

IN THE CIRCUIT COURT OF HARDIN COUNTY
AT SAVANNAH, TENNESSEE

ZACHARY RYE ADAMS

PETITIONER,

vs.

STATE OF TENNESSEE

RESPONDENT.

No. 17-CR-10-PC

STATE'S RESPONSE TO PETITIONER'S MOTION FOR AMENDED WRIT OF
HABEAS CORPUS AD TESTIFICANDUM AND TO
COMPEL THE STATE OF TENNESSEE

COMES NOW, the State of Tennessee, by and through counsel of record, and files this Response to Petitioner Adams's *Motion for Amended Writ of Habeas Corpus Ad Testificandum and to Compel the State of Tennessee*. For cause, the State would state as follows:

1. The State of Tennessee refuses to be involved in Petitioner Adams's and Dr. Spirko's continuous attempts to subordinate perjury with Jason Autry
2. As previously set forth in the State's *Motion Requesting the Court to Appoint Counsel for Jason Autry*, the State is aware through recorded jail calls of three statements made by Inmate Autry in reference to his recorded conversation with Dr. Spirko that are relevant to this response: 1.) Inmate Autry advised Skylar Pinkley on January 3, 2024, that he was "high" on drugs while meeting with Dr. Spirko and being recorded. Specifically, Inmate Autry states the following about Spirko:

1. JASON AUTRY: She asked -- she -- she
2. looked at me and said, can I ask you a question. And
3. I said, what's that. She said, are you high. I sat

FILED 21 DAY OF March, 2025 AT 7:15 AM PM

TAMMIE WOLFE, CLERK

BY

Tammie Wolfe

(CLERK)

4. there for a second, I said, yeah. I said if this is
5. going to hinder you, you need to leave, you know what
6. I mean?
7. SKYLAR PINKLEY: Right.
8. JASON AUTRY: Yeah.
9. SKYLAR PINKLEY: Well, she told me -- she
10. told me that.
11. JASON AUTRY: Yeah. I don't know if that
12. played a part on the deposition or not.
13. SKYLAR PINKLEY: No, she said you done
14. fine.
15. JASON AUTRY: She got what she wanted;
16. didn't she?

2) Inmate Autry advised his mother on January 31, 2024: "They going to fuck me in federal court. I'm fucking them in state court". 3.) Inmate Autry advised his mother on February 4, 2024: "They trying to give me 20 something years in the federal government. I gotta fight back. That's the only think I've got to fight with." (See Collective **Exhibit "F"** found in the State's *Motion Requesting the Court to Appoint Counsel for Jason Autry*).

3. Furthermore, transporting Jason Autry poses a high-security risk for law enforcement, which includes but is not limited to (1) a lengthy, violent criminal history, (2) an attempted escape conviction, (3) gang affiliations, (4) a lengthy prison disciplinary history, (5) serious medical issues, and (6) was attacked and seriously injured by other inmates over the last twelve (12) months.
4. This Court is the distiller of truth. Our job as state prosecutors is unique among licensed attorneys—we have a duty to bring all sides to the court—but we are not asked to put on blinders. The State is aware—and now the court is also aware—of the trickery, deceit, and subterfuge that has been in play from day one by Petitioner Adams and Dr. Spirko. There is not an iota of substance to Dr. Spirko's recorded conversation with Jason Autry on

December 22, 2023. To go along with Petitioner Adams's request to make the State of Tennessee responsible for Jason Autry and get **HIS WITNESS** here under these circumstances would defy the very oath we took as prosecutors.

WHEREFORE, PREMISES CONSIDERED, the State of Tennessee would respectfully request that this Honorable Court:

1. Deny Petitioner Adams's *Motion to Compel the State of Tennessee* to issue a 10-point letter containing the Prosecutor's Certification concerning Jason Autry.
2. For any general or specific relief that the State of Tennessee is entitled to.

Respectfully Submitted:

/s/ Amy P. Weirich /

Amy P. Weirich, BPR (#014441)
Special Counsel
25th Judicial District
P.O. Box 38
Somerville, Tennessee 38068
(901) 465-7351
apweirich@tndagc.org

/s/ Christopher V. Boiano /

Christopher V. Boiano, BPR (#030076)
Assistant Attorney General
18th Judicial District
113 West Main Street
Cordell Hull Building, 3rd Floor.
Gallatin, Tennessee 37066
(615) 451-5810
cvboiano@tndagc.org

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been emailed to Douglas Bates IV and Crystal M. Etue, attorneys for Petitioner Adams, on this 20th day of March, 2025.

Douglas Thompson Bates, IV
Bates & Bates Law Office
406 W. Public Sq., 2nd Floor,
Bates Building, P.O. Box 1
Centerville, TN 37033
dtbates4@bates.law

Crystal M. Etue
Attorney at Law
219 3rd Ave N.
Franklin, TN 37064
crystal@etuelaw.com

/s/ Christopher V. Boiano /

Christopher V. Boiano