COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
District Court - Oklahoma County, Oklahoma	Questioned Documents	57
U.S. Federal Court - Western District - Oklahoma	Questioned Documents	6
District Court - Cleveland County, Oklahoma	Questioned Documents	3
District Court - Logan County, Oklahoma	Questioned Documents	2
District Court - Muskogee County, Oklahoma	Questioned Documents	1
District Court - Dewey County, Oklahoma	Questioned Documents	1
District Court - Clark County, Nevada	Questioned Documents	15
Justice Court - Clark County, Nevada	Questioned Documents	2
Grand Jury - Clark County, Nevada	Questioned Documents	4
US Federal - Clark County, Nevada	Questioned Documents	5
Justice Court – Clark County, Nevada	Footwear Impressions	1
District Court – Clark County, Nevada	Footwear Impressions	3

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Questioned Document Examine Footwear Impression Examiner	08/97 - Present 02/07 - Present
Oklahoma County District Attorney Office - Oklahoma City, Oklahoma	Questioned Document Examiner	03/86 - 07/97
Oklahoma County District Attorney Office	White Collar Investigator	11/79 - 03/86
Ft. Smith Police Department	Patrol Officer	08/76 - 11/79

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
Diplomat - American Board of Forensic Document Examiners - ABFDE	06/93 - present

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
Fellow-American Academy of Forensic Sciences - Questioned Document Section	1990 - present
Active member-Southwest Association of Forensic Document Examiners-SWAFDE	05/87 - 04/00
American Standards and Testing Materials - ASTM	1994 - 1996
TWGDOC Subcommittee: Standardization for Procedures	02/98
Active member (moved from provisional member 8/00) of the American Society of Forensic Document Examiners (ASQDE)	1998 – present

PUBLICATIONS / PRESENTATIONS:
Significant Dates of Typing Methods - 62 page monograph published by ABFDE: released 1994
Facsimile Documents: Feasibility for Comparison Purposes, published in Journal of Forensic Sciences, November 1992, Vol. 37, No. 6, pp 1600 - 1609.
An Overview of Notary Public Laws and Practice, presented to SWAFDE in Oakland, California, 1989.
Facsimile Documents: Feasibility for Comparison Purposes, presented to the Questioned Document Section of the AAFS in Anaheim, California, 1991.
Significant Dates of Modern Typing Methods, presented to the Questioned Document Section of the AAFS in Boston, Massachusetts, 1993.
Comparison of the Kinderprint to the ESDA, presented to the Questioned Document Section of the AAFS in Boston, Massachusetts, 1993.
Photographic Techniques When Photographing Microfilm, presented to SWAFDE in Albuquerque, New Mexico, 1993.
Factors To Consider in the Examination of Patients Writing, presented to the Questioned Document Section of the AAFS in Seattle, Washington, 1995
Patterns of Distinction, presented at ASQDE on August 9, 1998
The Examination of Disguised Numbers, presented to AAFS Questioned Document Section in San Francisco, 1998

Curriculum Vitae

LARY A. SIMMS, D.O., M.P.H.

4548 SPECIAL COURT
LAS VEGAS, NEVADA 89130
Telephone: 702-658-3578
e-mail: MEDXMNR@aol.
Marital Status: Married (June Elizabeth Clee Simms)

PRESENT POSITION

Chief Medical Examiner
Clark County Coroner/Medical Examiner Office
1704 Pinto Lane
Las Vegas, Nevada 89106
702-455-3210
POSITION: Chief Medical Examiner

PREVIOUS WORK EXPERIENCE

Perry Memorial Hospital
Perry, Oklahoma
July 1979 to September 1981
POSITION: Private solo office and hospital practice in family medicine including obstetrics (approximately 75 deliveries); 2000 hours of Emergency Department coverage; total patient contacts for period: 6,000.

Rock County Hospital and Clinic
Bassett, Nebraska
September 1981 to July 1982
POSITION: Private solo office and hospital practice in family medicine and obstetrics (approximately 10 deliveries); 2500 hours of Emergency Department coverage; total patient contacts for period: 1,200.

Park Medical Centers
2255 Fort Street
Lincoln Park, Michigan 48146
313-385-7505
August 1982 to June 1986
POSITION: Member of 20+ physician group that renders primary care in the Detroit and suburban area; hospital privileges at 250 bed acute care hospital, total patient contacts for period: 30,000.

Taylor Physicians-Van Born Clinic, P.C.
21711 Van Born Road
Taylor, Michigan
313-562-6040
June 1986 to January 1987
POSITION: Member of four physician group that renders primary care in the suburban Detroit area and trains family practice residents at Botsford General Hospital; hospital privileges at a 250 bed acute care hospital and a 125 bed acute care hospital; total patient contacts for period: 4500.

Michigan Health Care Center – Park Medical Centers, Inc.
2255 Fort Street
Lincoln Park, Michigan 48146
313-385-7505
January 1987 to June 1989
POSITION: Member of 60+ physician group that renders primary care in the Detroit and suburban area; hospital privileges at 250 bed acute care hospital; total patient contacts for period: 18,000.

Blodgett Memorial Medical Center
1840 Wealthy, S.E.
East Grand Rapids, Michigan 49506
616-774-7722
July 1, 1991 to January 30, 1993
POSITION: Independent contractor for autopsy services for in-house autopsies and Kent County Medical Examiner autopsies; completed approximately one hundred thirty autopsies on a fee-for-service basis.

Cook County Office of the Medical Examiner
Stein Institute of Forensic Medicine
2121 West Harrison Street
Chicago, Illinois 60612-3705
312-666-0500
July 1, 1994 to August 15, 1998
POSITION: Deputy Medical Examiner performing approximately 500-600 medico-legal investigations per year and testify 10-15 times per year.

BOARD STATUS

Board Certified in Anatomic Pathology and Clinical Pathology in 1993 by the American Board of Pathology

Board Certified in Forensic Pathology in 1994 by the American Board of Pathology

LICENSES

Diplomate of the National Board of Osteopathic Medical Examiners (1979)
Active licenses in Illinois and Nevada
Inactive licenses in Nebraska, Michigan, Ohio and Oklahoma

EDUCATION

Oklahoma State University
Stillwater, Oklahoma
1970-71
Completed freshman year and transferred to University of Tulsa

University of Tulsa
Tulsa, Oklahoma
1971-74
MAJOR: Philosophy
G.P.A.: 3.34
DEGREE: Bachelor of Science (B.S.)

Oklahoma State University College of Osteopathic Medicine and Surgery
(formerly Oklahoma College of Osteopathic Medicine and Surgery)
1111 West 17th Street
Tulsa, Oklahoma
1974-78
DEGREE: Doctor of Osteopathy (D.O.)

Dallas Memorial Hospital (formerly Dallas Osteopathic Hospital)
5003 Ross Avenue
Dallas, Texas
One year rotating internship with elective time in anesthesiology
1978-79

Grand Rapids Medical Education Center/Michigan State University
200 Cherry Street
Grand Rapids, Michigan
Four year Anatomic and Clinical Pathology Residency
1989-1993

Office of the Medical Examiner of Cook County
Stein Institute of Forensic Medicine
2121 West Harrison Street
Chicago, Illinois 60612-3705
312-666-0500
Fellowship in Forensic Medicine
July 1, 1993 to June 30, 1994

University of Illinois at Chicago
Office of the Dean [MC 922]
School of Public Health
2121 West Taylor Street
Chicago, Illinois 60612-7260
312-966-3832
MAJOR: Health Policy Administration and Health Information Management
G.P.A.: 4.56 (5 point grading system)
DEGREE: Master of Public Health (M.P.H.)

ASSOCIATION MEMBERSHIPS

National Association of Medical Examiners

International Association of Coroners and Medical Examiners

PRESENTATIONS, LECTURES AND ACADEMIC CONTRIBUTIONS

Ectopic Thyroid Gland in Neck: Report of a Case (clinical staff presentation 1983)

Simultaneous Intrauterine and Extra-uterine Pregnancies: Report of a Case (clinical staff presentation 1984)

Heterozygous 21-OH Deficiency in the Father of a Neonate with Congenital Adrenal Hyperplasia: Report of a Case (clinical staff presentation 1985)

Hyperprolactinemia in an Ambulatory Clinic: Incidence, Diagnosis and Management (1985 unpublished manuscript)

Use of Plasmid Fingerprinting in the Diagnosis of Coagulase Negative Staphylococcal Septicemia (Grand Rapids Research Day presentation 1992)

Forensic Aspects of DNA (1993 Office of the Medical Examiner staff lecture series presentation)

Case Report: Lethal Morphine Doses Administered by Family Member in an Elderly Patient Admitted to a Nursing Home (1994 unpublished manuscript)

Forensic Sciences and the Medical Examiner (1994 Office of the Medical Examiner staff lecture series presentation)

Case Report: Sudden Death in A 60 Day Old Male Infant with Hypoplastic Right Coronary Artery (1995 unpublished manuscript)

Modern Death Investigation (Illinois Histology Society Annual Meeting presentation 1995)

Database Information System for Tracking Unknown Bodies in a Medical Examiner System (1996 Office of the Medical Examiner staff lecture series presentation)

Modern Death Investigation (University of Illinois at Chicago Criminal Justice Department presentation 1996)

Case Report: Sudden Death in a 6 Day Old Male Infant with Thymic Hypoplasia and Congenital Heart Disease (1996 unpublished manuscript)

Case Report: Sudden Death and Right Ventricular Cardiomyopathy in an Adolescent Male (1996 unpublished manuscript)

Medical Examiner Information Management System: Experience of a Practicing Forensic Pathologist (1996 unpublished manuscript)

Case Report: Sudden Death in a Neonate with Congenital Aneurysm of the Right Ventricle (in preparation)

Case Report: Sudden Death Due to Group A Streptococcal Necrotizing Fascitis in an HIV-Positive Adult (in preparation)

Modern Death Investigation (University of Illinois at Chicago Criminal Justice Department presentation 1997)

Modern Death Investigation (Midwestern University Faculty Guest Lecture Series presentation 1997)

Modern Death Investigation (Clinical Staff Cook County Department of Corrections and Cermack Hospital presentation 1997)

Suicide and Illinois Law (1997 Office of the Medical Examiner staff lecture series presentation)

Total Quality management in a Medical Examiner System (1997 Master of Public Health program)

Lymphoid Activation in Sudden Infant Death Syndrome: Histology of the Lymph Nodes and Spleen in SIDS Deaths in Chicago 1995-97 (grant application in preparation)

ACADEMIC APPOINTMENTS, AWARDS AND ACTIVITIES

Office of the Medical Examiner Liaison for the University of Illinois at Chicago Department of Criminal Justice (1996 to 1998)

Medical Consultant to the Industrial Commission of the Illinois State Attorney General's Office (1996 to 1998)

Grand Rapids Area Medical Education Council Research Foundation Award (1992) for Clinical Research of Bacterial Plasmids

Chief Resident, Grand Rapids Area Medical Education Center/Michigan State University Pathology Program (1991-1992)

Clinical Instructor, Michigan State University, Colleges of Human and Osteopathic Medicine (1990-1992)

Clinical Instructor to clinical clerks from the College of Osteopathic Medicine in Des Moines, Iowa (1985 to 1989)

Clinical Instructor to Family Practice Residents at Botsford General Hospital and Michigan Osteopathic Medical Center, Detroit, Michigan (1986-1989)

Advanced Trauma Life Support Certified, 1984

Advanced Cardiac Life Support Certified, 1983

Clinical Instructor to Emergency Medical Services, Rock County, Nebraska (1981)

Chief of Staff, Perry Memorial Hospital in Perry, Oklahoma (1980-81)

Chief Physician, Noble County Planned Parenthood Clinic (1980-81)

Clinical Instructor, Emergency Medical Services, Noble County, Oklahoma (1980)

Intern of the Year, Dallas Memorial Hospital, 1979
University of Tulsa President's Honor Roll (4.0 GPA) in 1973 and 1974

Published in the University of Tulsa Poetry Review for two consecutive years (1973-74)

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 07/26/10

Name: Randall D. Stone P#: 2887 Classification: Laboratory Manager

Current Discipline of Assignment: Manager – Comparative Analysis Detail

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances	X	Blood Alcohol	X
Toolmarks	X	Breath Alcohol	X
Trace Evidence		Arson Analysis	X
Toxicology	X	Firearms	X
Latent Prints		Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	X
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION			
Institution	*Dates Attended*	*Major*	Degree Completed
Metropolitan State College	8/79 - 5/84	Criminalistics	BS

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Ruger Factory Tour	Prescott, AZ	03/19/10
Civilian Supervisory Development	Las Vegas, NV	08/17-20/09
How to Supervise People	Las Vegas, NV	10/15/09
Civilian Supervisory Development Part II	Las Vegas, NV	10/28-29/09
Glock Armorer's Course	Las Vegas, NV	06/03/08
Remington 870 Shotgun Armorer's Course	Las Vegas, NV	05/05-05/06/08
SigSauer Armorer's Course-Semi-Auto Pistols	Las Vegas, NV	07/02-07/03/08
AFTE 39th Annual Training	Honolulu, HI	05/18-23/08
Springfield Armory XD Armorer's Course	Las Vegas, NV	01/31/08

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Barnes Bullets Factory Tour	American Fork, UT	11/07
North American Arms Factory Tour	Provo, UT	11/07
2nd Tri-Division Educational Conference / IAI / NWAFS	Salt Lake City, UT	11/07
Long Mountain Outfitters LLC-Suppressor History, Technology, & Testing Class	Henderson, NV	09/21/07
Innov-X Operators Training	Las Vegas, NV	08/07
AFTE Training Seminar	San Francisco, CA	05/07
NIBIN/IBIS Data Acquisition	Largo, FL	12/06
Long Mountain Outfitters LLC-AK47 Factory Certified	Henderson, NV	10/06
Long Mountain Outfitters LLC-M16 Class Certified	Henderson, NV	10/06
Colt Factory Tour	West Hartford, CT	5/06
U.S. Firearms Factory Tour	Hartford, CT	5/06
Lyman Factory Tour	Middletown, CT	5/06
Connecticut Shotgun Factory Tour	New Britain, CT	5/06
Charter Arms Factory Tour	Shelton, CT	5/06
Kahr Factory Tour	Gardner, MA	5/06
H&R Factory Tour	Gardner, MA	5/06
Wilson Arms Factory Tour	Branford, CT	5/06
Drill Master Factory Tour	Milford, CT	5/06
Savage Factory Tour	Westfield, MA	3/06
Smith & Wesson Factory Tour	Springfield, MA	3/06
Springfield Factory Tour	Springfield, MA	3/06
Mossberg Factory Tour	North Haven, CT	3/06
Marlin Factory Tour	North Haven, CT	3/06
Sigarms Factory Tour	Exeter, NH	3/06

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Ruger Factory Tour	Newport, NH	3/06
Remington Factory Tour	Lonoke, AR	2/06
ATF National Firearms Academy	Ammendale, MD	10/05-9/06
Firearms & Toolmarks Introduction II - CA Department of Justice	Sacramento, CA	1/06
Southern CA Firearms Study Group	San Bernardino, CA	10/05
Colt AR-15 / M16 Armorers School	Las Vegas, NV	8/05
Colt 1911 Armorers School	Las Vegas, NV	8/05
Symposium on Blood and Breath Alcohol Test Program Management and Administration	Bloomington, IN	10/04
Forensic Toxicology - Clark County Bar Association	Las Vegas, NV	4/04
Biological/Chemical Sample Collection	Las Vegas, NV	4/04
Radiological WMD Training	Las Vegas, NV	2/04
Audio / Video Enhanced Terrorism Training	Las Vegas, NV	1/04
Perkin-Elmer HS100 Training	Las Vegas, NV	1/04
Intoxilyzer 5000 User's Group Meeting	Overland Park, KS	8/03
Clandestine Laboratory Safety Re-Certification	Las Vegas, NV	7/03
Clandestine Laboratory Safety Re-certification	Las Vegas, NV	11/01
Digital Imaging Workshop	Las Vegas, NV	9/01
Intoxilyzer 5000 Users Group Meeting	Washington, DC	8/01
Intoxilyzer 5000EN Breath Alcohol Analysis - Operation, Maintenance and Repair	Owensboro, KY	5/01
Intoxilyzer 5000 Users Group Meeting	Breckenridge, CO	8/00
California Association of Toxicologists Alcohol Workshop and Quarterly Meeting	Berkeley, CA	8/00
Intoxilyzer 5000 Users Group Meeting	Harrisburg, PA	8/99

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
The Robert F. Borkenstein Course on Alcohol, Drugs and Highway Safety: Testing, Research and Litigation	Bloomington, IN	8/99
NV State Division for the International Association for Identification Conference	Las Vegas, NV	4/99
Intoxilyzer 5000 - Breath Alcohol Analysis Instrument Operation, Maintenance, & Repair	Owensboro, KY	6/98
International Association for Chemical Testing (IACT)	Las Vegas, NV	4/98
CAT/NWAFS/SWAFS/SAT Meeting	Las Vegas, NV	11/97
Clandestine Laboratory Safety Recertification Program	San Diego, CA	9/97
Soft Fall Meeting	Denver, CO	10/96
Clandestine Laboratory Investigating Chemists	Steamboat Springs, CO	9/95
Forensic Toxicology - Pharmacology	Orange County, CA	8/95
Drugs That Impair Driving	In-service training LVMPD	4/95
Clandestine Laboratory Recertification	In-service training LVMPD	3/95
Drug Recognition, Detection, and Evaluation	In-service training LVMPD	3/95
Soft Conference on Drug Testing in Hair	Tampa, FL	10/94
Forensic Toxicology Course - Armed Forces Institute of Pathology	Washington, D.C.	4/94
Hazardous Materials Awareness Level I	Las Vegas, NV	1/94
Hazmat Awareness Level I	In-service training LVMPD	1/94
Clandestine Laboratory Safety Recertification Program	Las Vegas, NV	9/93
Clandestine Laboratory Investigators Association 6th Annual Training Seminar	Las Vegas, NV	9/93
Clandestine Laboratory Investigators Association 5th Annual Training Seminar	Salt Lake City, UT	9/92

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Clandestine Laboratory Safety Recertification Program	Salt Lake City, UT	9/92
Laboratory Aspects of Forensic Urine Drug Testing	Salt Lake City, UT	3/92
Computer Basics, MS-DOS	In-service training LVMPD	10/90
Abuscreen "On Trak" Workshop	Las Vegas	8/90
Clandestine Laboratory Investigation/Safety Certification Program	Las Vegas	2/90
Chromatographic Methods in Forensic Science	FBI Academy	7/89
59970C Operator Training	Paramus, NJ	9/88
Macro Programming	Paramus, NJ	10/88
Fundamentals of GC/MS	Portland, OR	10/88
Instrumental Analysis of Explosives	FBI Academy	9/86
Forensic Chemist Seminar	McLean, VA	12/85
Internship - Aurora Police Dept. Forensic Lab	Aurora, CO	1/84 - 5/84
Armorers Course	Las Vegas, NV	06/03/08
Remington M/870 Police Armorer's Course	Las Vegas, NV	05/08
Innov-X Systems	Las Vegas, NV	08/21/07
Forensic Imaging Techniques	Las Vegas, NV	01/08

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Lincoln County District Court	Firearms	3
North Las Vegas Municipal Court	Blood Alcohol	>10

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Las Vegas Municipal Court	Blood Alcohol	> 50
Las Vegas Municipal Court	Breath Alcohol	45
Clark County Justice Court	Blood Alcohol/Toxicology/Controlled Substances/Clandestine Lab/Firearms	> 112
Clark County District Court	Blood Alcohol/Toxicology/Controlled Substances/Clandestine Lab/Firearms	> 40
Henderson Municipal Court	Blood Alcohol/Toxicology/Controlled Substances	> 11
Henderson Municipal Court	Breath Alcohol	22
Nye County Justice Court	Blood Alcohol/Breath Alcohol/Toxicology/Controlled Substances	> 16
Lincoln County Justice Court	Breath Alcohol	8
Federal Court	Blood Alcohol/Toxicology/Controlled Substances/Clandestine Labs/Firearms	> 12
Nye County District Court	Breath Alcohol/Blood Alcohol	7
Federal Court	Breath Alcohol	19

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
Boulder City Municipal Court	Breath Alcohol/Blood Alcohol	5
Mesquite Municipal Court	Breath Alcohol	9

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
LVMPD Forensic Lab	Forensic Scientist I/II	11/84 - present
United Parcel Service	Sorter/Loader	8/81 - 10/84

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
Northwest Association of Forensic Scientists	1985 - present
Clandestine Laboratory Investigating Chemists Association	1995 - 2006
Association of Firearms and Toolmark Examiners	2006 – present

PUBLICATIONS / PRESENTATIONS:

05/07 Hammer Forging of Rifle Barrels - Individuality of Barrels Forged from a Single Mandrel
2007 AFTE Training Seminar-San Francisco, CA

OTHER QUALIFICATIONS:

None

Curriculum Vitae

Las Vegas Criminalistics Bureau
Statement of Qualifications

Name: TAYLOR, Erinmarie P# 9619 Date: 03-26-13

CURRENT CLASSIFICATION

	Classification	*Minimum Qualifications*
	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

Institution	*Major*	*Degree/Date*
Baylor University	Intro. to Blood Spatter Interp.	24 Credit Hours
Public Agency Train. Council	Hostage Negotiation	35 Credit Hours
Baylor University	Forensic Science	B.S. - May 15, 2004

TESTIMONY

Yes	*No*	
X		District Court, Justice Court, Grand Jury
X		U.S. District Court

EMPLOYMENT HISTORY

Employer	*Title*	*Date*
LVMPD	Senior CSA	02-05-11 to Present
LVMPD	CSA II	10-23-08 to 02-05-11
LVMPD	CSA I	10-23-06 to 10-23-08

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/24/10

Name: Jennifer Thomas P#: 10074 Classification: Forensic Scientist II

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology	X	Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Quality Assurance		Technical Support /	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
UCSD	9/96 - 6/98	Molecular Biology	BS
UCLA	9/93 - 3/95		

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Forensic Y-STR Training	Huntington, WVA	04/19/10-04/23/10
ASCLD/LAB International ISO Preparation Course	Henderson, NV	12/01/09-12/03/09
20th International Symposium on Human Identification	Las Vegas, NV	10/12/09-10/15/09
GeneMapper ID-X Training, Advanced	Las Vegas, NV	07/29-07/31/09
GeneMapper ID-X Training, Basic	Las Vegas, NV	07/28/09

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Hair Analysis Training	Las Vegas, NV	12/29-12/31/2008
DNA Auditor Training	Hollywood, CA	10/12-10/13/08
19th International Symposium On Human Identification	Hollywood, CA	10/12 - 10/16/08
NFSTC Forensic Biology Screening Workshop	LVMPD	10/15/07 - 10/19/07
18th International Symposium on Human Identification	Los Angeles, CA	10/07
DNA Technology Expedition/Tour	Phoenix, AZ	6/03, 6/06
Future Trends in Forensic DNA Technology	Phoenix, AZ	12/01, 10/02, 8/03, 9/04, 3/06
13th -15th International Symposium on Human Identification	Phoenix, AZ	October 2002, 2003, 2004
Basic Bloodstain Pattern Identification hosted by MCSO	Phoenix, AZ	March 2004
Courtroom Testimony Skills Workshop	Phoenix, AZ	January 2003
Advanced 310 Genetic Analyzer Training	Foster City, CA	September 2001

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
Clark County Justice Court	Seology/DNA	1
Clark County District Court	Serology/DNA	4
Clark County Grand Jury	Serology/DNA	1

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metro PD Forensic Lab	Forensic Scientist II	5/07 - Present
AZ Dept of Public Safety	Criminalist II - DNA	4/01 - 5/07

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*

PUBLICATIONS / PRESENTATIONS:
None

OTHER QUALIFICATIONS:
None

Curriculum Vitae

Las Vegas Metropolitan Police Department: Criminalistics Bureau
Statement of Qualifications

Name: Kristina M. Thomas P# 13574 Date: 05/26/09

Current Classification:
- Crime Scene Analyst I (Hire Date: 09/02/08)

Formal Education:
- Elmira College — Elmira New York
  June 2004 — Bachelor of Science in Criminal Justice
- George Washington University — Washington, D.C.
  June 2006 — Master of Forensic Science-
  Crime Scene Investigation

Additional Classes and Training:
- Las Vegas Metropolitan Police Department Crime Scene Analyst Academy
  10 weeks Las Vegas Metropolitan Police Department
- Basic Bloodstain Pattern Analysis
  40 hours International Association of Bloodstain Pattern Analysts
  Elmira New York
- Crime Scene Technology 2: A Crime Scene Practicum
  40 hours Institute of Applied Forensic Technology
- Ethics in Forensic Science
  Continuing & Professional Education Certificate Program
  West Virginia University
- Bloodstain Pattern Analysis
  Continuing & Professional Education Certificate Program
  West Virginia University

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 07/01/10

Name: Beata Vida P#: 14279 Classification: Forensic Scientist II

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology	X	Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Footwear Impressions		Technical Support /	
Quality Assurance			

EDUCATION			
Institution	*Dates Attended*	*Major*	Degree Completed
University of Central Florida	01/2005-present	Anthropology	BA-in progress
Minnesota State University Moorhead	01/1997-05/2001	Biology	BA
Brevard Community College	08/2005-05/2005	Crime Scene Technology	AS

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
8th Annual Advanced DNA Technical Workshop by BODE Technology Group	Amelia Island, FL	05/19/09-05/20/09
FBI DNA Auditor 2-day Workshop	Amelia Island, FL	05/17/09-05/18/09
19th International Symposium on Human Identification by the Promega Corporation	Hollywood, CA	10/14/08-11/16/08
Forensic Population Genetics Workshop	Hollywood, CA	10/13/08

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Statewide Biology Discipline Meeting	Largo, FL	05/14/08-05/15/08
Florida Statewide DNA Conference	Largo, FL	05/12/08-05/13/08
3130 HID Class by Applied Biosystems	Orlando, FL	05/01/07-05/03/07
Serology/DNA Crime Laboratory Analyst Training Program	Orlando, FL	06/2006-06/2007
7000/7500 Sequence Detection Systems Training	Orlando, FL	10/19/06
Biomek 2000/3000 Training	Orlando, FL	09/25/06
GeneMapper ID Computer Software Training	Orlando, FL	09/2006

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
Orange, Brevard, Osceloa, Seminole and Vousia Counties, Florida	Serology/DNA	15

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist II	06/14/2010-present
Florida Department of Law Enforcement	Crime Laboratory Analyst	04/2006-05/28/2010
Florida Department of Law Enforcement	Forensic Technologist	12/31/05-04/2006

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
American Academy of Forensic Sciences	01/2006-present
International Association for Identification	06/2004-present

PUBLICATIONS / PRESENTATIONS:

University of Central Florida – Introductory Forensic Science Class presentation 03/24/2010

Detective Training presentation – DNA Training For New Detectives 10/2009

OTHER QUALIFICATIONS:

Electronically Filed
01/17/2014 04:33:53 PM

CLERK OF THE COURT

OPPS
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
DANIELLE PIEPER
Chief Deputy District Attorney
Nevada Bar # 8610
BARBARA SCHIFALACQUA
Chief Deputy District Attorney
Nevada Bar #10436
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW WASHINGTON,
#2685499
MARTELL MOTEN
#1999333

Defendants.

CASE NO: C-13-294695-1

DEPT NO: XI

THE STATE OF NEVADA'S OPPOSITION TO DEFENDANT WASHINGTON'S MOTION TO SEVER AND OPPOSITION TO DEFENDANT MOTEN'S MOTION TO SEVER AND JOINDER IN DEFENDANT WASHINGTON'S MOTION TO SEVER

DATE OF HEARING: 01/22/14
TIME OF HEARING: 9:00 AM

COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through DANIELLE PIEPER and BARBARA SCHIFALACQUA, Chief Deputy District Attorneys, and hereby submits the attached Points and Authorities in Opposition to Defendant's Washington's Motion to Sever and Opposition to Defendant Moten's Motion to Sever and Joinder in Defendant Washington's Motion to Sever.

//

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.

POINTS AND AUTHORITIES

STATEMENT OF THE CASE

On November 8, 2013, Matthew Washington and Martell Moten (hereinafter "Defendant Washington and Defendant Moten") were charged by way of Criminal Complaint with one (1) count of Conspiracy to Commit Murder, one (1) count of Murder with use of a Deadly Weapon, Victim 60 Years of Age or Older, three (3) counts of Attempt Murder with use of a Deadly Weapon, three (3) counts of Battery with Use of a Deadly Weapon, and six (6) counts of Discharging a Firearm at or Into a Structure. A preliminary hearing was set for November 22, 2013. On November 22, 2013, both Defendants requested a continuance of the preliminary hearing.

Additionally, the State of Nevada filed an Amended Criminal Complaint in open court charging Defendants with one (1) count of Conspiracy to Commit Murder with the Intent to Promote, Further or Assist a Criminal Gang, one (1) count of Murder with use of a Deadly Weapon, with the Intent to Promote, Further or Assist a Criminal Gang, three (3) counts of Attempt Murder with use of a Deadly Weapon, with the Intent to Promote, Further or Assist a Criminal Gang, two (2) counts of Battery with Use of a Deadly Weapon Resulting in Substantial Bodily Harm with the Intent to Promote, Further or Assist a Criminal Gang, and ten (10) counts of Discharging a Firearm at or Into a Structure with the Intent to Promote, Further or Assist a Criminal Gang and one (1) count of Possession of Firearm by Ex Felon. A preliminary hearing was set for December 5, 2013. On December 5, 2013, the State started its presentation of evidence. The Court continued the preliminary hearing until December 9, 2013. On December 9, 2013, the State finished its presentation of probable cause. Defendants were bound over to District Court on all charges without the gang enhancement and without substantial bodily injury to one of the counts.

On December 23, 2013, Defendants were arraigned in District Court by way of Information charging one (1) count of Conspiracy to Commit Murder, one (1) count of Murder with use of a Deadly Weapon, three (3) counts of Attempt Murder with use of a Deadly Weapon, one (1) count of Battery with Use of a Deadly Weapon Resulting in Substantial Bodily Harm, one (1) count of Battery with Use of a Deadly Weapon, ten (10) counts of Discharging a Firearm at or Into a Structure one (1) count of Possession of Firearm by Ex Felon. Both Defendants pled not guilty and invoked their right to a speedy trial. A jury trial is currently set for February 3, 2014. On January 13, 2014, Defendant Moten waived his right to a speedy trial. Both Defendants filed motions to sever. The State of Nevada opposes as follows.

THE STATEMENT OF THE FACTS

On November 5, 2013, just after 4:30 AM, approximately ten (10) shots were fired into the residence of 2655 Sherwood Street, Apt #18. The multiple shots left three (3) victims still breathing – Laroy Thomas, Marque Hill and Ashley Scott. Of the three (3), two (2) Laroy Thomas and Ashley Scott sustained gunshot wounds to their ankle areas. The fourth victim, Nathan Rawls, was killed by the gunshot wound that hit his chest. Rawls was found dead by the couch in the living room area. The apartment was riddled with bullet holes. On November 5, 2013, at approximately 4:30AM, Lorraine Desoto, was in the area of 2655 Sherwood Street and was awoken by gunfire. Desoto got up, got dressed, looked out the window and saw a vehicle. The vehicle was in an alley. The vehicle was a silver Dodge Magnum. The silver Dodge Magnum was driving west toward Van Patten. Desoto then called 911. Later that day police took Desoto to a location where she identified the silver Dodge Magnum as the vehicle she saw leave the alley.

On November 5, 2013, Officer Parquette was working as a Las Vegas Metropolitan Police officer during the graveyard shift. At approximately, 4:45AM he heard information over police dispatch about a shooting and the details of a vehicle that could be involved. The description of the vehicle was a dark or silver Dodge Magnum with tinted windows. Officer Parquette drove to the boarding area command. Officer Parquette observed a silver Dodge

Magnum with tinted windows and conducted a felony car stop on that vehicle. Two (2) males were in the vehicle. Defendant Washington was driving the vehicle and Defendant Moten was in the back seat of the vehicle. Both Defendants were taken into custody. The vehicle was cleared. The driver, Defendant Washington gave oral consent to search the vehicle. Officer Parquette and his partner walked to the back left door, which was open. Looking through the back passenger left side he saw a butt of a gun sticking out from the right passenger seat on the floor board. Officer Parquette then waited for homicide detectives to do further investigation.

Crime Scene Analyst Cromwell arrived on scene and recovered the firearm pursuant to a search warrant. The firearm was a 9mm Smith & Wesson semi –automatic. It was retrieved from under the front passenger seat. Later CSA Cromwell was called back out to retrieve an additional firearm that was located by Detective Rogers from the silver Dodge Magnum. The second firearm was found underneath the steering column. That firearm was a 40 caliber Glock 22.

On November 5, 2013, Detective Raetz went to the crime scene and observed bullet holes in apartment #18 of 2655 Sherwood Street. There were 13 separate cartridge cases – 9 located out in the courtyard itself. Six (6) were 9 millimeter cartridge casings and seven (7) 40 caliber cartridge casings.

Detectives interviewed Defendant Washington and Defendant Moten. Each Defendant denies that they were involved in shooting apartment #18. Each Defendant acknowledges that they were in the area of the crime and that a person known as "LG" or "LJ" had an issue with the victim Nathan Rawls. Each Defendant says that it is "LG" or "LJ" that goes to the complex with the other.

ARGUMENT

NRS 173.135 allows for two or more defendants to be charged under the same indictment or information if they participated in the same criminal conduct. Persons who have been jointly indicted should be tried jointly, absent compelling reasons to the contrary. Jones v. State, 111 Nev. 848, 853, 899 P.2d 544 (1995). NRS 174.165, however, provides

that "[i]f it appears that a defendant or the State of Nevada is prejudiced by a joinder of offenses or of defendants in an indictment or information . . . the court may . . . grant a severance of defendants or provide what other relief justice requires." In order to obtain a severance, a defendant must demonstrate that substantial prejudice would result from a joint trial.

The decision to sever is left to the discretion of the trial court and such decision will not be reversed absent an abuse of discretion. Amen v. State, 106 Nev. 749, 801 P.2d 1354 (1990). Broad allegations of prejudice are not enough to require a trial court to grant severance. United States v. Baker, 10 F.3d 1374, 1389 (9th Cir. 1993), cert. denied, 513 U.S. 934, 115 S. Ct. 330 (1994), overruled on other grounds by United States v. Nordby, 225 F.3d 1053 (9th Cir. 2000). Finally, even if prejudice is shown, the trial court is not required to sever; rather, it must grant relief tailored to alleviate the prejudice. See, e.g., Zafiro v. United States, 506 U.S. 534, 540-41, 113 S. Ct. 933, 939 (1993).

Within the federal system, and specifically the Ninth Circuit, the presumption is heavily in favor of joint trials. "[C]o-defendants jointly charged, are, prima facie, to be jointly tried." United States v. Gay, 567 F.2d 916, 919 (9th Cir.), cert. denied, 435 U.S. 999, 98 S. Ct. 1655 (1978); United States v. Silla, 555 F.2d 703, 707 (9th Cir. 1977) ("compelling circumstances" are generally necessary to show need for separate trials). The trial court has the broad discretion to join or sever trials and severance is not required unless a joint trial would be manifestly prejudicial. See Gay, 567 F.2d at 919. Federal appellate courts review a denial of a motion to sever for abuse of discretion and "[t]o satisfy this heavy burden, an appellant must show that the joint trial was so prejudicial as to require the exercise of the district judge's discretion in only one way: by ordering a separate trial." United States v. Ford, 632 F.2d 1354, 1373 (9th Cir. 1980), cert. denied, 450 U.S. 934, 101 S. Ct. 1399 (1981), overruled on other grounds by United States v. DeBright, 730 F.2d 1255 (9th Cir. 1984).

//

//

In both the state and federal system, the general rule favoring joinder has evolved for a specific reason—there is a substantial public interest in joint trials of persons charged together because of judicial economy. Jones, 111 Nev. at 854, 899 P.2d at 547. Joint trials of persons charged with committing the same offense expedites the administration of justice, relieves trial docket congestion, conserves judicial time, lessens the burden on citizens called to sacrifice time and money while serving as jurors, and avoids the necessity of calling witnesses more than one time. Id. at 853-54, 899 P.2d at 547, see also United States v. Brady, 579 F.2d 1121 (9th Cir. 1978), cert. denied, 439 U.S. 1074, 99 S. Ct. 849 (1979). Therefore, the legal presumption is in favor of a joint trial among co-defendants.

Severance is NOT Required based on Bruton Concerns.

Defendants cite to Bruton v. United States, 391 U.S. 123, 88 S.Ct. 1620 (1968), in an effort to persuade this Court to sever the trial. This argument, however, is not persuasive and the Defendants' motion should be denied. In fact, the United States Supreme Court and Nevada case-law provide that if a statement is redacted to exclude defendant's existence and the statement is not incriminating on its face but only when linked with other evidence introduced later at trial, then a limiting instruction will cure any prejudice. See Ducksworth v. State, 114 Nev. 951 (1998); Lisle v. State, 113 Nev. 679, 941 P.2d 459 (1997) (overruled on other grounds); Stevens v. State, 97 Nev. 443 (1981); see also Richardson v. Marsh, 481 U.S. 200, 107 S.Ct. 1702 (1987).

In fact, redaction is not per se barred. Specifically, in People v. Fletcher, 13 Cal.4th 451, 917 P.2d 187 (1996), the holding states the following:

> We hold, therefore, that editing a non testifying codefendant's extrajudicial statement to substitute pronouns or similar neutral terms for the defendant's name will not invariably be sufficient to avoid violation of the defendant's Sixth Amendment confrontation rights. Rather, the sufficiency of this form of editing must be determined on a case-by-case basis in light of the statement as a whole and the other evidence presented at the trial. Fletcher, at 582, 197.

Additionally, in State v. Tucker, 10 Haw.App. 43, 861 P.2d 24 (1993), the court stated the following, "We believe that this case-by-case approach best protects the Confrontation Clause rights of a defendant in situations where redaction is used to edit an otherwise inadmissible out-of-court statement." Tucker, at 66 and 35. Consequently, the case does not stand for a bar of editing, rather it stands for a case by case review of the editing. As such, parties should propose an edited version of Defendants statements and the parties and this Court can make a determination based on the facts of this case as to what would be permissible rather than just granting severance because the cases do not mandate it, per se.

Antagonistic Defenses do NOT require Severance.

Defendants are not entitled to severance based on their anticipated antagonistic defense or anticipated mutually exclusive defenses. In fact, each defendant blaming the other does not mandate severance. Each Defendant suggests they will seek to blame each other and a third co-conspirator for the victim's death. First and foremost, it should be pointed out that Defendants asserted defenses are not, by definition, "mutually exclusive" or irreconcilable. Simply put, a vague implication that each intends to blame the other for the victim's death and vice versa does not reveal the "core" of either defendant's defense. See United States v. Tootick, 952 F.2d 1078, 1081 (9th Cir. 1991).

Defendants do not provide specific details regarding their position; for instance, how they intend to actually defend the case through witnesses and evidence. Their vague references are inadequate to allow the Court to predict whether a jury would be precluded from acquitting each at a joint trial, which is a factor to be considered for severance. See Rowland v. State, 118 Nev. 31, 45, 39 P.2d 114, 123 (2002).

Severance is not warranted or justified simply because each defendant seeks to blame the other for the crime. Marshall v. State, 118 Nev. 642, 56 P.3d 376 (2002). In Marshall, co-defendants Marshall and Currington were tried and convicted together of first degree murder, robbery, and conspiracy to commit robbery. At trial, Marshall's strategy was to

exclusively blame Currington; Currington's strategy was to blame Marshall. Id. at 644-45, 56 P.3d at 377-78.

On appeal, Marshall claimed that the district court erred in not severing his trial from Currington's. Id. at 645, 56 P.3d at 378. He maintained that he and Currington had "antagonistic defenses" in that each argued that the other was responsible for the murder. Id., 56 P.3d at 378. Marshall relied on the standard the Nevada Supreme Court articulated in Rowland v. State, 118 Nev. 31, 39 P.3d 114 (2002).

In Rowland, the Nevada Supreme Court stated that "defenses must be antagonistic to the point that they are 'mutually exclusive' before they are to be considered prejudicial" and necessitate severance. Id. at 45, 39 P.3d at 122. The court further noted in Rowland that defenses are mutually exclusive when the core of the co-defendant's defense is so irreconcilable with the core of the defendant's own defense that the acceptance of the co-defendant's theory by the jury precludes acquittal of the defendant. Id. at 45, 39 P.3d at 123. In Marshall, the Nevada Supreme Court expressed concern that the Rowland decision implied severance was justified in too broad of circumstances. The court explained the Rowland holding and limited the standard under which severance is appropriate. It stated:

> To the extent that this language suggests that prejudice requiring severance is presumed whenever acceptance of one defendant's defense theory logically compels rejection of another defendant's theory, it is too broadly stated. As we have explained elsewhere, where there are situations in which inconsistent defenses may support a motion for severance, *the doctrine is a very limited one*. A defendant seeking severance must show that the codefendants have conflicting and irreconcilable defenses and that there is a danger that the jury will unjustifiably infer that this conflict alone demonstrates that both are guilty. We take this opportunity to further clarify this issue. Marshall, 118 Nev. at 646, 56 P.3d at 378 (Emphasis added).

The Court then explained the standard for severance.

> The decisive factor in any severance analysis remains prejudice to the defendant. NRS 174.165(1) provides in relevant part: 'If it appears that a defendant ... is prejudiced by a joinder ... of defendants ... for trial together, the court may order an election or separate trials of counts, grant a severance of defendants or provide whatever other relief justice requires.' Nevertheless,

prejudice to the defendant is not the only relevant factor: **a court must consider not only the possible prejudice to the defendant but also the possible prejudice to the State resulting from expensive, duplicative trials.** Joinder promotes judicial economy and efficiency as well as consistent verdicts and is preferred as long as it does not compromise a defendant's right to a fair trial. Despite the concern for efficiency and consistency, the district court has a continuing duty at all stages of the trial to grant a severance if prejudice does appear. Joinder of defendants is within the discretion of the district court, and its decision will not be reversed absent an abuse of discretion. To establish that joinder was prejudicial requires more than simply showing that severance made acquittal more likely; misjoinder requires reversal only if it has a substantial and injurious effect on the verdict. Marshall v. State, 118 Nev. at 646-647 (emphasis added) (citations omitted).

Significantly, the Nevada Supreme Court specifically held that antagonistic defenses are a factor, but not, in themselves, sufficient grounds upon which to grant severance of defendants. Indeed, in Marshall, even though the defenses offered by Marshall and co-defendant Currington were antagonistic and each one accused the other, the Nevada Supreme Court held that the joinder of the defendants at trial was proper. Id. at 648, 56 P.3d at 378. Finding Marshall's assertion that his and Currington's defenses were prejudicial by virtue of their antagonistic nature unpersuasive, the court explained that to prevail on the ground that severance was warranted, Marshall had to show that the "joint trial compromised a specific trial right or prevented the jury from making a reliable judgment about guilt or innocence." Id. at 648, 56 P.3d at 380. The court also noted that the State's case was not dependent on either defendant's statement and did not use joinder to unfairly bolster a marginal case. Id., 56 P.3d at 380. Moreover, the State argued both defendants were guilty and presented evidence to establish their separate guilt. Id., 56 P.3d at 380. The court affirmed Marshall's conviction.

//

The United States Supreme Court conducted a similar analysis in Zafiro v. United States, 506 U.S. 534, 113 S. Ct. 933 (1993). In that case, petitioners contended that a joint trial was prejudicial whenever two defendants each claim innocence and accuse the other of the crime. Id. at 538, 113 S. Ct at 938. The United States Supreme Court rejected this contention, holding that "mutually antagonistic defenses are not prejudicial per se." Id., 113 S. Ct. at 938. The Court explained that severance should only be granted if there is a serious risk that a joint trial would compromise a specific trial right of one of the defendants or prevent the jury from making a reliable judgment about guilt or innocence. Id. at 539, 113 S. Ct. at 938. It is not prejudicial for a co-defendant to introduce relevant, competent evidence that would be admissible against defendant at a severed trial. Id. at 540, 113 S. Ct. at 938. The Court also noted that the trial court can cure any potential of prejudice by properly instructing the jury that it must consider the case against each defendant separately. See Id. at 540-41, 113 S. Ct. at 939.

In the instant case, both defendants have made incriminating statements. They are also both linked to the crime by their actions which are separate and distinct evidence from their statements. They are both stopped by police in a vehicle that was seen fleeing the location of the crime. Police found two (2) firearms in the vehicle and the caliber of those firearms match the caliber of the cartridge casings left at the crime. It is certainly possible that each defendant will opt to defend by accusing their co-defendant of being the person who actually inflicted the injuries to the victim. Under Marshall, this is an insufficient basis upon which to grant a severance in the case. Defendants cannot point to a particular right or prejudice he would suffer as a result of joinder—which is required for the Court to grant severance.

The severance standards of the Ninth Circuit and Nevada emphasize that severance is required only when the jury will be prevented from making a reliable judgment about guilt or innocence in a joint trial. In Nevada, a defendant seeking severance must not only show the existence of an irreconcilable defense, but also that "the jury will unjustifiably infer that this conflict alone demonstrates that both are guilty." Marshall, 118 Nev. at 646, 56 P.3d at

378. For all of the conjecture about prejudice from a joint trial, Defendants have failed to raise a point that would elevate any inconsistency in their statements to the level in a jury's evaluation of the evidence.

The decision in United States v. Mayfield, 189 F.3d 895 (9th Cir. 1999) reinforces the ability of the court to mitigate any risks of prejudice in a joint trial. Id, 189 F.3d 895 (9th Cir. 1999). In Mayfield, defendants Mayfield and Gilbert were jointly tried for possession with intent to distribute cocaine. On appeal, the Ninth Circuit reversed Mayfield's conviction. Significantly, the reviewing court did not hold that reversal was necessary simply because the defendants had antagonistic defenses. Rather, the circuit count concluded that reversal was necessary because the trial court failed to protect Mayfield's rights when it gave Gilbert's counsel "free rein to introduce evidence against Mayfield" and act as a second prosecutor and did not remedy the trial tactics of Gilbert's attorney by severance "or some alternative means of mitigating the substantial risk of prejudice." Id. at 897.

In examining the trial record, the Ninth Circuit in Mayfield never held that severance was mandatory. Instead, the court noted accumulated errors in the record which prejudiced Mayfield. The court explained that prior to trial, defense counsel for Gilbert informed the court that her strategy would be to blame Mayfield for the crime "which should have put the district court on notice that it was required to grant Mayfield's severance motions or employ other means of stemming the prejudice flowing from Gilbert's mutually exclusive defense." Id. at 900 n.1; see also id. at 901 ("we have no doubt that the combination of the informant's statements, the admission of Gilbert's out-of-court confession . . . and Gilbert's counsel's inflammatory closing argument warranted severance"); Id. at 906 ("the district court abused its discretion by failing to sever or use more rigorous and timely jury instructions to mitigate the prejudice").

The circuit court examined three specific instances in the trial record where the trial court failed to employ measures to protect the rights of Mayfield in the joint trial. First, Gilbert's statement to police officers was introduced by the State at trial, with references to

Mayfield redacted. However, on cross-examination the court permitted Gilbert's attorney to ask questions which indicated to the jury that Mayfield was mentioned in the statement. The reviewing court found fault in the trial court's failure to give a contemporaneous limiting instruction telling the jury only to consider the statement as to Gilbert. Id. at 898. Second, although prior to trial the parties had agreed not to mention the basis of a search warrant underlying the case in which a confidential informant implicated only Mayfield in the crime, the trial court permitted Gilbert's attorney to question the police officer regarding the affidavit for the warrant. The trial court gave the jury a limiting instruction that the testimony could only be considered as it related to the officer's state of mind. Id. at 901.

The Ninth Circuit explained that the trial court should have not permitted questioning about the warrant because the validity of the warrant and its timing were not issues in the case. Id. In addition, the Circuit explained that the trial court should have struck the testimony rather than admit it for no apparent purpose as the officer's state of mind was not at issue either. Id. The Ninth Circuit also explained that in referencing the basis for the warrant in her closing argument, Gilbert's attorney based her closing argument on evidence that should not have been admitted at trial. Therefore, the district court "should have sternly admonished the jury after Gilbert's inflammatory closing argument." Id. at 905. Indeed, the trial court had a "duty to police the tactics" of Gilbert's attorney, but failed to do so according to the Ninth Circuit. Id. Thus, the circuit court never concluded that severance was mandatory. Instead, it held that in the case of a joint trial, the trial court must take an active role in protecting the record and rights of each defendant.

Chartier v. State, 124 Nev. 760, 191 P.3d 1182 (2008), cited to by the defense, does not change this analysis. In that case, the Nevada Supreme Court held that the cumulative effect of the joint trial was not harmless because it had an injurious effect on the verdict as demonstrated by the conflicting and irreconcilable defenses in the case. Id, 191 P.3d at 1186. The reversal was not based simply on the fact that the defendants blamed each other for the crime. The Chartier case did not overturn the Court's decision in Marshall. 191 P.3d at 1186. Rather, the Court distinguished Chartier from Marshall by highlighting how

defendant Chartier was hindered in his ability to present his defense based on the joint trial. Id. at 1187.

Specifically, for example, the Court found that defendant Chartier was precluded from introducing into evidence his co-defendant's incriminatory wire-tapped conversations which prevented Chartier from presenting critical evidence to the jury as part of his theory of defense. Id. at 1187. Chartier would have been able to introduce evidence of Wilcox's wiretapped incriminating statements had the trials been severed. Id. The Court concluded that the jury was precluded from making a reliable judgment about Chartier's guilt or innocence because of Chartier's inability to present his full theory of the defense. Id.

Here, on the other hand, Defendants have not made a showing that they will be precluded from presenting their theory of defense. In sum, there is no per se rule mandating severance whenever mutually exclusive defenses are pled. See United States v. Tootick, 952 F.2d 1978, 1081 (9th Cir. 1991). Rather the trial court is charged with putting in place safeguards which will prevent the jury from being unable to assess the guilt or innocence of each defendant on an individual and independent basis. Id. at 1082.

CONCLUSION

Based on the foregoing, the State of Nevada respectfully requests that this Honorable Court DENY Defendant Washington and Defendant Motens motion to sever trial.

DATED this 17th day of January, 2014.

Respectfully submitted,

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

BY /s//BARBARA SCHIFALACQUA
BARBARA SCHIFALACQUA
Chief Deputy District Attorney
Nevada Bar #10436

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that service of State's Notice, was made this 17th day of January, 2014, by Electronic Filing to:

DAVID J. OTTO, ESQ.
E-mail Address: davidottolaw@yahoo.com

Shellie Warner
Secretary for the District Attorney's Office

mmw/GANG

P:\WPDOCS\OPP\FOPP\318\31802001-1.DOCX

Electronically Filed
01/21/2014 09:30:59 AM

CLERK OF THE COURT

NOTC
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW WASHINGTON,
#2685499

Defendant.

CASE NO: C-13-294695-1

DEPT NO: VI

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

TO: MATTHEW WASHINGTON, Defendant; and

TO: DAVID J. OTTO, ESQ., Counsel of Record:

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:

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

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

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

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

***Indicates an additional witness**

NAME ADDRESS

ADAMS, TIFFANY - LVMPD P#10072 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

AOYAMA, KATHRYN – LVMPD P#8025 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*ARCINIEGA, D. - LVMPD P#14185

BAS, JENNIFER – LVMPD P#9944 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

BEAUDETTE, FRAN – LVMPD P#4361 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

BENINCASA, FLOCERFIDA – LVMPD P#10170 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

*BRANDON, J. - LMVPD 9631

*BRISENDINE, D. - LVMPD P#14003

*BUNTING, C. - LVMPD P#6484

CAMERON, CATHRYN – LVMPD P#9887 (or designee): LATENT PRINT EXAMINER I - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

CARTER, MARNIE – LVMPD P#8179 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*CHARLTON, N. - LVMPD P#13572

*COPLEY, B. - LVMPD P#14462

CROMWELL, MICHAEL – LVMPD P#13203 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER

CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS – LVMPD RECORDS

*DARBOWSKI, J. - C/O CCDA, 200 LEWIS AVE., LVN 89101

*DARR, A. - LVMPD P#5485

DESOTO, DARRIN – 2635 SHERWOOD ST., #18, LVN 89109

*DOBLE, N. - LVMPD P#8298

*DONOVAN, M. - LVMPD P#13241

*DREDLA, M. - LVMPD P#8049

*FIGUORA, J. - C/O SUNRISE HOSPITAL

FINK, JAMES – LVMPD P#4780

*FORNI, GARRETT - LVMPD P#14080

FRIED, JONATHAN – LVMPD P#8174 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

GAUTHIER, KELLIE – LVMPD P#8691 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

*GOLLMER, J. - LVMPD P#13429

GOULDTHORPE, HEATHER – LVMPD P#8646 (or designee): LATENT PRINT EXAMINER I - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*GRAMMAS, KRISTIN K. - LVMPD P#7808 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is

expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

GUENTHER, EDWARD – LVMPD P#5891 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

HAINES, LORI – LVMPD P#9931 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

HILL, MARQUE – 2655 SHERWOOD ST., #18, LVN 89109

HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR

*HUFF, C. - LVMPD P#8888

JOHNSON, DAVID – LVMPD P#9933 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*KELVINGTON, A. - LVMPD P#8878

KING, CRAIG – LVMPD P#9971 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

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

LESTER, ANYA "SANKO" – LVMPD P#13771 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

*LIVELY, JAMES - C/O CCDA, 200 LEWIS AVE., LVN 89101

*LYNCH, M. - LVMPD P#8284

LYNCH, SHANDRA – LVMPD P#13206 (or designee): CRIME SCENE ANALYST II: Expert in the identification, documentation, collection and preservation of evidence and is

expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MACEO, ALICE – LVMPD P#7828 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

MARSCHNER, JULIE – LVMPD P#8806 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected

MARTIN, TERRY – LVMPD P#5946 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MAY, CRYSTAL – LVMPD P#9288 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

MCCARTHY, JASON – LVMPD P#4715

MCGHEE, EBONY – LVMPD P# 5158 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

*MCGUIRE, J. - LVMPD P#14067

MCINTYRE, MORETTA – LVMPD P#13207 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MOSES, D. ANGEL – LVMPD P#8002 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

//

MURGA, KIM – LVMPD P#10140 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

*NARVARRO, B. - LVMPD P#12616

NEMICK, AMY - LVMPD P#8504 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

*OSTROVSKY, S. - LVMPD P#13902

PAIQUETTE, C. – LVMPD P#13937

RAETZ, DEAN – LVMPD P#4234

RETAMOZO, CAROL – LVMPD P#14280 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

REVELS, JEROME – DISTRICT ATTORNEY INVESTIGATOR

ROGERS, R. – LVMPD P#2858

SAHOTA, ERIC – LVMPD P#9932 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

SCOTT, ASHLEY – 2645 SHERWOOD ST., #11, LVN 89109

SEAMAN-KELLY, JAN – LVMPD P#5666 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

SHELL, ELIZABETH – 1918 PINEDALE AVE., MEMPHIS, TN 38127

SIMS, DR. LARY - A medical doctor, employed by the Clark County Coroner's Office as the Chief Medical Examiner/Forensic Pathologist. He is an expert in the area of forensic pathology and will give scientific opinions related thereto. He is expected to testify regarding the cause and manner of death of NATHAN RAWLS.

*SMINK, JEFF – LVMPD P#6556 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

*SOKOLOWSKI, E. - LVMPD P#14190

STONE, RANDALL - LVMPD P#2887 (or designee): FORENSIC LAB MANAGER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

TAYLOR, ERINMARIE - LVMPD P#9619 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

THOMAS, JENNIFER – LVMPD P#10074 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

THOMAS, KRISTINA – LVMPD P#13574 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

THOMAS, LAROY – 2655 SHERWOOD ST., #18, LVN 89109

to testify thereto.

VIDA, BEATA – LVMPD P#14279 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

//

//

//

//

WATTS, JOE – DISTRICT ATTORNEY INVESTIGATOR

*WEBER, D. - LVMPD P#14457

STEVEN B. WOLFSON
District Attorney
Nevada Bar #001565

BY /s//DANIELLE K. PIEPER
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that service of State's Notice, was made this 6th day of January, 2014, by Electronic Filing to:

DAVID J. OTTO, ESQ.
E-mail Address: davidottolaw@yahoo.com

Shellie Warner
Secretary for the District Attorney's Office

mmw/GANG

LAS VEGAS CRIMINALISTICS BUREAU
STATEMENT OF QUALIFICATIONS

Name: **Kristin K. Grammas** P# **7808** Date: **8/14/03**

CURRENT CLASSIFICATION

	CLASSIFICATION	*MINIMUM QUALIFICATIONS*
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	2 years as a Crime Scene Analyst II to qualify for the promotional test for Senior Crime Scene Analyst
	Crime Scene Analyst Supervisor	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

Institution	*Major*	*Degree/Date*
CCSN and UNLV	Major Course Work in Criminal Justice and Anthropology	

ADDITIONAL TRAINING/SEMINARS

Course / Seminar	*Hours*	*Date*
Basic Forensic Science / American Institute of Applied Science (AIAS)	260	8/15/01
Nevada State Division of the International Association for Identification (Member # 00208) / NSDIAI		9/30/02
New Civilian Employee Orientation / LVMPD	42	10/15/02
Completion of Training – Collection of Samples from Biological Fluids/Stains / Criminalistics Bureau – LVMPD		11/06/02
Completion of Proficiency Exercise – Presumptive Semen/Acid Phosphatase Test / Criminalistics Bureau – LVMPD		11/06/02
Crime Scene Analyst Academy / Criminalistics Bureau – LVMPD	160	10/14 to 11/7/02
Field Training Evaluation Program (FTEP) – Satisfactorily Completed / LVMPD		11/12/02 to 2/19/03
Major Case Prints / LVMPD	4	4/02/03

EMPLOYMENT HISTORY

Employer	*Title*	*Date*
LVMPD – Criminalistics Bureau/Field	CSA I	08/12/02

Curriculum Vitae

JEFFREY SMINK

Name:SMINK, Jeffery P# 6556 Date: 06-05-00

CURRENT CLASSIFICATION

	Classification	Minimum Qualifications
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	EIGHTEEN (18) MONTHS - TWO (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

Institution	Major	Degree/Date
Crafton Hills College	Fire Investigation/Criminal Justice	N/A
Riverside City College	Physics/General Education	N/A

TESTIMONY

Yes	No	
X		San Bernardino County, CA - Juvenile, Municipal, Superior
X		LA County, CA - Superior, Federal Court, Los Angeles, CA

EMPLOYMENT HISTORY

Employer	Title	Date
San Bernardino County Sheriff - Scientific Invest. Division	Forensic Specialist II	12-
San Bernardino County Sheriff - Identification Division	Evidence Clerk	06-86/11-

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
International Association for Identification - California and Nevada State Divisions	1998
Association of Crime Reconstruction	1998
International Association for Identification - National	2000

A:\ST4D0F~1.WPD

Electronically Filed
01/27/2014 09:24:24 AM

CLERK OF THE COURT

NOTC
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW WASHINGTON,
#2685499

Defendant.

CASE NO: C-13-294695-1

DEPT NO: XI

SECOND SUPPLEMENTAL NOTICE OF WITNESSES AND/OR EXPERT WITNESSES [NRS 174.234]

TO: MATTHEW WASHINGTON, Defendant; and

TO: DAVID J. OTTO, ESQ., Counsel of Record:

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:

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

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

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

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

***Indicates an additional witness**

NAME ADDRESS

ADAMS, TIFFANY - LVMPD P#10072 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

AOYAMA, KATHRYN – LVMPD P#8025 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*ARCHER, ANTHONY – LVMPD P#6403

ARCINIEGA, D. - LVMPD P#14185

BAS, JENNIFER – LVMPD P#9944 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

BEAUDETTE, FRAN – LVMPD P#4361 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

*BECHLER, MICHAEL - LVMPD P#4701

*BECK, K. - LVMPD P#9629

*BELL, L. - LVMPD P#13591

*BELLO, GERARD - LVMPD P#6793

BENINCASA, FLOCERFIDA – LVMPD P#10170 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

*BIDDLE, DAWN – 9540 AMBER VALLEY, LVN 89134

*BLOUNT, DANIEL - LVMPD P#8287

BRANDON, J. - LMVPD 9631

BRISENDINE, D. - LVMPD P#14003

BUNTING, C. - LVMPD P#6484

*BUTLER, WENDY - LVMPD P#8720

CAMERON, CATHRYN – LVMPD P#9887 (or designee): LATENT PRINT EXAMINER I - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*CAMPBELL, T. – KOHL'S – 4250 BLUE DIAMOND, LVN

*CAMPBELL, T. – LVMPD P#13402

CARTER, MARNIE – LVMPD P#8179 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

CHARLTON, N. - LVMPD P#13572

*CLARKSON, CASEY - LVMPD P#9170

*COOK, DARIN - LVMPD P#5730

COPLEY, B. - LVMPD P#14462

CROMWELL, MICHAEL – LVMPD P#13203 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER

*CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER INTEL

CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS – LVMPD RECORDS

*CUSTODIAN OF RECORDS – NEVADA DEPT. OF MOTOR VEHICLES

*CUSTODIAN OF RECORDS – SHERWOOD PALMS, 2645 SHERWOOD, LVN

DARBOWSKI, J. - C/O CCDA, 200 LEWIS AVE., LVN 89101

DARR, A. - LVMPD P#5485

DESOTO, DARREN – 2635 SHERWOOD ST., #18, LVN 89109

*DESOTO, LORRAINE – 2635 SHERWOOD ST., #18, LVN 89109

DOBLE, N. - LVMPD P#8298

DONOVAN, M. - LVMPD P#13241

DREDLA, M. - LVMPD P#8049

*DUKE, JUSTIN - LVMPD P#13934

*EDDINGTON, M. - LVMPD P#14206

*EDWARDS, T. - LVMPD P#9035

*FELLIG, D. – NLVPD P#2194

*FERGUSON, P. - LVMPD P#7469

FIGUORA, J. - C/O SUNRISE HOSPITAL

FINK, JAMES – LVMPD P#4780

FORNI, GARRETT - LVMPD P#14080

*FRAZIER, A. - LVMPD P#9152

FRIED, JONATHAN – LVMPD P#8174 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

GAUTHIER, KELLIE – LVMPD P#8691 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

*GILLIS, M. – LVMPD P#6432

GOLLMER, J. - LVMPD P#13429

*GOMEZ, JUAN – 3400 CABANA DRIVE, # 1050, LVN 89122

GOULDTHORPE, HEATHER – LVMPD P#8646 (or designee): LATENT PRINT EXAMINER I - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

GRAMMAS, KRISTIN K. - LVMPD P#7808 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

*GRUNWALD, JAKE - LVMPD P#9041

//

GUENTHER, EDWARD – LVMPD P#5891 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*GUERRA, J. - LVMPD P#8780

HAINES, LORI – LVMPD P#9931 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*HALASI, RYAN - LVMPD P#8793

*HARRIS, F. - LVMPD P#12940

*HARRIS, N. – NLVPD P#1962

*HEITZENRATER, J. – NLVPD P#2029

*HEMPHILL, JOSEPH - LVMPD P#9061

HILL, MARQUE – 2655 SHERWOOD ST., #18, LVN 89109

*HODSON, B. - LVMPD P#9034

*HOGAN, A. - LVMPD P#8279

*HOLSTEIN, D. – LVMPD P#3861

HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR

HUFF, C. - LVMPD P#8888

*HUTCHASON, S. - LVMPD P#7088

*IZZO, SHAWN - LVMPD P#9319

*JACKSON, ALVIN – ADDRESS UNKNOWN

*JACKSON, QUAMAE – 4800 E. TROPICANA, APT. 1021, LVN 89121

*JAHN, PETER - LVMPD P#7461

JOHNSON, DAVID – LVMPD P#9933 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*JONES, LESLIE – ADDRESS UNKNOWN

*JONES, N. - LVMPD P#9043

KELVINGTON, A. - LVMPD P#8878

KING, CRAIG – LVMPD P#9971 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

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

*LAMOTHE, JOSHUA - LVMPD P#9364

*LEBLANC, B. – LVMPD P#7316

LESTER, ANYA "SANKO" – LVMPD P#13771 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

LIVELY, JAMES - C/O CCDA, 200 LEWIS AVE., LVN 89101

*LOPEZ-MATOS, YAON – 6500 VEGAS DR., LVN 89108

LYNCH, M. - LVMPD P#8284

LYNCH, SHANDRA – LVMPD P#13206 (or designee): CRIME SCENE ANALYST II: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MACEO, ALICE – LVMPD P#7828 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*MALDONADO, J. - LVMPD P#6920

MARSCHNER, JULIE – LVMPD P#8806 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected

MARTIN, TERRY – LVMPD P#5946 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the

evidence in this case.

MAY, CRYSTAL – LVMPD P#9288 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

MCCARTHY, JASON – LVMPD P#4715

*MCCLELLAND, A. - LVMPD P#8404

MCGHEE, EBONY – LVMPD P# 5158 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MCGUIRE, J. - LVMPD P#14067

*MCINTYRE, M. - LVMPD P#13207

MCINTYRE, MORETTA – LVMPD P#13207 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

*MOORE, W. - LVMPD P#9003

*MORENO, IRENE - LVMPD P#2922

*MORRE, W. – LVMPD P#9003

MOSES, D. ANGEL – LVMPD P#8002 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

*MOSES, THERESA – 2645 SHERWOOD, LVN

MURGA, KIM – LVMPD P#10140 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

*NAJARRO, BRENDO - LVMPD P#12616

NARVARRO, B. - LVMPD P#12616

NEMICK, AMY - LVMPD P#8504 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

*NOGLE, ERICA - LVMPD P#9624

*O'GRADY, A. - LVMPD P#14071

*OLSON, J. – NLVPD P#1811

OSTROVSKY, S. - LVMPD P#13902

*PAGE, K. - P#9159

*PARQUETTE, C. – LVMPD P#13937

*PATTON, J. - LVMPD P#8289

*PRICE, SHANE - LVMPD P#7207

*QUINN, P. - LVMPD P#4377

*RADER, REGGIE - LVMPD P#6099

RAETZ, DEAN – LVMPD P#4234

RETAMOZO, CAROL – LVMPD P#14280 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

REVELS, JEROME – DISTRICT ATTORNEY INVESTIGATOR

*ROBINSON, TERRY - LVMPD P#7466

ROGERS, R. – LVMPD P#2858

SAHOTA, ERIC – LVMPD P#9932 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

*SCAVONE, R. - LVMPD P#9845

SCOTT, ASHLEY – 2645 SHERWOOD ST., #11, LVN 89109

SEAMAN-KELLY, JAN – LVMPD P#5666 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the

field of firearm and toolmark comparisons and is expected to testify thereto.

SHELL, ELIZABETH – 1918 PINEDALE AVE., MEMPHIS, TN 38127

SIMS, DR. LARY - A medical doctor, employed by the Clark County Coroner's Office as the Chief Medical Examiner/Forensic Pathologist. He is an expert in the area of forensic pathology and will give scientific opinions related thereto. He is expected to testify regarding the cause and manner of death of NATHAN RAWLS.

SMINK, JEFF – LVMPD P#6556 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

*SMITH, B. - LVMPD P#10059

*SOK, C. - LVMPD P#14069

SOKOLOWSKI, E. - LVMPD P#14190

*SOLANO, E. - LVMPD P#7588

*SOLDO, I. - LVMPD P#9153

*STEIBER, RAYMOND - LVMPD P#3542

*STOCKTON, D. - LVMPD P#9989

STONE, RANDALL - LVMPD P#2887 (or designee): FORENSIC LAB MANAGER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

TAYLOR, ERINMARIE - LVMPD P#9619 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

THOMAS, JENNIFER – LVMPD P#10074 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

//

THOMAS, KRISTINA – LVMPD P#13574 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

THOMAS, LAROY – 2655 SHERWOOD ST., #18, LVN 89109

to testify thereto.

*TORSIELLO, M. - LVMPD P#13149

*TRZPIS, STEPHEN - LVMPD P#8563

*TUCKER, KRISTEN - LVMPD P#14402

*TWOMEY, M. - LVMPD P#6501

*VAANDERING, BRENDA – LVMPD P#13575 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

VIDA, BEATA – LVMPD P#14279 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

*VIVANCO-ZAMORA, GUSTAVO – 3400 CABANA DRIVE #2051, LVN

*VORCE, RICHARD - LVMPD P#4055

WATTS, JOE – DISTRICT ATTORNEY INVESTIGATOR

WEBER, D. - LVMPD P#14457

*WELLS, D. - LVMPD P#1949

*WILLIAMS, WESTON - LVMPD P#9707

STEVEN B. WOLFSON
District Attorney
Nevada Bar #001565

BY /s//DANIELLE K. PIEPER
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that service of State's Notice, was made this 24th day of January, 2014, by Electronic Filing to:

DAVID J. OTTO, ESQ.
E-mail Address: davidottolaw@yahoo.com

Shellie Warner
Secretary for the District Attorney's Office

mmw/GANG

Curriculum Vitae

Las Vegas Criminalistics Bureau
Statement of Qualifications

Name: Brenda Vaandering P# 13575 Date: 09-02-10

CURRENT CLASSIFICATION		
	Classification	*Minimum Qualifications*
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
X	Crime Scene Analyst II	18 months - two (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		
Institution	*Major*	*Degree/Date*
Western Oregon University	Forensic Chemistry	Bachelor's of Science / 06-2007

TESTIMONY		
Yes	*No*	
X		Las Vegas Justice Court 09-15-2009

EMPLOYMENT HISTORY		
Employer	*Title*	*Date*
LVMPD	CSA I	09-02-08 to 09-02-10
LVMPD	CSA II	09-02-10 to Present

Electronically Filed
01/27/2014 11:01:03 AM

CLERK OF THE COURT

DAVID OTTO & AFFILIATES, PC
David J. Otto, Esq.
Nevada State Bar No. 5449
davidottolaw@yahoo.com
2300 West Sahara, Suite 800
Las Vegas, NV 89102
Telephone: (702) 379-6540
Facsimile: (702) 629-7929

Attorneys for Defendant
Matthew Washington

DISTRICT COURT
CLARK COUNTY

THE STATE OF NEVADA

Plaintiff

v.

MATTHEW WASHINGTON and

MARTELL MOTEN

Defendants.

Case No. C-13-294695- 2

Department No. XI

ORDER APPOINTING INVESTIGATOR

This COURT after hearing an Oral Motion for appointment of investigator made on January 22, 2014 by Matthew Washington's Defense Counsel, and finding that Defendant Matthew Washington is indigent, and pursuant to Widdis v. Second Judicial Dist. Court of State In and For County of Washoe, 968 P.2d 1165, 114 Nev. 1224 (Nev., 1998), the Court finding that an investigator should be appointed in this case It Is Hereby ORDERED:

Private Investigator James Conklin of ExFed Investigations is appointed to investigate this case on behalf of Matthew Washington and his Attorney. Such appointment shall be for no more than 50

hours of investigation into the facts and circumstances surrounding the above captioned case.

James Conklin's Business address is:

ExFed Investigations
2251 North Rampart Boulevard
Las Vegas, Nevada 89128

It is So ORDERED:

01/22/14

DISTRICT COURT JUDGE

Submitted by:

DATED this 22nd day of January 2014.

DAVID OTTO & AFFILIATES, PC

David J. Otto, Esq.
Nevada Bar #5449
2300 Sahara Ave, Suite 800
Las Vegas, Nevada 89102
davidottolaw@yahoo.com
Telephone: (702) 379-6540
Facsimile: (702) 629-7929

Counsel for Plaintiffs

Electronically Filed
01/30/2014 12:31:51 PM

CLERK OF THE COURT

NOTC
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW WASHINGTON,
#2685499

Defendant.

CASE NO: C-13-294695-1

DEPT NO: XI

THIRD SUPPLEMENTAL NOTICE OF WITNESSES AND/OR EXPERT WITNESSES [NRS 174.234]

TO: MATTHEW WASHINGTON, Defendant; and

TO: DAVID J. OTTO, ESQ., Counsel of Record:

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:

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

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

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

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

***Indicates an additional witness**

NAME ADDRESS

ADAMS, TIFFANY - LVMPD P#10072 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

AOYAMA, KATHRYN – LVMPD P#8025 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

ARCHER, ANTHONY – LVMPD P#6403

ARCINIEGA, D. - LVMPD P#14185

BAS, JENNIFER – LVMPD P#9944 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

BEAUDETTE, FRAN – LVMPD P#4361 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

BECHLER, MICHAEL - LVMPD P#4701

BECK, K. - LVMPD P#9629

BELL, L. - LVMPD P#13591

BELLO, GERARD - LVMPD P#6793

BENINCASA, FLOCERFIDA – LVMPD P#10170 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

BIDDLE, DAWN – 9540 AMBER VALLEY, LVN 89134

BLOUNT, DANIEL - LVMPD P#8287

BRANDON, J. - LMVPD 9631

BRISENDINE, D. - LVMPD P#14003

BUNTING, C. - LVMPD P#6484

BUTLER, WENDY - LVMPD P#8720

CAMERON, CATHRYN – LVMPD P#9887 (or designee): LATENT PRINT EXAMINER I - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

CAMPBELL, T. – KOHL'S – 4250 BLUE DIAMOND, LVN

CAMPBELL, T. – LVMPD P#13402

CARTER, MARNIE – LVMPD P#8179 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

CHARLTON, N. - LVMPD P#13572

CLARKSON, CASEY - LVMPD P#9170

COOK, DARIN - LVMPD P#5730

COPLEY, B. - LVMPD P#14462

CROMWELL, MICHAEL – LVMPD P#13203 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER

CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER INTEL

CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS – LVMPD RECORDS

CUSTODIAN OF RECORDS – NEVADA DEPT. OF MOTOR VEHICLES

*CUSTODIAN OF RECORDS – NEVADA DEPT. OF PAROLE & PROBATION

*CUSTODIAN OF RECORDS – NEVADA DEPT. OF PRISONS

*CUSTODIAN OF RECORDS - NLVPD

CUSTODIAN OF RECORDS – SHERWOOD PALMS, 2645 SHERWOOD, LVN

DARBOWSKI, J. - C/O CCDA, 200 LEWIS AVE., LVN 89101

DARR, A. - LVMPD P#5485

DESOTO, DARREN – 2635 SHERWOOD ST., #18, LVN 89109

DESOTO, LORRAINE – 2635 SHERWOOD ST., #18, LVN 89109

DOBLE, N. - LVMPD P#8298

DONOVAN, M. - LVMPD P#13241

DREDLA, M. - LVMPD P#8049

DUKE, JUSTIN - LVMPD P#13934

EDDINGTON, M. - LVMPD P#14206

EDWARDS, T. - LVMPD P#9035

FELLIG, D. – NLVPD P#2194

FERGUSON, P. - LVMPD P#7469

FIGUORA, J. - C/O SUNRISE HOSPITAL

FINK, JAMES – LVMPD P#4780

FORNI, GARRETT - LVMPD P#14080

FRAZIER, A. - LVMPD P#9152

FRIED, JONATHAN – LVMPD P#8174 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

GAUTHIER, KELLIE – LVMPD P#8691 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

GILLIS, M. – LVMPD P#6432

GOLLMER, J. - LVMPD P#13429

GOMEZ, JUAN – 3400 CABANA DRIVE, # 1050, LVN 89122

GOULDTHORPE, HEATHER – LVMPD P#8646 (or designee): LATENT PRINT EXAMINER I - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

GRAMMAS, KRISTIN K. - LVMPD P#7808 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and

preservation of the evidence in this case.

GRUNWALD, JAKE - LVMPD P#9041

GUENTHER, EDWARD – LVMPD P#5891 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

GUERRA, J. - LVMPD P#8780

HAINES, LORI – LVMPD P#9931 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

HALASI, RYAN - LVMPD P#8793

HARRIS, F. - LVMPD P#12940

HARRIS, N. – NLVPD P#1962

HEITZENRATER, J. – NLVPD P#2029

HEMPHILL, JOSEPH - LVMPD P#9061

HILL, MARQUE – 2655 SHERWOOD ST., #18, LVN 89109

HODSON, B. - LVMPD P#9034

HOGAN, A. - LVMPD P#8279

HOLSTEIN, D. – LVMPD P#3861

HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR

HUFF, C. - LVMPD P#8888

HUTCHASON, S. - LVMPD P#7088

IZZO, SHAWN - LVMPD P#9319

JACKSON, ALVIN – ADDRESS UNKNOWN

JACKSON, QUAMAE – 4800 E. TROPICANA, APT. 1021, LVN 89121

JAHN, PETER - LVMPD P#7461

JOHNSON, DAVID – LVMPD P#9933 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

JONES, LESLIE – ADDRESS UNKNOWN

JONES, N. - LVMPD P#9043

KELVINGTON, A. - LVMPD P#8878

KING, CRAIG – LVMPD P#9971 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

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

LAMOTHE, JOSHUA - LVMPD P#9364

LEBLANC, B. – LVMPD P#7316

LESTER, ANYA "SANKO" – LVMPD P#13771 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

LIVELY, JAMES - C/O CCDA, 200 LEWIS AVE., LVN 89101

LOPEZ-MATOS, YAON – 6500 VEGAS DR., LVN 89108

LYNCH, M. - LVMPD P#8284

LYNCH, SHANDRA – LVMPD P#13206 (or designee): CRIME SCENE ANALYST II: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MACEO, ALICE – LVMPD P#7828 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

MALDONADO, J. - LVMPD P#6920

MARSCHNER, JULIE – LVMPD P#8806 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

MARTIN, TERRY – LVMPD P#5946 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MAY, CRYSTAL – LVMPD P#9288 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

MCCARTHY, JASON – LVMPD P#4715

MCCLELLAND, A. - LVMPD P#8404

MCGHEE, EBONY – LVMPD P# 5158 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MCGUIRE, J. - LVMPD P#14067

MCINTYRE, MORETTA – LVMPD P#13207 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MOORE, W. - LVMPD P#9003

MORENO, IRENE - LVMPD P#2922

MORRE, W. – LVMPD P#9003

MOSES, D. ANGEL – LVMPD P#8002 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

MOSES, THERESA – 2645 SHERWOOD, LVN

MURGA, KIM – LVMPD P#10140 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

NAJARRO, BRENDO - LVMPD P#12616

NARVARRO, B. - LVMPD P#12616

NEMICK, AMY - LVMPD P#8504 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

NOGLE, ERICA - LVMPD P#9624

O'GRADY, A. - LVMPD P#14071

OLSON, J. – NLVPD P#1811

OSTROVSKY, S. - LVMPD P#13902

PAGE, K. - P#9159

PARQUETTE, C. – LVMPD P#13937

PATTON, J. - LVMPD P#8289

PRICE, SHANE - LVMPD P#7207

QUINN, P. - LVMPD P#4377

RADER, REGGIE - LVMPD P#6099

RAETZ, DEAN – LVMPD P#4234

RETAMOZO, CAROL – LVMPD P#14280 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

REVELS, JEROME – DISTRICT ATTORNEY INVESTIGATOR

ROBINSON, TERRY - LVMPD P#7466

ROGERS, R. – LVMPD P#2858

SAHOTA, ERIC – LVMPD P#9932 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

SCAVONE, R. - LVMPD P#9845

SCOTT, ASHLEY – 2645 SHERWOOD ST., #11, LVN 89109

SEAMAN-KELLY, JAN – LVMPD P#5666 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

SHELL, ELIZABETH – 1918 PINEDALE AVE., MEMPHIS, TN 38127

SIMS, DR. LARY - A medical doctor, employed by the Clark County Coroner's Office as the Chief Medical Examiner/Forensic Pathologist. He is an expert in the area of forensic pathology and will give scientific opinions related thereto. He is expected to testify regarding the cause and manner of death of NATHAN RAWLS.

SMINK, JEFF – LVMPD P#6556 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

SMITH, B. - LVMPD P#10059

SOK, C. - LVMPD P#14069

SOKOLOWSKI, E. - LVMPD P#14190

SOLANO, E. - LVMPD P#7588

SOLDO, I. - LVMPD P#9153

STEIBER, RAYMOND - LVMPD P#3542

STOCKTON, D. - LVMPD P#9989

STONE, RANDALL - LVMPD P#2887 (or designee): FORENSIC LAB MANAGER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

TAYLOR, ERINMARIE - LVMPD P#9619 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

//

//

THOMAS, JENNIFER – LVMPD P#10074 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

THOMAS, KRISTINA – LVMPD P#13574 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

THOMAS, LAROY – 2655 SHERWOOD ST., #18, LVN 89109

TORSIELLO, M. - LVMPD P#13149

TRZPIS, STEPHEN - LVMPD P#8563

TUCKER, KRISTEN - LVMPD P#14402

TWOMEY, M. - LVMPD P#6501

VAANDERING, BRENDA – LVMPD P#13575 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

VIDA, BEATA – LVMPD P#14279 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

VIVANCO-ZAMORA, GUSTAVO – 3400 CABANA DRIVE #2051, LVN

VORCE, RICHARD - LVMPD P#4055

WATTS, JOE – DISTRICT ATTORNEY INVESTIGATOR

WEBER, D. - LVMPD P#14457

//

//

//

//

//

WELLS, D. - LVMPD P#1949

WILLIAMS, WESTON - LVMPD P#9707

STEVEN B. WOLFSON
District Attorney
Nevada Bar #001565

BY /s//DANIELLE K. PIEPER
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that service of State's Notice, was made this 30th day of January, 2014, by Electronic Filing to:

DAVID J. OTTO, ESQ.
E-mail Address: davidottolaw@yahoo.com

Shellie Warner
Secretary for the District Attorney's Office

mmw/GANG

Electronically Filed
03/05/2014 01:16:20 PM

CLERK OF THE COURT

NOAC
WARM SPRINGS LAW GROUP
ROBERTA OHLINGER-JOHNSON, ESQ.
Nevada Bar #10946
1489 W. Warm Springs Rd. Ste. 110
Henderson NV 89014
702.966.8270 Telephone
866.592.8806 Facsimile
info@WarmSpringsLaw.com
Attorney for Defendant

DISTRICT COURT
CLARK COUNTY, NEVADA

STATE OF NEVADA,

vs.

MATTHEW WASHINGTON.

Case No.: C-13-294695-1

Dept. No.: 11

NOTICE OF ASSOCIATION

COMES NOW, Roberta Ohlinger-Johnson, Esq., of the Law Firm, WARM SPRINGS LAW GROUP, and hereby enters her notice of association with Counsel David Otto on behalf of Matthew Washington. All further pleadings, correspondence, and notices shall be served on the address below:

Roberta Ohlinger-Johnson, Esq.
WARM SPRINGS LAW GROUP
1489 W. Warm Springs Road,
Suite #110
Henderson, NV 89014

Respectfully submitted this 5th day of March, 2014.

ROBERTA OHLINGER-JOHNSON, ESQ.
Nevada Bar #10946
ELLIOTT D. YUG, ESQ.
Nevada Bar #5172
Attorney for Defendant Matthew Washington

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of March, 2014, the foregoing **NOTICE OF ASSOCIATION** was served upon the following persons and entities in open court, by personally serving the Clark County District Attorney present at the hearing.

Dated this 5th day of March, 2014.

Roberta Ohlinger-Johnson, Esq.
WARM SPRINGS LAW GROUP

Electronically Filed
03/10/2014 05:14:44 PM

CLERK OF THE COURT

NOTM

DAVID OTTO & AFFILIATES, PC
David J. Otto, Esq.
Nevada State Bar No. 5449
davidottolaw@yahoo.com
2300 West Sahara, Suite 800
Las Vegas, NV 89102
Telephone: (702) 379-6540
Facsimile: (702) 629-7929

WARM SPRINGS LAW GROUP
ROBERTA J. OHLINGER-JOHNSON, ESQ.
Nevada Bar #10946
1489 W. Warm Springs Road, Ste #110
Henderson, NV 89014
702.966.8270 Telephone
866.592.8806 Facsimile
efile@WarmSpringsLaw.com
Attorneys for Defendant

Attorneys for Defendant
Matthew Washington

DISTRICT COURT
CLARK COUNTY

THE STATE OF NEVADA

Plaintiff

v.

MATTHEW WASHINGTON

Defendant.

Case No. C-13-294695- 1

Department No. XI

NOTICE OF MOTION and MOTION IN LIMINE

NOTICE OF MOTION

TO: STATE OF NEVADA, Plaintiff

YOU AND EACH OF YOU WILL TAKE NOTICE that on the 24 day of MARCH, 2014, at 9:00 o'clock A a.m. / p.m. of said day that or as soon thereafter as counsel may be heard before Dep't XI of the Eighth Judicial District Court - located at 200 Lewis Avenue, Las Vegas, Nevada, Plaintiff will move this Court in Limine to

Limit or exclude evidence as shown in the following motion.

Now comes Defendant MATTHEW WASHINGTON, by and through counsel DAVID J. OTTO, of the Law Firm of DAVID OTTO & AFFILIATES, PC and ROBERTA OHLINGER-JOHNSON of the WARM SPRINGS LAW GROUP, and, hereby moves this Honorable Court for an order requiring the prosecution to provide him with advance notice of whether it intends to use any "bad acts" testimony under NRS 48.045(2) at trial and a ruling by this Honorable Court as to the admissibility of said evidence. The purpose of such notice is to avoid surprise at trial and to permit the efficient litigation of the issues prior to trial, minimize disruption of the trial by resolving questions of admissibility in advance, and avoid the mention or even the suggestion of potentially inadmissible evidence in the presence of the jury.

DEFENDANT ALSO MOVES hereby that any mention or use by the Prosecution - of the Statement made by Mr. WASHINGTON'S alleged Co-Conspirator to police on the morning of his arrest in this case, be excluded from the trial pursuant to Bruton v. United States, 391 U.S. 123, 88 S.Ct. 1620, 20 L.Ed.2d 476 (1968).

Submitted by:

DATED this 6th day of March 2014.

DAVID OTTO & AFFILIATES, PC

/s/ David J. Otto

David J. Otto, Esq.
Nevada Bar #5449
2300 Sahara Ave, Suite 800
Las Vegas, Nevada 89102
davidottolaw@yahoo.com
Telephone: (702) 379-6540
Facsimile: (702) 629-7929

Counsel for Plaintiffs

WARM SPRINGS LAW GROUP

3-10-14

Roberta Ohlinger-Johnson, Esq.
Nevada Bar #10946
1489 W. Warm Springs Road, Ste #110
Henderson, NV 89014
702.966.8270 Telephone
866.592.8806 Facsimile

///

///

///

///

MEMORANDUM IN SUPPORT OF MOTION IN LIMINE

"It is the general rule that the prosecution may not introduce evidence of other criminal acts of the accused unless the evidence is substantially relevant for some other purpose than to show a probability that the accused committed the charged crime because of a trait of character. Williams v. State, 95 Nev. 830, 833, 603 P.2d 694, 696 (1979): Shults v. State, 96 Nev. 742, 748, 616 P.2d 388, 392 (1980) ("But such evidence is admissible if relevant for some purpose other than to show an accused's criminal character and the probability that he committed the crime."); see also Braunstein v. State, 118 Nev. 68, 74, 40 P.3d 413, 417–18 (2002) (explaining that we abandoned our common law approach when the Legislature enacted NRS 48.045(2) into law). And consistent with the narrow rule of exclusion, we have approved of the admission of evidence of uncharged misconduct for nonpropensity purposes other than those listed in NRS 48.045(2). See, e.g., Domingues v. State, 112 Nev. 683, 694–95, 917 P.2d 1364, 1372 (1996) (affirming admission of uncharged misconduct evidence for purpose of assessing witness credibility and to explain witness's reason for delay in reporting defendant's confession); Bradley v. State, 109 Nev. 1090, 1093, 864 P.2d 1272, 1274 (1993) (affirming admission of uncharged misconduct evidence for the purpose of explaining expert opinion); Roever v. State, 114 Nev. 867, 873–74, 963 P.2d 503, 506–07 (1998) (Shearing, J., concurring) (use of evidence for impeachment was a permissible " 'other purpose' " (quoting U.S. v. Lara, 956 F.2d 994, 997 (10th Cir.1992))); Braunstein, 118 Nev. at 74–75 & n. 19, 40 P.3d at 418 & n. 19 (acknowledging purposes other than those listed in NRS 48.045(2) while concluding that "propensity for sexual aberration" is not one of those purposes because it "sounds much more like the kind of inadmissible, bad character evidence prohibited by NRS 48.045(1)").

These disparate lines of authority may cause confusion about the scope and meaning of NRS 48.045(2). Therefore, we now clarify that evidence of "other crimes, wrongs or acts" may be admitted under NRS 48.045(2) for a relevant nonpropensity purpose other than those listed in the statute. To the extent that our prior caselaw is inconsistent with this holding, it is expressly overruled.

Although we conclude that evidence of "other crimes, wrongs or acts" may be admitted for any relevant nonpropensity purpose, we reemphasize that "[a] presumption of inadmissibility attaches to all prior bad act evidence." Rosky v. State, 121 Nev. 184, 195, 111 P.3d 690, 697 (2005). "[T]he

use of uncharged bad act evidence to convict a defendant is heavily disfavored in our criminal justice system because bad acts are often irrelevant and prejudicial and force the accused to defend against vague and unsubstantiated charges." Tavares v. State, 117 Nev. 725, 730, 30 P.3d 1128, 1131 (2001). To ensure that this type of evidence is not misused, we have held that it is admissible only when the trial court determines that (1) the evidence is relevant to the crime charged, (2) the act is proven by clear and convincing evidence, and (3) the probative value of the evidence is not substantially outweighed by the danger of unfair prejudice. Tinch v. State, 113 Nev. 1170, 1176, 946 P.2d 1061, 1064–65 (1997). However, we failed to explain what purposes the evidence must be relevant for. To avoid further confusion, we modify the first factor in Tinch to reflect the narrow limits of the general rule of exclusion. In order to overcome the presumption of inadmissibility, the prosecutor must request a hearing and establish that: (1) the prior bad act is relevant to the crime charged and for a purpose other than proving the defendant's propensity, (2) the act is proven by clear and convincing evidence, and (3) the probative value of the evidence is not substantially outweighed by the danger of unfair prejudice."
Bigpond v. State , 270 P.3d 1244, 128 Nev. Adv. Op. 10 (Nev., 2012)

The relevant language of Federal Rule of Evidence 404 which is substantially similar to NRS 48.045 (2) provides that similar acts evidence is potentially admissible "upon request by the accused, the prosecution in a criminal case shall provide reasonable notice in advance of trial, or during trial if the court excuses pretrial notice on good cause shown, of the general nature of any such evidence it intends to introduce at trial.

In any criminal case in which the defendant's motive or intent, the absence of mistake or accident on his part, or the defendant's scheme, plan, or system in doing an act is material, any acts of the defendant which tend to show his motive or intent - the absence of mistake or accident on his part, or the defendant's scheme, plan, or system in doing the act in questions may be proved, whether they are contemporaneous with, prior to, or subsequent thereto, notwithstanding that such proof may show or tend to show the commission of another crime by the defendant.

In the circumstances of this case, it is possible that prior bad act evidence might be offered by the Prosecution for nothing more than the prohibited purpose of providing Defendant's criminal propensity or bad character if any or as alleged. If the prosecutor is going to introduce such

evidence, it makes far better sense to resolve admissibility questions in advance of trial and outside the presence of a jury than to consume trial time with such issues. Notice of the prosecutor's intent to introduce such evidence should be required.

Alleged Co-Conspirator Martel Moten's confession and statement against alleged Co-Conspirator Matthew Washington:

Defendant also moves that any statement by alleged Co-Conspirator Martell "Murder" Moten be excluded from the trial of this matter.

In Bruton v. United States, 544 U.S. 1033 125 S. Ct. 2269 161 L. Ed. 2d 1060 2005 U.S., the United States Supreme Court held:

When a co-defendant's confession implicates a criminal defendant, and the co-defendant does not testify at trial, the admission of the confession violates the criminal defendant's rights under the 6th amendment Confrontation Clause, even when jury instructions are given that instruct the jury to disregard the co-defendant's confession in deciding the criminal defendant's guilt.

The Court reasoned that even though the jury was instructed by the trial judge to not consider the alleged confession of co-defendant in determining Petitioner's guilt, the jury would likely nonetheless at least bear it in mind in deciding Petitioner's fate. The Court quotes Judge Learned Hand, who stated that such a limiting instruction "is a 'recommendation to the jury of a mental gymnastics which is beyond, not only their powers, but anybody else's . . . .'" The Court acknowledged that it was not possible to unequivocally know whether the jury considered the statement in deciding the guilt of Petitioner, but that the risk was so substantial that the jury did, that Petitioner's Confrontation Clause rights were violated by allowing the jury to physically hear the statements and to only protect Petitioner through an impossible to follow limiting instruction.

///

///

///

///

///

CONCLUSION

For the foregoing reasons the above motion should be granted.

Submitted by:

DATED this 6th day of March 2014.

DAVID OTTO & AFFILIATES, PC

/s/ David J. Otto

David J. Otto, Esq.
Nevada Bar #5449
2300 Sahara Ave, Suite 800
Las Vegas, Nevada 89102
davidottolaw@yahoo.com
Telephone: (702) 379-6540
Facsimile: (702) 629-7929

Counsel for Plaintiffs

WARM SPRINGS LAW GROUP

3-10-14

Roberta Ohlinger-Johnson, Esq.
Nevada Bar #10946
1489 W. Warm Springs Road, Ste #110
Henderson, NV 89014
702.966.8270 Telephone
866.592.8806 Facsimile

Electronically Filed
03/11/2014 01:22:00 PM

CLERK OF THE COURT

CSERV
DAVID OTTO & AFFILIATES, PC
David J. Otto, Esq.
Nevada State Bar No. 5449
davidottolaw@yahoo.com
2300 West Sahara, Suite #800
Las Vegas, NV 89102
702.419-1222 Telephone
702.629-7929 Facsimile

WARM SPRINGS LAW GROUP
Roberta Ohlinger-Johnson, Esq.
Nevada Bar #10946
1489 W. Warm Springs Rd. Ste. 110
Henderson, NV 89014
info@WarmSpringsLaw.com
702.966.8270 Telephone
866.592.8806 Facsimile

Attorneys for Defendant
Matthew Washington

DISTRICT COURT
CLARK COUNTY, NEVADA

STATE OF NEVADA,

vs.

MATTHEW WASHINGTON.

Case No.: C-13-294695-1

Dept. No.: 11

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of March, 2014, the foregoing **NOTICE OF MOTION and MOTION IN LIMINE** was served upon the District Attorney's office, attention Daniel Piper, by faxing a true and complete copy to (702) 455-2294 and emailing a copy to PDMotions@ClarkCountyDA.com.

Dated this 11th day of March, 2014.

Dawn M. DeMastrie
Legal Assistant
WARM SPRINGS LAW GROUP

Electronically Filed
03/21/2014 03:02:41 PM

CLERK OF THE COURT

OPPS

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW WASHINGTON,
#2685499

Defendant.

CASE NO: C-13-294695-1

DEPT NO: XI

STATE'S OPPOSITION TO DEFENDANT'S MOTION IN LIMINE

DATE OF HEARING: 03/24/14
TIME OF HEARING: 9:00 A.M.

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

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.

//

//

//

//

POINTS AND AUTHORITIES

STATEMENT OF THE CASE

On November 8, 2013, Matthew Washington and Martell Moten (hereinafter "Defendant Washington and Defendant Moten") were charged by way of Criminal Complaint with one (1) count of Conspiracy to Commit Murder, one (1) count of Murder with use of a Deadly Weapon, Victim 60 Years of Age or Older, three (3) counts of Attempt Murder with use of a Deadly Weapon, three (3) counts of Battery with Use of a Deadly Weapon, and six (6) counts of Discharging a Firearm at or Into a Structure. A preliminary hearing was set for November 22, 2013. On November 22, 2013, both Defendants requested a continuance of the preliminary hearing.

Additionally, the State of Nevada filed an Amended Criminal Complaint in open court charging Defendants with one (1) count of Conspiracy to Commit Murder with the Intent to Promote, Further or Assist a Criminal Gang, one (1) count of Murder with use of a Deadly Weapon, with the Intent to Promote, Further or Assist a Criminal Gang, three (3) counts of Attempt Murder with use of a Deadly Weapon, with the Intent to Promote, Further or Assist a Criminal Gang, two (2) counts of Battery with Use of a Deadly Weapon Resulting in Substantial Bodily Harm with the Intent to Promote, Further or Assist a Criminal Gang, and ten (10) counts of Discharging a Firearm at or Into a Structure with the Intent to Promote, Further or Assist a Criminal Gang and one (1) count of Possesion of Firearm by Ex Felon. A preliminary hearing was set for December 5, 2013. On December 5, 2013, the State started its presentation of evidence. The Court continued the preliminary hearing until December 9, 2013. On December 9, 2013, the State finished its presentation of probable cause. Defendants were bound over to District Court on all charges without the gang enhancement and without substantial bodily injury to one of the counts.

On December 23, 2013, Defendants were arraigned in District Court by way of Information charging one (1) count of Conspiracy to Commit Murder, one (1) count of Murder with use of a Deadly Weapon, three (3) counts of Attempt Murder with use of a Deadly Weapon, one (1) count of Battery with Use of a Deadly Weapon Resulting in Substantial

Bodily Harm, one (1) count of Battery with Use of a Deadly Weapon, ten (10) counts of Discharging a Firearm at or Into a Structure one (1) count of Possesion of Firearm by Ex Felon. Both Defendants pled not guilty and invoked their right to a speedy trial. A jury trial is currently set for February 3, 2014. On January 13, 2014, Defendant Moten waived his right to a speedy trial. On March 10, 2014, Defendant Matthew Washington filed a Motion in Limine. The State of Nevada opposes as follows.

THE STATEMENT OF THE FACTS

On November 5, 2013, just after 4:30 AM, approximately ten (10) shots were fired into the residence of 2655 Sherwood Street, Apt #18. The multiple shots left three (3) victims still breathing – Laroy Thomas, Marque Hill and Ashley Scott. Of the three (3), two (2) Laroy Thomas and Ashley Scott sustained gunshot wounds to their ankle areas. The fourth victim, Nathan Rawls, was killed by the gunshot wound that hit his chest. Rawls was found deady by the couch in the living room area. The apartment was riddled with bullet holes. On November 5, 2013, at approximately 4:30AM, Lorraine Desoto, was in the area of 2655 Sherwood Street and was awoken by gunfire. Desoto got up, got dressed, looked out the window and saw a vehicle. The vehicle was in an alley. The vehicle was a silver Dodge Magnum. The silver Dodge Magnum was driving west toward Van Patten. Desoto then called 911. Later that day police took Desoto to a location where she identified the silver Dodge Magnum as the vehicle she saw leave the alley.

On November 5, 2013, Officer Parquette was working as a Las Vegas Metropolitan Police officer during the graveyard shift. At approximately, 4:45AM he heard information over police dispatch about a shooting and the details of a vehicle that could be involved. The description of the vehicle was a dark or silver Dodge Magnum with tinted windows. Officer Parquette drove to the boarding area command. Officer Parquette observed a silver Dodge Magnum with tinted windows and conducted a felony car stop on that vehicle. Two (2) males were in the vehicle. Defendant Washington was driving the vehicle and Defendant Moten was in the back seat of the vehicle. Both Defendants were taken into custody. The vehicle was cleared. The driver, Defendant Washington gave oral consent to search the vehicle. Officer

Parquette and his partner walked to the back left door, which was open. Looking through the back passenger left side he saw a butt of a gun sticking out from the right passenger seat on the floor board. Officer Parquette then waited for homicide detectives to do further investigation.

Crime Scene Analyst Cromwell arrived on scene and recovered the firearm pursuant to a search warrant. The firearm was a 9mm Smith & Wesson semi –automatic. It was retrieved from under the front passenger seat. Later CSA Cromwell was called back out to retrieve an additional firearm that was located by Detective Rogers from the silver Dodge Magnum. The second firearm was found underneath the steering column. That firearm was a 40 caliber Glock 22.

On November 5, 2013, Detective Raetz went to the crime scene and observed bullet holes in apartment #18 of 2655 Sherwood Street. There were 13 separate cartridge cases – 9 located out in the courtyard itself. Six (6) were 9 millimeter cartridge casings and seven (7) 40 caliber cartridge casings.

Detectives interviewed Defendant Washtington and Defendant Moten. Each Defendant denies that they were involved in shooting apartment #18. Each Defendant acknowledges that they were in the area of the crime and that a person known as "LG" or "LJ" had an issue with the victim Nathan Rawls. Each Defendant says that it is "LG" or "LJ" that goes to the complex with the other.

STATE UNDERSTANDS ITS OBLIATIONS UNDER BRUTON vs. UNITED STATES

Defendants cite to Bruton v. United States, 391 U.S. 123, 88 S.Ct. 1620 (1968), stating that the statement of Martell Moten is not admissible in the trial. This argument, however, is not persuasive and the Defendants' motion should be denied. In fact, the United States Supreme Court and Nevada case-law provide that if a statement is redacted to exclude defendant's existence and the statement is not incriminating on its face but only when linked with other evidence introduced later at trial, then a limiting instruction will cure any prejudice. See Ducksworth v. State, 114 Nev. 951 (1998); Lisle v. State, 113 Nev. 679, 941 P.2d 459

(1997) (overruled on other grounds); Stevens v. State, 97 Nev. 443 (1981); see also Richardson v. Marsh, 481 U.S. 200, 107 S.Ct. 1702 (1987).

In fact, redaction is not per se barred. Specifically, in People v. Fletcher, 13 Cal.4th 451, 917 P.2d 187 (1996), the holding states the following:

> We hold, therefore, that editing a non-testifying codefendant's extrajudicial statement to substitute pronouns or similar neutral terms for the defendant's name will not invariably be sufficient to avoid violation of the defendant's Sixth Amendment confrontation rights. Rather, the sufficiency of this form of editing must be determined on a case-by-case basis in light of the statement as a whole and the other evidence presented at the trial. Fletcher, at 582, 197.

Additionally, in State v. Tucker, 10 Haw.App. 43, 861 P.2d 24 (1993), the court stated the following, "We believe that this case-by-case approach best protects the Confrontation Clause rights of a defendant in situations where redaction is used to edit an otherwise inadmissible out-of-court statement." Tucker, at 66 and 35. Consequently, the case does not stand for a bar of editing, rather it stands for a case by case review of the editing. As such, parties should propose an edited version of Defendants statements and the parties and this Court can make a determination based on the facts of this case as to what would be permissible rather than just granting severance because the cases do not mandate it, per se.

Additionally under some circumstances, a statement by a co-conspirator maybe offered for the truth and is not considered hearsay, such as the case when a statement is made in furtherance of a conspiracy.

Pursuant to Goldsmith v Sheriff, of Lyon County, 85 Nev. 295, 454 P.2d 86 (1969), the statement of a co-conspirator is admissible.

> In Nevada, since 1886, it has not been necessary to establish a prima facie existence of a conspiracy before the hearsay statements of the co-conspirators could be admitted. However, before those hearsay statements can be considered by the magistrate it is incumbent upon him to examine all the other evidence to determine whether, aliunde, the existence of a conspiracy was established; State v. Beck, 42 Nev. 209, 174 P. 714 (1918); and, its admission is not reversible error if the conspiracy is subsequently shown; State v. Ward, 19 Nev. 297, 10 P. 133 (1886). In McNeil v. United States, 66 App.D.C. 199, 85

> F.2d 698 (1936), the court said: 'There is rarely in a conspiracy case direct evidence of the conspiracy or proof of declarations. The evidence is nearly always circumstantial; and where such evidence is introduced disclosing conduct of persons charged with conspiracy which points to that unlawful end, it is permissible to produce it at any stage of the case. The obligation which the government assumes is to connect up the evidence so that when the case is submitted there is sufficient, when connected up, to show the guilt of the accused to the satisfaction of the jury beyond a reasonable doubt. Therefore, in all conspiracy cases great latitude in the introduction of testimony is allowed. It is enough that the evidence offered tends to elucidate the inquiry or to assist in determining the truth. Courts, as a general rule, do not reverse judgments because of the order in which testimony was received, or because some of it was irrelevant.'

Therefore, while the State generally agrees a co-conspirator's statement cannot be presented to a jury by the State against another co-conspirator without the declarant testifying, there are some circumstances in which the co-conspirators statement are admissible.

THE STATE UNDERSTANDS IS OBLIGATION UNDER NRS 48.045 (2) AND PETROCELLI

Pursuant to NRS 48.045(2), "evidence of other crimes, wrongs or acts is not admissible to prove the character of a person in order to show that he acted in conformity therewith." However, such evidence may "be admissible for other purposes, such as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident." *See also* Canada v. State, 104 Nev. 288, 291-293, 756 P.2d 552, 554-555 (1988)(Evidence of other robbery was admissible for purpose of proving identity given the difficulty of identifying the suspects and the high degree of similarities between the crimes). In order to admit such evidence, the State must establish that (1) the prior act is relevant to the crime charged; (2) the act is proven by clear and convincing evidence; and (3) the evidence is more probative than prejudicial. Cipriano v. State, 111 Nev. 534, 541, 894 P.2d 347, 352 (1995), *overruled on other grounds by* State v. Sixth Judicial District Court, 114 Nev. 739, 964 P.2d 48 (1998). The admissibility of prior bad acts is within the sound discretion of the trial court and will not be overturned on appeal unless found to be manifestly wrong. Canada,

104 Nev. at 292, 756 P.2d at 554.

There is a long line of consistent case history allowing such evidence to be admitted for the purpose of showing guilty knowledge, intent, and absence of mistake. In U.S. v. Dasilva, 725 F.2d 828 (2nd Cir. 1983), where the defendant denied knowing that gifts he was paid to deliver were stuffed with narcotics, evidence that he had successfully made other deliveries of similar packages for the same individual were admissible to show knowledge. In U.S. v. Hogan, 486 F.2d 222 (4th Cir. 1973), in a prosecution for distribution of heroin, evidence of prior transactions were admissible to show guilty knowledge. Evidence tending to prove knowledge was also allowed in Sears v. U.S., 490 F.2d 150 (8th Cir. 1974), where prior participation in bootlegging alcohol was admissible in prosecution for the sale of moonshine whisky.

In United States v. Haxelett, 32 F3d 1313 (8th Cir. 1994), evidence of previous arrest for possession of crack cocaine was admissible to show knowledge and intent to distribute. In fact, despite the fact that the conviction was reversed in Haxelett, evidence of the arrest was deemed admissible in a subsequent trial. Similarly, in United States v. Ramirez-Calderone, 810 F.Supp. 136 (MD Pa. 1992), the court held that evidence of a defendant's prior drug dealings was admissible under Rule 404(b) for purpose of showing previous relationship with a co-conspirator, background, familiarity with drug transactions, scheme, knowledge and intent. The court in Ramirez- Calderone further held that "admissibility for additional purposes including essential background information . . . has been recognized and approved by our Court of Appeals." Id. at 138 (*citing* U.S. v. Scarfo, 850 F.2d 1015, 1019 (3rd Cir.1988)). Moreover, in Ford v. State, 122 Nev. 796, --, 138 P.3d 500, 507 (2005), the Supreme Court upheld the admission of evidence of other burglaries to prove the Defendant's intent and/or absence of mistake when he broke into the victim's home.

In Williams v. State, 95 Nev. 830, 603 P.2d 694 (1979), wherein the Defendant was charged with sexual assault, the Court held that evidence concerning prior sexual assaults committed by the Defendant was relevant to prove his intent and absence of mistake. In Williams, the complaining victim testified that she met the defendant while discussing a

possible job as his secretary. The defendant remained even though asked to leave by the victim. The defendant offered $5,000.00 for a "one night stand." After the victim refused, the defendant stated that he had a black belt in karate and demonstrated what he could do to her, at which point the sexual assault occurred. Thereafter, the defendant testified that the sexual intercourse was consensual. Two (2) victims from prior sexual assaults committed by the defendant in the nineteen (19) months before the charged crime then testified that they met the defendant through a job interview and were coerced into having sexual intercourse after the defendant demonstrated his ability with karate.

In upholding the trial court's admission of the evidence concerning these prior sexual assaults, the Nevada Supreme Court stated:

> In the instant case, evidence of Williams' sexual misconduct with other persons was admitted as being relevant to prove his intent to have intercourse with the victim without her consent. This evidence was introduced after Williams admitting committing the act, but claimed to have done so with the victim's consent. By acknowledging the commission of the act but asserting his innocent intent by claiming consent as a defense, Williams himself placed in issue a necessary element of the offense and it was, therefore, proper for the prosecution to present the challenged evidence, which was relevant on the issue of intent, in order to rebut Williams' testimony on a point material to the establishment of his guilty." (95 Nev. at 833).

This Court should allow the State to admit Defendant's prior acts pursuant to NRS 48.045(2) because it exhibits Defendants knowledge, intent, and absence of mistake when selling the lead weights.

After a court finds that evidence of other crimes does not violate NRS 48.045(2), the court must then review the evidence in regard to NRS 48.035. This statute requires a weighing of probative value against prejudicial effect. Tucker v. State, 82 Nev. 127 (1966). In Tucker the Nevada Supreme Court stated how the balancing of "probative vs. prejudicial" is to occur, 8 Nev. at 130:

> The reception of such evidence is justified by necessity and, if other evidence has substantially established the element of the crime involved (motive, intent, identity, absence of mistake, etc.), the probative value of showing another offense is diminished, and the trial court should rule it inadmissible even though relevant and within an exception to the rule of exclusion.

Nevada Revised Statute 48.045(2) also allows the use of other uncharged misconduct to show intent, plan, knowledge, identity or absence of mistake or accident. There is no requirement that the proposed evidence be of a conviction. *See for example* Darnell v. State, 92 Nev. 680, 558 P.2d 642 (1976), where evidence that the defendant had previously purchased stolen property was properly admitted to prove he intended to possess stolen property in an attempt prosecution. Also, in Reed v. State, 95 Nev. 190, 591 P.2d (1979), the State was permitted to admit evidence of two (2) other motel burglaries where the defendant's fingerprints were recovered, to show identity. And in Petrocelli v. State, 101 Nev. 46, 692 P.2d 503, and Thompson v. State, 102 Nev. 348, 721 P.2d 1290 (1986), the court permitted evidence of other uncharged misconduct in order to show plan. (Petrocelli v. State, 101 Nev. 46, *modified on other grounds by* Sonner v. State, 112 Nev. 1328, 1333-34, (1996) *and superseded in part by statute as stated in* Thomas v. State, 120 Nev. 37, 45, (2004)).

Furthermore, "clear and convincing proof of collateral acts can be established by an offer of proof outside the presence of the jury combined with the quality of the evidence actually presented to the jury." Salgado v. State, 114 Nev. 1039, 1043, 968 P.2d 324 (1998). Since the defendant has never been adjudicated guilty in the arrest, the State must show by clear and convincing evidence that the defendant committed the other crimes. Petrocelli v. State, 101 Nev. 46. The State intends to do so in an evidentiary hearing prior to trial.

Finally, to ensure such evidence is considered by the jury only for the proper purposes in which it would be admitted a limiting instruction to the jury should be given both at the time the evidence is presented and in the closing instructions. Tavares v. State, 117 Nev. 725, (2001)(*holding modified by* Mclellan v. State, 182 P.3d 106, 110 (Nev. 2008)(clarifying that the defendant may waive the giving of a limiting instruction when the bad act evidence is admitted at trial). The State requests such an instruction be given if evidence of uncharged misconduct is sought to be admitted.

//

//

In the instant case, the State of Nevada has not sought to introduce evidence of Defendant's prior bad acts. Moreover, defense has not articulated what if any evidence it seeks the State to preclude from presenting to the jury in its case in chief. Thus, this Court should deny Defendant's motion as it seeks no specific relief.

CONCLUSION

Therefore, based on the foregoing, the State asks this Court to deny the Defendant's Motion in Limine because it seeks no specific relief.

DATED this 21st day of March, 2014.

Respectfully submitted,

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

BY /s//DANIELLE K. PIEPER
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that service of State's Notice, was made this 21st day of March, 2014, by Electronic Filing to:

DAVID J. OTTO, ESQ.
E-mail Address: davidottolaw@yahoo.com

Shellie Warner
Secretary for the District Attorney's Office

DKP/mmw/GANG

ORIGINAL

AINF
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT
APR 07 2014
BY, MICHELE TUCKER, DEPUTY

C-13-294695-1
AINF
Amended Information
3682299

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,
Plaintiff,
-vs-
MATTHEW WASHINGTON,
#2685499
Defendant.

Case No: C-13-294695-1
Dept No: VI

AMENDED
INFORMATION

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

That MATTHEW WASHINGTON, the Defendant above named, having committed the crimes of **CONSPIRACY TO COMMIT MURDER (Category B Felony NRS - 199.480, 200.010, 200.030); MURDER WITH USE OF A DEADLY WEAPON (Category A Felony NRS - 200.010, 200.030); ATTEMPT MURDER WITH USE OF A DEADLY WEAPON (Category B Felony NRS - 193.330, 200.010, 200.030); BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM (Category B Felony NRS - 200.481.2e); BATTERY WITH USE OF A DEADLY WEAPON (Category B Felony NRS - 200.481); DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT (Category**

B Felony NRS - 202.285) and, on or about the 5th day of November, 2013, within the County of Clark, State of Nevada, contrary to the form, force and effect of statutes in such cases made and provided, and against the peace and dignity of the State of Nevada,

COUNT 1 - CONSPIRACY TO COMMIT MURDER

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there meet with each other and between themselves and each of them with the other, willfully, unlawfully and feloniously conspire and agree to commit a crime, to-wit: Murder with use of a deadly weapon, and in furtherance of said conspiracy, Defendant MATTHEW WASHINGTON and MARTELL MOTEN did commit the acts as set forth in Counts 2 - 18, said acts being incorporated by this reference as though fully set forth herein.

COUNT 2 - MURDER WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there willfully, feloniously, without authority of law, and with premeditation and deliberation, and with malice aforethought, kill NATHAN RAWLS, a human being, by shooting at and into the body of the said NATHAN RAWLS, with a deadly weapon, to-wit: a firearm; the said actions of the Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, resulting in the death of the said NATHAN RAWLS, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times striking at and into the body of NATHAN RAWLS resulting in the death of the said NATHAN RAWLS, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator

left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each with the specific intent to commit murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission

COUNT 3 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there, without authority of law, and malice aforethought, willfully and feloniously attempt to kill ASHLEY SCOTT, a human being, by shooting at and into the body of the said ASHLEY SCOTT, with a deadly weapon, to-wit: a firearm, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times striking at and into the body of ASHLEY SCOTT, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other with the specific intent to commit this

murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 4 - BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, and feloniously use force or violence upon the person of another, to-wit: ASHLEY SCOTT, with use of a deadly weapon, to-wit: a firearm, by shooting at and into the body of the said ASHLEY SCOTT, resulting in substantial bodily harm to the said ASHLEY SCOTT, Defendant MATTHEW WASHINGTON and MARTELL MOTEN, being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times striking at and into the body of ASHLEY SCOTT, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other to commit this crime whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 5 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there, without authority of law, and malice aforethought, willfully and feloniously attempt to kill LAROY THOMAS, a human being,

by shooting at and into the body of the said LAROY THOMAS, with a deadly weapon, to-wit: a firearm, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times striking at and into the body of LAROY THOMAS, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other with the specific intent to commit this murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 6 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there, without authority of law, and malice aforethought, willfully and feloniously attempt to kill MARQUE HILL, a human being, by shooting at the body of the said MARQUE HILL, with a deadly weapon, to-wit: a firearm, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each

other in this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at the body of MARQUE HILL, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other with the specific intent to commit murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 7 – BATTERY WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there wilfully, unlawfully, and feloniously use force or violence upon the person of another, to-wit: MARQUE HILL, with use of a deadly weapon, to-wit: firearm, by shooting at and into the body of MARQUE HILL, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at the body of MARQUE HILL, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW

WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other with the specific intent to commit murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 8 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 9 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant

MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 10 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 11 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 12 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of

more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 13 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 14 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located

at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 15 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL

MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 16 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 17 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there willfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or

unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

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

BY _____
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610

Names of witnesses known to the District Attorney's Office at the time of filing this Information are as follows:

NAME	ADDRESS
CUSTODIAN OF RECORDS	CLARK COUNTY DETENTION CENTER
CUSTODIAN OF RECORDS	LVMPD COMMUNICATIONS
CUSTODIAN OF RECORDS	LVMPD RECORDS
DESOTO, DARRIN	2635 SHERWOOD ST., #18, LVN 89109
DESOTO, DARRIN	2635 SHERWOOD ST., #18, LVN 89109
FINK, JAMES	LVMPD P#4780
HILL, MARQUE	2655 SHERWOOD ST., #18, LVN 89109
HONAKER, JAMIE	DISTRICT ATTORNEY INVESTIGATOR
MCCARTHY, JASON	LVMPD P#4715
PAIQUETTE, C.	LVMPD P#13937
RAETZ, DEAN	LVMPD P#4234
REVELS, JEROME	DISTRICT ATTORNEY INVESTIGATOR
ROGERS, R.	LVMPD P#2858
SCOTT, ASHLEY	2645 SHERWOOD ST., #11, LVN 89109
SHELL, ELIZABETH	1918 PINEDALE AVE., MEMPHIS, TN 38127
SIMMS, DR. LARY	CLARK COUNTY CORONER'S OFFICE
THOMAS, LAROY	2655 SHERWOOD ST., #18, LVN 89109
WATTS, JOE	DISTRICT ATTORNEY INVESTIGATOR

DA#13F18022A/B/mmw/GANG
LVMPD EV#1311050479
(TK5)

ORIGINAL

AINF
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT
APR 11 2014
BY MICHELE TUCKER, DEPUTY

DISTRICT COURT
CLARK COUNTY, NEVADA

C-13-294695-1
AMEN
Amended
3681831

THE STATE OF NEVADA,
Plaintiff,
-vs-
MATTHEW WASHINGTON,
#2685499
Defendant.

Case No: C-13-294695-1
Dept No: I

SECOND AMENDED INFORMATION

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

That MATTHEW WASHINGTON, the Defendant above named, having committed the crimes of **CONSPIRACY TO COMMIT MURDER (Category B Felony NRS - 199.480, 200.010, 200.030); MURDER WITH USE OF A DEADLY WEAPON (Category A Felony NRS - 200.010, 200.030); ATTEMPT MURDER WITH USE OF A DEADLY WEAPON (Category B Felony NRS - 193.330, 200.010, 200.030); BATTERY WITH USE OF A DEADLY WEAPON (Category B Felony NRS - 200.481); DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT (Category B Felony NRS - 202.285) and**, on or about the 5th day of November, 2013, within

the County of Clark, State of Nevada, contrary to the form, force and effect of statutes in such cases made and provided, and against the peace and dignity of the State of Nevada,

COUNT 1 - CONSPIRACY TO COMMIT MURDER

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there meet with each other and between themselves and each of them with the other, willfully, unlawfully and feloniously conspire and agree to commit a crime, to-wit: Murder with use of a deadly weapon, and in furtherance of said conspiracy, Defendant MATTHEW WASHINGTON and MARTELL MOTEN did commit the acts as set forth in Counts 2 - 17, said acts being incorporated by this reference as though fully set forth herein.

COUNT 2 - MURDER WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there willfully, feloniously, without authority of law, and with premeditation and deliberation, and with malice aforethought, kill NATHAN RAWLS, a human being, by shooting at and into the body of the said NATHAN RAWLS, with a deadly weapon, to-wit: a firearm; the said actions of the Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, resulting in the death of the said NATHAN RAWLS, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times striking at and into the body of NATHAN RAWLS resulting in the death of the said NATHAN RAWLS, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting,

Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each with the specific intent to commit murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission

COUNT 3 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there, without authority of law, and malice aforethought, willfully and feloniously attempt to kill ASHLEY SCOTT, a human being, by shooting at and into the body of the said ASHLEY SCOTT, with a deadly weapon, to-wit: a firearm, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times striking at and into the body of ASHLEY SCOTT, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator,

conspiring with each other with the specific intent to commit this murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 4 - BATTERY WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, and feloniously use force or violence upon the person of another, to-wit: ASHLEY SCOTT, with use of a deadly weapon, to-wit: a firearm, by shooting at and into the body of the said ASHLEY SCOTT, Defendant MATTHEW WASHINGTON and MARTELL MOTEN, being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times striking at and into the body of ASHLEY SCOTT, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other to commit this crime whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 5 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there, without authority of law, and malice aforethought, willfully and feloniously attempt to kill LAROY THOMAS, a human being, by shooting at

and into the body of the said LAROY THOMAS, with a deadly weapon, to-wit: a firearm, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times striking at and into the body of LAROY THOMAS, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other with the specific intent to commit this murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 6 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there, without authority of law, and malice aforethought, willfully and feloniously attempt to kill MARQUE HILL, a human being, by shooting at the body of the said MARQUE HILL, with a deadly weapon, to-wit: a firearm, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by

accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at the body of MARQUE HILL, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other with the specific intent to commit murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 7 – BATTERY WITH USE OF A DEADLY WEAPON

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator, did then and there wilfully, unlawfully, and feloniously use force or violence upon the person of another, to-wit: LAROY THOMAS, with use of a deadly weapon, to-wit: firearm, by shooting at and into the body of LAROY THOMAS, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a killing occur, by providing counsel and encouragement and by assisting each other in this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at the body of LAROY THOMAS, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, Defendant MATTHEW

WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and encouraging each other throughout by words or deeds, and/or (3) Defendant MATTHEW WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with each other with the specific intent to commit murder whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in its commission.

COUNT 8 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 9 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located

at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 10 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the

unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 11 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 12 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act,

and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 13 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 14 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 15 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more

firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 16 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

COUNT 17 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT

Defendant MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there willfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located

at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendant MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or more of the following principles of criminal liability, to-wit: (1) by directly committing said act, and/or (2) by Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one or more of their member acted as lookouts, as one or more of their member discharged one or more firearms multiple times at or into a structure, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately after the shooting, Defendant MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) pursuant to a conspiracy to commit this crime.

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

BY
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610

DA#13F18022A/B/mmw/GANG
LVMPD EV#1311050479
(TK5)

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT
APR 15 2014
BY: MICHELE TUCKER, DEPUTY

DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA

Plaintiff(s),

-vs-

MATTHEW WASHINGTON

Defendant(s).

CASE NO. C294695-1

DEPT. NO. I

PROPOSED JURY INSTRUCTIONS NOT USED AT TRIAL

Attached hereto are the proposed jury instructions which were offered to the Court, but not submitted to the jury in the above entitled action.

DATED: This 15th day of April, 2014.

Steven D. Grierson, Clerk of the Court

By:
Michele L. Tucker, Deputy Clerk

S:\Trials\C294695 Proposed Jury Inst Not Used.doc4/15/2014

INST

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,
Plaintiff,
-vs-
MATTHEW WASHINGTON,
Defendant.

CASE NO: C-13-294695-1
DEPT NO: I

In addition to the instructions proposed by the State in this Case – Defendant Matthew Washington proposes the following instructions also be given to the Jury.

DEFENSE PROPOSED INSTRUCTIONS TO THE JURY

INSTRUCTION NO._____

Motive is not an element of the crime charged and need not be shown. However, you may consider motive or lack of motive as a circumstance in this case. Presence of motive may tend to establish guilt. Absence of motive may be sufficient to leave you with a reasonable doubt as to the guilt of the defendant. You will therefore give its presence or absence, as the case may be, the weight to which you find it to be entitled.

People v. Estep (96) 42 CA4th 733 [49 CR2d 859] held that the

failure of the trial court to sua sponte modify CJ 2.51 as set forth above did not violate due process. However, the decision does not foreclose raising the issue in other state courts or in federal court. Nor does Estep rule out modification of the instruction upon request.

People v. Frye (98) 18 C4th 894, 958 [77 CR2d 25] held that in light of other instructions given in that case, and the prosecutor's argument, use of the term innocence in CJ 2.51 regarding motive did not shift the burden of proof to the defendant to prove his innocence.

INSTRUCTION NO._____

Battery with a Deadly Weapon is a lesser included offense of Attempted Murder. The Court instructs the jury that you may find the defendant guilty of this lesser included offense of Battery with a Deadly Weapon if you do not find the defendant guilty of Attempted Murder. The Court instructs the jury that you may find the defendant guilty of this lesser included offense of Battery with a Deadly Weapon if you do not find the defendant guilty of Attempted Murder with a deadly weapon.

Walker v. State, 110 Nev. 571, 876 P.2d 646 (Nev., 1994)

Submitted by David J. Otto, on behalf of Defendant Matthew Washington April 15, 2014.

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW WASHINGTON, Appellant, vi. THE STATE OF NEVADA, Respondent.	No. 65998

APPELLANT'S APPENDIX VOLUME III PAGES 445-687

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

CATHERINE CORTEZ MASTO
Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717
(702) 687-3538

Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 1st day of June, 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
SHARON DICKINSON

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

MATTHEW WASHINGTON
NDOC # 1061467
c/o High Desert State Prison
PO Box 650
Indian Springs, NV 89070

BY _____
Employee, Clark County Public Defender's Office

IN THE SUPREME COURT OF THE STATE OF NEVADA

MATTHEW WASHINGTON,
Appellant,
v.
THE STATE OF NEVADA,
Respondent.

No. 65998

Electronically Filed
Jun 02 2015 08:24 a.m.
Tracie K. Lindeman
Clerk of Supreme Court

APPELLANT'S APPENDIX VOLUME III PAGES 445-687

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

CATHERINE CORTEZ MASTO
Attorney General
100 North Carson Street
Carson City, Nevada 89701-4717
(702) 687-3538

Counsel for Respondent

INDEX
MATTHEW WASHINGTON
Case No. 65998

	PAGE NO.
Amended Criminal Complaint filed 11/20/2013	008-024
Amended Information filed 04/07/2014	658-671
Certificate of Service filed 03/11/2014	647
Criminal Complaint filed 11/06/2013	001-007
District Court Minutes from 12/23/2013 through 06/18/2014	797-831
Information filed 12/20/2013	426-440
Instructions to the Jury filed 04/16/2014	688-741
Instructions to the Jury filed 04/16/2014	750-767
Instructions to the Jury filed 04/17/2014	769-780
Judgment of Conviction filed 06/27/2014	786-789
Justice Court Minutes from 11/08/2013 through 12/09/2013	418-425
Memorandum of Ineffective Counsel and Notice of a Complete Breakdown in Communication Between Attorney and Client filed 05/19/2014	783-785
Notice of Appeal filed 06/30/2014	790-792
Notice of Appeal filed 07/17/2014	793-796
Notice of Association filed 03/05/2014	639-640
Notice of Department Reassignment filed 04/28/2014	782
Notice of Motion and Motion in Limine filed 03/10/2014	641-646
Notice of Motion and Motion to Sever Defendants filed 12/30/2013	441-444
Notice of Witnesses and/or Expert Witnesses filed 01/06/2014	445-588
Order Appointing Investigator filed 01/27/2014	626-627
Proposed Jury Instruction Not Used at Trial filed 04/15/2014	685-687
Reporter's Transcript of Preliminary A.M. Hearing heard 12/05/2013	025-122
Reporter's Transcript of Preliminary Hearing heard 12/09/2013	242-417
Reporter's Transcript of Preliminary P.M. Hearing heard 12/05/2013	123-241
Second Amended Information filed 04/11/2014	672-684

///

Second Amended Information filed 04/16/2014 747-749

Second Supplemental Notice of Witnesses and/or Expert Witnesses filed 01/27/2014 614-625

State's Opposition to Defendant's Motion in Limine filed 03/21/2014 648-657

Supplemental Notice of Witnesses and/or Expert Witnesses filed 01/21/2014 603-613

The State of Nevada's Opposition to Defendant Washington's Motion to Sever and Opposition to Defendant Moten's Motion to Sever and Joinder in Defendant Washington's Motion to Sever filed 01/17/2014 589-602

Third Supplemental Notice of Witnesses and/or Expert Witnesses filed 01/30/2014 628-638

Verdict filed 04/16/2014 742-746

Verdict filed 04/16/2014 768

Verdict filed 04/17/2014 781

TRANSCRIPTS

Transcript of Proceedings,
Jury Trial—Day One
Date of Hrg: 04/07/2014 888-1021

Transcript of Proceedings,
Jury Trial—Day Two
Date of Hrg: 04/08/2014 1022-1202

Transcript of Proceedings,
Jury Trial—Day Three
Date of Hrg: 04/09/2014 1203-1323

Transcript of Proceedings,
Jury Trial—Day Four
Date of Hrg: 04/10/2014 1324-1493

Transcript of Proceedings,
Jury Trial—Day Five
Date of Hrg: 04/11/2014 1494-1730

Transcript of Proceedings,
Jury Trial—Day Six
Date of Hrg: 04/14/2014 1731-1857

Transcript of Proceedings,
Jury Trial—Day Seven
Date of Hrg: 04/15/2014 1858-1906

Transcript of Proceedings,
Jury Trial—Day Eight
Date of Hrg: 04/16/2014 1907-1951

Transcript of Proceedings,
Jury Trial—Day Nine (Penalty Phase)
Date of Hrg: 04/17/2014 1952-2039

Recorder's Transcript,
Calendar Call
Date of Hrg: 01/29/2014 858-863

Recorder's Transcript,
Calendar Call
Date of Hrg: 02/05/2014 864-869

Recorder's Transcript,
Calendar Call; Defendant's Motion in Limine
Date of Hrg: 04/02/2014 876-882

Recorder's Transcript,
Defendant's Motion in Limine
Date of Hrg: 03/24/2014 874-875

Recorder's Transcript,
Motions to Sever
Date of Hrg: 01/22/2014 850-857

Recorder's Transcript,
Motion to Sever Defendants; Status Check: Trial Setting and Death Penalty
Date of Hrg: 01/13/2014 840-849

Recorder's Transcript,
Sentencing
Date of Hrg: 06/18/2014 2040-2055

Recorder's Transcript,
Status Check: Trial Readiness
Date of Hrg: 03/05/2014 870-873

Recorder's Transcript,
Status Check – Trial Readiness (BOTH)
Date of Hrg: 12/30/2013 863-839

Recorder's Transcript,
Telephonic Conference RE: Trial Judge
Date of Hrg: 04/04/2014 883-887

Recorder's Transcript of Hearing,
Initial Arraignment
Date of Hrg: 12/23/2013 832-835

01/06/2014 12:43:25 PM

CLERK OF THE COURT

NOTC
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

MATTHEW WASHINGTON,
#2685499

Defendant.

CASE NO: C-13-294695-1

DEPT NO: VI

NOTICE OF WITNESSES AND/OR EXPERT WITNESSES
[NRS 174.234]

TO: MATTHEW WASHINGTON, Defendant; and

TO: DAVID J. OTTO, ESQ., Counsel of Record:

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:

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

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

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

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

//

P:\WPDOCS\NOTICE\318\31802201.doc

NAME ADDRESS

ADAMS, TIFFANY - LVMPD P#10072 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

AOYAMA, KATHRYN – LVMPD P#8025 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

BAS, JENNIFER – LVMPD P#9944 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

BEAUDETTE, FRAN – LVMPD P#4361 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

BENINCASA, FLOCERFIDA – LVMPD P#10170 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

CAMERON, CATHRYN – LVMPD P#9887 (or designee): LATENT PRINT EXAMINER I - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

CARTER, MARNIE – LVMPD P#8179 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

CROMWELL, MICHAEL – LVMPD P#13203 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

CUSTODIAN OF RECORDS – CLARK COUNTY DETENTION CENTER

CUSTODIAN OF RECORDS – LVMPD COMMUNICATIONS

CUSTODIAN OF RECORDS – LVMPD RECORDS

DESOTO, DARRIN – 2635 SHERWOOD ST., #18, LVN 89109

FINK, JAMES – LVMPD P#4780

FRIED, JONATHAN – LVMPD P#8174 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

GAUTHIER, KELLIE – LVMPD P#8691 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

GOULDTHORPE, HEATHER – LVMPD P#8646 (or designee): LATENT PRINT EXAMINER I - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

GUENTHER, EDWARD – LVMPD P#5891 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

HAINES, LORI – LVMPD P#9931 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

HILL, MARQUE – 2655 SHERWOOD ST., #18, LVN 89109

HONAKER, JAMIE – DISTRICT ATTORNEY INVESTIGATOR

JOHNSON, DAVID – LVMPD P#9933 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

KING, CRAIG – LVMPD P#9971 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

KRYLO, JAMES – LVMPD P#5945 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Deparment. He is an expert in the

field of firearm and toolmark comparisons and is expected to testify thereto.

LESTER, ANYA "SANKO" – LVMPD P#13771 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

LYNCH, SHANDRA – LVMPD P#13206 (or designee): CRIME SCENE ANALYST II: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MACEO, ALICE – LVMPD P#7828 (or designee): LATENT PRINT EXAMINER - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

MARSCHNER, JULIE – LVMPD P#8806 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected

MARTIN, TERRY – LVMPD P#5946 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MAY, CRYSTAL – LVMPD P#9288 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

MCCARTHY, JASON – LVMPD P#4715

MCGHEE, EBONY – LVMPD P# 5158 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

MCINTYRE, MORETTA – LVMPD P#13207 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and

preservation of the evidence in this case.

MOSES, D. ANGEL – LVMPD P#8002 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

MURGA, KIM – LVMPD P#10140 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

NEMICK, AMY - LVMPD P#8504 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

PAIQUETTE, C. – LVMPD P#13937

RAETZ, DEAN – LVMPD P#4234

RETAMOZO, CAROL – LVMPD P#14280 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

REVELS, JEROME – DISTRICT ATTORNEY INVESTIGATOR

ROGERS, R. – LVMPD P#2858

SAHOTA, ERIC – LVMPD P#9932 (or designee): LATENT PRINT EXAMINER II - Expert in the science and techniques of fingerprint comparison, and comparisons done in this case and any reports prepared therefrom.

SCOTT, ASHLEY – 2645 SHERWOOD ST., #11, LVN 89109

SEAMAN-KELLY, JAN – LVMPD P#5666 (or designee): FIREARMS/TOOLMARK EXAMINER with the Las Vegas Metropolitan Police Department. She is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

SHELL, ELIZABETH – 1918 PINEDALE AVE., MEMPHIS, TN 38127

SIMS, DR. LARY - A medical doctor, employed by the Clark County Coroner's Office as the Chief Medical Examiner/Forensic Pathologist. He is an expert in the area of forensic

pathology and will give scientific opinions related thereto. He is expected to testify regarding the cause and manner of death of NATHAN RAWLS.

STONE, RANDALL - LVMPD P#2887 (or designee): FORENSIC LAB MANAGER with the Las Vegas Metropolitan Police Department. He is an expert in the field of firearm and toolmark comparisons and is expected to testify thereto.

TAYLOR, ERINMARIE - LVMPD P#9619 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

THOMAS, JENNIFER – LVMPD P#10074 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

THOMAS, KRISTINA – LVMPD P#13574 (or designee): CRIME SCENE ANALYST: Expert in the identification, documentation, collection and preservation of evidence and is expected to testify as an expert to the identification, documentation, collection and preservation of the evidence in this case.

THOMAS, LAROY – 2655 SHERWOOD ST., #18, LVN 89109

to testify thereto.

VIDA, BEATA – LVMPD P#14279 (or designee): Expert in the field of DNA extractions, comparisons, analysis, and the identification of bodily fluids and is expected to testify thereto.

WATTS, JOE – DISTRICT ATTORNEY INVESTIGATOR

STEVEN B. WOLFSON
District Attorney
Nevada Bar #001565

BY /s//DANIELLE K. PIEPER
DANIELLE K. PIEPER
Chief Deputy District Attorney
Nevada Bar #008610

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that service of State's Notice, was made this 6th day of January, 2014, by Electronic Filing to:

DAVID J. OTTO, ESQ.
E-mail Address: davidottolaw@yahoo.com

Shellie Warner
Secretary for the District Attorney's Office

mmw/GANG

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/30/10

Name: Tiffany Adams P#: 10072 Classification: Forensic Scientist II

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology	X	Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Quality Assurance		Technical Support / AFIS	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
Cedar Crest College	8/1998 – 5/2002	Genetic Engineering	B.S.
Harrisburg Area Community College	1/2004 – 5/2004	N/A	N/A

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Technology Transition Workshop MinElute Post-PCR Cleanup	Tampa, FL	09/14-09/15/09
GeneMapper ID-X Training	Las Vegas, NV	07/29-07/31/09
Annual Review of DNA Data Accepted at NDIS	Las Vegas, NV	01/13/09
Hair Analysis Training	Las Vegas, NV (online)	2008
Forensic Biology Screening (workshop)	Las Vegas, NV	2007
Applied Statistics (workshop)	Las Vegas, NV	2007
18th International Symposium on Human Identification	Hollywood, CA	2007

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Courtroom Statistics (workshop)	San Diego, CA	2006
Bode Technology Advanced DNA Technology Meeting	San Diego, CA	2006
Expert Witness Testimony (workshop)	St. Louis, MO	2005
Midwestern Association of Forensic Scientists Annual Meeting	St. Louis, MO	2005
Hair Examination for DNA Analysts (workshop)	Wilmington, DE	2004
Mid-Atlantic Association of Forensic Scientists Annual Meeting	Wilmington, DE	2004

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
Grand Jury – Nevada (Clark County)	DNA	1
District Court – Nevada (Clark County)	DNA	1
State Attorney 11th Circuit – Miami-Dade	DNA	1

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist II (Biology/DNA)	2007-Present
Bode Technology	Forensic DNA Analyst II	2003-2007
PSU College of Medicine/Milton S. Hershey Medical Center	Research Technician II	2002-2003
RheoGene/Rohm & Haas	Lab Assistant/Intern	2000-2002

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
None	

PUBLICATIONS / PRESENTATIONS:

"DNA Laboratory Bailout: No-Cost Methods for Improving Productivity"
(Poster Presentation: 2010 Annual Meeting of the American Academy of Forensic Sciences)

PUBLICATIONS / PRESENTATIONS:
"Effects of Sodium Selenite and Organoselenium Compounds on Microtubule Polymerization" (Poster Presentation: 2002 Annual Meeting of the Pennsylvania Academy of Science)
OTHER QUALIFICATIONS:
None

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/25/10

Name: Kathryn Aoyama P#: 8025 Classification: Forensic Scientist I

Current Discipline of Assignment: Latent Prints

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints	X	Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION

Institution	Dates Attended	Major	Degree Completed
University of California, San Diego	9/84 to 6/89	Biology	B.A.
University of Nevada, Las Vegas	8/83 to 5/84	Biology	None

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	Location	Dates
ASCLD /LAB International Preparation Course	Henderson, NV	12/01-12/03/09
Nevada State IAI Tristate Conference – IND/Zn Workshop	Las Vegas, NV	10/07/09
Latent Print Certification Preparation	Las Vegas, NV	06/08-06/10/09
Analysis of Distortion in Latent Prints	Las Vegas, NV	02/09-02/10/09
GWS-L Latent User Methods and Operations	Las Vegas, NV	09/17-09/18/08
RUVIS Training	Las Vegas, NV	8/6/2008
Application of Statistics to Ridgeology And ACE-V Methodology	Las Vegas, NV	3/31-4/04/08
Witnessing 101 - Clark County DA's Office	Las Vegas, NV	5/9/08

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	**Location**	**Dates**
Application of Statistics to Ridgeology and the ACE-V Methodology	Las Vegas, NV	3/31 to 4/4/08
Forensic Photography	Las Vegas, NV	2/11-2/13/08
24-Hour Application Study in Forensic Photography	Las Vegas, NV	02/14/08
Forensic Digital Imaging	Las Vegas, NV	1/7/08 - 1/10/08
2007 2nd Tri-Division IAI Educational Conference	Salt Lake City, UT	11/6/07 - 11/9/07
IAI 92nd International Educational Conference	San Diego, CA	7/23/07 - 7/27/07
Driver=s Training	Las Vegas, NV	7/3/07
2006 1st Tri-Division IAI Educational Conference	Henderson, NV	8/21/06 - 8/24/06
Forensic Photography II	Las Vegas, NV	1/06 - 5/06
Testifying in Court	Las Vegas, NV	11/30/05
Problem Solving, Independent Decision Making	Las Vegas, NV	8/10/05
Effective Interpersonal Communication	Las Vegas, NV	6/23/05
Searching Public Records Part I and II	Las Vegas, NV	3/2/05 - 3/3/05
Criminal Law for Civilians	Las Vegas, NV	11/4/04
Forensic Photography I	Las Vegas, NV	8/04 - 12/04
Forensic Science 101 and 201, American Institute of Applied Science	NC	8/03 - 5/04

COURTROOM EXPERIENCE		
Court	**Discipline**	**Number of Times**
Las Vegas, NV District Court 7	Latent Prints	2
Las Vegas, NV District Court 6	Latent Prints	1

EMPLOYMENT HISTORY		
Employer	**Job Title**	**Date**
Las Vegas Metropolitan Police Department	Forensic Scientist I - Latent Prints	4/08 to present

[Forensic Rev. 1, 6/01]

EMPLOYMENT HISTORY		
Employer	**Job Title**	**Date**
Las Vegas Metropolitan Police Department	Forensic Scientist Trainee - Latent Prints	3/07 to 4/08

PROFESSIONAL AFFILIATIONS	
Organization	**Date(s)**
International Association for Identification (IAI)	7-10-07 to present

PUBLICATIONS / PRESENTATIONS:
Presentations:
05/04/10 Poster Presentation: Latent Prints from Firearms Evidence (Statistics 2008-2009), Association of Firearms & Tool Mark Examiners Training Seminar, Henderson, NV
06/11/08 "Historical and Scientific Development of Latent Print Methodologies", LVMPD, Las Vegas, NV
1/16/08 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV
11/7/07 "Back to Basics - The Biological Basis for Latent Print Examination", 2nd Tri-Division IAI Educational Conference, Salt Lake City, UT
08/21/07 "Disguising and Disrupting Fingerprints", LVMPD, Las Vegas, NV
08/07/07 "Distortion in Latent Prints", LVMPD, Las Vegas, NV
06/14/07 "Ridge Flows and Crease Patterns of the Hands and Feet", LVMPD, Las Vegas, NV
OTHER QUALIFICATIONS:
None

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 07/15/10

Name: Jennifer Bas P#: 9944 Classification: DNA Technical Leader

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology	X	Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Quality Assurance		Technical Support /	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
Hamline University	09/1994 - 06/1995	General	N/A
University of Minnesota	09/1996 - 06/1999	Genetics and Cell Biology	B.S.
George Washington University	09/2002 - 12/2003	Forensic Molecular Biology	M.F.S.

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Y-STR Workshop	Huntington, WV	04/19-04/23/2010
20th International Symposium on Human Identification	Las Vegas, NV	10/12-10/15/2009
Validation of New Techniques and Assays in HID	Las Vegas, NV	10/12/2009
Presenting DNA Evidence in Court	Las Vegas, NV	10/12/2009
Hair Evaluation for DNA Analysts (online course)	Las Vegas, NV	12/2008
Kinship Calculations/Familial Searches	Captiva Island, FL	05/20/2008

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Interpretation and Statistics on Mixture Analysis Workshop	Captiva Island, FL	05/20/2008
7th Annual Advanced DNA Technical Workshop – East	Captiva Island, FL	05/18-05/22/2008
FBI DNA Auditor Training Workshop	Captiva Island, FL	05/18-05/19/2008
Gene Mapper ID-X – Next Generation Forensic Data Analysis Software and Expert System	Online Webinar	04/14/2008
Introduction to Firearm Safety	LVMPD Laboratory	10/24/2007
Forensic Biology Screening Workshop (NFSTC)	Las Vegas, NV	10/15 - 10/19/2007
18th International Symposium on Human Identification	Hollywood, CA	10/01 - 10/04/2007
Applied Statistics Workshop	Hollywood, CA	10/01/2007
17th International Symposium on Human Identification	Nashville, TN	10/2006
Advanced Statistics Workshop	Nashville, TN	10/2006
California Association of Criminalists Meeting	Concord, CA	05/2006
DNA Workshop	CAC – Concord, CA	05/2006
MAAFS Annual Training Conference	Pittsburgh, PA	05/2005
Expert Witness Workshop	MAAFS - Pittsburgh, PA	05/2005
2nd Annual Advanced DNA Technology Workshop - West	San Diego, CA	04/2005
AAFS, MAAFS, SAAFS	Combined Meeting - Orlando, FL	09/2004
Hair Analysis for DNA Analysts Workshop	Combined Meeting - Orlando, FL	09/2004
Population Genetics and Statistics Seminar	AFDIL - Rockville, MD	01/2004
COURTROOM EXPERIENCE		

Court	*Discipline*	*Number of Times*
Grand Jury (Clark County, NV)	Forensic Biology & DNA Analysis	4
Clark County Justice Court, NV	Forensic Biology & DNA Analysis	2
Clark County District Court, NV	Forensic Biology & DNA Analysis	9

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist II	05/07 - Present
Armed Forces DNA Identification Laboratory	Forensic Scientist II	11/05 - 04/06
Armed Forces DNA Identification Laboratory	Forensic Scientist I	01/04 - 11/05

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
American Academy of Forensic Sciences - Associate Member	2005 - Pres.

PUBLICATIONS / PRESENTATIONS:

"DNA Laboratory Bailout: No-Cost Methods for Improving Productivity" (Poster) Tiffany A. Adams, Kristina M. Paulette, Jennifer L. Zimdars Bas. Presented at 62nd Annual Scientific Meeting of the American Academy of Forensic Sciences – Seattle, WA February 22-27, 2010

"Development and Validation of the AmpFℓSTR® MiniFiler™ PCR Amplification Kit: a MiniSTR multiplex for the analysis of degraded and/or PCR inhibited DNA" Journal of Forensic Sciences 2008 Jul; 53(4) 838-852

"Evaluation of the Applied Biosystems AmpFℓSTR® MiniFiler™ PCR Amplification Kit" (POSTER) Jennifer L Zimdars, MFS; Timothy P McMahon, PhD; Demris A Lee, MFS; Maj Louis N. Finelli, MC, USA. Presented at the 17th International Symposium on Human Identification - Nashville, TN 10/2006

OTHER QUALIFICATIONS:

None

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 07/06/10

Name: Frances E. Beaudette P#: 4361 Classification: Forensic Scientist II

Current Discipline of Assignment: Biology / DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances	X	Blood Alcohol	X
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X

EDUCATION

Institution	Dates Attended	Major	Degree Completed
University of Florida, Gainesville	5/04 - 8/04	undeclared	non-degree
University of Nevada, Las Vegas	08/02 - 12/02	undeclared	non-degree
University of Nevada, Las Vegas	8/98 - 5/99	undeclared	non-degree
University of Illinois	9/75 - 6/76, 1/78	undeclared	non-degree
Holy Cross Hospital School of Medical Technology	7/76 - 7/77	Medical Technology	Diploma
University of Illinois	9/71 - 6/75	Biological Sciences	BS

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	Location	Dates
ABI 7500 Software Upgrade	Las Vegas, NV	02/03/10
Annual Review of DNA Data Accepted at NDIS	Las Vegas, NV	01/15/10
GeneMapper ID-X Training, Advanced	Las Vegas, NV	07/29-07/31/09
GeneMapper ID-X Training, Basic	Las Vegas, NV	07/28/09
Hair Evaluation for DNA Analysis	Las Vegas, NV	01/14/09

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	**Location**	**Dates**
Annual Review of DNA Data Accepted at NDIS	Las Vegas, NV	12/30/08
14th National CODIS Conference	Crystal City, VA	11/10-11/12/08
19th International Symposium on Human Identification	Hollywood, CA	10/13-10/16/08
Biomek Methods Programming	Schaumberg, IL	08/27-08/28/08
Biomek Fundamentals	Schaumberg, IL	08/26/08
Qiagen EZ1 Training	Las Vegas, NV	08/12/08
GeneMapper IDX Software Training	Las Vegas, NV	05/29/08
Troubleshooting Electrophoresis and Amplification	Las Vegas, NV	05/29/08
Quantifiler DUO and 7500 Real Time PCR System HID Operator Training	Las Vegas, NV	05/28/08
Annual Review of DNA Data Accepted at NDIS	Las Vegas, NV	01/22/08
Applied Biosystems Training on 3130XL Genetic Analyzer	Las Vegas, NV	11/01/07
Combined DNA Index System (CODIS) Training	Las Vegas, NV	09/10/07-09/14/07
Medicolegal Investigation of Death-Wayne St. Univ.	Las Vegas, NV	11/29/06-12/01/06
Complex Mixture Interpretation	Denver, CO	08/29/06-08/31/06
Differential Extraction Technique	Las Vegas, NV	06/06
Serological Techniques and DNA Screening - Colleen Proffitt, MFS	Las Vegas, NV	05/06
Implementing Automation in the Lab - Promega	Grapevine, TX	09/05
Presenting DNA Evidence in Court - Promega	Grapevine, TX	09/05
Accommodating the Demands of Increasing Volume - Promega	Grapevine, TX	09/05
16th International Symposium on Human Identification - Promega	Grapevine, TX	09/05

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	**Location**	**Dates**
Genemapper ID v.3.2 Software Training - Applied Biosystems Instructor: Jaime Handelsman	Las Vegas, NV	01/05
Basic Forensic Serology - Serological Research Institute (SERI)	Richmond, CA	12/04
Low Copy Number DNA Analysis &Sample Screening	Phoenix, AZ	10/07/04
15th International Symposium on Human Identification-Promega	Phoenix, AZ	10/05/04-10/07/04
Parentage & Mixture Statistics	Phoenix, AZ	10/04/04
Internal Audit Training	Las Vegas, NV	09/22/04
Mammalian Molecular Biology	University of FL	Summer 2004
Forensic DNA Training Program - LVMPD	Las Vegas, NV	4/06/04 - 3/01/05
ABI 7000 & 3100 Installation & Maintenance - UNLV	Las Vegas, NV	05/04
GC Headspace - HS/110 Training	Las Vegas, NV	01/04
CA. Assn of Toxicologists Quarterly Meeting & Workshop on Drugs and Driving	Los Angeles, CA	11/03
CA. Assn of Toxicologists Quarterly Meeting & Workshop on DUI Alcohol	Santa Rosa, CA	08/03
Microsoft PowerPoint	Las Vegas, NV	12/02
Alcohol Kinetics - Future Directions in Forensic Biology - SWAFS	Scottsdale, AZ	11/02
Southwest Assn. of Forensic Scientists Meeting	Scottsdale, AZ	11/4-11/7/02
Immunology	UNLV	Fall 2002
TotalChrom Principles of Operation	Atlanta, GA	10/01
Digital Imaging Workshop	Las Vegas, NV	9/01
Access 2000 Basic	Las Vegas, NV	7/01

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	**Location**	**Dates**
Entomological Evidence from the Death Scene - MAFS	Chicago, IL	10/00
STR Instrumentation - MAFS	Chicago, IL	10/00
Introduction to Head-space Gas Chromatography - MAFS	Chicago, IL	10/00
New Mass Spectroscopic Techniques - MAFS	Chicago, IL	10/00
Midwest Association of Forensic Scientists Meeting	Chicago, IL	10/00
Adrenal and Pituitary Function	Colorado Assn for Continuing Medical Laboratory Education	1999 - Winter
Arson Accelerant Detection	Sacramento, CA	10/99
Meetings of the Midwestern Association of Forensic Scientists - MAFS	Cape Girardeau, MO	10/99
Mitochondrial DNA & STR Interpretation	Cape Girardeau, MO	10/99
General Capillary Electrophoresis Theory and Instrumentation	Cape Girardeau, MO	10/99
Capillary electrophoresis Applications and Techniques in Forensic Drug Analysis	Cape Girardeau, MO	10/99
Blood Alcohol Analysis	LVMPD - OJT	7/99
Statistics for Scientists	UNLV	1999 - spring
Molecular Medicine	Colorado Assn. for Continuing Medical Laboratory Education	1998 - Winter
Botanical Drugs Analysis-MAFS Workshop	Ann Arbor, MI	10/98
Steroid Analysis - MAFS Workshop	Ann Arbor, MI	10/98
Meetings of the Midwestern Association of Forensic Scientists - MAFS	Ann Arbor, MI	10/98
Human Genetics	UNLV	1998 - Fall
Meetings of the American Academy of Forensic Sciences	San Francisco, CA	2/98

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	**Location**	**Dates**
NWAFS/SWAFS/CAT/SAT meetings	Las Vegas, NV	11/97
Interpretation of Mass Spectra	MAFS Workshop and Hewlett Packard Workshop	10/97 and 11/97
MAFS meetings	Des Moines, Iowa	10/97
Introduction to Medical Ethics	Colorado Assn. For Continuing Medical Laboratory Education	Summer 1997
Justice Trax	LVMPD - Training Bureau	12/96
Ace Computer System	LVMPD - Evidence Vault	12/96
ODV Narcotics Identification	LVMPD - Training Bureau	8/96
Testing for Drugs of Abuse	Colorado Assn. for Continuing Medical Laboratory Education	Spring 1996
GC-MS (DOS) Data Analysis / Reporting	Hewlett-Packard,San Diego, CA	12/95
ASCLD Accreditation Workshop	Denver, CO	10/95
Introduction to Therapeutic Drug Monitoring	Colorado Assn. for Continuing Medical Laboratory Education	Spring 1995
Immuno Assay Techniques	Colorado Assn.. for Continuing Medical Laboratory Education	Fall 1994
Introduction to Lotus 1-2-3	Clark County	10/93
Forensic Chemist Seminar	DEA, McClean, VA	9/93
Chromatographic Methods in Forensic Sciences	FBI Academy, Quantico, VA	8/93
Blood Alcohol Analysis	LVMPD - OJT	11/92 - 12/92

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	**Location**	**Dates**
Controlled Substances - Analysis	LVMPD - OJT	4/92 - 6/92
Forensic Chemistry and Toxicology	Associated Pathologist Laboratory of Las Vegas	Fall 1990

COURTROOM EXPERIENCE		
Court	**Discipline**	**Number of Times**
U.S. District Court - Nevada	Controlled Substances	5
U.S. District Court - Nebraska	Controlled Substances	1
Nevada District Court, 8th District	Controlled Substances	25
Nevada District Court, 8th District	DNA	4
Nevada District Court, 5th District	Controlled Substances	4
Nevada District Court, Juvenile Div	Controlled Substances	3
Grand Jury, Clark County	DNA	3
Grand Jury	Controlled Substances	2
Justice Court, Las Vegas	Controlled Substances	24
Justice Court, Tonopah	Controlled Substances	2
Justice Court, Beatty	Controlled Substances	4
Justice Court, Henderson	Controlled Substances	2
Justice Court, Pahrump	Controlled Substances	3
Justice Court, Goldfield	Controlled Substances	1
US District Court, Nevada	Blood Alcohol	3
Nevada District Court, 8th District	Blood Alcohol	3
Justice Court, Las Vegas	Blood Alcohol	0
Muni Court, Las Vegas	Blood Alcohol	7

COURTROOM EXPERIENCE		
Court	**Discipline**	**Number of Times**
Grand Jury, Clark County	Blood Alcohol	1
Muni Court, Henderson	Blood Alcohol	1
Dept. Motor Vehicles, Las Vegas	Blood Alcohol	25
Nevada District Court, 5th District	Blood Alcohol	5
Justice Court, Pioche, NV	Blood Alcohol	1

EMPLOYMENT HISTORY		
Employer	**Job Title**	**Date**
LVMPD Forensic Laboratory; Las Vegas, NV	Criminalist II	4/92 - Present
Associated Pathologist Laboratory, Las Vegas, NV	Supv. Technologist	4/89 - 3/92
State of Nevada, Public Health Laboratory	Microbiologist Supervisor	1/87 - 4/89
Rush Presbyterian St. Luke's Medical Center; Chicago, IL	Supv. Technologist	7/77 - 11/86
Holy Cross Hospital; Chicago, IL	Phlebotomist / Lab Technician	8/76 - 7/77

PROFESSIONAL AFFILIATIONS	
Organization	**Date(s)**
Midwestern Association of Forensic Scientists	10/92

PUBLICATIONS / PRESENTATIONS:

PUBLICATIONS / PRESENTATIONS:
Presumptive Identification of Methamphetamine using ODV Narco Pouch ® Field Test Reagents, October 1997 - CAT/NWAFS/SWAFS/SAT meetings

OTHER QUALIFICATIONS:	
Professional Licenses:	
American Society of Clinical Pathologists, Registry #MT118248	8/77
State of Nevada Clinical Laboratory Technologist #003738	12/86

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 07/07/10

Name: Marnie Carter P#: 8179 Classification: Forensic Scientist II

Current Discipline of Assignment: Latent Prints

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints	X	Crime Scene Investigations	X
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION			
Institution	*Dates Attended*	*Major*	Degree Completed
Drury College	08/97 – 12/99	Biology/Chemistry	B.A.
Nicholls State University	08/91 – 12/93		N/A

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Became a Certified Latent Print Examiner	Las Vegas, NV	12/09
Paper (Chemical Processing) – Indane Dione, Oilredo, and Physical Developer IAD Tri-Division Conference	Las Vegas, NV	10/08/09
Analysis of Distortion in Latent Prints	Las Vegas, NV	02/09/09-02/10/09
GWS-L Latent User Methods and Operations	Las Vegas, NV	09/15/08-09/16/08
RUVIS Training (George Setola; SPeX)	Las Vegas, NV	08/06/08
Application of Statistics to Ridgeology And ACE-V Methodology	Las Vegas, NV	03/31/08-04/04/08

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Forensic Ridgeology	Las Vegas, NV	02/18/08-02/22/08
24-Hour Application Study in Forensic Photography	Las Vegas, NV	02/14/08
Forensic Digital Imaging	Las Vegas, NV	01/07/08-01/10/08
Forensic Imaging Techniques	Las Vegas, NV	01/07/08-01/09/08
Finding Latent Evidence with Chemistry and Light	Henderson, NV	12/11/07-12/14/07
Advanced Palm Prints Comparison Techniques	Fresno, CA	11/13/07-11/15/07
92nd IAI Conference	San Diego, CA	07/22/07-07/26/07
RAM Chemical Processing and Photography	LVMPD (Forensic Lab)	01/03/07
Firearms Qualification -2nd, 3rd, 4th Quarter	LVMPD	2006
2006 Disciplinary Decision Guide Briefing	LVMPD - UMLV	12/06/06
Death in Infancy & Childhood - Investigation & Pathology Seminar (Instructor: Dr. Tracy Corey, Chief Medical Examiner for the State of Kentucky)	Clark County Coroner's Office	11/16/06-11/17/06
Respirator Recertification - "Clandestine Laboratory Safety/ Annual Refresher Course"	LVMPD	10/25/06
"Courtroom Demeanor" (Instructor: DA Bill Berrett)	LVMPD (DA's Office)	09/27/06
"DA Screening" (Instructor: DA Frank Ponticello)	LVMPD (DA's Office)	09/13/06
Presumptive Standards (Instructor: Shannon Merges)	LVMPD	07/19/06
Incident Command System 100LE	LVMPD - UMLV	06/21/06
Firearms Investigations	LVMPD	05/21/06
Bloodstain Pattern Recognition and Examination of Bloodstained Clothing Workshop	LVMPD	05/10/06
Defensive Tactics (Instructor: Luis Norris, P#5104)	LVMPD	03/15/06
Bloodstain Pattern Recognition - Instructor: Craig C. Moore, Niagara Regional Police Service (Canada)	LMVPD	01/16/06-01/20/06

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Merging Digital Photography/Crime Scene Investigations (Instructor: Mike Perkins)	LVMPD	12/07/05
Terrorism Jeopardy, Part 1	LVMPD - UMLV	11/09/05
Completion of Proficiency Exercise - "Recording Major Case Prints"	LVMPD	11/09/05
Plague	LVMPD (UMLV)	08-25-05
National Incident Management System (NIMS)	LVMPD (UMLV)	08/19/05
Digital Workstation Training (Sheree Norman, CSI Training Coordinator Assistant)	LVMPD	07/05
Handling Bomb Threats	LVMPD (UMLV)	05/06/05
An Introduction to the Physical Makeup of Blood	NSDIAI, 5th Annual Educational Conference	03/22/05-03/24/05
Homicide Issues: A Prosecutor's Perspective on Presenting Cases to a Jury	NSDIAI, 5th Annual Educational Conference	03/23/05
DNA - Analysis of Biological Evidence	NSDIAI, 5th Annual Educational Conference	03/24/05
Crime Scene Technology 2: A Crime Scene Practicum	Institute of Applied Forensic Technology	03/14/05-03/18/05
Practical Homicide Investigation	P.H.I Investigative Consultants, Inc.	03/07/05-03/09/05
Smallpox	LVMPD (UMLV)	03/05/05
Biological Terrorism	LVMPD (UMLV)	03/05/05
Clandestine Laboratory Safety Certification	LVMPD	02/23/05-02/25/05
Testifying in Court	LVMPD	12/11/04
Understanding Death & Grief Issues	LVMPD	12/08/04
Active Member # 20649 (International Association for Identification)	IAI	10/12/04
Forensic Science 101	American Institute of Applied Science	10/08/04

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
NV State Division of IAI	NSDIAI	07/27/04
Forensic Photo Techniques	NSDIAI	04/07/04
Lifting Prints off Textured Surfaces	NSDIAI	04/07/04
Defensive Tactics - CSA's	LVMPD	02/02/04
Civilian Use of Force & Firearm Training	LVMPD	02/03/04-02/05/04
Orientation for Civilian Employees - Advanced Training	LVMPD	01/22/04-01/30/04
Criminal Law (Capt. T. Hawkins)	LVMPD	12/04/03
Law Enforcement Response to Alzheimer's (Elderly Abuse/Neglect)	LVMPD	12/04/03
Driver's Training	LVMPD	12/01/03

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
Grand Jury	Latent Prints	1
District Court, Clark County	Latent Prints	2
District Court, Clark County	Crime Scene Analyst	12
Grand Jury	Crime Scene Analyst	2
Justice Court, Las Vegas	Crime Scene Analyst	2

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
LVMPD	Forensic Scientist II	03/10 - Present
LVMPD	Forensic Scientist I	03/07 - 03/10
LVMPD	CSA II	11/05 - 03/07
LVMPD	CSA I	11/03 - 11/05

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
International Association For Identification (IAI)	10/2004
Nevada State Division of IAI (NSDIAI)	07/2004

PUBLICATIONS / PRESENTATIONS:
10/06/09-10/08/09 "Fingerprint Alterations – Disguised, Obliterated, And Mutilated", IAI Tri-Divisional Conference, Las Vegas, NV
09/16/09-09/23/09 Latent Print Training – To LVMPD Gang Unit, Las Vegas, NV
09/22/09-09/23/09 Latent Print Training – To LVFR Arson/Bomb Squad, Las Vegas, NV
01/09/09 "Crime Scene Investigations" Criminalistics Class, Advanced Technologies Academy, Las Vegas, NV
09/22/08 "Latent Print Evidence" LVMPD CSA Academy, Las Vegas, NV
09/08/08-09/09/08 "Ridge Flows and Cease Patterns of the Palms", LVMPD Fo/ensic Laboratory, Las Vegas, NV
9/3/08 "Ridge Flows and Cease Patterns of the Palms", Civil Fingerprinting, Las Vegas, NV
6/11/08 "Historical and Scientific Development of Latent Print Methodologies", LVMPD, Las Vegas, NV
03/08 "Latent Print Evidence", CSA Academy, LVMPD, Las Vegas, NV
11/06/07 "Back to Basics: Ridge Flows and Creases of Hands and Feet" Arizona/Nevada/ Utah Tri-State IAI Conference, Salt Lake City, Utah
11/06/07 "Who Moved My Latent?: Disguised Fabricated and Forged Fingerprints" Arizona/Nevada/ Utah Tri-State IAI Conference, Salt Lake City, Utah
08/21/07 "Disguising and Disrupting Fingerprints", LVMPD, Las Vegas, NV
08/07/07 "Distortion in Latent Prints", LVMPD, Las Vegas, NV
06/14/07 "Ridge Flows and Crease Patterns of the Hands and Feet", LVMPD, Las Vegas, NV
05/23/07 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV

OTHER QUALIFICATIONS:
Certified Latent Print Examiner – IAI, Dec. 2009

Las Vegas Criminalistics Bureau
Statement of Qualifications

Name: Michael Cromwell P# 13203 Date: 06-22-10

CURRENT CLASSIFICATION

	Classification	*Minimum Qualifications*
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

Institution	*Major*	*Degree/Date*
University of Central Florida	Forensic Science w/Chemistry Minor	Bachelor of Science/May 2007
Seminole Community College	General Education	Associates/May 2004

TESTIMONY

Yes	*No*	
X		Clark County, NV – Justice Court
X		Clark County, NV – District Court

EMPLOYMENT HISTORY

Employer	*Title*	*Date*
LVMPD	CSA II	03-10-10 to Present
LVMPD	CSA I	03-10-08 to 03-10-10
Baltimore County Police Dept Forensic Services Section	Intern	01/07 - 02/08
University of Central Florida Department of Chemistry	Research Technician	05/06 - 12/06

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 02-22-11

Name: Jonathan A. Fried P#: 8174 Classification: Forensic Scientist Trainee

Current Discipline of Assignment: Firearms/Toolmarks

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	X
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION			
Institution	*Dates Attended*	*Major*	Degree Completed
University of New Haven	1999 – 2001	Forensic Science --Advanced Investigations	M.S.
Sacred Heart University	1994 – 1998	Computer Science – Information Systems	B.S.

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Basic Shooting Reconstruction Course	Las Vegas, NV	01/24/11-01/26/11
ATF Serial Number Restoration Course	Las Vegas, NV	9/27-9/29/2010
Colt .45/Model "O" 1911 Armorer's School	Las Vegas, NV	8/5-6/2010
Colt M16/AR-15 Rifle Armorer's School	Las Vegas, NV	8/2-4/2010
LAR Manufacturing Factory Tour	West Jordan, UT	7/14/2010
North American Arms Factory Tour	Provo, UT	7/13/2010
Barnes Bullets Ammunition Factory Tour	Mona, UT	7/13/2010
Sig Sauer Classic Pistols Armorer's School	Las Vegas, NV	7/7-8/2010

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Sturm Ruger Firearms Factory Tour	Prescott, AZ	6/19/2010
Dillon Precision Reloading Factory Tour	Scottsdale, AZ	6/18/2010
Schneider Rifle Barrels Factory Tour	Payson, AZ	6/18/2010
NIBIN Entry	LVMPD-Criminalistics	6/24/2010
Benelli M1, M2, M4 Armorer's School	Las Vegas, NV	6/16-17/2010
Beretta 90 Series and Px4 Armorer's School	Las Vegas, NV	6/14-15/2010
AFTE Annual Training Seminar	Henderson, NV	5/2-7/2010
Innov-x XRF Safety and Operator Training	LVMPD-Criminalistics	4/8/2010
ATF IBIS Data Acquisition Training	Largo, FL (FTI)	6/24-29/2010
Glock Armorer's School	Las Vegas, NV	1/20/2010
2009 Clan Lab Recert	LVMPD-Criminalistics	5/27/2009
Detecting Staged Crime Scenes	LVMPD-ISD	5/5/2009
Basic Instructor Development	LVMPD-Advanced Training	4/2009
Integrated Ballistic Identification System	West Virginia University Extended Learning	4/17/2009
Introduction to Firearms and Toolmarks	West Virginia University Extended Learning	4/17/2009
Hexagon OBTI Blood Test	Las Vegas, NV	3/11/2009
Crime Scene and DNA Basics for Forensic Analysts	Las Vegas, NV	3/4/2009
What Every Law Enforcement Officer Should Know About DNA Evidence: Investigators and Evidence Techs	Las Vegas, NV	3/4/2009
Communication Skills, Report Writing, and Courtroom Testimony for Forensic Analysts	Las Vegas, NV	3/4/2009
Collecting DNA Evidence at Property Crime Scenes	Las Vegas, NV	2/28/2009
EEOC Basics Class	Las Vegas, NV	2/25/2009
NCIC Recertification	Las Vegas, NV	1/29/2009
Nevada Workplace Safety Rights and Responsibilities	Las Vegas, NV	1/20/2009
Advanced Forensic Investigations for Hazardous Environments Performance Level	Las Vegas, NV	10/3/2008
IS-00200 ICS for Single Resources and Initial Action Incidents	Las Vegas, NV	7/30/2008

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
IS-00700 National Incident Management System	Las Vegas, NV	7/30/2008
Introduction of the Incident Command System 1-100 for Law Enforcement	Las Vegas, NV	7/30/2008
Major Case Prints	Las Vegas, NV	5/14/2008
Forensic Entomology Evidence Recovery Techniques	Las Vegas, NV	3/3-4/2008
Ground Penetrating Radar	Las Vegas, NV	1/23-24/2008
Use of Force (Civilians)	Las Vegas, NV	1/2/2008
Finding Latent Evidence with Chemistry & Light	Henderson, NV	12/11-14/2007
Bomb Investigations	Las Vegas, NV	12/5-7/2007
Clandestine Laboratory Safety Re-Certification	Las Vegas, NV	10/24/2007
Forensic Entomology Evidence Collection Protocol	Las Vegas, NV	8/2007
(RT02) NCIC Recertification Phase II	Las Vegas, NV	5/23/2007
ROFIN Polilight PL500 (Instructor: Sheree Norman)	Las Vegas, NV	5/2/2007
Bloodstain Pattern Analysis (10-hour refresher course)	Las Vegas, NV	2/20/2007
Death in Infancy & Childhood - Investigation & Pathology Seminar (Instructor: Dr. Tracy Corey, Chief Medical Examiner for the State of Kentucky)	Las Vegas, NV	11/16-17/2006
Diversity Training	Las Vegas, NV	11/1/2006
Forensic Medical Investigation	Las Vegas, NV	8/16-18/2006
How to be the Best Expert Witness You Can be	Las Vegas, NV	8/9/2006
Presumptive Standards (Instructor: Shannon Merges)	Las Vegas, NV	7/19/2006
Bloodstain Pattern Recognition and Examination of Bloodstained Clothing Workshop	Las Vegas, NV	5/11/2006
Shooting Incident Reconstruction (Basic)	Las Vegas, NV	4/5-7/2006
Bloodstain Pattern Recognition - Instructor: Craig C. Moore, Niagara Regional Police Service (Canada)	Las Vegas, NV	1/120/2006
Basic Bloodstain Pattern Recognition	Las Vegas, NV	1/16-20/2006
Terrorism and Travel Documents	Las Vegas, NV	12/13/2005
Merging Digital Photography/Crime Scene Investigations	Las Vegas, NV	12/7/2005
Completion of Proficiency Exercise - "Recording Major Case Prints"	Las Vegas, NV	11/16/2005

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
FATS Training	Las Vegas, NV	10/5/2005
National Incident Management System (NIMS) -IS-00700	Las Vegas, NV	9/6/2005
Digital Workstation Training	Las Vegas, NV	7/5/2005
Homicide Issues: A Prosecutor's Perspective on Presenting Cases to a Jury	Las Vegas, NV	3/23/2005
Nightime Photography Techniques	Las Vegas, NV	3/23/2005
Excited Delirium and Restraint Deaths	Las Vegas, NV	3/23/2005
Crime Scene Technology 2: A Crime Scene Practicum	North Las Vegas, NV	3/14-18/2005
Practical Homicide Investigation	Las Vegas, NV	3/7-9/2005
Clandestine Laboratory Safety Certification	Las Vegas, NV	2/23-25/2005
Forensic Science Program 101 - Certified	Las Vegas, NV	10/6/2004
Brooke Lee West Case - "Coffin Flies"	Las Vegas, NV	4/7/2004
Bite Marks	Las Vegas, NV	4/7/2004
Nighttime Photographic Techniques	Las Vegas, NV	4/7/2004
Criminallstics Bureau - Field Training	Las Vegas, NV	3/31/2004
Civilian Use of Force & Firearm Training	Las Vegas, NV	2/3-5/2004
Defensive Tactics - CSA's	Las Vegas, NV	2/2/2004
Orientation for Civilian Employees - Advanced Training	Las Vegas, NV	1/22-30/2004
Crime Scene Analyst Academy	Las Vegas, NV	1/15/2004
Testifying in Court	Las Vegas, NV	12/11/2003
WordPerfect 8 - Basic	Las Vegas, NV	12/9/2003
Understanding Death & Grief Issues	Las Vegas, NV	12/8/2003
L.E. Response to Alzheimer Victims, Abuse/Neglect	Las Vegas, NV	12/4/2003
Driver Training	Las Vegas, NV	12/1/2003

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
District Court, Justice Court, Grand Jury	Crime Scene Investigations	12-15
Federal Court	Crime Scene Investigations	1

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist Trainee	10/2009-Present
Las Vegas Metropolitan Police Department	Crime Scene Analyst (I, II, Senior)	11/2003 –10/2009
Stratford Police Department	Police Officer	1/2002 – 11/2003

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
Member of International Association for Identification	Current

PUBLICATIONS / PRESENTATIONS:

Poster Presentations:
"Evaluation of the Forensics Source Short Length Ballistic Fiber Filled Bullet Catcher,"
"Remington HD Ultimate Home Defense 12 Gauge Shot Shell Ammunition,"
"Sub-Caliber Shenanigans," and "Proof of Concept (Preliminary) Results on a Method to Cross Check Chronograph Velocities Using Hi-Speed Video Camera," Association of Firearm and Tool Mark Examiners Annual Training Seminar, May 2010, Henderson, NV

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/28/10

Name: Kellie M. (Wales) Gauthier P#: 8691 Classification: Forensic Scientist II

Current Discipline of Assignment: DNA/Biology

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology	X	Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Quality Assurance		Technical Support /	X

EDUCATION			
Institution	*Dates Attended*	*Major*	Degree Completed
University of West Florida	8/98 - 5/02	Biology	B.S.

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
ASCLD/LAB- International Preparation Course	Henderson, NV	12/01-12/03/09
Cold Case Analysis Training	Chicago, IL	07/15-07/16/09
Hair Evaluation for DNA Analysis	Las Vegas, NV (Online Course)	01/14/09
Annual Review of DNA Data Accepted at NDIS	Las Vegas, NV (Online Course)	11/18/08
Seminar: The Parachute Case	Washington DC	02/22/08
Seminar: Bringing Forensic Science to the Battlefield	Washington DC	02/21/08
Seminar: Human Identification in a Post 9/11 World	Washington DC	02/20/08

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Workshop: DNA Mixture Interpretation	Washington DC	02/19/08
Conference: American Academy of Forensic Sciences 60th Annual Meeting	Washington DC	02/19/08-02/23/08
Annual Review of DNA Data Accepted at NDIS	Las Vegas, NV	01/31/08
Applied Biosystems Training on 3130xl Genetic Analyzer	Las Vegas, NV	11/01/07
Workshop: Forensic DNA Profiling	Las Vegas, NV	01/25-26/07
Workshop: Forensic Population Genetics and Statistics	Las Vegas, NV	11/27/06
FBI CODIS Training	McLean, VA	11/06
Conference: Bode Advanced DNA Technical Workshop	Captiva Island, FL	06/06
Workshop: Presenting Statistics in the Courtroom	Captiva Island, FL	06/06
Training: Differential Extraction	Las Vegas, NV	06/06
Training: Serological Techniques and DNA Screening - Colleen Proffitt, MFS	Las Vegas, NV	5/06
Conference: American Academy of Forensic Sciences 58th Annual Meeting	Seattle, WA	2/20/06-2/25/06
Seminar: Racial Profiling SNP's	Seattle, WA	2/23/06
Seminar: The Atypical Serial Killer	Seattle, WA	2/22/06
Seminar: Bioterrorism Mass Disasters	Seattle, WA	2/21/06
Workshop: Sexual Homicide - Fantasy Becomes Reality	Seattle, WA	2/21/06
Workshop: Advanced Topics in STR DNA Analysis	Seattle, WA	2/20/06
National Incident Management System (NIMS) an Introduction	Las Vegas, NV	8/05
Drivers Training II	Las Vegas, NV	7/05

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Workshop: Future Trends in Forensic DNA Technology - Applied Biosystems	Orlando, FL	9/04
Workshop: Southern Association of Forensic Scientists (SAFS) - Paternity Index DNA Statistics	Orlando, FL	9/04
Workshop: Forensic Epidemiology - Joint Training for Law Enforcement Hazardous Materials and Public Health Officials on Investigative Response to Bio-terrorism	Orlando, FL	7/04
Forensic Technology Training - Florida Department of Law Enforcement	Orlando, FL	4/04
Biology Discipline Meeting	Tampa, FL	3/04
Workshop: Future Trends in Forensic DNA Technology - Applied Biosystems	Orlando, FL	9/03

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
Clark County: Justice, District	DNA	30

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist	5/05 - present
Florida Dept. of Law Enforcement	Forensic Technologist	8/03 - 5/05

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
American Academy of Forensic Sciences - Trainee Affiliate	10/06 - 12/09

PUBLICATIONS / PRESENTATIONS:

None

OTHER QUALIFICATIONS:

None

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/20/2012

Name: Heather Gouldthorpe P#: 8646 Classification: Forensic Scientist

Current Discipline of Assignment: Latent Prints

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Toxicology/Blood Alcohol	
Toolmarks		Toxicology/Breath Alcohol	
Trace Evidence		Toxicology/Drugs	
Arson Analysis		Firearms	
Latent Prints	X	Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support / AFIS	X

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
National University	08/2000-01/2001	Forensic Science	MFS
Bowling Green State University	08/1991-05/1995	Sociology	BA
College of Southern Nevada	08/1998-02/2006	N/A	N/A
Grossmont College	08/2002-12/2002	N/A	N/A
University of Nevada - Las Vegas	08/1996-12/1998	N/A	N/A
University of Akron	06/1993-08/1993	N/A	N/A

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
New Research in Pattern Evidence and Statistical Models – Online	Las Vegas, NV	06/12/12
Analysis of Distortion in Latent Prints	Las Vegas, NV	02/20/12 & 02/22/12

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
25th Annual AFIS Internet User Conference	Henderson, NV	8/29 – 8/31/11
95th IAI International Educational Conference	Milwaukee, WI	8/8 – 8/13/11
2011 NSDIAI Quarterly Training	Las Vegas, NV	07/13/11
Basic Statistics/SWAFS	Dallas, TX	09/24/10
Law and Testimony/SWAFS	Dallas, TX	09/20/10
Forensic Fingerprint Analysis Basics - Online	Las Vegas, NV	08/26/10
History of an Optimized Development 1,2 Indanedione-Zinc Reagent	Las, Vegas, NV	10/07/09
Automated Fingerprint Identification Systems	WVU, Extended Learning Course	04/02/09
Analysis of Distortion in Latent Prints	Las Vegas, NV	02/9-02/10/09
GWS-L Latent user Methods and Operations	Las Vegas, NV	09/17-09/18/08
Application of Statistics to Ridgeology And ACE-V Methodology	Las Vegas, NV	03/31-04/04/08
Forensic Ridgeology	Las Vegas, NV	02/18-22/2008
Forensic Photography	Las Vegas, NV	02/14/2008
Forensic Digital Imaging	Las Vegas, NV	01/07-01/09/2008
Introduction to Firearms Safety	Las Vegas, NV	10/24/2007
Drivers Training	Las Vegas, NV	07/02/2007
87th Annual IAI International Educational Conference	Las Vegas, NV	08/04 - 10/2002
Nevada State Division for the IAI 3rd Annual Educational Conference	Las Vegas, NV	04/11 - 13/2001
Fingerprinting – State of Nevada P.O.S.T. Basic Certification	Las Vegas, NV	04/16/1997

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
District Court, Nevada	Latent Prints	2

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist	03/05/12 - Present
Las Vegas Metropolitan Police Department	Forensic Scientist Trainee	03/05/11 – 03/05/12
Las Vegas Metropolitan Police Department	Forensic Lab Technician	06/02/07 – 03/05/11
Las Vegas Metropolitan Police Department	Law Enforcement Support Technician	02/28/07-06/02/07

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
International Association for Identification (IAI)	2007-present
Southwestern Association of Forensic Scientists (SWAFS)	2010-present

PUBLICATIONS / PRESENTATIONS:
8/31/11 "Thermal Paper Processing" 25th Annual AFIS Internet User Conference, Henderson, NV

OTHER QUALIFICATIONS:
IAI Certified Latent Print Examiner – November 30, 2010

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/28/10

Name: Edward S. Guenther P#: 5891 Classification: Forensic Scientist II

Current Discipline of Assignment: Latent

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints/Shoe Track Analysis	X	Crime Scene Investigations	X
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
University of South Florida	9/82 - 12/84	Criminal Justice	BA
Ohio University	9/77 - 12/79	Criminal Justice	n/a
University of Akron	9/73 - 6/75	Biology	n/a

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
International Association for Identification 94th International Educational Conference	Tampa, FL	08/16/09-08/22/09
GWS-L Latent User Methods and Operations	Las Vegas, NV	09/15/08-09/16/08
Application of Statistics to Ridgeology and ACE-V Methodology	Las Vegas, NV	03/31/08-04/04/08
24-Hour Application Study in Forensic Photography	Las Vegas, NV	02/14/08
Forensic Digital Imaging	Las Vegas, NV	01/07/08-01/10/08
FBI-Universal Latent Workstation Training Program	Phoenix, AZ	09/27/07

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
International Association for Identification - 92nd International Educational Conference	San Diego, CA	7/07
Analysis of Distortion in Latent Prints	Las Vegas, NV	5/07
Ridgeology Science Workshop	Las Vegas, NV	11/06
Paradigm Shift in Forensic Sciences	Las Vegas, NV	11/06
Audit Refresher	Las Vegas. NV	09/04
Nevada State Division of the International Association for Identification - *Death Investigations Role of the Medical Examiner*	Las Vegas, NV	4/04
Nevada State Division of the International Association for Identification - *Digital Imagery*	Las Vegas, NV	4/04
Nevada State Division of the International Association for Identification - *A Friction Ridge Story*	Las Vegas, NV	4/04
Computer Basics	Las Vegas, NV	1/04
NEC / Archive User Methods and Operations	Las Vegas, NV	8/02
International Association for Identification - 87th International Educational Conference	Las Vegas, NV	8/02
NEC AFIS Training / FW21-Latent User Methods and Operations	Las Vegas, NV	7/02
ABFDE Daubert Seminar - The Daubert World - Past, Present and Future	Las Vegas, NV	6/02
Digital Imaging Workshop	Las Vegas, NV	10/01
Digital Imaging Workshop	Las Vegas, NV	9/01
Forensic Identification Training Seminars, LLC - Advanced Ridgeology Comparison Techniques	Las Vegas, NV	1/01
Conducting Performance Audits	Las Vegas, NV	3/00
Digital Enhancement for the ID/Forensic Section	El Cajon, CA	8/99
NFSTC Laboratory Auditing	Las Vegas, NV	6/99
1998 Printrak Users Conference	Anaheim, CA	9/98

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
FDIAI Conference	Palm Beach, FL	10/97
Tire Tracks as Evidence	Panama City, FL	10/96
FDIAI Conference	Panama City, FL	10/96
Latent Print Development Techniques	Tallahassee, FL	11/95
FDIAI Conference	Tampa, FL	10/95
Identification of Vehicles Through Tire Tracks	Tallahassee, FL	5/93
AFIS Training Seminar	Tampa, FL	12/92
Demystifying Palm Prints	Tampa, FL	1/92
FDIAI Conference	Tallahassee, FL	10/91
Advanced Latent Fingerprint Examiners Seminar	Tampa, FL	9/90
Advanced Techniques in Crime Scene Seminar	Tallahassee, FL	3/90
Collection and Preservation of Physical Evidence	Quantico, VA	3/89
Police Arson School	Quantico, VA	4/88
Forensic Identification of Shoe & Tire Prints	Tallahassee, FL	4/88
FDIAI Conference	Stuart, FL	10/87
Forensic Archeology and Anthropology Seminar	Tallahassee, FL	2/87
Forensic Footwear and Tire Track Seminar	Tallahassee, FL	3/86
Basic Crime Scene Training	Tampa & Tallahasse, FL	8/85 - 10/85
International Association for Identification	Savannah, GA	7/85
Bloodstain Evidence Workshop	Tallahassee, FL	3/85
Latent Fingerprint Analyst Seminar	Tallahassee,FL	11/83
International Association for Identification	Orlando, FL	8/83
Identification Photography	Quantico, VA	4/83
Basic Footwear Identification Training	Tallahassee & Tampa, FL	10/81 - 12/82

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Basic Latent Print Training	London, Ohio	2/77 - 5/77
Fingerprint Technician School	FBI - Washington, D.C.	9/75 - 11/75
Forensic Imaging Techniques	Las Vegas, NV	01/08

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
State Courts of Florida, Ohio & Nevada	Latent Prints	>250
Federal Courts of Florida & Nevada	Latent Prints	> 10
State Courts of Florida & Nevada	Shoe Tracks	> 50
Federal Courts of Nevada	Shoe Tracks	1
State Courts of Florida	Crime Scene Analysis	approx 30

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Dept.	Forensic Scientist II	5/98 - current
Florida Department of Law Enforcement	Senior Crime Lab Analyst - Latents, Shoes, Crime Scene	3/80 - 5/98
Ohio Bureau of Criminal Identification and Investigation	Latent Print Examiner	2/77 - 3/80

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
Active member of the International Association for Identification	current
Active member of the Florida Division of the International Association for Identification	1986 - 1998

PUBLICATIONS / PRESENTATIONS:

None

OTHER QUALIFICATIONS:

Certified Latent Print Examiner by the International Association for Identification - expires 12/18/10
(certified since December 1997)

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 10/27/10

Name: Lori J. Haines P#: 9931 Classification: Forensic Scientist I

Current Discipline of Assignment: Latent Prints

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints	X	Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
University of Arizona	6/85 – 6/03	Chemistry	BS

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
95th Annual IAI Educational Conference	Spokane, WA	08/08/10-08/12/10
24th Annual AFIS Internet Inc. Educational Conference	Portland, OR	07/12/10-07/16/10
Sequential Processing of Documents for Fingerprints: Getting All of What's There	Largo, FL	01/25/10-01/26/10
4th Annual Nevada State Chapter of the International Association of Identification, Tri-Division Educational Conference	Las Vegas, NV	10/06/09-10/09/09
NEC Internet AFIS Educational Conference	Sacramento, CA	08/31/09-09/03/09

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Analysis of Distortion in Latent Prints	Las Vegas, NV	02/09/09-02/10/09
NEC AFIS Training - GWS-L Latent user Methods and Operations	Las Vegas, NV	09/17/08-09/18/08
IAI 93rd Educational Conference	Louisville, KY	08/18/08-08/22/08
Application of Statistics to Ridgeology and the ACE-V Methodology	Las Vegas, NV	03/31/08-04/04/08
Forensic Ridgeology	Las Vegas, NV	02/18/08-02/22/08
Forensic Photography Workshop	Las Vegas, NV	02/11/08-02/13/08
Forensic Imaging Techniques	Las Vegas, NV	01/07/08-01/09/08
Finding Latent Evidence with Chemistry and Light – Ron Smith and Associates	Henderson, NV	12/11/07-12/14/07
Advanced Palm Print Comparison Techniques	Fresno, CA	11/13/07-11/15/07
SCAFO 16th Annual Forensic Training Seminar	Riverside, CA	10/01/07-10/02/07
IAI 92nd International Educational Conference	San Diego, CA	07/22/07-07/28/07

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
Eight Judicial District Court	Latent Print Examination	2

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist	3/07-Present
Clark County School District	High School Science Teacher	8/03 - 3/07
Lockheed Analytical Laboratory	Senior Associate Scientist	1/93 - 6/97
Associated Pathologist's Laboratories	Veterinary Lab Technician	1/92 - 1-93

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
International Association of Identification	06/07-present
AFIE Internet Inc.	07/10-present

PUBLICATIONS / PRESENTATIONS:

Presentations:

08/08/10-08/12/10 "How Much Is Enough: Exploring 'Of Value' Decisions and Borderline Latent Print," 24th Annual AFIS Internet User's Group Conference, Portland, OR

07/13/10-07/16/10 "Analysis of Distortion In Latent Prints," 95th IAI Educational Conference, Spokane, WA

07/13/10-07/16/10 "How Much Is Enough: Exploring 'Of Value' Decisions and Borderline Latent Prints," 95th IAI Educational Conference, Spokane, WA

09/02/09 "Things Aren't Always as They Appear – Examining Forged and Fraudulent Fingerprints," 23rd Annual AFIS Internet NEC User's Group Conference, Sacramento, CA

09/01/09 "Examining the NAS Report: A Fingerprint Examiner's Perspective," 23rd Annual AFIS Internet NEC User's Group Conference, Sacramento, CA

09/01/09 "Basic Fingerprint Distortion for the Ten Print Examiner," 23rd Annual AFIS Internet NEC User's Group Conference, Sacramento, CA

09/24/08 " Hidden Evidence – Finding Latent Prints with Chemistry", American Chemical Society Western Regional Conference, Las Vegas, NV

09/08/08-09/09/08 "Friction Ridge Flow and Creases of the Palm Training," LVMPD Forensic Laboratory, Las Vegas, NV

09/03/08 "Creases and Friction Ridge Flow of the Palm," civil Fingerprinting, Las Vegas, NV

08/18/08 "Valid Science or Voodoo – Testing Latent Print Methodology," 93rd IAI Educational Conference, Louisville, KY

12/07 Fingerprint Examination Lecture and Workshop, Forensic Science Class, Shadow Ridge High School, Las Vegas, NV

11/06/07 "Back to Basics: Ridge Flows and Creases of Hands and Feet" Arizona/Nevada/ Utah Tri-State IAI Conference, Salt Lake City, Utah

11/06/07 "Who Moved My Latent?: Disguised Fabricated and Forged Fingerprints" Arizona/Nevada/ Utah Tri-State IAI Conference, Salt Lake City, Utah

Publications:

PUBLICATIONS / PRESENTATIONS:
Merlino, M., Springer,V., Seaman-Kelly, J., Hammond, D., Sahota, E., and **Haines, L**. "Meeting the Challenges of the Daubert Trilogy: Refining and Redefining the Reliability of Forensic Evidence", Tulsa Law Review, 2007, 43(2), p. 417-445.
Branum, G., Sweeney, S., Palmeri, A., Haines, L., and Huber, C. "The Feasibility of the Detection and Quantitation of β-Adrenergic Blockeres by Solid-Phase Extraction and Subsequent Derivatization with Methaneboronic Ac, Journel of Analytical Toxicology, March/April 1998, Vol. 22, Number 2, pp. 135-141.
OTHER QUALIFICATIONS:

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 12/14/10

Name: David Johnson P#: 9933 Classification: Forensic Scientist II

Current Discipline of Assignment: Latent Prints

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints	X	Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION			
Institution	*Dates Attended*	*Major*	Degree Completed
University of California, Riverside	9/99-8/03	Biology	BS

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
NEDIAI 18th Annual Educational Conference	Manchester, VT	11/09/10-11/12/10
Photoshop CS5	Las Vegas, NV	08/31/10
Forensic Fingerprint Analysis Basics	Las Vegas, NV	08/25/10
IAI 95th Educational Conference	Spokane, WA	07/11/10-07/17/10
Paper Chemistry, Oil Red O, and Physical Developer	Las Vegas, NV	10/09/09
The Development of Latent Prints on Porous Surfaces Using 1,2-IND-Zn	Las Vegas, NV	10/08/09
Writing for Publication	Las Vegas, NV	06/17/09

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Probability Based Fingerprint Examination – Fingerprinting in the 21st Century	Las Vegas, NV	06/15/09-06/16/09
Analysis of Distortion in Latent Prints	Las Vegas, NV	02/09/09-02/10/09
GWS-L Latent user Methods and Operations	Las Vegas, NV	09/17/09-09/18/08
IAI 93rd Educational Conference	Louisville, KY	08/17/08-08/23/08
LVMPD Latent Print Training Program	Las Vegas, NV	03/26/07-07/14/08
PNWD-IAI Education & Training Conference	Medford, OR	05/13/08-05/16/08
Witnessing 101	Las Vegas, NV	05/09/08
Application of Statistics to Ridgeology and ACE-V Methodology	Las Vegas, NV	03/31/08 – 04/04/08
Forensic Ridgeology	Las Vegas, NV	02/18/08 – 02/22/08
Forensic Photography	Las Vegas, NV	02/11/08 – 02/13/08
Forensic Imaging Techniques	Las Vegas, NV	01/07/08 – 01/09/08
Finding Latents with Chemistry and Light	Henderson, NV	12/12/07 - 12/15/07
Advanced Palm Print Comparison Techniques	Fresno, CA	11/13/07 - 11/15/07
Introduction to Firearms Safety	Las Vegas, NV	10/24/07
SCAFO Training Seminar	Riverside, CA	10/01/07 – 10/2/07
IAI 92nd Educational Conference	San Diego, CA	7/23/07 - 7/27/07
Driver Training	Las Vegas, NV	07/05/07

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Clark County District Court	Latent Prints	8
Federal Court (Nevada)	Latent Prints	1
Clark County Grand Jury	Latent Prints	1

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
LVMPD Forensic Laboratory	Forensic Scientist II	03/10 – present
LVMPD Forensic Laboratory	Forensic Scientist I	03/08 – 03/10
LVMPD Forensic Laboratory	Forensic Scientist Trainee	03/07- 03/08

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
International Association for Identification (IAI)	2007-present

PUBLICATIONS / PRESENTATIONS:

Presentations:

11/12/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" NEDIAI 18th Annual Educational Conference, Manchester, VT

11/12/10 "Ridge Flows of the Feet" NEDIAI 18th Annual Educational Conference, Manchester, VT

11/11/10 "Aging and Wound Healing of the Skin" NEDIAI 18th Annual Educational Conference, Manchester, VT

10/28/10-10/29/10 "Analysis of Distortion in Latent Prints" San Diego, CA

10/18/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" Indiana IAI 17th Annual Conference, Fort Wayne IN

07/16/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" IAI 95th Educational Conference, Spokane, WA

07/15/10 "Ridge Flows of the Feet" IAI 95th Educational Conference, Spokane, WA

07/15/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" IAI 95th Educational Conference, Spokane, WA

07/13/10 "Ridge Flows of the Feet" IAI 95th Educational Conference, Spokane, WA

07/13/10 "How Much is Enough: Exploring "Of Value" Decisions and Borderline Latent Prints" IAI 95th Educational Conference, Spokane, WA

05/27/10 "Analysis of Distortion in Latent Prints" CSDIAI 20110 Annual Training Seminar, Rancho Mirage, CA

10/08/09 "Ridge Flows of the Feet" 4th Tri-Division Educational Conference, Las Vegas, NV

10/07/09 "Ridge Flows of the Feet" 4th Tri-Division Educational Conference, Las Vegas, NV

PUBLICATIONS / PRESENTATIONS:
9/22/08 "Latent Print Evidence", CSA Academy, LVMPD, Las Vegas, NV
8/22/08 "Ridge Flows of the Feet" IAI 93rd Educational Conference, Louisville, KY
8/21/08 "Ridge Flows of the Feet" IAI 93rd Educational Conference, Louisville, KY
8/19/08 "Ridge Flows of the Feet" IAI 93rd Educational Conference, Louisville, KY
07/21/08-7/25/08 "Ridgeology Science Workshop" Pretoria, South Africa
6/11/08 "Historical and Scientific Development of Latent Print Methodologies", LVMPD, Las Vegas, NV
05/08 "Aging and Wound Healing of the Friction Ridge Skin", PNWDIAI, Medford, OR
05/08 "Disguised and Disrupted Fingerprints", PNWDIAI, Medford, OR
05/08 "Ridge Flows and Crease Patterns of the Feet", PNWDIAI, Medford, OR
05/08 "Analysis of Distortion in Latent Prints", PNWDIAI, Medford, OR
04/08 "Ridge Flows and Crease Patterns of the Feet", SWGFAST, Huntsville, TX
3/08 "Latent Print Evidence", CSA Academy, LVMPD, Las Vegas, NV
1/16/08 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV
8/21/07 "Disguising and Disrupting Fingerprints", LVMPD, Las Vegas, NV
8/7/07 "Distortion in Latent Prints", LVMPD, Las Vegas, NV
6/14/07 "Ridge Flows and Crease Patterns of the Hands and Feet", LVMPD, Las Vegas, NV
OTHER QUALIFICATIONS:
Certified Latent Print Examiner through the International Association for Identification since 9/2009

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 01/25/11

Name: Craig King P#: 9971 Classification: Forensic Scientist II

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology	X	Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Quality Assurance		Technical Support /	

EDUCATION			
Institution	*Dates Attended*	*Major*	Degree Completed
Towson University	9/1996-5/1998	Biology	B.S.

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
HID University 240, Basic GMIDX	Las Vegas, NV	07/28/09
Hair Evaluation for DNA Analysis	Las Vegas, NV	03/16/09
Forensic Biology Screening Workshop-NFSTC	Las Vegas, NV	10/15 - 10/19/07
Promega Workshop-Applied Statistics	Hollywood, CA	10/01/07
18th Internat'l. Symposium on Human Identification	Hollywood, CA	10/01 - 10/04/07
AAFS 59th ANNUAL MEETING	San Antonio, TX	2/07

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Advanced Topics in STR DNA		
AAFS 58th ANNUAL MEETING	Seattle, WA	2/06
AAFS 57th ANNUAL MEETING	New Orleans, LA	2/05
14th Internat'l. Symposium on Human Identification	Phoenix, AZ	10/03
AAFS 55TH ANNUAL MEETING	Chicago, IL	2/03
Forensic Mitochondrial DNA Analysis: A Community Forum WorkshopRecovery, Examination, and Evidence of Decomposed and Skeletonized Bodies: An Anthropological and Entomological Approach Workshop		
AAFS 54TH Annual Meeting	Atlanta, GA	2/02
Forensic Imaging Techniques	Las Vegas, NV	01/08

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Las Vegas District Court	DNA	2

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
LVMPD	Forensic Scientist II	01/11-Present
DAE Systems	Forensic Scientist III	10/09-01/11
LVMPD	Forensic Scientist II	05/07-10/09
American Registry of Pathology/Armed Forces DNA Identification Laboratory	Forensic Scientist II	08/03-05/07
American Registry of Pathology/Armed Forces DNA Identification Laboratory	Forensic Scientist I	07/01- 08/03

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
None	

PUBLICATIONS / PRESENTATIONS:
Presenter at AAFS 59TH ANNUAL MEETING "Drowned at Sea: Identification of a Sailor From the USS Gherardi Fifty-Two Years Later"
11/07- Grand jury presentation on DNA and DNA processing at the LVMPD Forensic Lab
4/08- Teach DNA and collection techniques to the new LVMPD CSA Academy

OTHER QUALIFICATIONS:
None

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 07/01/10

Name: James Krylo P#: 5945 Classification: Forensic Scientist II

Current Discipline of Assignment: Firearms / Toolmarks

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks	X	Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	X
Latent Prints	X	Crime Scene Investigations	X
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support	

EDUCATION			
Institution	*Dates Attended*	*Major*	Degree Completed
California State University, Long Beach	9/76 - 12/80	Criminalistics	B.S.

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Benelli Shotgun Armorer's Course	Las Vegas, NV	06/10
Association of Firearm & Toolmark Examiners (AFTE) Annual Training	Las Vegas, NV	05/10
Introduction to Cartridge Reloading (AFTE)	Las Vegas, NV	05/10
Scientific Working Group for Firearms/Toolmarks (SWGGUN) Meeting	Baton Rouge, LA	04/10
Shooting, Hunting, Outdoor Trade (SHOT) Show	Las Vegas, NV	01/10
American Society of Crime Laboratory Directors Laboratory Accreditation Board (ASCLDLAB) International Accreditation Preparation Course	Henderson, NV	12/09
Association of Firearm & Tool Mark Examiners (AFTE) Annual Training	Miami, FL	06/09
Silencer Course (AFTE)	Miami, FL	06/09
Innov-X Systems XRF Training	Las Vegas, NV	08/08

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Colt Defense Colt .45 Pistol Armorer's Course	Las Vegas, NV	08/08
AFTE Annual Training Seminar	Honolulu, HI	05/08
Springfield Armory XD Pistol Armorer's Course	Las Vegas, NV	01/08
Scientific Working Group for Firearms/Toolmarks (SWGGUN) Meeting	Atlanta, GA	11/07
Innov-X Systems XRF Training	Las Vegas, NV	08/07
Small Arms Review Convention & Gun Show	Las Vegas, NV	08/07
AFTE Annual Training Seminar	San Francisco, CA	06/07
LVMPD Use of Force Seminar	Las Vegas, NV	05/07
SWGGUN Meeting	Albuquerque, NM	04/07
Long Mountain Outfitters AK 47 Armorer's Course	Henderson, NV	10/06
LVMPD Civilian Use of Force & Firearm Training	Las Vegas, NV	08/06
Smith & Wesson M & P Pistol Armorer's Class (AFTE)	Springfield, MA	06/06
AFTE Annual Training Seminar	Springfield, MA	06/06
SWGGUN Meeting	Las Vegas, NV	4/06
SHOT Show	Las Vegas, NV	2/06
AFTE Annual Training Seminar	Indianapolis, IN	6/05
SWGGUN Meeting	Quantico, VA	3/05
Ammo / Firearm Demonstration, Nellis AFB	Las Vegas, NV	2/05
SHOT Show	Las Vegas, NV	1/05
Winchester Ballistic Workshop	Las Vegas, NV	12/04
Front Sight Firearms Training Institute: Defensive Handgun Course	Pahrump, NV	12/04
Forensic Scene Consultants & Forensic Science Services: Forensic Science Shooting Reconstruction Course	Prescott, AZ	11/04
SWGGUN Meeting	Quantico, VA	9/04
Full Auto Conversion Workshop (AFTE)	Vancouver, Canada	5/04
AFTE Annual Training Seminar	Vancouver, Canada	5/04
SHOT Show	Las Vegas, NV	2/04
SWGGUN Meeting	Quantico, VA	4/03

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
California Association of Criminalists (CAC) / Northwestern Association of Forensic Scientists (NWAFS) Training Seminar - Colt Armorer's Workshop	Reno, NV	4/03
Southwestern Association of Forensic Scientists (SWAFS) Training Seminar	Scottsdale, AZ	11/02
Mossberg Shotgun Field Armorer's Course (AFTE)	San Antonio, TX	5/02
Hi-Point Firearms Armorer's Course (AFTE)	San Antonio, TX	5/02
Ricochet Analysis Workshop (AFTE)	San Antonio, TX	5/02
AFTE Annual Training Seminar	San Antonio, TX	5/02
National Integrated Ballistic Information Network (NIBIN) Training	Largo, FL	3/02
FBI: Techniques in Firearms Identification Course	Quantico, VA	2/02
SHOT Show	Las Vegas, NV	2/02
Southern California Firearms Study Group	San Bernardino, CA	11/01
Digital Imaging Workshop	Las Vegas, NV	10/01
Digital Imaging Workshop	Las Vegas, NV	9/01
AFTE Annual Training Seminar	Newport Beach, CA	7/01
Forensic Identification Training Seminars: Advanced Shooting Incident Reconstruction	Las Vegas, NV	9/00
AFTE Annual Training Seminar	St. Louis, MO	6/00
Forensic Identification Training Seminars: Shooting Incident Reconstruction	Las Vegas, NV	2/00
AFTE Annual Training Seminar	Williamsburg, Va	7/99
National Forensic Science Technology Center: Laboratory Auditing	Las Vegas, NV	6/99
International Association for Identification (IAI) Nevada State Division Training Conference	Las Vegas, NV	4/99
FBI Bullet Trajectory and Shooting Reconstruction School	Los Angeles, CA	10/98
Washington State Criminal Justice Training Center (WSCJTC) & Washington State Law Enforcement Firearms Instructors Association (WSLEFIA)Training Seminar	Seattle, WA	02/98
International Association of Bloodstain Pattern (IABPA) Analysts Training Seminar	Seattle, WA	11/97
FBI: Gunshot Residue School	Marysville, WA	08/97
Forensic Technology "IBIS" Training Course	Tacoma, WA	08/97
Mnemonic Systems Inc. Introduction to "Drugfire" Course	Washington, DC	08/97

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Remington Shotgun/Rifle Armorer's Course	Bellevue, WA	05/97
Oehler Ballistics Workshop	Fredricksberg, TX	04/96
Heckler & Koch MP5/Rifle Armorer's Course	Tacoma, WA	03/96
WSLEFIA Training Seminar	Seattle, WA	12/95
Colt M16 / AR15 Armorer's Course	OR	10/95
Federal Cartridge Co. Law Enforcement Ammunition and Ballistics Seminar	Tacoma, WA	04/95
WSCJTC & WSLEFIA Training Seminar	Seattle, WA	03/95
Range Management Services Inc.: Managing Lead Hazards in Indoor Firing Ranges	Olympia, WA	11/94
WSLEFIA Training Seminar	Seattle, WA	04/49
Ruger Revolver/Pistol/Rifle Armorer's Course	Tacoma, WA	11/93
WSCJTC & WSLEFIA Training Seminar	Seattle, WA	10/93
SigSauer Pistols Armorer's Course (AFTE)	Raleigh, NC	05/93
Ruger Revolver Familiarization Course (AFTE)	Raleigh, NC	05/93
AFTE Annual Training Seminar	Raleigh, NC	05/93
Smith & Wesson Pistol Armorer's Course	Bellevue, WA	04/93
Beretta Pistol Armorer's Course	Tacoma, WA	10/92
Smith & Wesson Revolver Armorer's Course	Galt, CA	06/92
Glock Pistol Armorer's Course	Oregon City, OR	04/92
WSLEFIA Training Seminar	Seattle, WA	02/92
Oregon State Police Advanced Firearms Training	OR	1992
Washoe County Sheriff's Office Advanced Crime Scene Reconstruction	Reno, NV	02/91
IABPA Training Seminar	Reno, NV	11/90
IAI Pacific Northwest Division Training Seminar	Yakima, WA	05/90
Midwestern Association of Forensic Scientists (MWAFS) Blood Spatter Workshop	MN	04/90
IAI Pacific Northwest Division Training Seminar	Spokane, WA	05/89
WSCJTC Homicide Investigation	Seattle, WA	04/89
Kodak/Nikon Law Enforcement Photography	Tacoma, WA	03/89

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
AFTE Annual Training Seminar	Seattle, WA	1988
Washington State Patrol Leaf Marijuana Identification	Shelton, WA	09/87
FBI: Advanced Latent Fingerprint Techniques	Seattle, WA	12/86
Loctite Corp. Cyanoacrylate Fuming for Latent Fingerprint Techniques		06/85
IAI Pacific Northwest Division Training Seminar	Olympia, WA	05/85
FBI: Fingerprint Identification	Seattle, WA	12/84
(AFTE) Annual Training Seminar	San Mateo, CA	1983

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Federal Court: Washington (Tacoma)	Latent Prints	1
Municipal Court: California (Orange County)	Latent Prints	5
Superior Court: California (Orange County)	Latent Prints	2
Superior Court: Washington (King & Pierce Counties)	Latent Prints	11
Federal Court: Nevada (Las Vegas)	Firearms	2
District Court: Nevada (Clark and Nye Counties)	Firearms	115
Coroner's Inquest : Nevada (Clark County)	Firearms	5
Grand Jury: Nevada (Clark County)	Firearms	14
Justice Court: Nevada (Las Vegas, North Las Vegas and Henderson)	Firearms	10
Federal Grand Jury: Washington (King County)	Firearms	1
Superior Court: Washington (Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, King, Kitsap, Klicitat, Lewis, Mason, Pacific, Pierce, San Juan, Skamania, Snohomish, and Thurston Counties	Firearms	110
District Court: Washington (Pacific County)	Firearms	1
Juvenile Court: Washington (Pierce and King Counties)	Firearms	4
Coroner's Inquest: Washington (King County)	Firearms	4
Superior Court: California (Orange County)	Firearms	11
Juvenile Court: California (Orange County)	Firearms	1
Grand Jury: California (Orange County)	Firearms	1

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Military Court: USMC El Toro (CA)	Firearms	1

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist II	1998 - present
Washington State Patrol	Forensic Scientist 3	1991 - 1998
Pierce County Sheriff's Department	Identification Officer	1986 - 1991
Seattle Police Department	Identification Technician	1984 - 1986
Orange County Sheriff's Department	Forensic Specialist	1981 - 1984
Anaheim Police Department	Identification Technician	1981

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
Association of Firearm and Toolmark Examiners (AFTE)	1993 - present
Scientific Working Group for Firearms and Toolmarks (SWGGUN)	2002 - 2008

PUBLICATIONS / PRESENTATIONS:
BRI 12 GA/.500 Sabot Bullet - AFTE Journal - October 1983
Trigger Pull Statistics - AFTE Journal - January 1985
Drop Testing a 45 Auto Colt 1911 - AFTE Journal - Spring 1997
Cartridge Interchangeability in a Norinco Pistol - AFTE Journal - Summer 2000
Slide Failure of a Jennings/Bryco Pistol - AFTE Journal - Spring 2004
Armscor Precision Strike Three Ammunition - AFTE Journal - Summer 2004

OTHER QUALIFICATIONS:
AFTE Certification in Firearm Evidence Examination and Identification – May 2003
AFTE Certification in Toolmark Evidence Examination and Identification – May 2003
AFTE Certification in Gunshot Residue Evidence Examination and Identification – May 2003
AFTE Distinguished Member - June 2006
AFTE President – 2009 to 2010

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
CURRICULUM VITAE

Date: 11/26/13

Name: Anya Lester P#: 13771 Classification: Forensic Scientist II

Current Discipline of Assignment: Firearms and Toolmarks

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Toxicology/Blood Alcohol	
Toolmarks	X	Toxicology/Breath Alcohol	
Trace Evidence		Toxicology/Drugs	
Arson Analysis		Firearms	X
Latent Prints		Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
Oakland Fire Training Institute	2004-2005	Firefighter I and II	Certification, 2005
Henry Ford Community College	1998-2000	Emergency Medical Services - Paramedic	Certification, 2000
Edinboro University	1995-1997	Biology	Graduate courses
Michigan State University	1989-1994	Forensic Science	B.S., 1994

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Toolmark Identification and Comparison Training	Ammendale, MD	07/30 - 08/03/2012
Southern CA Firearms Study Group - BB and Airsoft Training	Los Angeles, CA	12/08/2011
Hi-Point Firearms Armorer's Course	Chicago, IL	06/03/2011
BATFE Machine Gun Conversions/Silencers workshop	Chicago, IL	06/02/2011
AFTE Annual Training Seminar	Chicago, IL	05/29-06/03/2011

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Basic Shooting Reconstruction Course	Las Vegas, NV	01/24/11-01/26/11
ATF Serial Number Restoration Course	Las Vegas, NV	09/27/10-09/29/10
Colt .45/Model "O" and Colt M16/AR-15 Armorer's School	Las Vegas, NV	08/02/10-08/07/10
LAR Manufacturing Factory Tour	West Jordan, UT	07/14/10
North American Arms Factory Tour	Provo, UT	07/13/10
Barnes Bullets Ammunition Factory Tour	Mona, UT	07/13/10
Sig Sauer Classic Pistols Amorer's School	Las Vegas, NV	07/07/10-07/08/10
Sturm Ruger Firearms Factory Tour	Prescott, AZ	06/19/10
Dillon Precision Reloading Factory Tour	Scottsdale, AZ	06/18/10
Schneider Rifle Barrels Factory Tour	Payson, AZ	06/18/10
Benelli M1, M2, M4 Armorer's School	Las Vegas, NV	06/16/10-06/17/10
Beretta 90 Series and Px4 Armorer's School	Las Vegas, NV	06/14/10-06/15/10
AFTE Annual Training Seminar	Henderson, NV	05/02/10-05/07/10
Innov-x XRF Safety and Operator Training	Las Vegas, NV	04/08/10
ATF IBIS Data Acquisition Training	Largo, FL	01/24/10-01/29/10
Glock Armorer's School	Las Vegas, NV	01/20/10

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Clark County District Court	Firearms Identification	3

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist I/II	10/2010 - present
Las Vegas Metropolitan Police Department	Forensic Scientist Trainee	10/2009-10/2010
Las Vegas Metropolitan Police Department	Forensic Laboratory Aide	12/2008-10/2009

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
College of Southern Nevada	American Heart Association Training Center Coordinator	11/2006-12/2008
College of Southern Nevada	Part-Time Instructor Healthcare Continuing Education	11/2006 - present
Oakland Community College	Laboratory Paraprofessional – Forensic Science and EMS Labs	2001-2006
Oakland Community College	Adjunct Faculty – Medical Terminology and EMS	2001-2006

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
Association of Firearm and Toolmark Examiners (AFTE) – Provisional Member	07/2011-present

PUBLICATIONS / PRESENTATIONS:
Poster Presentations, "Evaluation of the Forensics Source Short Length Ballistic Fiber Filled Bullet Catcher," "Remington HD Ultimate Home Defense 12 Gauge Shot Shell Ammunition," "Sub-Caliber Shenanigans," and "Proof of Concept (Preliminary) Results on a Method to Cross Check Chronograph Velocities Using Hi-Speed Video Camera," Association of Firearm and Tool Mark Examiners Annual Training Seminar, May 2010
Accepted Presenter, "How the College of Southern Nevada Met Community Needs Using the American Heart Association Programs for Healthcare Professionals", National Council for Workforce Education Conference, Fall 2007
Advanced Cardiac Life Support Presenter, Symposium on Emergency, Trauma, and Critical Care Medicine, Spring 2007
Presenter Michigan EMS EXPO, "Pediatric IV/IO 'When You're More Scared Than They Are'", "Advanced Airway Seminar", "Advanced Patient Assessment", 2004, 2005, 2006

OTHER QUALIFICATIONS:
HAZMAT Awareness and Operations Certified
Certified Paramedic, Certified Firefighter I and II – State of MI
American Heart Association Instructor Certified – CPR and First Aid
AHA Emergency Cardiac Care Regional Task Force Member, 2006-2012

AHA Training Center Faculty Member, 2006-present

Las Vegas Criminalistics Bureau
Statement of Qualifications

Name: LYNCH, Shandra P# 13206 Date: 04/04/13

CURRENT CLASSIFICATION		
	Classification	*Minimum Qualifications*
	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		
Institution	*Major*	*Degree/Date*
George Washington University	Crime Scene Investigations	Master of Forensic Science/ Jan 2008
University of Tennessee	Biochemistry & Molecular Biology	Bachelor of Science/ May 2006
University of Tennessee	Anthropology	Bachelor of Arts/May 2005
University of Tennessee	Psychology	Bachelor of Arts/Dec 2001

TESTIMONY		
Yes	*No*	
X		District Court, Justice Court, Grand Jury

EMPLOYMENT HISTORY		
Employer	*Title*	*Date*
LVMPD	Senior CSA	06-23-12 to Present
LVMPD	CSA II	03-10-10 to 06-23-12
LVMPD	CSA I	03-10-08 to 03-10-10
US Secret Service/Sparks Personnel Service	Forensic Services Division Contractor	01/07 - 02/08
Naval Criminal Investigative Service	Forensic Consultant Division Intern	08/07 - 12/07
Central Leasing	Sales Associate	11/04 - 07/06

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/24/10

Name: Alice V. Maceo P#: 7828 Classification: Forensic Lab Manager

Current Discipline of Assignment: Management of the Latent Print Detail

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints	X	Crime Scene Investigations	X
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
University of Alaska, Anchorage	1/92 - 8/94	Biology	BS
St. Mary's College of Maryland	9/90 - 12/91	Biology	

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Leadership Development	Las Vegas, NV	1/5 – 1/6/10
Diversity	Las Vegas, NV	12/16/09
ASCLD/LAB-International Preparation Course	Henderson, NV	12/1 – 12/3/09
Leadership Development	Las Vegas, NV	11/17 – 11/18/09
Introduction to Mathematical Statistics	California State University – LB	8/3 - 9/9/09
IAI 94th Educational Conference	Tampa, FL	8/17 – 8/21/09

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Fingerprints and Probability	Nokesville, VA	7/13 - 07/17/09
Introduction to Statistics	UNLV, Las Vegas, NV	6/1 - 7/2/09
HFACS/HFIX Super-user Training	Las Vegas, NV	6/12/09
HFACS/HFIX Two-day Basic Training	Las Vegas, NV	6/10 - 6/11/09
Forensic Science for the 21st Century, ASU	Tempe, AZ	4/3/09 - 4/4/09
IAI 93rd Educational Conference	Louisville, KY	8/18 - 8/22/08
Application of Statistics to Ridgeology And ACE-V Methodology	Las Vegas, NV	03/31 - 04/04/08
Forensic Imaging Techniques	Las Vegas, NV	01/08
The Management Conference	Las Vegas, NV	12/13/07
The Women's Conference	Las Vegas, NV	10/22/07
Interpersonal Communication Skills for Business Professionals	Las Vegas, NV	10/9 - 10/10/07
The Biometric Consortium Conference	Baltimore, MD	9/11 - 9/13/07
Managing Emotions Under Pressure	Las Vegas, NV	9/10/07
IAI 92nd Educational Conference	San Diego, CA	7/23 - 7/27/07
Indiana University Expert Cognitive Psychology Study	Bloomington, Indiana	5/17 - 5/20/07
The Paradigm Shift in Forensic Sciences	Las Vegas, NV	11/9 - 11/10/06
ASCLD Meeting	San Francisco, CA	10/2 - 10/5/06
Management Problems of the Technical Person in a Leadership Role	Las Vegas, NV	9/11/06
Forensic Digital Imaging	Thornton, CO	7/24 - 7/26/06
IAI 91st Educational Conference	Boston, MA	7/3 - 7/7/06
International Symposium on Fingerprints	Interpol Headquarters, Lyon, France	5/17 - 5/18/06
Indiana University Latent Print Research Consulting Meeting	Bloomington, Indiana	5/15 - 5/16/06

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
NIST Latent Testing Workshop	Gaithersburg, MD	4/5 - 4/6/06
Workshop on Ethical and Social Implications of Biometric Identification Technology: Towards and International Approach	European Commission on Science and Society, Brussels, Belgium	12/15 -12/16/05
New England Division IAI Educational Conference	Burlington, VT	11/2/05 - 11/405
ANSI/NIST Fingerprint Standard Update	Gaithersburg, MD	4/26 - 4/28/05
Fingerprint Society Lectures 30th Annual Conference	Brighton, England	3/18 - 3/20/05
Daubert and The Comparative Sciences	Las Vegas, NV	10/29 - 10/30/04
Team Building is for Everyone	Las Vegas, NV	9/28/04
IAI 89th Educational Conference	St. Louis, MO	8/23 - 8/2704
Problem Solving, Independent Decision Making Alt	Las Vegas, NV	8/12/04
Indiana University Expert Cognitive Psychology Study	Bloomington, Indiana	12/15/03
Indiana Division IAI Training Conference	Indianapolis, Indiana	10/21 -10/23/03
IAI 88th Educational Conference	Ottawa, Ontario Canada	7/7 - 7/11/03
Driver's Training	Las Vegas, NV	4/17/03
28th Annual Educational Conference of Fingerprint Society	Oxford, England	3/7 - 3/9/03
FW21 and LEXS Upgrade User Methods and Operations	NEC, Las Vegas, NV	2/5/03
Southern California Association of Fingerprint Officers (SCAFO) Meeting	West Covina, CA	10/11- 10/12/02
IAI 87th Educational Conference	Las Vegas, NV	8/4 - 8/10/02
"The Daubert World: Past, Present, and Future"	Las Vegas, NV	6/21 - 6/23/02
Physical Fracture Match Workshop	Arlington, TX	12/01

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
The Fingerprint Society Centennial Conference on Identification	London, England	6/25 - 6/29/01
Crime Scene Reconstruction	Miami, FL	9/00
IAI 85th Educational Conference	Charleston, WV	7/23 - 7/29/00
Latent Print Searches in AFIS 21	Anchorage, AK	6/21 - 6/22/00
Combined Advanced Ridgeology, Demystifying Palm Prints and Comparison Techniques: Research and Graduate Assistant	Salem, Oregon	10/18 - 10/29/99
IAI 84th Educational Conference	Milwaukee, WI	7/11 - 7/17/99
Investigative Photography - Intermediate Level	Anchorage, AK	4/99
Administrative Advanced Latent Fingerprint School	Quantico, VA	3/8 - 3/26/99
Bloodstain Pattern Analysis	Miami, FL	12/98
Combined Advanced Ridgeology, Demystifying Palm Prints and Comparison Techniques	Meridian, Mississippi	10/26 - 11/6/98
Crime Scene Investigation II	Miami, FL	8/98
Advanced Ridgeology Comparison Techniques	Mesa, AZ	5/4 - 5/8/98
Mastering Expert Testimony	Mesa, AZ	4/27 - 5/1/98
Crime Scene Investigation	Miami, FL	2/98
Methods of Instruction	Anchorage, AK	1/12 - 1/16/98
Photography	Anchorage, AK	11/13/97
Latent Fingerprint Development	Anchorage, AK	6/3 - 6/5/97
Uniform Investigator Training	Anchorage, AK	5/19 - 5/22/97

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
District Court of Clark County	Latent Print Examination	24
Nevada Grand Jury	Latent Print Examination	12
Nevada Justice Court	Latent Print Examination	11
Nevada Federal Court	Latent Print Examination	8
Alaska Superior Court	Latent Print Examination	5
Alaska Grand Jury	Latent Print Examination	2

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
Self-employed	Forensic Instructor	12/06 - present
LVMPD Forensic Laboratory	Forensic Lab Manager	7/06 - present
LVMPD Forensic Laboratory	Latent Print Examiner II	9/02 - 6/06
Henderson Police Department	Crime Scene Analyst II	8/01 - 7/02
Henderson Police Department	Forensic Consultant	5/01 - 8/01
State of Alaska Crime Laboratory	Latent Print Examiner III	4/97 - 4/01

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
Expert Working Group on Human Factors in Latent Print Analysis	2008 - present
Journal of Forensic Identification Editorial Review Board	2007 - present
General Forensics Technology Working Group	2007 - 2009
The Fingerprint Society, Fellow	2002 - 2007
Scientific Working Group on Friction Ridge Analysis, Study and Technology (SWGFAST)	2001 - present
International Association for Identification (IAI), Distinguished Member 2004	1997 - present

PUBLICATIONS / PRESENTATIONS:
Publications:
Maceo, Alice. "Qualitative Assessment of Skin Deformation: A Pilot Study", *Journal of Forensic Identification*, 59(4): 390-440.
Maceo, Alice. "Friction Ridge Skin - Morphogenesis and Overview" *Criminalistics Section of the Wiley Encyclopedia of Forensic Science*, John Wiley & Sons, Ltd. Editors-in-Chief Allan Jamieson and Andre Moenssens; Volume 3:1322-1331.
Maceo, Alice. "Documentation of Friction Ridge Impressions: From the Scene to the Conclusion" Chapter 11 of the Friction Ridge Source Book, *West Virginia University*, In press 2010.
Maceo, Alice. "Anatomy and Physiology of Adult Friction Ridge Skin" Chapter 2 of the Friction Ridge Source Book, *West Virginia University*, In press 2010.
Maceo, Alice. "Scars in Friction Ridge Skin", *Evidence Technology Magazine*, July 2005, p.26-28.
Maceo, Alice. "The Basis for The Uniqueness and Persistence of Scars in the Friction Ridge Skin", *Fingerprint Whorld*, 2005, 31(121):147-161.
Maceo, Alice. "The Biology of Skin", *Journal of Forensic Identification* 2003, 53(5):585-595.
Wertheim, Kasey and Maceo, Alice. "The Critical Stage of Friction Ridge and Pattern Formation", *Journal of Forensic Identification*, 2002, 52(1):23-73.
Maceo, Alice and Wertheim, Kasey. "Use of Ninhydrin in the Recovery of Latent Prints on Adhesive Surfaces Attached to Porous Surfaces", *Journal of Forensic Identification*, 2000, 50(6):581-594.
Presentations and Courses:
5/13 – 5/14/10 "Analysis of Distortion in Latent Prints", Michigan State Police, Detroit, MI
4/15 – 4/16/10 "Analysis of Distortion in Latent Prints", California Criminalistics Institute, Sacramento, CA
3/25/10 "Careers and Internships in Forensic Science" UNLV College of Sciences, Las Vegas, NV
3/23/10 "Admissibility of Latent Print Evidence", UNLV Law School, Las Vegas, NV
3/5 – 3/6/10 "Analysis of Distortion in Latent Prints", Colorado Bureau of Investigation, Denver, CO
12/10 – 12/11/09 "Analysis of Distortion in Latent Prints", Northern Colorado Regional Crime Laboratory, Ft. Collins, CO
10/15 – 10/16/09 "Analysis of Distortion in Latent Prints", Indiana IAI, Greenwood, IN
8/21/09 "Analysis of Distortion in Latent Prints", 94th IAI Educational Conference, Tampa, FL

PUBLICATIONS / PRESENTATIONS:
8/19/09 Panel Discussion: Potential Effects of Bias in Latent Print Examination
8/19/09 "Analysis of Distortion in Latent Prints", 94th IAI Educational Conference, Tampa, FL
8/18/09 "Analysis of Distortion in Latent Prints", 94th IAI Educational Conference, Tampa, FL
4/15 – 4/17/09 "Analysis of Distortion in Latent Prints" Los Angeles County Sheriff's Department, Los Angeles, CA
3/19 - 3/20/09 "Analysis of Distortion in Latent Prints" San Bernardino County Sheriff's Office, San Bernardino, CA
2/19 - 2/20/09 "Analysis of Distortion in Latent Prints" Oregon State Police, Clackamas, OR
2/9 – 2/10/09 "Analysis of Distortion in Latent Prints" LVMPD, Las Vegas, NV
1/22 – 1/23/09 "Analysis of Distortion in Latent Prints" California Criminalistics Institute, Sacramento, CA
8/22/08 "Analysis of Distortion in Latent Prints", 93rd IAI Educational Conference, Louisville, KY
8/21/08 "Analysis of Distortion in Latent Prints", 93rd IAI Educational Conference, Louisville, KY
8/19/08 "Analysis of Distortion in Latent Prints", 93rd IAI Educational Conference, Louisville, KY
6/26 – 6/27/08 "Analysis of Distortion in Latent Prints" Minnesota BCA, St. Paul, MN
6/13/08 "Introduction to Forensic Lab Services" Nevada DPS, Las Vegas, NV
5/29 – 5/30/08 "Analysis of Distortion in Latent Prints" FBI Laboratory, Quantico, VA
2/22/08 "Daubert and Pattern Evidence" - Panel Discussion, American Academy of Forensic Sciences, Washington DC
1/24 - 1/25/08 "Analysis of Distortion in Latent Prints" Ohio Bureau of Criminal Identification, London, OH
1/16/08 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV
11/8/07 "Analysis of Distortion in Latent Prints", NEDIAI, Newport, RI
9/13/07 "Analysis of Distortion in Latent Prints", Maryland State Police, Pikesville, MD
8/9 - 8/10/07 "Analysis of Distortion in Latent Prints", Los Angeles County Sheriff's Department, San Dimas, CA
7/27/07 "Analysis of Distortion in Latent Prints", 92nd IAI Educational Conference, San Diego, CA
7/25/07 "Analysis of Distortion in Latent Prints", 92nd IAI Educational Conference, San Diego, CA
7/24/07 "Analysis of Distortion in Latent Prints", 92nd IAI Educational Conference, San Diego, CA

PUBLICATIONS / PRESENTATIONS:
7/23/07 "Moving Forward with Objectivity" - Panel Discussion, 92nd IAI Educational Conference, San Diego, CA
6/18/07 "Latent Print Evidence", LVMPD CSA Academy, Las Vegas, NV
6/6/07 "Introduction to Forensic Science: Latent Prints", Clark County District Attorney's Office, Las Vegas, NV
5/31 - 6/1/07 "Analysis of Distortion in Latent Prints", Contra Costa County Sheriff's Office, Martinez, CA
5/23/07 "Introduction to Latent Print Collection", LVMPD Laughlin Substation, NV
5/14 - 5/15/07 "Analysis of Distortion in Latent Prints", LVMPD, Las Vegas, NV
5/3 - 5/4/07 "Analysis of Distortion in Latent Prints", New York Department of Criminal Justice, Albany, NY
3/19 - 3/20/07 "Analysis of Distortion in Latent Prints", Arizona Identification Council, Mesa, AZ
12/18 - 12/19/06 "Analysis of Distortion in Latent Prints", Dutch National Police, Zoettermeer, Netherlands
12/15/06 "Forensic Science Series: Latent Prints", Clark County District Attorney's Office, Las Vegas, NV
11/10/06 "Error Rates in Non-Forensic Disciplines", ABFDE Daubert Symposium, Las Vegas, NV
10/9/06 "Error Rates: Method, Theory, and Practice", Indiana IAI Division 13th Annual Educational Conference of Forensic Investigation, Examination and Identification, Indianapolis, IN
10/9/06 "Aging and Wound Healing of the Friction Ridge Skin", Indiana IAI Division 13th Annual Educational Conference of Forensic Investigation, Examination and Identification, Indianapolis, IN
9/29/06 "Persistence of Scars in Friction Skin", SCAFO 15th Annual Forensic Training Seminar, Diamond Bar, CA
9/29/06 "Friction Ridge Skin Distortion", SCAFO 15th Annual Forensic Training Seminar, Diamond Bar, CA
8/24/06 "Biology of Friction Ridge Skin", NSDIAI Tri-State Educational Conference, Las Vegas, NV
7/7/06 "Analysis of Distortion in Latent Prints", IAI 91st Educational Conference, Boston, MA
7/5/06 "Error Rates: Method, Theory, and Practice", IAI 91st Educational Conference, Boston, MA
7/4/06 "Analysis of Distortion in Latent Prints", IAI 91st Educational Conference, Boston, MA
7/4/06 "Aging and Wound Healing in the Friction Ridge Skin", IAI 91st Educational Conference, Boston, MA

PUBLICATIONS / PRESENTATIONS:
7/3/06 "Analysis of Distortion in Latent Prints", IAI 91st Educational Conference, Boston, MA
5/17/06 "Analysis of Distortion in Fingerprints", International Symposium on Fingerprints, Interpol Headquarters, Lyon, France
12/16/05 "Biometrics: Gold Mine or Land Mine For Law Enforcement", Workshop on Ethical and Social Implications of Biometric Identification Technology: Towards an International Approach organized by the European Commission on Science and Society, Brussels, Belgium
10/21/05 "Biological Basis of Uniqueness and Persistence of the Friction Ridge Skin", Arizona Identification Council Conference, Maricopa, Arizona
10/5/05 "Analysis of Distortion in Latent Prints", Midwestern Association of Forensic Scientists, St. Louis, Missouri.
3/31/05 "Biological Basis of the Uniqueness, Persistence and Pattern Formation", Wisconsin IAI Educational Conference, Madison, WI
3/21/05 "Biological Basis of the Uniqueness, Persistence and Pattern Formation", Dutch National Police, Ridgeology Workshop, Zoettermeer, Netherlands
3/20/05 "Aging and Wound Healing of the Friction Ridge Skin", Fingerprint Society Lectures, Brighton, England
2/22/05 "Biological Basis of the Uniqueness, Persistence and Pattern Formation", Toronto Police Identification Conference, Toronto, Canada
1/13/05 "Introduction to Physical Evidence", Nevada Department of Wildlife, Las Vegas, Nevada
12/15/04, "A Friction Ridge Story", Phoenix Police Department, Phoenix, AZ
11/18/04, "The Impact of Check 21 on Latent Print Examinations", International Association of Financial Crimes Investigators, Las Vegas, NV
10/30/04, "A Friction Ridge Story", Daubert and the Comparative Sciences, Las Vegas, NV
9/21/04, "Crime Scene Chemicals", American Bio-Recovery Association, Las Vegas, NV
8/25/04, "A Friction Ridge Story", IAI 89th Educational Conference, St. Louis, Missouri
5/12/04, "A Friction Ridge Story", California State Division IAI Conference, Sacramento, California
4/8/04, "A Friction Ridge Story", Nevada State Division IAI Conference, Las Vegas, Nevada
3/9/04, "CSI: The 9 Part Series - Session 3: Latent Print Examinations", Clark County Bar Association, Las Vegas, Nevada
10/23/03, "Scientific Working Groups Update", Indiana Division IAI Training Conference

PUBLICATIONS / PRESENTATIONS:
10/21/03, "Pattern Formations in Nature and Fetal Ridge Formation", Indiana Division IAI Training Conference
7/8/03, "Patterns in Nature: Natural Selection vs. Physics", IAI 88th Educational Conference, Ottawa, Canada
3/9/03 "Biology of Friction Ridge Skin", 28th Annual Educational Conference of Fingerprint Society, Oxford, England
10/11/02 "Biology of Friction Ridge Skin", Southern California Association of Fingerprint Officers (SCAFO) Meeting, West Covina, CA
6/29/01 "Friction Ridge Skin and Pattern Formation During the Critical Stage: Fact and Theory", Centennial Conference on Identification - London, England
7/25/00 "Friction Ridge Skin and Pattern Formation During the Critical Stage: Fact and Theory", IAI 85th Educational Conference - Charleston, West Virginia
7/14/99 "Use of Ninhydrin in the Recovery of Latent Prints on Adhesive Surfaces Attached to Porous Surfaces", IAI 84th Educational Conference, Milwaukee, Wisconsin
OTHER QUALIFICATIONS:
Certified Latent Print Examiner by the International Association for Identification (IAI) 2001 to present
Certified Crime Scene Analyst by the International Association for Identification (IAI) 2000 - 2003

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 01/15/08

Name: Julie Marschner P#: 8806 Classification: Forensic Scientist II

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology	X	Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Quality Assurance		Technical Support /	

EDUCATION

Institution	Dates Attended	Major	Degree Completed
Virginia Commonwealth University	08/2003 - 12/2004	Forensic Science	M.S.
CA Polytechnic State University, San Luis Obispo	06/1997 - 06/2001	Biological Sciences	B.S.

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	Location	Dates
Internship: Virginia Department of Forensic Science - Forensic Biology and DNA Section	Richmond, VA	6/04 to 08/04
Orientation for Civilian Employees	Las Vegas, NV	10/05
Drivers Training II	Las Vegas, NV	10/05
11 th National CODIS Conference	Arlington, VA	11/05
National Institute of Justice Expert Systems Testbed Project	Huntington, WV	2/06
American Academy of Forensic Sciences 58th Annual Meeting	Seattle, WA	2/06
Serological Techniques and DNA Screening - Colleen Proffitt, MFS	Las Vegas, NV	5/06
Bode Advanced DNA Technical Workshop	Captiva Island, FL	06/06

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	**Location**	**Dates**
Bode Workshop - "Presenting Statistics in the Courtroom"	Captiva Island, FL	06/06
Differential Extraction	Las Vegas, NV	06/06
Complex Mixture Interpretation	Lakewood, CO	08/06
17th International Symposium on Human Identification	Nashville, TN	10/06
Advanced Topics in Statistics	Nashville, TN	10/06
CODIS 5.7.3 Software Training	McLean, VA	11/06
Forensic Population Genetics and Statistics	Las Vegas, NV	11/27/06
13th National CODIS Conference	Burlingame, CA	10/07
FBI DNA Auditor Training	Burlingame, CA	10/07

COURTROOM EXPERIENCE		
Court	**Discipline**	**Number of Times**
Clark County District Court	Biology/DNA	4

EMPLOYMENT HISTORY		
Employer	**Job Title**	**Date**
Las Vegas Metropolitan Police Department Forensic Lab	Forensic Scientist	07/2005 - Present
Perlegen Sciences, Mountain View, CA	Research Assistant II	07/2001 - 08/2003

PROFESSIONAL AFFILIATIONS	
Organization	**Date(s)**
American Academy of Forensic Sciences - Trainee Affiliate in Criminalistics	02/07 - Present

PROFESSIONAL AFFILIATIONS	
Organization	**Date(s)**

PUBLICATIONS / PRESENTATIONS:
None

OTHER QUALIFICATIONS:
None

[FL 11/00]

Las Vegas Criminalistics Bureau
Statement of Qualifications

Name: Terry Martin P# 5946 Date: 10-1-03

CURRENT CLASSIFICATION

	Classification	*Minimum Qualifications*
	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

Institution	*Major*	*Degree/Date*
U of Texas-San Antonio	Criminal Justice	Bachelors Degree-1996

TESTIMONY

Yes	*No*	

EMPLOYMENT HISTORY

Employer	*Title*	*Date*
LVMPD	Sr. Crime Scene Analyst	7-13-98

H:\FRONTOFF\SHIRLEY\WORKAREA\EDUCATION\MARTIN_EDUCAT.WPD

MARTIN, TERRY P# 5946 CRIMINALISTICS BUREAU - FIELD

SENIOR CSA SS#: 218-90-1956 DOH: 07-13-98

DATE	CLASS TITLE	AGENCY	CREDIT HOURS
8-96	Criminal Justice	U of Texas- San Antonio	Degree
07-28-98	New Civilian Employee Orientation	LVMPD	14
08-10-98	CAPSTUN for Civilians	LVMPD	1.5
08-10-98	Stress Management	LVMPD	4
08-12-98	Civilian Use of Force & Firearms Training	LVMPD	21
08-12-98	Optional Weapon	LVMPD	
08-13-98	Combat Shooting Simulator - FATS	LVMPD	1
07-13 to 08-14-98	Crime Scene Analyst Academy - Criminalistics Bureau	LVMPD	175
08-10-98	Stress Management	LVMPD	4
10-20-98	Criminalistics Bureau - Field Training	LVMPD	400
12-04-98	Duty Weapon Qualification	LVMPD	2
12-07-98	Training - Motor Home Driving	LVMPD	4
12-23-98	Class II - Driver Training	LVMPD	8
03-30-99	Duty Weapon Qualification/Off-Duty Weapon Qualification	LVMPD	2
04-16-99	Duty Weapon Qualification/Off-Duty Weapon Qualification	LVMPD	2
04-21-99	Critical Procedures Test	LVMPD	2
05-17-99	Forensic Science Certificate	American Institute of Applied Science (AIAS)	260
06-03-00	Optional Weapon	LVMPD	15
08-30 to 09-01-99	Clandestine Laboratory Safety Certification Course, Occasional Site Worker	LVMPD	24
09-08-99	Combat Shooting Simulator/FATS	LVMPD	1
09-13 to 09-17-99	Crime Scene Technology 2	Northwestern University, Traffic Institute	40
09-21-99	Duty Weapon Qualification	LVMPD	2

H:\FRONTOFF\SHIRLEY\WORKAREA\EDUCATION\MARTIN_EDUCAT.WPD

01-20-00	Latent Fingerprint Development Workshop	U.S. Secret Service	8
12-23-00	Crime Scene Analyst Certification Certificate	IAI	
09-20-01	LVMPD Defensive Driving Course	LVMPD	8
12-03 to 12-07-01	Advanced Practical Homicide Investigation	P.H.I. Investigative Consultants, Inc.	40
2-6-02	Crime Scene Analyst (Level 2)	IAI	
03-30-02	Documentation of Footwear & Tire Impressions	LVMPD	1
03-30-02	Forensic Anthropology	LVMPD	1.5
04-01-02	Clandestine Laboratory Safety - Fingerprint Processing	LVMPD	1
04-01-02	Chemical Enhancements of Bloodstains, Preliminary Steps	LVMPD - Criminalistics Bureau	1
04-01-02	Major Case Prints	LVMPD	3
02-03 to 02-05-03	Shooting Incident Reconstruction - Forensic Identification Training Seminars	LVMPD	24
02-06 to 02-08-03	Advanced Shooting Incident Reconstruction - Forensic Identification Training Seminars	LVMPD	24

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 02/23/11

Name: Crystal May P#: 9288 Classification: Forensic Lab Technologist

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support / DNA	X

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
University of New Haven	8/03-12/04	Forensic Science-Criminalistics	M.S.
Saint-Mary-of-the-Woods College	8/99-6/03	Biology	B.S.

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Forensic Biology Screening	Las Vegas, NV	09/29/10
Terminal Operator Certification	Las Vegas, NV	09/24/10
Plexor HY and Identifiler Plus	Las Vegas, NV	09/09/10
DNA Mixture and Interpretation & Statistics	Las Vegas, NV	07/15/10
Promega Plexor HY Overview	Las Vegas, NV	07/13/10
Evidence Evaluation and Collection for the Presence of DNA	Las Vegas, NV	03/10/10

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
AB HID University RT-PCR	Las Vegas, NV	02/03/10
AB HID University 240, Basic GMIDX	Las Vegas, NV	07/28/10
Urine Drug Screen Training Completion	Las Vegas, NV	06/18/09
Siemens Syva VIVA-E Analyzer	Las Vegas, NV	06/16/09
Blood Drug Screen Training Completion	Las Vegas, NV	03/02/09
Hair Evaluation for DNA Analysis	Las Vegas, NV (WVU online)	02/09/09
Orasure Forensic Toxicology Training 101	Las Vegas, NV	01/27/09
Biological Fluid Identification	Sacramento, CA	07/15/08-07/18/08
AB CE Troubleshooting and GMID-X	Las Vegas, NV	06/04/08
AB7500 RT-PCR/Quant & Quant Duo Kit	Las Vegas, NV	06/24/08
Forensic Photography	Las Vegas, NV	02/14/08
Forensic Imaging Techniques	Las Vegas, NV	01/08
Applied Biosystems Training on 3130xl Genetic Analyzer	Las Vegas, NV	11/01/07
Introduction to Firearm Safety	Las Vegas, NV	10/24/07
Biological Terrorism	Las Vegas, NV (online)	12/27/06
National Incident Management System	Las Vegas, NV (online)	12/27/06
ABFDE Daubert Symposium 2006	Las Vegas, NV	11/06
Heartsaver First Aid (American Heart Association)	Las Vegas, NV	10/20/06
Drivers Training II	Las Vegas, NV	9/21/06

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
None		

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
LVMPD Forensic Laboratory	Forensic Laboratory Technologist	6/07-present
LVMPD Forensic Laboratory	Forensic Laboratory Technician	7/06-6/07
Denny's Pharmacy	Pharmacy Tech	8/05-6/06
Lucas County Coroner's Office	Toxicology Intern	05/05-08/05
University of New Haven	Chemistry Teaching Asst	9/03-12/04
Saint-Mary-of-the-Woods College	Chemistry Lab Asst	10/99-6/03
Argonne National Laboratory	Electrochemical Intern	05/02-08/02

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
None	

PUBLICATIONS / PRESENTATIONS:

Electrochemistry Communications, "New Cathode Materials for Silver-based Primary Batteries: $AgCuO_2$ and $AG_2Cu_2O_3$" C.D. May, T.T. Vaughey 6 (2004) 1075-1079.

OTHER QUALIFICATIONS:

None

Curriculum Vitae

Las Vegas Criminalistics Bureau

Statement of Qualifications

Name: Ebony McGhee P# 5158 Date: 10-1-03

CURRENT CLASSIFICATION

	Classification	*Minimum Qualifications*
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

Institution	*Major*	*Degree/Date*
CCSN	Criminal Justice	Associates Degree-1998

TESTIMONY

Yes	*No*	

EMPLOYMENT HISTORY

Employer	*Title*	*Date*
LVMPD	Crime Scene Analyst I	5-29-96

McGHEE, EBONY P# 5158 CRIMINALISTICS BUREAU - FIELD
CSA I SS#: 306-86-7688 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	Ecstacy & 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

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: Moretta McIntyre P# 13207 Date: 03-25-08

CURRENT CLASSIFICATION

	Classification	*Minimum Qualifications*
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
	Crime Scene Analyst II	18 months - two (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

Institution	*Major*	*Degree/Date*
Grossmont College	Forensic Technology	Associate/May 2007

TESTIMONY

Yes	*No*	

EMPLOYMENT HISTORY

Employer	*Title*	*Date*
LVMPD	Crime Scene Analyst I	03-10-08 to Present
Seirus Innovations	Accounting Clerk	01/02 - 08/07
Agri-Beef Company	Accounting Assistant	10/99 - 12/01
Kitsap P.U.D.	Accounting Intern	12/98 - 07/99
Todd McLean	Nanny	06/96 - 12/98

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date:	06/24/10

Name:	D. Angel Moses	P#:	8002	Classification:	Forensic Scientist II

Current Discipline of Assignment:	Firearms/Toolmarks

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks	X	Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	X
Latent Prints		Crime Scene Investigations	X
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
University of Illinois	8/90 – 5/95	Biophysics	B.S.

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Association of Firearm & Tool Mark Examiners (AFTE) – Annual Training Seminar	Las Vegas, NV	05/10
Shooting, Hunting, Outdoor, Trade Show (SHOT Show)	Las Vegas, NV	01/10
Association of Firearm & Tool Mark Examiners (AFTE) – Annual Training Seminar	Miami, FL	05/09
AFTE-FBI Gun Shot Residue Pattern Analysis Workshop	Miami, FL	05/09
AFTE-ATF Silencer Workshop	Miami, FL	05/09
AFTE-Taurus Factory Tour	Miami, FL	05/09
Consecutively Rifled Glock Miami Barrel Study (EBIS)	Las Vegas, NV	04/09

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
AHA – CPR/AED	Las Vegas, NV	11/08
Innov-X (EDX) Training	Las Vegas, NV	08/08
Sig Sauer Armorer Course	Las Vegas, NV	07/08
Small Arms Review Workshops	Las Vegas, NV	08/07
Innov-X (EDX) training	Las Vegas, NV	08/07
AFTE - Annual Training Seminar	San Francisco, CA	05/07
AFTE-Wound Ballistics Workshop	San Francisco, CA	05/07
Bunter mark validation study (T. Johnson)	Las Vegas, NV	05/07
Breechface & Firing Pin aperture validation study (KBI)	Las Vegas, NW	05/07
FBI Audit - NCIC Training Video	Las Vegas, NV	01/07
American Board of Forensic Document Examiners (ABFDE) - Daubert Symposium	Las Vegas, NV	11/06
ATF-Security Awareness Online Training	Las Vegas, NV	11/06
High Speed Video Training	Las Vegas, NV	10/06
Long Mountain Outfitters LLC-A K 47 Factory Certified	Henderson, NV	10/06
AFTE Annual Training Seminar	Springfield, MA	06/06
AFTE-Digital Imaging / Photomicrography Workshop	Springfield, MA	06/06
AFTE-Ruger GP100 Revolver Repair Course / Armory Workshop	Springfield, MA	06/06
AFTE-Analysis & Reconstruction of Long Range Shootings	Springfield, MA	06/06
Officer Involved Shootings, What to Expect	Las Vegas, NV	04/06
Colt Rifle Armorer Class	Las Vegas, NV	08/05
AFTE Annual Training Seminar	Indianapolis, IN	06/05
AFTE-Gradient Lens Workshop	Indianapolis, IN	06/05
Digital Imaging Class with David Witske, Foray Technologies	Las Vegas, NV	02/05
Shot Show	Las Vegas, NV	01/05
Forensic Shooting Scene Reconstruction Course	Paulden, AZ	11/04

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
AHA - CPR / FA	Las Vegas, NV	10/04
AFTE Annual Training Seminar	Vancouver, Canada	05/04
AFTE- Hi-Point Armorer Workshop	Vancouver, Canada	05/04
AFTE-1911 Armorer Workshop	Vancouver, Canada	05/04
NIBIN Users Group Meeting - ATF	Dublin, CA	04/04
PMC Factory Tour	Boulder City, NV	03/04
Bush Master Factory Tour	Lake Havasu City, AZ	03/04
Ruger Factory Tour	Prescott, AZ	03/04
Heckler & Koch, Inc. Armorer Class	Las Vegas, NV	02/04
Smith & Wesson Academy	Las Vegas, NV	01/04
Forensic Ballistics Workshop	Yuma, AZ	12/03
Drivers Training	Las Vegas, NV	10/03
LVMPD Civilian Orientation (Communication Skills)	Las Vegas, NV	07/03
LVMPD Civilian Orientation	Las Vegas, NV	06/03
CPR / AED	Nashville, TN	09/02
National Integrated Ballistic Information Network (NIBIN) training	Largo, FL	09/02
Serial Number Restoration (ATF)	Nashville, TN	03/02
Blood Spatter / Crime Scene	Nashville, TN	11/00
Association of Firearm & Toolmark Examiners / Annual Training Seminar	St. Louis, MO	06/00
Bunter Toolmark Manufacturing Tour	Greenbrier, TN	04/00
TN International Association for Investigation (TNIAI)-Gang Awareness	Nashville, TN	11/99
TNIAI-Saw Marks on Bones	Nashville, TN	11/99
Savage Arms, Inc. / Basic Armorer Course	Westfield, MA	10/99
New England Firearms Manufacturing Tour	Massachusetts, Connecticut, New Hampshire, New York	10/99

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Clark County District Court	Firearms & Toolmark	53
Nye County District Court	Firearms & Toolmark	1
U. S. Federal Court Las Vegas, NV	Firearms & Toolmark	2
Tennessee Circuit Courts Rutherford, Madison, Haywood County	Firearms & Toolmark	3
Tennessee Criminal Courts Scott, Bledsoe, Shelby County	Firearms & Toolmark	7
U.S. Federal Court/Memphis, TN	Firearms & Toolmark	3

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
LVMPD – Forensic Laboratory	Forensic Scientist II/Firearms Examiner	05/03-Present
TN Bureau of Investigation	Forensic Scientist II	08/00 – 03/03
TN Bureau of Investigation	Forensic Scientist I	08/98 – 08/00

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
TN Division of International Association for Identification (TNIAI)	11/98–12/02
Association of Firearms & Toolmark Examiners (AFTE)	01/00-Present

PUBLICATIONS / PRESENTATIONS:
University of Nevada, Las Vegas (UNLV) – Law Class (04/10)
UNLV – Forensic Class (03/10)
CSA Academy-Firearms Training (03/09)
UNLV-Forensic Class (02/09)
CSA Academy-Firearms Training (10/08)
Shadow Ridge High School-Forensic Class (05/08)
CSA Academy-Firearms Training (04/08)
UNLV-Forensic Class (10/07)
NIBIN Presentation to NLVPD (05/07)

PUBLICATIONS / PRESENTATIONS:
Western High School Forensic Presentation (03/07)
UNLV – Forensic Class (03/07)
Garnarelli Junior High Forensic Presentation (02/07)
CSA Academy-Firearms Training (12/06)
UNLV-Forensic Class (10/06)
OTHER QUALIFICATIONS:
None

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/25/10

Name: Kimberly B. Murga P#: 10140 Classification: Forensic Laboratory Manager

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Quality Assurance (DNA Technical Leader)	X	Technical Support	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
George Washington University	1995-1997	Forensic Science	MFS
Chaminade University of Honolulu	1990-1995	Criminal Justice	BS
Chaminade University of Honolulu	1990-1995	Biology	BA

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
The NIJ Conference	Arlington, VA	June 14-16, 2010
Applied Biosystems Real Time PCR, Theory, Quantification, Data Analysis and Troubleshooting Training (4 Hours)	Las Vegas, NV	February 3, 2010
Northeast Regional Forensic Institute Leadership Assessment: Developing the Next Generation of Leaders	Albany, NY	January 14-15, 2010
ASCLD/LAB International Preparation Course	Henderson, NV	December 1-3, 2009

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Promega Technical Leaders Workshop	Las Vegas, NV	October 15, 2009
Promega 20th International Symposium on Human Identification	Las Vegas, NV	October 12-15, 2009
QAS DNA Auditor Refresher Training	Las Vegas, NV	October 11-12, 2009
Police Executive Research Forum Workshop: "DNA: Challenges and Opportunities"	Washington DC	September 23, 2009
Nevada Statewide Mass Fatality Workshop	Las Vegas, NV	July 27-28, 2009
Nevada Statewide Mass Fatality Conference	Las Vegas, NV	May 12, 2009
Civilian Supervisory Development Program, Track II	Las Vegas, NV	September 22-26, 2008
Leadership Skills For Challenging Times	Las Vegas, NV	August 11-14, 2008
LVMPD Driver's Training Certification	Las Vegas, NV	July 15, 2008
Domestic Violence and Sexual Assault Investigations	Reno, NV	May 15, 2008
California Association of Criminalists 8-Hour DNA Workshop	San Diego, CA	May 6, 2008
Applied Biosystems 3130XL Genetic Analyzer Training (6 hours)	Las Vegas, NV	November 2, 2007
LVMPD Introduction to Firearm Safety	Las Vegas, NV	October 24, 2007
National Forensic Science Technology Center Forensic Biology Screening Workshop	Las Vegas, NV	October 15-19, 2007
Mid-Atlantic Association of Forensic Scientists	Washington DC	May, 2007
Applied Biosystems 2-Day Workshop	Washington DC	May, 2006
National Seminars Group, "The Creativity Day Camp for Managers, Supervisors and Team Leaders"	Rockville, MD	November 2005
The National Association of Medical Examiners Meeting	Los Angeles, CA	October 2005

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
FBI DNA Auditor Training Program	Quantico, VA	September 2005
The International Society for Optical Engineering, Defense and Security 2005: Homeland Security, Law Enforcement, and Battleship Technologies	Orlando, FL	March 2005
Applied Biosystems Future Trends in Forensic DNA Technology	Bethesda, MD	September 2004
Promega Annual Meeting	Phoenix, AZ	September 2003
Promega Annual Meeting, "Basic Principles in Statistics"	Phoenix, AZ	September 2003
American Academy of Forensic Sciences Annual Meeting	Chicago, IL	February 2003
SkillPath Seminars, "The Essentials of Communicating with Diplomacy and Professionalism"	Silver Spring, MD	October 2002
Midwestern Association of Forensic Scientists Annual Meeting	Milwaukee, WI	September 2002
Midwestern Association of Forensic Scientists Annual Meeting, "Court Room Testimony" Workshop	Milwaukee, WI	September 2002
George Carmody Statistics Course "Population Statistics and Forensic DNA Analysis"	Rockville, MD	July 2001
American Academy of Forensic Sciences Annual Meeting	Seattle, WA	February 2001
American Academy of Forensic Sciences Meeting, "The Testifying Expert" Workshop	Seattle, WA	February 2001
Joint Task Force Full Accounting Meeting	Honolulu, HI	January 2000
International Association of Forensic Scientists Meeting	Los Angeles, CA	August 1999
International Association of Forensic Scientists Meeting, "Bombing Crime Scene and Evidence" Workshop	Los Angeles, CA	August 1999
International Association of Forensic Scientists Meeting, "Human Bite Mark Investigation" Workshop	Los Angeles, CA	August 1999

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
American Academy of Forensic Sciences Annual Meeting	Orlando, FL	February 1999
American Academy of Forensic Sciences Annual Meeting, "DNA Proficiency Testing" Workshop	Orlando, FL	February 1999
Fred Pryor Systems, "How to Supervise People"	Bethesda, MD	May 1998
Mid-Atlantic Association of Forensic Scientists Annual Meeting	Rockville, MD	May 1998
American Academy of Forensic Sciences Annual Meeting	San Francisco, CA	February 1998
American Academy of Forensic Sciences Annual Meeting, "Forensic Expert Witness Court Testimony"	San Francisco, CA	February 1998
American Academy of Forensic Sciences Annual Meeting, "Recovery, Examination and Analysis of Decomposed and Skeletonized Remains" Workshop	San Francisco, CA	February 1998
Armed Forces Institute of Pathology, "DNA Databanks and Repositories"	Chicago, IL	November 1997
Armed Forces Institute of Pathology, "Basic Forensic Pathology"	Rockville, MD	October 1997
American Academy of Forensic Sciences Annual Meeting	New York, NY	February 1997
American Academy of Forensic Sciences Annual Meeting, "Deadly Paraphilias" Workshop	New York, NY	February 1997
American Academy of Forensic Sciences Annual Meeting, "Multi disciplinary Symposium on the Use of Forensic Science" Workshop	New York, NY	February 1997
Mid-Atlantic Association of Forensic Scientists, "Introduction to Criminalistics"	Gaithersburg, MD	October 1996
Mid-Pacific Association of Forensic Scientists, "Forensics on the Cutting Edge 1995"	Honolulu, HI	March 1995

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*

COURTROOM EXPERIENCE

Court	*Discipline*	*Number of Times*
United States Military Court System	DNA: Autosomal STRs	2
United States Military Court System	DNA: Y-STRs	1
4th Judicial District Court, Rusk County, Texas	DNA: Autosomal STRs	2
District Court, Nevada (VII District)	DNA: Autosomal STRs	6

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Laboratory Manager	2/08 - present
Las Vegas Metropolitan Police Department	Technical Leader, DNA	7/07- 2/08
Armed Forces DNA Identification Laboratory	Assistant Technical Leader, DNA	9/05-7/07
Armed Forces DNA Identification Laboratory	Supervisory DNA Analyst	2/01-9/05
Armed Forces DNA Identification Laboratory	DNA Analyst	4/99-2/01
Armed Forces DNA Identification Laboratory	Branch Chief, Proficiency Test Operations	1/00-12/01
Armed Forces DNA Identification Laboratory	Mitochondrial DNA Technician/Technologist	11/97-4/99
Armed Forces DNA Identification Laboratory	Quality Assurance Officer, Proficiency Test Operations Branch	5/96-11/97

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
American Academy of Forensic Sciences, Member, Criminalistics Section	2003-Present
American Academy of Forensic Sciences, Student, Trainee, and Associate Member, Criminalistics Section	1996-2003
Mid-Atlantic Association of Forensic Scientists	1999-2008

PUBLICATIONS / PRESENTATIONS:
The International Society for Optical Engineering, Defense and Security Symposium 2007: "Caught in the Iraqi War: How DNA was used to Confirm the Genetic Link between an Injured Four-Year Old Girl and her Family", Orlando, FL, April 2007
The International Society for Optical Engineering, Defense and Security Symposium 2007: "An Overview of the Armed Forces Medical Examiner System and its Use of Cutting Edge Technologies to Deal the with Global War on Terrorism", Orlando, FL, April 2007
Sexual Assault Response Team Training Program, "DNA and Its Application to Forensic Science", Rockville, MD, April 2006
The International Society for Optical Engineering, Defense and Security Symposium 2005: "The CSI Effect on Science: The Real Issues Regarding Human Identification and Forensic Science", Orlando, FL, April 2005
Sexual Assault Response Team Training Program, "DNA and Its Application to Forensic Science", Bethesda, MD, April 2005
C Torwalt, **K Murga**, J Epp, AT Balancharna, Y Daoudi, DA Lee, BC Smith. Cervical Smears as an Alternative Source of DNA in the Identification of Human Skeletal Remains. Canadian Society of Forensic Science 2005; 38 (3): 165-169
XXXV International Congress on Military Medicine: "Terror in the Skies After the World Trade Towers: The Identification and Reassociation of Remains from the Pentagon and Somerset Plane Crashes", Washington DC, September 2004
American Academy of Forensic Sciences: "A DNA Paternity Case Involving a Two-Week Old Fetus", Chicago, IL, February 2003.
American Academy of Forensic Sciences, "The Bombing of the USS Cole: The Role of DNA in Sending Seventeen Heroes Home", Chicago, IL, February 2003
American Academy of Forensic Sciences, "Terror in the Skies After the World Trade Towers: The Identification and Reassociation of Remains from the Pentagon and Somerset Plane Crashes", Chicago, IL, February 2003
The 8th National CODIS User's Conference, "Pentagon and Pennsylvania", Arlington, VA, November 2002
Midwestern Association of Forensic Scientists, "Terror in the Skies After the World Trade Towers: The Identification and Reassociation of Remains from the Pentagon and Somerset Plane Crashes", Milwaukee, WI, September 2002
Midwestern Association of Forensic Scientists, "Laboratory Information Systems Applications for Analysis of DNA Typing in the Workplace: New and Improved Methods for Enhancing Efficiency of Case Working Units", Milwaukee, WI, September 2002

PUBLICATIONS / PRESENTATIONS:
Chaminade University of Honolulu, "DNA Forensic Techniques and Case Studies", Honolulu, HI, November 2001
Sonoma State University, "When Bad Things Happen to Good People: The Use of DNA to Identify Remains", Sonoma, CA, February 2001
American Academy of Forensic Sciences Annual Meeting: "The Role of DNA Analysis in Mass Disasters", Seattle, WA, February 2001
Chaminade University of Honolulu, "Forensics and DNA", Honolulu, HI, January 2000
International Association of Forensic Sciences Meeting, "The Mount Baker Crash: Six World War II Soldiers Recovered and Identified After 52 Years Using mtDNA and Anthropological Methods", Los Angeles, CA, August 1999
Chaminade University of Honolulu, "Forensics and DNA", Honolulu, HI, March 1998

OTHER QUALIFICATIONS:
Commendable Action Certificate, Las Vegas Metropolitan Police Department, January 2008
Dedication to the Mission Award, Armed Forces DNA Identification Laboratory, September 2003
American Academy of Forensic Sciences Regional Award on behalf of the Midwestern Association of Forensic Scientists, February 2003
Outstanding Achievement Award, Armed Forces DNA Identification Laboratory, Armed Forces Institute of Pathology, 1999

Curriculum Vitae

AMY NEMCIK

CSA I, Criminalistics Bureau-Field P# 8504
SS #272-72-0987
DOH 10-18-04
DOB 12-31-75

EMPLOYMENT HISTORY

2004 – Present **LVMPD**
CSA I

CURRENT CLASSIFICATION

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 promotion 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

1998 **University of Utah**
BS – Anthropology

TESTIMONY District Court, Justice Court, Grand Jury

CLASSROOM TRAINING

1998 Anthropology - Business Degree, University of Utah

10/19/2004 GroupWise 6.0 Calendar Functions, LVMPD. 7 credit hours

10/20/2004 NCIC – Phase II, LVMPD, 8 credit hours

12/08/2004	Child Abuse and Neglect, LVMPD, 2 credit hours
12/16/2004	Drivers Training, LVMPD, 8 credit hours
11/1 to 11/30/2004	Crime Scene analyst Academy, LVMPD, 160 credit hours
12/06/2004	Testifying in Court, LVMPD, 7 credit hours
12/08/2004	Child Abuse and Neglect, LVMPD, 2 credit hours
12/07/2004	WordPerfect 8 Basic, LVMPD, 7 credit hours
12/29/2004	CSA OC Spray/Defensive Tactics, LVMPD, 7 credit hours
2/02 to 2/09/2005	Orientation for Civilian Employees, LVMPD, 35 credit hours
2/23 to 2/25/2005	Clandestine Laboratory Safety Certification, LVMPD, 24 credit hours
3/14 to 3/18/2005	Crime Scene Technology 2: A Crime Scene Practicum Institute of Applied Forensic Technology, 40 credit hours
3/22 to 3/24/2005	Organized and Ritual Violence (Part 1), NSDIAI, 3 credit hours (3/22/2005)
3/22 to 3/24/2005	Nighttime Photographic Techniques, NSDIAI, 3 credit hours (3/23/2005)
3/22 to 3/24/2005	Homicide Issues: A Prosecutor's Perspective on Presenting Cases to a Jury, NSDIAI, 3 credit hours (3/23/2005)
6/10/2005	Firearms Qualification (For April, May, and June), LVMPD
7/2005	Digital Workstation Training (Sheree Norman, CSI Training Coordinator Assistant), LVMPD, 4 credit hours
8/29/2005	Forensic Science 101, American Institute of Applied Science, 230 credit hours
8/30/2005	Firearms Qualification (Quarterly), LVMPD, 2 credit hours
10/26/2005	FATS (Firearms Training Simulator), LVMPD, 1 credit hour

11/11/2005	Completion of Proficiency Exercise – "Recording Major Case Prints", LVMPD, 2 credit hours
2005	Oct-Nov-Dec-Firearms Qualification, LVMPD, 1 credit hour
12/7/2005	Merging Digital Photography/Crime Scene Investigations, (Instructor: Mike Perkins), LVMPD, 4 credit hours
2/1/2006	Firearms Qualifications – 1st Quarter, LVMPD, 1 credit hour
1/16 to 1/20/2006	Bloodstain Pattern Recognition – Instructor: Craig C. Moore, Niagara Regional Police Service (Canada), LVMPD, 40 credit hours
3/13/ to 3/15/2006	Practical Homicide Investigation, P.H.I. Investigative Consultants Inc., 24 credit hours
3/16 to 3/17/2006	Officer Involved Shootings & In-custody Deaths, LVMPD, 14 credit hours
5/11/2006	Bloodstain Pattern Recognition and Examination of Bloodstained Clothing Workshop, LVMPD, 8 credit hours
6/20/2006	Firearms Qualification – 2nd Quarter, LVMPD, 1 credit hour

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/25/10

Name: Carol J. Retamozo P#: 14280 Classification: Forensic Scientist I

Current Discipline of Assignment: Biology/DNA

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology	X	Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	X
Footwear Impressions		Technical Support /	
Quality Assurance			

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
University of Central Florida	01/08 – 08/08	Forensic Science *Minor: Chemistry*	BS
University of Central Florida	05/01 – 12/03	Molecular Biology and Microbiology	BS

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
FDLE Crime Laboratory Analyst Training Program	Orlando, FL	Dec. 2008 to Feb. 2010
Applied Biosystems HID University *Future Trends in Forensic DNA Technology Seminar Series*	Orlando, FL	Oct. 2009
Advanced DNA Training	Huntington, WV	Dec. 2009

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
FDLE Biology/DNA Section Discipline Meeting	Largo, FL	May 2008
Beckman Coulter Basic Biomek 3000 Customer Training	Orlando, FL	Jun. 2008
Hair Examination for the DNA Analyst	Morgantown, WV	Aug. 2007
Applied Biosystems 7500 Real Time PCR System: Quantifiler Kits and Standard Operator Training	Orlando, FL	Oct. 2006
FDLE Screening Forensic Technologist Training Program	Orlando, FL	Oct. 2006 to Nov. 2006
National Forensic Science Technology Center Pre-Screening Workshop	Largo, FL	May 2006
FDLE Forensic Technologist Training Program	Orlando, FL	Dec. 2005 to Jun. 2006
American Academy of Forensic Sciences Annual Meeting	Atlanta, GA	Feb. 2002

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Florida Circuit Courts: 5th Circuit, 7th Circuit, 9th Circuit (2), 18th Circuit and 19th Circuit	Serology	6

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist I	06/21/10 to Present
Florida Department of Law Enforcement	Crime Laboratory Analyst – Biology/DNA Section	12/2008 to 05/2010
Florida Department of Law Enforcement	Screening Forensic Technologist – Biology/DNA Section	11/2006 to 12/2008
Florida Department of Law Enforcement	Forensic Technologist – Biology, DNA Section	12/2005 to 11/2006

EMPLOYMENT HISTORY		
Employer	*Job Title*	*Date*
Florida Department of Law Enforcement	Intern – Toxicology Section	07/2004 to 12/2004

PROFESSIONAL AFFILIATIONS	
Organization	*Date(s)*
American Academy of Forensic Sciences, Associate Member, Criminalistics Section	2002 to Present

PUBLICATIONS / PRESENTATIONS:
University of Central Florida, Introduction to Forensics Class, "Forensic Biology" (Serology), Orlando, FL March 2010
Florida Department of Law Enforcement, Stetson University Forensics Class, "Forensic Biology," Orlando, FL April 2009

OTHER QUALIFICATIONS:

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY06/17/09
STATEMENT OF QUALIFICATIONS

Date: 06/24/10

Name: Eric S. Sahota P#: 9932 Classification: Forensic Scientist I

Current Discipline of Assignment: Latent Prints

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints	X	Crime Scene Investigations	X
Serology		Clandestine Laboratory Response Team	
Document Examination		DNA Analysis	
Quality Assurance		Technical Support /	

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
The Johns Hopkins University	09/96 - 05/03	Natural Sciences	BA

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
The Fingerprint Society Annual Conference 2010	London, UK	04/09/10-04/11/10
62nd Annual Scientific Meeting of the American Academy of Forensic Sciences	Seattle, WA	02/22/10-02/26/10
IVth Mediterranean Academy of Forensic Sciences Meeting	Antalya-Bleck, Turkey	10/14/09-10/18/09
Tri-Division IAI 4th Annual Training Conference	Las Vegas, NV	10/06/09-10/09/09
Southern California Assoc. of Fingerprint Officers 18th Annual Training Conference	Burbank, CA	10/02/09-10/03/09

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Canadian Identification Society 32nd Annual Training Conference	Vancouver, British Columbia, Canada	09/22/09-09/24/09
International Fingerprint Research Group 2009	Lausanne, Switzerland	06/29/09-07/03/09
Forensic Science for the 21st Century, ASU	Tempe, AZ	04/03/09-04/04/09
The Fingerprint Society Annual Conference 2009	Manchester, UK	03/20/09-03/22/09
Analysis of Distortion in Latent Prints	Las Vegas, NV	02/09/09-02/10/09
GWS-L Latent User Methods and Operations	Las Vegas, NV	09/17/08-09/18/08
IAI 93rd Educational Conference	Louisville, KY	8/18 - 8/22/08
Application of Statistics to Ridgeology And ACE-V Methodology	Las Vegas, NV	03/31/08-04/04/08
24-Hour Application Study in Forensic Photography	Las Vegas, NV	02/14/08
Finding Latent Evidence with Chemistry & Light	Henderson, NV	12/11/07-12/14/07
Advanced Palm Print Comparison	Fresno, CA	11/13/07-11/15/07
IAI 2nd Annual Tri-Division Conference	Salt Lake City, UT	11/05/07-11/09/07
SCAFO 16th Annual Training Conference	Riverside, CA	10/01/07-10/02/07
IAI 92nd Annual Educational Conference	San Diego, CA	07/22/07-07/28/07
Crime Scene Search, Documentation, & Recovery	Baltimore, MD	05/08/06-05/26/07

COURTROOM EXPERIENCE		
Court	*Discipline*	*Number of Times*
Circuit Court for Baltimore City	Crime Scene	3
United States Court District of Nevada	Latent Prints	1
Clark County District Court	Latent Prints	1
Clark County Grand Jury	Latent Prints	1

EMPLOYMENT HISTORY

Employer	*Job Title*	*Date*
Las Vegas Metropolitan Police Department	Forensic Scientist I	03/07-Present
Baltimore Police Department	Crime Lab Technician	09/05-03/07

PROFESSIONAL AFFILIATIONS

Organization	*Date(s)*
International Association for Identification	2007-Present
Canadian Identification Society	2007-Present
Fingerprint Society (UK)	2007-Present

PUBLICATIONS / PRESENTATIONS:

Presentations:

"Are Annotated Images a Solution for the Contemporaneous Documentation of Latent Print Examinations? MAFS IVth Annual Meeting, Belek, Turkey, October 2009.

"The NAS Report." Tri-Divisional IAI 4th Annual Training Conference, Las Vegas, NV, October 2009.

"Establishing the Frequency of Close Non-Matching Prints in AFIS." International Fingerprint Research Group Meeting, Lausanne, Switzerland 2009.

"Validating Latent Print Methodology," Sahota and Haines, IAI 93rd Annual Educational Conference, Louisville, KY 2008

"Meeting the Challenges of the Daubert Trilogy: Refining and Redefining the Reliability of Forensic Evidence," Merlino et. Al, *Tulsa Law Review*. (43) 2 2007

11/07/07 "Back to the Beginning: The Biological Basis for Latent Print Examination", IAI 2nd Tri-Division Conference Salt Lake City, UT

11/07/2007 "Who Moved My Print? Damaged, Disguised, Forged Fingerprints", IAI 2nd Tri-Division Conference Salt Lake City, UT

OTHER QUALIFICATIONS:

Executive Board Member, Canadian Identification Society 09/2009-09/2010.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
FORENSIC LABORATORY
STATEMENT OF QUALIFICATIONS

Date: 06/24/10

Name: Jan Seaman Kelly P#: 5666 Classification: Forensic Scientist II

Current Discipline of Assignment: Questioned Documents

EXPERIENCE IN THE FOLLOWING DISCIPLINE(S)			
Controlled Substances		Blood Alcohol	
Toolmarks		Breath Alcohol	
Trace Evidence		Arson Analysis	
Toxicology		Firearms	
Latent Prints		Crime Scene Investigations	
Serology		Clandestine Laboratory Response Team	
Document Examination	X	DNA Analysis	
Footwear Impressions	X	Technical Support /	
Quality Assurance			

EDUCATION

Institution	*Dates Attended*	*Major*	Degree Completed
University of Central Oklahoma	9/83 thru 5/85	Criminal Justice	B.A.
South Oklahoma City Jr. College	9/82 thru 5/83	Registered Nursing	A.S.
Tulsa Jr. College	9/75 thru 5/76	Police Science	A.S.

ADDITIONAL TRAINING / SEMINARS

Course / Seminar	*Location*	*Dates*
Training on VSC-400 by Foster & Freeman	Las Vegas, NV	05/22/09
Foster & Freeman – SICAR Training	Las Vegas, NV	02/09/09
ST2AR Fall Workshop	Las Vegas, NV	10/20-10/24/08
Forensic Photography	Las Vegas, NV	02/14/08
Forensic Imaging Techniques	Las Vegas, NV	01/08

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Leadership Skills for Challenging Times	Las Vegas, NV	07/16/07-07/19/07
Apprenticeship – Footwear Impression Evidence	Las Vegas, NV	02/06 thru 02/07
ABFDE Recertification	Las Vegas, NV	11/06
ABFDE Workshops	Las Vegas, NV	11/05
Mistake-Free Grammar and Proof Reading	Las Vegas, NV	06/05
Mideo Systems by Gary Crawford	Las Vegas, NV	06/05
Footwear Impression Examination Course - FBI	Quantico, VA	04/05
Examination and Comparison of Footwear Impressions - Nevada State Division of the International Association for Identification	Las Vegas, NV	03/05
Collection and Preservation of Footwear Impressions - Nevada State Division of the International Association for Identification	Las Vegas, NV	03/05
Initial Training on Mideo	Las Vegas, NV	01/05
ABFDE Daubert Seminar	Las Vegas, NV	10/04
ABFDE Workshop	Las Vegas, NV	10/04
Check 21 by Wells Fargo Bank	Las Vegas, NV	09/04
Train the Raters	Las Vegas, NV	09/04
Cultural Awareness	Las Vegas, NV	09/04
Swimming Thru the Sea of Payroll Forms	Las Vegas, NV	08/04
Requisition Processing	Las Vegas, NV	08/04
Problem Solving, Independent Decision Making Alt	Las Vegas, NV	08/04
Developing Your Employees Potential Alt	Las Vegas, NV	05/04
Acting Supervisor Class	Las Vegas, NV	3/04
Stress Management	Las Vegas, NV	03/04
Employment Diversity, Harassment, Discrimination - EEOC	Las Vegas, NV	02/04

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
Creating a Positive Work Environment	Las Vegas, NV	02/04
QD Section Meeting - AAFS	Dallas, TX	02/04
Adobe Photoshop for Document Examiners - AAFS Meeting	Dallas, TX	02/04
Highly Effective Meetings	Las Vegas, NV	01/04
The Detection, Recovery and Examnation of Foorwear Impression Evidence - William Bodziak	Jacksonville, FL	11/03
American Society of Questioned Document Examiners (ASQDE) Meeting	San Diego, Ca	08/02
International Association for Identification - 87th International Educational Conference	Las Vegas, NV	08/02
Digital Imaging Workshop	Las Vegas, NV	10/01
Digital Imaging Workshop	Las Vegas, NV	09/01
American Society of Questioned Document Examiners (ASQDE)	Ottawa, Canada	08/00
American Academy of Forensic Sciences	Reno, NV	02/00
Canon Workshop (ABFDE sponsored)	Atlanta, GA	10/99
National Forensic Science Technology Center Laboratory Auditing Course	Las Vegas, NV	06/99
SWAFDE Workshop	Las Vegas, NV	04/99
ASQDE meeting	Indianapolis, IN	08/98
ABFDE Workshop	Las Vegas, NV	06/98
Graffiti Investigations & Vandalism	Las Vegas, NV	04/98
AAFS meeting	San Francisco, CA	02/98
Computer Seizure (CAT/NWAFS/SWAFS/SAT)	Las Vegas, NV	11/97
ASQDE meeting	Washington, DC	08/96
AAFS meeting (Digital Imaging and Infra-red Workshops)	Nashville, TN	02/96

ADDITIONAL TRAINING / SEMINARS		
Course / Seminar	*Location*	*Dates*
SWAFDE meeting	San Diego, CA	04/95
AAFS meeting	Seattle, WA	02/95
AAFS meeting (Typewriter and Paper Fracture Workshops)	San Antonio, TX	02/94
SWAFDE meeting	Albuquerque, NM	10/93
AAFS meeting	Boston, MA	02/93
SWAFDE meeting (Mead Paper Workshop)	Denver, CO	10/92
SWAFDE meeting	San Diego, CA	04/92
SWAFDE meeting	Phoenix, AZ	10/91
ASQDE meeting	Orlando, FL	08/91
AAFS meeting	Anaheim, CA	02/91
SWAFDE meeting	Long Beach, CA	10/90
SWAFDE meeting	Park City, UT	04/90
American Academy of Forensic Sciences (AAFS)	Cincinnati, OH	02/90
SWAFDE meeting	Oakland, CA	10/89
SWAFDE meeting	Tucson, AZ	04/89
SWAFDE meeting	Aurora, CO	09/88
Apprenticeship with U.S. Postal Service Crime Laboratory - two year	San Bruno, CA	01/87 thru 01/89
SWAFDE meeting	Palm Springs, CA	10/87
FBI Questioned Document School	Quantico, VA	08/87
Southwest Association of Forensic Document Examiners (SWAFDE) meeting	Sante Fe, NM	05/87
Arizona DPS Document Laboratory	AZ	07/86
Questioned Document Course: Secret Service	Glynco, GA	03/86