People of the State of New York v. Jessica Martin

Student Case File – Parts I – III

Selected Topics in Trial Advocacy: Direct Examination
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Preface

This fictional case file was created solely for classroom use. It provides a realistic, ethically complex foundation for examining evidence and practicing direct examination under the *Guide to New York Evidence.*

Part I – Narrative Overview

Ryan Collins was seventeen when he was found dead in his father's Subaru, parked on a wooded turnout off County Route 112 outside Oakwood, New York. A hose ran from the exhaust pipe into a rear window sealed with duct tape; inside, the air was heavy with carbon monoxide.
On the passenger seat lay his unlocked phone. The final message on its screen, from his girlfriend Jessica Martin, read:

"Now or never. If you don't do it now, you never will."

Within days, the Oakwood County District Attorney convened a grand jury to decide whether Jessica, then eighteen, should be indicted for **Manslaughter in the Second Degree (PL §125.15[1])**—recklessly causing Ryan's death by encouraging his suicide.

Ryan Collins

Ryan was the elder of two children. His father, **Tom Collins**, taught physics at Oakwood High School; his mother, **Dana Collins**, worked nights as a nurse at Oakwood General Hospital. He had a twelve-year-old sister, Lily, and a golden retriever named Scout.

As a freshman, Ryan was bright and creative—he played guitar, drew comics, volunteered at the animal shelter.
Midway through sophomore year, following a breakup, he **attempted suicide by overdose (September 2021)**.
He survived and began treatment with **Dr. Samuel Green**, psychiatrist, who prescribed sertraline 50 mg (later 100 mg) and weekly therapy.

By junior year, Ryan appeared stable but remained emotionally fragile. Dr. Green described him as "highly suggestible and dependent on external validation."

Jessica Martin

Jessica lived two blocks away. Her father, **Michael Martin**, was a **police sergeant** in Riverbend PD; her mother, **Caroline Martin**, taught second grade.
Jessica was driven and accomplished—GPA 94, co-captain of the **Oakwood High cheer squad**, National Honor Society, AP Literature and Photography.
Friends called her confident yet anxious, perfectionistic, eager to "hold things together." However, there was another side to Jessica that she hid well but was evidenced in the way she needled Ryan when no one was watching, and the way she ambitiously put her own interests above everyone elses'

She met Ryan in English class during a project on *The Bell Jar.* They bonded over music and poetry and began dating that spring.

Emily Carter and Lauren Blakeman

Emily Carter, Jessica's best friend since seventh grade, shared her cheer-captain duties and GPA. Practical and loyal, Emily liked Ryan but worried he was "too intense."
Lauren Blakeman had been Ryan's closest friend since freshman art. Quiet and artistic, she understood his moods and often checked on him when he withdrew. She respected Jessica but feared Jessica underestimated how fragile Ryan was.

The Two Suicide Attempts

- **First Attempt – Before Jessica (September 2021):** Ryan overdosed after a breakup, was hospitalized, and began therapy with Dr. Green.
- **Second Attempt – During Relationship (January 2023):** After an argument with Jessica, Ryan again overdosed. He survived. Jessica visited but left early, telling Emily, *"I couldn't watch him like that."* Dr. Green adjusted medication and urged Ryan to rebuild supports.

Jessica therefore knew of **both prior suicide attempts** when she continued dating him.

The Relationship's Arc

At first, their relationship was tender and creative—shared playlists, photos, late-night talks. By senior fall, Ryan's dependence intensified. Jessica felt trapped between compassion and exhaustion. She told Emily, *"He's sweet, but I can't be his reason to live."*

In therapy, Dr. Green noted that Ryan's "self-worth remained conditional on his girlfriend's attention." Jessica sometimes made sharp remarks hoping he'd realize how serious she was about needing space.

The Final Week

Friday, April 14: After cheer practice, Jessica told Emily, "He's talking dark again." Emily: "Tell his parents or Dr. Green." Jessica: "No—he just needs to vent."
Saturday, April 15: Emily texted, "Be careful." Jessica: "I'll handle it."
Sunday, April 16: Ryan texted, "Please talk to me." Jessica: "You say this every time. I can't keep doing this."
Monday, April 17:
8:42 p.m. – Ryan: "I'm done trying."
8:44 p.m. – Jessica: "Then do what you're going to do. Stop making threats."
9:01 p.m. – Ryan: "I'm scared."
9:03 p.m. – Jessica: "Either do it or don't. Now or never."

At 9:28 p.m. his phone stopped transmitting location data. At 10:12 p.m., a driver reported exhaust from a parked Subaru.

Aftermath

Detective Angela Ruiz responded. Ryan was deceased; a short note apologized to his parents and sister.
Jessica, interviewed the next morning, was pale and shaking: *"I didn't think he'd actually do it."*

Tom Collins told reporters, *"My son was a good kid who lost hope. We want answers, not vengeance."*
The autopsy found **acute carbon-monoxide poisoning; manner of death: suicide.**
Prosecutors presented evidence to a **grand jury** to determine whether Jessica's words showed reckless disregard of a substantial and unjustifiable risk of death.

Part II – Police Investigation and Witness Statements

Detective Angela Ruiz – Investigative Summary

Date: April 17, 2023
Scene: Gray 2008 Subaru Outback, engine running; hose from exhaust to rear window; one occupant deceased.
Recovered Items: iPhone (unlocked to thread "Jess 💙"); handwritten note; prescription bottle (sertraline 100 mg); duct tape and hose.

Forensic extraction showed numerous texts with Jessica Martin, ending with *"Either do it or don't. Now or never."*
Jessica admitted sending the text but said she "didn't mean it literally."
Detective Ruiz concluded that Jessica, aware of Ryan's fragile mental state and prior attempts, disregarded a substantial and unjustifiable risk that her words would contribute to his death.

Witness Statement – Emily Carter

"Jessica and I are cheer co-captains. She loved Ryan but was worn down by how often he threatened to hurt himself. I told her to tell his parents or Dr. Green, but

she said it would only make things worse. The Friday before he died, she told me, ‘He’s talking dark again.’ I said, ‘Be careful.’ After he died, she texted, ‘Please don’t hate me.’ She never wanted him gone—she just wanted him to stop scaring her.”

Witness Statement – Lauren Blakeman

“I’ve been Ryan’s best friend since freshman year. He was fragile but trying. I told Jessica he couldn’t take harsh words when he spiraled. She said she was ‘handling it.’ She knew about both attempts—he told her everything. When I saw the last text—‘Now or never’—I felt sick. She didn’t mean to kill him, but she didn’t use good judgment either.”

Witness Statement – Dana Collins (Mother of Ryan)

“Ryan ate dinner with us that night, quiet but calm. He said he was going for a drive. When the police showed me the messages, I couldn’t believe anyone would say that to him, knowing what he’d been through.”

Witness Statement – Tom Collins (Father of Ryan)

“I teach physics at the high school. Ryan showed me a song he’d written the night before. He said Jessica didn’t understand him anymore. I never thought he’d go through with it. I just wish someone had taken his words seriously.”

Witness Statement – Caroline Martin (Mother of Jessica)

“Jessica is responsible and kind. She’s devastated. She keeps saying, ‘I didn’t mean it. I just wanted him to stop threatening me.’ My husband keeps telling her, ‘You’re a good kid; we’ll get through this.’ He won’t say it out loud, but I can tell he’s scared for her.”

Witness Statement – Michael Martin (Father of Jessica)

"Jessica's my daughter, and she's a good kid. What happened is a tragedy, but she didn't want that boy to die. She volunteers at the food drive, helps her brother with homework—she's not a criminal."
(Detective's note: Mr. Martin, a twenty-year police sergeant, remained composed and protective. He made no admissions or statements suggesting legal culpability.)

Part III – Grand-Jury Proceedings (Full Minutes – Testimony Only)

Opening Instruction

FOREPERSON: "Members of the grand jury, your duty is to determine whether there is reasonable cause to believe that **Jessica Martin** committed **Manslaughter in the Second Degree** under Penal Law § 125.15(1). These proceedings are secret. Questions may be submitted through the foreperson. You are not deciding guilt or innocence, only whether sufficient legal evidence exists to indict."

Witness 1: Detective Angela Ruiz

FOREPERSON: Do you swear or affirm that the testimony you give will be the truth?
DET. RUIZ: I do.

EXAMINATION BY ADA KEANE

Q. State your name and current assignment.
A. Detective Angela Ruiz, Major Crimes Unit, Oakwood County Sheriff's Office. Seventeen years on the job.

Q. Were you assigned as lead investigator in the death of Ryan Collins?
A. Yes.

Q. How did this case come to your attention?
A. On April 17, 2023, at approximately 10:12 p.m., patrol reported a stationary vehicle emitting heavy exhaust on County Route 112. I arrived around 10:20 p.m.

Q. Describe what you observed.
A. A gray 2008 Subaru Outback with the engine running. A rubber hose had been inserted from the tailpipe into the rear passenger window, which was sealed with duct tape. The windows were fogged.

Q. Was anyone inside?
A. Yes. One male in the driver's seat, later identified as Ryan Collins, age 17. EMS pronounced him deceased at 10:27 p.m.

Q. What steps did you take at the scene?
A. Secured and photographed the scene, rendered the vehicle safe, initiated a tow to our impound, and inventoried property.

Q. Did you locate a phone?
A. Yes. An iPhone lying on the front passenger seat, unlocked to a thread labeled "Jess 💙."

Q. What did you do regarding the phone?
A. I obtained a search warrant and requested a forensic extraction by our Digital Forensics Unit.

Q. In general terms, what did the communications show?
A. Numerous messages between Ryan Collins and his girlfriend, Jessica Martin, including a final sequence the evening of his death in which Ms. Martin sent a message telling him, in substance, "Either do it or don't. Now or never."

Q. Did you interview Ms. Martin?
A. Yes. On April 18, at her residence, non-custodial, with her mother present.

Q. Did she acknowledge sending the message?
A. She did. She said, "I didn't think he'd actually do it. I was trying to make him stop threatening it."

Q. Did your investigation determine whether Ms. Martin knew of Mr. Collins's prior suicide attempts?
A. Yes. She knew of two: one in September 2021, before they dated, and one in January 2023 during their relationship.

Q. How was that knowledge established?
A. Through medical records, witness statements, and her own acknowledgment that she visited him after the January 2023 attempt.

Q. Did you find evidence of third-party involvement at the scene?
A. No. No signs of struggle and no indication anyone else was present when he died.

Q. Did Ms. Martin call 911 or notify his parents after sending the “Now or never” message?
A. No 911 call from her device and no call to his parents between that message and discovery.

Q. Based on your training and experience, how did you assess Ms. Martin’s conduct?
A. She knew he was acutely fragile and had twice attempted suicide, yet sent a message that disregarded a substantial and unjustifiable risk he would act.

ADA KEANE: No further questions.

EXAMINATION BY GRAND JURORS

GRAND JUROR #3: Was there any note blaming Ms. Martin?
A. The note apologized to his parents and sister but did not name Ms. Martin.

GRAND JUROR #8: How much time elapsed between the last message and EMS pronouncement?
A. Roughly an hour and a quarter, based on phone logs and EMS run sheets.

FOREPERSON: Any further questions? (No response.) Detective, you may step down.

Witness 2: Emily Carter

FOREPERSON: Do you swear or affirm to tell the truth?
EMILY CARTER: I do.

EXAMINATION BY ADA KEANE

Q. State your name and how you know Jessica Martin.
A. Emily Carter. Jessica has been my best friend since seventh grade. We’re co-captains of the cheer squad.

Q. Did you know Ryan Collins?
A. Yes. He dated Jess junior and senior year.

Q. Describe their relationship over time.
A. It started sweet. Later it got heavy. He depended on her for constant reassurance; she cared but felt overwhelmed.

Q. Did Jessica discuss Ryan's mental health with you?
A. A lot. She said he talked about dying; she was scared he might, but she was exhausted by the constant crises.

Q. Did you give her advice?
A. Yes—tell his parents or his psychiatrist, Dr. Green. She said he'd be angry and it could make things worse.

Q. Did Jessica know Ryan had previously attempted suicide?
A. Yes—both the one in 2021 before they dated and the one in January 2023. She visited him at the hospital in January.

Q. Did you see Jessica close in time to his death?
A. On the Friday before. She said he was "talking dark again." I told her to be careful.

Q. Do you recall Jessica ever saying "He should either do it or stop talking about it"?
A. She said something like that to me once in frustration. I don't think she meant it literally.

Q. After Ryan died, did she contact you?
A. Yes. She texted that she couldn't believe he was gone and begged me not to hate her. She blamed herself and cried.

Q. In your view, did Jessica want Ryan to die?
A. No. I think she wanted the threats to stop. She said something terrible because she was worn down.

ADA KEANE: No further questions.

EXAMINATION BY GRAND JURORS

GRAND JUROR #6: Did Jessica ever ask you to call 911 for Ryan?
A. No. I offered, but she said she could handle it.

GRAND JUROR #11: Did you ever contact Ryan's parents?
A. I didn't. I told Jess she should. I wish I had.

FOREPERSON: Thank you, Ms. Carter. You may step down.

Witness 3: Lauren Blakeman

FOREPERSON: Do you swear or affirm to tell the truth?
LAUREN BLAKEMAN: I do.

EXAMINATION BY ADA KEANE

Q. How did you know Ryan Collins?
A. We were best friends since freshman year—art class and music. He confided in me.

Q. Did you know Jessica Martin?
A. Yes. At first she steadied him. Later, he hinged on her attention.

Q. Did you ever talk to Jessica about Ryan's fragility?
A. Yes. I told her he could spiral fast and to be gentle. She said she was "handling it."

Q. Did Jessica know about Ryan's prior suicide attempts?
A. Yes. I told her about the first one. She visited him after the January attempt.

Q. Did Ryan ever describe things Jessica said that upset him?
A. He said she told him to stop being "so heavy," and later that she "couldn't keep fixing him." He felt abandoned.

Q. Have you seen the final "Now or never" message?
A. Yes.

Q. What was your reaction?
A. Shock. She knew how fragile he was. You don't say that to someone like Ryan.

Q. Do you think Jessica wanted him dead?
A. No. But I think she was reckless with her words.

Q. Do you feel any responsibility yourself?
A. Some. I wish I'd pushed harder that week. But there's a difference between missing signs and daring him to do it.

ADA KEANE: No further questions.

EXAMINATION BY GRAND JURORS

GRAND JUROR #2: When did you last hear from Ryan?
A. April 12. He texted "Busy. Don't worry." I didn't press. I regret that.

GRAND JUROR #10: Did you consider calling his parents after January?
A. I did. He begged me not to. Looking back, I should have.

FOREPERSON: Thank you. You may step down.

Witness 4: Dr. Samuel Green, M.D.

FOREPERSON: Do you swear or affirm to tell the truth?
DR. GREEN: I do.

EXAMINATION BY ADA KEANE

Q. Please state your profession and background.
A. I'm a board-certified psychiatrist specializing in adolescent mood disorders. Twenty years in practice.

Q. Did you treat Ryan Collins?
A. Yes—from September 2021, following his first overdose, until his death in April 2023.

Q. What was his diagnosis?
A. Major Depressive Disorder, recurrent, moderate, with anxious features.

Q. What treatment did you provide?
A. Cognitive-behavioral therapy, safety planning, and sertraline—initially 50 mg, later 100 mg daily.

Q. Did he have a history of suicide attempts?
A. Two. One in September 2021 before dating Jessica, and another in January 2023 during the relationship.

Q. To your knowledge, did Jessica know about those attempts?
A. Ryan reported that she did. He said she visited him after the January attempt.

Q. Describe Ryan's relationship with Jessica from a clinical standpoint.
A. He was highly dependent on her approval. His mood rose and fell with her attention. He was suggestible and vulnerable to perceived rejection.

Q. In clinical terms, what impact could a message such as "Either do it or don't. Now or never" have on a patient like Ryan?
A. It could be catastrophic—experienced as permission or a challenge, lowering internal inhibitions and increasing the likelihood of an attempt.

Q. Are you offering an opinion on legal causation?
A. No. I'm describing foreseeable psychological impact, not legal conclusions.

Q. When did you last see Ryan?
A. March 21, 2023. Hopeless affect; denied a specific plan. I scheduled follow-up for April 18. He missed it.

Q. What protective measures did you recommend?
A. Close parental monitoring, limiting isolation, continued therapy, and encouraging support beyond the romantic relationship.

ADA KEANE: No further questions.

EXAMINATION BY GRAND JURORS

GRAND JUROR #5: Could his medication have increased risk?
A. Early in SSRI treatment there can be activation, but he was on a stable dose. Interpersonal stressors were the greater risk.

GRAND JUROR #12: Would a reasonable person aware of his history appreciate that such language was dangerous?
A. In my professional view, yes.

FOREPERSON: Thank you, Doctor. You may step down.

Closing Instruction

FOREPERSON: “Members, your question is whether there is **reasonable cause** to believe that **Jessica Martin**, **recklessly**—that is, with conscious disregard of a substantial and unjustifiable risk—caused the death of **Ryan Collins**, within the meaning of Penal Law § 125.15(1). If you so find, return a true bill; if not, a no bill.”

End of Part III – Full Grand-Jury Minutes

PART III – EXHIBITS

Exhibit A – Oakwood Police Department Report

Reporting Officer: Detective Angela Ruiz
Incident Date: April 17 2025
Case No.: 25-1842-H
Victim: Ryan Collins, M/W 18 years
Suspect: Jessica Martin, F/W 18 years

Narrative:
At 2212 hours officers responded to County Route 112 regarding a possible unconscious male inside a vehicle. On arrival, officers observed a gray Subaru Outback, NY plate KXK-7715, engine running, duct-taped hose leading from tailpipe into rear window. Victim seated in driver's seat, unresponsive. EMS pronounced DOA at 2226 hours.

A cell phone (Apple iPhone 12, blue case) displaying a text thread labeled *"Jess 💙"* was recovered from the front passenger seat. A judicial warrant (25-H-224) was obtained for data extraction. No signs of struggle or third-party entry.

Follow-up interviews conducted April 18–19 2025 with Collins family, Martin family, Emily Carter, and Lauren Blakeman. Text exchange indicated direct verbal encouragement from Jessica Martin to victim immediately preceding death. Case referred to District Attorney's Office for presentation to the Grand Jury.

Exhibit B – Autopsy Report (Suffolk County Medical Examiner)

Case #: 2025-4412
Name: Collins, Ryan Michael
Age/Sex: 18/M
Date of Exam: April 18 2025
Pathologist: Dr. Nina Harkins

Cause of Death: Carbon Monoxide Toxicity
Manner of Death: Suicide

Findings:
– Carboxyhemoglobin level: 71%.
– No traumatic injury.
– No evidence of external restraint or struggle.
– Negative for ethanol, benzodiazepines, or narcotics.
– Therapeutic level of sertraline (0.09 mg/L).
Conclusion: Death consistent with self-inflicted CO exposure occurring April 17 2025 between 2100–2130 hours.

Exhibit C – Dr. Samuel Green: Progress Notes (Selected)

Sept 20 2022 – Initial evaluation following overdose. Diagnosis: Major Depressive Disorder. Plan: Sertraline 50 mg q.d.; weekly psychotherapy.

Dec 22 2024 – Seen at Oakwood General post-suicide attempt (CO inhalation). Patient reports relational stress with J.M. Re-establish safety plan.

Jan 5 2025 – Follow-up after discharge. Mood subdued; denies current intent. States "Jess says she can't handle this." Increase medication to 75 mg; continue therapy.

Mar 18 2025 – Session #112. Patient shows screenshot of text from J.M.: *"You'd be better off dead than like this."* Cried throughout. Plan: contact parents (with consent), review crisis plan, monitor for risk.

Apr 14 2025 – Last session. Patient reports: "Jess is done talking." Affect flat, denies plan, agrees to next session 4/21. Warned parents to check nightly.

Exhibit D – Oakwood General Hospital Discharge Summary

Patient: Collins, Ryan M.
Admission: Dec 28 2024 **Discharge:** Jan 2 2025
Attending Physician: Dr. Samuel Green

Reason for Admission: Suicide attempt via CO inhalation.
Course of Treatment: Stabilized with O_2 therapy; no organ damage.
Psychiatric Consult: Dr. Green; major depression with dependent features.
Discharge Instructions: Follow up with Dr. Green within 5 days; attend therapy twice weekly; no unsupervised vehicle access for 30 days.
Remarks: Girlfriend Jessica M. visited once, appeared distressed; interaction brief.

Exhibit E – Text Message Transcript (Ryan ↔ Jessica)

March 9 2025 – Extracted from Ryan Collins's iPhone
Ryan: You'd be better off without me.
Jess: Stop saying that. It's draining.
Ryan: I'm sorry. I just can't help it.
Jess: Then get help or stop threatening this.
Ryan: You don't care.
Jess: You're wrong. I'm just tired of the same thing every day.

April 17 2025 – Final Thread (20:42–21:01)
Ryan: I'm done trying.
Jess: Then do what you're going to do. Stop making threats.
Ryan: I'm scared.
Jess: Either do it or don't. Now or never.

Exhibit F – Digital Forensics Extraction Summary

Device: Apple iPhone 12, Serial X9M23KQZP.
Warrant: 25-H-224, issued April 18 2025.
Examiner: Det. Ruiz / O.P.D. Cyber Unit.

Findings:
– Complete SMS history with Jessica Martin (10/2023–4/2025) recovered.
– Deleted threads restored show frequent references to suicidal ideation.
– Metadata confirms last message sent by Jessica at 21:01:33 Apr 17 2025.
– GPS coordinates place device at County Route 112 location from 20:55–22:12.
Chain of custody intact.

Exhibit G – Curriculum Vitae: Dr. Samuel Green, M.D.

Education:
– B.A., Psychology, Cornell University, 1997
– M.D., Columbia University, College of Physicians & Surgeons, 2001
– Psychiatry Residency, New York-Presbyterian Hospital, 2005

Certifications:
– Board Certified, American Board of Psychiatry and Neurology
– Subspecialty Certification in Adolescent Psychiatry

Experience:
– Private Practice, Oakwood Psychiatric Associates (2010–Present)
– Consulting Psychiatrist, Oakwood General Hospital
– Lecturer, Touro Law Center (Adjunct – Mental Health and the Law)

Publications:
– "Suggestibility and Suicidal Ideation in Adolescents," *J. Adolescent Psychiatry* (2021).

Exhibit H – Property & Evidence Log

Item No.	Description	Recovered By	Location	Date/Time
1	Gray Subaru Outback KXK-7715	Det. Ruiz	CR 112	4/17 22:15
2	iPhone 12 (blue case)	Det. Ruiz	vehicle passenger seat	4/17 22:20
3	Flexible plastic hose (3 ft.)	Det. Ruiz	attached to tailpipe	4/17 22:18
4	Silver duct tape roll (partial)	Det. Ruiz	rear seat	4/17 22:21
5	Patient records (Dr. Green notes)	ADA Keane	subpoenaed from office	4/19 09:10
6	Hospital discharge packet	ADA Keane	Oakwood General Med. Rec.	4/19 09:40

End of Part III – Exhibits A–H.