Reasons why Shea should be given Clemency

1. Shea's young age at the time of the crime favors mercy in this case.

Shea is no longer the arrogant, immature 21-year-old he was when he committed the crimes that led to his incarceration. Now a 40-year-old man, he has grown and matured to the point that he is now ready to live a productive and peaceful life on the outside.

Shea Dease was barely past his 19th birthday at the time of the embezzlement and his 21st at the time of the robbery. Although he was statutorily and constitutionally eligible for the sentence he received, his youth and lack of maturity favors a call for mercy. 21 year-olds, let alone 19 year-olds can be immature and lack good judgement, even when raised in the best of circumstances; some would consider his early childhood the worst of circumstances. From a young age Shea was a victim of sexual abuse, physical abuse, and a witness to domestic violence.

“Although we permit individuals to drive at the age of sixteen and vote at age eighteen, this does not mean they are mature at those ages,” so states an international study by the *National Institute of Mental Health* and *UCLA's Laboratory of Neurons Imaging*, which also agrees that “intellectual maturity comes at age twenty-five”. This study found that the cortical areas of the brain thicken during childhood into adolescence. And in the frontal cortex, gray matter peaks around age eleven and twelve years old. There is a slight difference between girls and boys with the brain of girls developing slightly quicker than boys. Then, the brain goes through pruning, which means connections within the brain that are not used are lost. The connections that do survive the pruning process gain strength in transmitting information when myelin, a fatty cell material, which develops and acts as insulation around the neural connections. The research shows that this insulation process does not occur in the prefrontal cortex until the early 20s or later. The NIMH continues, “The prefrontal cortex coordinates higher-order cognitive processes and executive functioning,” The executive functions are the supervisory cognitive skills for goal-directed behavior, planning, working memory, strategizing, attention, and impulse control. All of these skills work together to allow an individual to pause, evaluate the situation, consider options, plan, react, and then implement a plan. To furthermore elaborate, Dr. Laurence Steinberg, the nationally recognized authority on adolescent brain development, who testified in *Cruz v. United States*, defined early adolescence between the