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STEVE WOLFSON
Clark County District Attorney
200 Lewis Avenue, 3rd Floor
Las Vegas, Nevada 89155

ADAM LAXALT
Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717
(702) 687-3538

Counsel for Respondent

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STEVEN DALE FARMER
Case No. 65935

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1 CASE NO. C249593

2
3 IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
4 COUNTY OF CLARK, STATE OF NEVADA

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7 THE STATE OF NEVADA,)
8 Plaintiff,) SUP. CT. NO. G65935
9 vs.) CASE NO. 08F10344X
10 STEVEN D. FARMER,)
11 Defendant.)

12 REPORTER'S TRANSCRIPT OF PROCEEDINGS

13
14 BEFORE THE HONORABLE ANN E. ZIMMERMAN
15 JUSTICE OF THE PEACE
16 WEDNESDAY, JUNE 4, 2008
17 8:00 A.M.

18 APPEARANCES:

19 For the State: , ESQ.
20 DEPUTY DISTRICT ATTORNEY
21
22 For the Defendant: , ESQ.
23 DEPUTY PUBLIC DEFENDER
24

25 Reported by: CHRISTA BROKA, CCR. No. 574

1
2
3 ATTEST: FULL, TRUE AND ACCURATE
4 TRANSCRIPT OF PROCEEDINGS.

5
6 /s/Christa Broka
7 CHRISTA D. BROKA, CCR 574
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1 LAS VEGAS, CLARK COUNTY, NEVADA,
2 JUNE 4, 2008 AT 8:00 A.M.
3 PROCEEDINGS

4
5 THE COURT: Steven Farmer, 08F10344X. Good
6 morning, sir.

7 THE DEFENDANT: Good morning.

8 THE COURT: Did you receive a complaint this
9 morning?

10 THE DEFENDANT: Yes, ma'am.

11 THE COURT: You're charged with three counts
12 of sexual assault and two count of open or gross
13 lewdness. Do you understand what you are charged with?

14 THE DEFENDANT: Yes, ma'am.

15 THE COURT: Can you afford to hire an
16 attorney?

17 THE DEFENDANT: No, ma'am.

18 THE COURT: I'm going to appoint the public
19 defender to represent you and set this case for a
20 preliminary within 15 days.

21 THE DEFENDANT: Can I get an O.R.?

22 THE COURT: Not on these charges, sir. Your
23 bail is \$32,000 cash or surety. You need 15 percent to
24 bail out. That's standard bail for these charges, sir.

25 THE CLERK: June 4th, 9:00.

1 IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
2 COUNTY OF CLARK, STATE OF NEVADA

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4
5 STATE OF NEVADA,)
6 Plaintiff,)

7 vs.) Case No. 08F10344X

8 STEVEN D. FARMER,) ATTEST RE: NRS 239B.030
9 Defendant,)

10)

11 STATE OF NEVADA)

12) ss
13 COUNTY OF CLARK)

14 I, Christa D. Broka, a Certified Shorthand
15 Reporter within and for the county of Clark and the
16 State of Nevada, do hereby certify:

17 That REPORTER'S TRANSCRIPT OF PROCEEDINGS was
18 reported in open court pursuant to NRS 3.360 regarding
19 the above proceedings in Justice Court Department 8,
20 2008, Lewis Avenue, Las Vegas, Nevada.

21 That said TRANSCRIPT:

22 X Does not contain the Social Security number
23 of any person.

24 Contains the Social Security number of a
25 person.

1 ATTEST: I further certify that I am not
2 interested in the events of this action.

3

4

As Christa Broka

5

CHRISTA C. BROKA, CCR 574

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1 CASE NO. 0849693

2
3 IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
4 COUNTY OF CLARK, STATE OF NEVADA
5

6
7 THE STATE OF NEVADA,

8 Plaintiff,

9 vs.

10 STEVEN D. FARMER,

11 Defendant.

12 SUP. CT. NO. G65935

13 CASE NO. 08F10344X

14
15 REPORTER'S TRANSCRIPT OF PROCEEDINGS

16
17 BEFORE THE HONORABLE ROBERT WALSH
18 PRO TEMPORE JUSTICE OF THE PEACE
19 TUESDAY, JUNE 17, 2008
20 8:00 A.M.

21 APPEARANCES:

22 For the State: S. CLARKE, ESQ.
23 DEPUTY DISTRICT ATTORNEY

24 For the Defendant: S. ROUNDTREE, ESQ.
25 G. COYER, ESQ.
DEPUTY PUBLIC DEFENDERS

26 Reported by: CHRISTA BROKA, CCR. No. 574

1 MS. ROUNDTREE: I don't believe so.

2 MS. CLARKE: We had faxed over a copy of

3 last Thursday but I wanted to file it in open court this
4 morning if I could. I know Miss Roundtree has an
5 objection to it, however, the only reason it wasn't
6 filed all together to begin was the timing of the
7 victims coming forward and the need to keep Mr. Farmer
8 in custody so we can get these cases filed.

9 THE COURT: And your objection is?

10 MS. ROUNDTREE: Your Honor, basically what
11 we have here is a consolidation of cases which per
12 statute should be done in District Court. The state
13 does we agree have an avenue whereby they could dismiss
14 the cases and re-file a subsequent case which is before
15 the preliminary hearing stage, however, that is not the
16 avenue they are taking. Our objection is this is a
17 consolidation and this Court does not have jurisdiction
18 for the consolidation and they have not followed the
19 statute for dismissal and subsequently re-filing.

20 MS. CLARKE: Judge, it's prior to the
21 preliminary hearing and we are certainly allowed to
22 amend the complaint. We provided all the discovery. We
23 have provided all of the discovery and provided all the
24 victims. We're dismissing in Justice Court 5 and we are
25 going to dismiss the case here in Justice Court 8. We

1 LAS VEGAS, CLARK COUNTY, NEVADA,
2 JUNE 17, 2008 AT 8:00 A.M.
3 PROCEEDINGS
4

5 THE COURT: Steven D. Farmer, 08F10344X.

6 MS. CLARKE: Good morning, Your Honor.

7 Summer Clarke for the state.

8 MS. ROUNDTREE: Stacy Roundtree and Gregory
9 Coyer on behalf of Mr. Farmer.

10 THE COURT: Good morning.

11 MS. CLARKE: Your Honor, this preliminary
12 hearing today was called off. What happened in this
13 case was we had an original victim that came forward and
14 after that victim came forward more started to come
15 forward, so the case started trickling through into our
16 office because of that varios cases were filed. The
17 first one was today. There's another in Justice Court 5
18 on Thursday. There's a third case that is on for
19 calendar on June 26th here in this court as well. We
20 called this case off. The state had an amended criminal
21 complaint to file which includes all five victims. We
22 consolidated them into the lowest case number which is
23 this one.

24 THE COURT: Have you received a copy of this
25 Miss Roundtree?

1 can put them into the lowest case number and put them
2 all together and we are certainly allowed to file an
3 amended adding victims and changing charges. We are not
4 in District Court yet and no preliminary hearing has
5 been held.

6 THE COURT: The defense's objection is noted
7 for the record but it's denied. Do you want to set a
8 preliminary hearing within 15 days or do we want to have
9 that date you mentioned in this courtroom maybe have
10 both preliminary hearings set at that time or do you
11 want to set that for status?

12 MS. ROUNDTREE: I believe we contemplated
13 keeping the 26th date.

14 MS. CLARKE: Because it's the 17th we are
15 asking for two weeks from today and that be the hearing
16 we go forward on and vacate the 26th. We have five
17 victims that need to be re-subpoenaed.

18 THE COURT: Any of the victims here in court
19 today?

20 MS. CLARK: No, Your Honor.

21 THE COURT: You're looking at on or about
22 the July 1st?

23 MS. CLARKE: Yes.

24 THE COURT: Miss Roundtree, do you have a
25 preference?

1 MS. ROUNDTREE: No.
 2 THE COURT: July 1st at 9:00 a.m.
 3 MS. CLARKE: Thank you, Your Honor.
 4 THE COURT: Just so we are clear you are
 5 asking for this case and the other case that's set to be
 6 heard on the 26th?
 7 MS. CLARKE: I was going to come back on the
 8 26th and ask that case be dismissed unless we can do
 9 that now, that's fine.
 10 THE COURT: I hate to have to come back,
 11 Miss Roundtree, unless you want to make an argument
 12 before Judge Zimmerman.
 13 MS. ROUNDTREE: Perhaps we will look at
 14 providing a brief. We don't mind coming back. We are
 15 here everyday anyway.
 16 THE COURT: The 26th we will set for status.
 17 The preliminary hearing will be on the 1st.
 18 MS. CLARKE: Thank you.
 19 MS. ROUNDTREE: Thank you.
 20 * * * * *
 21 ATTEST: FULL, TRUE AND ACCURATE
 22 TRANSCRIPT OF PROCEEDINGS.
 23
 24 \s\Christa Broka
 25 CHRISTA D. BROKA, CCR 574

1 ATTEST: I further certify that I am not
 2 interested in the events of this action.
 3
 4 \s\Christa Broka
 5 CHRISTA D. BROKA, CCR 574
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1 IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
 2 COUNTY OF CLARK, STATE OF NEVADA
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 4
 5 STATE OF NEVADA,)
 6 Plaintiff,)
 7 vs.) Case No. 08F10344X
 8 STEVEN D. FARMER,) ATTEST RE: NRS 239B.030
 9 Defendant,)
 10 _____)
 11
 12 STATE OF NEVADA)
 13) ss
 14 COUNTY OF CLARK)
 15
 16 I, Christa D. Broka, a Certified Shorthand
 17 Reporter within and for the county of Clark and the
 18 State of Nevada, do hereby certify:
 19 That REPORTER'S TRANSCRIPT OF PROCEEDINGS was
 20 reported in open court pursuant to NRS 3.360 regarding
 21 the above proceedings in Justice Court Department 8,
 22 2014, Lewis Avenue, Las Vegas, Nevada.
 23 That said TRANSCRIPT:
 24 X Does not contain the Social Security number
 25 of any person.
 26 _____ Contains the Social Security number of a
 27 person.



ROSE HEART INC.

...and the heart of the community

Case #
000816-1021

First Name

MI

Last Name

DOB

Gender

SSN

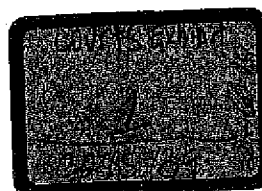
Date Rape Done

01/01/2001

Exhibit Image 01



EXAMED



A

ROSE
HEART INC.

Second Assault Nurse Examiner

Case #
080516-1021

Patient Image #3



CRESCENT MARKED ALONG WITH BETWEEN 5 AND 7
O'CLOCK

2008-05-16 14:14:14
LXMPD

B



Representing:
Centennial Hills, Desert Springs, Spring Valley, Summerlin and Valley Hospital Medical Centers

PERSONNEL ACTION FORM

EMPLOYEE #	NAME: Last, First	EFFECTIVE DATE
42482	Wolfe, Margaret	05/07/09
TO BE COMPLETED BY DEPARTMENT HEAD		
Action Type:	Status Change	Dept. Change
	Position Change	Facility Transfer
		Termination X
Facility Name:		
Facility#:	001 <input type="checkbox"/> 113 <input type="checkbox"/> 335 <input type="checkbox"/> 337 <input type="checkbox"/> 340 <input type="checkbox"/> Other	001 <input type="checkbox"/> 113 <input type="checkbox"/> 335 <input type="checkbox"/> 337 <input type="checkbox"/> 340 <input type="checkbox"/> Other
Position Title:		
Job Code:		
Department:		
Cost Center:		
Status:	F1	T1
FTE:		
Wage:		
Reason for Action	Involuntary termination for policy violation.	
Termination:	Voluntary: Yes No	Eligible for Rehire: Yes No
Position Information:	Position Control No.:	Req. No.:
Comments:		

Employee

Date

First Line Supervisor

Date

Human Resources Administrator

Date

Second Line Supervisor

Date

Administrative Signature (if over \$95,000)

Title

Date

COACHING AND COUNSELING NOTICE

Employee Name: Margaret Wolfe

Department: Emergency Department

Date: May 7, 2009

Supervisor: Amy Bochenek

Corrective Action Level

- ☐ Level One initial discussion to be maintained in department and employees Human Resources file
- ☐ Level Two Performance Improvement Plan to be maintained in department and employees Human Resources file*
- ☐ Level Three Final Warning to be maintained in department and employees Human Resources file*
- ☒ Level Four Termination to be maintained in department file and employees Human Resources file *

*** REQUIRES HR APPROVAL PRIOR TO DISCUSSION WITH EMPLOYEE**

Subject:

- ☐ Performance Improvement
- ☒ Behavior/Conduct Improvement
- ☐ Absenteeism and Tardiness Improvement
- ☐ Other

Prior Notifications

Level of Performance Improvement

Date

Subject

Incident Description and Supporting Details: As to what happened? Why did it happen? How can it be prevented in the future? It was brought to my attention this week that one of your co-workers saw your daughter in an ER bed receiving an IV fluid infusion. When the staff person questioned you, you told her to "shhhhh". Upon investigating this concern, it was discovered that your daughter was not checked in as a patient, and you did not obtain permission from your Charge Nurse to have your child with you. When I called you to discuss these concerns, you admitted you had brought your child to work with you, placed her in a bed, started an IV, and administered saline. You stated you had done this because she was ill, and you didn't want to leave the department short-staffed by calling into work. When asked why you did not discuss any of this with your Charge Nurse prior, you stated you didn't think it was a problem because you had worked at other hospitals where this was done.

The above actions are in violation of policies "Treatment of Family Members" and "Standard of Conduct" which prohibit employees from providing direct treatment to members of their family without prior approval/proper process and prohibit unauthorized use of hospital supplies and equipment.

These violations will result in termination of employment and State Board notification of violation of NAC 632.890 (#2, #18, and #21). It is recommended that you review the Nevada Nurse Practice Act.

Performance Improvement Plan (Required for Level Two and Level Three)

Employee Comments to Performance Improvement Plan

I have received a copy of this notification, have mutually agreed to the Plan as stated above, and accept responsibility to comply with the requirements of the plan.

Employee Signature

Date

Employee Comments:

Acknowledgments

My signature below indicates receipt of the disciplinary notice, not necessarily agreement. I understand that future behavior, action or activity of this type or failure to follow the action plan, may result in further disciplinary action, up to and including termination of employment.

Employee Signature

Date

atoull

Supervisor Signature

5/9/09 ^{emr} 5/7/09 ^{ab}

Date

Abdullah

Human Resources Signature

5/7/09

Date

Employee Comments:

Wish I had someone to
talk to it about it.
I am so scared & lonely.

It would have been nice
to know how much I got
for my ring & who has it.
But I can't know stuff
like that. My money. At
least I get to see it. 1900
Some day who ever wants it
enuff can go get the info from
Magsalk.

W
SM

July 10, 2013

I used to have dreams
for my life. I don't
any more.

I keep getting torn apart
by my boys and all the
mistakes I made.
When I was getting
depressed I had Marshal
live with his dad but
I didn't explain why.
I was because I that
I was best for him
because I was so lost.

I had Wisty go live with
her dad too because I
was better for her.
I didn't know I didn't
but because I

did - wanted what was best.

I wanted what was best for Marshal and at that time it wasn't me.

Misah had nowhere to go so he had to go thru the hell of living with me.

There is the reason he got so lost in life because I didn't know how to lead him.

I don't even know how to lead myself any more. This is not living. This is existing.

I don't want to any longer.

Marcia Petersen
7-10-2013

Note pad on Kindle
code 1215 has
important info init.

Home screen press
A right hand corner
Press on Yellow Notepad.

I love all of you but
I can't keep being torn
apart and I can't keep
a smile on my face
any more. The sadness
is too deep and no one
even knows.

Live Love Life

Live your life with love
and joy and happiness.

All my love

Mom
Z

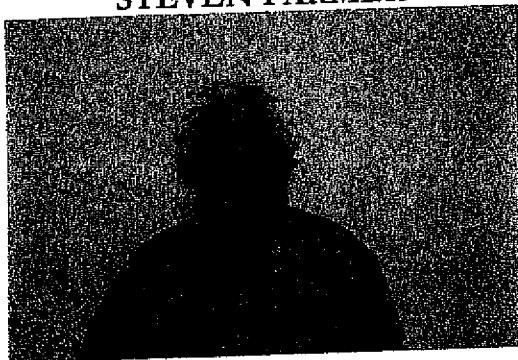
STATE OF NEVADA

VS.

STEVEN DALE
FARMER



STEVEN FARMER



HEATHER SHANK

- TWO INCIDENTS, NOT JUST ONE
- INCIDENT THAT TIM OBSERVED
- INCIDENT THAT HEATHER EXPERIENCED
- SO, THEY BOTH WOULD HAVE TO BE MISTAKEN

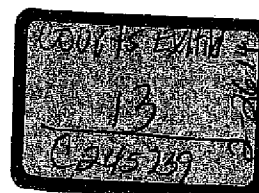


ASK YOURSELF WHY?

- WHY IS HE SO ATTENTIVE?
 - IF HOSPITALS ARE SO BUSY LIKE DEFENSE CLAIMS, HOW DOES HE HAVE THE TIME TO BE SO ATTENTIVE TO ALL OF THESE WOMEN?
- WHY WAIT UNTIL THE ELEVATOR TO START PULLING OFF THE LEADS?
 - "WE NEED TO TAKE THESE OFF BECAUSE THE LONGER THEY STAY ON, THE MORE THEY ARE GOING TO HURT TO GET OFF"
 - WHERE IS THE EMERGENCY, WHY DOES IT NEED TO BE DONE RIGHT THEN?
 - WHY NOT DO IT IN THE EMERGENCY ROOM?
 - WHY NOT DO IT WHEN SHE GETS TO HER ROOM WHERE THERE IS PRIVACY?
 - PROVIDES HIM HIS OPPORTUNITY

TIM LEHAN

- NO REASON TO DISLIKE DEFENDANT, FELT THAT HE WAS ATTENTIVE
- ABSOLUTELY NO PRECAUTIONS TAKEN:
 - NO OTHER NURSE PRESENT
 - DIDN'T USE DISCRETE METHODS



OTHER MEDICAL PERSONNEL

- KAREN GOODHART
- LORRAINE WESCOTT
- CHRISTINE MURRAY
- JEANINE JAMES (MARTIN)
- MARGARET WOLFE
- DR. SLAUGHTER
- TIM LEHAN
- CORRINE BROWN

DISCRETE METHODS

- TALK TO THE PATIENT, TELL THEM WHAT YOU ARE ABOUT TO DO, WALK THEM THROUGH THE PROCESS
- EXPOSE AS LITTLE AS POSSIBLE
 - USE THE GOWN TO COVER THE PRIVATE AREAS
 - USE THE GOWN TO TOUCH THE BODY PART, SO THERE IS AS LITTLE SKIN TO SKIN CONTACT AS POSSIBLE
- EVER ANY REASON TO FULLY EXPOSE A WOMAN'S BREAST DURING LEAD PLACEMENT/REMOVAL: NO
- LORRAINE WESCOTT: NEVER IN THIRTY YEARS HAS SHE HAD TO OPEN A GOWN LIKE THAT FOR EKG PATCHES
- CHRISTINE MURRAY: COMPLETELY INAPPROPRIATE
- DR. SLAUGHTER: I WOULD RIP THEM A NEW ONE

NO REPORT

- NEITHER OF THEM KNEW WHAT THE OTHER HAD EXPERIENCED
- HEATHER HAD JUST RECENTLY BEGAN HAVING SEIZURES, HEALTH WAS A MAIN CONCERN
- DEFENDANT'S CONDUCT:
 - DEFENDANT'S M.O. IS A GOOD ONE
 - "DON'T WANT TO BELIEVE THAT THINGS LIKE THAT CAN HAPPEN TO YOU IN A HOSPITAL."

MEDIA, MONEY, AND MAKING SENSE

- MEDIA:
 - NEVER CONTACTED THE MEDIA
 - NEVER DID ANY INTERVIEWS
 - DIDN'T SEE IT ON THE NEWS, CONTACTED BY OTHER PEOPLE
 - HEATHER'S GRANDMA CONTACTED HER
 - TIM LEHAN CALLED HIS BROTHER
 - BROTHER READ THE FIRST TWO LINES AND HE KNEW IT WAS THE SAME GUY
 - ONLY THING THAT DIDN'T MATCH UP, IS DEFENDANT HAD GIVEN HIM THE NAME OF DAVID

MONEY

- MONEY:
 - NEVER FILED A CIVIL SUIT
 - CONTACTED AT A MINIMUM OF FOUR TIMES BY CIVIL ATTORNEYS, NEVER RETURNED CALLS OR LETTERS
 - HAVEN'T RECEIVED A DIME

MAKING SENSE

- MOTIVE?
 - EVEN AFTER HEATHER HEARD ABOUT IT STILL NEEDED TO THINK ABOUT WHETHER OR NOT SHE WANTED TO REPORT:
 - KNEW IT WOULD BE A LONG PROCESS
 - KNEW IF IT HAPPENED TO SOMEBODY ELSE SHE HAD TO COME FORWARD
 - WHY COME AND TESTIFY:
 - TALK ABOUT THINGS FROM SIX YEARS AGO IF THEY DIDN'T HAPPEN
 - HAD TO COME IN HERE DISCUSS PERSONAL ISSUES WITH ALCOHOL AFTERWARDS
 - BEHAVIOR AT SUMMERLIN

SO FAR...

- HEATHER SHANK IS MISTAKEN
- TIM LEHAN IS MISTAKEN

ROXANNE CAGNINA



DEFENSE TOLD YOU:

- FINANCIAL DISTRESS:
 - HOUSE WAS UPSIDE DOWN
 - ALL OTHER CREDITORS PAID OFF IN CASH
 - ROXANNE LOST JOB AFTER THIS INCIDENT, NOT BEFORE
 - SCOTT WAS STILL EMPLOYED FULL TIME
- NEED FOR HUSBAND'S ATTENTION:
 - HE DIDN'T GO TO HOSPITAL
 - TWO CHILDREN
 - SEIZURES SINCE 2000
 - RELATIONSHIP AFTER ASSAULT
 - NO MORE SEX
 - TURNED TO PILLS AND ALCOHOL
 - DETACHED FROM HUSBAND AND CHILDREN

VICTIMS ARE VICTIMS FOR A REASON

- SHE WAS HIS PERFECT VICTIM:
 - PROVIDING THAT GREAT CARE AGAIN
 - EARNING HER TRUST, SCOPING OUT THE SITUATION
 - EASY TARGET
 - KNEW SHE HAD BEEN HAVING SEIZURES
 - KNEW SHE WAS ON HEAVY MEDICATIONS
 - SPOKE TO HER ABOUT IT CONTINUOUSLY
 - YOU SHOULD BE TIRED, YOU SHOULD BE SLEEPING, YOUR ON MEDICATIONS
 - PROBABLY DIDN'T THINK SHE WOULD REMEMBER
 - IF SHE DID REMEMBER, WHO WOULD BELIEVE HER?
 - HE GOES AS FAR WITH A VICTIM AS THEIR CONDITION WILL ALLOW

TIMELINE

DEFENSE TIMELINE

- DECISION TO ADMIT HER FROM EMERGENCY ROOM TO HOSPITAL AT 2:30 AM
- RECEIVES CARE UP UNTIL DEPARTURE
- KAREN GOODHART'S LAST ENTRY IS AT 3:45
- CHRISTINE MURRAY NOTIFIED BY THE DEFENDANT AT 4:40 AM THAT ROXANNE HAS COME TO THE FLOOR
- CHRISTINE AND CORRINE TREAT ROXANNE AFTER THAT

3:51 AM

TIMING

- DECISION TO ADMIT HER FROM EMERGENCY ROOM TO HOSPITAL AT 2:30 AM
- HOSPITAL ROOM IS ASSIGNED AT 2:35 AM
- KAREN GOODHART'S LAST ENTRY IS AT 3:45
 - THEN ROXANNE SENT UP TO 7TH FLOOR
- CHARGE NURSE OR CLERK ON THE 7TH FLOOR DOCUMENTS ROXANNE PHYSICALLY COMING ON TO THE 7TH FLOOR AT 0351 HRS WHICH IS 3:51 IN THE MORNING
- CHRISTINE MURRAY IS NOT NOTIFIED BY THE DEFENDANT UNTIL 4:40 THAT ROXANNE HAS COME TO THE FLOOR

[illegible][illegible]

CHRISTINE MURRAY

- BROUGHT TO FLOOR AT 3:51 IN THE AM
- DEFENDANT ALERTS CHRISTINE MURRAY AT 4:40
 - SHE IS WITH PATIENT
 - LEAVES ABOUT 3-5 MINUTES LATER
- STARTS FILLING OUT PAPERWORK ON COMPUTER AROUND 4:50
- 3:51 TO 4:40, ROXANNE AND THE DEFENDANT ARE COMPLETELY UNACCOUNTED FOR
 - GOODHART NOTICED HIM MISSING FOR 30-40 MINUTES
 - EVEN THOUGH AVERAGE TRANSPORT WAS 5 TO 15 MINUTES (GOODHART AND WOLFE)
 - WHAT WAS HE DOING FOR 49 MINUTES!!!!

SEXUALLY ASSAULTING ROXANNE CAGNINA

- NOBODY IS GOING TO LOOK FOR A PATIENT THEY DON' T KNOW IS THERE
- IF HE DORSN' TNOTIFY CHRISTINE MURRAY THAT ROXANNE HAS ARRIVED, HE HAS A FREE PASS TO DO WHATEVER HE WANTS DURING THAT TIME PERIOD
- CHRISTINE MURRAY DOESN' T KNOW HER PATIENT HAS ARRIVED UNTIL 49 MINUTES LATER
 - UPON ARRIVAL, ROXANNE CONFUSED, FIXING GOWN, ASKING IF IT'S ONLY GIRLS
 - SLEEPS AFTER THAT

MEDICATIONS

- EFFECT ON ROXANNE:
 - NOT GOING TO BE PERFECT
 - "THAT" S WHY SHE IS HIS VICTIM
 - 911 CALL
 - CELL RECORDS
 - PHOTOS ON PHONE

MEDICATIONS

- THIS IS A HOSPITAL, IS IT THAT CRAZY THAT SOMEONE WOULD WANT MEDICATION TO FEEL BETTER?
- SOMEONE WHO HAD NOT ONE, NOT TWO, BUT THREE SEIZURES WHILE AT THE HOSPITAL
- FELL AND HIT HER HEAD, BIT HER TONGUE
 - NOTED CONTUSION
 - ABRASION TO TONGUE

KAREN GOODHART

- INTERVIEWED ON 5/30, SAYS ABSOLUTELY NOTHING ABOUT CONCERNS REGARDING ROXANNE'S MEDICINE INTAKE
 - EVEN SAYS THAT ROXANNE "WOULD HAVE BEEN VERY SLEEPY, BUT HER MOTOR SKILLS WOULD HAVE BEEN FINE"
- YET, IN CIVIL DEPOSITION, YEARS LATER, WHILE STILL EMPLOYED BY CENTENNIAL HILLS WHO IS GETTING SUED:
 - TOOK ENOUGH MEDS TO KILL A HORSE
 - SUCKED IT UP LIKE CANDY
- YET AT THE END OF HER INTERVIEW SHE IS ASKED IF THERE IS ANYTHING IMPORTANT THAT THE POLICE SHOULD KNOW:
 - NOTHING SHE CAN THINK OF, NO

DNA

- CERTAIN FORMS OF DNA ARE STRONGER THAN OTHERS
 - BLOOD, SEMEN, SALIVA, VAGINAL FLUID CARRY MUCH STRONGER LEVELS OF DNA THAN "TOUCH" DNA
- VERY DIFFICULT TO FIND TOUCH DNA INSIDE SOMEONE'S VAGINA
 - BODY FLUIDS MASK THE OTHER DNA
 - URINATING/WIPING

DNA

- VAGINAL SWABS
 - MALE DNA WAS DETECTED, BUT NO DNA PROFILE COULD BE MADE
 - IF ROXANNE CAGNINA HADN'T HAD SEXUAL RELATIONS WITH HER HUSBAND IN OVER 5 DAYS, WHO'S DNA WOULD BE IN THERE
- LABIAL SWABS
 - MALE DNA, DETECTED, PARTIAL PROFILE WAS RECOVERED BUT NOT ENOUGH TO TEST FOR IDENTIFICATION
 - IF SHE HADN'T HAD SEX FOR FIVE DAYS THEN WHO'S DNA COULD THAT BE
 - FIVE DAYS OF URINATING, WIPING, BATHING, HOW COULD THAT BE HER HUSBAND'S?

DNA

- BREAST: MALE DNA FOUND, NOT ENOUGH FOR COMPARISON
- THIGHS: TWO MALE PROFILES
 - ASSUME IT IS HER HUSBAND
 - WHO'S THE OTHER PERSON
- FACE SWABS:
 - MAJOR PROFILE CONSISTENT WITH STEVEN FARMER
- WHY WOULD HIS DNA BE ON HER FACE?
 - ABSOLUTELY NO EVIDENCE SHE WAS EVER ON OXYGEN DURING HOSPITAL STAY

ROXANNE CAGNINA AND DNA

- DEFENDANT INSERTED HIS FINGERS INTO HER VAGINA
- DEFENDANT RUBBED BOTH OF ROXANNE'S BREASTS
- DEFENDANT RUBBED HER THIGHS
- DEFENDANT RUBBED HER FACE
- MALE DNA FOUND INSIDE HER VAGINA AS WELL AS ON HER VAGINAL LIPS
- MALE DNA FOUND ON HER BREASTS, NOT STRONG ENOUGH TO ID
- MALE DNA FOUND ON HER THIGHS
- DEFENDANT'S DNA OR HIS PATERNAL RELATIVES FOUND ON HER FACE

DEFENDANT'S REACTION

- TESTIMONY OF DETECTIVE CODY
- IMMEDIATELY STARTED TO CLENCH HIS HANDS, RUB THEM TOGETHER
- SHE GOES BACK TO THE OBSERVATION ROOM, LIVE FEED SHOWS DEFENDANT:
 - PICK UNDER EACH ONE OF HIS FINGERNAILS
 - BITE HIS FINGERNAILS OFF
 - PUT EACH OF HIS FINGERS INSIDE HIS MOUTH, SUCKED ON THEM ALL THE WAY DOWN TO THE FIRST KNUCKLE
- WHY WOULD HE BE DOING THAT???
- HAD TO PUT HIM BACK INTO HANDCUFFS BECAUSE HE REFUSED TO STOP

CIVIL LAWSUIT

- HUGE ISSUE MADE ABOUT ROXANNE CAGNINA SUING THE HOSPITAL
- SHOULD SEEKING JUSTICE IN ONE COURT OF LAW PREVENT YOU FROM SEEKING JUSTICE IN ANOTHER?
- CONSIDER THE HOSPITAL'S CONDUCT

HOSPITAL CONDUCT

- PATIENT IS HYSTERICAL, CRYING, STATING THAT SHE WAS RAPED DURING THE NIGHT BY A MALE CERTIFIED NURSING ASSISTANT
- SHE PERSONALLY GIVES YOU A DESCRIPTION AS WELL AS HIS NUMBER
- AND WHO DO YOU CALL...

STEVEN FARMER

LORRAINE WESCOTT BEFORE POLICE ARRIVE

- DOESN'T CALL 911
- DOESN'T GET ROXANNE CAGNINA ANY CARE FOR HER VAGINAL AREA
- SHE CALLS THE DEFENDANT AND HER "SUPERVISOR"
- BUSY THAT DAY: WORRIED ABOUT STAFFING
- TELLS ROXANNE, "YOU NEED TO FOCUS ON YOUR HEALTH, IF YOU WANT TO PURSUE THAT LATER YOU CAN"

LORRAINE WESCOTT AFTER POLICE ARRIVE

- WHEN POLICE GET THERE:
 - REFUSES TO GIVE THEM ANY PERSONAL INFORMATION ABOUT FARMER
 - REFUSES TO BE HELPFUL AT ALL, "RESISTANT TO QUESTIONS"
 - HAD TO BE WARNED BY DET. SAUNDERS THAT SHE WOULD BE FACING ARREST FOR OBSTRUCTING A POLICE OFFICER

HOSPITAL CONDUCT

- DETECTIVES AND SERGEANT PASS OUT BUSINESS CARDS TO HOSPITAL STAFF AND ADMINISTRATION
- LET THE STAFF KNOW THEY NEED TO GET IN CONTACT WITH FARMER IMMEDIATELY, NEED TO KNOW HIS WHEREABOUTS
- YET, WHEN FARMER IS ARRESTED THERE IS SERGEANT PENCE'S BUSINESS CARD SITTING ON HIS NIGHTSTAND

HOSPITAL CONDUCT

- DETECTIVE SAUNDERS GOES TO HR AND SECURITY, REQUESTS VIDEO:
 - ASSURED HE WILL GET IT
 - CHECKS UP ON IT 2 OR 3 MORE TIMES, IT'S NOT READY YET
 - FOURTH TIME: SORRY, IT'S BEEN ERASED

MICHELLE SIMMONS

- TALK ABOUT EXCHANGE OF THE NUMBERS AND ALLEGATION OF SEXUAL ABUSE
 - QUIET FOR SEVERAL SECONDS, ADMITS TO IT
 - DOES NOT APOLOGIZE
- BREAK IN CONVERSATION, METRO ON THE OTHER LINE
- GETS BACK ON THE LINE, MORE CONVERSATION
- END OF CONVERSATION:
 - I'M SORRY, I'M JUST SORRY
 - I ASSUME I'M SUSPENDED

PHONE RECORDS

- LOOK AT PHONE ACTIVITY IN THE EARLY MORNING HOURS BOTH BEFORE AND AFTER ASSAULT
 - LAST CALL TO SCOTT IS AT 2:53 AM
 - NEXT PHONE CALL IS AT 6:16 AM

MEDIA

- PHONE CALLS
 - ANGRY
 - HURT
 - MISTREATED
 - BRUSHED ASIDE
 - CONTACTED THE MEDIA

MEDIA AND ATTORNEYS

- SEVERAL NEWS STATIONS CONTACTING THEM OR COMING TO THEIR HOME
- SEVERAL ATTORNEYS CONTACTING THEM, SENDING HER FLOWERS
- CONTACT NEIL HYMAN
 - CONTACTED FOR CONSULTATION:
 - MEDIA
 - OTHER ATTORNEYS
 - "VERY UPSET ABOUT WHAT HAD HAPPENED"
 - NOT "ALL ABOUT MONEY"

CONFIRMATION BIAS

- DEFENSE'S THEORY
- MEDIA RELEASE:
 - NAME OF DEFENDANT
 - DESCRIPTION OF DEFENDANT
 - SEXUAL ASSAULT
 - DIDN'T SAY WHEN
- NEIL HYMAN - NEWS
 - DID INTERVIEW WITH THE NEWS AFTER PRELIMINARY HEARING, AFTER OTHER VICTIMS HAD COME FORWARD
- NOT ONE VICTIM SAW WHAT THE DEFENSE IS CLAIMING THEY SAW

MONEY

- SUED THE HOSPITAL, HOSPITAL SETTLED WITH HER FOR AN UNDISCLOSED AMOUNT
- YET STILL CAME IN AND TESTIFIED, WHAT MOTIVE DOES SHE HAVE NOW?
- HAS TO COME IN HERE:
 - TELL EVERYBODY WHAT HAPPENED
 - JURORS
 - NEWS
 - HAVE PICTURES OF HER VAGINA SPLASHED ACROSS THE SCREEN
 - HAVE HER CREDIBILITY CHALLENGED
 - ADMIT THAT SHE FELL APART, BAD WIFE, BAD MOM
 - ADMIT SHE BECAME AN ADDICT
 - ADMIT SHE HAD TO SEE A THERAPIST

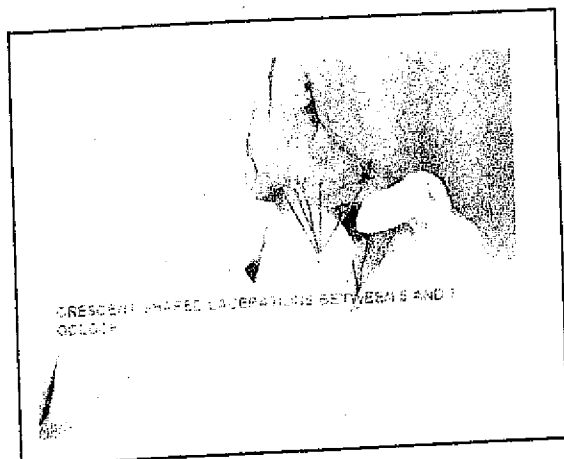
DOES IT MAKE SENSE

- DEFENSE POSITION THAT SHE LIED TO GET MONEY

COMMON SENSE INSTRUCTION

FOLLOW THE LOGIC

- IF THIS WERE PLANNED:
 - SHE WOULD HAVE TO TIME WHEN SHE WAS GOING TO HAVE A SEIZURE
 - INJURE HER OWN VAGINA OR HAVE SCOTT INJURE HER VAGINA RIGHT BEFORE THE SEIZURE HIT
 - KNOW THAT DIGITAL PENETRATION CAUSES CRESCENT SHAPED LACERATIONS
 - KNOW THAT IF YOU ARE DIGITALLY PENETRATED WHILE LAYING DOWN YOUR INJURIES WOULD BE IN THE 5 TO 7 O' CLOCK REGION
 - BANK ON THE FACT THAT SHE WAS GOING TO HAVE A MALE TREAT HER
 - BANK ON THE FACT THAT THE HOSPITAL WOULD ADMIT HER SO THAT PERSON COULD HAVE ACCESS TO HER



CRESCENT SHAPED LACERATION BETWEEN 5 AND 7 O'CLOCK

EBBERT'S OPINION

- IN CONSENSUAL SEX SITUATION, (NO "ROUGH SEX") WOULD NOT SEE THOSE TYPES OF INJURIES
 - NOT INJURIES CONSISTENT W/PENIS
- AFTER GETTING HISTORY OF ASSAULT:
 - EXPECT TO SEE CRESCENT SHAPED LACERATIONS
 - BETWEEN THE 5 AND 7 O'CLOCK POSITION
 - RECENT IN NATURE, BLUE TOI LUDINE DYE WOULD ADHERE
- VERY CLEAR SHE HADN'T HAD SEX IN THE PAST 5 DAYS

EFFECT ON ROXANNE

- TURNED TO PILLS AND ALCOHOL
- STARTED SLEEPING A LOT
- BECAME "DISCONNECTED" FROM HER HUSBAND AND DAUGHTER
- STOPPED HAVING SEX WITH HER HUSBAND
- STARTED SEEING A THERAPIST
- ALWAYS ON PHONE WITH GENE FROM RAPE CRISIS CENTER
 - PHONE RECORDS SHOW 20 CALLS JUST UP TO SEPTEMBER (366 AND 385)
 - JUST HER CELL RECORDS

SO FAR...

- HEATHER IS MISTAKEN
- TIM IS MISTAKEN
- ROXANNE IS LYING
- DET. CODY IS LYING
- DET. SAUNDERS IS LYING
- LINDA EBBERT IS LYING

LEDAHLIA SPURLOCK



LEDAHLIA SPURLOCK

- PICKS HIS VICTIMS FOR A REASON
- IN HOSPITAL BECAUSE OF SUICIDE
- WHO IS GOING TO BELIEVE SOMEONE WHO JUST ATTEMPTED TO TAKE THEIR LIFE AND IS ON THEIR WAY TO A MENTAL INSTITUTION
- HIS CONDUCT GOES AS FAR AS THE PATIENT'S STATUS WILL ALLOW
- NO EVIDENCE OF HEAVY MEDICATIONS



CONDUCT

- ALL THREE PEOPLE NOTICED IT WAS ODD/INAPPROPRIATE
 - THOUGHT ENOUGH OF IT TO HAVE A CONVERSATION ABOUT IT
 - MAKE SURE THEY ALL STAYED TOGETHER
- CAN ALL THREE PEOPLE BE WRONG ABOUT THE INCIDENT?
- MINOR INCONSISTENCIES:
 - MAIN POINT IS ALL THREE AGREE HE WAS DOING SOMETHING TO HER FEET AND IN THE AREA OF HIS GROIN

ALL THREE:

- LEDAHLIA: DEFENDANT GRABBED THE RAILS AND PUSHED HIS GROIN AGAINST HER FEET
 - VERY SLOW CIRCULAR, SIDE TO SIDE MOTION
 - SCARED TO REACT
- ERNESTINE: GRABBED HER FEET AND RUBBED THEM AGAINST HIS GROIN
- ADA: GRABBED HER FEET AND PULLED THEM TOWARDS HIS GROIN

REPORT

- FAILURE TO REPORT:
 - BIGGER STRUGGLES IN HER LIFE
 - COULDN'T BELIEVE THAT THIS WAS HAPPENING TO HER IN THE HOSPITAL
 - "ADDED INSULT TO INJURY"
 - DIDN'T KNOW IF PEOPLE WOULD BELIEVE HER DUE TO HER SITUATION
- CONTACTED BY FAMILY:
 - STILL HAD TO THINK ABOUT IT
 - KNEW SHE HAD TO REPORT TO "HELP OTHER PEOPLE"

MONEY

- NO CIVIL SUIT
- NEVER CONTACTED AN ATTORNEY
- HAS NOT RECEIVED A DIME

MEDIA

- DIDN'T SEE ANY OF THE MEDIA REPORTS
 - WAS TOLD BY HER MOTHER
 - MOTHER GAVE HER THE NUMBER
- CONFIRMATION BIAS:
 - DEFENSE THEORY
 - REALITY: THEY ALL DISCUSSED HOW WEIRD HIS BEHAVIOR WAS AT THE HOSPITAL BEFORE ANY NEWS

MAKE SENSE

- WHY GO THROUGH THIS???:
 - HAVE TO TALK ABOUT THE FACT THAT SHE TRIED TO KILL HERSELF
 - HAVE TO ADMIT SHE HAD TO GO TO A MENTAL INSTITUTION
 - GO TO COURT, TESTIFY AT PRELIMINARY HEARING
 - TESTIFY IN A PUBLIC TRIAL
 - STILL HERE SIX YEARS LATER

SO FAR...

- HEATHER SHANK IS MISTAKEN
- TIM LEHAN IS MISTAKEN
- ROXANNE CAGNINA IS LYING
- DETECTIVE CODY IS LYING
- DETECTIVE SAUNDERS IS LYING
- LINDA EBBERT IS LYING
- LED AHLIA SPURLOCK IS MISTAKEN
- ERNESTINE SMITH IS MISTAKEN
- ADA DOTSON IS MISTAKEN

DENISE HANNA



DENISE HANNA

- HAS HAD EKG'S BEFORE AND AFTER, OVER 12 IN NUMBER
- NO KNOWN ISSUE WITH LEADS DURING THAT STAY
- PICKS HIS VICTIMS, ONLY GOES AS FAR AS THEIR CONDITION WILL ALLOW
- NO EVIDENCE OF MEDICATIONS IMPACTING HER



DEFENDANT

- COMMON SENSE:
 - WHY ARE THERE SO MANY ISSUES WITH LEADS WHILE FARMER IS TREATING PEOPLE???
 - DON'T SEE ANY OTHER NURSES TALKING ABOUT THESE ISSUES
 - ARE LEADS AT CENTENNIAL HILLS JUST FAULTY???
 - WHY IS IT ALWAYS THE LEADS AROUND THE BREAST AREA???
 - TOUCHES HER BREAST (JUST LIKE HEATHER)
- THIS IS DEFENDANT'S M.O.

MARGARET WOLFE

- EVEN IF YOU DON'T WANT TO TAKE DENISE'S WORD FOR IT, WHAT ABOUT MARGARET'S?
- ABSOLUTELY NO PERSONAL ISSUES WITH FARMER
- CONDUCT WAS INAPPROPRIATE ENOUGH TO CONTACT HER SUPERVISOR, WARN THE OTHER NURSE COMING ON TO THE SHIFT
- INDEPENDENTLY CONTACTS THE DETECTIVE
 - RISK OF GETTING IN TROUBLE
 - RISK OF PASSING ALONG PATIENT'S INFORMATION
 - STILL DID ALL OF THIS BECAUSE SHE KNEW SHE SHOULD

NURSES' CONCERN

- CHRISTINE MURRAY:
 - STATEMENT TO POLICE: FOUND HIM TO BE OVERLY HELPFUL WITH FEMALE PATIENTS
 - ESPECIALLY IN THE AREA OF LEAD PLACEMENT
 - SAID THAT IN HER STATEMENT TO POLICE
- MARGARET WOLFE:
 - VERY OBVIOUS TO HER THAT DEFENDANT WAS MORE WILLING AND EAGER TO ASSIST WITH FEMALE PATIENTS OVER MALES

MEDIA, MONEY, MAKING SENSE

- MEDIA:
 - DIDN'T SEE ANYTHING ON THE MEDIA AT ALL
 - NO CONFIRMATION BIAS (DENISE OR MARGARET)
 - FIRST SHE HEARS OF IT IS THE DETECTIVE COMING TO HER
 - NEVER PROVIDES HER WITH ANY FACTS
 - IMMEDIATELY KNOWS WHY HE IS THERE
- MONEY:
 - NEVER CONTACTED A CIVIL ATTORNEY
 - HAS NOT RECEIVED A DIME

MAKE SENSE

- WHY MAKE THIS UP?
- NO MOTIVE
- EMBARRASSING
- DETECTIVE EVEN NOTED HER "FACE IMMEDIATELY WENT FLUSH" WHEN SPEAKING TO HER
- NOW SHE HAS TO COME AND SPEAK IN FRONT OF A JURY

SO FAR...

- HEATHER IS MISTAKEN
- TIM IS MISTAKEN
- ROXANNE IS LYING
- LEDAHLIA IS MISTAKEN
- ERNESTINE IS MISTAKEN
- ADA IS MISTAKEN
- DETECTIVE SAUNDERS IS LYING
- DETECTIVE CODY IS LYING
- LINDA HBBERT IS LYING
- DENISE LIANNA IS MISTAKEN
- MARGARET WOLFE IS MISTAKEN

MARCIA PETERSEN



MARCIA PETERSEN

- FELL IN EARLY 2008 AND HER WHOLE LIFE CHANGED
- LIFE WAS A LIVING HELL
- WENT FROM PERFECTLY FINE TO HAVING TO HAVE HER 26 YEAR OLD SON CARRY HER TO THE BATHROOM
- PICKS HIS VICTIMS WELL
- THEIR MEDICAL STATUS DICTATES HOW FAR HE CAN GO
- SEIZURE PATIENT, MEDS, VULNERABLE STATE
- EVEN MORE VULNERABLE THAN ROXANNE CAGNINA



DEFENDANT'S CONDUCT

- LEADS, YET AGAIN...
 - CONDUCT WENT FURTHER WITH MARCIA BECAUSE HE CAN GET AWAY WITH IT
 - WAKES UP TO FIND HIM PINCHING HER NIPPLES AND RUBBING HER BREASTS ON TWO OCCASIONS
- FECES???
- NEVER IN SIX YEARS DID MARSHAL EVER HAVE TO CHANGE HER BEDDING
- CATHETER:
 - DIFFERENCE BETWEEN WHERE A CATHETER GOES
 - WHERE THE VAGINAL OPENING IS
 - NOT EASILY CONFUSED

EFFECT ON MARCIA

- FIGHT HER CHILDREN IN GOING TO HOSPITALS
- WANTED TO STAY HOME AFTER SEIZURE
- REFUSED TO BE CARED FOR BY MALE NURSES OR DOCTORS, WOULD WAIT FOR FEMALE TO TREAT HER
- TOLD HER SONS NOT TO LET AMBULANCE TAKE HER TO CENTENNIAL HILLS
- MARSHAL COULD NOT LEAVE HER, HAD TO ACCOMPANY HER TO ALL HER APPOINTMENTS

DIDN'T REPORT

- SEIZURES ON AN ALMOST DAILY BASIS
- COMPLETE ROLE REVERSAL WITH CHILDREN
- IN AND OUT OF HOSPITAL SEVERAL TIMES BEFORE SHE EVEN SPOKE WITH DETECTIVE
- WHEN DETECTIVE INTERVIEWS HER SHE HAD JUST GOTTEN DONE WITH ANOTHER HOSPITAL STAY

MEDIA

- MARCIA DIDN'T SEE IT ON THE NEWS
- MARSHAL TOLD HER:
 - WENT UPSTAIRS TO HER ROOM
 - CAME BACK DOWN, SHE HAD BEEN CRYING
 - HE TOLD HER THAT SHE HAD TO TELL SOMEBODY
- CONFIRMATION BIAS:
 - TOLD HER SONS THAT THIS HAPPENED TO HER WHILE SHE WAS STILL IN THE HOSPITAL
 - LONG BEFORE SEEING ANYTHING ON THE NEWS

MONEY

- FILED CIVIL SUIT
- SIX YEARS LATER, STILL HASN'T SEEN A DIME
- IF SHE WAS DOING THIS FOR THE MONEY, WHY TAKE YOUR OWN LIFE BEFORE YOU EVER SEE A PENNY

MAKE SENSE???

- HER LIFE ON A DAILY BASIS
- STRESS OF A LAWSUIT???
- STRESS OF A CRIMINAL TRIAL???
- SEIZURE LEAVING THE GRAND JURY, YET STILL CAME BACK TO TESTIFY FOR THE VIDEO DEPOSITION

CREDIBILITY

- THE CREDIBILITY OR BELIEVABILITY OF A WITNESS SHOULD BE DETERMINED BY HER MANNER UPON THE STAND, HER RELATIONSHIP TO THE PARTIES, HER FEARS, MOTIVES, INTERESTS OR FEELINGS, HER OPPORTUNITY TO HAVE OBSERVED THE MATTER TO WHICH SHE TESTIFIED, THE REASONABleness OF HER STATEMENTS AND THE STRENGTH OR WEAKNESS OF HER RECOLLECTION

MARCIA PETERSEN



MARCIA'S WORDS

- I FELT PAIN. I FELT A MULTITUDE OF FEELINGS, ONE FEELING BEING THAT THERE WAS ABSOLUTELY NOTHING I COULD DO. I COULDN'T RING THE BELL, I COULDN'T SCREAM, I COULDN'T MOVE. I COULDN'T -- I JUST HAD TO LAY THERE. I WAS HUMILIATED, I WAS EMBARRASSED. I WAS SHOCKED THAT I'M IN A HOSPITAL BEING TAKEN CARE OF AND I'M HAVING THINGS LIKE THIS DONE TO ME AND AT THE POINT IN TIME I CAN'T TELL ANYBODY

DEFENDANT'S M.O.

- HEATHER, DENISE, MARCIA (DON'T KNOW EACH OTHER)
 - ALL HAVE ISSUES WITH THEIR LEADS
 - NONE OF THEM CAN TELL THEY ARE HAVING ISSUES
 - NO OTHER MEDICAL PERSONNEL CAN TELL THEY ARE HAVING ISSUES, JUST THE DEFENDANT
 - ALWAYS THE LEADS AROUND THEIR BREASTS, NEVER ANYWHERE ELSE
 - HE ALWAYS NEEDS TO TOUCH THEIR BREAST IN ORDER TO REPAIR THE SITUATION
- THIS IS WHAT HE DOES:
 - NOT ONE PIECE OF EVIDENCE THAT SOMETHING WAS EVER WRONG
 - HE USES THAT AS A GUISE TO DO WHAT HE WANTS

COMMON THEME MARCIA AND ROXANNE

- BOTH COME IN FOR SEIZURES
- BOTH HAVE SEIZURES WHILE IN HOSPITAL
- BOTH ON SAME TYPES OF MEDICATIONS
- MUCH MORE SERIOUS HEALTH CONCERNS THAN OTHER VICTIMS, ALLOWS HIM TO GO FURTHER
- ISOLATES THEM
- PENETRATES THEM
- COMES BACK TO SEE BOTH OF THEM IN THE MORNING
- THIS IS WHAT HE DOES:
 - PERFECT PLAN
 - UNTIL HE GOT TOO GREEDY
 - HE'S RUN OUT OF PASSES, EXCUSES, OUT OF COINCIDENCES

SO FAR...

- HEATHER SHANK IS MISTAKEN
- TIM LEHAN IS MISTAKEN
- ROXANNE CAGNINA IS LYING
- DETECTIVE CODY
- DETECTIVE SAUNDERS
- LINDA EBBERT
- LINDA LIA SPURLOCK IS MISTAKEN
- ERNESTINE SMITH IS MISTAKEN
- ADA DOTSON IS MISTAKEN
- DENISE HANNA IS MISTAKEN
- MARGARET WOLFE IS MISTAKEN
- MARCIA PETERSEN IS LYING/MISTAKEN

ACCOUNTABILITY





**ROSE
HEART INC.**
"Sexual Assault Nurse Examiner"

Case #
080516-1021

First Name: ROXANNE
MI:
Last Name: CAGNINA
DOB: 07/06/1973
Gender: Female
SSN: 524-02-3575

Patient Image #1:



Jurisdiction: LVMPD

C245739
MARKED FOR IDENTIFICATION
PROPOSED EXHIBIT

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STEVEN DALE FARMER,) No. 65935
)
 Appellant,)
)
 vi.)
)
 THE STATE OF NEVADA,)
)
 Respondent.)

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PHILIP J. KOHN
Clark County Public Defender
309 South Third Street
Las Vegas, Nevada 89155-2610

Attorney for Appellant

STEVE WOLFSON
Clark County District Attorney
200 Lewis Avenue, 3rd Floor
Las Vegas, Nevada 89155

ADAM LAXALT
Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717
(702) 687-3538

Counsel for Respondent

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I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 23rd day of Feb, 2015. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

CATHERINE CORTEZ MASTO
STEVEN S. OWENS

HOWARD S. BROOKS
DEBORAH WESTBROOK

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

STEVEN DALE FARMER
NDOC # 1121584
c/o ELY STATE PRISON
P.O. Box 1989
Ely, NV 89301

BY _____
Employee, Clark County Public Defender's Office

e, Clark County Public Defender's Office