

IN THE SUPREME COURT OF THE STATE OF NEVADA

* * *

JASON JONES,

Appellant,

vs.

THE STATE OF NEVADA,

Respondent.

CASE NO. 63136

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Clerk of Supreme Court

APPELLANT'S APPENDIX

VOLUME 2

Direct Appeal From A Judgment of Conviction
Eighth Judicial District Court
The Honorable Valerie Adair, District Court Judge
District Court No. C285488

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0111

1 on January 3, 2013, at the hour of 9:30 AM, to do and receive that which shall then and there be
2 considered concerning the said above-captioned person and have you then and there this Writ.

3 DATED AND DONE this ____ day of December, 2012.

DEC 26 2012

4 COURT CLERK

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7 By 

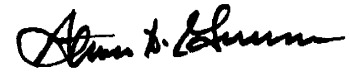
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DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,
Plaintiff,

-vs-

JASON JONES,
#2735018

Defendant.

CASE NO: C-12-285488-1

DEPT NO: XXI

STATE'S OPPOSITION TO DEFENDANT'S MOTION FOR DISCOVERY

DATE OF HEARING: 01/08/13
TIME OF HEARING: 9:30 AM

COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through NELL CHRISTENSEN, Chief Deputy District Attorney, and hereby submits the attached Points and Authorities in Opposition to Defendant's Motion For Discovery.

This opposition is made and based upon all the papers and pleadings on file herein, the attached points and authorities in support hereof, and oral argument at the time of hearing, if deemed necessary by this Honorable Court.

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POINTS AND AUTHORITIES

At the outset, it should be noted that the parties have been in communication regarding the discovery in this case. The parties will continue to work together in an effort to ensure that every piece of discovery in the files of the District Attorney and law enforcement is provided.

NRS 174.235(1) states:

1. Except as otherwise provided in NRS 174.233 to 174.295, inclusive, at the request of a defendant, the prosecuting attorney shall permit the defendant to inspect and to copy or photograph any:

(a) Written or recorded statements or confessions made by the defendant, or any written or recorded statements made by a witness the prosecuting attorney intends to call during the case in chief of the State, or copies thereof, within the possession, custody or control of the State, the existence of which is known, or by the exercise of due diligence may become known, to the prosecuting attorney;

(b) Results or reports of physical or mental examinations, scientific tests or scientific experiments made in connection with the particular case, or copies thereof, within the possession, custody or control of the State, the existence of which is known, or by the exercise of due diligence may become known, to the prosecuting attorney; and

(c) Books, papers, documents, tangible objects, or copies thereof, which the prosecuting attorney intends to introduce during the case in chief of the State and which are within the possession, custody or control of the State, the existence of which is known, or by the exercise of due diligence may become known, to the prosecuting attorney.

NRS 174.235(2) specifically excludes from discovery or inspection attorney work-product or privileged information or documents. In addition, NRS 174.275 allows trial court discretion to order that discovery or inspection pursuant to 174.235 to 174.295, inclusive, be denied, restricted or deferred, or make such other order as is appropriate.

The State recognizes and readily accepts its continuing disclosure obligation to the Defendant in this and every other case to provide discovery pursuant to the provisions of NRS 174.235 et seq., together with any exculpatory material under Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194 (1963) and its progenies. In Brady, the Court held that "the suppression by the prosecution of evidence favorable to an accused upon request violates due process where the evidence is material either to guilt or to punishment." Id. It should be noted that Brady has been interpreted to require prosecutors, in the absence of any specific request, to turn over all obviously exculpatory material. United States v. Agurs, 96 S. Ct.

1 2392 (1976).

2 The United States Supreme Court has held, “[t]he prosecutor is not required to deliver
3 his entire file to defense counsel, but only to disclose evidence favorable to the accused that,
4 if suppressed, would deprive the defendant of a fair trial.” United States v. Bagley, 473 U.S.
5 667, 105 S. Ct. 3375 (1985). In a footnote to this very quote, the Court further stated:

6
7 An interpretation of Brady to create a broad, constitutionally required
8 right of disclosure “would entirely alter the character and balance of
9 our present system of criminal justice.” Furthermore, a rule that the
10 prosecutor commits error by any failure to disclose evidence
11 favorable to the accused, no matter how insignificant, would impose
12 an impossible burden on the prosecutor and would undermine the
13 interest in finality of judgments.

14 Id., at n.7. [citation omitted].

15 Further, Brady does not obligate the prosecution to provide the defense with evidence
16 it could obtain from other sources by exercising reasonable diligence. United States v.
17 McKenzie, 768 F.2d 602 (5th Cir. 1985). The Nevada Supreme Court addressed this in
18 Rippo v. State, 113 Nev. 1239, 946 P.2d 1017 (1997) when it stated, “[t]he prosecution must
19 disclose to the defense evidence in its possession that is both favorable to the accused and
20 material to guilt or punishment [or could be used for impeachment].” Rippo v. State, 113
21 Nev. 1239, 1256, 946 P.2d 1017, 1028 (1997) (emphasis added) (citing Brady, 373 U.S. at
22 87, 83 S.Ct. at 1196; Roberts v. State, 110 Nev. 1121, 1127, 881 P.2d 1, 5 (1994)).
23 However, the Rippo Court agreed that a Brady violation does not result if the defendant,
24 exercising reasonable diligence, could have obtained the information. See, e.g., Williams v.
25 Scott, 35 F.3d 159, 163 (5th Cir.) (Brady claim fails where appellant could have obtained
26 exculpatory statement through reasonable diligence), cert. denied, 513 U.S. 1137, 115 S.Ct.
27 959, 130 L.Ed.2d 901 (1995); United States v. Dupuy, 760 F.2d 1492, 1501 n. 5 (9th
28 Cir.1985) (“if the means of obtaining the exculpatory evidence has been provided to the
defense, the Brady claim fails”); United States v. Griggs, 713 F.2d 672, 674 (11th Cir.1983)
(where prosecution disclosed identity of witness, it was within the defendant's knowledge to
have ascertained the alleged Brady material); United States v. Brown, 582 F.2d 197, 200 (2d

1 Cir.1978) (no violation where defendant was aware of essential facts enabling him to take
2 advantage of the exculpatory evidence). Thus, it is not the State's obligation, under the
3 applicable statute or under case law, to obtain everything the Defendant requests.

4 In United States v. Flores, 540 F.2d 432 (9th Cir. 1976), defendants moved prior to
5 trial to compel the government to disclose the criminal histories and the names and numbers
6 of prior cases in which an informant-witness had testified on behalf of the government. The
7 purpose of this evidence was to impeach the credibility of the informant. The Ninth Circuit
8 affirmed the trial court's denial of that motion by holding that the defendant had made no
9 showing of reasonableness. The Court stated, "[t]heir request was tantamount to asking the
10 government to fish throughout public records and collate information which was equally
11 available to the defense." Id. at 437.

12 In United States v. Lasky, 548, F.2d 835 (9th Cir. 1977), the Ninth Circuit addressed
13 the issue of the prosecutor's discovery responsibility when faced with a broad discovery
14 request. In that case, the defense requested all "Brady material" including probation reports,
15 pre-sentence interviews and reports from "all information regarding police records, arrest,
16 convictions, and any deals, promises or communications with government witnesses
17 regarding benefits they may receive, or have already received for testifying against the
18 defendant." Id. at 839. The Ninth Circuit said:

19 In seeking this information the defendant was not willing to rely on
20 the government's judgment and requested that the government's
21 complete file be produced to examination by the court and defense
22 counsel.

23 Such a general request places the government in no better position
24 than if no request had been made. With broad requests any duty to
25 respond 'must derive from the obviously exculpatory character of
26 the certain evidence in the hands of the prosecutor.' United States
27 v. Agurs, *supra*, 96 S.Ct at 2399. Therefore, the proper standard of
28 materiality is whether the 'omitted evidence creates a reasonable
doubt that did not otherwise exist.' Id. at 2401. Id., *see also* United
States v. Hearst, 435 F.Supp. 29, 30 (N.D. Cal. 1977), (a discovery
request for any evidence regarding each potential trial witness "that
may tend in any respect to reflect adversely upon his credibility to
observe and comprehend the events about which the witness intends
to testify" constituted a vague request such that the prosecutor was
only obligated to disclose previously exculpatory evidence.)

1 Specifically with regard to the defense requests, the State responds as follows:

2 1. *"Verification of all physical evidence impounded under this case and all reports and*
3 *results of scientific tests."*

4 The State is unsure what is meant by the request for "verification of all physical
5 evidence."

6 NRS 174.235(1)(b) requires that the State provide "[r]esults or reports of physical or
7 mental examinations, scientific tests or scientific experiments made in connection with the
8 particular case." The State will comply with this statute.

9 2. *"Any photographs in the State's possession including photographs of Danny Williams*
10 *and Everett Williams, the scene of the crime, photo enlargements of latent prints, and all*
11 *photographs the State intends to introduce as evidence."*

12 The State is obligated to provide items it intends to introduce at trial and law
13 enforcement photographs documenting the instant case. The defense has suggested in other
14 motions that it has photographs of Everett Williams. The State does not at the time of this
15 writing have photographs of him. Detectives took some photos of Danny Williams and
16 those were forwarded to the defense several weeks ago. Crime scene photos have been
17 provided. The State objects to the request to provide any photographs of Danny Williams
18 and Everett Williams outside the scope of what has already been provided.

19 The State is unaware of any photo enlargements of latent prints.

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1 **CONCLUSION**

2 Based on the foregoing, the State respectfully requests that this Court deny the motion
3 to the extent that it exceeds legal requirements placed upon the State by case law or statute.

4 DATED this 26th day of December, 2012.

5 Respectfully submitted,

6 STEVEN B. WOLFSON
7 Clark County District Attorney
8 Nevada Bar #001565

9 BY /s//NELL E. CHRISTENSEN
10 NELL CHRISTENSEN
11 Chief Deputy District Attorney
12 Nevada Bar #008822

13 **CERTIFICATE OF ELECTRONIC FILING**

14 I hereby certify that service of State's Opposition was made this 26th day of
15 December, 2012, by Electronic Filing to:

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DISTRICT COURT
CLARK COUNTY, NEVADA

9 THE STATE OF NEVADA,
10
11 Plaintiff,

12 -vs-

13 JASON JONES,
14 #2735018

Defendant.

CASE NO: C-12-285488-1

DEPT NO: XXI

15 **STATE'S OPPOSITION TO DEFENDANT'S MOTION IN LIMINE TO ADMIT**
16 **EVIDENCE OF AND CONTENTS OF RECORDED 911 REPORT**

17 DATE OF HEARING: 01/08/13

18 TIME OF HEARING: 9:30 AM

19 COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, Clark County
20 District Attorney, through NELL CHRISTENSEN, Chief Deputy District Attorney, and
21 hereby submits the attached Points and Authorities in Opposition to Defendant's Motion In
22 Limine To Admit Evidence Of And Contents Of Recorded 911 Report.

23 This opposition is made and based upon all the papers and pleadings on file herein,
24 the attached points and authorities in support hereof, and oral argument at the time of
25 hearing, if deemed necessary by this Honorable Court.

26 //

27 //

28 //

1 **POINTS AND AUTHORITIES**

2 On Sunday June 17, 2012, Jaime Corona was killed by a gunshot wound to the chest
3 that coursed through his heart. He was killed while in his first floor apartment at 1416 F
4 Street Apartment 10. PHT2 p. 27-30.

5 Earlier in the night, police had responded to the apartment complex due to a 911 call
6 for service from Jaime Corona. PHT2 p. 66-67. They cleared the call at 9:38 p.m. PHT2 p.
7 67. About an hour later, additional calls came in to dispatch regarding Corona being shot,
8 and police responded again. PHT2 p. 68.

9 James Sheffield was one of the neighbors who called 911¹ immediately after the
10 murder. In that recorded call he said, "I don't know who did it, but someone over there saw
11 it. 'Cause we heard the gunshot and whoever it was ran right out the gate." He said he just
12 heard the gunshot and did not see who did it. When asked again if he heard it or saw it, he
13 said, "no, I just heard it." He said, "I was laying down when it happened. . . . I'm gonna put
14 on some shorts and see if I can see what's happening." He said, "I don't know what really
15 happened" and commented that he was going to get dressed and go outside to see if he could
16 find out more. It is apparent that he was inside his apartment for at least part of the
17 telephone call. Loretta Coleman can be heard screaming in the background of the call, and
18 Sheffield calls out to William Coleman at one point.

19 When police responded to 911 calls regarding Corona being shot, they found Corona,
20 deceased from the gunshot wound, and a bullet hole through his metal security door. PHT2
21 p. 30. Several neighbors were outside together upon police arrival. James Sheffield and
22 other witnesses were given voluntary statement sheets to fill out. Sheffield's states, in full²:
23 "I heard (1) gun shot at Apt. 10, 1416 F St. Las Vegas NV. and saw James in Apt. 10 laying
24 on the floor shot in the chest." In the area of the sheet asking "Can you identify the
25 suspect?" he checked the box marked "No."

26 _____
27 ¹ The State will provide the audio recording of the call to the Court with its Opposition.

28 ² Sheffield's Voluntary Statement is attached as an exhibit.

1 Detectives arrived and interviewed witnesses. PHT2 p. 33. Detectives interviewed
2 several neighbors who lived in the complex, including James Sheffield.

3 In his first oral statement³ given to Detectives Boucher and Lafreniere at 1:03 a.m. on
4 June 18, 2012 (approximately two hours and 20 minutes after the murder), Sheffield said that
5 he was inside his apartment when he heard a gunshot. He had just closed his door and laid
6 down when he heard the shot. He got up and stood in his doorway. He saw a "blur", who he
7 believed to be a black male, run through the gate and then go north on F Street. He could not
8 see the person's face, and said he would not be able to recognize him again. Sheffield called
9 911. He went down and saw Corona on the ground with a gunshot wound. He said he never
10 saw a car, but other people in the complex were talking about a black car in which the
11 shooter fled.

12 The lead homicide detectives, Detectives Tate Sanborn and Travis Ivie, reinterviewed
13 several people in the days following the murder. On Tuesday June 19, 2012 around 5:30
14 p.m., they reinterviewed Sheffield at Sheffield's residence. The interview was not recorded.
15 In the Officer's Report, the detectives summarized the statement as follows:

16
17 A few days prior to the shooting his neighbor, Jaime Corona, had
18 burglarized apartment 18, where "J"⁴ lived with his girlfriend and
two small children.

19 On June 17, 2012 at approximately 2030 hours, Sheffield heard and
20 saw "J" knocking on and yelling outside Corona's door. "J" was
21 upset and wanted Corona to pay him money, which Corona owed
22 him. Corona spoke to "J" and told him he was going to call the
police, but "J" did not care. A short time later several police
officers arrived and made contact with Corona. The officers stayed
a short time then left the apartment complex without contacting "J".

23 A short time after the police officers left, Sheffield heard someone
24 knocking on Corona's apartment door. He looked outside and saw
25 "J", knocking and demanding Corona to pay him the money, which
he owed him. "J" continued to knock on the door and yell for
approximately five minutes. Then it was a quiet for approximately
two (2) minutes, followed by a gunshot. Sheffield walked out of his

26
27 ³ The interview was recorded and the transcribed statement is attached.

28 ⁴ "J" is the Defendant.

1 apartment and saw a black male run out the security gate then north
2 bound F Street. The male had a medium build and was
3 approximately 5'6" or 5'7" inches tall, wearing light colored shorts
4 and a grey or light colored hat. This was the same clothing he had
5 seen "J" wearing prior to the shooting. Several different people
6 said Corona had been shot, and he called 9-1-1.

7 Defendant was arrested on Thursday June 21, 2012.

8 Sheffield called 911⁵ again on June 27, 2012. He said he wanted to clarify that:

9 the guy that actually did the shooting - he's got a brother, they look
10 like twins, except one don't have a moustache, and the other one
11 got dreads. And what I thought he had did was cut his moustache
12 off and clip his hair cause he came by here and I looked at him and
13 I told my apartment manager that he's the one that actually did the
14 shooting . . . the one with the dreads. He did the shooting. The guy
15 in apartment 18 he handed him the gun and he the one that drove
16 him away in a little black car.

17 The guy brother with the moustache that I thought it was, he fired a
18 gun, the sa-, and told - everybody in the complex heard it and he
19 said, "see it works." They kicked the door in and shot him in the
20 chest and he died that same night.

21 He said the shooter was Hispanic with dreads. He said the one without the dreads had fired
22 the gun earlier that day and "I guess he gave it to him and that's the gun that they used. I
23 don't know what they did with the gun because like him and 'J' left from here uh and 'J'
24 didn't come back and finally the police caught him and they had him under arrest for the
25 murder."

26 He said Defendant was actually the one that hit Corona in the head a couple days
27 before Corona was killed. He said after Corona was hit over the head, Sheffield "took the
28 police right down where the guy was and pointed him right out." He said that after Corona
had burglarized Defendant's apartment, Defendant went to Corona's apartment and said,
"I'm here to get my shit back and if you don't give it back I'm gonna fuck you up." He said
the police were called after that and the police came and told Defendant "leave him alone
and if we get another call like this again we gonna come straight to you."

⁵ The State will provide the audio of the call to the Court with its Opposition.

1 He also said that the same people who committed the murder had threatened him
2 about 12:30 a.m. or 1:00 a.m. on the date of the call. He said they came driving into the
3 parking lot of the complex. Someone had told him "yeah mother fucker you see too much,
4 we gonna come back and fuck you up." Later in the morning the same people were in the
5 apartment complex on the steps and a girl that was with them who he had seen before started
6 speaking to him like she knew him.

7 During the call, Sheffield rambles quite a bit, chatting with the dispatcher about all
8 kinds of things from stories from his past to his future plans.

9 On June 30, 2012 around 9:30 a.m., Sheffield contacted Detective Sanborn via
10 telephone and identified his neighbor Vincent Herrera as the person who had threatened him,
11 but he believed the situation had been resolved.

12 Vincent Herrera was a very close friend of Defendant. Robert Saul, the maintenance
13 man for the apartment complex, told police that Corona had told him that he was afraid of
14 Defendant and Herrera, and had seen Herrera fire a gun into the air outside the apartments.
15 William Coleman testified later that a couple days before the murder he saw Defendant
16 angrily tell Herrera that he was going to get his money back. In the hours after the murder
17 Herrera told the police he only heard the shot and knew nothing about the killing. On June
18 19, 2012, he admitted that he knew more than what he had told police. He said that
19 Defendant had found out that Corona was responsible for the burglary in his apartment.
20 About an hour before the shooting, Herrera heard Defendant knocking on Corona's
21 apartment door demanding that Corona pay him the money he owed him. Police officers
22 then arrived and contacted Corona. When the police left, Corona came to Herrera and told
23 him he was scared of Defendant. Herrera later awoke to the sound of the gunshot.

24 On July 11, 2012, around 10:00 a.m., Detective Sanborn contacted Sheffield via
25 telephone. In the Officer's Report, the detectives summarized Sheffield's statement as
26 follows:

27 Sheffield now stated "J" had been standing outside of Corona's
28 apartment door with another male, who he described as a light
skinned Hispanic male with blonde tipped dread locked hair. The

1 male with dreadlocks shot Corona and immediately handed
2 something to "J", then fled over the wrought iron fence west of
3 Corona's apartment door. "J" ran out of the apartment's security
4 gate, got into his black car and drove north bound on F Street.
Sheffield then heard a vehicle stop and the sound of a car door
locking, which he believed was "J" picking up the male with dread
locks on the street.

5 On July 26, 2012, around 10:13 a.m., Detectives Sanborn and Ivie reinterviewed
6 Sheffield in Sacramento, California. The interview was not recorded. In the Officer's
7 Report, the detectives summarized Sheffield's statement as follows:

8 Sheffield reiterated his account of seeing another male with
9 dreadlocked hair shoot Jaime Corona. He admitted he started to
10 have mental problems about 2-3 months ago to include
11 Alzheimer's. He conceded that he could be mixing up his
12 memories and as he explained his condition Sheffield was visibly
13 upset and started to cry. Sheffield planned to see his personal
doctor when he returned to Las Vegas to determine if he had
Alzheimer's disease. Detectives believe Sheffield was not
intimidated by the threats he received, but he was suffering from
mental health issues.

14 The apartment complex where the murder occurred is called the Island Court
15 Apartments; it is a small two-story complex of around 20 small apartments. The complex is
16 in a "U" shape with a courtyard in the middle. The neighbors typically know each other and
17 speak on a regular basis.

18 On July 31, 2012, detectives learned that Sheffield had been admitted to UMC
19 Hospital with heart problems and they responded and contacted him. He stated he was
20 having problems with his pace maker, but was feeling better. He also stated that his personal
21 doctor thought Sheffield had Alzheimer's disease.

22 In September of 2012, Sheffield died of natural causes.

23 Denise Williams, Defendant's girlfriend, who also lived in the apartments has always
24 maintained what she told police hours after the murder. She said that she lived with
25 Defendant and their young children. Their apartment was burglarized a few days prior to the
26 murder, and they had found out that Corona was responsible for it. This upset Defendant,
27 who confronted Corona about it and Corona admitted it and agreed to return the stolen
28 property and pay Defendant \$100.00. Corona then did return the property and paid

1 Defendant \$50.00. He still owed Defendant the remaining \$50.00. She said the day of the
2 murder (Father's Day), Defendant had left driving her Black Dodge Neon with plans to
3 watch the basketball game at his uncle's house. He left around 8:00 p.m. and she never saw
4 him again. She heard the gunshot while inside her apartment with her children. Police
5 spoke to her beginning around 4:25 a.m., and Defendant had still not returned. When asked
6 whether that was odd, she admitted it was unusual. She never stated that her brothers were
7 around the complex that night.

8 On August 21, 2012, Defendant gave a proffered statement to the detectives and
9 deputy district attorneys handling the case with his attorneys present. He blamed Denise
10 Williams' brother, Danny Williams, for the murder. He claimed that Denise Williams had
11 called her brother to defend her after Corona called her a "bitch" and Danny Williams had
12 responded to the location and killed Corona. Detectives then went and interviewed Denise
13 Williams again. She denied what Defendant had said and reiterated her original statement.

14 All in all Sheffield gave nine (9) different statements to police in the form of 911 calls
15 or statements. The defense asks this Court to admit one of them into evidence in the instant
16 case.

17 A. JAMES SHEFFIELD'S STATEMENTS GIVEN TEN DAYS AFTER THE
18 MURDER LACK ASSURANCES OF ACCURACY AND TRUSTWORTHINESS.

19 James Sheffield was 64 years old when he died of natural causes in September of
20 2012. Prior to his death, he had been having memory problems and other health problems
21 for several months. His personal doctor believed he had Alzheimer's Disease. Before his
22 death, Sheffield stated that his mind had been failing and that he believed he had been
23 mixing up memories due to his memory problems.

24 Sheffield initially called 911 moments after the murder occurred in the instant case.
25 He told the operator that he had not seen anything and did not know who was responsible for
26 the murder, he had only heard the gunshot. He was undressed and still in his apartment at
27 the time of the call. In the call, he was clearly trying to be helpful, but could give no details

28 //

1 and no information. He specifically stated that he only heard the shot and did not see the
2 murder.

3 When he filled out a voluntary statement about an hour later, he affirmed that he
4 could not identify a suspect and had only heard a gunshot.

5 A couple hours after the murder when he was interviewed by homicide detectives, he
6 gave the same basic story. In fact, he said he had just closed his door and laid down when he
7 heard the shot. He said he got up and looked outside saw a "blur", who he believed to be a
8 black male, run through the gate and then go north on F Street. He could not see the
9 person's face, and said he would not be able to recognize him again. He said he never saw a
10 car, but other people in the complex were talking about a black car in which the shooter fled.

11 A couple days later, he told detectives he actually had additional information. He had
12 heard and seen Defendant knocking on and yelling outside Corona's door prior to the
13 murder. Corona told Defendant he was going to call the police, but Defendant said he did
14 not care. Police arrived and left, and Defendant again began knocking on Corona's door and
15 demanding that he pay money. Sheffield was inside his apartment when he heard the
16 gunshot. He then walked out and saw a black male with medium build, about 5'6" or 5'7"
17 tall, wearing the same clothing he had seen Defendant wearing earlier, run away from the
18 scene.

19 It was not until June 27, 2012, ten (10) days after the murder, that Mr. Sheffield
20 called 911 to give a completely different story, which he later admitted may have been
21 mixing up memories. It completely contradicts his first four statements to police. This is the
22 statement that the defense would like to admit.

23 In the June 27, 2012 call to 911, James Sheffield is obviously confused. He later tells
24 detectives he may have been mixing up memories. When his June 27, 2012 statement is
25 examined, it is clear that he is confused and is mixing up memories. Some examples follow.

26 First example: Sheffield says in the call that Defendant is the one who hit Corona
27 over the head the day before the murder, requiring Corona to get staples, and that Sheffield
28 took the police down and pointed him out. Actually, there was never a suggestion that

1 Defendant committed that crime, and the person who committed it was arrested a short
2 distance away from the scene. In fact, Sheffield did call the police after that incident on June
3 16, 2012, and during the call, he never suggested that Defendant was involved, but did
4 describe the suspects.

5 Second example: Sheffield says in the call that the brother of the shooter (the one
6 without a moustache) shot off a gun outside the apartment complex. There was no report of
7 a shooting like that on the day of the incident. There had been a similar recent incident in
8 the complex when Vincent Herrera had shot a gun off, however.

9 Third example: during his first statements Sheffield is clear that he did not see a
10 vehicle, but states that other people had told him about the shooter fleeing in the black car.
11 During the June 27, 2012 call, he stated that the guy in apartment 18 (Defendant) handed the
12 shooter the gun and then drove the shooter away in a little black car.

13 Fourth example: Sheffield says in the call that after Corona had burglarized
14 Defendant's apartment, Defendant went to Corona's apartment and said, "I'm here to get my
15 shit back and if you don't give it back I'm gonna fuck you up." He said the police were
16 called after that and the police came and told Defendant "leave him alone and if we get
17 another call like this again we gonna come straight to you." Actually, police responded to
18 Corona's call to 911 about an hour prior to the murder, but never spoke to or even contacted
19 Defendant. Corona was extremely intoxicated and could not communicate well, but told
20 police he was making a loud music complaint about his upstairs neighbor, a black male with
21 a gun.

22 Fifth example: during the call Sheffield says that the same people who were
23 responsible for the murder came and threatened him on the morning of June 27, 2012.
24 However, he called detectives a few days later, and told them that his neighbor Vincent
25 Herrera was the person who had threatened him, and he believed the situation had been
26 resolved.

27 These are just some examples of Mr. Sheffield's memory apparent problems that are
28 clear in his June 27, 2012 call to 911. A month later, Sheffield would cry as he told

1 detectives about how his memory problems had been affecting him in the previous months,
2 and he conceded that his memory of the man with the dreads being the shooter may have
3 been a product of his mixing memories.

4 Based on the totality of the circumstances, Mr. Sheffield's statement from June 27,
5 2012 lacks assurances of trustworthiness and cannot be stated to be accurate in the least. It is
6 not admissible and should not be admitted in the instant case. The Defendant's attempt to
7 squeeze it into NRS 51.315, the "residual hearsay exception" completely fails. The
8 statement cannot meet the first prong of the rule, requiring that "its nature and the special
9 circumstances under which it was made offer strong assurances of accuracy." In fact, the
10 opposite is true. In the case of Sheffield's June 27, 2012 911 call, there are strong
11 assurances that it is inaccurate. It is of no consequence to this determination that it was a
12 call made to 911, as suggested by the defense. That fact makes it no more likely to be a
13 trustworthy statement.

14 The statement that Sheffield gives on June 27, 2012 completely contradicts the more
15 trustworthy statements that he gave immediately after the incident when it is less likely that
16 his mind could have changed his memory of the incident. Minutes after the murder in his
17 first 911 regarding the incident, he said did not see anything because he was lying in his bed
18 inside his apartment when he heard the shot. In his handwritten voluntary statement, he said
19 he could not identify a suspect. When he talked to police a couple hours later, he said the
20 same thing. It was not until ten (10) days later that his story completely changed with no
21 explanation. Later, he does explain that he may be mixing memories.

22 The defense also argues that the call made on June 27, 2012, ten (10) days after the
23 murder, should be admitted as an excited utterance under NRS 51.035. The State disagrees.
24 The call was not made soon after the "startling event." Sheffield was not still "under the
25 stress of excitement caused by the event" at the time of the call. The defense claims this
26 Court should consider cases they cite in which excited utterances were admitted up to an
27 hour and a half after the event, but cannot cite a case concerning a time lapse similar to that
28 in the instant case.

1 Any other way in which the defense argues the statement should be admissible in a
2 trial in the instant case would require that the statement be inherently trustworthy. It is
3 clearly not.

4 **CONCLUSION**

5 Based on the foregoing, the State respectfully requests that this Court deny the
6 motion.

7 DATED this 26th day of December, 2012.

8 Respectfully submitted,

9 STEVEN B. WOLFSON
10 Clark County District Attorney
Nevada Bar #001565

11
12 BY /s//NELL E. CHRISTENSEN
13 NELL CHRISTENSEN
14 Chief Deputy District Attorney
Nevada Bar #008822

15 **CERTIFICATE OF ELECTRONIC FILING**

16 I hereby certify that service of State's Opposition was made this 26th day of
17 December, 2012, by Electronic Filing to:

18 RANDY PIKE, Special Public Defender
19 E-mail Address: RPike@ClarkCountyNV.gov

20 CHARLES CANO, Special Public Defender
21 E-mail Address: canoca@ClarkCountyNV.gov
KFitzger@ClarkCountyNV.gov

22 Shellie Warner
23 Secretary for the District Attorney's Office

24
25
26
27
28 mmw/GCU

Exhibit “1”

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT

Event #

120617-4103

THIS PORTION TO BE COMPLETED BY OFFICER

Specific Crime <u>MURDER WITH DEADLY WEAPON</u>	Date Occurred <u>06/17/12</u>	Time Occurred <u>2238</u>
Location of Occurrence <u>1416 FST #10 LV, NV 89106</u>	Sector/Beat <u>W-6</u>	<input checked="" type="checkbox"/> City <input type="checkbox"/> County

Your Name (Last / First / Middle) <u>SHEFFIELD, JAMES (NMN)</u>						Date of Birth <u>7-15-1948</u>		Social Security # <u>267-B-9582</u>	
Race <u>BLK</u>	Sex <u>M</u>	Height <u>5'5"</u>	Weight <u>160</u>	Hair <u>BLD</u>	Eyes <u>BROWN</u>	Work Schdl. (Hours) <u>NONE</u>	(Days Off) <u>ALL</u>	Business / School <u>N/A</u>	
Residence Address: (Number & Street) <u>1416 FST</u>			Bldg./Apt. # <u>9</u>	City <u>LAS VEGAS</u>		State <u>NV</u>	Zip Code <u>89102</u>	Res. Phone: <u>702-318-1072</u>	
Bus. (Local) Address: (Number & Street)			Bldg./Apt. #	City		State	Zip Code	Bus. Phone: <u>SAME</u>	
Best place to contact you during the day <u>AT HOME</u>			Best time to contact you during the day <u>ANY TIME</u>				Can You Identify <input type="checkbox"/> Yes the Suspect? <input checked="" type="checkbox"/> No		

DETAILS I heard (1) GUN SHOT at Apt. 10, 1416 FST LAS VEGAS NV and saw JAMES in Apt. 10 lying on the floor. Shot in the chest.

I HAVE READ THIS STATEMENT AND I AFFIRM TO THE TRUTH AND ACCURACY OF THE FACTS CONTAINED HEREIN. THIS STATEMENT WAS COMPLETED AT (LOCATION) 1416 FST #10 LV, NV 89106 ON THE 17 DAY OF JUNE AT 2345 (AM / PM) (PM).

Witness/Officer:

(SIGNATURE)

Witness/Officer:

LVMPD 88 (REV. 6-08)

P# 14462

SIGNATURE OF PERSON GIVING STATEMENT

0131

Exhibit “2”

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
PAGE 1

EVENT #: 120617-4103

SPECIFIC CRIME: HOMICIDE

DATE OCCURRED: 06-17-12

TIME OCCURRED: 2238 HOURS

LOCATION OF OCCURRENCE: 1416 F STREET #10

CITY OF LAS VEGAS

CLARK COUNTY

NAME OF PERSON GIVING STATEMENT: JAMES SHEFFIELD

DOB: 07-15-48

SOCIAL SECURITY #:

RACE:

SEX:

HEIGHT:

WEIGHT:

HAIR:

EYES:

HOME ADDRESS: 1460 F STREET
APARTMENT 9
LAS VEGAS, NV

PHONE 1: 318-1072

WORK ADDRESS:

PHONE 2:

The following is the transcription of a tape-recorded interview conducted by DETECTIVE D. BOUCHER, P#4636, LVMPD HOMICIDE SECTION, on 06-17-12 at 0103 hours. Also present is Detective J. LaFreniere, P#7570.

Q: This is Detective D. Boucher, P#4636 we'll be conducting an interview under event 120617-4103, also present is Detective LaFreniere, P#7570. The interview is taking place on 06-17 of 2012 at 0103 hours. I'm gonna be speaking with James Sheffield. His birthday is 07-15 of 1948. He has a contact phone number of 318-1072 and he lives at 1460 F Street, Building...or excuse me...Apartment #9, uh, Las Vegas, Nevada. And there was a shooting in your apartment complex

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
PAGE 2

EVENT #: 120617-4103
STATEMENT OF: JAMES SHEFFIELD

earlier tonight and ultimately you ended up being one of the people that called 9-1-1.

A: Yes.

Q: Um, let's, let's back up. Earlier tonight, were there any problems here earlier? I, uh, I understand the police were here earlier tonight maybe three or four hours before the shooting. Were you aware of that?

A: Yeah, I, I heard that. I never saw the policemen out here.

Q: Okay, you just heard it?

A: Yeah, but when I did come out my friend told me, see yeah the police was out there and they were at, uh, Jaime's door...at James's door. The one who got shot. Uh, now like I said, uh, on the 16th I'm the one that called the police when he was getting beat and robbed, uh, at night.

Q: Right.

A: Yeah.

Q: Yeah, and we know about that incident...

A: Yeah.

Q: ...and we know where the people from that incident were that night.

A: Yes.

Q: The incident tonight, do you know anything about that what happened? Did anybody...

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
PAGE 3

EVENT #: 120617-4103
STATEMENT OF: JAMES SHEFFIELD

A: No.

Q: ...say who he had the problem with?

A: No.

Q: Okay, um, so then let's fast forward then a little bit to, um, a little bit later there's, uh, a shooting you hear, you hear gunshots...

A: Yeah.

Q: ...let's talk from when you hear the gunshots till then.

A: I heard one gunshot.

Q: Okay.

A: Then, uh, the gate opened and I saw a blur go this...go towards, uh, go north right here on F Street.

Q: Okay, when you say, uh, uh, blur you see, uh, it's a person running?

A: Running yeah.

Q: Okay, could you tell if it was a male or a female?

A: Yeah, you could tell it was a male.

Q: Okay, it's a male.

A: Yeah.

Q: And was it a black male, white male?

A: Yes, he was black.

Q: Okay, any, any idea what kinda clothes?

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
PAGE 4

EVENT #: 120617-4103
STATEMENT OF: JAMES SHEFFIELD

A: He had on a some light colored jeans, a grey and black hoodie 'cause he had the hood up, and that's the blur I saw go by.

Q: Okay.

A: Couldn't see his face or anything like that.

Q: Could you, uh, as far as tall or short and.

A: He was, he was a little taller than I am. I'm 5'5" and he was a little taller than me.

Q: Okay, so 5'7", 5'8" that tall?

A: Yeah, 5'6", 5'7", yeah something like that.

Q: Okay, 5'6", to 5'7".

A: And it looked like he weighed about I would say...I weigh 160, he probably weighted about 170.

Q: Okay.

A: If he weighted that much.

Q: So medium build than?

A: Yeah.

Q: Okay, um, prior to the shooting did you hear any arguing?

A: No.

Q: Okay, so the shoot...the, the, the gunshot is actually the first thing you hear.

A: Yeah, 'cause I, I had my bedroom...I mean my living room door closed. I had my air condition on and I just cut it off 'cause I was just finishing watching the, the

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
PAGE 5**

**EVENT #: 120617-4103
STATEMENT OF: JAMES SHEFFIELD**

basketball game and I was, uh, messing with him about it 'cause my team won and, um, I was yeah I'm with Miami yeah, and we were, uh, talking about it and he said, yeah I'm gonna go back to bed, and I said, me too. So I left my door open and I was laying there and then something said, just get up and close your door. I got up and I closed my door. When I closed my door I laid down and the next thing I know I heard pow and it was real loud, real loud.

Q: And did you call the police first or did you run outside to see what happened first?

A: No, I was standing in the doorway and nobody outside said they had a phone. I say, I got one and I reached in there and got it off the, off the chair and I called 9-1-1.

Q: Okay, and then once you call 9-1-1 did...is that did you go up to the apartment and take a look in?

A: I walked by there and I could see him laying there on the floor with a hole right in his chest right here.

Q: Okay, and were there other people inside taking care and trying to?

A: Yes, uh, I think Dimples was trying to give him mouth to mouth and, and, and her, her and I think Billy both was trying to survive him and I just saw his eyes roll back in his head...

Q: Okay, so there was.

A: ...and I just turn, turned and walked away.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
PAGE 6

EVENT #: 120617-4103
STATEMENT OF: JAMES SHEFFIELD

Q: So you didn't need to go in the apartment, then you didn't go in?

A: No.

Q: Okay.

A: I just looked in the door and I just turned and walked away when I saw his eyes roll back in his head.

Q: Okay, um, all right, and is there anything else I didn't ask you about that might be helpful?

A: I don't know.

Q: You wouldn't be able to recognize the guy again...

A: No.

Q: ...based on what you said?

A: No.

Q: Okay.

A: And like I said I never saw his face but like I say he had on a light colored jeans, they were rolled up at the, at the ankle and he had on grey and black hoodie.

Q: Now you mentioned something and I can't remember if you mentioned it as soon as you got in the car before I turned on the tape or since we've been on the tape. But that somebody said he got into a black car, do you know who said that?

A: They said, they said he got...there was a black car waiting on somebody right there man, they say he jumped in the black car. I never saw the car.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
PAGE 7

EVENT #: 120617-4103
STATEMENT OF: JAMES SHEFFIELD

Q: Right, do you know who said that though?

A: I can't remember who said it.

Q: Was it one of the people sitting out here though?

A: I think so.

Q: Okay, so when we talk to them we should _____.

A: One of them said something about it would be...he got in a black car and they took off down the street. See I don't know which way he went after he came out the gate I just know he went this way...he went north.

Q: Okay, and while you've all been sitting here has anybody said that they saw the person more than what you were describing?

A: The only person that said that they saw him was Loretta 'cause she was in there.

Q: In the apartment.

A: Yeah.

Q: Okay, all right and she's the one's that's in the car with the other detective.

A: Car with the other detective yes.

Q: Okay, all right.

JL(JASON LAFRENIERE): _____ real quick, did you the guy you saw running, did he have anything in his hands at all that you, that you noticed?

A: No, not that I, that I could see.

JL: Okay, all right.

**LAS VEGAS METROPOLITAN POLICE DEPARTMENT
VOLUNTARY STATEMENT
PAGE 8**

**EVENT #: 120617-4103
STATEMENT OF: JAMES SHEFFIELD**

A: Yeah.

JL: That's it.

Q: Okay, all right we're gonna conclude the interview then it's, uh, 0109 hours.

**THIS VOLUNTARY STATEMENT WAS COMPLETED AT ON THE 17TH DAY OF
JUNE 2012 AT 0109 HOURS.**

**DB:ct
12V0690**


CLERK OF THE COURT

1 MAEV
DAVID M. SCHIECK
2 Special Public Defender
NSB 0824
3 RANDALL H. PIKE
Assistant Special Public Defender
4 NSB 1940
CHARLES A. CANO
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canoca@clarkcountynv.gov

9 Attorneys for Defendant

10 DISTRICT COURT
11 CLARK COUNTY, NEVADA

12 THE STATE OF NEVADA

13 Plaintiff,

14 vs.

15 JASON JONES,

16 Defendant.
17

CASE NO. C-12-285488-1
DEPT NO. 21

18 Exhibit A in Support of
Defendant's Motion in Limine to Admit Evidence
19 of and Contents of Recorded 911 Report

20 Date: 1-8-2013
Time: 9:30 a.m.

21 COMES NOW, Defendant, JASON JONES, by and through his attorneys, David M.
22 Schieck, Special Public Defender, Randall H. Pike, Assistant Special Public Defender and
23 Charles A. Cano, Deputy Special Public Defender, and submits the attached Transcript of the
24 audio transcription of 911 call in support of his Motion in Limine to Admit Evidence of and
25

26 ...


27 ...
28

1 Contents of Recorded 911 Report previously filed. The hearing of the motion is set for January
2 8, 2013.

3 DATED this 26th day of December, 2012.

4 Respectfully submitted
5 DAVID M. SCHIECK
6 SPECIAL PUBLIC DEFENDER

7 /s/ RANDALL H. PIKE

8 
9 RANDALL H. PIKE
10 CHARLES A. CANO
11 Attorneys for Jones

12 CERTIFICATE OF ELECTRONIC FILING

13
14 I hereby certify that service of the above and foregoing, was made on January 3, 2013
15 by Electronic Filing to:
16

17 DISTRICT ATTORNEY'S OFFICE

18 email: pdmotions@ccdany.com

19 /s/ Kathleen Fitzgerald

20 _____
21 Legal Executive Assistant for
22 Special Public Defender
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EXHIBIT A

Case: State of Nevada v. Jason Jones
Transcript Testimony of **Audio Transcription -**
911 Calls

Date: December 19, 2012
Volume:

Job #: 586841

CERTIFIED COPY

Sousa Court Reporters
Court Reporting & Video Conferencing
Las Vegas - California
702-765-7100/ 24-hr.
www.sousa.com

Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 DISTRICT COURT
2 CLARK COUNTY, NEVADA
3
4
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6
7
8 THE STATE OF NEVADA,)
9)
10 Plaintiff,)
11) CASE NO. C-12-285488-1
12 vs.) DEPT NO. 21
13)
14 JASON JONES,)
15)
16 Defendant.)
17
18
19
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21
22
23
24
25 Transcribed by Kathy Hoffman

Page 1

Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 PROCEEDINGS

2

3 TELEPHONE VOICE: June 27, 2012, one
4 hour, 5 minutes and 58 seconds p.m.

5 911 OPERATOR: Metro police, Miller.
6 (Inaudible).

7 MR. SHEFFIELD: Hi. I don't need -- I
8 don't need an officer to come out. I just want to
9 clarify something that happened here this morning.

10 911 OPERATOR: Okay.

11 MR. SHEFFIELD: I witnessed a guy getting
12 killed in the apartment complex at 1416 F Street.
13 I stay in Apartment 9. The guy that was killed
14 stay in Apartment 10 right next door to me. Okay?
15 I know his first name was Jaime.

16 And the guy that actually did the
17 shooting, he's got a brother. They look like twins
18 except one don't have a mustache and the other one
19 got dreds. And what I thought he had did was cut
20 his mustache off and clipped his hair until he came
21 by here and I looked at him. And I told my
22 apartment manager that he's the one that actually
23 did the shooting.

24 911 OPERATOR: The one with the dreds or
25 the one with the --

Page 2

Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 MR. SHEFFIELD: The one with the dreds.

2 911 OPERATOR: Okay.

3 MR. SHEFFIELD: He did the shooting. The
4 guy in Apartment 18, he handed him the gun, and he
5 the one that drove him away in a little black car.

6 911 OPERATOR: When did that happen?

7 MR. SHEFFIELD: Okay. That happened that
8 Friday before Father's Day. That Friday before
9 Father's Day they beat him in the head. He got 17
10 staples in his head that Friday. That Sunday, that
11 evening, they shot and killed him.

12 Friday the guy -- the guy's brother with
13 the mustache that I thought it was, he fired the
14 gun and told -- everybody in the complex heard it.
15 He said, see, it works. And that night, they
16 kicked his door in and shot him right in the chest,
17 and he died that same night.

18 I was the one that called the police that
19 night. I was the one that called the police that
20 Friday night. And first my sister say don't get
21 involved with them, because they threatened me last
22 night about coming by here to -- and the way they
23 said was "fuck me up".

24 So I'm having Alarmco put alarm on my
25 apartment, and the lady from the -- her name

Page 3

Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 Maria Santiago or something like that. She told me
2 go and have it -- if you do -- if they do -- it's
3 not a subpoena right now. If they do go to court,
4 we'll subpoena you.

5 And everybody knows, my apartment manager
6 and my neighbors know I'm going to my sister's in
7 California. And whenever they subpoena me, I'll
8 come back.

9 911 OPERATOR: Okay.

10 MR. SHEFFIELD: Yeah. Most of them think
11 I'm leaving for good. I got color TV's in there.
12 I've got wide screen TVs, and I ain't going to go
13 nowhere. Shit, I already told them -- I told the
14 manager when I first moved in here, I'm here for
15 the duration.

16 911 OPERATOR: Okay. Did they threaten
17 you today they said they were going to come --

18 MR. SHEFFIELD: That was this morning.
19 No, not in -- yeah, that was this morning. It was
20 like 12:30, 1 o'clock.

21 911 OPERATOR: These same people?

22 MR. SHEFFIELD: Yeah. They drove by and
23 did wheelies until I came out my door. See, I lay
24 in my living room because I'm here by myself
25 because I'm disabled.

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Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 911 OPERATOR: Uh-huh.

2 MR. SHEFFIELD: And it's been a habit for
3 like 40 years. I leave here, I'm 63. When I come
4 back, I'll be 64 years old. My birthday is like in
5 19 days. So I'm going there for a family reunion.

6 And I heard the windows, and I opened my
7 doors, and they say, "Yeah, motherfucker, you see
8 too much. We going to come back and fuck you up."
9 And I stepped out and I looked upstairs. There's
10 two floors. I looked upstairs and wasn't nobody up
11 there. And they say, no, we talking to you
12 motherfucker. And I looked -- and I was the only
13 person out there in the courtyard.

14 911 OPERATOR: Okay.

15 MR. SHEFFIELD: Yeah, he made it a point
16 to let me know he was talking to me. I told this
17 to the police when they came out this morning.
18 Because they came and sat on my -- on the steps
19 right by my apartment. To go upstairs to the
20 second floor is right by my double window. And I
21 get up in the morning like 5 o'clock and I cook
22 breakfast, have me a cup of coffee.

23 I happened to look out there. So I
24 opened my door and this girl that was with them
25 that day, I never seen -- I seen her, but I never

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Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 talked to her in my life. And she talked -- she's
2 speaking to me like she knew me for every day.
3 Hey, how you doing today? (Inaudible) seeing you.
4 And I say, whatever. I say, I don't even know you
5 and walk back into my house, and they sat there and
6 started laughing.

7 911 OPERATOR: Okay. Did you tell the
8 officers that this morning?

9 MR. SHEFFIELD: Yes.

10 911 OPERATOR: Okay.

11 MR. SHEFFIELD: The only thing I got to
12 say that they look almost like twins, same height
13 and everything. Except the one with the dreds, the
14 one that did the shooting. The one that didn't
15 have the dreds fired the gun earlier that day, and
16 I guess he gave it to him, and that's the gun that
17 they used.

18 I don't know what they did with the gun,
19 because, like, him and Jay left from here. And Jay
20 didn't come back. And finally the police caught
21 him, and they had him under arrest for the murder.
22 And that's why I told them, he ain't the one that
23 did it. Because when they put the staples -- got
24 -- beat him in the head, I took the police right
25 down there where the guy was and pointed him right

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Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 out.

2 911 OPERATOR: Okay.

3 MR. SHEFFIELD: Yeah.

4 911 OPERATOR: All right. Well, we'll
5 get -- when are you going to California?

6 MR. SHEFFIELD: On the 8th of July.

7 911 OPERATOR: Okay. So not today or
8 anything?

9 MR. SHEFFIELD: No. I'm -- I'm going on
10 the 8th. I was supposed to come back on the 27th,
11 but Ms. Maria -- whatever her name -- I can't
12 remember now. I got it written down. She told me,
13 she said, take as long as you want, and if they do
14 go to court, we'll get in contact with you.

15 911 OPERATOR: Okay.

16 MR. SHEFFIELD: Yeah. Because the one
17 that hit him in the head is not the one that hit
18 him in the head. The one that hit him in the head
19 was Jay. That's the black dude where he's -- he's
20 black and Cuban. He's black and Cuban.

21 Because I guess Jaime went up to his
22 apartment and went in his house, took his cell
23 phone, took a VCR and some other stuff, and he was
24 trying to -- he said, I'm here to get my shit back,
25 and if you don't give it back, I'm going to fuck

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State of Nevada v. Jason Jones

1 you up.

2 And Jaime said call the police. I called
3 the police that night. The police came, but ain't
4 nothing actually happened between the two of them,
5 and he told them -- he asked him where do you stay.
6 He say he stay upstairs. He say you go over there
7 and just leave him alone. And if we get another
8 call out here again, then we going to come straight
9 to you. And I closed my door and went back inside.

10 And then that Father's Day, as soon as it
11 got dark, shot him -- shot him in -- it was about
12 ten o'clock, shot him right in the chest. And I
13 went over there and I called the police. And when
14 I got to his apartment, it was like ten feet from
15 my door. And when I got there, I watched him take
16 his last breath and his eyes rolled back in his
17 head. And I came back in my apartment.

18 Then I -- he don't -- he didn't speak
19 English that good because he's Hispanic. And I sat
20 here and I cried because me and him was just
21 starting to be friends. Because when we first met,
22 the police was there because him and his brother
23 used to fight all the time on Fridays when they'd
24 get drunk. And his brother left and went to
25 San Diego -- San Diego or somewhere, but he was

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1 there by himself with his son.

2 And just so happened, on Father's Day,
3 his son was with his ex-wife. So he was there by
4 himself. Come to find out another young lady, her
5 name Loretta Coleman, I think. She should be on
6 the thing. She was in the apartment when he got
7 shot.

8 911 OPERATOR: Who were the ones that
9 threatened you this morning?

10 MR. SHEFFIELD: I don't know their name.
11 I told you I don't know.

12 911 OPERATOR: Oh, okay. Just driving
13 through the complex, you said?

14 MR. SHEFFIELD: They was on the street
15 right there doing -- we call them donuts where they
16 spin the car around in the street and the tire be
17 burning but they ain't going nowhere. They making
18 like a circle.

19 911 OPERATOR: Right.

20 MR. SHEFFIELD: Yeah. They were doing
21 that, I guess, to get my attention. Then when I
22 stepped out, that's when they made the comment, and
23 I went all the way out in the courtyard and looked
24 upstairs, because like I said there's a second
25 floor, and wasn't nobody out there. And they said,

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Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 yeah, we talking to you, motherfucker.

2 911 OPERATOR: Okay.

3 MR. SHEFFIELD: He said it like that.

4 The girl in the other apartment over here, Dimples
5 (ph), they tried to give him mouth to mouth, and
6 just as she tried, he died.

7 And they made everybody in that apartment
8 complex go across the street and said don't talk
9 about it. And I kept saying, well, I said, you all
10 just leave that shit alone. Because my sister told
11 me from California, don't get involved, James. She
12 said, don't get involved because you see how they
13 killed him. They might try to come and kill you.

14 And then they threatened me this morning,
15 and that really pissed me off. I said, well, I'm
16 going to tell the truth. I called the manager, and
17 I told him, I know who shot him. And Gabriel said,
18 wait till you get to court. If they get to court,
19 then you can tell them in court.

20 As soon as I see his face, if he don't
21 cut his hair or anything, he's a -- he's a Hispanic
22 dude with dred locks, and it's very rare that you
23 see them like that.

24 911 OPERATOR: Right, right.

25 MR. SHEFFIELD: Yeah. Like the Jamaicans

Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 have the dread locks. Very rare.

2 911 OPERATOR: Right, exactly.

3 MR. SHEFFIELD: Okay. I just wanted to
4 clarify that.

5 911 OPERATOR: All right. But you don't
6 want us to come out.

7 MR. SHEFFIELD: No.

8 911 OPERATOR: But I'm going to send
9 somebody to patrol for you, though, okay?

10 MR. SHEFFIELD: Okay. It's no problem.
11 They supposed to be over there now. They gave the
12 girl in Apartment 1, who -- where the guy was
13 hanging out there with the gun, and the one in 18,
14 the one that drove him away from here, they evicted
15 them today and told them don't get caught back on
16 the property.

17 They told everybody they're going to
18 change all the locks and told everybody you're
19 responsible for whoever be here, and if you have a
20 bunch of people coming by -- and at one time, I did
21 too. Because I was single, and I meet girls and I
22 used to tell them to come over to my house.

23 911 OPERATOR: Right. Right.

24 MR. SHEFFIELD: I don't do that no more.

25 My sister say you need to stop that.

Deposition of: Audio Transcription - 911 Calls
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1 911 OPERATOR: Okay.

2 MR. SHEFFIELD: Yeah. Because I used to
3 do that. When we were (inaudible) like that. And
4 my sister -- I hate to say it like this, my sister
5 used to look at me and say, you ain't nothing but a
6 little ho. (Laughing). And I mean, that's how me
7 and her talk.

8 911 OPERATOR: Right. Right.

9 MR. SHEFFIELD: Yeah, okay? That's all I
10 wanted to clarify.

11 911 OPERATOR: What kind of car were they
12 driving this morning?

13 MR. SHEFFIELD: It was two cars. She's
14 got like a brown -- oh, I don't even know the make
15 because like I say, I don't -- you have to park the
16 cars on the back side of the building, and I don't
17 have a car. So I very rarely go back there where
18 they park at.

19 911 OPERATOR: Oh, okay.

20 MR. SHEFFIELD: They also had like a new
21 car, like it was a rental car or they may have just
22 bought another car.

23 911 OPERATOR: Do you know what color
24 that one was?

25 MR. SHEFFIELD: It was like a gray-ish

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Deposition of: Audio Transcription - 911 Calls
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1 color.

2 911 OPERATOR: Like a sedan or?

3 MR. SHEFFIELD: Well, four doors.

4 911 OPERATOR: 4-door, okay.

5 MR. SHEFFIELD: Yeah.

6 911 OPERATOR: Was the brown car a 4-door

7 as well?

8 MR. SHEFFIELD: Huh?

9 911 OPERATOR: Was the brown car a sedan

10 as well?

11 MR. SHEFFIELD: Four doors with the back

12 window broke out on one side. The two brothers,

13 the one I say got the dread locks and the other one,

14 he got a girlfriend over in what you -- you know

15 where Naked City is?

16 911 OPERATOR: Yeah, I've heard of it.

17 Yeah.

18 MR. SHEFFIELD: Okay. They went over

19 there to confront the guy, so he brought his

20 brother, his girl and his little baby with him.

21 And they got to fighting and they broke the window

22 out. I think it's on the back passenger side.

23 911 OPERATOR: Okay.

24 MR. SHEFFIELD: Yeah. Because right now

25 they park their car right there across the street

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Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 where you can see it, but you can -- from my --
2 from where I sit on the porch at, you can only see
3 the front of it until they pull off.

4 911 OPERATOR: Okay. And these are the
5 people related to the shooter guy?

6 MR. SHEFFIELD: Yes.

7 911 OPERATOR: Okay.

8 MR. SHEFFIELD: Well, one that --

9 911 OPERATOR: They're all in that
10 building or apartment?

11 MR. SHEFFIELD: No, they made them move
12 out today. They evicted them today.

13 911 OPERATOR: Oh, so these people that
14 are creating the problem, they're the ones that are
15 getting evicted today?

16 MR. SHEFFIELD: Yes.

17 911 OPERATOR: Oh.

18 MR. SHEFFIELD: Because the manager said
19 he's going to turn over a new leaf. Okay? We got
20 a gated community, and everybody's going to get a
21 new gate key. They going to put a punch code in
22 there only for emergency vehicles.

23 911 OPERATOR: Okay.

24 MR. SHEFFIELD: Police, fire department,
25 stuff like that. And nobody else -- the one that

Deposition of: Audio Transcription - 911 Calls
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1 we have on there now, every -- how you say it,
2 every Tom, Dick and Harry that comes by here knows
3 that gate code.

4 911 OPERATOR: Right, right.

5 MR. SHEFFIELD: Yeah. I leave my key in
6 here in the house when I go to the trash can
7 because it's outside, and I just punch it in and
8 walk on in the gate.

9 911 OPERATOR: Okay.

10 MR. SHEFFIELD: And you're totally
11 responsible for your guests. And if you have, like
12 say, people coming by to see you all the time,
13 we're supposed to -- I'm going to start getting a
14 nurse to come by twice a week to cook for me
15 because I -- right now my legs are swole real bad.
16 I got everything wrong with me but my kidneys and
17 diabetes, but I got everything else. Pacemaker,
18 I've had heart attacks, I've had strokes.

19 911 OPERATOR: Okay. And (inaudible).

20 MR. SHEFFIELD: James.

21 911 OPERATOR: Uh-huh.

22 MR. SHEFFIELD: Sheffield,
23 S-h-e-f-f-i-e-l-d, and I live in Apartment
24 Number 9.

25 911 OPERATOR: Okay. All right.

Deposition of: Audio Transcription - 911 Calls
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1 MR. SHEFFIELD: You want my cell?

2 911 OPERATOR: I have a number here.

3 318-1072?

4 MR. SHEFFIELD: Yeah. Now, with the new
5 alarm system, Alarmco's coming to put in the alarm
6 system for my apartment.

7 911 OPERATOR: Uh-huh.

8 MR. SHEFFIELD: I'm going to get a phone
9 on the 29th from Cox Cable because there wasn't no
10 phone line in here, but I need to phone line to go
11 with the alarm system.

12 911 OPERATOR: Right, right.

13 MR. SHEFFIELD: Yeah, because I told him,
14 I'm here for the duration. And my sister want me
15 to move back, and I say I'm not going to run from
16 them. I say, you know, all my life I've always
17 tried to tell the truth.

18 I've been a Sunday school superintendent
19 for my kids there in Mississippi for like five
20 years. They put me on that board, and every time I
21 try to get off, they -- no, you ain't going
22 nowhere. The kids love you and I love them.

23 911 OPERATOR: That's right. You're a
24 good guy.

25 MR. SHEFFIELD: Yeah. And I said I'm

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Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 going to get back into it. And my sister say, you
2 should have been doing that. Because I started
3 messing around with the girls and the drugs.

4 911 OPERATOR: Right.

5 MR. SHEFFIELD: Yeah. My sister say come
6 here, and you better not act like you were. And I
7 say all I want to do is eat, sleep and go play
8 pinochle.

9 911 OPERATOR: (Laughing).

10 MR. SHEFFIELD: Yeah, I love pinochle.

11 911 OPERATOR: It's a good game.

12 MR. SHEFFIELD: Yeah. Three times a week
13 there in California. And the one place where they
14 play here, if it wasn't so far, I'd go there. But
15 I got friends there that got cars. My sister got
16 three cars. I got a couple of friends that got
17 cars. And when I say I need a ride, and they come
18 and pick me up and we go play.

19 911 OPERATOR: Okay.

20 MR. SHEFFIELD: All right?

21 911 OPERATOR: All right.

22 MR. SHEFFIELD: That's all I wanted to
23 do. All right. Thank you.

24 911 OPERATOR: You're welcome, sir.

25 MR. SHEFFIELD: All right. Bye-bye.

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Deposition of: Audio Transcription - 911 Calls
State of Nevada v. Jason Jones

1 911 OPERATOR: Bye-bye.
2 (Whereupon, the recording ended.)
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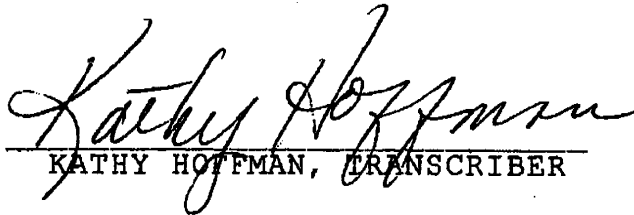
TRANSCRIBER'S CERTIFICATE

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

I, Kathy Hoffman, do hereby certify:
That I listened to the recording of 911
calls from James Sheffield for the above entitled
case;

That I thereafter transcribed said
recording into a typewritten transcript and that
the typewritten transcript of said proceedings are
a complete, true, and accurate transcription of
said recording to the best of my ability to hear
and understand the recording.

I further certify that I am not a
relative or employee of counsel involved in said
action, nor a person financially interested in said
action.


KATHY HOFFMAN, TRANSCRIBER

DISTRICT COURT
CLARK COUNTY, NEVADA

Defendant.

CASE NO. C285488-1
DEPT. XXI

RECORDER'S TRANSCRIPT OF HEARING RE:
DEFENDANT'S MOTIONS

RANDALL H. PIKE, ESQ.
Assistant Special Public Defender

LAS VEGAS, CLARK COUNTY, NV., THURS., JAN. 3, 2013

1
2 THE COURT: Mr. Pike.

3 MR. PIKE: Thank you, Your Honor. We received a guilty plea agreement in
4 this matter. I contacted the Court yesterday afternoon indicating that the matter had
5 been resolved. If we could continue this over for the entry of plea to either Friday or
6 sometime next week so I can go over it with my client.

7 THE COURT: All right.

8 MR. PIKE: He's present in custody.

9 THE COURT: Is this your case, Ms. Christensen?

10 MS. CHRISTENSEN: Yes, Your Honor.

11 THE COURT: Any objection to passing this till Tuesday for entry of plea? Not
12 Tuesday, we'd have to go to whatever day Ms. Husted says we can do it.

13 THE CLERK: I think we can do it on Thursday, January 7th at 9:30.

14 THE DEFENDANT: Your Honor?

15 THE COURT: Yes, Mr. Jones.

16 THE DEFENDANT: I ask the Court's permission to get married to my fiancé?

17 THE COURT: Did I approve that? I think I approved that order, didn't I?

18 MR. PIKE: Your Honor, I haven't submitted it yet, but I --

19 THE COURT: Okay. But it was on for a motion, correct, and I --

20 MR. PIKE: I'll submit the motion on behalf of my client.

21 THE COURT: Okay. Typically I approve those if there's no objection.

22 MR. PIKE: I'll also prepare the paperwork for him and submit an order.

23 THE DEFENDANT: Is it all right? Is it approved?

24 MS. CHRISTENSEN: Well, I haven't seen anything in writing yet.

25 THE COURT: Okay. We haven't seen who it is. You know, we want to make

1 sure it's not somebody who's going to be victimized or there's not some other
2 reason for it. It's not, you know, a witness in the case or something like that.

3 So, Mr. Pike will submit a request. He'll say who it is. Then the State
4 will have an opportunity to object. Typically they don't, but there may be a reason in
5 this case that they would. And assuming there isn't, typically I grant them. I can't
6 promise you I'm going to grant it because I haven't seen -- I don't know who this
7 person is, what the circumstances are or anything like that.

8 So Mr. Pike will submit the paperwork, and he'll serve Ms. Christensen
9 with it.

10 THE CLERK: Judge, there's another matter on the 8th. Can I continue it to
11 the 10th?

12 THE COURT: Oh, that's fine.

13 MS. CHRISTENSEN: Your Honor, we actually have a -- maybe that's what
14 Ms. Husted meant, but we have a couple motions on for the 8th. Could we pass it
15 for that date, or are you guys not doing anything on the 8th?

16 THE COURT: Here's -- no, we are doing things on the 8th, but our calendar is
17 so full for the 8th already that Ms. Husted is not setting any other matters on the 8th.

18 MS. CHRISTENSEN: We're already on the 8th in this case for a couple
19 motions.

20 THE COURT: So why don't we just move the motions to the 10th?

21 THE CLERK: That's what I was saying.

22 MS. CHRISTENSEN: Okay.

23 MR. PIKE: That would be fine.

24 THE COURT: And assuming the motions will all be moot if he enters his plea.

25 MR. PIKE: That's correct. That's the reason I indicated we wouldn't be

1 arguing it today.

2 And I'll submit the request for the order allowing for a marriage. It's his
3 long-time girlfriend and the mother of his child. So I don't think there will be a
4 problem.

5 THE COURT: All right. Thank you.

6 And, Mr. Pike, why don't you try to get that done prior to our next
7 hearing so Ms. Christensen then will have an opportunity to read that over, and if
8 she wants to make an objection or anything on the record, she can do that.

9 MR. PIKE: If I can just go ahead and set it on that date, I'll go ahead and get
10 a copy to the DA tomorrow.

11 THE COURT: Any objection?

12 MS. CHRISTENSEN: No, that's fine.

13 -oOo-

14 ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video
15 proceedings in the above-entitled case.

16 

17 JANIE L. OLSEN
18 Recorder/Transcriber
19
20
21
22
23
24
25

my copy

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA

JAN 10 2012 2013

BY, TIA EVERETT, DEPUTY

STATE OF NEVADA

) Case No.: C-12-285488-1

Plaintiff,

) Dept. No.: 25

vs.

) Docket No.: _____

JaSon Jones

Defendant

"Motion to Dismiss Counsel"

(1) According to my 6th and 14th amendment rights I have the right to confront my accusers.

(2) I feel I'm being denied my "Right" to effective "counsel" due to the "knowledge" and "facts" of his actions.

(3) "Counsel" has not returned any of my "phone calls," I've left numerous "messages"

(4) "Counsel" has also stated to me that they were "NOT" "P.D's," but that they were "state" employees, working for and "with" the "state" against me and that there was "Nothing" that I can do about it, because "it's not what I "know", but what I can "prove".

(5) "Counsel" stated to me that I was "Guilty" and that,

I was going to "prison" anyway, and if I didn't like it, then I was going to have to acquire a "private attorney", that would be able to "Prove" my innocence.

(6) "Counsel" completely "disregarded" any and all of my "views" during "Pre-trial", not listening to my "request", completely "ignoring" my "request" and "views", but gave more attention to his "phone" even to the extent of "texting" on his "phone" to a "Jonathan". (I saw the incoming call)

(7) I have an unqualified right to "legal assistance" that expresses "loyalty" to the "defendant". I have the right to "effective assistance of counsel". Cuyler v. Sullivan 100 S. Ct. 1708 (1980); and Frazier v. U.S. 18 F. 3d 778 (9th Cir. 1994). Thus, the adversarial process protected by the 6th amendment requires that the accused have "counsel" in the role of an advocate. Anders v. California, 87 S. Ct. 1396 and 1480 (1967). A party whose "counsel" is unable to provide effective or adequate assistance is no better than one who has no counsel at all; and any appeal(s) would be futile in its gesture. Evitts v. Lucey 105 S. Ct. 830 (1985); Douglas v. California, 83 S. Ct. 814 (1963). Appointed "counsel" for this defendant has done nothing to fairly/properly represent him since that "deal" day (of which defendant had no say in rushed--decision and was threatened with "Death penalty"/"life in prison" if defendant did not cooperate), this alone is a viable claim as to ineffective counsel.

(8) Crandel V. Bunnell NO. 92-5530 D.C. NO. CV-90-6419-WJR
(s); filed May 25, 1994 (9th Cir.) Therefore, defendant
contends that although counsel has been appointed
in this case, the actions of counsel, or lack thereof,
have created unfair prejudice and obstacles which
do not comport the fair procedures owed to the
defendant.

(9) I have attached "documents" in order
to substantiate and show the "courts"
"proof" of the "unfair prejudice" created
in this "case" as well as "Due Process
violation(s)" committed by "Appointed counsel"
along with the "help" of the "courts."

DATED THIS 25 day of Nov., 2012.

I, Jason Jones, do

solemnly swear, under the penalty of perjury, that

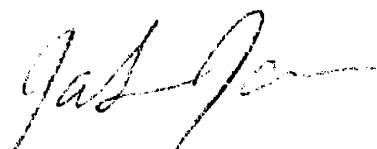
the above aforementioned is accurate,

correct, and true to the best of my knowledge.

NRS 171.102 and NRS 208.165.

Respectfully submitted,

Defendant




CLERK OF THE COURT

TRAN

DISTRICT COURT
CLARK COUNTY, NEVADA

STATE OF NEVADA,

Plaintiff,

vs.

JASON JONES,

Defendant.

CASE NO. C285488-1
DEPT. XXI

BEFORE THE HONORABLE VALERIE ADAIR, DISTRICT COURT JUDGE

THURSDAY, JANUARY 10, 2013

RECORDER'S TRANSCRIPT OF HEARING RE:
DEFENDANT'S MOTIONS
CHANGE OF PLEA

APPEARANCES:

FOR THE STATE:

NELL E. CHRISTENSEN, ESQ.
Chief Deputy District Attorney

FOR THE DEFENDANT:

RANDALL H. PIKE, ESQ.
Assistant Special Public Defender
CHARLES A. CANO, ESQ.
Deputy Special Public Defender

RECORDED BY: JANIE L. OLSEN, COURT RECORDER/TRANSCRIBER

1 LAS VEGAS, CLARK COUNTY, NV., THURS., JAN. 10, 2013

2
3 THE COURT: State versus Jason Jones. Mr. Jones is present in custody.

4 THE DEFENDANT: Excuse me, Your Honor. May I speak before we get
5 started?

6 THE COURT: I'm sorry?

7 THE DEFENDANT: May I say something before we get started?

8 THE COURT: Well, why don't we get started.

9 THE DEFENDANT: I would like to put in a motion to dismiss counsel.

10 THE COURT: Okay. You want to file that in open court?

11 THE DEFENDANT: Yes, ma'am.

12 THE COURT: All right. Counsel, we've got Mr. Pike and Mr. Cano.

13 Do you have any copies or just the one?

14 THE DEFENDANT: No, I gave them a copy already and then that's the copy
15 for the Court.

16 THE COURT: And has the State received a copy?

17 MS. CHRISTENSEN: No, Your Honor.

18 THE COURT: No.

19 MR. PIKE: I'll provide the State a copy.

20 THE COURT: Okay. And so, Counsel, you had received this prior to today?

21 MR. PIKE: That's correct, Your Honor.

22 THE COURT: All right. And I'm just going to look at this really quickly.

23 Okay. Basically, you know, you say they haven't returned your phone
24 calls.

25 Counsel, have you been in communication with the defendant?

1 MR. CANO: Yes, Your Honor.

2 THE COURT: Okay. They're not PDs; they're correct. They are State
3 employees. I'm looking at ground No. 4 on this. That doesn't mean they're working
4 with the State, meaning the State of Nevada the prosecutors' office. Basically there
5 are the County public defenders and then there's the State public defenders. And
6 they're appointed when there's a conflict. So that's -- I think if there's some
7 confusion, that's what the confusion is.

8 THE DEFENDANT: There's no confusion whatsoever, Your Honor.

9 THE COURT: There was a conflict; is that why the -- Mr. Kohn's office wasn't
10 appointed?

11 MR. PIKE: That's correct. They had represented the victim.

12 THE COURT: All right. They represented the victim --

13 MR. PIKE: And a number of witnesses.

14 THE COURT: -- and basically almost everything that their office does is
15 murder defense. Occasionally there might be something else, but -- or maybe
16 nowadays it's all murder defense. And they're appointed when the County public
17 defender, Mr. Kohn's office, cannot represent you, and they just said they've
18 represented the victim in this case. So there's a conflict so then it goes to them. So
19 that's all above board and not grounds.

20 THE DEFENDANT: Your Honor, I have a couple of documents and things,
21 you know, conflicts of interest between defense counsel and clients, and, you know,
22 I have -- the motion that they're trying to put in today I have a document right here
23 that says that under that event number it was created, which is the phone call, the 9-
24 1-1 call of James Sheffield, which is a witness in my case. That phone call was
25 created --

1 THE COURT: Okay. Here's the deal. Wait. Here's the deal. I've read your
2 motion, okay. The one thing that you seem to have been confused about I've
3 addressed right now that that's -- there's nothing wrong with them --

4 THE DEFENDANT: I'm not confused about anything, Your Honor.

5 THE COURT: Sir. Sir. It's not a free for all. It's not an open forum where
6 you get to just raise whatever you want. You're currently represented by counsel --

7 THE DEFENDANT: And I don't feel --

8 THE COURT: Sir, I'm speaking. I understand, you know, you're not happy
9 with your counsel. You don't get to pick and choose who you get. The only people
10 who get to pick and choose are the people who are lucky and fortunate enough,
11 which aren't many defendants let me just tell you, who can afford to go out and pay
12 50 or a hundred thousand or whatever it may cost to be defended through trial in a
13 criminal case.

14 THE DEFENDANT: Your Honor, this is my life on the line. If I have --

15 THE COURT: Sir. Sir.

16 THE DEFENDANT: -- to go --

17 THE MARSHAL: Keep your mouth shut when the Judge is talking.

18 THE COURT: Now, if your family can hire counsel for you, that's certainly a
19 right that you and any other defendant has. If you cannot afford counsel, and you
20 qualified for the appointment of counsel, you don't get to pick and choose. This
21 Court will only remove counsel and appoint someone else if there's an actual conflict
22 or if for some reason counsel falls below standards because, you know, something
23 going on in their office or a health reason, or there's some real true conflict between
24 them being able to represent you.

25 I've read your motion here at the bench. There is nothing like that in

1 this particular case. I am not going to remove Mr. Cano and Mr. Pike from
2 representing you. So you either take them or you can represent yourself. Those
3 are your two options if you pass a Faretta canvass.

4 Basically, again, these are excellent attorneys. All they do is murder
5 defense. That's all they do. They're experts in this. So, you know, the fact that you
6 don't like everything or you don't feel that they're attentive enough to your needs is
7 not grounds --

8 THE DEFENDANT: That's not it --

9 THE COURT: -- sir, is not grounds for me to remove them as your counsel
10 and appoint somebody else.

11 So I've reviewed your motion. I don't know if there's anything you want
12 to address regarding any of, you know, the allegations in the motion in court.

13 MR. PIKE: No, Your Honor, we've met with the client. We've conducted a full
14 investigation. He just -- in fact, as the Court directed me to last time, he indicated he
15 wanted an order to get married. I prepared an ex parte application that had the
16 word ex parte in it so he didn't like it. Wouldn't approve it. So I didn't have him sign
17 that or submit that.

18 He directed that we not file any motions. I felt a writ of habeas corpus
19 was appropriate to dismiss the case based upon a lack of probable cause. He is
20 opposed to that as well as the motions -- the other two motions that I filed. One is a
21 discovery motion in order to make sure that we had everything to complete the
22 record. The other one was for admission of some hearsay statements. The State
23 has opposed that. I'll submit the motions, but I felt I had an ethical obligation to file
24 those motions despite the fact that he did not want any motions at all filed in his
25 case.

1 THE COURT: All right. Mr. Jones, I'm somewhat reluctant -- I ask you this
2 question against my better judgment. Why don't you want your attorneys filing
3 motions? You just don't want them to file any motions on your behalf, correct?

4 THE DEFENDANT: Correct. You know, after seeing this motion that they're
5 trying to file today on my behalf, you know, it's clearly against my benefit in my case.
6 This is my life, Your Honor. I would rather, you know, have no counsel at all than to
7 have them based upon the fact that this is my life. I would have to go up not them.

8 THE COURT: Okay. First of all, even if the motion isn't granted, that doesn't
9 mean it's against your interests. In order to preserve all the issues for appeal, they
10 have to raise them here regardless of what the outcome is. They hope that they can
11 raise enough issues that this Court, if you are convicted, makes enough mistakes
12 that you'll have an opportunity to have another trial.

13 Obviously, they hope to either prevail legally to where your case is
14 dismissed or charges are reduced or something like that, or they hope to prevail in
15 front of a jury. If that doesn't happen, then it's their job to make sure they've raised
16 every potential issue so that in an appeal they can say, well, this issue should have
17 been granted or the Judge made a mistake on that issue, didn't give the correct
18 instruction, didn't do this or that. That's their job. That's what lawyers do.

19 THE DEFENDANT: If they would have done that at preliminary hearing when
20 I was --

21 THE COURT: Sir, no. I know you think you know more than Mr. Pike or Mr.
22 Cano or this Court or maybe Ms. Christensen too, but let me --

23 THE DEFENDANT: Of course they're the lawmakers and they --

24 THE COURT: -- just tell you you don't.

25 So you filed the petition. This actually had been calendared for change

1 of plea. Obviously negotiations have fallen apart.

2 MR. PIKE: That's correct, Your Honor.

3 THE COURT: All right.

4 MR. PIKE: We obtained a written plea agreement. I provided a copy of that
5 plea agreement to the defendant. He reviewed that and then decided not to enter
6 into that negotiation.

7 THE COURT: All right. Let's start with the motion for discovery.

8 MR. PIKE: Your Honor --

9 THE COURT: Verification of all physical evidence. I'm assuming what you
10 want there is for Ms. Christensen, the State, to verify that they've given you all
11 reports and any physical evidence that's been collected in this case or to at least
12 make you aware of that. Is that what you're asking for?

13 MR. PIKE: That's correct, Your Honor. And if there's any pending forensics
14 that are being done because that -- we've had some difficulty with the forensic lab
15 with our subpoenas and the manner in which that's been done. So we just did that
16 specifically to request if there are any pending forensic reports or examinations that
17 are being done, then we request that. We conducted a file review and have
18 everything that the State has.

19 THE COURT: All right. Ms. Christensen, you understand it's your obligation
20 to make yourself aware with anything that's been collected in connection with this
21 case, disclose that to Mr. Pike and Mr. Cano, and then if they want to do a complete
22 file review to make that available.

23 MS. CHRISTENSEN: Yes, Your Honor.

24 THE COURT: Moving on. The photographs, and you say that you've given
25 them everything?

1 MS. CHRISTENSEN: I've provided the coroner's photographs, the crime
2 scene photographs. They've asked additionally for photographs of people that
3 aren't witnesses in the case but that were kind of tangentially involved. They've
4 indicated that they have photographs of those people. There were no photographs
5 of those people taken in the investigation.

6 THE COURT: And none were seized as part of a search warrant or anything
7 like that?

8 MS. CHRISTENSEN: No. There were -- anything that was taken by Metro
9 I've provided. If they, you know, that's all that I think I'm entitled to provide. There
10 may be photos of those guys out there somewhere but --

11 THE COURT: Yeah. I mean, here's what I would say to that, Mr. Pike. I
12 mean, if your investigator -- if their investigator has taken photos of these people or
13 someone, then they have to give them. If you just think there's photos out there,
14 maybe booking photos or something like that, then it's your obligation to subpoena
15 those from the detention center or wherever you think they might be. I'm not going
16 to direct the State that they have to go out there and locate these photos.

17 If that's the kind of photos you think there may be, then it's your
18 obligation to subpoena those.

19 MR. PIKE: Thank you.

20 THE COURT: All right. And I think that was it for the discovery?

21 MR. PIKE: Correct.

22 THE COURT: All right. Let's move on to your To admit evidence and
23 contents of the 9-1-1 --

24 MR. PIKE: That's correct. It is hearsay. We think it's part of the theory of the
25 defense to bring that in. There's indicators that it may be under the circumstances

1 with which it was given, it may be reliable. Although, given the medical condition of
2 the declarant the State is taking an opposition to that.

3 THE COURT: Right. They're taking the position that he had Alzheimer's and
4 so --

5 MR. PIKE: So we'll just submit that.

6 THE COURT: -- it's not reliable. It's not an excited utterance 'cause it's what,
7 10 days later.

8 MR. CANO: Although the Court has ruled that excited utterances can --

9 THE COURT: Yeah, I know. In fact, that was upheld in a case that we had,
10 the Medina matter.

11 MR. CANO: And he was calling 9-1-1 when he made those --

12 THE COURT: No, I understand it's a 9-1-1.

13 Ms. Christensen?

14 MS. CHRISTENSEN: Your Honor, I've laid out the opposition. I think it's
15 extremely clear that the way that they're trying to get this in it just doesn't work.
16 They want to get it in, and they want to get one of this man's many stories in. That's
17 just not how it works. I understand they have to make a record that they tried to do
18 it. It should be denied flat out.

19 The fact that he called 9-1-1, I provided you with a copy of the audio.
20 You can tell on the audio. This was just a calm conversation. He's chitchatting with
21 the -- with the dispatcher about all kinds of things in addition to what he wanted to
22 call about. If you want -- I believe you probably read everything. I'm not going to go
23 over it. If you have any specific question about it, I'd be happy to answer it. But I
24 don't think this is a close call.

25 MR. PIKE: And to make sure that the record, if it goes up on appeal, is

1 complete, we filed a transcript of the statement.

2 THE COURT: Right. Okay. We can make the audiotape a court's exhibit as
3 well if it's not admitted. That way if -- assuming it ever gets there, we'd also have
4 that to the extent that anyone's interested in listening to it. So I'm going to listen to
5 that again and consider that further and give you a decision on Monday.

6 Let's move to the habeas petition. Anything to add?

7 MR. PIKE: Nothing to add, Your Honor. If you have any questions, I'll be
8 happy to answer them.

9 THE COURT: All right. State, anything that you'd like to add to what's
10 already been provided to the Court?

11 MS. CHRISTENSEN: I'll submit it.

12 THE COURT: All right. I think that there's sufficient evidence in the record to
13 support the bind over. So that matter is denied.

14 And then as I said, the only remaining matter is the admissibility of the
15 9-1-1 tape. If it's not -- if it's admitted, obviously it will be a trial exhibit. If it's not
16 admitted, we would ask the State to make a audio copy as a court's exhibit for any
17 appellate purposes.

18 MR. CANO: Your Honor, I know we have a calendar --

19 THE COURT: I'm sorry?

20 MR. CANO: I know we're set for calendar call next week.

21 THE COURT: Yes.

22 MR. CANO: I just wanted to bring to your attention that I actually am going to
23 be in trial starting Monday.

24 THE COURT: This coming Monday?

25 MR. CANO: Yes, starting the 14th.

1 THE COURT: All right. Well, we'll see how that's going on Thursday. Are
2 you suggesting if you go forward on Monday you wouldn't be available in this case?
3 Or are you suggesting if you go forward with the other trial on Monday we might
4 have to start a little bit later on this case?

5 MR. CANO: Well, I'm in trial, and Ms. Christensen is the DA on that case that
6 starts on Monday as well.

7 THE COURT: So you'd both be late?

8 MR. CANO: I don't think either one of us would be available.

9 MS. CHRISTENSEN: Your Honor, we both would like to get a different date
10 now if possible because we won't be able to prepare for this case when we're in that
11 trial. Judge Smith has cut out two weeks for us for that trial. So it would go over
12 into the dates that we have for this case.

13 THE COURT: Is there any hope of that case resolving?

14 MS. CHRISTENSEN: The same offer has been outstanding for approximately
15 two years on that case, Your Honor.

16 THE COURT: Here's what I'm going to do just in case it resolves. As you
17 know, sometimes that happens on Monday morning. I don't want to vacate this trial
18 and then have your other case resolve and now he's moved all the way to August
19 sitting in jail all this time. So let's keep the date for right now understanding that you
20 may not be available, and then if your case resolves in front of Judge Smith for
21 some reason -- and obviously we'll know just through the back hallway channels if
22 Judge Smith is in trial or not -- if he is in trial with you folks, then we'll plan on having
23 to move this. If he's not, then I expect you folks to get gearing up and be prepared
24 to try the matter in here. So that's the way it will be.

25 MR. CANO: I just wanted to get -- make the Court aware of it is all.

1 THE COURT: All right. Thank you. I appreciate that.

2 MR. PIKE: Thank you, Your Honor.

3 -oOo-

4 ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video
5 proceedings in the above-entitled case.

6 
7 JANIE L. OLSEN
8 Recorder/Transcriber
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CLERK OF THE COURT

1 **NOTC**

2 STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

3 NELL E. CHRISTENSEN
Chief Deputy District Attorney
4 Nevada Bar #008822
200 Lewis Avenue
5 Las Vegas, Nevada 89155-2212
(702) 671-2500
6 Attorney for Plaintiff

7 **DISTRICT COURT**
8 **CLARK COUNTY, NEVADA**

9 THE STATE OF NEVADA,

10 Plaintiff,

11 -vs-

12 JASON JONES,
13 #2735018

14 Defendant.

CASE NO: C-12-285488-1

DEPT NO: XX1

15 **SUPPLEMENTAL NOTICE OF WITNESSES AND/OR EXPERT WITNESSES**
16 **[NRS 174.234]**

17 TO: JASON JONES, Defendant; and

18 TO: RANDY PIKE and CHARLES CANO, Special Public Defenders,

19 Counsel of Record:

20 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF
NEVADA intends to call the following witnesses in its case in chief:

21 These witnesses are in addition to those witnesses endorsed on the Information and
22 any other witness for which a separate Notice has been filed.

23 YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF
24 NEVADA intends to call expert witnesses in its case in chief as follows:

25 The substance of each expert witness testimony and copy of all reports made by or at
26 the direction of the expert witness has been provided in discovery.

27 A copy of each expert witness curriculum vitae, if available, is attached hereto.

28 //

	<u>NAME</u>	<u>ADDRESS</u>
1	ACEVEDO, N. – VALLEY MORTUARY	
2	ADAM, ZACHARY – LVMPD P#9028	
3	ADAME, GABRIEL – 3450 NORTH HUALAPAI WAY, #1014, LVN 89129	
4	AGATONE, FRANK – LVMPD P#13325	
5	AHLIN, JASON – LVMPD P#13432	
6	BANKS – LVFD RESCUE UNIT 301	
7	BARELA, RICHARD – LVMPD P#4505	
8	BARRINGER, DAMON – LVMPD P#7178	
9	BECHLER, MICHAEL – LVMPD P#4701	
10	BECK, KEVIN – LVMPD P#9629	
11	BECK, ZACHARY – LVMPD P#9028	
12	BICHSEL, JAMES – FORENSIC TECH – CORONER'S OFFICE	
13	BILYEU, RICHARD – LVMPD P#7524	
14	BOUCHER, DOLPHIS – LVMPD P#4636	
15	BREWER, WILLIAM – LVMPD P#6732	
16	BROTHERSON, DEBORAH – LVMPD P#4931 (or designee): CRIME SCENE	
17	ANALYST: Expert in the identification, documentation, collection and preservation of	
18	evidence and is expected to testify as an expert to the identification, documentation,	
19	collection and preservation of the evidence in this case.	
20	BROWN, JIMMIE – 1416 F ST., #8, LVN 89106	
21	BROWNLEE, TRACY – LVMPD P#9975 (or designee): CRIME SCENE ANALYST:	
22	Expert in the identification, documentation, collection and preservation of evidence and is	
23	expected to testify as an expert to the identification, documentation, collection and	
24	preservation of the evidence in this case.	
25	BURNS, LARRY – LVMPD P#3170	
26	BUTLER, JOVONNE, 1416 F STREET, #16, LVN 89106	
27	CAREY, KEVIN – LVMPD P#8739	
28		

1 COLEMAN, LORETTA – 1416 F ST., #7, LVN 89106
2 COLEMAN, WILLIAM – 1416 F ST., #16, LVN 89106
3 COPLEY, BRANDON – LVMPD P#14462
4 CORONA, MICHAEL – 3650 E. LAKE MEAD, #123, LVN 89115
5 CUSTODIAN OF RECORDS - CRICKET COMMUNICATIONS, 21575 RIDGETOP
6 CIRCLE, STERLING, VA
7 CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER
8 CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS
9 CUSTODIAN OF RECORDS – LVMPD RECORDS
10 CUSTODIAN OF RECORDS – SPRINT
11 DOUGHERTY, ED – DISTRICT ATTORNEY INVESTIGATOR
12 DUNN, MICHAEL – LVMPD P#13003
13 DUTRA, DR. TIMOTHY - A medical doctor, employed by the Clark County Coroner's
14 Office as a Deputy Medical Examiner/Forensic Pathologist. He is an expert in the area of
15 forensic pathology and will give scientific opinions related thereto. He is expected to testify
16 regarding the cause and manner of death of Jaime Corona.
17 DUTRA, DR. TIMOTHY – CLARK COUNTY CORONER'S OFFICE
18 FARMER, FRANK – LVMPD P#6528
19 GILLIS, MATTHEW – LVMPD P#6432
20 GLASS, RYAN – LVMPD P#13461
21 GOUGH, P. – VALLEY MORTUARY
22 GRAY, BRANDON – AMR UNIT 3933
23 GREALIS, NOREEN – LVMPD P#13572 (or designee): CRIME SCENE ANALYST:
24 Expert in the identification, documentation, collection and preservation of evidence and is
25 expected to testify as an expert to the identification, documentation, collection and
26 preservation of the evidence in this case.
27 HALL, RICHARD – LVMPD P#6756
28 HARRIS, CAPT. – LVFD ENG UNIT 201

1 HART, RICHARD – LVMPD P#7527
2 HERRERA, VINCENT – 1416 F ST., #1, LVN 89106
3 HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR
4 IVIE, TRAVIS – LVMPD P#6405
5 JACKSON, BRIAN – LVMPD P#9690
6 JORDAN, K. – LVMPD P#3715
7 JUNGE, STEVEN – LVMPD P#4043
8 KOWALSKI, BRIAN – LVMPD P#8550
9 KRYLO, JAMES – LVMPD P#5945 (or designee): FIREARMS/TOOLMARK
10 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
11 field of firearm and toolmark comparisons and is expected to testify thereto.
12 LAFRENIERE, JASON – LVMPD P#7570
13 LAUTZENHEISER, SCOTT – CLARK COUNTY CORONER’S OFFICE
14 LEHMANN, STEPHEN – LVMPD P#13885
15 LONG, ALLEN – LVMPD P#9189
16 MALDONADO, TOBY – LVMPD P#3408
17 MCEWEN, JOSHUA – LVMPD P#10110
18 MCGHEE, EBONY – LVMPD P#5158 (or designee): CRIME SCENE ANALYST: Expert
19 in the identification, documentation, collection and preservation of evidence and is expected
20 to testify as an expert to the identification, documentation, collection and preservation of the
21 evidence in this case.
22 MCMEANS, TYLER – LVMPD P#13407
23 MEDINA, ROBERTO – LVMPD P#7422
24 MELVIN, JOSHUA – LVMPD P#13392
25 MIELE, SUZANNE – FORENSIC TECH – CORONER’S OFFICE
26 MILLER, MICHAEL – LVMPD P#14297
27 MURRAY, SCOTT – LVMPD P#4147
28 MYERS, RONALD – AMR UNIT 3933

1 OLIVAS, KAZANDRA – 1416 F ST., #1, LVN 89106
2 PARAYNO, EDUARDO – LVMPD P#14464
3 PARRA, JOSEPH – LVMPD P#10025
4 PEPPER, J. – LVMPD P#13479
5 RAMIREZ, FRANCISCA – 3650 E. LAKE MEAD BLVD., #123, LVN 89115
6 REVELS, JEROME – DISTRICT ATTORNEY INVESTIGATOR
7 ROGERS – LVMPD P#2858
8 SANBORN, TATE – LVMPD P#5450
9 SANTOS, JONATHAN – LVMPD P#14098
10 SAUL, ROBERT – 1769 ROYAL ESTATES, LVN 89115
11 SCOTT, JON – LVMPD P#4532
12 SHELLBERG, PETER – LVMPD P#5413 (or designee): CRIME SCENE ANALYST:
13 Expert in the identification, documentation, collection and preservation of evidence and is
14 expected to testify as an expert to the identification, documentation, collection and
15 preservation of the evidence in this case.
16 SHOEMAKER, JASON – LVMPD P#8455
17 SINK, JAMES – LVMPD P#8757
18 SMITH, JEFFREY – LVMPD P#8177 (or designee): CRIME SCENE ANALYST: Expert
19 in the identification, documentation, collection and preservation of evidence and is expected
20 to testify as an expert to the identification, documentation, collection and preservation of the
21 evidence in this case.
22 TAFOYA, STEVE – LVMPD P#4435 (or designee): COMPUTER EXPERT: Expert in the
23 area of electronic media, electronic communication and computer technology and to the
24 collection and preservation of evidence and is expected to testify as an expert to the
25 identification, documentation, retrieval, collection and preservation of the evidence in this
26 case.
27 THOMAS, KRISTINA – LVMPD P#13574
28 //

1 VACHON, CRYSTINA - Bexar County Forensic Science Center, Criminal Investigation
2 Laboratory, 7337 Louis Pasteur, San Antonio, Texas 78229-4565: Forensic Scientist-
3 Conducts forensic testing and analyses in the area of Trace Evidence. Interprets test results
4 and prepares forensic reports for law enforcement personnel on criminal investigations.

5 VALLAD, JASON - LVMPD P#12961

6 VORCE, RICHARD - LVMPD P#4055

7 WALTER, BRIAN - LVMPD P#8080

8 WARREN, BRICIE - LVMPD P#12893

9 WILLIAMS, DENISE - ADDRESS UNKNOWN

10 WRIGHT, AMANDA - LVMPD P#9974 (or designee): CRIME SCENE ANALYST:
11 Expert in the identification, documentation, collection and preservation of evidence and is
12 expected to testify as an expert to the identification, documentation, collection and
13 preservation of the evidence in this case.

14 STEVEN B. WOLFSON
15 District Attorney
Nevada Bar #001565

16 BY /s//NELL E. CHRISTENSEN
17 NELL E. CHRISTENSEN
18 Chief Deputy District Attorney
Nevada Bar #008822

19
20 **CERTIFICATE OF ELECTRONIC FILING**

21 I hereby certify that service of State's Notice was made this 11th day of January,
22 2012, by Electronic Filing to:

23 RANDY PIKE, Special Public Defender
24 CHARLES CANO, Special Public Defender
E-mail Address: RPike@ClarkCountyNV.gov
25 canoca@ClarkCountyNV.gov
KFitzger@ClarkCountyNV.gov

26 Shellie Warner
27 Secretary for the District Attorney's Office

28 mmw/GCU

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: Deborah Brotherson

P# 4931

Date: 10-1-03

CURRENT CLASSIFICATION		
	<i>Classification</i>	<i>Minimum Qualifications</i>
	Crime Scene Analyst I	AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation.
	Crime Scene Analyst II	18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I.
X	Senior Crime Scene Analyst	Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst.
	Crime Scene Analyst Supervisor	Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field.
FORMAL EDUCATION		
<i>Institution</i>	<i>Major</i>	<i>Degree/Date</i>
CCSN-Las Vegas	Criminal Justice	Degree-1994
TESTIMONY		
Yes	No	
EMPLOYMENT HISTORY		
<i>Employer</i>	<i>Title</i>	<i>Date</i>
LVMPD	Sr. Crime Scene Analyst	3-20-95

0189

BROTHERSON, DEBORAH
 SENIOR CSA

P# 4931
 SS#: 492-60-4422

CRIMINALISTICS BUREAU - FIELD
 DOH: 03-20-95

DATE	CLASS TITLE	AGENCY	CREDIT HOURS
05-94	Associate of Applied Science, Criminal Justice	Community College of Southern Nevada	Associate Degree
05-94	Associate of General Studies	Community College of Southern Nevada	Associate Degree
04-07-95	Introductory Crime Scene Analyst Training	LVMPD	40
04-17-95 03-03-98	Range Training	LVMPD	4
04-27-95	FATS Training	LVMPD	1
05-18-95	Driver Training - Level 2	LVMPD	8
06-30-95	Duty Weapon Qualification	LVMPD	1
08-02-95	New Civilian Employee Orientation	LVMPD	7
09-30-95	Duty Weapon Qualification	LVMPD	1
12-31-95	Duty Weapon Qualification	LVMPD	1
01-25-96	Automated Investigation Measurement - Regional Manager	Nikon, Inc.	24
03-26-96	Forensic Science	American Institute of Applied Science (AIAS)	260
03-31-96	Duty Weapon Qualification	LVMPD	1
04-29-96	Combat Shooting Simulator/FATS	LVMPD	1
06-16-96	CAPSTUN for Civilians	LVMPD	1
06-30-96	Duty Weapon Qualification	LVMPD	2
07-22-96	Gunshot and Stab Wounds - A Medical Examiner's View	Barbara Clark Mims Associates	8
06-22-96	CAPSTUN Training	LVMPD	1.5
09-23 to 09-27-96	Crime Scene Technology II	Northwestern University, Traffic Institute	40
09-30-96	Duty Weapon Qualification	LVMPD	2
10-07 to 10-11-96	Fingerprint Classification	Law Enforcement Officers Training School	40
11-15-96	Ultraviolet (UV) Light Orientation and Safety Presentation	LVMPD	1
02-27-97	Moot Court - Video	LVMPD	2
03-21-97	Gangs in Clark County	LVMPD	7
03-26-97	Civilian Use of Force/Firearms	LVMPD	21
03-30-97	Duty Weapon Qualification	LVMPD	2
04-01 to	Top Gun Training	LVMPD	21

0190

DATE	CLASS TITLE	AGENCY	CREDIT HOURS
04-03-97			
06-13-97	NCIC Phase I - Video	LVMPD	20 Min.
06-27-97	Critical Procedures Test	LVMPD	
07-02-97	Duty Weapon Qualification	LVMPD	2
09-15 to 09-19-97	Bloodstain Evidence Workshop I	Northwestern University, Traffic Institute	40
09-30-97	Duty Weapon Qualification	LVMPD	2
11-03 to 11-07-97	Courtroom Presentation of Evidence: Effective Expert Witness Testimony Workshop	CAT/NWAFS/SWAFS/SAT Joint Meeting	7
11-03 to 11-07-97	Crime Scene Investigation Workshop	CAT/NWAFS/SWAFS/SAT Joint Meeting	7
12-31-97	Duty Weapon Qualification	LVMPD	2
01-07-98	Combat Shooting Simulator/FATS	LVMPD	1
01-30-98	Domestic Violence - Video	LVMPD	1
02-25-98	Clandestine Lab Dangers - Video	LVMPD	30 Min.
02-26-98	Trauma Shooting - Video	LVMPD	30 Min.
03-07-98	Secondary Devices - Video	LVMPD	30 Min.
03-31-98	Duty Weapon Qualification	LVMPD	2
04-16-98	Duty Weapon Qualification	LVMPD	2
07-16-98	Driver Training - Class II	LVMPD	8
09-18-98	Optional Weapon	LVMPD	
09-21 to 09-25-99	Investigative Photography I	Northwestern University, Traffic Institute	40
10-08-98	Critical Procedures Test	LVMPD	2
11-04-98	Duty Weapon Qualification	LVMPD	2
12-07 to 12-11-98	Advanced Practical Homicide Investigation - Public Agency Training Council, Nat'l. Criminal Justice, Public Safety Continuing Education	P.H.I. Investigative Consultants, Inc.	40
01-15-99	Training - Motor Home Driving	LVMPD	4
02-23 to 02-25-99	Latent Print Identification	Law Enforcement Officers Training School	24
03-19-99	Award Presentation and PR Photography	LVMPD	2
03-30-99	Duty Weapon Qualification	LVMPD	2
04-28 to 04-30-99	First Annual Educational Conference Opening Ceremonies (2)	NSDIAI	
04-28 to	First Annual Educational Conference	NSDIAI	2

0191

DATE	CLASS TITLE	AGENCY	CREDIT HOURS
04-30-99	JKF-MLK Evidence		
"	Latent Prints on Skin	NSDIAI	2
"	Disaster Preparedness	NSDIAI	2
"	Unabomber	NSDIAI	2
"	Laboratory Photography	NSDIAI	2
"	Polly Klass	NSDIAI	2
06-13 to 06-17-99	1999 Death Investigation Seminar	Internat'l. Assoc of Coro- ners and Medical Examiners	32
06-22-99	Duty Weapon Qualification	LVMPD	2
06-30-99	Optional Weapon	LVMPD	15
08-23 to 08-27-99	Bloodstain Evidence Workshop 2	Northwestern University, Traffic Institute	40
09-21-99	Duty Weapon Qualification	LVMPD	2
09-20 to 09-24-99	Investigative Photography 2	Northwestern University, Traffic Institute	40
01-20-00	Latent Fingerprint Development Workshop	U.S. Secret Service	8
04-17 to 04-21-00	Advanced Crime Scene Investigation	IAI	40
05-03 to 05-05-00	Second Annual Educational Conference Shoebox Labeling (Also see below items)	NSDIAI	1
"	Gadgets and Gizmos	NSDIAI	2
"	Handwriting	NSDIAI	2
"	Child Abuse	NSDIAI	2
"	Child Abuse II	NSDIAI	2
"	WIN-AFIS	NSDIAI	2
"	Galaxy Air Crash	NSDIAI	2
"	Photo FP Tech	NSDIAI	2
"	Arson Investigations	NSDIAI	2
06-12 to 06-14-00	Clandestine Laboratory Safety Certification Course - Occasional Site Worker	LVMPD	24
06-13-00	Crime Scene Analyst Certification	IAI	3 Hour Test
09-06 to 09-08-00	Shooting Incident Reconstruction	LVMPD	24
01-22 to 01-26-01	Advanced Ridgeology Comparison Techniques	Forensic Identification Training Seminars, LLC	40
04-11 to	NSDIAI - 3 rd Annual Educational Conference		

0192

DATE	CLASS TITLE	AGENCY	CREDIT HOURS
04-13-01	Florazine	NSDIAI	2
“	Footwear Recovery	NSDIAI	2
“	Bloodstain Report Writing	NADIAI	2
“	Ted Binion Homicide	NSDIAI	2
06-25 to 06-29-01	Investigating Child Abuse & Exploitation Seminar	U.S. Department of Justice F.B.I.	40
11-29-01	Bloodstain Pattern Analysis - Angle of Impact Proficiency Exercise - Certificate # 30	LVMPD Criminalistics Bureau	3
03-30-02	Documentation of Footwear & Tire Impressions	LVMPD	1
04-01-02	Clandestine Laboratory Safety - Fingerprint Processing	LVMPD	1
04-02-02	Forensic Anthropology	LVMPD	1.5
04-04-02	Criminal Law	LVMPD	2
05-08-02	Major Case Prints	LVMPD Criminalistics Bureau	3
08-04 to 08-10-02	87 th International Educational Conference - See below	IAI	
“	W-48: A Courtroom Appropriate Demonstrative Aid for Bloodstain	“	7
02-06 to 02-08-03	Advanced Shooting Incident Reconstruction - Forensic Identification Training Seminars	LVMPD	24
06-17 to 06-19-03	Dept. of Justice, Weapons of Mass Destruction, Radiological/ Nuclear Responder Operations Course - Conducted by Bechtel Nevada Counter Terrorism Operations Support	UNLV	3.2
07-06 to 07-11-03	88 th International Educational Conference - See below	IAI	See Below
07-11-03	W80: Demystifying Palm Prints	IAI	4

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: **BROWNLIE, Tracy**

P# 9975

Date: 09-16-10

CURRENT CLASSIFICATION		
	<i>Classification</i>	<i>Minimum Qualifications</i>
X	Crime Scene Analyst I	AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation.
X	Crime Scene Analyst II	18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I.
	Senior Crime Scene Analyst	Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst.
	Crime Scene Analyst Supervisor	Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field.

FORMAL EDUCATION		
<i>Institution</i>	<i>Major</i>	<i>Degree/Date</i>
Lower Columbia College	General Transfer	AA 06/03
Eastern Washington Univ.	Criminal Justice	BA 08/05

TESTIMONY		
<i>Yes</i>	<i>No</i>	

EMPLOYMENT HISTORY		
<i>Employer</i>	<i>Title</i>	<i>Date</i>
LVMPD	CSA II	05-14-09 to Present
LVMPD	CSA I	05-17-07 to 05-17-09

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: Noreen Grealis

P# 13572

Date: 09-02-10

CURRENT CLASSIFICATION		
	<i>Classification</i>	<i>Minimum Qualifications</i>
X	Crime Scene Analyst I	AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation.
X	Crime Scene Analyst II	18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I.
	Senior Crime Scene Analyst	Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst.
	Crime Scene Analyst Supervisor	Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field.
FORMAL EDUCATION		
<i>Institution</i>	<i>Major</i>	<i>Degree/Date</i>
John Carroll University	Biology	B.S.-May 2007
TESTIMONY		
<i>Yes</i>	<i>No</i>	
EMPLOYMENT HISTORY		
<i>Employer</i>	<i>Title</i>	<i>Date</i>
LVMPD	Crime Scene Analyst I	09/02/2008 - 09/02/10
LVMPD	Crime Scene Analyst II	09/02/2010 to Present

Curriculum Vitae
Las Vegas Criminalistics Bureau
Statement of Qualifications

Name: Ebony McGhee

P# 5158

Date: 10-1-03

CURRENT CLASSIFICATION		
	<i>Classification</i>	<i>Minimum Qualifications</i>
X	Crime Scene Analyst I	AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation.
	Crime Scene Analyst II	18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I.
	Senior Crime Scene Analyst	Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst.
	Crime Scene Analyst Supervisor	Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field.

FORMAL EDUCATION		
<i>Institution</i>	<i>Major</i>	<i>Degree/Date</i>
CCSN	Criminal Justice	Associates Degree-1998

TESTIMONY		
<i>Yes</i>	<i>No</i>	

EMPLOYMENT HISTORY		
<i>Employer</i>	<i>Title</i>	<i>Date</i>
LVMPD	Crime Scene Analyst I	5-29-96

*McGHEE, EBONY
SA I

P# 5158
SS#: 306-86-7688

CRIMINALISTICS BUREAU - FIELD
DOH: 05-29-96

DATE	CLASS TITLE	AGENCY	CREDIT HOURS
01-90 to 06-92	Computer Information Systems	S.N.V.T.C. (Vo-Tech)	5 Semesters
10-07-96	New Civilian Employee Orientation	LVMPD	8
04-03-97	Auto Theft	LVMPD	2
05-27-97	NCIC Certification - Limited Access	LVMPD	7
01-01-98	NCIC Recertification 2/Guide	LVMPD	1
02-10-98	Investigations: Internship	LVMPD	9
08-21-98	K-9 Perimeter Class	LVMPD	3
08-92 to 05-98	Criminal Justice - Degree - Associate of Applied Science (A.A.S.) - dated 05-14-98 - 83 Credits	C.C.S.N.	1,245
01-00 to 05-00	Photography 170	C.C.S.N.	
05-24-00	Training Techniques	LVMPD	8
03-21-01	Patrol Response to Clandestine Drug Labs	LVMPD	2
05-24-01	Ecstasy & Other Drugs, The Pleasure Killers	LVMPD	7.5
07-18-01	Driver's Training II	LVMPD	8
08-27-01	NCIC/NCJIS Training 10132H-IIR	LVMPD	1
08-06 to 08-31-01	Crime Scene Analyst Academy - Criminalistics Bureau	LVMPD	175
09-08 to 09-10-01	Civilian Use of Force and Firearms Training - CCW permit granted	LVMPD	21
10-01-01	RC-Use of Force Video Training - Tape #1	LVMPD	15 Minutes
12-01-01	Field Training - Criminalistics Bureau	LVMPD	400
04-02-02	Chemical Enhancements of Bloodstains, Preliminary Steps	LVMPD	2
04-03-02	Documentation of Footwear & Tire Impressions	LVMPD	1
04-03-02	Major Case Prints	LVMPD	3
04-04-02	Criminal Law	LVMPD	2

0197

DATE	CLASS TITLE	AGENCY	CREDIT HOURS
04-22-02	Forensic Anthropology	LVMPD - Criminalistics Bureau	1.5
05-22-02	Handgun Refresher Training	LVMPD	2
05-22-02	Handgun Qualification 2	LVMPD	1
09-03-02	Firearms Qualification 3	LVMPD	1
10-23-02	Stress Management	LVMPD	2
11-05-02	Handgun Qualification 4	LVMPD	1
03-11-03	Handgun Qualification 1	LVMPD	1
03-27-03	Testifying in Court	LVMPD	7
05-07-03	Handgun Qualification 2	LVMPD	1
06-04-03	Firearms Training Simulator	LVMPD	1

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: Peter Schellberg

P# 5413

Date: 8-28-03

CURRENT CLASSIFICATION		
	<i>Classification</i>	<i>Minimum Qualifications</i>
	Crime Scene Analyst I	AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation.
	Crime Scene Analyst II	18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I.
X	Senior Crime Scene Analyst	Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst.
	Crime Scene Analyst Supervisor	Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field.
FORMAL EDUCATION		
<i>Institution</i>	<i>Major</i>	<i>Degree/Date</i>
Saddleback Community College-Viejo, CA	Administration of Justice	Degree
TESTIMONY		
<i>Yes</i>	<i>No</i>	
EMPLOYMENT HISTORY		
<i>Employer</i>	<i>Title</i>	<i>Date</i>
LVMPD	Sr. Crime Scene Analyst	1-27-97

Curriculum Vitae
JEFFREY MARC SMITH

Las Vegas Criminalistics Bureau
P# 8177

EMPLOYMENT

11/03 – Present **Las Vegas Metropolitan Police Department**
CSA I, CSA II

EDUCATION

12/95 **Texas Tech. University**
B. B. S. Degree, Accounting

➤ **American Institute of Applied Science (AIAS)**
Forensic Science 101, 230 hours

➤ **American Institute of Applied Science (AIAS)**
Forensic Science 201, 230 hours

COURT TESTIMONY

- District Court
- Federal Court
- Justice Court
- Grand Jury

Curriculum Vitae

**Las Vegas Criminalistics Bureau
Statement of Qualifications**

Name: **WRIGHT, Amanda**

P# 9974

Date: 05-14-07

CURRENT CLASSIFICATION

	<i>Classification</i>	<i>Minimum Qualifications</i>
X	Crime Scene Analyst I	AA Degree with major course work in Criminal Justice, Forensic Science, Physical Science or related field, including specialized training in Crime Scene Investigation.
	Crime Scene Analyst II	18 months - 2 years continuous service with LVMPD as a Crime Scene Analyst I.
	Senior Crime Scene Analyst	Two (2) years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst.
	Crime Scene Analyst Supervisor	Four (4) years continuous service with LVMPD and completion of probation as a Senior Crime Scene Analyst. Must have the equivalent of a Bachelor's Degree from an accredited college or university with major course work in Criminal Justice, Forensic Science, Physical Science or related field.

FORMAL EDUCATION

<i>Institution</i>	<i>Major</i>	<i>Degree/Date</i>
University of New Haven	Forensic Science	Bachelor of Science - January 2006
Bowdoin College	Biochemistry	Bachelor of Arts - May 2001

TESTIMONY

<i>Yes</i>	<i>No</i>	

EMPLOYMENT HISTORY

<i>Employer</i>	<i>Title</i>	<i>Date</i>
LVMPD	CSAI	05-14-07 to


CLERK OF THE COURT

NWEW
DAVID M. SCHIECK
SPECIAL PUBLIC DEFENDER
Nevada Bar #0824
RANDALL H. PIKE
Deputy Special Public Defender
Nevada Bar #1940
CHARLES A. CANO
Deputy Special Public Defender
Nevada Bar #5901
330 So. Third Street, Suite #800
Las Vegas, Nevada 89155
(702) 455-6265
FAX: (702) 455-6273
E-MAIL: rpike@clarkcounty nv.gov
E-MAIL: canoca@clarkcountynv.gov
Attorneys for Jason Jones

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,)	CASE NO. C-12-285488-1
Plaintiff)	DEPT. NO. 21
vs.)	
JASON JONES, ID 02735018,)	
Defendant.)	

NOTICE OF DEFENDANT'S WITNESSES

DATE: N/A
TIME: N/A

TO: THE STATE OF NEVADA, Plaintiff, and

TO: STEVEN WOLFSON, District Attorney, Attorney for Plaintiff

YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that Defendant, JASON JONES, by and through his attorneys, DAVID M. SCHIECK, Special Public Defender, RANDALL H. PIKE, Deputy Special Public Defender, and CHARLES A. CANO, Deputy Special Public Defender, intends to call the following witnesses:

NAME

ADDRESS

Annaleka Steward

2300 Rock Springs Dr. #1047
Las Vegas, NV

Brittany Henry

2300 Rock Springs Dr. #1047
Las Vegas, NV

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712 N. Figueroa Place #8

Wilmington, CA

712 N. Figueroa Place #8

Wilmington, CA

1960 Gramercy Ave

Los Angeles, CA 90047

7013 Glasgow Ave.

Los Angeles, CA 90045

330 S Third Street

Las Vegas NV 89155

Tammy Wells

Clifton Stewart

Fahem Faquir

Velda Faquir

Joseph Perez, Criminal Investigator

In addition, the Defense reserves the right to call any witnesses noticed by the State of

Nevada.

DATED this 11th day of January, 2013.

DAVID M. SCHIECK

SPECIAL PUBLIC DEFENDER

/s/ CHARLES A. CANO

RANDALL H. PIKE

CHARLES A. CANO

Attorney for Jason Jones

330 So. Third Street, Suite #800

Las Vegas, Nevada 89155

(702) 455-6265

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that service of the above and foregoing, was made on January 11, 2013,

by Electronic Filing to:

DISTRICT ATTORNEY'S OFFICE

email: pdmotions@ccdany.com

/s/ Kathleen Fitzgerald

Legal Executive Assistant for
Special Public Defender


CLERK OF THE COURT

1 **SLOW**
2 **STEVEN B. WOLFSON**
3 **Clark County District Attorney**
4 **Nevada Bar #001565**
5 **NELL E. CHRISTENSEN**
6 **Chief Deputy District Attorney**
7 **Nevada Bar #008822**
8 **200 Lewis Avenue**
9 **Las Vegas, Nevada 89155-2212**
10 **(702) 671-2500**
11 **Attorney for Plaintiff**

7 **DISTRICT COURT**
8 **CLARK COUNTY, NEVADA**

9 **THE STATE OF NEVADA,**

10 **Plaintiff,**

11 **-vs-**

12 **JASON JONES,**
13 **#2735018**

14 **Defendant.**

CASE NO: C-12-285488-1

DEPT NO: XX1

15 **SECOND SUPPLEMENTAL NOTICE OF WITNESSES**
16 **AND/OR EXPERT WITNESSES**
17 **[NRS 174.234]**

18 **TO: JASON JONES, Defendant; and**

19 **TO: RANDY PIKE and CHARLES CANO, Special Public Defenders,**
20 **Counsel of Record:**

21 **YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF**
22 **NEVADA intends to call the following witnesses in its case in chief:**

23 **These witnesses are in addition to those witnesses endorsed on the Information and**
24 **any other witness for which a separate Notice has been filed. *indicates new witness added**

25 **YOU, AND EACH OF YOU, WILL PLEASE TAKE NOTICE that the STATE OF**
26 **NEVADA intends to call expert witnesses in its case in chief as follows:**

27 **The substance of each expert witness testimony and copy of all reports made by or at**
28 **the direction of the expert witness have been provided in discovery.**

A copy of each expert witness curriculum vitae, if available, is attached hereto.

1	<u>NAME</u>	<u>ADDRESS</u>
2	ACEVEDO, N. – VALLEY MORTUARY	
3	ADAM, ZACHARY – LVMPD P#9028	
4	ADAME, GABRIEL – 3450 NORTH HUALAPAI WAY, #1014, LVN 89129	
5	AGATONE, FRANK – LVMPD P#13325	
6	AHLIN, JASON – LVMPD P#13432	
7	BANKS – LVFD RESCUE UNIT 301	
8	BARELA, RICHARD – LVMPD P#4505	
9	BARRINGER, DAMON – LVMPD P#7178	
10	BECHLER, MICHAEL – LVMPD P#4701	
11	BECK, KEVIN – LVMPD P#9629	
12	BECK, ZACHARY – LVMPD P#9028	
13	BICHSEL, JAMES – FORENSIC TECH – CORONER'S OFFICE	
14	BILYEU, RICHARD – LVMPD P#7524	
15	BOUCHER, DOLPHIS – LVMPD P#4636	
16	BREWER, WILLIAM – LVMPD P#6732	
17	BROTHERSON, DEBORAH – LVMPD P#4931 (or designee): CRIME SCENE	
18	ANALYST: Expert in the identification, documentation, collection and preservation of	
19	evidence and is expected to testify as an expert to the identification, documentation,	
20	collection and preservation of the evidence in this case.	
21	BROWN, JIMMIE – 1416 F ST., #8, LVN 89106	
22	BROWNEE, TRACY – LVMPD P#9975 (or designee): CRIME SCENE ANALYST:	
23	Expert in the identification, documentation, collection and preservation of evidence and is	
24	expected to testify as an expert to the identification, documentation, collection and	
25	preservation of the evidence in this case.	
26	///	
27	///	
28	///	

1 BURNS, LARRY – LVMPD P#3170
2 BUTLER, JOVONNE, 1416 F STREET, #16, LVN 89106
3 CAREY, KEVIN – LVMPD P#8739
4 COLEMAN, LORETTA – 1416 F ST., #7, LVN 89106
5 COLEMAN, WILLIAM – 1416 F ST., #16, LVN 89106
6 COPLEY, BRANDON – LVMPD P#14462
7 CORONA, ANGEL – ADDRESS UNKNOWN
8 CORONA, ARMANDO – ADDRESS UNKNOWN
9 CORONA, DESIDERIO – ADDRESS UNKNOWN
10 CORONA, ELIAS – ADDRESS UNKNOWN
11 CORONA, JORGE – ADDRESS UNKNOWN
12 CORONA, LUIS – ADDRESS UNKNOWN
13 CORONA, MARIO – 1328 STEVENS, LVN 89110
14 CORONA, MICHAEL – 3650 E. LAKE MEAD, #123, LVN 89115
15 CUSTODIAN OF RECORDS – AT & T WIRELESS
16 CUSTODIAN OF RECORDS – CRICKET COMMUNICATIONS, 21575 RIDGETOP
17 CIRCLE, STERLING, VA
18 CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER
19 CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS
20 CUSTODIAN OF RECORDS – LVMPD RECORDS
21 CUSTODIAN OF RECORDS – METRO PCS
22 CUSTODIAN OF RECORDS – SPRINT
23 DOUGHERTY, ED – DISTRICT ATTORNEY INVESTIGATOR
24 DUNN, MICHAEL – LVMPD P#13003
25 ///
26 ///
27 ///
28 ///

1 DUTRA, DR. TIMOTHY - A medical doctor, employed by the Clark County Coroner's
2 Office as a Deputy Medical Examiner/Forensic Pathologist. He is an expert in the area of
3 forensic pathology and will give scientific opinions related thereto. He is expected to testify
4 regarding the cause and manner of death of Jaime Corona.

5 FARMER, FRANK - LVMPD P#6528

6 GILLIS, MATTHEW - LVMPD P#6432

7 GLASS, RYAN - LVMPD P#13461

8 GOUGH, P. - VALLEY MORTUARY

9 GRAY, BRANDON - AMR UNIT 3933

10 GREALIS, NOREEN - LVMPD P#13572 (or designee): CRIME SCENE ANALYST:

11 Expert in the identification, documentation, collection and preservation of evidence and is
12 expected to testify as an expert to the identification, documentation, collection and
13 preservation of the evidence in this case.

14 HALL, RICHARD - LVMPD P#6756

15 HARRIS, CAPT. - LVFD ENG UNIT 201

16 HART, RICHARD - LVMPD P#7527

17 HERRERA, VINCENT - 1416 F ST., #1, LVN 89106

18 HONAKER, JAMIE - DISTRICT ATTORNEY INVESTIGATOR

19 IVIE, TRAVIS - LVMPD P#6405

20 JACKSON, BRIAN - LVMPD P#9690

21 JORDAN, K. - LVMPD P#3715

22 JUNG, STEVEN - LVMPD P#4043

23 KOWALSKI, BRIAN - LVMPD P#8550

24 KRYLO, JAMES - LVMPD P#5945 (or designee): FIREARMS/TOOLMARK
25 EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the
26 field of firearm and toolmark comparisons and is expected to testify thereto.

27 LAFRENIERE, JASON - LVMPD P#7570

28 LAUTZENHEISER, SCOTT - CLARK COUNTY CORONER'S OFFICE

1 LEHMANN, STEPHEN – LVMPD P#13885
2 LONG, ALLEN – LVMPD P#9189
3 MALDONADO, TOBY – LVMPD P#3408
4 MCEWEN, JOSHUA – LVMPD P#10110
5 MCGHEE, EBONY – LVMPD P#5158 (or designee): CRIME SCENE ANALYST: Expert
6 in the identification, documentation, collection and preservation of evidence and is expected
7 to testify as an expert to the identification, documentation, collection and preservation of the
8 evidence in this case.
9 MCMEANS, TYLER – LVMPD P#13407
10 MEDINA, ROBERTO – LVMPD P#7422
11 MELVIN, JOSHUA – LVMPD P#13392
12 MIELE, SUZANNE – FORENSIC TECH – CORONER'S OFFICE
13 MILLER, MICHAEL – LVMPD P#14297
14 MURRAY, SCOTT – LVMPD P#4147
15 MYERS, RONALD – AMR UNIT 3933
16 OLIVAS, KAZANDRA – 1416 F ST., #1, LVN 89106
17 PARAYNO, EDUARDO – LVMPD P#14464
18 PARRA, JOSEPH – LVMPD P#10025
19 PEPPER, J. – LVMPD P#13479
20 RAMIREZ, FRANCISCA – 3650 E. LAKE MEAD BLVD., #123, LVN 89115
21 REVELS, JEROME – DISTRICT ATTORNEY INVESTIGATOR
22 ROGERS, ROBERT – LVMPD P#2858
23 SANBORN, TATE – LVMPD P#5450
24 SANTOS, JONATHAN – LVMPD P#14098
25 SAUL, ROBERT – 1769 ROYAL ESTATES, LVN 89115
26 SCOTT, JON – LVMPD P#4532
27 SHEFFIELD, JAMES – 1416 F ST., #9, LVN 89106

28 ///

1 SHELLBERG, PETER – LVMPD P#5413 (or designee): CRIME SCENE ANALYST:
2 Expert in the identification, documentation, collection and preservation of evidence and is
3 expected to testify as an expert to the identification, documentation, collection and
4 preservation of the evidence in this case.

5 SHOEMAKER, JASON – LVMPD P#8455

6 SINK, JAMES – LVMPD P#8757

7 SMITH, JEFFREY – LVMPD P#8177 (or designee): CRIME SCENE ANALYST: Expert
8 in the identification, documentation, collection and preservation of evidence and is expected
9 to testify as an expert to the identification, documentation, collection and preservation of the
10 evidence in this case.

11 TAFOYA, STEVE – LVMPD P#4435 (or designee): COMPUTER EXPERT: Expert in the
12 area of electronic media, electronic communication and computer technology and to the
13 collection and preservation of evidence and is expected to testify as an expert to the
14 identification, documentation, retrieval, collection and preservation of the evidence in this
15 case.

16 THOMAS, KRISTINA – LVMPD P#13574

17 VACHON, CRYSTINA - Bexar County Forensic Science Center, Criminal Investigation
18 Laboratory, 7337 Louis Pasteur, San Antonio, Texas 78229-4565: Forensic Scientist-
19 Conducts forensic testing and analyses in the area of Trace Evidence. Interprets test results
20 and prepares forensic reports for law enforcement personnel on criminal investigations.

21 VALLAD, JASON – LVMPD P#12961

22 VORCE, RICHARD – LVMPD P#4055

23 WALTER, BRIAN – LVMPD P#8080

24 WARREN, BRICIE – LVMPD P#12893

25 WILLIAMS, DENISE – ADDRESS UNKNOWN

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27 ///

28 ///

1 WRIGHT, AMANDA - LVMPD P#9974 (or designee): CRIME SCENE ANALYST:
2 Expert in the identification, documentation, collection and preservation of evidence and is
3 expected to testify as an expert to the identification, documentation, collection and
4 preservation of the evidence in this case.

5 STEVEN B. WOLFSON
6 District Attorney
7 Nevada Bar #001565

8 BY


9 NELL E. CHRISTENSEN
10 Chief Deputy District Attorney
11 Nevada Bar #008822

12
13
14 **CERTIFICATE OF ELECTRONIC FILING**

15 I hereby certify that service of State's Notice was made this 14th day of January,
16 2012, by Electronic Filing to:

17 RANDY PIKE, Special Public Defender
18 CHARLES CANO, Special Public Defender
19 E-mail Address: RPike@ClarkCountyNV.gov
20 canoca@ClarkCountyNV.gov
21 KFitzger@ClarkCountyNV.gov

22 BY


23 Secretary for the District Attorney's Office
24
25
26
27

28 sam/GCU