

COMMONWEALTH OF MASSACHUSETTS

[COUNTY]

TRIAL COURT FOR THE
COMMONWEALTH
***** DISTRICT COURT
DOCKET #

COMMONWEALTH

v.

Defendant’s Memorandum in Support of His Conditional Tender of Plea or Admission

1. The defendant, ** years old, has no prior criminal record whatsoever.
2. A graduate of ***** College, he has been gainfully employed for years. He lives with and contributes to the support of his mother.
3. He has a long psychiatric history, as per the attached four (4) reports from health care providers.
4. At the time of the incident in question, the defendant was literally on his way to meet with a new psychopharmacologist, as he had noticed decreasing effectiveness of the combination of psychiatric medications he had been taking. Anticipating new prescriptions, he unwisely did not take that day’s doses of said medications.
5. His psychiatrist suspects that the defendant has a variant of bi-polar disorder and is currently undertaking trials of medication with mood stabilizing properties.
6. The defendant will remain under the care of his psychiatrist and strictly comply with each and every condition imposed upon him by the Court.

Respectfully submitted,
the defendant,

by his attorney:

Gregory R. Barison
Weston Patrick, P.A.
84 State Street / 11th Floor
Boston, MA 02109

(617) 742-9310
BBO # 029340

date: