

FIRST DEGREE KIDNAPPING

- Defendant is keeping his contact with J [REDACTED] secret from the beginning
- Switch to KIK application
- Asking J [REDACTED] to be his girlfriend but never visiting her at her home
- Secret meetings at Onlet House & Skating Rink
- Picking J [REDACTED] up from a shopping mall the weekend before school started to spend the night with him

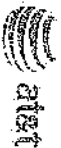
FIRST DEGREE KIDNAPPING

- Defendant's desire to keep his contact with J [redacted] secret from J [redacted] mom does not change when he picks her up on 8/29/13:

- Picked up in middle of the night
- Picked up down the street from J [redacted] home
- Defendant admitted when testifying her that he knew J [redacted] mother did not know she was leaving
- Defendant has J [redacted] bring her Birth Certificate and Social Security Card with her
- J [redacted] turns her phone and computer off as soon as gets to Defendant's home
- Defendant changes his phone number in early morning of 8/29/13

1809310
10/16/2015

SUBSCRIBER INFORMATION



10662097

C/T

Financially Unable Party

Name: NEWBY & SPOONER
Credit Address: 1700 LICH AVE SE APT 512, NORFOLK, VA 77071

Subscriber Since: 01/09/1998

Photo ID: 1001
Photo ID Number: 1001

DOB: 05/01

SSN: 1001

Current Home Phone: 757-206-1100
Current Home Phone: 757-206-1100
Contact Work Email: 1001

BILLING PARTY

Account Number: 10662097

Name: NEWBY & SPOONER

Billing Address: 1700 LICH AVE SE APT 512, NORFOLK, VA 77071

Account Status: Closed

Billing Cycle: 24

User Information

Full Name: NEWBY & SPOONER

Current Address: 1700 LICH AVE SE APT 512, NORFOLK, VA 77071

Home Phone: 757-206-1100

Work Address: 1700 LICH AVE APT 5, NORFOLK, VA 77071

Payment Start Date: 01/09/2001

Payment Type: Monthly

Current Party: NEWBY & SPOONER

Contact Home Phone: 757-206-1100

Contact Home Email: 1001

Service Change History

Service Change Reason: 1001

Service Change Date: 05/29/2013

Bill of Service
Customer Request
Service Request
Service Request

05/29/2013
06/29/2013
07/29/2013
08/29/2013

01

AT&T PROPRIETARY

Page 1

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FIRST DEGREE KIDNAPPING

- Defendant tells J [REDACTED] to stay in his house all day so no one will see her
- When Defendant takes J [REDACTED] out of the house, she is caused to dress in baggie clothes and glasses to conceal her identity
- Not even Defendant's landlord knew J [REDACTED] was living at his house
- Defendant developed a plan with J [REDACTED] as to what they would do if anyone ever found J [REDACTED] at his house (If J [REDACTED] is taken away — she should keep coming back)

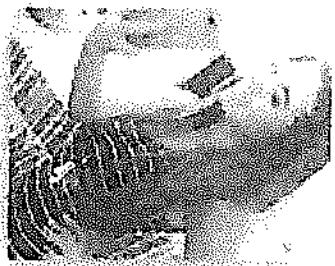
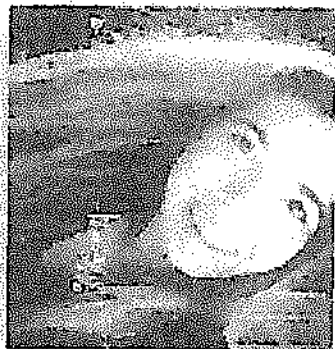
FIRST DEGREE KIDNAPPING

- Defendant knew J [REDACTED] a's mother was looking for her but did not seek to let her know where J [REDACTED] was



MISSING DESAPARECIDA

HENDERSON, NEVADA



J

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AGE 16

Age 16, was last seen on August 28, 2013 in Henderson, NV. She is 5'4" tall, weighs 110 lbs, has brown eyes, and brown hair.

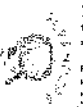
If you have any information contact

Detective Charles Gates at the Henderson Police Department (702) 267-4797 or Private Investigator Luis Orellana (818) 242-0130.

de 16 años, fue vista por última vez el 28 de agosto de 2013 en Henderson, NV. Ella es 5'4" de estatura, pesa 110 libras, tiene ojos marrones y cabello castaño. Si usted tiene alguna información comuníquese con Detective Charles Gates al the Henderson Police Department (702) 267-4797 o Privado Investigador Luis Orellana (818) 242-0130.

www.cfaunmissing.org

Can also contact CEO/Founder Chuck Foreman directly (512) 644-9856



Text strings

CF13048Hitachi HDD\Unallocated Clusters

MOORE 69 RESULTS Any time
6 people are searching for
Are you looking for
n/a's contact info including address, phone number, relatives and other ...
- Las Vegas, NV | MyLife ...
Instantly view

Added Aug 17, 2012 me singing the fighter by own class heroes ... 2:49 seconds - by one
republic cover with a twist by ... 4:26 views

on Myspace <https://myspace.com/> res Mixes ConnectionsPhotobstream

"missingkids" link viewed on this computer

www.missingkids.com/misingkids/service/PublicCaseSearchService.aspx

DOB:

Age Now: 16 Missing: Aug 28, 2013 Missing From: HENDERSON NV United States Sex: Female
Race: Biracial Hair: Brown and Feather Offbeat, it's possible, by Terry
Help String Home. Last Name: First Name: Nick Name: Age: 16

Gender: FEMALE Height: 5'9 Weight: 119 lbs Eyes: BROWN Hair: BROWN Complexion: FAIR Race:

Hispanic Date of Last Contact: AUGUST 29, 2013 Boars, Marys, Tattoos: BIRTHMARK UNDER RIGHT EYE
WAS LAST SEEN IN THE AREA OF MILLINEY RANCH AND SUNSET ... WAS LAST SEEN

WEARING PANTS, SHIRT AND WHITE COLLARED SHIRT AND A BLACK TANK TOP. SHE MAYBE CARRYING A
NAVY BLUE AND WHITE BACKPACK WITH PERSONAL BELONGINGS. SHE HAS A BIRTHMARK UNDER HER RIGHT EYE
PLEASE IF YOU HAVE ANY INFORMATION AT ALL. ANY LITTLE BIT CAN HELP BRING HER HOME. PLEASE
CONTACT THE NUMBERS BELOW. NEVADA CHILD SERVICES (702) 455-7009 HENDERSON POLICE DEPARTMENT
(702) 267-5009

FIRST DEGREE KIDNAPPING

■ When asked if Defendant knew where J [REDACTED] was by police and private investigators, Defendant said he didn't know at the same time. J [REDACTED] was living at his house (Defendant said he never met J [REDACTED])

- Private Investigator
- Detective Logudice
- Officer Abbott / Detective Platt
- Detective Platt / Detective Caldwell

FIRST DEGREE KIDNAPPING

- There is no question Defendant proactively sought to KEEP J [REDACTED] concealed from her mother based upon the evidence we discussed
- But we have more evidence which indicates Defendant's Intent to Keep J [REDACTED] from her mother
- We are talking about the January 2015 incident

FIRST DEGREE KIDNAPPING

Jury Instruction 22

During the course of the trial, you have heard evidence pertaining to allegations that defendant engaged in some other wrongs or bad conduct, other than those for which he is on trial. Evidence that the defendant committed offenses or engaged in bad conduct, other than that for which he is on trial, if believed, was not received and may not be considered by you to prove that he is a person of bad character or to prove that he has a disposition to commit crimes. Such evidence was received and may be considered by you only for the limited purpose(s) of proving the defendant's motive, intent, plan and preparation in committing the charged crimes.

You must weigh this evidence in the same manner as you do all other evidence in the case.

FIRST DEGREE KIDNAPPING

- On January 2, 2015, Defendant contacted J [REDACTED] via Instagram
- Evidence is pretty strong this contact was made
 - Information in the contacts
 - Vanity Names in Contacts Connected to Defendant's E-Mail address
 - IP address from which contacts sent comes back to motel in Oklahoma which Defendant was registered in at the time of the contacts and which was just a few miles from his then home

FIRST DEGREE KIDNAPPING

- As Defendant testified here, he indicated he didn't contact J [REDACTED] in January 2015
- He supposes a girl he met at a bar and who stayed with him at the motel for about two days contacted her
- Does that even make sense?

FIRST DEGREE KIDNAPPING

- Why did Defendant contact J [REDACTED]

- THE PLAN

- Did Defendant want J [REDACTED]'s mother to know about his contact with her daughter?

5:15 PM

AUDREY_



9:39 PM

LISA_THOMAS04



9:16 PM

LISA_THOMAS04



9:58 PM

NOWAYYDUDESS



FIRST DEGREE KIDNAPPING

- Defendant proactively sought to KEEP J [REDACTED] concealed from her mother

FIRST DEGREE KIDNAPPING

- Every Person who leads, takes, entices or carries away or detains a minor with the intent to:
 - (1) Keep, imprison, or confine him or her from his or her parents, guardian, or any other person having lawful custody of the minor; or
 - (2) Perpetrate upon the person of the minor any unlawful act
- is guilty of Kidnapping in the First Degree

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FIRST DEGREE KIDNAPPING

- It is alleged that Defendant performed the ACT of leading, taking, enticing or carrying away or detaining Jaysema with the intent to perpetrate upon the person of Jaysema the unlawful acts of Child Abuse with Substantial Mental Harm and/or Contributing to the Delinquency of a Minor.

CONTRIBUTING TO THE DELINQUENCY OF A MINOR

Jury Instruction 12

A person is guilty of Contributing to the Delinquency of a Minor if he or she:

- 2) Endeavors to induce any person under the age of 18 to perform any act or to follow any course of conduct or to so live as would cause or manifestly tend to cause any such person to become or to remain a person who is a "neglected child", "child in need of supervision" or "delinquent child"

CONTRIBUTING TO THE DELINQUENCY OF A MINOR

■ Jury Instruction 12

■ A "neglected child", "child in need of supervision" or "delinquent child" includes a person less than 18 years of age:

■ 1) Who persistently or habitually refuses to obey the reasonable and proper orders or directions of his parents, guardian or custodian, or who is beyond the control of such persons; or

■ 2) Who is a habitual truant from school; or

■ 3) Who is leading, or from any cause is in danger of leading, an idle, dissolute, lewd or immoral life

FIRST DEGREE KIDNAPPING

- It is alleged that Defendant perform the ACT of leading, taking, enticing or carrying away or detaining Jaysenia with the intent to perpetrate upon the person of Jaysenia the unlawful acts of Child Abuse with Substantial Mental Harm and/or Contributing to the Delinquency of a Minor.

FIRST DEGREE KIDNAPPING

- It is alleged that Defendant perform the ACT of leading, talking, enticing or carrying away or detaining Jaysenia with the intent to perpetrate upon the person of Jaysenia the unlawful acts of Child Abuse with Substantial Mental Harm and/or Contributing to the Delinquency of a Minor.

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

■ Jury Instruction 10

- A person who willfully, unlawfully and feloniously causes a child under the age of 18 years to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where the child may suffer physical pain or mental suffering as a result of abuse or neglect is guilty of Child abuse, neglect or endangerment.

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

- Jury Instruction 10
- A person who willfully, unlawfully and feloniously causes a child under the age of 18 years to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect or to be placed in a situation where the child may suffer physical pain or mental suffering as a result of abuse or neglect is guilty of Child abuse, neglect or endangerment.

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CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

- Clearly J [REDACTED] was placed in a situation in which she either suffered or might suffer mental suffering

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

- Jury Instruction 11

- Abuse and Neglect includes mental injury of a non-accidental nature and negligent treatment or maltreatment of a child

CHILD ABUSE, NEGLECT OR ENDANGERMENT

■ Jury Instruction 11

- Abuse and Neglect includes mental injury of a non-accidental nature and negligent treatment or maltreatment of a child

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

■ Jury Instruction 11

■ “Negligent Treatment” or “Maltreatment of a Child” occurs if the child has been abandoned, is without proper care, control or supervision or lacks subsistence, education, shelter, medical care or other care necessary for the well-being of the child because of the faults or habits of the person responsible for the welfare of the child or the neglect or refusal of the person to provide them when able to do so.

CHILD ABUSE, NEGLECT OR ENDANGERMENT

■ What is the evidence of negligent treatment or maltreatment of J [REDACTED] while staying at Defendant's house in this case?

■ Lack of Education (Defendant's plan was that she would not go to school) [REDACTED]

■ Proper Care, Control and Supervision (Non-existent supervision or care = isolation; controlling and demeaning conduct directed at J [REDACTED])

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

■ Jury Instruction 11

- Abuse and Neglect includes mental injury of a non-accidental nature and negligent treatment or maltreatment of a child

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

■ Jury Instruction 11

- Abuse and Neglect includes mental injury
of a non-accidental nature and negligent
treatment or maltreatment of a child

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

- Did the time J [REDACTED] was caused to stay with Defendant result in a mental injury to J [REDACTED]
- You heard J [REDACTED] and J [REDACTED]'s mother tell you this has forever changed her

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

- Which events resulted in J[REDACTED]'s mental injury:
 - Complete Isolation
 - At 16, sleeping in the same bed as a 44 year old man and engaging in sexual intercourse
 - No School
 - Defendant engaging in demeaning and controlling behavior toward J[REDACTED]
- J[REDACTED] told you all of these things had a significant negative mental impact upon her

CHILD ABUSE, NEGLECT OR ENDANGERMENT

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- Abuse and Neglect includes mental injury of a non-accidental nature and negligent treatment or maltreatment of a child

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

Jury Instruction 11

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CHILD ABUSE, NEGLECT OR ENDANGERMENT

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CHILD ABUSE, NEGLECT OR ENDANGERMENT

■ Jury Instruction 10

- If the child is found to have suffered substantial mental harm as a result of the abuse or neglect, the person is guilty of child abuse, neglect or endangerment with substantial mental harm

CHILD ABUSE, NEGLECT OR ENDANGERMENT

■ Jury Instruction 11

- “Substantial Mental Harm” means an injury to the intellectual or psychological capacity or the emotional condition of a child as evidenced by an observable and substantial impairment of the ability of the child to function within his or her normal range of performance or behavior.

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

- What do we know about J [REDACTED]?
- Prior to Defendant, J [REDACTED] is a normal teen with normal mother/daughter problems
- Her return from Defendant's residence
 - No concern for her family
- Her admission to Montevista (11/2/13 – 11/11/13)
 - All she wanted to talk about was her 44 year old boyfriend

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

- Her return to her home after 11/2/13 admission to Montevista
 - Attempted to jump off second story balcony
 - Taken to the hospital in an ambulance
- Her second admission to Montevista (11/16/13 - 12/4/13)
 - Not as focused on Defendant as just generally upset

CHILD ABUSE, NEGLECT OR ENDANGERMENT

- Her return home after her second admission to Montevista as she waited for her long term treatment
 - Told Mother about pornographic photos
 - Told Mother "I wish you would have found me sooner. I did not know how to leave."
- Long Term inpatient treatment
 - only 5% to 10% of Montevista Clients ever require Long Term Inpatient treatment

CHILD ABUSE, NEGLIGENCE OR ENDANGERMENT

- Counseling after Long Term Inpatient focused on various issues including:
 - Prior isolation of J [REDACTED] for two months
 - Difficulty in transitioning for high school to college due to her concern that people at her college would find out about what Defendant did to her
 - Coming to Court and people finding out about her being associated with this case
 - Coming to Court and having to face Defendant

CHILD ABUSE, NEGLECT OR ENDANGERMENT

■ Jury Instruction

- “Substantial Mental Harm” means an injury to the intellectual or psychological capacity or the emotional condition of a child as evidenced by an observable and substantial impairment of the ability of the child to function within his or her normal range of performance or behavior

CHILD ABUSE, NEGLECT OR ENDANGERMENT

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FIRST DEGREE KIDNAPPING

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 - (1) Keep, imprison, or confine him or her from his or her parents, guardian, or any other person having lawful custody of the minor; or
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UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

■ Jury Instruction 13

- A person who knowingly uses, encourages, entices, coerces or permits a minor to be the subject of a sexual portrayal in the performance is guilty of Use of a Minor in Production of Pornography

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

■ Jury Instruction 13

- A person who knowingly uses, encourages, entices, coerces or permits a minor to be the subject of a sexual portrayal in the performance is guilty of Use of a Minor in Production of Pornography

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UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- In this case we have a number of photos that were taken by J [REDACTED] with her phone and forwarded to Defendant
 - (Exhibits 24 - 28)
 - Portion of photos taken on 4 different occasions
- There is no doubt Defendant got them
- They are found in his cell phone and computer

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- Two questions to answer in determining if Defendant is culpable
- 1) Did Defendant knowingly use, encourage, entice, coerce or permit J [REDACTED] to be the subject of the photos?
- 2) Do the photos constitute a sexual portrayal in a performance?

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- Defendant originally asked J [REDACTED] to send him a sexy photo
- Based upon that she took photos and forwarded them to Defendant
 - Count 3 / Exhibits 25 and 28
 - (views of front and back in underwear and bra; View of behind, in underwear, bent over a chair exposing buttocks; and underwear on and legs spread exposing vaginal area)
- Defendant Got what he asked for

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- Defendant asked J [REDACTED] to send him similar photos on three other occasions:
- Count 4 / Exhibit 26 (bare breasts and underwear)
- Count 5 / Exhibit 24 (underwear on and legs spread exposing vaginal area)
- Count 6 / Exhibit 27 (bare buttocks)

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- Defendant clearly used, encouraged, enticed, or permitted J. [REDACTED] to be the subject of the photos

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- Two questions to answer in determining if Defendant is culpable
- 1) Did Defendant knowingly use, encourage, entice, coerce or permit J. [REDACTED] to be the subject of the photos?
- 2) Do the photos constitute a sexual portrayal in a performance?

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

■ Jury Instruction 16

■ “Performance” means any play, film, photograph, computer-generated image, electronic representation, dance, or other visual presentation.

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

Jury Instruction 14

“Sexual Portrayal” means the depiction of a person in a manner which appeals to the prurient interest in sex and which does not have serious literary, artistic, political or scientific value.

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

Jury Instruction 21

Although you are to consider only the evidence in the case in reaching a verdict, you must bring to the consideration of the evidence your everyday common sense and judgment as reasonable men and women. Thus, you are not limited solely to what you see and hear as the witnesses testify. You may draw reasonable inferences from the evidence which you feel are justified in light of common experience, keeping in mind that such inferences should not be based on speculation or guess.

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- Do these photos have serious value or purpose?
 - Expression of art?
 - School project?
- Add for clothing to be published in J.C. Penney's Catalog?

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- The purpose of J [REDACTED] taking these photos is due to their appeal to a prurient interest in sex
- How do we know that this is the central reason for these photos to be taken
 - Defendant initially asks her to send him a sexy picture
 - Defendant then directs her into various sexual poses
 - Defendant directs her to take items of clothing off
 - Defendant clearly had a sexual interest in Jaysenia

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- There is no question as to the purpose of these photos
- The reason for these photos, from beginning to end, is their appeal to the prurient interest in sex

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- Jury Instruction 13
- A person who knowingly uses, encourages, entices, coerces or permits a minor to be the subject of a sexual portrayal in the performance is guilty of Use of a Minor in Production of Pornography

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

■ Jury Instruction 13

- A person who knowingly uses, encourages, entices or permits a minor to simulate or engage in or assist others to simulate or engage in sexual conduct to produce a performance is guilty of Use of a Minor in Production of Pornography

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

- Count 5 alleges engaging or simulating sexual conduct in addition to being the subject of a sexual portrayal
- Count 5 / Exhibit 24 (underwear on and legs spread exposing vaginal area)

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

Jury Instruction 15

“Sexual Conduct” means sexual intercourse, lewd exhibition of the genitals, fellatio, cunnilingus, bestiality, anal intercourse, excretion, sado-masochistic abuse, masturbation, or the penetration of any part of a person’s body or of any object manipulated or inserted by a person into the anal opening of the body of another

UNLAWFUL USE OF A MINOR IN PORNOGRAPHY

■ Jury Instruction 13

- A person who knowingly encourages, entices or permits a minor to simulate or engage in or assist others to simulate or engage in sexual conduct to produce a performance is guilty of Minor In Production Pornography

CRIMES WITH WHICH DEFENDANT IS CHARGED

- First Degree Kidnapping (Count 1)
- Child Abuse, Neglect, or Endangerment with Substantial Mental Harm (Count 2)
- Unlawful Use of a Minor in the Production of Pornography (Counts 3, 4, 5, and 6)

STATE OF NEVADA

VS

MELVYN PERRY
SPROWSON, JR.

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MELVYN SPROWSON,) No. 73674
)
 Appellant,)
)
 vi.)
)
 THE STATE OF NEVADA,)
)
 Respondent.)
 _____)

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STEVE WOLFSON
Clark County District Attorney
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Las Vegas, Nevada 89155

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100 North Carson Street
Carson City, Nevada 89701-4717
(702) 687-3538

Counsel for Respondent

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DEBORAH L. WESTBROOK
HOWARD S. BROOKS

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2324
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FIRST DEGREE KIDNAPPING

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 - (2) Perpetrate upon the person of the minor any unlawful act
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FIRST DEGREE KIDNAPPING

■ Jury Instruction 9

- While a guilty verdict must be unanimous, you need not be unanimous on the means or the theory of First Degree Kidnapping in arriving at your verdict

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FIRST DEGREE KIDNAPPING

- First, what does this first element of First Degree Kidnapping not require?
- There is NO REQUIREMENT that Defendant leads, takes, entices or carries away or detains a minor against the minor's will

FIRST DEGREE KIDNAPING

- The Question is: Did Defendant perform the ACT of:
 - LEADING AWAY
 - TAKING AWAY
 - ENTICING AWAY
 - CARRYING AWAY
 - DETAINING
- A finding of any one of these acts satisfies this element of the crime.

FIRST DEGREE KIDNAPPING

- Undisputed that Defendant picked up Jaysenia from the residence she shared with her family in the early morning hours of 8/29/13
- He drove his car to the area of her residence
- Pursuant to the agreement they made earlier that evening, he picked her up down the street from her home (clearly to avoid detection) in Defendant's car
- Defendant took J [REDACTED] directly to his residence

FIRST DEGREE KIDNAPPING

- Defendant clearly perform the ACTs of:
 - LEADING AWAY
 - TAKING AWAY
 - ENTICING AWAY
 - CARRYING AWAY
 - DETAINING
- You only need one of these acts to satisfy this element of the crime

FIRST DEGREE KIDNAPPING

■ What about LEADING AWAY and ENTICING AWAY?

■ Are these elements satisfied as well?

■ Think about Defendant's contact with J [REDACTED] leading up to his removal of J [REDACTED] from her residence

■ Would J [REDACTED] have left with Defendant the first day she made contact with him?

■ It was Defendant's conduct that caused J [REDACTED] to leave with him

FIRST DEGREE KIDNAPPING

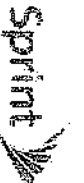
- A very short time after beginning to talk to J [REDACTED] Defendant asks J [REDACTED] to be his "GIRLFRIEND"
- Defendant contacted J [REDACTED] often over the telephone and had long conversations

(978) 270-7893

Where Do I Begin?

Customer	Account Number	Bill Period	Bill Date
John Smith	169-557637	for 19-Aug to Aug 17, 2013	

Line	Date	Time	Phone Number	Call Description	Rate Type	Minutes Used	Total Charges
1	09/20	02:17 AM	708-472-4525	US WGS65-INT	PRVWGRAD	1.69	
2	09/20	02:18 AM	708-472-4525	US WGS65-INT	PRVWGRAD	1.50	
3	09/20	12:27 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.07	
4	09/20	12:30 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.06	
5	09/20	12:30 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.03	
6	09/20	12:40 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.06	
7	09/20	12:40 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.06	
8	09/20	12:50 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.03	
9	09/20	12:50 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.03	
10	09/21	02:20 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.07	
11	09/21	02:20 PM	708-472-4086	US WGS65-INT	PRVWGRAD	1.07	
12	09/21	02:31 PM	590-440-9680	BROADBAND	PRVWGRAD	4.50	
13	09/21	02:31 PM	590-440-9680	BROADBAND	PRVWGRAD	2.00	
14	09/21	03:56 PM	708-472-4525	US WGS65-INT	PRVWGRAD	3.59	
15	09/22	07:20 PM	708-472-4525	US WGS65-INT	PRVWGRAD	2.00	
16	09/23	08:15 PM	566-723-0642	PRVWGRAD	PRVWGRAD	2.00	
17	09/23	08:16 PM	566-723-0642	PRVWGRAD	PRVWGRAD	1.09	
18	09/23	08:17 PM	566-723-0642	PRVWGRAD	PRVWGRAD	1.06	
19	09/23	08:20 PM	646-613-0842	PRVWGRAD	PRVWGRAD	1.07	
20	09/23	08:23 PM	646-613-0842	PRVWGRAD	PRVWGRAD	1.06	
21	09/23	08:26 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	3.00	
22	09/24	10:31 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	10.00	
23	09/24	10:34 PM	312-927-6008	PRVWGRAD	PRVWGRAD	2.50	
24	09/24	10:34 PM	312-925-5230	PRVWGRAD	PRVWGRAD	11.00	
25	09/24	09:39 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	1.00	
26	09/24	09:34 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	1.00	
27	09/24	09:35 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	1.00	
28	09/24	09:38 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	3.00	
29	09/24	09:44 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	6.00	
30	09/24	09:53 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	2.00	
31	09/24	10:56 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	6.00	
32	09/24	10:57 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	7.00	
33	09/24	10:58 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	1.00	
34	09/24	10:59 PM	312-925-5230	CHICAGO-IL	PRVWGRAD	1.00	
35	09/24	12:56 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.03	
36	09/24	01:01 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.03	
37	09/24	09:41 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
38	09/24	10:00 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
39	09/24	10:01 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
40	09/24	10:02 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
41	09/24	10:03 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
42	09/24	10:04 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
43	09/24	10:05 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
44	09/24	10:06 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
45	09/24	10:07 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
46	09/24	10:08 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
47	09/24	10:09 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
48	09/24	10:10 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
49	09/24	10:11 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	
50	09/24	10:12 PM	708-472-4525	US WGS65-INT	PRVWGRAD	1.00	



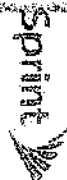
2015

(978) 230-7892 (Continued)

Voice Call Desires

Customer	Account Number	Bill Period	Bill Date
Greer Smith	6015572642	Jul 18 - Aug 18	Aug 27, 2018

Date		Time	Phone Number	Cell Destination	Rate Type	Minutes Used	Total Charges
06	08:00	03:04 PM	702-472-5255	LAS VEGAS, NV	STANDARD	7:26	
47	09:01	10:31 PM	702-472-6056	LAS VEGAS, NV	STANDARD	4:00	
48	09:05	09:55 AM	702-472-6056	LAS VEGAS, NV	STANDARD	1:32	
49	09:05	09:56 AM	702-472-6056	LAS VEGAS, NV	STANDARD	4:00	
50	09:05	09:07 AM	702-472-6056	LAS VEGAS, NV	STANDARD	2:20	
51	09:05	07:29 AM	702-472-6056	Intercom	STANDARD	2:00	
52	09:05	10:39 AM	702-472-6056	Intercom	STANDARD	1:00	
53	09:05	12:08 PM	702-472-6056	LAS VEGAS, NV	STANDARD	1:00	
54	09:05	12:31 PM	702-472-6056	LAS VEGAS, NV	STANDARD	1:00	
55	09:05	12:35 PM	702-472-6056	LAS VEGAS, NV	STANDARD	1:00	
56	09:05	12:36 PM	702-472-6056	LAS VEGAS, NV	STANDARD	1:00	
57	09:05	12:37 PM	702-472-6056	LAS VEGAS, NV	STANDARD	2:00	
58	09:05	12:49 PM	702-472-6056	LAS VEGAS, NV	STANDARD	1:00	
59	09:05	12:52 PM	702-472-6056	Intercom	STANDARD	4:00	
60	09:05	12:52 PM	702-472-6056	LAS VEGAS, NV	STANDARD	1:00	
61	09:05	12:57 PM	702-472-6056	LAS VEGAS, NV	STANDARD	1:00	
62	09:05	10:31 PM	912-558-8953	Intercom	STANDARD	2:00	
63	09:06	11:05 AM	857-919-8040	BIRMINGHAM, AL	STANDARD	1:00	
64	09:07	11:08 PM	912-558-1352	Intercom	STANDARD	1:00	
65	09:08	11:10 PM	616-298-1355	Intercom	STANDARD	3:00	
66	09:08	03:06 PM	616-298-1365	Intercom	STANDARD	2:00	
67	09:09	07:57 PM	616-298-1355	Intercom	STANDARD	22:00	
68	09:09	09:44 PM	616-298-1365	Intercom	STANDARD	1:00	
69	09:09	09:44 PM	616-298-1365	INTERMEDIATE	STANDARD	1:00	
70	09:10	03:02 PM	616-298-1365	Intercom	STANDARD	15:00	
71	09:10	08:26 PM	616-298-1365	Intercom	STANDARD	4:00	
72	09:10	11:32 PM	616-298-1365	Intercom	STANDARD	67:00	
73	09:11	05:02 PM	616-298-1365	Intercom	STANDARD	2:00	
74	09:12	11:59 PM	616-298-1365	Intercom	STANDARD	1:00	
75	09:13	09:47 PM	702-472-6055	LAS VEGAS, NV	STANDARD	1:00	
76	09:13	03:40 PM	702-472-6055	LAS VEGAS, NV	STANDARD	1:00	
77	09:13	11:54 PM	616-298-1365	Intercom	STANDARD	1:00	
78	09:16	11:39 PM	616-298-1365	Intercom	STANDARD	1:00	
79	09:17	04:51 PM	616-298-1365	Intercom	STANDARD	13:00	
80	09:17	04:51 PM	616-298-1365	Intercom	STANDARD	14:00	
81	09:17	04:51 PM	616-298-1365	Intercom	STANDARD	1:00	
82	09:17	04:51 PM	616-298-1365	Intercom	STANDARD	1:00	
83	09:18	04:02 PM	702-572-8061	LAS VEGAS, NV	STANDARD	2:00	
84	09:18	04:02 PM	702-572-8061	LAS VEGAS, NV	STANDARD	1:00	
85	09:18	04:02 PM	702-572-8061	Intercom	STANDARD	2:00	
86	09:18	04:02 PM	616-298-1365	Intercom	STANDARD	15:00	
87	09:18	05:08 PM	702-472-6056	LAS VEGAS, NV	STANDARD	1:00	
88	09:18	05:12 PM	857-919-8040	BIRMINGHAM, AL	STANDARD	1:00	
89	09:18	05:15 PM	857-919-8040	BIRMINGHAM, AL	STANDARD	1:00	



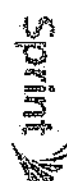
Call details

(978) 210-7893

Customer: **Account Number** 661557682 **Bill Period** Aug 10 - Sep 18 **Bill Date** Sep 22, 2013

Voice Call Details

Date	Time	Phone Number	Call Direction	Rate Type	Minutes Used	Total Charges
1	08:00	08:55 AM	702-472-5525	US VEGAS, NV	1:00	
2	08:10	09:56 AM	702-472-5525	US VEGAS, NV	7:30	
3	08:20	09:04 PM	702-472-5525	US VEGAS, NV	1:00	
4	08:30	09:24 PM	702-472-5525	US VEGAS, NV	3:30	
5	08:40	08:21 PM	702-472-5525	US VEGAS, NV	1:00	
6	08:51	08:34 PM	702-472-5525	US VEGAS, NV	1:00	
7	08:53	08:40 PM	702-472-5525	US VEGAS, NV	1:00	
8	08:57	08:48 PM	702-472-5525	US VEGAS, NV	3:30	
9	09:02	08:18 PM	702-472-5525	US VEGAS, NV	1:00	
10	09:02	08:18 PM	702-472-5525	US VEGAS, NV	1:00	
11	09:02	08:07 PM	702-472-5525	US VEGAS, NV	2:00	
12	09:12	08:08 PM	702-472-5525	US VEGAS, NV	1:00	
13	09:22	09:33 PM	702-472-5525	US VEGAS, NV	7:00	
14	09:33	09:21 AM	702-472-5525	US VEGAS, NV	7:00	
15	09:33	09:21 AM	702-472-5525	US VEGAS, NV	14:00	
16	09:33	11:32 AM	702-472-5525	US VEGAS, NV	5:00	
17	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
18	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
19	09:33	11:32 AM	702-472-5525	US VEGAS, NV	3:00	
20	09:33	11:32 AM	702-472-5525	US VEGAS, NV	7:00	
21	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
22	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
23	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
24	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
25	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
26	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
27	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
28	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
29	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
30	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
31	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
32	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
33	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
34	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
35	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
36	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
37	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
38	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
39	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
40	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
41	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
42	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
43	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	
44	09:33	11:32 AM	702-472-5525	US VEGAS, NV	1:00	



Call details

(978) 210-7893 (continued)

Customer: **Account Number** 661557682 **Bill Period** Aug 10 - Sep 18 **Bill Date** Sep 22, 2013

Voice Call Details

Date	Time	Phone Number	Call Direction	Rate Type	Minutes Used	Total Charges
45	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
46	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
47	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
48	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
49	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
50	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
51	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
52	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
53	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
54	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
55	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
56	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
57	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
58	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
59	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
60	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
61	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
62	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
63	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
64	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
65	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
66	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
67	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
68	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
69	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
70	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
71	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
72	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
73	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
74	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
75	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
76	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
77	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
78	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
79	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
80	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
81	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
82	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
83	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
84	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
85	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
86	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
87	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
88	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
89	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
90	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
91	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
92	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
93	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
94	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
95	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
96	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
97	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
98	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
99	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	
100	09:26	08:26 PM	800-659-3557	Toll Free Call	7:30	

FIRST DEGREE KIDNAPPING

- In 28 days (between August 1, 2013 and August 28, 2013):
 - Defendant and J [REDACTED] had 42 phone calls with each other
 - 32 of the calls were initiated by Defendant to J [REDACTED]
 - In 28 days, Defendant and J [REDACTED] talked on the phone for 576 minutes

FIRST DEGREE KIDNAPPING

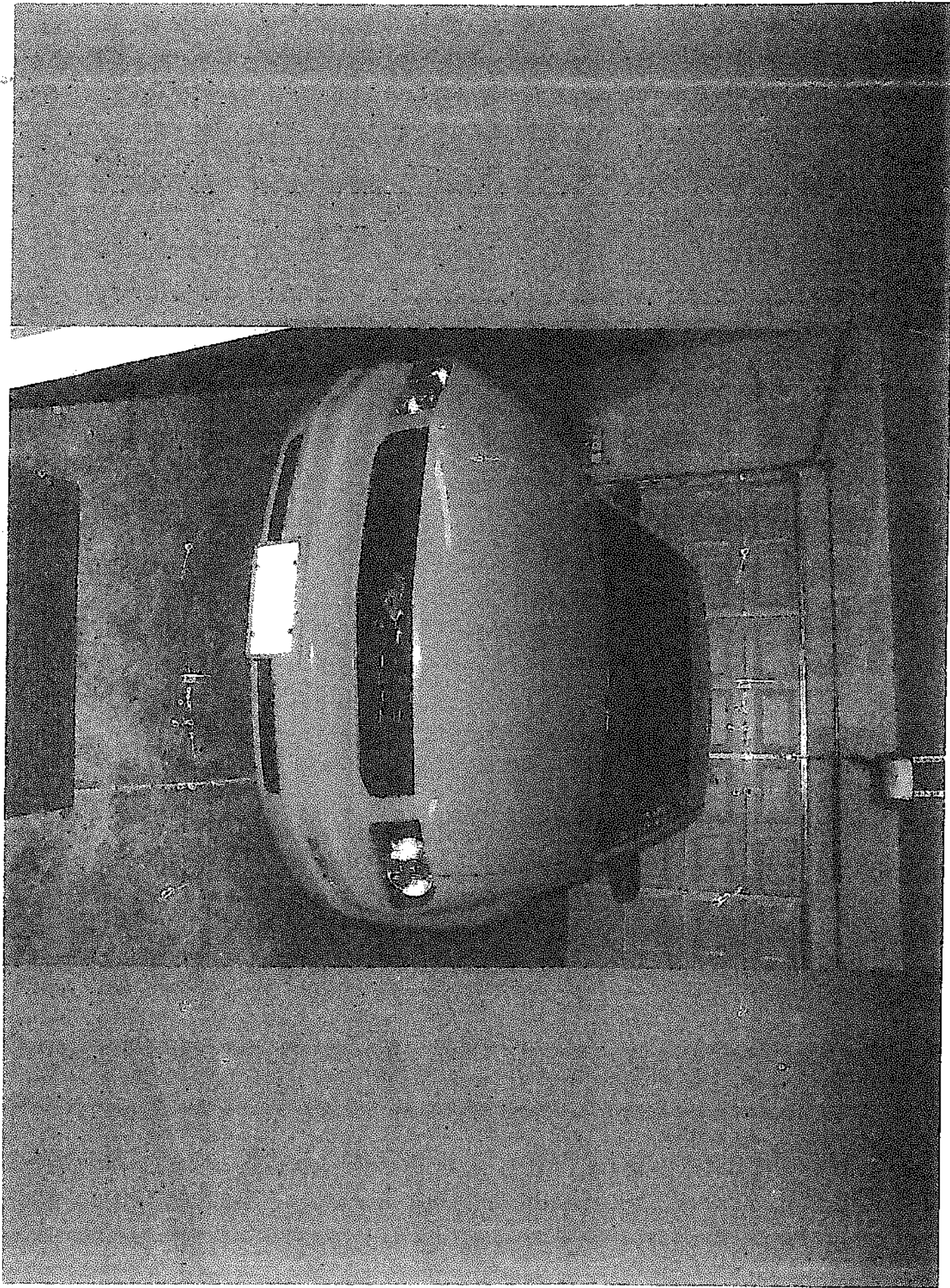
- Defendant provided J [REDACTED] with \$150 which he transferred into her Checking Account on August 22, 2013

[illegible]

Typical of the many problems that afflict our cities and towns is the fact that the police department is the only agency that is not self-sufficient. It must rely on the state for its equipment, training, and other resources. This is a major problem for the state, as it must provide for the needs of all its cities and towns. The state must also provide for the needs of the police department, which is the only agency that is not self-sufficient. This is a major problem for the state, as it must provide for the needs of all its cities and towns. The state must also provide for the needs of the police department, which is the only agency that is not self-sufficient.

FIRST DEGREE KIDNAPPING

- Defendant picked J [REDACTED] up in his late model, red, Mustang the weekend before school started



FIRST DEGREE KIDNAPPING

- He picked her up from a shopping center as she waited by herself
- Although J [REDACTED] was supposed to be staying with her friend from school, Defendant took her to his house to spend the night
- Defendant told you he had his first kiss and sex with J [REDACTED] that night
- She stayed at his house a second night after she told her mother she was going to spend a second night with her friend

FIRST DEGREE KIDNAPING

■ Defendant gave J [REDACTED] a Ring



FIRST DEGREE KIDNAPPING

■ What about this talk of "EMANCIPATION"?

FIRST DEGREE KIDNAPPING

- J [REDACTED] mom and J [REDACTED] were getting along fine until Defendant came into the picture
- Defendant clearly affected J [REDACTED]
- Could Defendant's conduct been reasonably expected to produce this result in which J [REDACTED] thought it was preferable to be with Defendant than her own mother?

FIRST DEGREE KIDNAPPING

- Through his acts did Defendant ENTICE AWAY or LEAD AWAY J [REDACTED] from her family?
- Did Defendant's conduct constitute grooming?

FIRST DEGREE KIDNAPPING

- Defendant Clearly Performed the ACTs of:
 - LEADING AWAY
 - TAKING AWAY
 - ENTICING AWAY
 - CARRYING AWAY
 - DETAINING

FIRST DEGREE KIDNAPPING

- What about Detaining?
- Once taken to Defendant's residence on 8/29/13, J [REDACTED] was physically free to leave much of the time she was there
- Was she mentally free – or did Defendant act in a manner which made it mentally difficult for J [REDACTED] to leave the residence?

FIRST DEGREE KIDNAPPING

- J [REDACTED] told you that she packed her things and was preparing to leave on a number of occasions

- What was Defendant's response?

- He cried

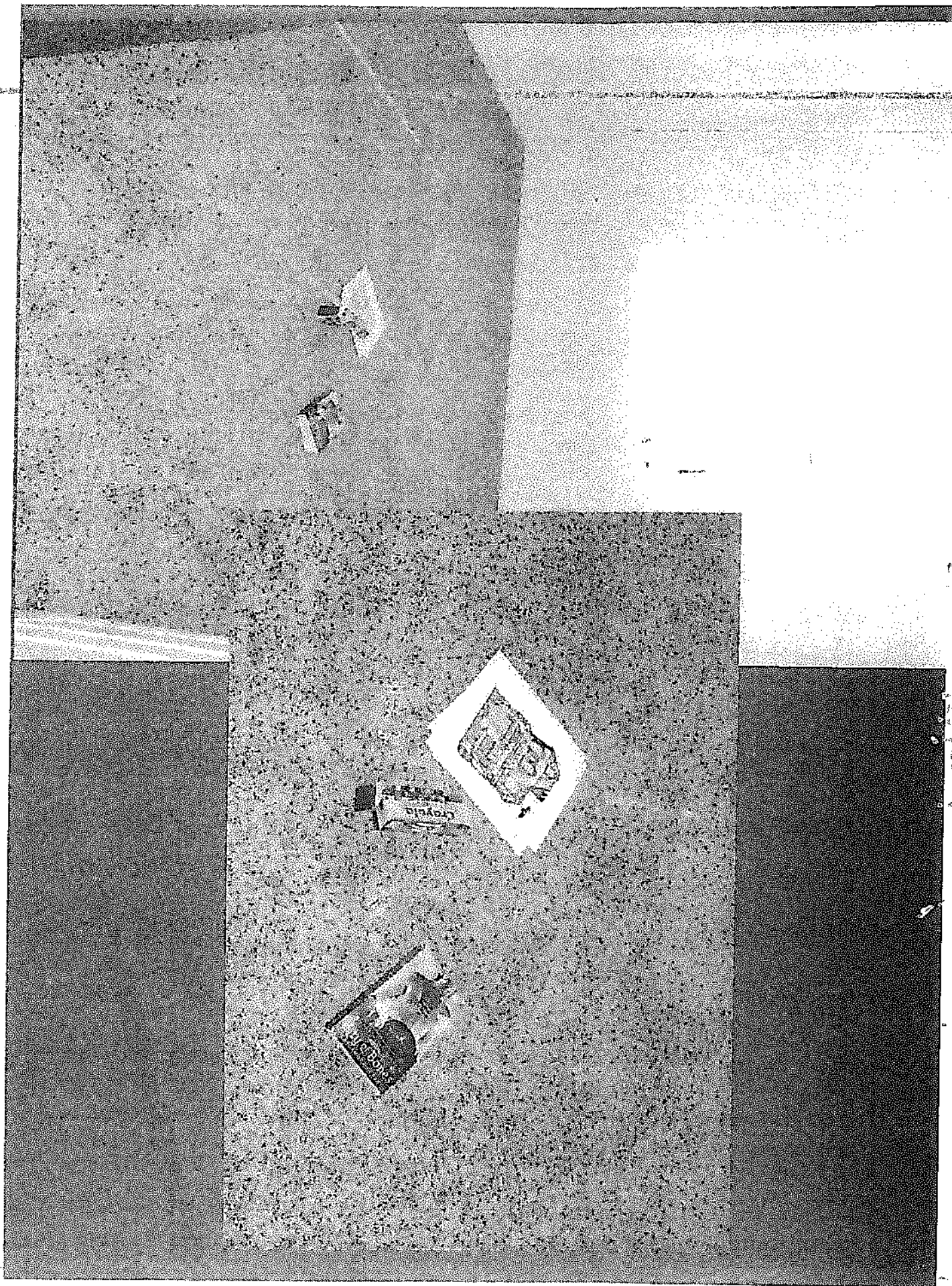
- He reminded J [REDACTED] all that he had done for her

- He told her she didn't love him

- RESULT = SHE STAYED

FIRST DEGREE KIDNAPPING

- When you are thinking about this – Remember – Defendant is 44 and J [REDACTED] is 16.
- Do you think Defendant had life experience, education, job experience which assisted him in persuading J [REDACTED]?
- Compared to Defendant, a trained school teacher, what was J [REDACTED]'s level of maturity?



100-110

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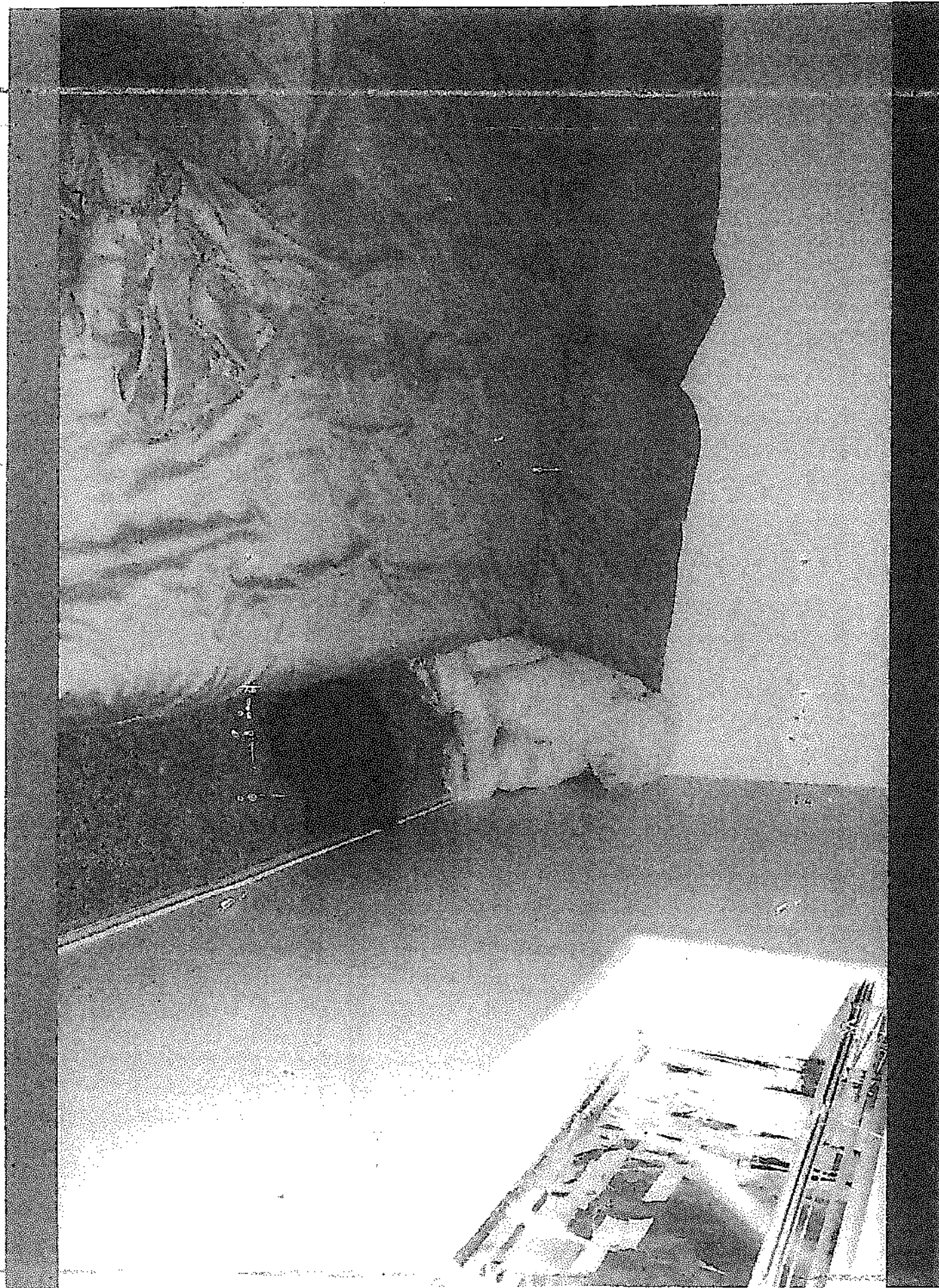
So if you ever find yourself in love and wonder
to what that love truly amounts remember there is
no short to it, wonder what it is? Does your
love ever everything else because they are
worth it.

[illegible]

A black and white photograph of a folded piece of paper, possibly a letter or document, resting on a dark, textured surface. The paper is white and appears to have some faint, illegible markings or text on it. The lighting is dramatic, with strong highlights and shadows.

[Faint, illegible markings]

1 ear
MEL



FIRST DEGREE KIDNAPPING

■ J [REDACTED] had already given up everything she knew to be there with Defendant

■ School

■ Family (Mom, Sisters, Grandmother)

■ Friends

■ Freedom

■ Do you think Defendant's conduct caused J [REDACTED] to question whether she could leave?

FIRST DEGREE KIDNAPPING

■ Remember what J [REDACTED] told her mother in December 2013 after she was out of Defendant's home for about a month and after two stints in Montevista just before she was going to Reno for treatment in a long term facility:

■ "I wish you would have found me sooner. I did not know how to leave."

■ Defendant may not have locked J [REDACTED] in a room but through mental manipulation he clearly detained her in his residence

FIRST DEGREE KIDNAPPING

- Defendant Performed the ACTs of:
 - LEADING AWAY
 - TAKING AWAY
 - ENTICING AWAY
 - CARRYING AWAY
 - DETAINING

FIRST DEGREE KIDNAPPING

■ Every Person who leads, takes, entices or carries away or detains a minor with the intent to:

- (1) Keep, imprison, or confine him or her from his or her parents, guardian, or any other person having lawful custody of the minor; or
- (2) Perpetrate upon the person of the minor any unlawful act
- is guilty of Kidnapping in the First Degree

FIRST DEGREE KIDNAPPING

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FIRST DEGREE KIDNAPPING

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 - (2) Perpetrate upon the person of the minor any unlawful act
- is guilty of Kidnapping in the First Degree

FIRST DEGREE KIDNAPPING

■ Jury Instruction 7

- The intent to “Keep” requires an intent to keep a minor from his or her parents, guardians, or any other person having lawful custody of the minor permanently or for a protracted period of time

FIRST DEGREE KIDNAPPING

- The question becomes, did Defendant perform the ACT of leading, taking, enticing or carrying away or detaining J [REDACTED] with the INTENT TO KEEP J [REDACTED] away from her mother?
- To answer that questions – Remember that Defendant did everything he could to make sure J [REDACTED]'s mom didn't find out anything about what was going on
- Why? - What happens if J [REDACTED]'s mother finds out who Defendant is and what he is doing with her daughter?

FIRST DEGREE KIDNAPPING

- It is clear that Defendant understands this truth about J [REDACTED]'s mom
- We know this from his prior conduct

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Respondent.

Electronically Filed
May 02 2018 04:55 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Docket 73674 Document 2018-16736

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Case No. 73674

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MARKED FOR IDENTIFICATION
DEFT'S PROPOSED EXHIBIT B
CASE # C295158

 Montevista Hospital

November 21, 2013

RE: Patient Name: T , J
 Date of Birth:
 Medical Record #:
 Admission Date: November 16, 2013

To Whom It May Concern:

J is a 16-year-old Hispanic female who currently lives with her mother and grandmother. She was hospitalized once a few weeks ago here at Montevista Hospital. We discharged her and transitioned her to our day hospital, but she decompensated after four days and came back into the hospital. She is here because she tried to kill herself. She tried to jump off a balcony. She was having an argument with her mother in regards to a 19-year-old male boyfriend. She has had a history of promiscuous behavior dating much older men, some of them in their 40s and others in their 30s. She has a history of sexually transmitted disease and we have treated her with doxycycline for chlamydia. She is extremely impulsive. She has mood swings. She is depressed. We have started her on medication and she is currently on Risperdal for mood stabilization.

We feel that J is not emotionally stable to testify in court at this point in time. We have recommended for her to go to a long-term residential treatment facility where her medication can be better adjusted and also where she can engage in long-term individual therapy.

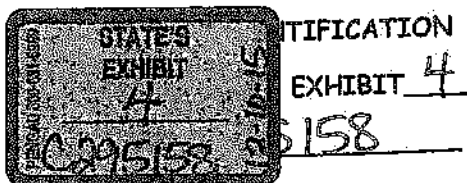
Please do not hesitate to contact me if more information is needed.

Sincerely,



Emmanuel Nwapa, M.D.

EN/cg25
#1121-010



MARKED FOR IDENTIFICATION
STATE'S PROPOSED EXHIBIT 10
CASE # C295158

12:00 6:01 PM

← FROM JAYSENIA_MALIK REPLY



jaysenia_malik

It's so weird! Your name is the name I wanted to name my daughter and my birthday !!! Haha weird right??



audrey_

Is it or do we know someone in common? ;)



jaysenia_malik

@audrey 6697 Mel?



audrey_

:)



jaysenia_malik

@audrey_ seriously who is this it isn't funny



jaysenia_malik

@jaysenia_malik it's not a cute joke



audrey

It's me



jaysenia_malik

Me who



audrey_
It's me Mel

30m



audrey_
I'm living in Oklahoma



audrey_
But I'll get in trouble if they find out I'm
talking to you



audrey_
Please don't say anything to anyone



audrey_
Hello



jaysenia_malik
Hey



jaysenia_malik
Why would you risk that



jaysenia_malik
You lied to me!!!! You touched kids and
you lied



audrey_



FROM

JAYSENIA_MALIK

REPLY



Jaysonia Malik

That's not possible



Audrey

01/19/1998



Jaysonia Malik

He's in jail



Jaysonia Malik

And takes the



Audrey 6697

No



Audrey 6697

They led to you.



Jaysonia Malik

Explain yourself



Jaysonia Malik

No.



Audrey 6697

He's in jail

FROM
JAYSENIA_MALIK

REPLY



jaysenia malik

Is that it??? Are you just going to say
that and leave?



jaysenia malik

What now??? Why Oklahoma ? You
lied about Cali you gave me an std!!!



jaysenia malik

Hello???



audrey

I'm here



audrey

I didn't give you an std



audrey

And I didn't lie



audrey

You don't understand the limitations on
my freedom and ability



jaysenia malik

Well explain and ok stfu ! I gave myself
an std please!

FROM
JAYSENIA_MALIK

REPLY



jaysenia_malik

I'm not 16 anymore I'm not a freaking idiot everything you make think of me is wrong I don't sleep around and I damn straight didn't have an std before I met you



jaysenia_malik

How do you even have Internet freedom?



audrey

Ok I'll go away please don't hate me



jaysenia_malik

No



jaysenia_malik

What do we do now!?



audrey

Keep calm



jaysenia_malik

How do I know it's even Melvyn and not his dick attorney





audrey

I will always love you



jaysenia malik

Well are you going to stop talking to me?



audrey

Is it you?



jaysenia malik

Of course it's me! You contacted me!



audrey

Please don't say anything to anyone



audrey

And I'm glad you are ok



audrey

Are you working?



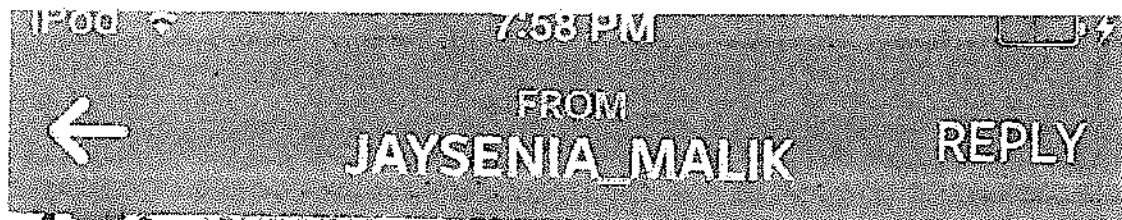
jaysenia malik

Yes I work



jaysenia malik

Send me a video. Then I'll love you.



jaysenia_malik

Yes I work



jaysenia_malik

Send me a video .. Then I'll know it's you



audrey

Do you hate me?



jaysenia_malik

Why do you keep asking that?



jaysenia_malik

What are your limitations



audrey

Have you looked me up on the Internet?



jaysenia_malik

Yes only things about me come up



audrey

Honestly I didn't give you an std I was checked and I didn't have anything plus I don't sleep around either so I don't know what happened



FROM
JAYSENIA_MALIK

REPLY



audrey_

Honestly I didn't give you an std I was checked and I didn't have anything plus I don't sleep around either so I don't know what happened



jaysenia_malik

Can you send me a video or something? Do you work??



audrey_

I'm scared



audrey_

Are you going to tell your mom? I don't mean any harm just want you to be happy



jaysenia_malik

You're scared I'm scared!



jaysenia_malik

Why Oklahoma ?? Do you have a job??
... You are going to jail huh ?



jaysenia_malik

How do I know it's Melvyn ?



FROM

JAYSENIA_MALIK

REPLY



audrey_

How do I know this is jay and not her
mother?



jaysenia_malik

I sent a video



audrey_

Where are you?



jaysenia_malik

Bedroom watching judge Judy



jaysenia_malik

Your turn



audrey_

You are really beautiful



jaysenia_malik

You are stalling



audrey_

No



jaysenia_malik

Do I look older?



lisa_thomas04

Do you have a phone?



jaysenia_malik

I'm sorry you should had never contacted me. You know I suck with secrets I can't not show I'm different in someway you should had just never contacted me Mel!



lisa_thomas04

Why



lisa_thomas04

Did you tell your mom



lisa_thomas04

Please don't say that



jaysenia_malik

I didn't tell anyone



jaysenia_malik

But you can't ask me to keep this secret I'll



lisa_thomas04



FROM
JAYSENIA_MALIK

REPLY



I'll have to kill myself to keep it



lisa thomas04

No



lisa thomas04

I'll go back to jail



jaysenia_malik

It's ok no one will no



lisa thomas04

Please if you can't I'll have to stop
talking



jaysenia_malik

I'll just be with God sooner then
thought



lisa thomas04

?



jaysenia_malik

My life



jaysenia_malik

This world sucks anyway haha



FROM
JAYSENIA_MALIK

REPLY



jaysenia_malik

This world sucks anyway haha



lisa_thomas04

Please be calm and mature I need you



lisa_thomas04

Do you take meds?



lisa_thomas04

Are you ok?



jaysenia_malik

Goodbye Mel



lisa_thomas04

Are we breaking up



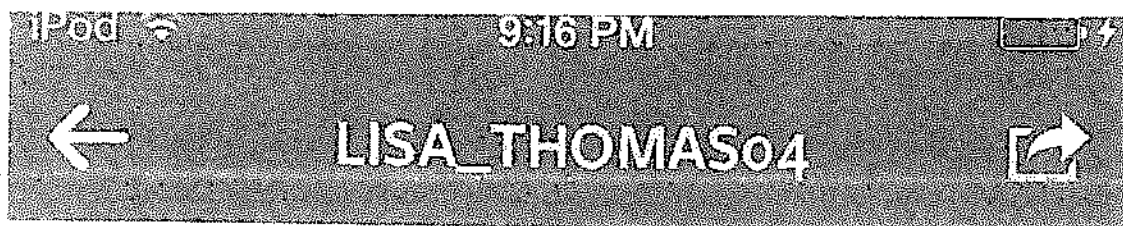
jaysenia_malik

Pray to God he will show you what you did wrong because he knows you have sinned



lisa_thomas04

Ok I will thank you and God bless



0
0
1
+ 1 more...





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Followers

Following

Posts

Profile

Settings

+ Follow

View Profile



NOWAYDUDE555



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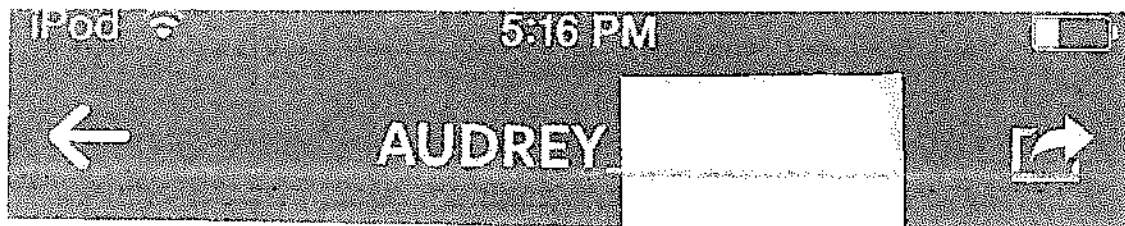
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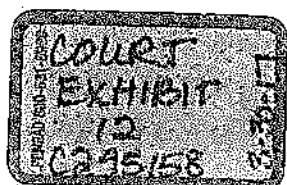
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STATE OF NEVADA

VS

MELVYN PERRY
SPROWSON, JR.

What Crimes is Defendant Charged with Committing?

CRIMES WITH WHICH DEFENDANT IS CHARGED

- First Degree Kidnapping (Count 1)
- Child Abuse, Neglect, or Endangerment with Substantial Mental Harm (Count 2)
- Unlawful Use of a Minor in the Production of Pornography (Counts 3, 4, 5, and 6)

FIRST DEGREE KIDNAPPING

■ Jury Instruction 7

■ Every Person who leads, takes, entices or carries away or detains a minor with the intent to:

■ (1) Keep, imprison, or confine him or her from his or her parents, guardian, or any other person having lawful custody of the minor; or

■ (2) Perpetrate upon the person of the minor any unlawful act

■ is guilty of Kidnapping in the First Degree

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- is guilty of Kidnapping in the First Degree

FIRST DEGREE KIDNAPPING

- Jury Instruction 8

- A "minor" is a person less than 18 years of age.

- J [REDACTED] is clearly a minor

FIRST DEGREE KIDNAPPING

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