk, however, Henry is not that person. He is a quiet motivator, he has an aura around him that encourages others to be their best without settling for less. He motivates others by doing and he encourages as he motivates. Henry's sincere, humble personality far exceeds his talent and his persona as an athlete. Very few athletes of Henry's caliber can maintain a modest composure, but Henry has a sincere, genuine personality. He has helped many people, served his community, and represented his loved ones, family, friends and others with the utmost respect.

Last but not least, Henry has a reason to not only win, but he has a deep-seated, heart-connected friendship with an old friend that gives him the inner push to do and be better. It is this friendship that inspires and propels him forward. He seeks to honor the memory of his friend with his life and I know he wants to continue to honor this friendship. I have every confidence that Henry is a genuine person of morals and respect and he will continue to live this way.

Sincerely,


Sherron Fantroy
AP Language & Composition (11th)
English 12 & AP Literature (12th)
Key Club Sponsor
Pray Team Sponsor

**EXHIBIT
I**

Willard McFeely Jr

Montgomery, AL 36117

12-06-2021

Your Honor,

I, Willard McFeely, Jr am writing this letter on behalf of Henry Ruggs III for the case that he is currently facing. This took me by surprise because it is totally out of character for him.

I have known him since he started high school at Robert E Lee in Montgomery, AL as I served as president of the football booster club. I have always known him to be a very focused, disciplined and caring young man. He always had good grades and was always the first to help when I needed assistance. He was a leader on the basketball court, always encouraging the younger players to work hard and get better. During his senior year the football team was ruled ineligible for the playoffs because of an illegal player. A lot of people was in his ear telling him not to worry about it because he had his scholarship to the University of Alabama. Henry, being the leader that he is, took control of the team and even stepped in and played quarterback for the rest of the season because of an injury to his teammate. This is an example of how he strived to make others better rather than thinking of himself.

While attending the University of Alabama as a student athlete and up until this incident I have always been in touch with Henry and have not known him to be anything but upstanding.

I believe this incident was a moment of bad judgement on his part. I know he is deeply regretful of this unacceptable behavior that resulted in the loss of a life.

I would request at this time for leniency in his sentencing. I believe that by him sharing his story, it would help others make a positive change in their lives.

Thank you for your time and consideration,

Willard McFeely, Jr



**EXHIBIT
J**

To Whom It May Concern,

Over the years I have gladly written character statements for various reasons. It is never hard to do so when the truth is being spoken. This particular occasion is no different. As a teacher for over twenty-three years, I have had the pleasure of being a part of the lives of numerous students in big as well as small ways. This is a fact that I cherish most as an educator. Being blessed with a front row seat to the development of young adults is a priceless gift and being able to see Henry develop was no exception.

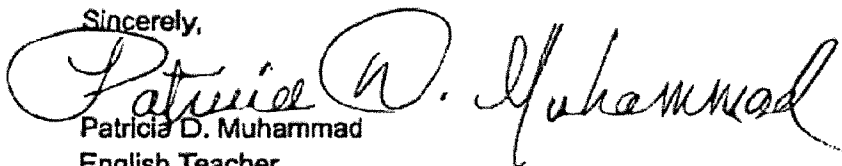
I became acquainted with Henry as a result of teaching his brother Kevontae. Before I actually met him, I heard what his brother as well as other students and faculty had to say. In a high school, reputations are established and hard to change. In Henry's case, he was consistently spoken well of on the field or court as well as off of it. There was an absence of "side chatter" that generally floats among teenagers which demeaned or spoke negatively about him. His reputation was and still is that of a gifted and humble young man.

As Henry's star continued to rise, we all watched with pride as he remained grounded in the face of increasing praise which would have warped one of lesser character. As he returned to visit his Lee "FamiLee," he humbly listened as we questioned him about everything from his adjusting to campus life, attending class and playing in Bryant-Denny Stadium. His demeanor remained that of a grateful and focused young man which only solidified his place in our hearts and expanded his fan base. In a time of over exposure and an ever increasing parade of attention seeking and self-promoting individuals, it was a pleasure to know that we could point to Henry as an example of goodness inside of greatness.

Whether he was dropping in for a visit at the school or humbly spending time with friends and fans, Henry consistently conducted himself with genuine interest and love. He is one of the bright lights that Montgomery, Alabama has produced and we continue to honor him as the native son that possesses the heart of a warrior and the loving and humble spirit of a lamb. Therefore, it is with great pride that I mention his name because he has given us much to celebrate.

Henry's story is still being written. His humble and loving spirit has more light to give to us and the world. I continue to watch as he carries himself with dignity and I speak of him with respect and love. I am grateful for his example and honor what he has given to us all.

Sincerely,



Patricia D. Muhammad
English Teacher
Robert E. Lee High School

**EXHIBIT
K**

December 9, 2021

RE: Character Reference Letter for Henry Ruggs, III

Dear Sir or Madam,

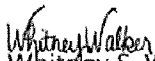
The purpose of this letter is to illustrate the extraordinary character of Henry Ruggs, III. I have known Henry since August 2016— the beginning of my first year as a classroom teacher at Robert E. Lee High School in Montgomery, AL. As a first-year teacher, many challenges arose that my undergraduate coursework did not prepare me for. It was the day I gave my very first exam to my Algebra I students that I learned the heart of Henry. That afternoon after school, I sat in my classroom with tears rolling down my face because I was so disappointed in my students' test results. I truly wanted to quit teaching at that moment. During this time, Henry walked by my classroom, saw me crying, and came in and decided to offer some positive advice. In retrospect, it is quite admirable that a 17-year-old could encourage me to keep going and not to give up. This was the day I knew that Henry was exceptional.

From that day on, Henry would help me in any way he could. He would aid in grading papers if I needed it, assist my ninth-grade Algebra I students with their assignments, express the importance of schoolwork to those students that slacked, and would simply stop by my classroom to make sure that I was okay. I was impressed to learn that this four-sport athlete maintained A's and B's (mostly A's) and would accept nothing less. Henry was the true definition of a role model. I would overhear classroom conversations that made it clear that my students looked up to him. He embodied the role of leadership on the field, court, track, and in the classroom. During his senior year, Henry led the school basketball team in dunks, the football team in receiving yards, and broke the 7A state record in the 100-meter dash in track and field. Henry is one of the most hard-working, passionate, honest, dependable, and caring individuals that I have had the pleasure of meeting over the years. As I have completed five years as a math teacher at Lee High School, I can say without a doubt that Henry is the most outstanding student and athlete that I have encountered. His character goes well beyond what he can do academically and athletically—evident the first time I met him.

Henry proved to remain the same kindhearted individual post-high school. Henry became a community leader who gives back to Robert E. Lee High School and the Montgomery community. Before his first football game as a Las Vegas Raider, Henry became involved in the Las Vegas community as well, donating over 3,000 meals to Three Square Las Vegas.

Despite the unfortunate circumstances that bring this letter about, I can attest that Henry Ruggs, III is still the honorable community leader and noble human being I met more than five years ago.

Sincerely,



Whitney S. Walker, Ed.S.

**EXHIBIT
L**



December 14, 2021

Dear Sir or Madam:

I, Dr. Karen Matthews, Apostle, and Pastor of Kingdom Minded Ministry, respectfully submit this letter with full support, and to bear witness of the humility and character of Mr. Henry Ruggs III.

As a child, I observed Mr. Ruggs' intuitiveness. Under my tutelage, he was in biblical studies, and he remained humble.

Throughout the years, Henry always exemplified a loving heart, and noble character with family values. He is one who appreciates and respects his spiritual morality, and is not capable of intentionally harming any living being in our society.

Charles Dickens' historical novel *A Tale of Two Cities*, (1859) accounts the sentiments uttered from my heart to this court today on behalf of Henry Ruggs III for whom life had become the best of times, and suddenly, in the blink of an eye, the worst.

Less than two years ago I, along with his family, celebrated his remarkable accomplishment of being drafted by the LA Raiders. Indeed, it was the best of times. Today we convene before a court that is taxed with the responsibility of determining the outcome of his life as we know it, deeming these times the worst.

But there's a confident assurance that I have even in the midst of what he could stand to face in this hour. That is, the fact that the same God who admonishes us to forgive others, as we ourselves are forgiven, will deliver both on the behalf of Henry, and the family of the beloved deceased.

576 Oliver Road Suite A
Montgomery, AL 36117
Founder: Apostle Dr. Karen Matthews

“Expecting Greater, Experiencing Greatness and Extending Grace”

I'm reminded of Proverbs 24:16, "*For a just man falleth seven times, and riseth up again: but the wicked shall fall into mischief.*" Henry's first and only fall that the world witnessed in November 2021 was the equivalent of seven, but as the word suggests, he can still get back up again. It is contingent upon this court to embrace these scriptures, even while upholding the law. I solicit your grace and your compassion as you hold Henry accountable for that which has already occurred.

Despite the circumstances, Henry is a soft-spoken, God fearing and humble man. I know, and sincerely believe that he will not be a danger to society. He will have all of the positive and solid support from his family, myself, and the church to continue his spiritual journey, and to remain a positive, influential, law-abiding citizen in our society.

Your consideration is greatly appreciated and highly revered.

Very Truly Yours,

++ *Dr. Karen Matthews*

576 Oliver Road Suite A
Montgomery, AL 36117
Founder: Apostle Dr. Karen Matthews

"Expecting Greater, Experiencing Greatness and Extending Grace"

**EXHIBIT
M**

Robert E. Lee High School

225 Ann Street
Montgomery, AL 36107
334.269.3742



December 4, 2021

Delano R. Muhammad, J.D.
Robert E. Lee High School
225 Ann Street
Montgomery, Alabama 36107

To Whom It May Concern:

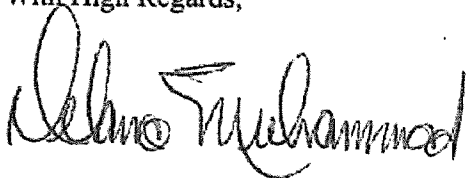
My name is Delano Muhammad, and I am the United States History Teacher and Director of Forensics and Debate at Robert E. Lee High School in Montgomery, Alabama. Words are inadequate to express my sadness over the surrounding circumstances of which I write this character reference for Henry Ruggs, III.

Over the last few weeks, I have watched the news unfold about the tragic car accident resulting in the loss of life of Tina Tintor and her dog in which Henry Ruggs was driving the other vehicle. When I saw this news story, I knew that something did not seem right. Only the court in Las Vegas can determine the facts and ultimate cause of Ms. Tintor's death, but I knew that this car accident did NOT represent the character of a great young man who entered Robert E. Lee High School less than a decade ago, Henry Ruggs, III.

Henry Ruggs was one of the most promising young men that I had the opportunity to meet at Lee High School. I have taught for nearly two decades, and I had rarely encountered a young man whose love and service for others matched his. As I am writing this letter, I had to pause to reflect on Henry's great heart. He was never disrespectful to anyone, and he respected his elders. Henry served as a great example of what it means to be a leader and student-athlete. I loved to see Henry walk the halls of Lee High School. He would always speak to me and others and was so kind to everyone he came across. I truly love this young man as if he was my own son.

Although this event was so tragic that resulted in the loss of life for Ms. Tintor and her dog. I pray to God that this letter serves as a testimony to the great attributes of Henry Ruggs. My prayers go out to the families of Tina Tintor and Henry Ruggs, III.

With High Regards,

A handwritten signature in cursive script that reads "Delano R. Muhammad". The signature is written in black ink and is positioned below the phrase "With High Regards,".

Delano R. Muhammad, J.D.
United States History Teacher
Director of Forensics and Debate

**EXHIBIT
N**

June 29, 2023

Daniel Ballard

Coach/Mentor



Dear Honorable Judge Jennifer Schwartz,

This letter is on behalf of Henry James Ruggs III. I share a close and personal relationship with Mr. Ruggs. I had the pleasure to coach Mr.Ruggs in high school at Robert E. Lee High School. We have known each other for quite some time. When I think of Henry Ruggs III, I think of the bible verse 1 Corinthians 15:33, " Do not be misled: Bad company corrupts good character." I quoted that scripture to say, Henry has always had a great heart and even when he was a star, he was still humble. His humbleness speaks volume on who he was in high school, and still does today. Henry is a caring young man and loves his friends ,family and former teammates. Henry is considered as a son to my family and I. I'm a big believer in second chances and once Mr.Ruggs is given the second chance, he will be forever grateful for the opportunity. You will be proud and love the young man just as we do. Henry has a lot of support behind him. I can guarantee whatever Mr.Ruggs is given, he will do the right thing and there will be no issues.

In conclusion Henry Ruggs III will always stay the same person. He will always have a smile on his face and will always make you laugh, but he will grow and learn from this unfortunate event. He will be a great advocate on how to be careful with being around bad company and not to take risks with so much at stake. I do truly believe once people get to know the man behind the helmet they will love Henry and his family! If you have any questions or concerns contact me anytime by email or phone.

Thank You,

Daniel Ballard

EXHIBIT

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July 14, 2023

RE: Henry Ruggs III
DOB: 1/24/99

This letter is to confirm that Henry Ruggs III received 24 hour residential treatment for the diagnosis of PTSD at the Mental Health Collective in Newport Beach from May 2, 2022 through May 30, 2022.

Mr. Ruggs was fully engaged in the treatment process and made steady progress with his treatment team.

The Mental Health Collective is a nationally recognized treatment program for advanced and neuro-informed trauma intensive treatment. The Mental Health Collective operates in accordance with licensing requirements set forth by the State of California and in full compliance with United States Healthcare regulations.

If any additional information is required, please feel free to contact me.

Sincerely,

Kristen Zaleski PhD, LCSW
Clinical Director
LCS #24996

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that service of the foregoing **DEFENDANT HENRY JAMES RUGG'S**
3 **SENTENCING MEMORANDUM IN MITIGATION OF PUNISHMENT** was served by e-mail
4
5 to the following on the 1st day of August, 2023.

6 Eric A. Bauman, ADA
7 Clark County District Attorney's Office
8 200 Lewis
9 Las Vegas, Nevada 89101
10 Eric.A.Bauman@clarkcountyda.com

11 /s/ Rosemary Reyes
12 _____
13 Rosemary Reyes
14 Employee of Chesnoff & Schonfeld
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