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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BRIAN JUSTIN PICKARD,

15 Defendant.

Case No. 2:11-CR-00449-KJM-16

SUPPLEMENTAL DECLARATION OF  
JENNIE STORMES

16  
17 I, JENNIE STORMES, declare as follows:

18 1. I am the mother to 15 year old Jackson Stormes who suffers from Dravet Syndrome, a  
19 rare and severe form of early-onset epilepsy. I offer this Supplemental Declaration in order to  
20 alert this Court to certain circumstances that have significantly changed since the filing of my  
21 Direct Examination. (Doc. 315.)

22 2. In early September, 2014, after the filing of my direct testimony in this case, Jackson  
23 and I flew to Colorado where we met with Dr. Alan Shackleford, a leading expert on cannabis  
24 treatment, and thereafter decided it was in Jackson's best interest to move to Colorado.

25 3. Our family, already struggling with our current situation, together made the decision to  
26 relocate to Colorado so that we could keep Jackson's seizures at a minimum and, hopefully,  
27 continue to see him smiling. Unfortunately, my older child, Sidnee, had already started college  
28 when we made the decision and our close family was forced apart so Sidnee could finish out the

1 semester, and then transfer to Colorado, depriving me not only of the much needed help caring  
2 for Jackson, but also the presence of my daughter to whom I am very close.

3 4. At the time of filing, our family has resided in Colorado for over a month and the  
4 comparative ease of access to cannabis for his medical condition has taken a huge weight of my  
5 shoulders, so that I no longer struggle everyday to obtain or prepare CBD-rich cannabis in oil  
6 form. Also, due to the ready availability of various strains of cannabis that have been cultivated  
7 with different levels of the main compounds, I have been able to adjust Jackson's cannabis intake  
8 to better suit his specific need. All of this has allowed my small family to feel so much relief that,  
9 once we are reunited with Sidnee, I feel like I can breathe for the first time in over a decade.

10 I declare under penalty of perjury that the foregoing is true and correct, except for those  
11 matters stated on information and belief, and as to those matters I believe them to be true. This  
12 declaration signed on the 3<sup>rd</sup> day of December, 2014, in Colorado Springs, Colorado.

13  
14 /s/ Jennie Stormes  
JENNIE STORMES