

# Open Strong: Beginning With the End In Mind

**Voir Dire to Verdict  
October 24, 2025**

Simplicity

What Do You Want Jurors to Say  
the Case Is About?

# What Are You Telling the Jury the Case is About?

- Right Frame
- Right Story
- Right Sequence



# Creating the Right Frame

# Creating the Right Frame

- We want everything the defense says in their best frame to push jurors further in our favor
- Our frame may include a call to action for jurors to help change the defendant's dangerous behavior
- The frame may also trigger fundamental principles of fairness and universal human values



# Creating the Right Frame

- Free Pass
- Life, Liberty, & Pursuit of Happiness



# Telling the Right Story

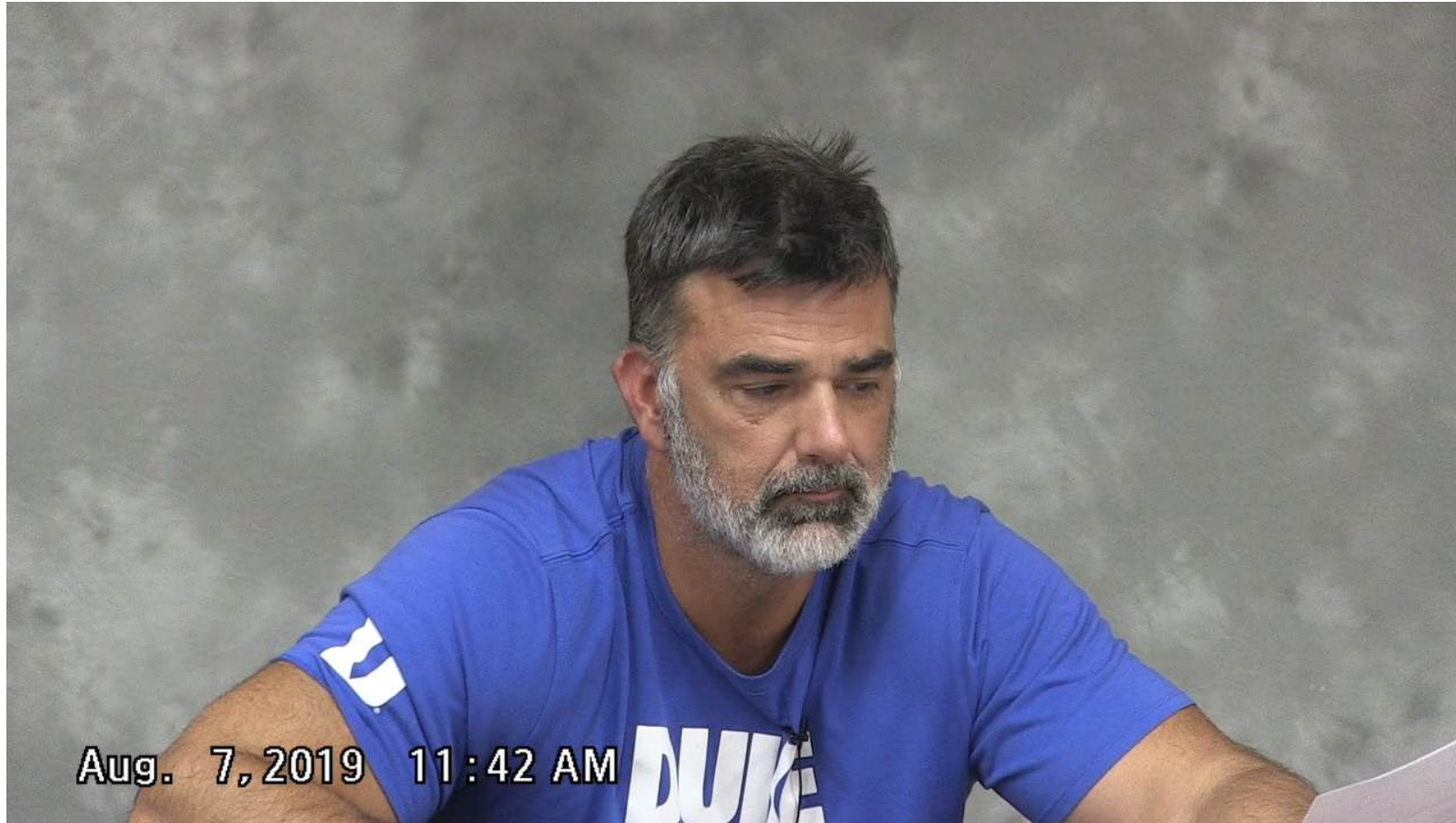
# Telling the Right Story

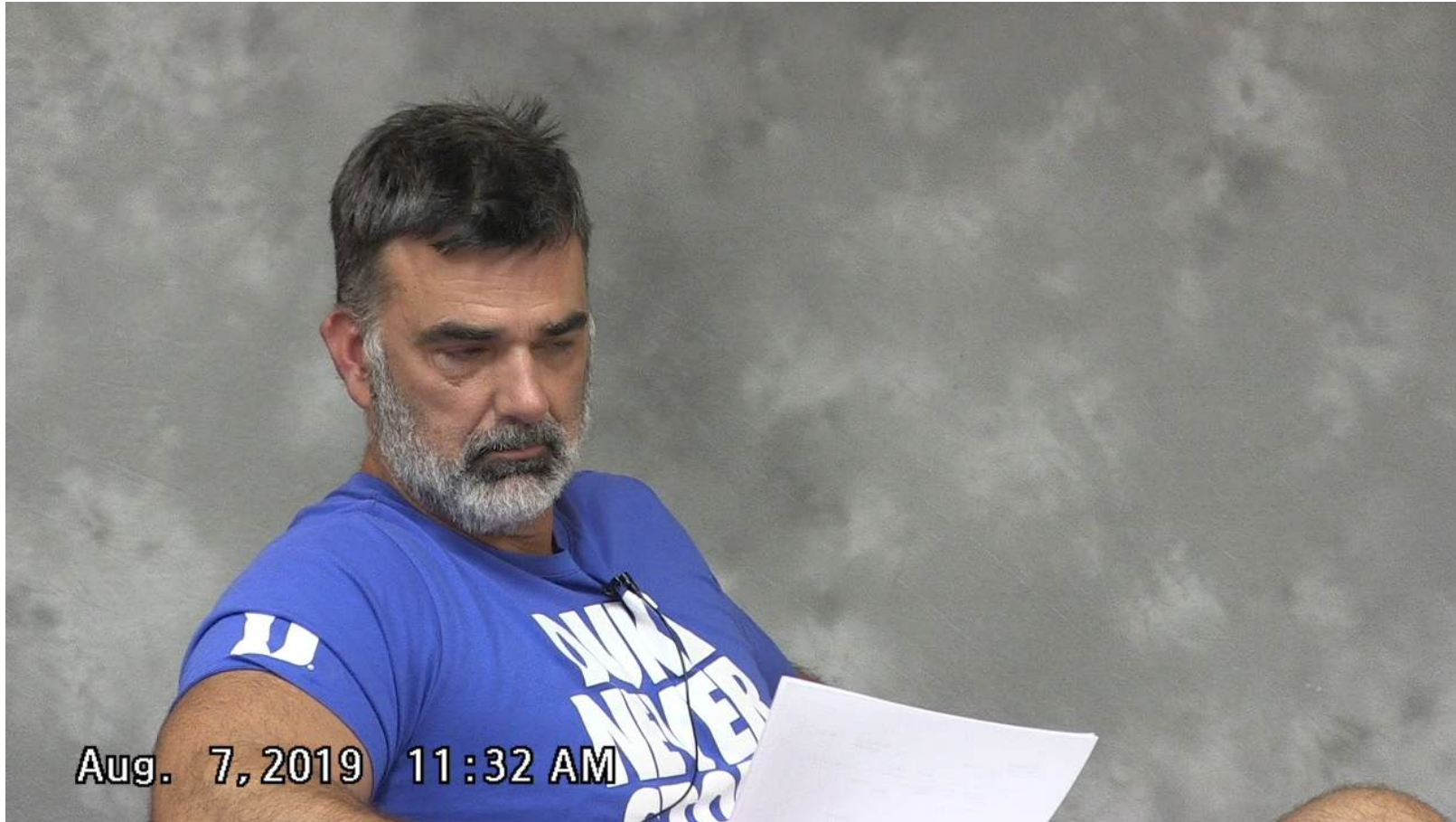
- Defendant's Conduct
- Client's Life
- Jurors' Role

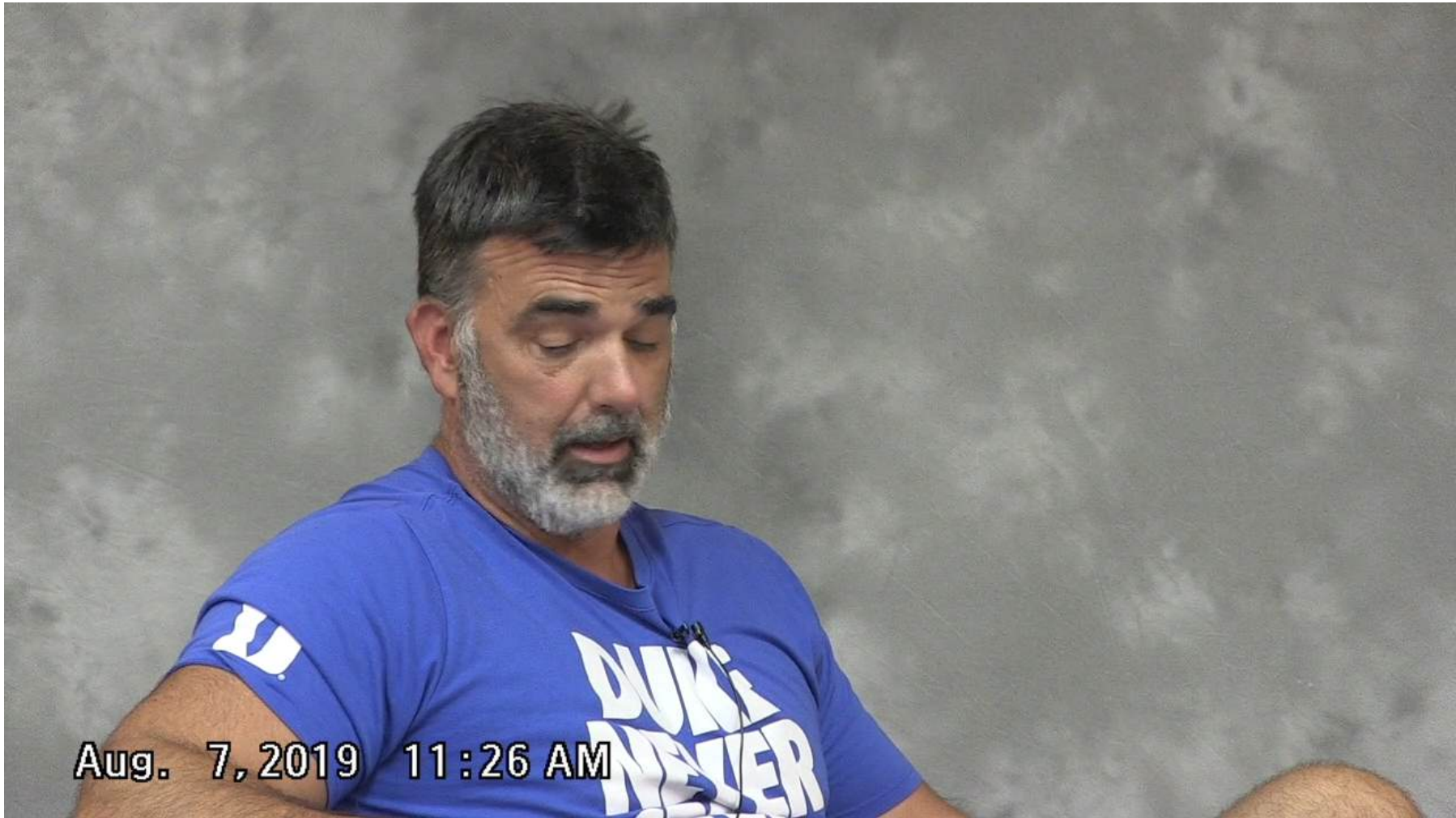


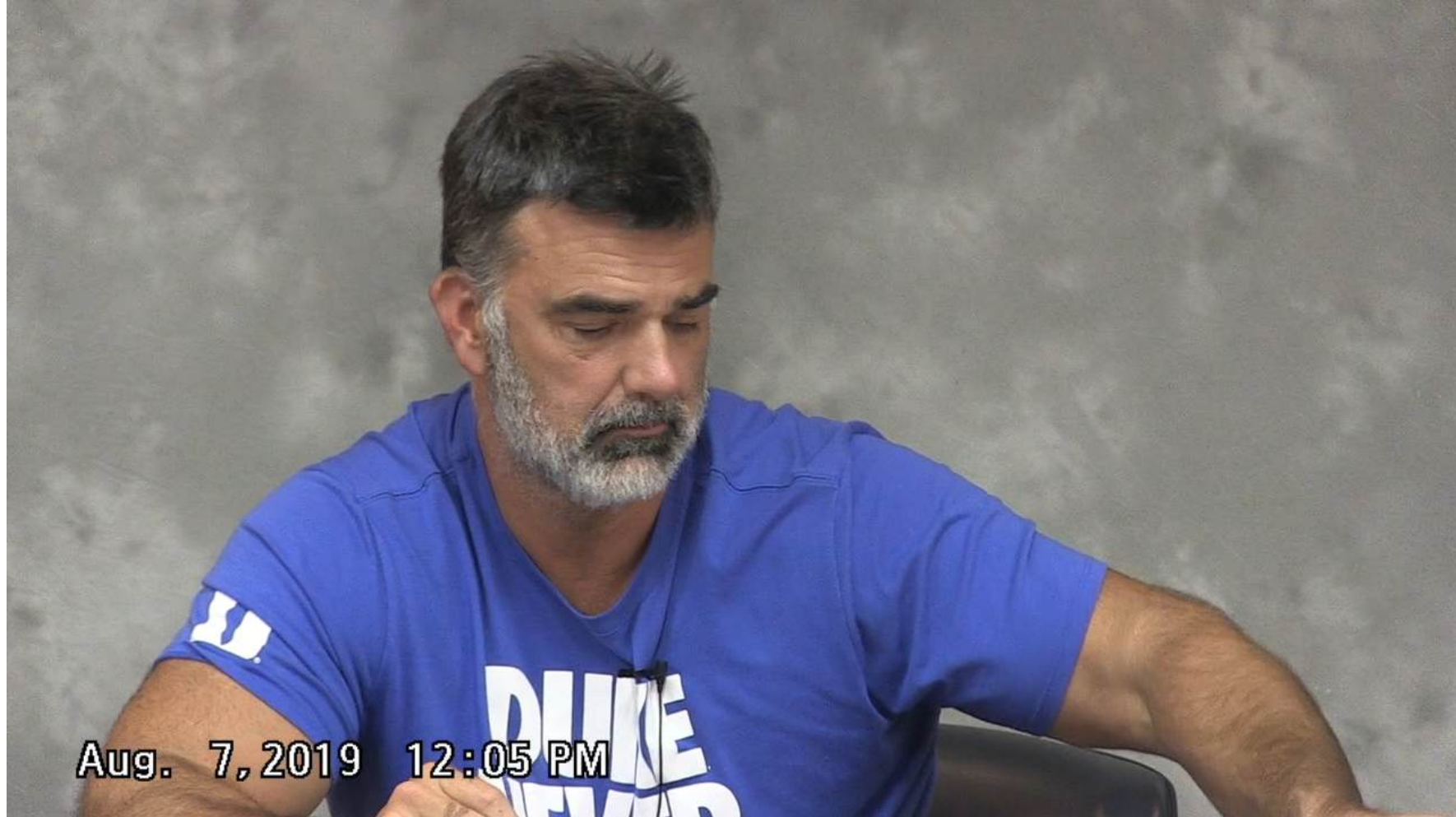
# Defendant's Conduct

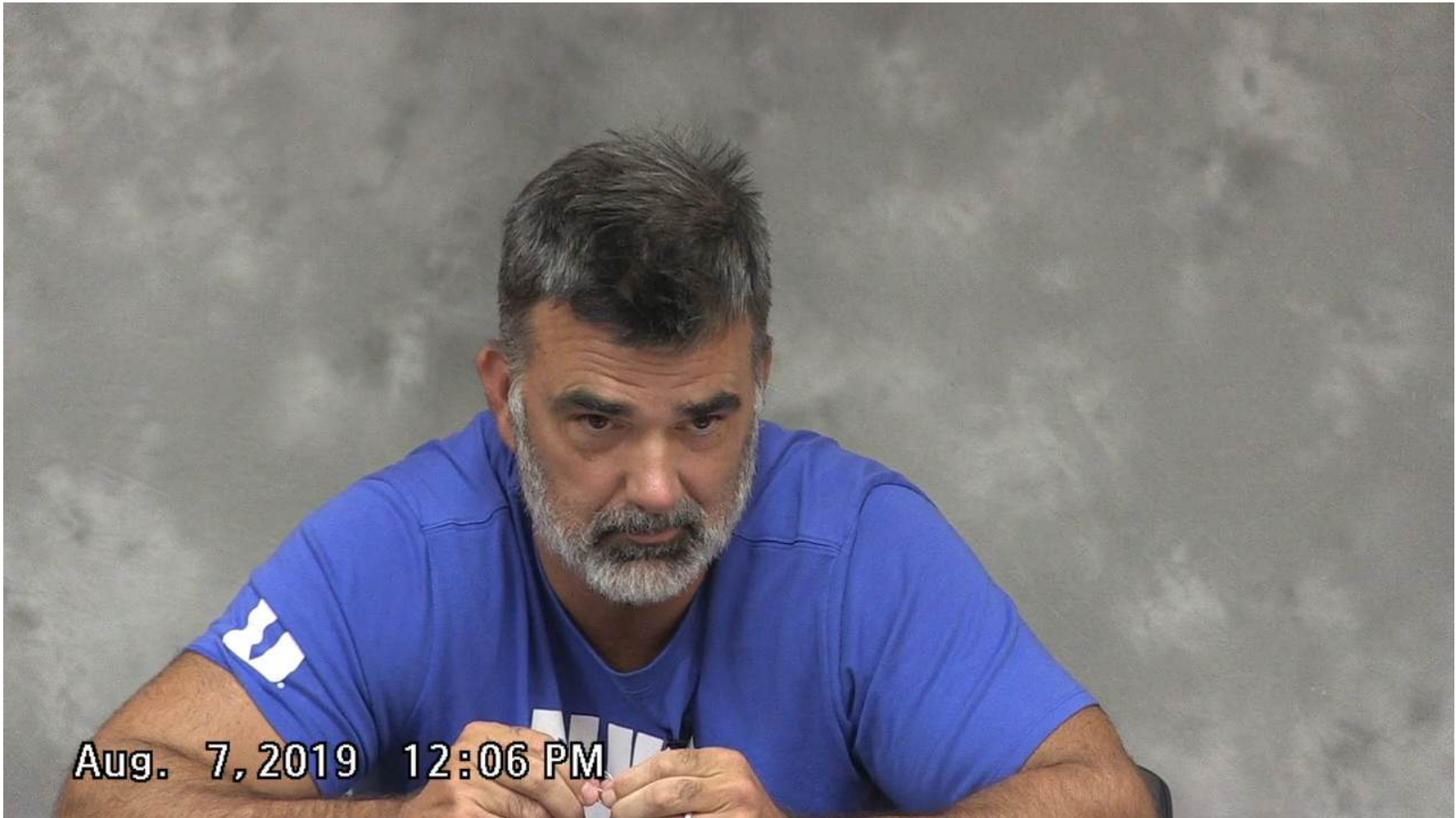












Aug. 7, 2019 12:06 PM





# Client's Life



# Wendy Sanderson

05/07/2018

C7-T1 Left Hemi-Foraminotomy







ST. LOUIS PUBLIC SCHOOLS - GIFTED/TALENTED PROGRAM  
SUMMARY REPORT OF PSYCHOLOGICAL EVALUATION

I.D. NO. 49464753 DATE OF REPORT 2/17/91 RACE: 1 2 3  
 NAME Koenig, Ryan BIRTHDATE 10/4/85 AGE: 54  
 ADDRESS 3908 Junata 63116 PHONE 726-4463 (Yr/Mo)  
 SCHOOL Union Nursery (Zip Code) GR 4 TEACHER (Home) (Business)  
 MOTHER'S NAME Bridget Koenig FATHER'S NAME Marvin Koenig

SAT PIAT \_\_\_\_\_ DATE \_\_\_\_\_ COGAT \_\_\_\_\_ DATE \_\_\_\_\_  
 EXAMINER \_\_\_\_\_ VSAS \_\_\_\_\_ QSAS \_\_\_\_\_ NSAS \_\_\_\_\_ PSAS \_\_\_\_\_  
 RC \_\_\_\_\_ %ile TM \_\_\_\_\_ %ile DAT \_\_\_\_\_ DATE \_\_\_\_\_  
 BBT \_\_\_\_\_ %ile OTHER \_\_\_\_\_ %ile V-R \_\_\_\_\_ %ile N-A \_\_\_\_\_ %ile N+V \_\_\_\_\_ %ile

PPVT-R DATE 2/12/91 EXAMINER J. Peables SS 138 %ile 99  
 KIDS DATE 2/12/91 AGE 54 EXAMINER Peables  
 NC 99 %ile AS 99 %ile PP 80 %ile LS 99 %ile VS 99 %ile MS \_\_\_\_\_ %ile  
 DIAL-R DATE \_\_\_\_\_ AGE \_\_\_\_\_ EXAMINER \_\_\_\_\_  
 MOTOR \_\_\_\_\_ %ile CONCEPTS \_\_\_\_\_ %ile LANGUAGE \_\_\_\_\_ %ile TOTAL \_\_\_\_\_ %ile  
 SLOSSON/SLOSSON-R DATE \_\_\_\_\_ EXAMINER \_\_\_\_\_  
 CA \_\_\_\_\_ MA \_\_\_\_\_ IQ \_\_\_\_\_ %ile TSS \_\_\_\_\_ %ile

~~WISC-R~~ WAIS-R WPPSI DATE 2/19/91 EXAMINER C. Allen  
 VIQ \_\_\_\_\_ PIQ \_\_\_\_\_ FSIQ \_\_\_\_\_ %ile

BINET: L-M BINET (4TH ED) DATE 2/19/91 EXAMINER C. Allen  
 CA 5-4 MA 8-2 IQ 148 %ile 99.9+  
 VR(SAS) \_\_\_\_\_ AVR(SAS) \_\_\_\_\_ QR(SAS) \_\_\_\_\_ STM(SAS) \_\_\_\_\_ COMPOSITE(SAS) \_\_\_\_\_  
 TONI DATE \_\_\_\_\_ EXAMINER \_\_\_\_\_ IQ \_\_\_\_\_ %ile

TORRANCE DATE \_\_\_\_\_ FIGURAL-VERBAL FORM A-B EXAMINER \_\_\_\_\_  
 T-SCORE: FLU \_\_\_\_\_ FLEX \_\_\_\_\_ ORIG \_\_\_\_\_ ELAB \_\_\_\_\_ %ile \_\_\_\_\_

STATUS: EGT IGT IAA PRA



# Southwest City Journal

WEDNESDAY, JULY 22, 1992



## On the case

### Mysteries no contest for young detective

By Lois Kendall  
Staff writer

Private investigators beware. "Ryan the Great, Best Detective in the Universe," may soon be muscling into your territory.

The south St. Louis sleuth already has cracked several tough cases — like locating missing army men. Admittedly, they were only plastic toys, hidden by his dad in the basement.

But then again, Ryan the Great is only 6 years old.

Ryan Koenig is an engaging and enterprising youngster, whose incredible maturity sometimes startles even his parents, Martin and Bridget Koenig. They thought it was "unusual" that he had a 200-word vocabulary at 18 months old. And they said they were a bit taken aback when they asked what school supplies he'd like to start kindergarten with and he replied, "business cards."

His mom gamely helped Ryan turn small squares of cardboard into business cards advertising the "Smartest Detective Agency." She even took a picture of him in his detective outfit — an old trench coat with the too-long sleeves rolled up and an oversize "Sherlock Holmes" hat — to use on his letterhead.

"I use it for flyers and stationery," Ryan says matter-of-factly. "I haven't done too much yet — my dad has to hide things and think of clues — but I think I'm going to get more business because I advertised at school. I want people to come to my detective desk — (an old tabletop set on boxes in his basement "headquarters") — and ask me to find stuff that's missing. Then I'd go around their neighborhood and see if anyone found it — no charge."

When he's not solving cases, Ryan's entering — and winning — contests. At age 4 he drew a "Rangermobile" in a promotion for the Chip 'N Dale Rescue Rangers TV show. He won a stuffed

cases are too tough for Ryan Koenig, 6. He has entered — and won — a variety of contests, reads at an advanced level, and will enter first grade this fall.

See RYAN, Page 9A



# Lifestyle

May 9, 1993, SoCo/SW Co/Oak Sunday Home Journal, Page 1C

## Safety in numbers: Contest entries offer tips for bicycle riders

### WINNING ESSAY

**O**n April 17, 1993, I learned to ride my bike without training wheels. I went to the library, but could not find a book on bike safety. I started to think about bike safety and how it could help me prevent a serious accident.

I always walk my bike across streets, I never ride in the street, and I am careful not to hit pedestrians. If I ride at night, I would make sure I had a bike light and reflectors and that I was wearing light-colored clothing so people could see me in the dark. I always make sure my shoes are tied so my laces won't get caught in the spokes or the chain. It is also a good idea to have an identification card in my pocket. It is important to wear a helmet to protect my head and, because I have just learned to ride my bike, it is probably important for me to wear knee pads and elbow pads.

Ryan Koenig, age 7  
south St. Louis

### Runner-Ups

**W**hy am I a safe biker, you ask?  
Well, one reason is because it's better to be safe than sorry. What I mean is, you must watch for oncoming cars, wear a bicycle helmet to protect your head if you fall, make sure your bike



Tim Parker photo

Ryan Koenig, 7, of south St. Louis, proudly displays the safety helmet he won for his essay on bicycle safety. The competition was sponsored by the SSM Institute and the Suburban Journals.

## **Ryan Koenig** *St. Louis*

Ryan Koenig, a fourth-grade student at Kennard Classical Junior Academy, has been chosen as a winner in the Magic House's Did You Know Contest for the fourth consecutive year. This year he submitted "Did you know it would take 6,000 helium-filled balloons to lift a 75 pound child into the air?"

He won free passes to the Magic House, a Did You Know T-shirt and a book.



KOENIG, RYAN M  
 3908 JUNIATA ST  
 ST LOUIS MO 63116

GRADE 10  
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HIGH SCHOOL CODE: 262964  
 DATE TESTED: 10/23/01  
 SORT CODE: --

# plan<sup>®</sup> STUDENT REPORT

**YOUR TEST SCORES:** National Percentile Rank in the profile below shows how your scores compare with those of students in 10th grade generally. Dashes or stars next to your National Percentile Rank show that your scores are estimates, not exact measures, of your educational development at the time you took PLAN. In the far right column, you can see your National Percentile Rank compared to 10th graders who said they planned to go to college. These scores are only one estimate of what you know and/or do in language, math, and science. As you think about your strengths and weaknesses, be sure to also consider the courses you have taken and the grades you have earned.

KNOWLEDGE AND SKILL AREAS	TEST SCORES (1-31)	SUB-SCORES (1-16)	NATIONAL PERCENTILE RANK: PERCENT OF FALL-TESTED 10TH GRADERS SCORING AT OR BELOW YOUR SCORE							COLLEGE BOUND 10TH		
			ALL 10TH GRADERS									
			1%ile	11%ile	25%ile	50%ile	75%ile	85%ile	99%ile			
ENGLISH	27								----	99	99	
LANGUAGE MECHANICS		13							-----	95	94	
RHETORICAL SKILLS		16								99	99	
MATHEMATICS	23								-----	96	95	
PRE-ALGEBRA/ALGEBRA		11							-----	93	90	
GEOMETRY		13							-----	95	93	
READING	24								-----	95	94	
SCIENCE REASONING	25									-----	96	99
COMPOSITE (Average) SCORE	25									****	99	99







01/15/58



# St. Louis



## the 100 GREATEST MUSICIANS IN ST. LOUIS HISTORY

From **CHUCK BERRY** to **TINA TURNER**,  
**UNCLE TUPELO** to **MILES DAVIS**,  
**SCOTT JOPLIN** to **NELLY**  
& Many More...

### POKEY LAFARGE AND THE SOUTH CITY THREE

As the success of the *O Brother, Where Art Thou?* soundtrack showed, the old is new again—and Pokey LaFarge and the South City Three are right in the midst of the revival. Shortly after LaFarge self-released his debut, *Marmalade*, in 2007, he snagged a main-stage spot at Portland, Ore.'s indie roots fest



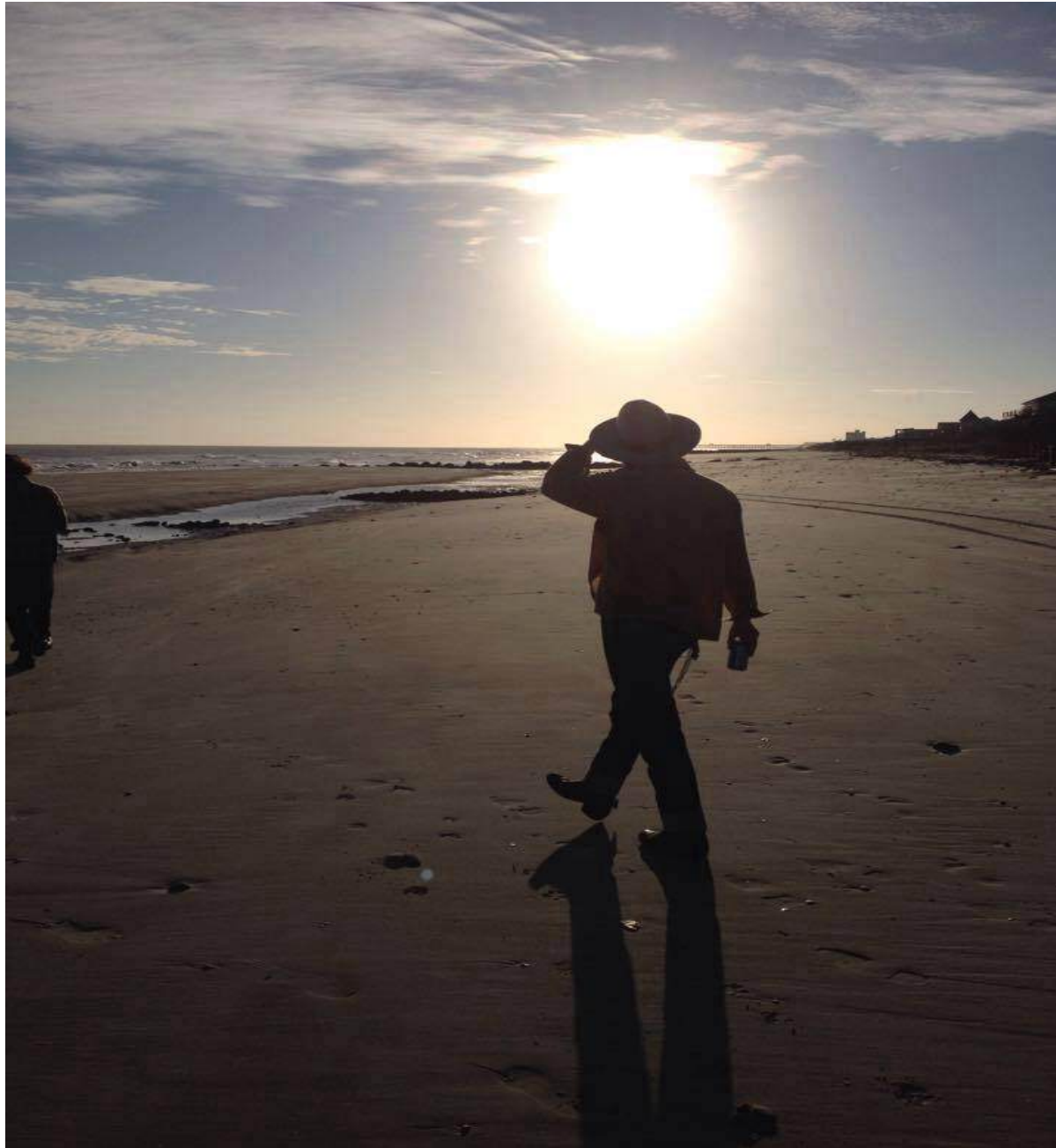
PHOTOGRAPH BY PAUL NORDMANN

Pickathon; before long, the troubadour with old-time style was working with the similarly minded South City Three, comprising upright-bassist Joey Glynn, guitarist Adam Hoskins, and percussionist Ryan Koenig. Soon, the four were playing the U.K.'s Big Chill Festival, Denmark's

Tønder Festival, and the Newport Folk Festival, where *Spin* dubbed the group the fest's Best Discovery in 2010. In the world of roots music and Americana, the four are rapidly rising stars, earning praise from *No Depression*, NPR Music, and many other outlets; charting in the

U.S. and the U.K.; recording with rocker Jack White; and even ringing in 2012 alongside Aloe Blacc and Cyndi Lauper on BBC Two's *Hootenanny* with the legendary Jools Holland.





Customer Copy

Muddy Waters Coffee, LLC.  
1739 Maybank Highway, Suite W  
Charleston, SC 29412  
United States  
8434696981

Order Id: 355185  
Item Count: 2

Date: 2017-12-05

Time: 08:18 AM

Qty.	Product	Amount
1	x Espresso - double	\$2.00
	Extra Shot	\$0.80
	Amount	\$2.80
1	x Coffee - Med	\$2.10
	Extra Shot	\$0.80
	Amount	\$2.90

Subtotal	\$5.70
Tax	\$0.63

**Grand Total**                      **\$6.33**











# Make Causation Simple & Visual





Falsified chlorine levels on pool chemical logs for 3 ½ years



Ashtyn Douglas  
3 Years Old

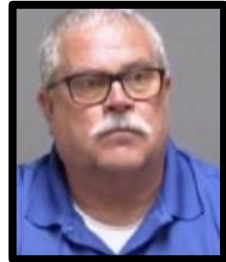
Juan Rivera  
*In Charge of Caribbean Resort & Villas' Pools*



John Konkel  
*General Manager*



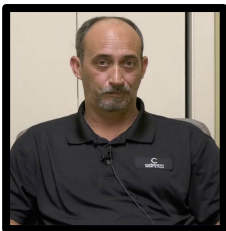
Denise Staley  
*Asst. General Manager*



Tony Robinette  
*Chief Engineer*



Rob Wright  
*Asst. Chief Engineer*



Juan Rivera  
*Certified Pool Operator*



Ashtyn Douglas  
*3 Years Old*

# Jurors' Role



# Jurors' Role

- Guardians
- Authors
- Appraisers



# Presenting the Right Sequence

# The Right Sequence

- Rowley Three-Step
- Dan Schaar's Pulp Fiction Opening
- David Ball Opening



# Rowley Three-Step



**Step 1** – Our Opening

**Step 2** – Defense Opening

**Step 3** – First Witness Crushes  
Defense's Lies





MOVIECLIPS.COM

# Dan Schaar Pulp Fiction



**Non-Linear**

**Maintain Interest**

**Defendant's Choices are Clear  
Cause of Major Damage to  
Human Being's Life**

# David Ball Opening



**The Man**

**The Myth**

**The Legend**



# CONTACT INFORMATION

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