

Lazaro Bravo-Torres

- The best he could ever do is 90%
- "cut and styled his hair"
- No way robber was 15 inches taller if he is described as "little bit taller"
- His wife told him the man they caught had her things

Santiago Garcia

suggestiveness at its best

Santiago Garcia

- Much ado about an I-phone, but NOT about a phone
- Clearly going to tell State what they want to hear
- What really happened at his original show-up?

Juan Campos- Torres

Not here - did he get it wrong?

Rosa Vasquez

"Not him - this man is
much much taller"

Rosa Vasquez

- Show-up was 95%. But said it looked like he had cut his hair and styled it
- Stood within 10ft of Mr. Valentine here in court and said it WAS NOT HIM
- Backed off because police told her the items were found in Mr. Valentine's apartment and no one else could have had them

What is the common thread?

No, the victims don't know each other.

POLICE

Chanise Williams

- Omara, Bobby, Keandre and another woman arrived at her house on 5/27...
- The girls went out, the boys stayed in
- On Saturday morning she woke up to cops
- Didn't want to be in Court
- Did nothing wrong (jury instruction)

Jail Calls

CLARK COUNTY DETENTION CENTER PHONE CALLS

PAGE 2

EVENT #: 160528-1147

Valentine: I said I should went in Mad Dog's house...

? Female: That's was ... or when I wanted you to know they were coming and you and what you would have call it supposed to be gone.

? Female: Yall supposed to leave before they even came upstairs.

Valentine: Man, I didn't think. When I've seen them outside I didn't know what they were outside for.

? Female: Right

Jail Calls

Knows where pieces of the gun are...

Jail Calls

Explains charges

Jail Calls

- "bobby's been left, 2 days ago"

Jail Calls

Who owns the car?

Does it matter?

Access matters...

Omara McBride

- Knows Bobby and Keandre
- Her car
- She pawned the gold chains
- Wouldn't it have been great to hear what she had to say?

Dr. Smith – Eyewitness Identification Expert

- PhD in Psychology
- Authored over 100 books/articles/chapters
- Professor for 37 years
- Attends conferences every year and is familiar with the latest studies and theories
- Specifically studied the science of eyewitness identification and memory

Is the Study of Eyewitness Identification science?

- Yes
- Subject to scientific method – continually challenged, tested and reassessed
- Always “needs more research” – medical doctors feel the same!

Eyewitness Identification

- 70-80% accurate in the best "control" conditions
- Under perfect circumstances, false identifications occur 10-15% of the time
- Other non-suggestive factors ease or mitigate suggestiveness back to these levels

Eyewitness Identification

- 3 areas of concern:
 - 1) Systemic
 - 2) Suggestibility
 - 3) Similarities

Systemic – applies to every eyewitness

- Stress / Anxiety & Weapon Focus
- Degree of Confidence \neq Accuracy

Stress / Anxiety and Weapon Focus

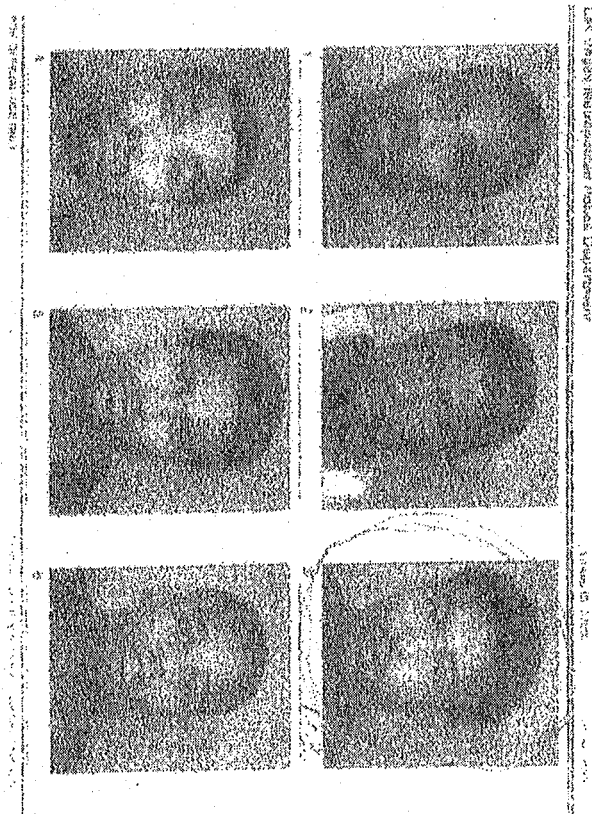
- Heightened anxiety/stress is good, highest anxiety/stress is bad
- Weapon involvement: every witness had a gun pointed at them

Attention/memory is like money, each person only has so much money to spend...

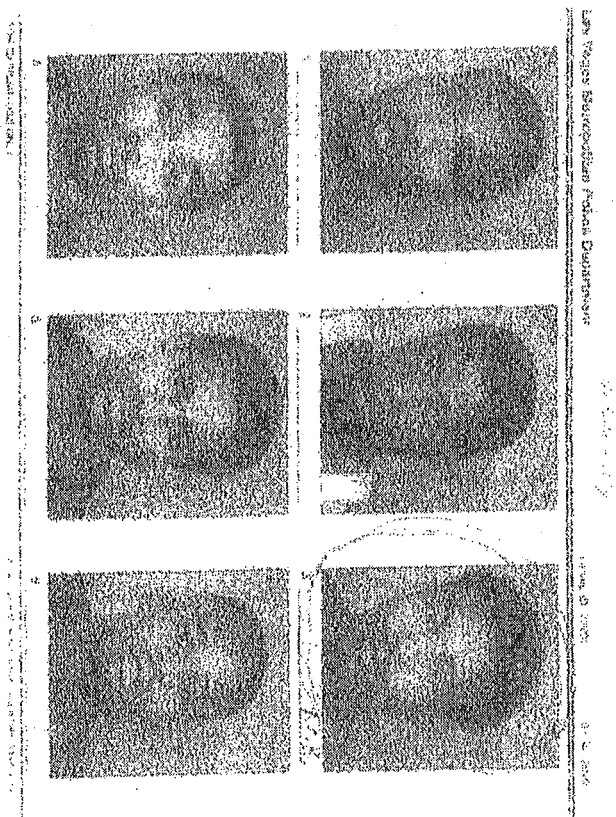
Suggestibility

- Photo Spread (Line-up)
- Show-up

Line-up



Line-up



- Can't tell height
- "not a hair line-up"
- Didn't turn on the recorder – why?

Line-up

- Can't tell height
- "not a hairline-up"
- Didn't turn on the recorder – why?

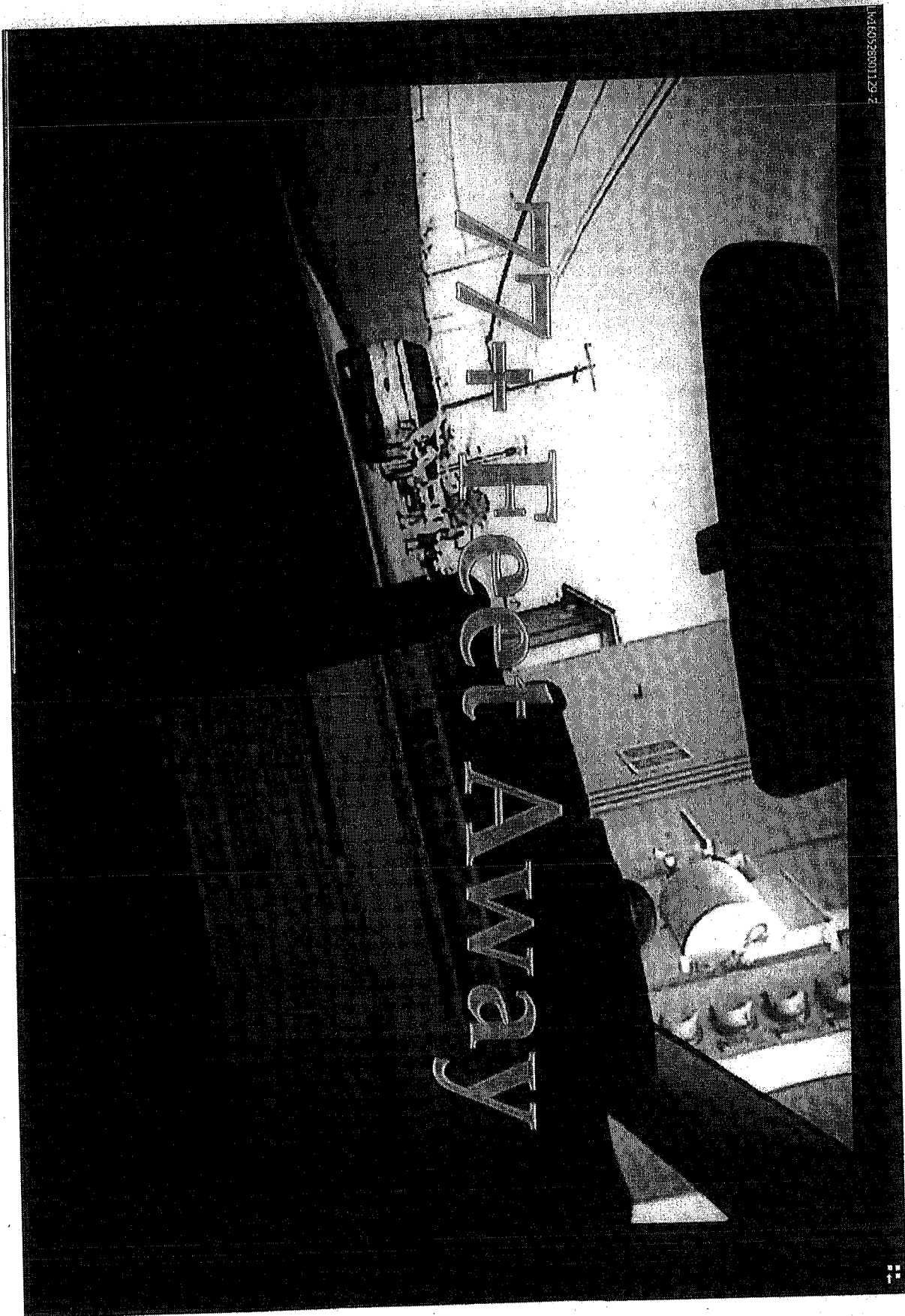
Line-up

- What we **DO NOT** know:
 - Did Mr. Bass actually read and understand the instructions
 - Did Detective Majors say anything suggestive to Mr. Bass
 - Verbal
 - Non-verbal
 - WHY WAS IT NOT RECORDED?

Why is hair such a big deal?

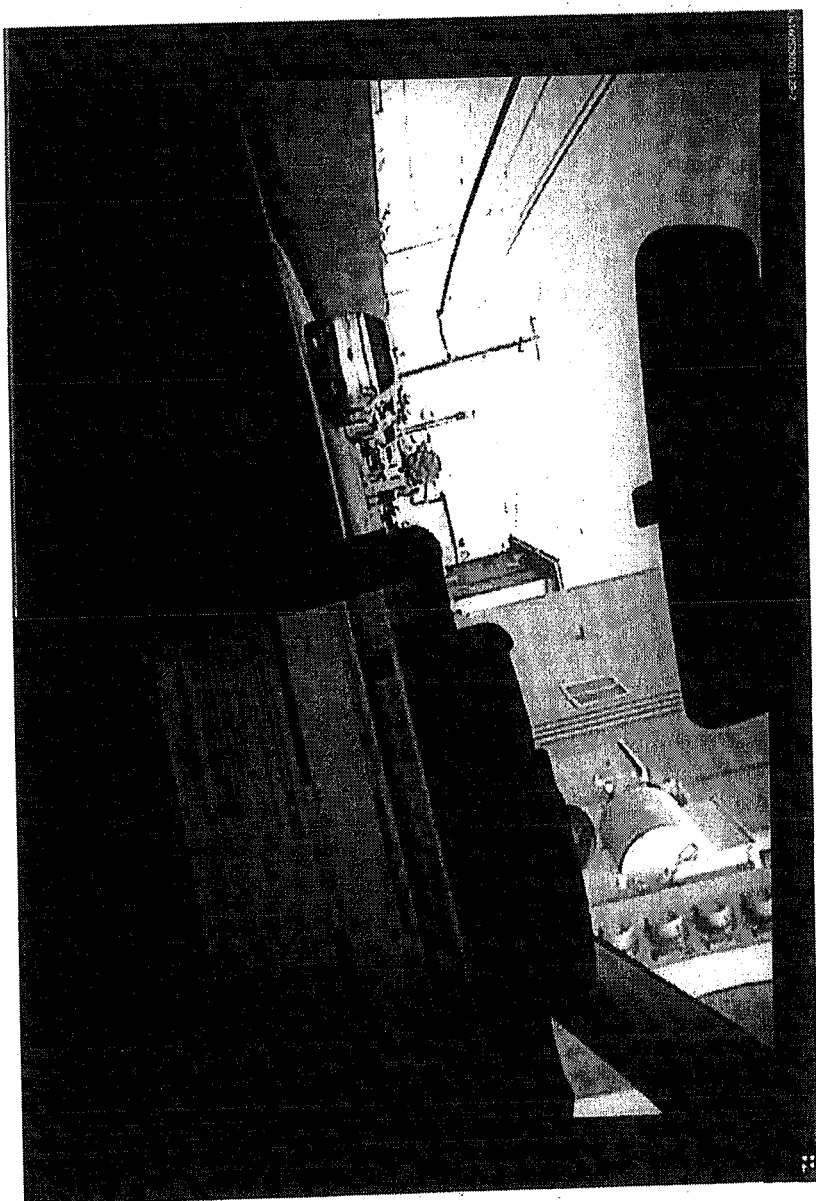
Show-up

- Suggestive situation
- Witnesses could move closer?
 - Only two witnesses working with Ludwig could do this, and they had the most doubt even with that opportunity
- Only one show-up on body-camera
- One show-up specifically NOT recorded after quasi-ID of car



What can you see?

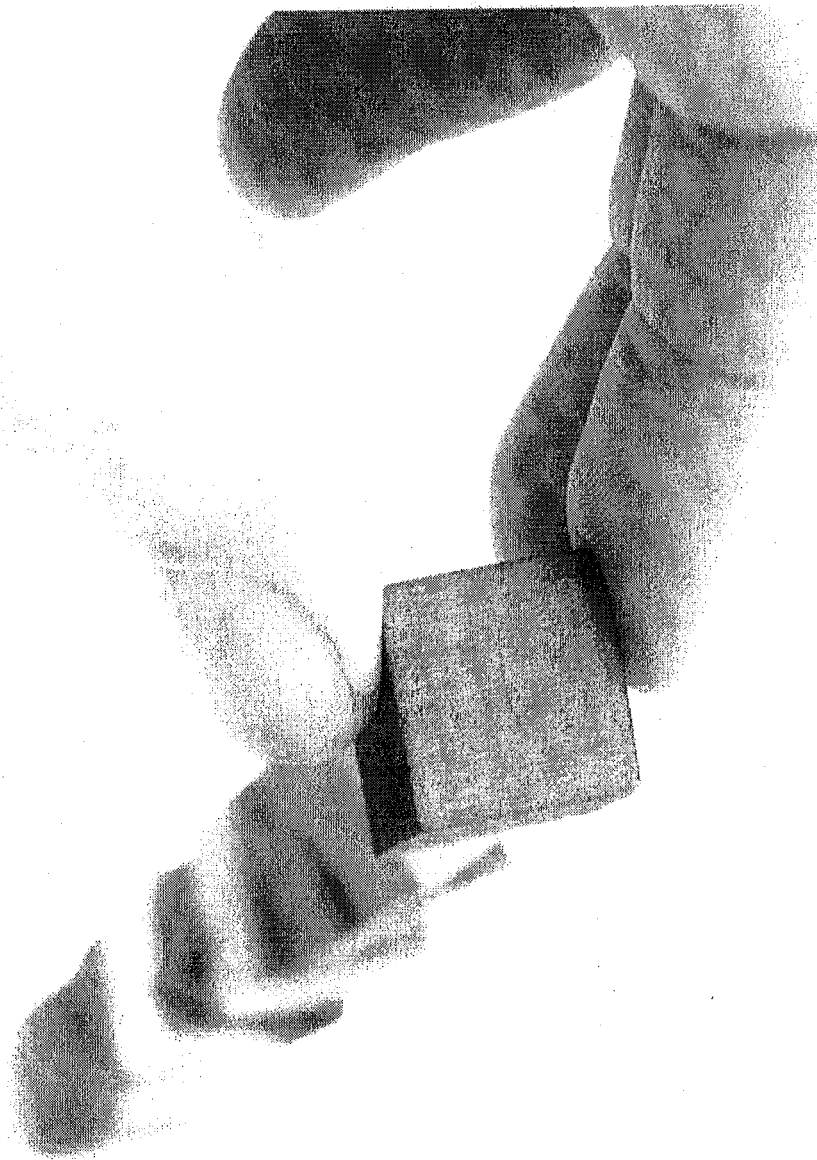
- Relative difference
- Body/build
- Hair



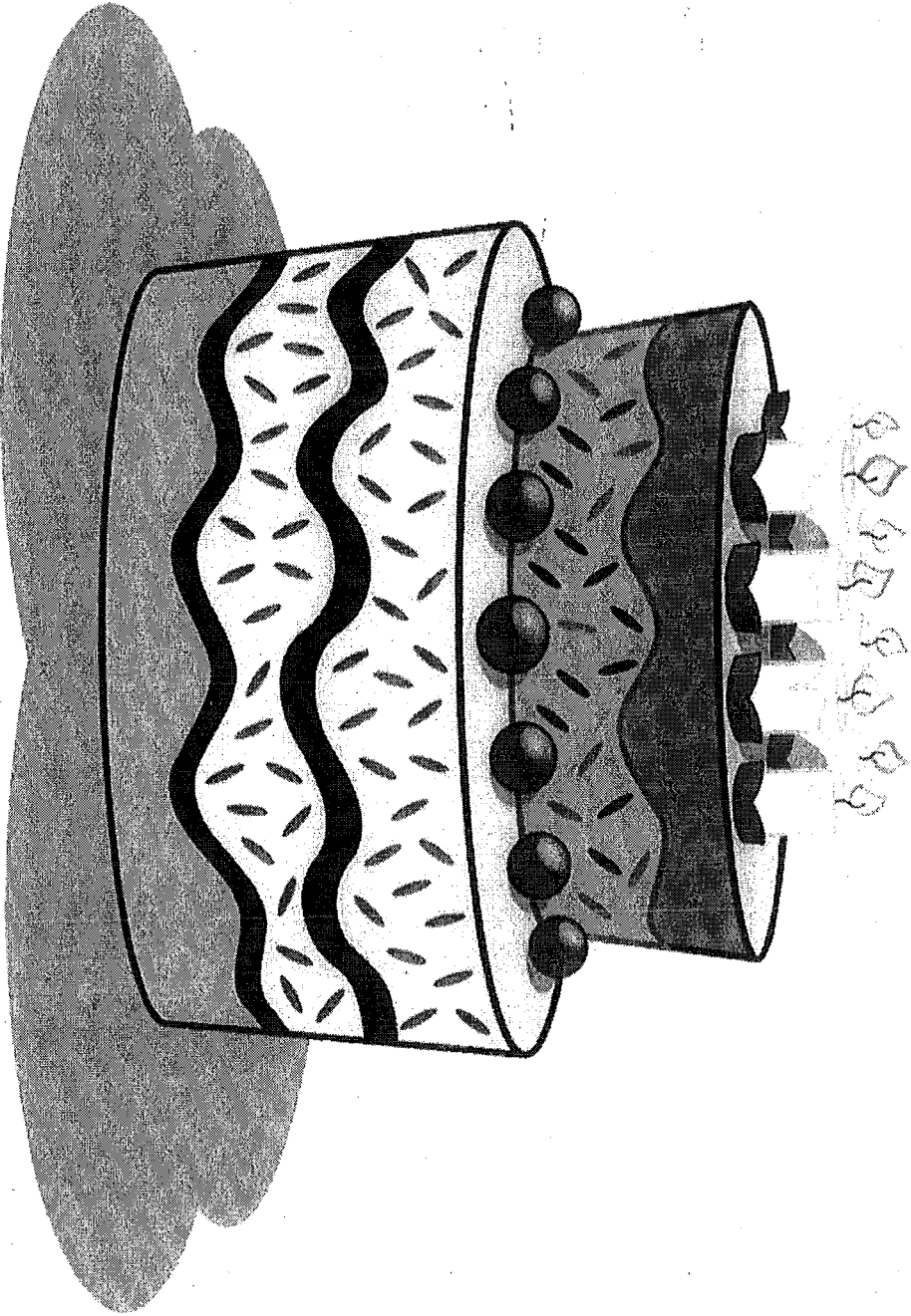
Where are the rest of the show-up videos?

- Faulkner
- Vasquez
- Bravo-Torres
- Juan?
- Santiago

Building Blocks



Cake



Similarity

- Between the robber and the suspect

Bobby and Keandre

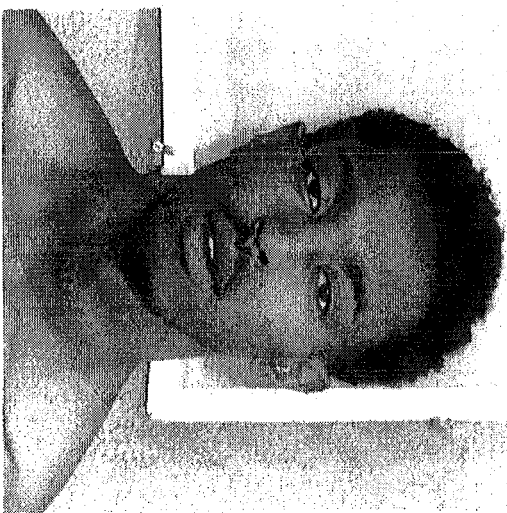


Bobby McCoy

5'10"

145 lbs

Photo: December 2016



Keandre Valentine

6'3"

160 lbs

Photo: May 2016

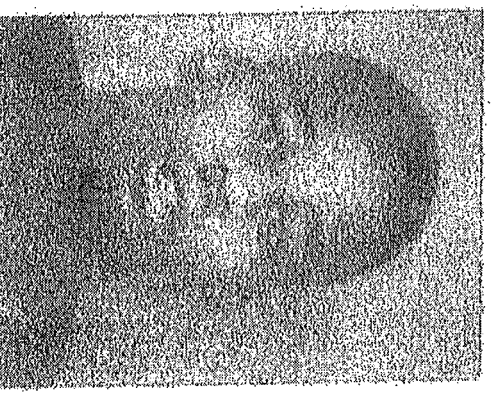
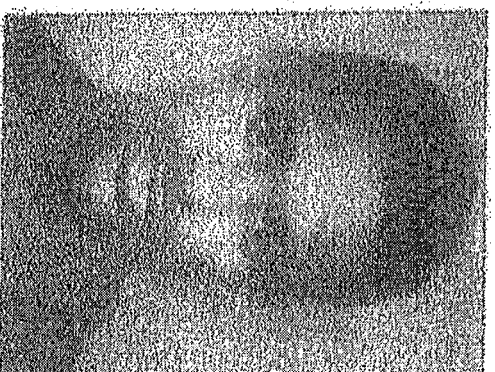
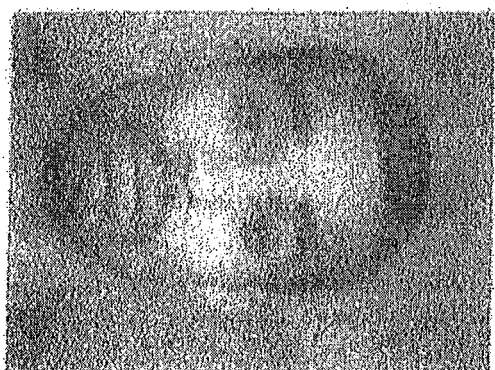
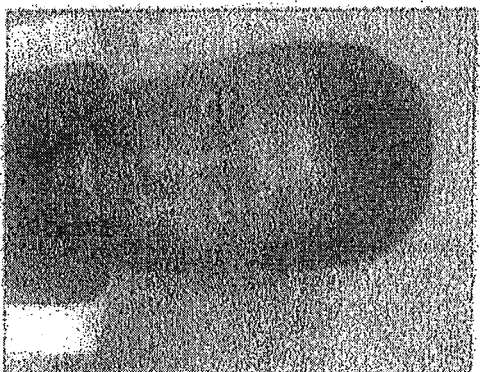
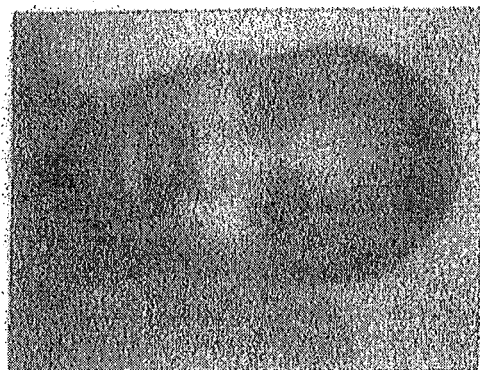
Don't let the State say it was both a good line-up and Bobby doesn't look similar to Keandre...

Las Vegas Metropolitan Police Department

160206-0179

License ID: 1466

01 Jan 2014



FOR OFFICIAL USE ONLY

Copyright © 2014 by the City of Las Vegas, Nevada. All rights reserved.

No evidence that Keandre did this over Bobby.

We know Keandre did not snitch on Bobby.

This isn't a balancing of who "more likely" did it.

Jury Instructions

State's Rebuttal

Reasonable Doubt

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

KEANDRE VALENTINE,) No. 74468
)
 Appellant,)
)
 vi.)
)
 THE STATE OF NEVADA,)
)
 Respondent.)
 _____)

PHILIP J. KOHN Clark County Public Defender 309 South Third Street Las Vegas, Nevada 89155-2610	STEVE WOLFSON Clark County District Attorney 200 Lewis Avenue, 3 rd Floor Las Vegas, Nevada 89155
Attorney for Appellant	ADAM LAXALT Attorney General 100 North Carson Street Carson City, Nevada 89701-4711 (702) 687-3538

CERTIFICATE OF SERVICE

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 2 day of August, 2018. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

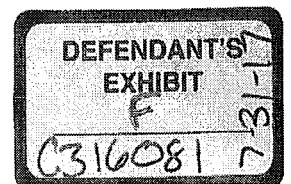
ADAM LAXALT
STEVEN S. OWENS

SHARON G. DICKINSON
HOWARD S. BROOKS

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

KEANDRE VALENTINE, #1187170
ELY STATE PRISON
P.O. BOX 1989
ELY, NV 89301

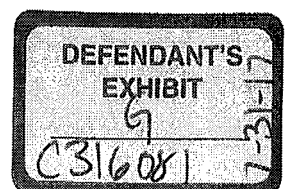
BY /s/ Carrie M. Connolly
Employee, Clark County Public Defender's Office



MCCOY, BOBBY EUGENE



3150

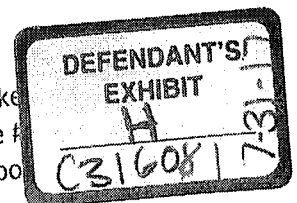


Name = MCCOY, BOBBY EUGENE



g. pg. 9

Marked
Case #
Propo





02 A Analysis

Marked	DEFENDANT'S	7-31-11
Case #	EXHIBIT	
Propo	I	
	C31608)	

LAS VEGAS METROPOLITAN POLICE DEPARTMENT LATENT PRINT CARD

EVENT # 160528-1147 CSA: J Smith B177 DATE: 5/28/16

VICTIM: Lazaro Bravo-Torres (12/17/58) LOCATION: 1701 1 St. #3-218

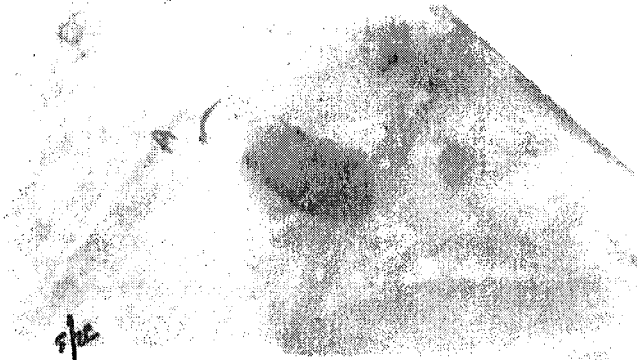
PRINT LOCATION: Exterior right front door below handle (2)

ADD. INFO: 2016 Mazda J, Ca Temp Reg 32691555, VIN/M1BML777G1344926

o/s

RM

Q2
o/s



Q2A - Whorl pattern; twisting distortion visible
Identified to #3 the right middle finger of Bobby MCCOY.

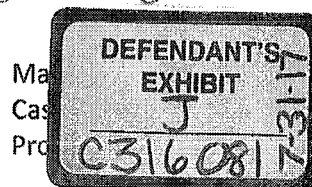
Results previously reported by FS Gouldthorpe P# 8648 on 7/18/2016.

Verifications

Grand Jury Case # 16AGJ046X

Page 7

Jun 28 2016



Ma
Cas
Pro

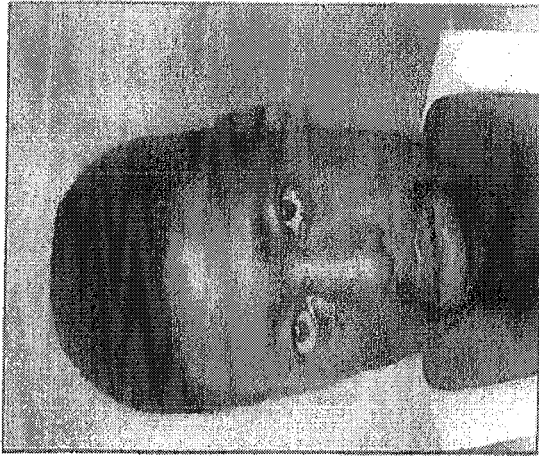
Las Vegas Metropolitan Police Department

Lineup ID: 37906

01 Jun 2016



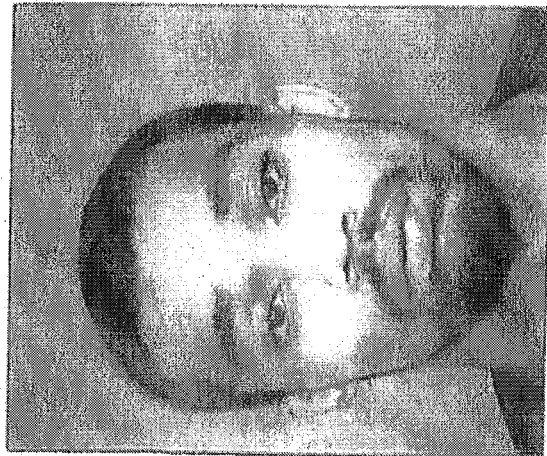
1



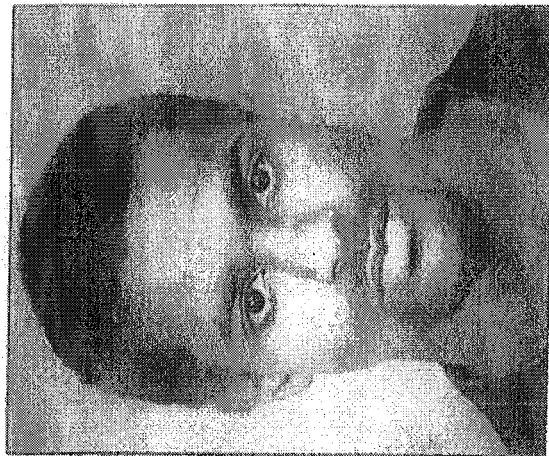
2



3



4



5



6

FOR OFFICIAL USE ONLY

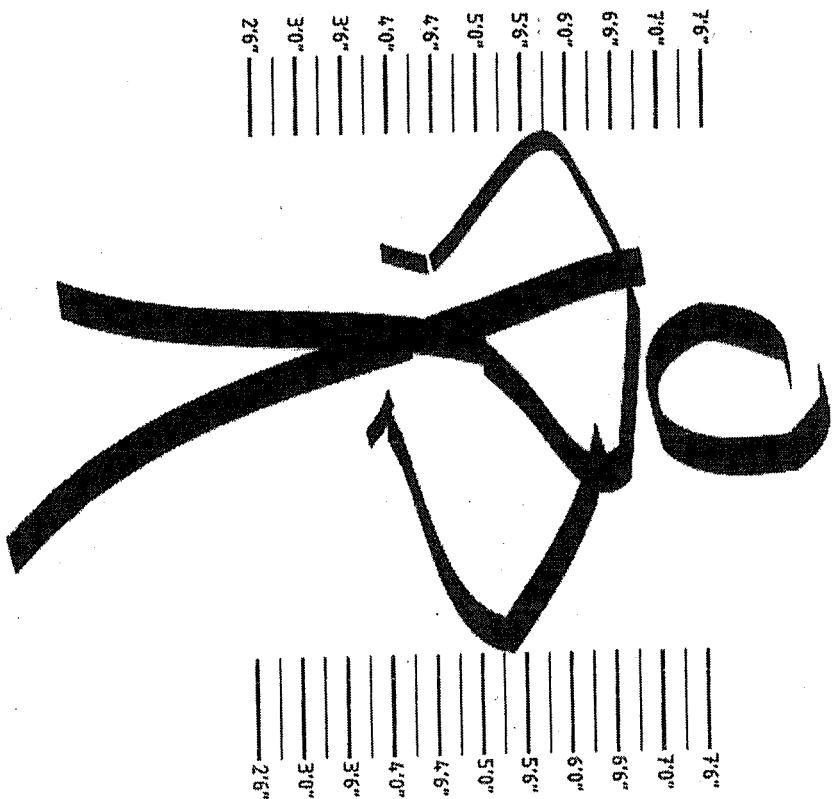
Copyright © 2004-2016, All Rights Reserved, Las Vegas, NV

Defense Closing

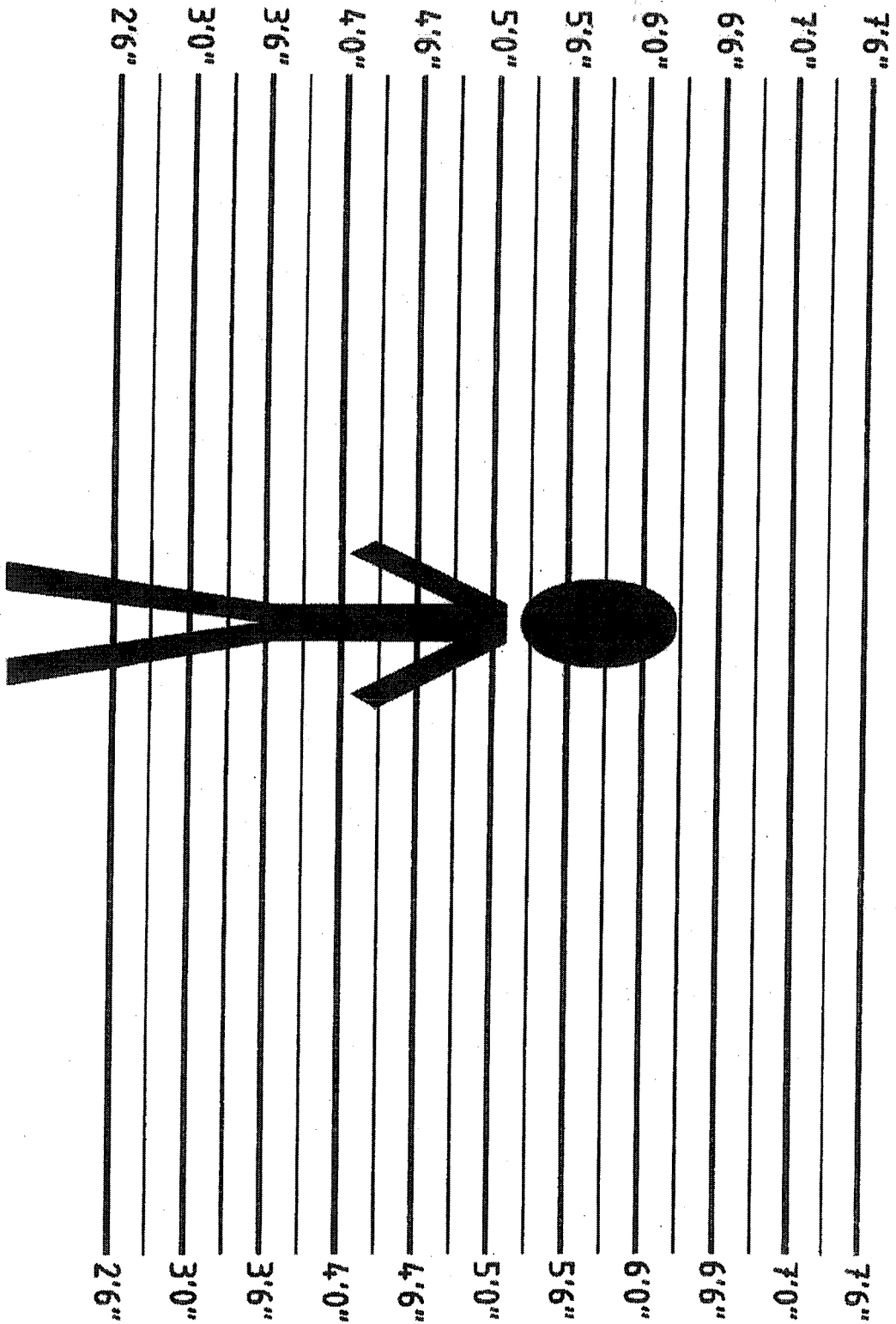
State of Nevada v. Keandre Valentine



Why does height matter?

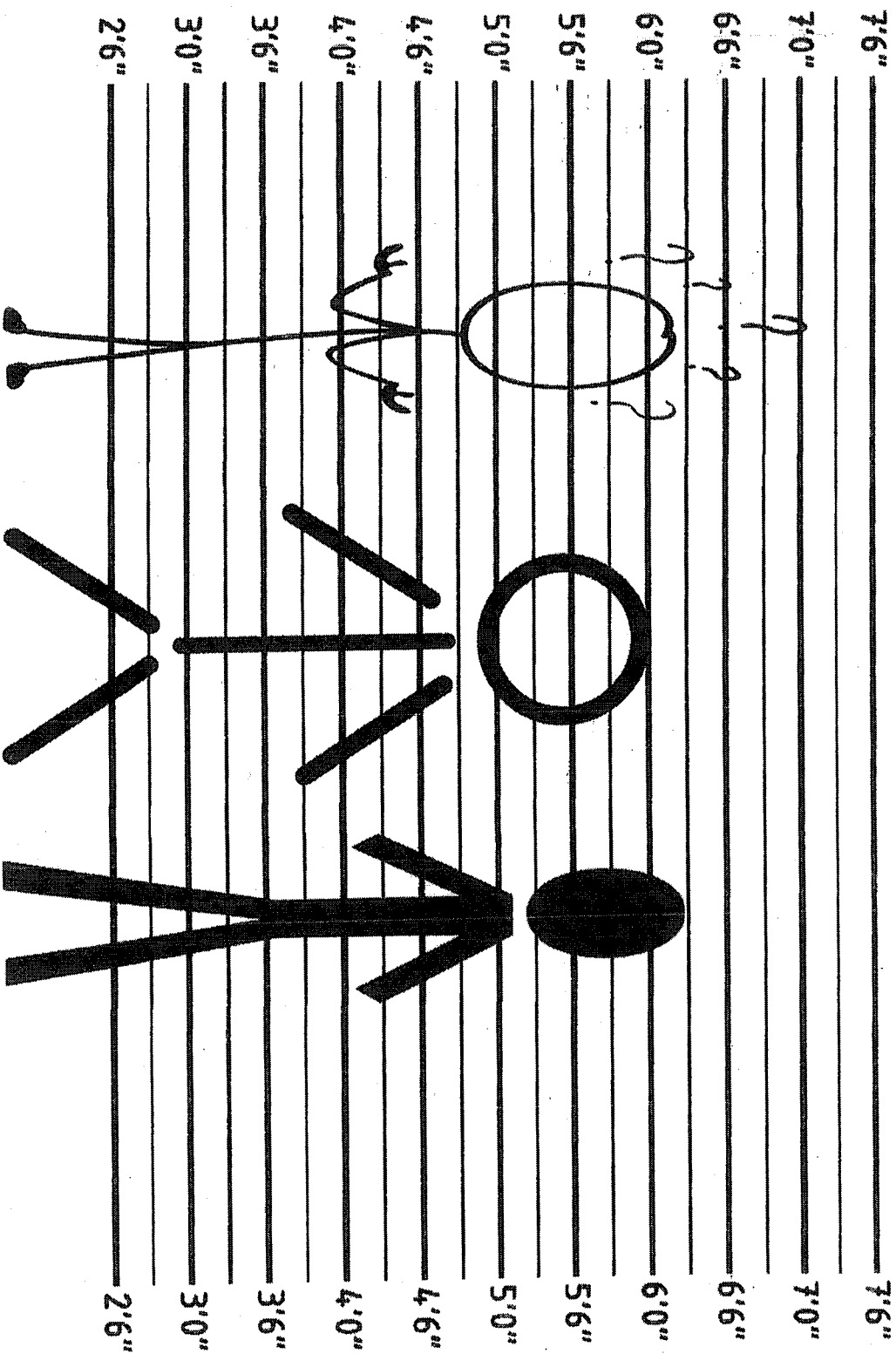


Keandre Valentine - 6'3"



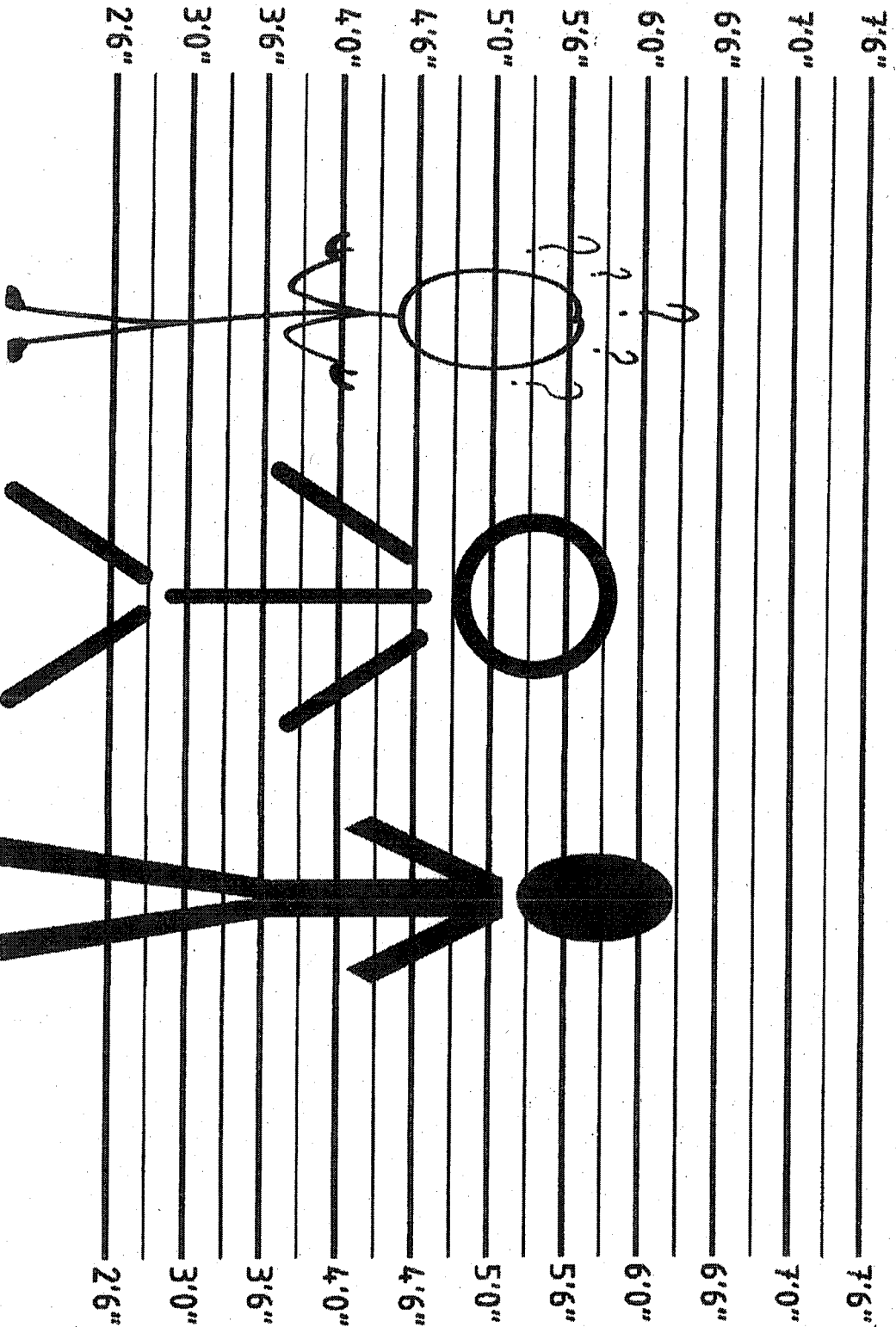
Marvin Bass (6'2") – the robber is

shorter than I am (5'10" – 6'1")



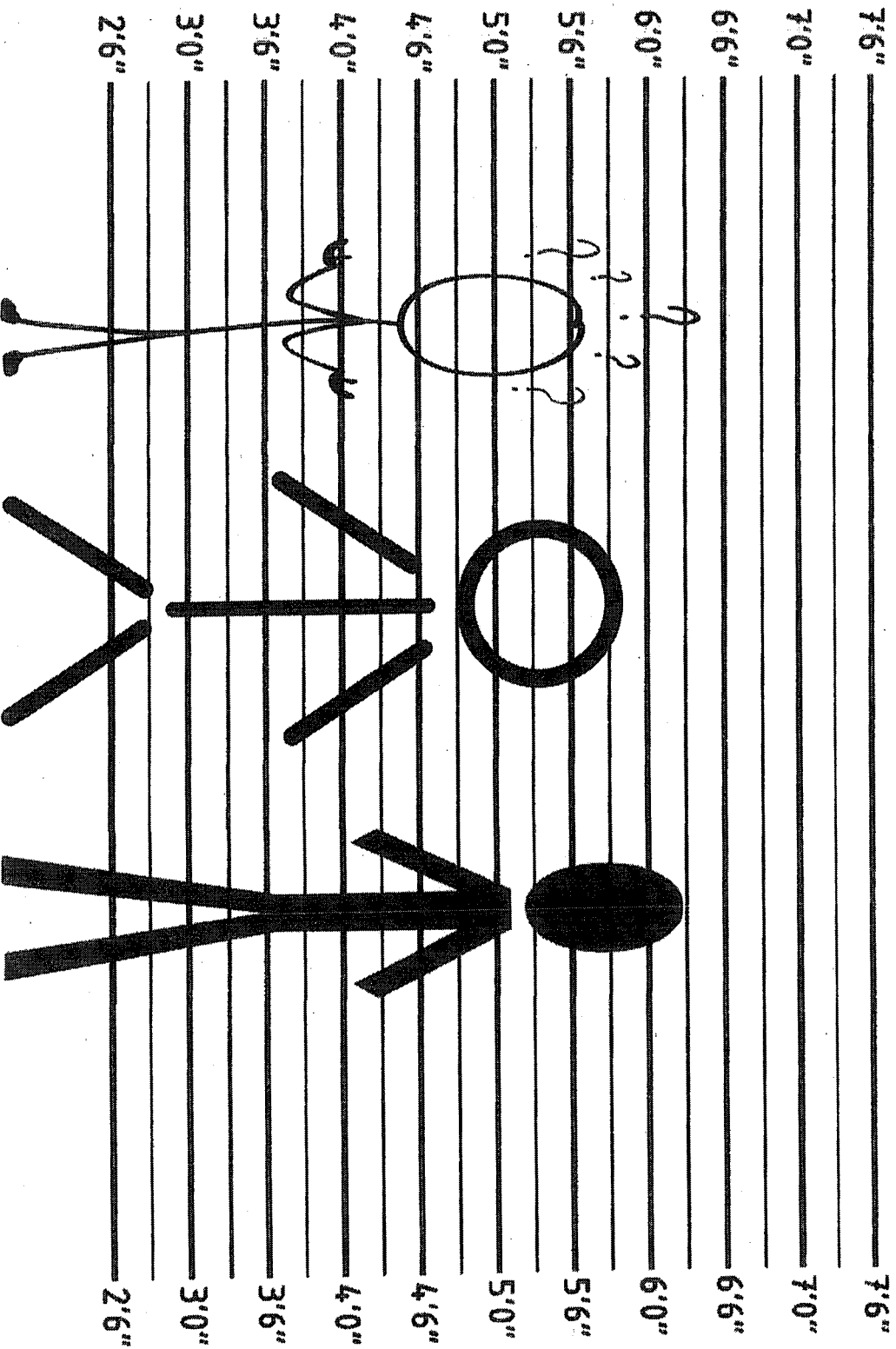
Jordan Alexander (5'7") – the robber is

"a little bit taller" than I am (5'8"-5'10")

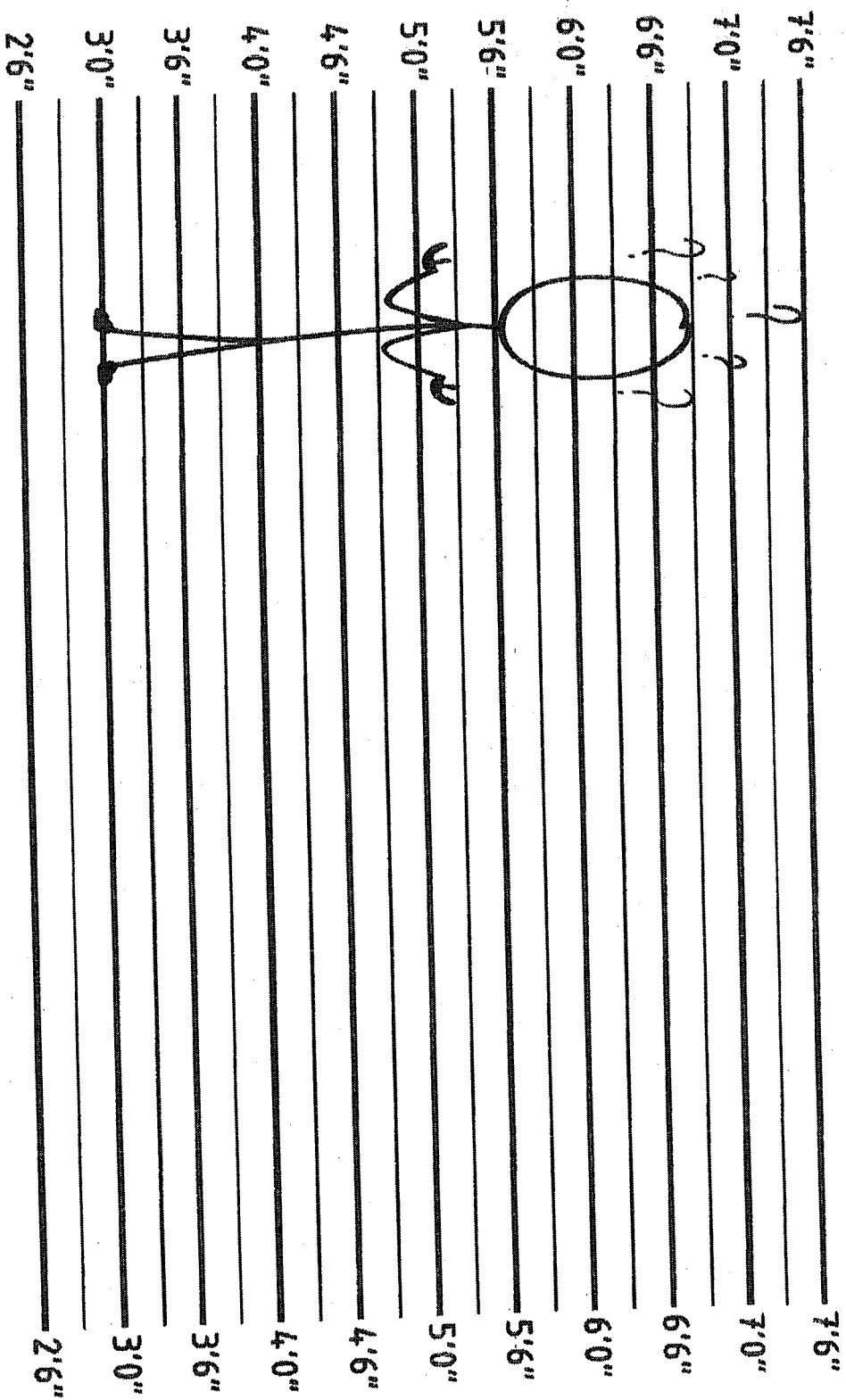


Santiago Garcia (5'7") – the robber is

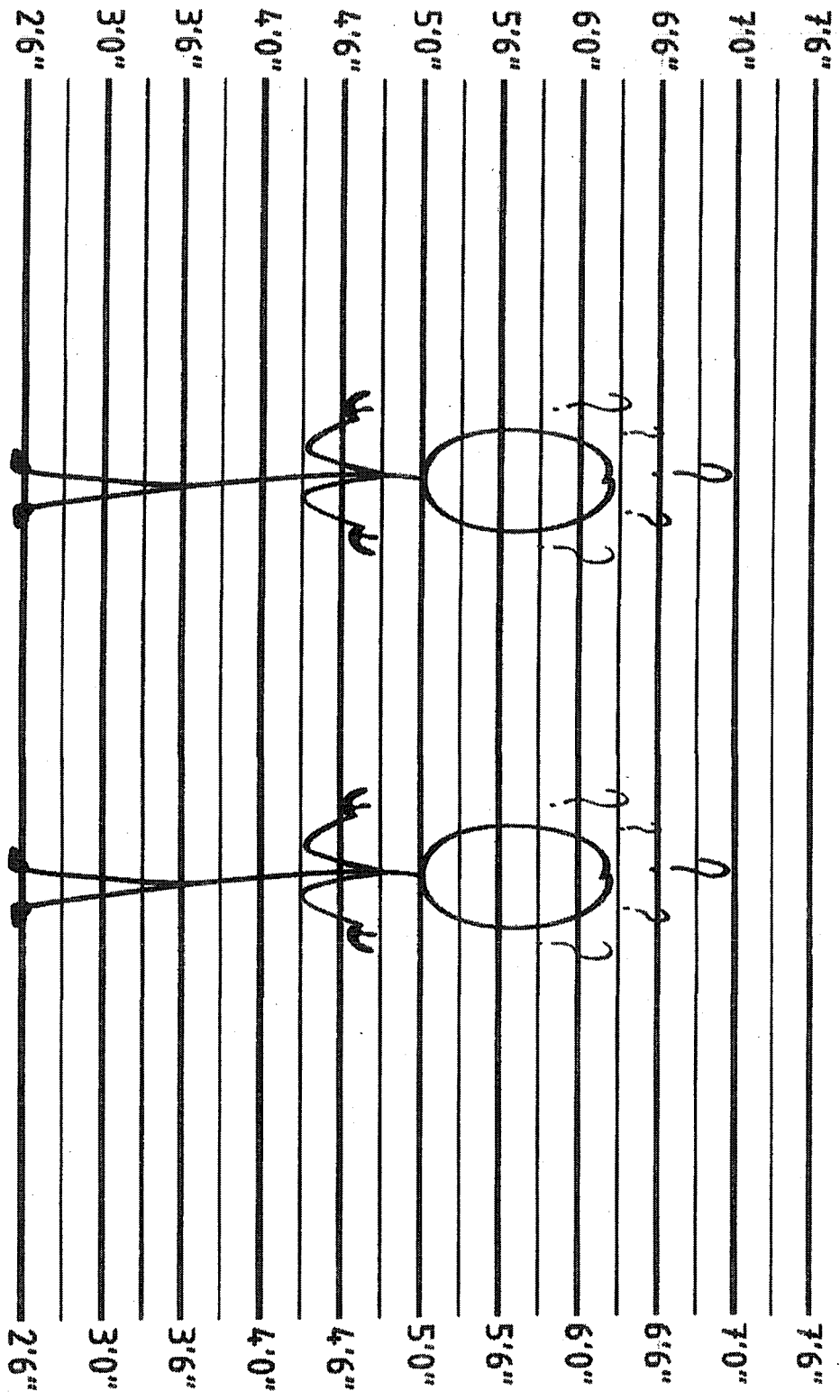
5'10"



Juan Campos-Torres ???

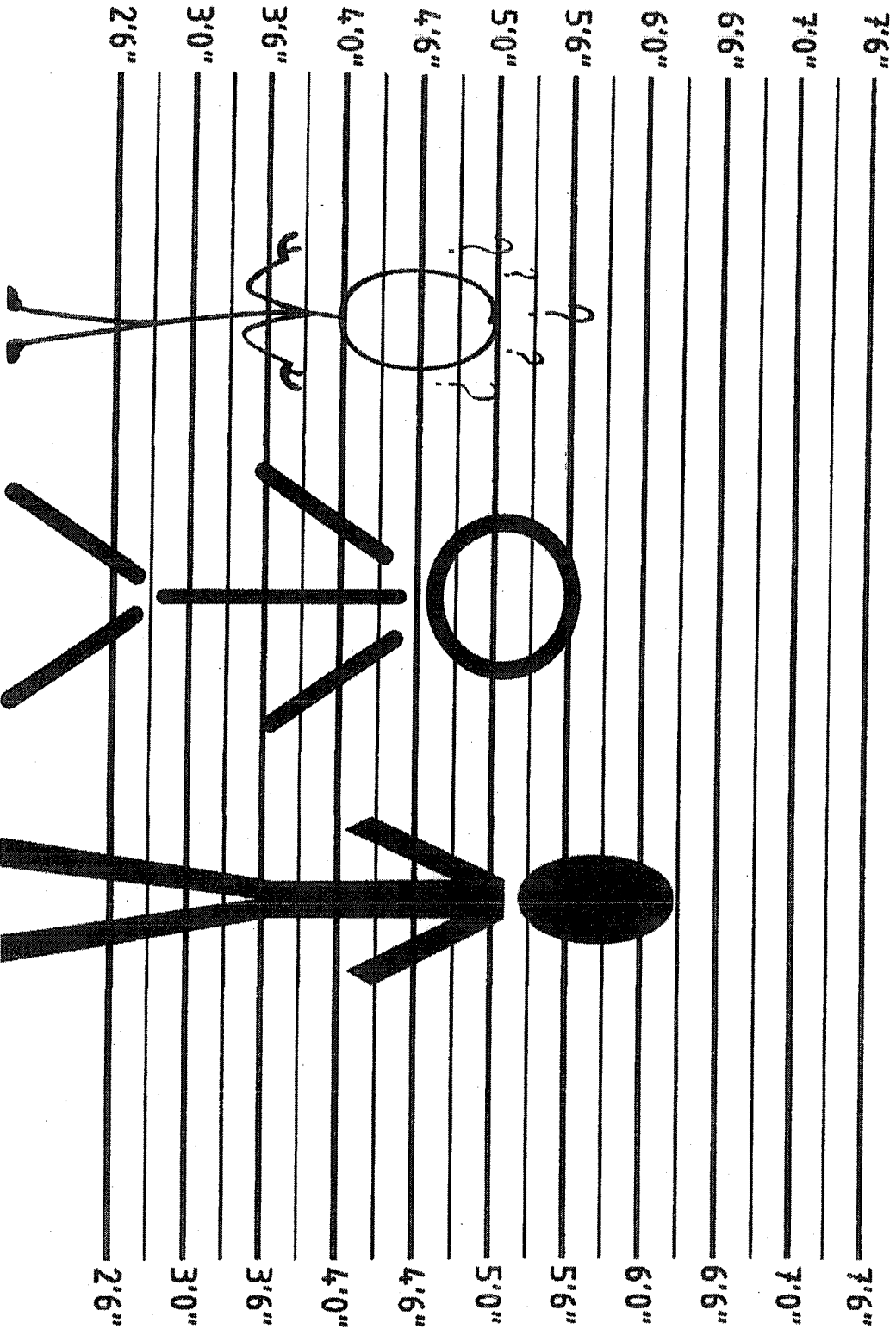


The Faulkners - Don't mention height



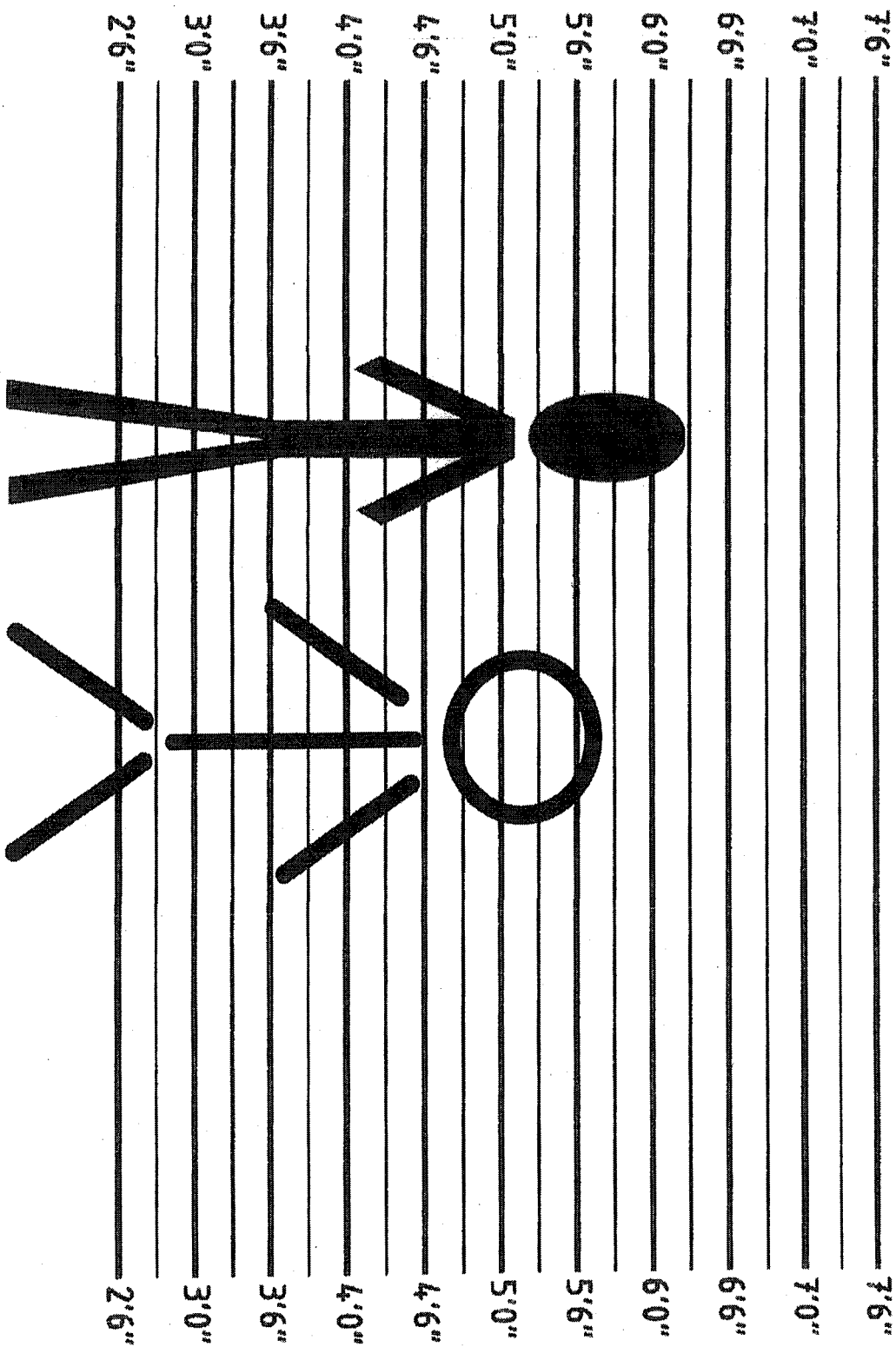
Lazero Bravo-Torres (5') – the robber is

"a little taller" than I am (?)

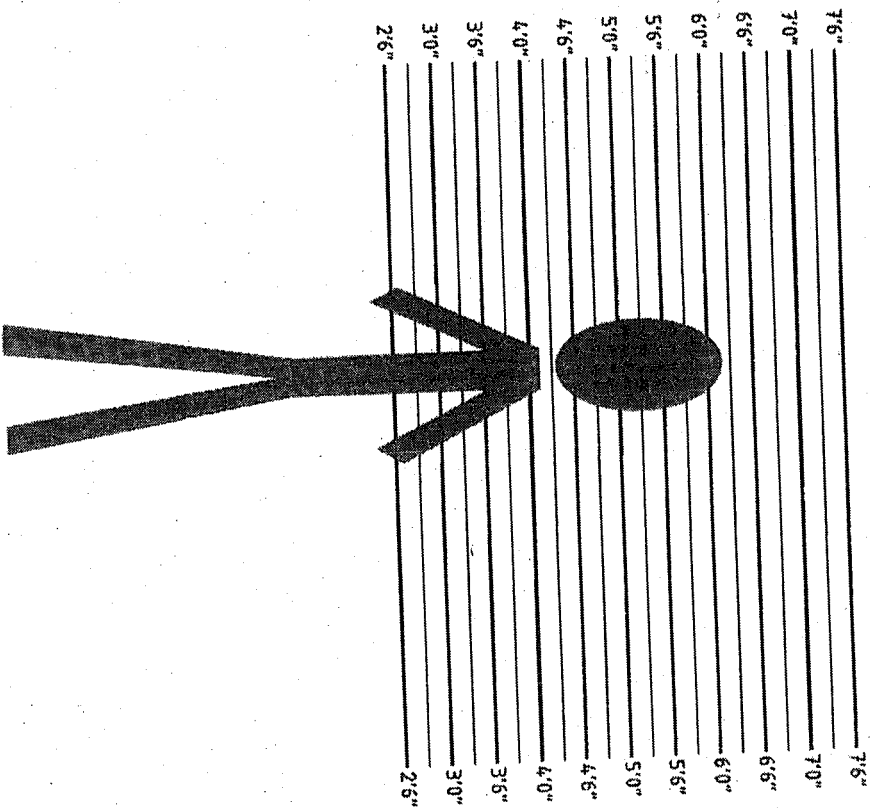


Rosa Vasquez – "This man is much much taller

than the man who robbed me"

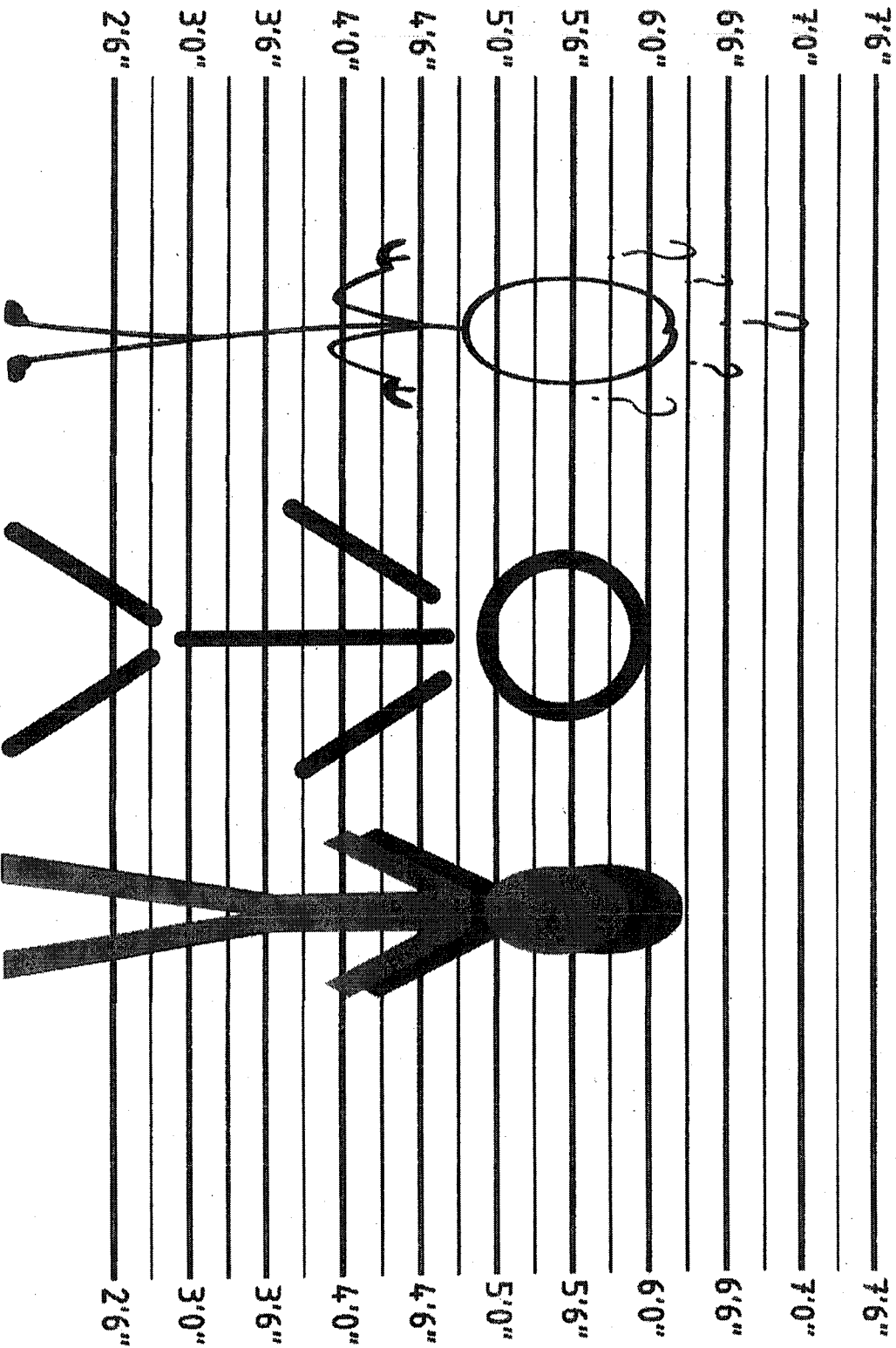


Bobby McCoy - 5'10"

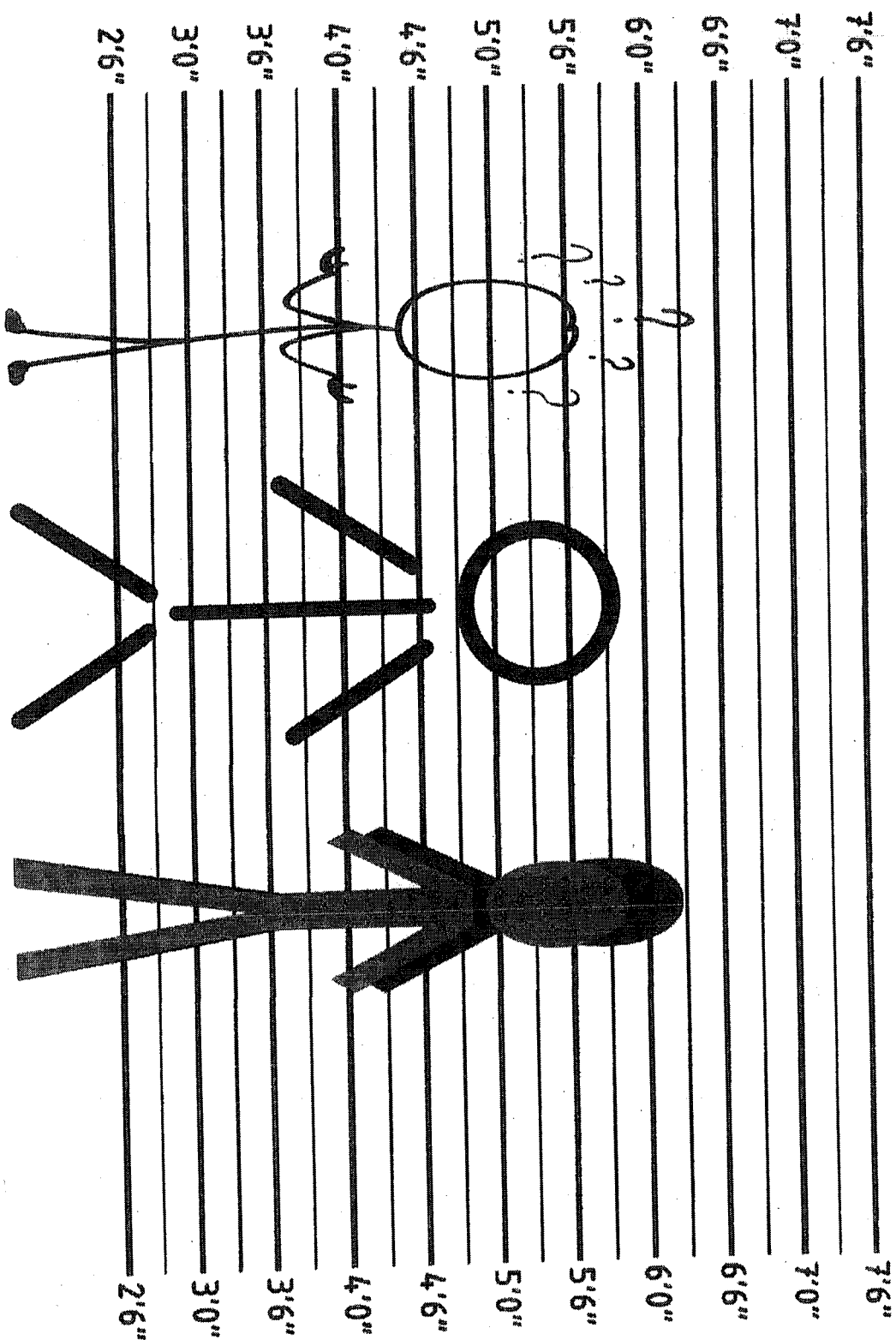


Marvin Bass (6'2") – the robber is shorter than

I am (5'10" - 6'1")

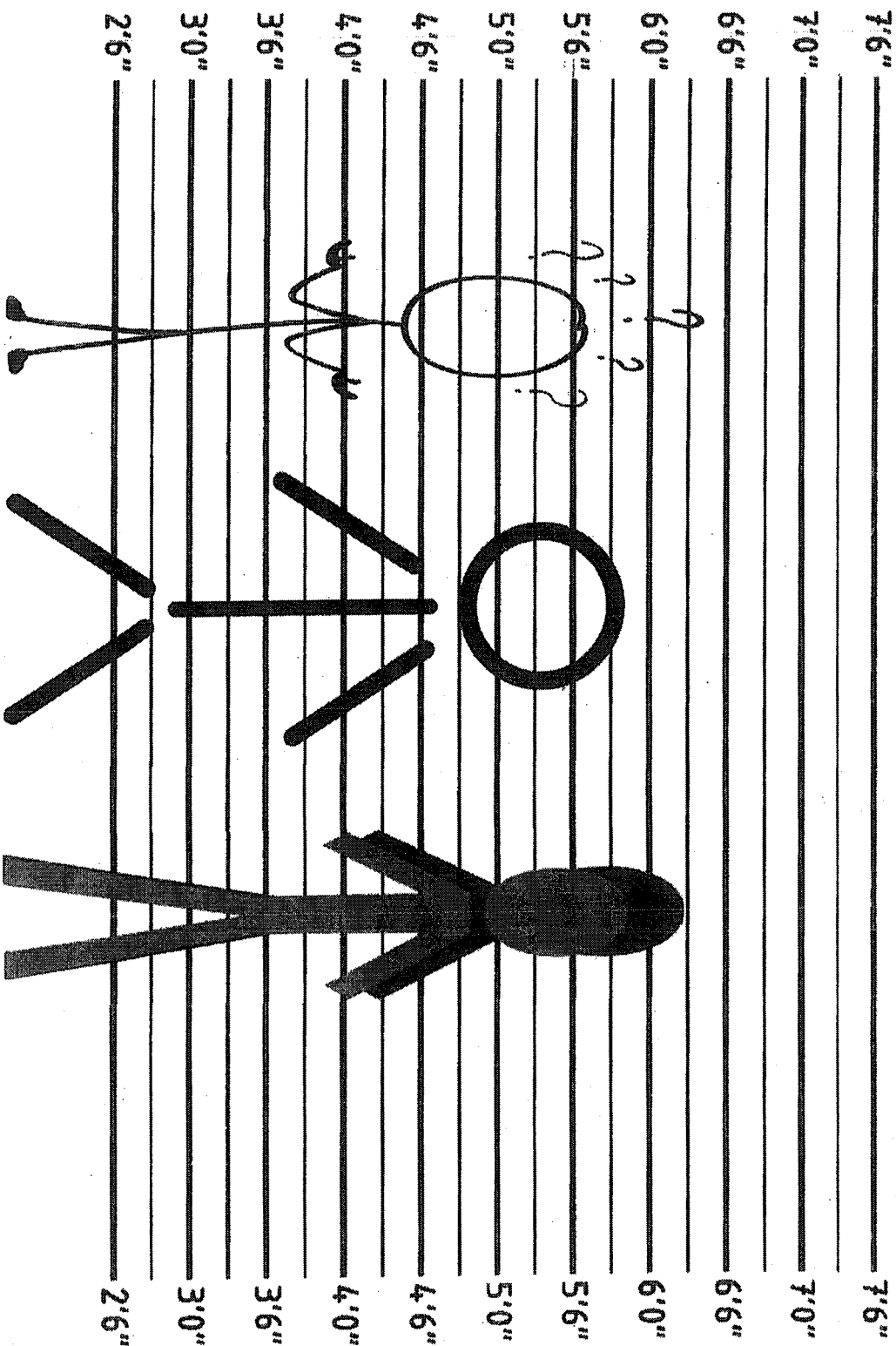


3171



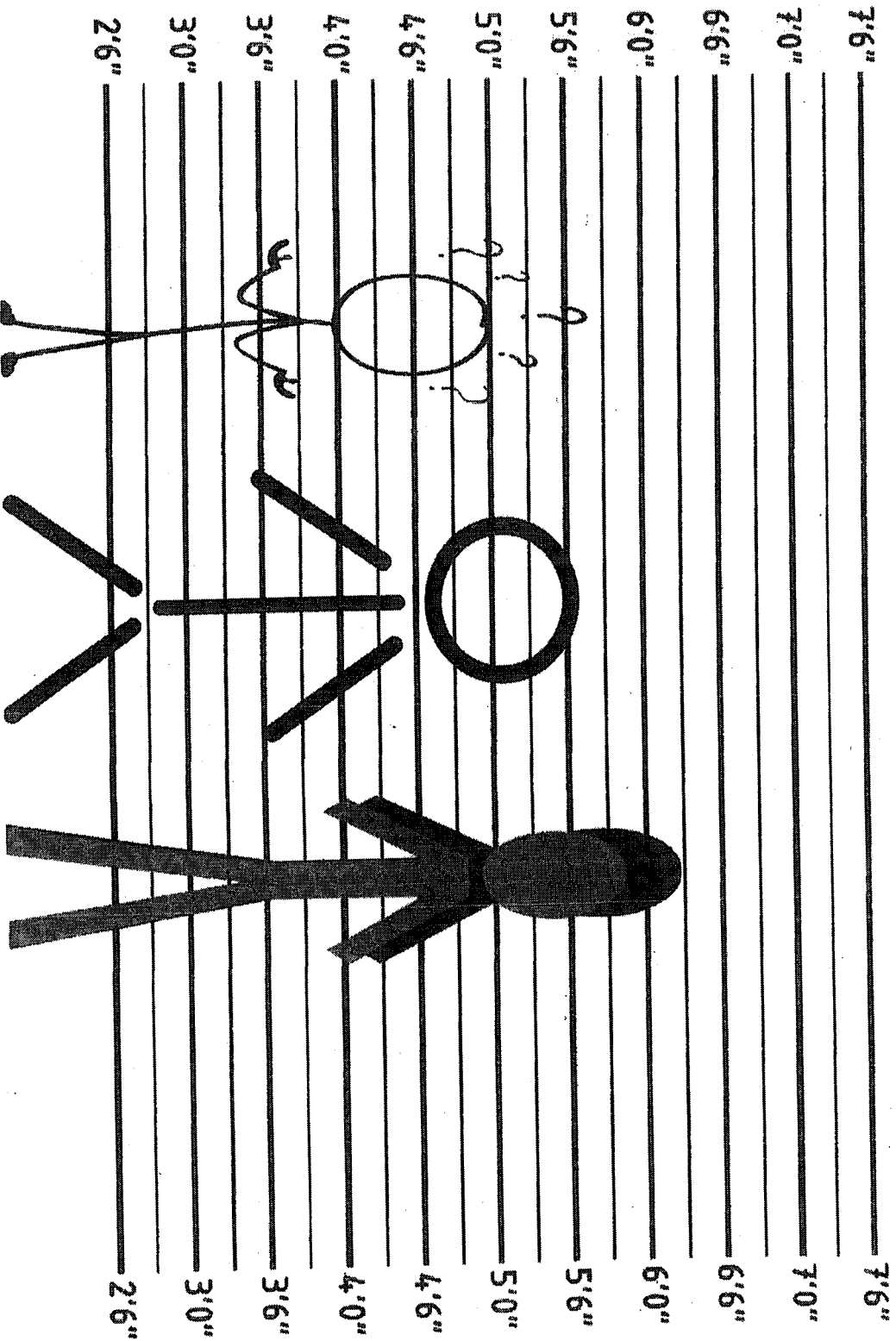
Santiago Garcia (5'7") – the robber is

5'10"

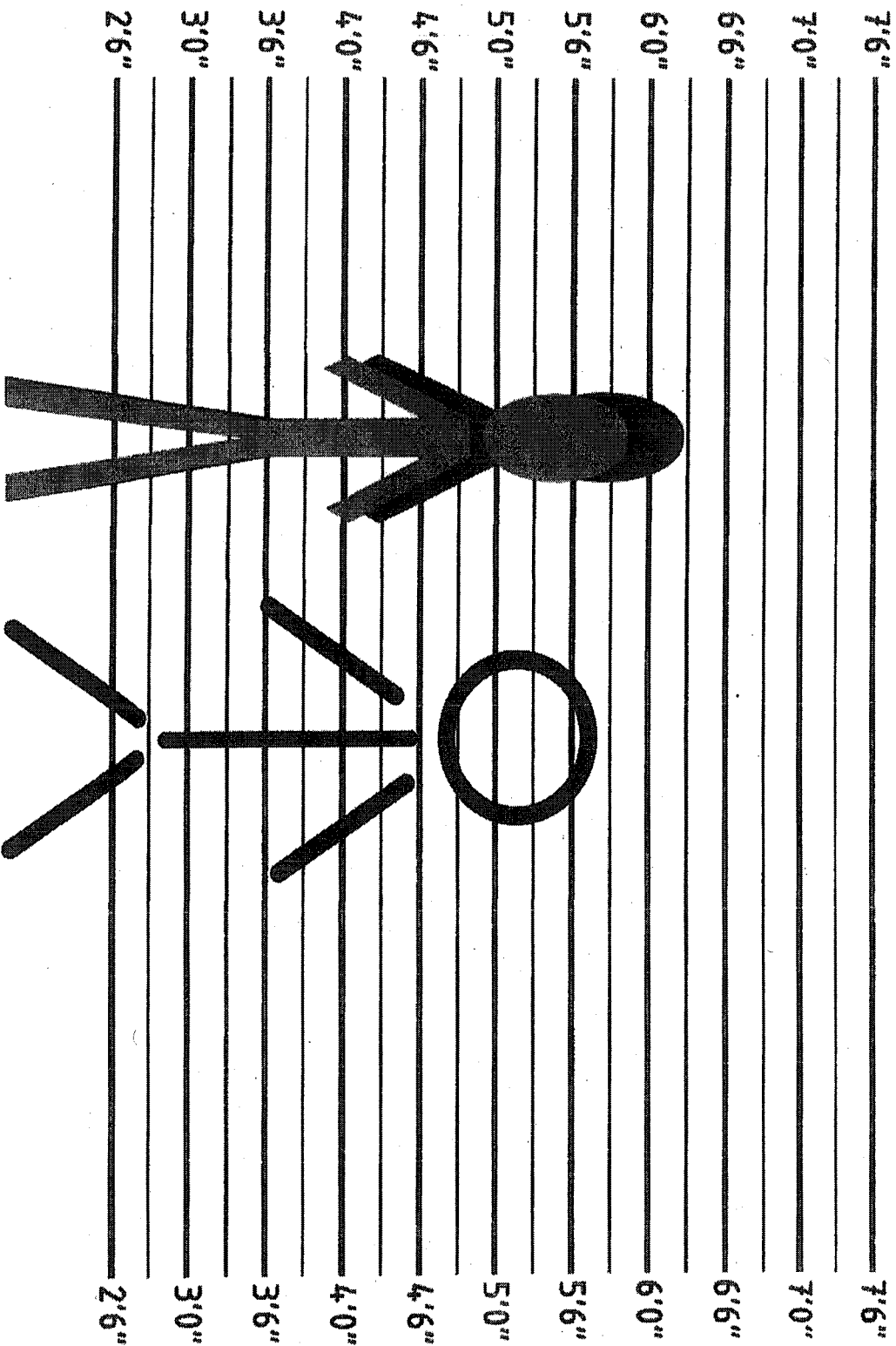


Lazero Bravo-Torres (5') – the robber is

"a little taller" than I am (?)



Rosa Vasquez: "This man is much much taller
than the man who robbed me"



Law Enforcement

- **Detective Ludwig** – good guy, seems thorough, not in charge.
- **Detective Majors** – remembers nothing; lost evidence; didn't record
- **Officer Wise** – Detained Omarq; explained body-cameras

Law Enforcement

- The crime scene analysts – did their jobs!
- DNA Analyst
- Fingerprint Analyst

Deborah Faulkner

Suggestive Identification

Who am Eye?



Easy right?

George W. Bush?



Darrell Faulkner

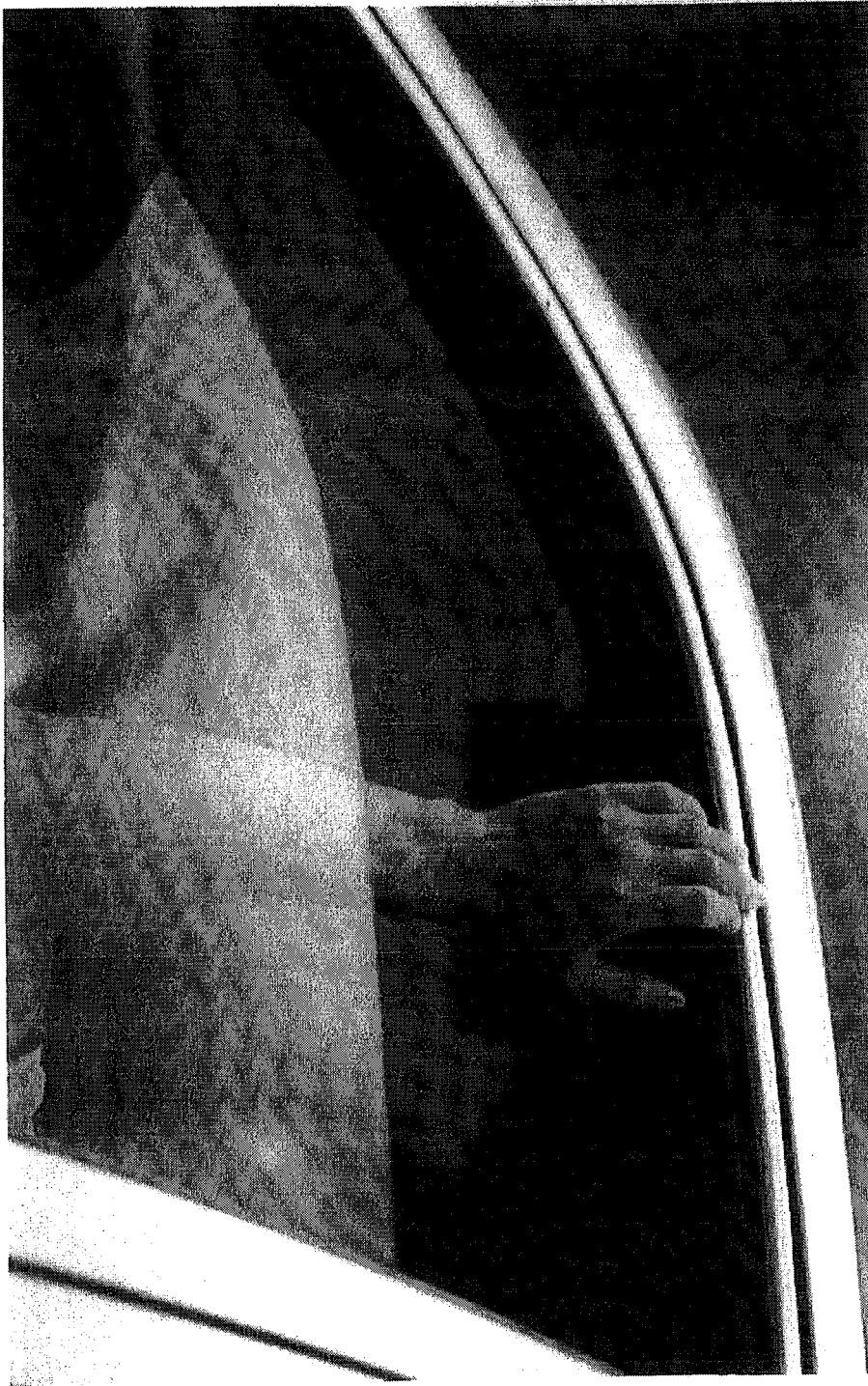
All the details – that were wrong

Darrell Faulkner

- Light blue jeans, blue belt, black shirt with white shirt under it, blue shoes; no tattoos
- Large Frame gun – knows guns
- At grand jury, “black pants” after speaking with the DA
- Memory loss
- “pretty positive”
- Vision

Marvin Bass

6 to 8 inch window



Marvin Bass

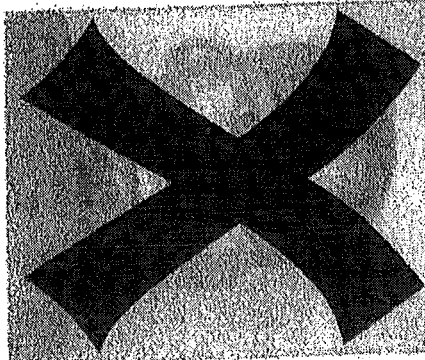
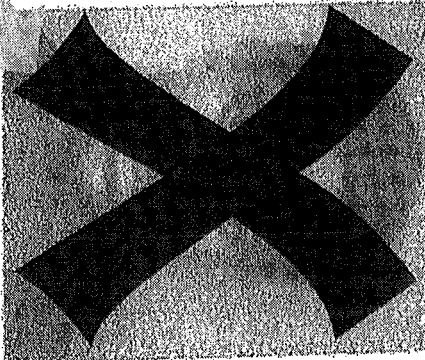
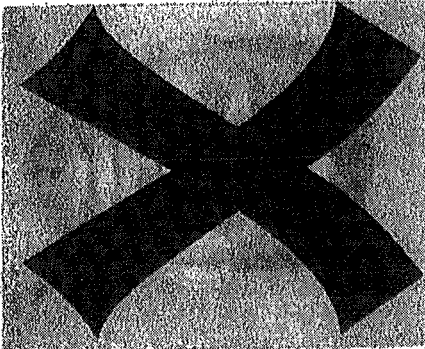
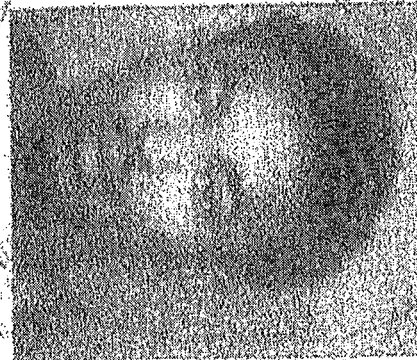
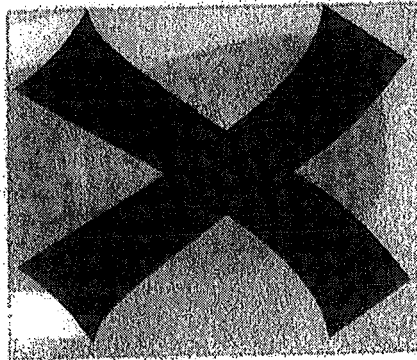
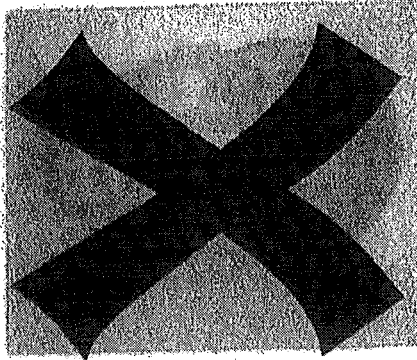
- Robber is shorter than him
- 2-door 'Kia-type' or Fiat (then changed to 4 door after speaking with DA) with RED AND WHITE paper over the plate
- Reported no tattoos (on arms or neck)
- Lineup
- REBUTTAL: Hair is shorter!

Las Vegas Metropolitan Police Department

14-000000-0000

Group B, 5700

01 Jun 2010



FOR OFFICIAL USE ONLY

14-000000-0000

Jordan Alexander

"Hair and thin build is really why I
recognized him..."

Jordan Alexander

- Did not report arm tattoos
- Wallet still missing
- ID'd from 77+ feet away
- No wonder his hair and build were what he recognized
- REBUTTAL: Hair isn't the same; Goatee in photo, robber had mustache only

Lazaro Bravo- Torres

90%

para 11
John M. [unclear]

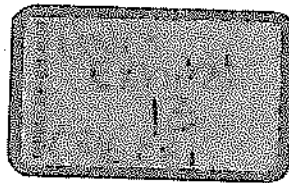
Was magazine ever
recovered?
if only 2 bullets?

Who did gun belong to?
(serial number?)

~~John M. [unclear]~~

~~John M. [unclear]~~
Who was Vernon Taylor?
located?

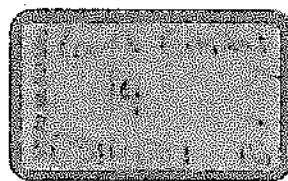
Grier
[signature]



Kelly
Turso #1

Can we please
see the photo
of Bobby McCoy
that this ~~own~~
person compared
to Deandre

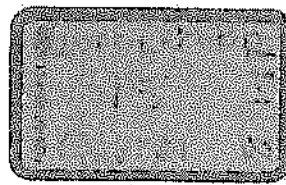
Valentine?



N/A
[Signature]

Levin #020
Can we see
a close up
of Bobby
Moody? &
Next to a
close up of
Kearney?

Not found
AB



Louie #020

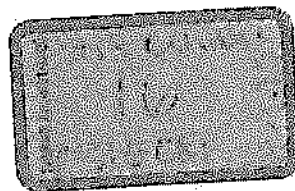
Can we please
Zoom in on

The picture so
we can see the
faces better.

The Show-up

NA (mer

[Signature]



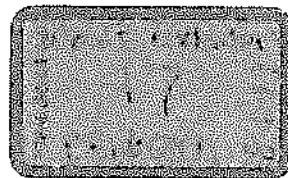
Leave it go
The photo taken
of the two people
from a distance.

Is it possible
that the patrol
officer drove

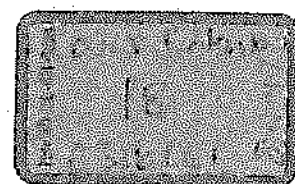
closer after

the picture
was

taken



Not
taken
by
[signature]



Kenif

Juror #7

not answer
HSP

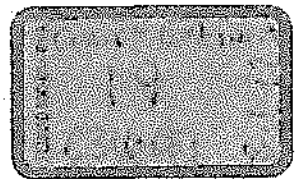
also there any
way to
accurately
determine
the distance
(in feet) between
the suspect and
the police car
that contained
the victims
(in the show ups)

July 11
10

Ellen McFarland

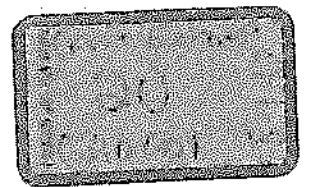
2 people at show up:
if the other show up
person more fits the
description, why did
they not pick the defendant?
please explain why

W. J. Connor
RJ



Dear Mr. Weinstein at 10
(going off the state
you see or Mr. Weinstein (the)
on a note of 1-10,
one hour delay and
10 more days, how
much does P. Ruby
McCoy ~~remember~~ look
like Mrs. Valentine?

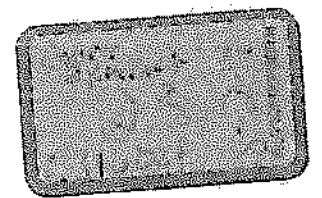
Not Given
AD

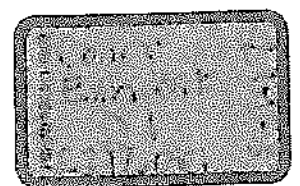


Benjamin Minkoff
#10

was Bobby there
the day after the
Police searched
your Apartment?

Yes
/





AFFIDAVIT

1 STATE OF California
2 COUNTY OF San Diego } ss:
3

4 Nancy Barrera, having been first duly sworn, deposes and states the following:

5 1. I am duly employed by Mazda Vacaville, a Mazda dealership located at 580 Orange
6 Drive, Vacaville, California, and serve as a custodian of records thereof.

7 2. Mazda Vacaville is duly licensed or registered to do business as a car dealership in
8 the State of California.

9 3. Personally, I reviewed purchase information concerning a Mazda3, VIN
10 JM1BM1T77G1344926.

11 4. The subject Mazda3, described in paragraph two, was purchased by Omara McBride
12 on May 25, 2016. It was registered on June 2, 2016 with the California Department of Motor
13 Vehicles ("DMV") as required. The registration dates back to the date of purchase.

14 5. A copy of the California DMV registration that I personally retrieved electronically
15 is attached hereto as Exhibit A. I personally examined the original electronic copy of Exhibit A and
16 made a true and exact copy of the registration; the reproduction depicted in Exhibit A is true and
17 complete.

18 6. The registration depicted in Exhibit A was made at or near the time of the event, to
19 wit: sale and/or registration of the subject Mazda3, concerning which the information was recorded,
20 by or from information transmitted by a person with knowledge of the sale and/or registration; and
21 was kept in the course of regularly conducted business activity at Mazda Vacaville.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 7. I am providing this Affidavit and the attached Exhibit A at the request of Ms. Tegan
2 Machnich, Chief Deputy Public Defender and Ms. Gayland Suaherry, Defense Investigator, in
3 response to a subpoena dated July 20, 2017 requesting documents concerning the "sale pertaining to
4 vehicle with VIN JM1BM1T77G1344926; to include and not limited to date sold and to whom."

5 8. I have not been paid for this affidavit or Exhibit A beyond my costs associated with
6 copying and notarizing the same.

7 I declare under penalty of perjury that the foregoing is true and correct.

8 *Aug 1, 2017*
9 EXECUTED on July ____, 2017.

10 *Nancy Barrera*
11 NANCY BARRERA
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ACKNOWLEDGMENT

STATE OF California)
) ss.

COUNTY OF San Diego)

On the 01 day of August, 2017, personally appeared before me, a Notary Public in and for the said County and State, NANCY BARRERA, who acknowledged to me that the foregoing Affidavit was executed freely and voluntarily and for the uses and purposes therein stated.

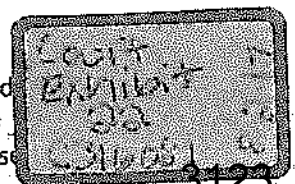
[Signature]
Notary Public

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California, County of San Diego, ss.
On 08/01/17 before me, Nancy Barrera, Notary Public,
personally appeared Nancy Barrera,
who proved to me on the basis of satisfactory evidence to be the person(s) whose
name(s) were submitted to the within instrument and acknowledged to me that
he/she/they executed the same in sufficient authorized capacity(ies), and that by
his/her/their signature(s) on the instrument the person(s) or the entity upon behalf of
which the person(s) acted, executed the instrument. I certify under PENALTY OF
PERJURY under the laws of the State of California that the foregoing paragraph is true
and correct. Witness my hand and seal this 01st day of August, 2017.

EXHIBIT A

Marked
Case #
Propose





1. The first step is to identify the problem. This involves understanding the situation and the goals that need to be achieved.

SCOPE RESPONSE

[GO TO SUMMARY VIEW](#)

DECEASED:	<input type="checkbox"/>	CERT AS ADULT:	<input type="checkbox"/>	WANTED:	<input type="checkbox"/>
WANTED (100):	<input type="checkbox"/>	CONV PERS:	<input type="checkbox"/>	MISS PERS:	<input type="checkbox"/>
ATL:	<input type="checkbox"/>	VICT ID THEFT:	<input type="checkbox"/>	PROTECTION ORDER:	<input type="checkbox"/>
CIVIL WRIT:	<input type="checkbox"/>	MENTAL PET/ASSTD COMMIT:	<input type="checkbox"/>	PROBATION/HOUSE ARREST:	<input type="checkbox"/>
CRIM HIST:	<input type="checkbox"/>	WRK CRD/BUS LIC:	<input type="checkbox"/>	WEAPONS:	<input type="checkbox"/>

PERSON BASE RECORD	CRIMINAL HISTORY	AND MOBILE	
ALL	NOTIFICATION AREA, PRISON, JAIL, FBI, SOLICIT	ADDRESS, PHN, FAX, DOC	INVEST. CHARGE, CL. CAL. CORRECTION AGENCY

TOTAL PHOTOS: 1

ID# 7637896 SID: FBI#:

DL# STATE: LEGACY SID: LEGACY ID#:

DOB: 3/24/1996

NAME: MOCUY, BOBBY EUGENE

DOB: 3/24/1996

SEX: ☒ MALE ☐ F RAC: ☒ BLACK ☐ WHITE ETHNICITY: ☒ HGT: ☒ 510 WGT: ☒ 145 HAIR: ☒ BLK ☐ BRN EYE: ☒ BRO ☐ BLU SKIN TONE: ☒

AGE: ☒ BIRTH CITY: STATE: CA COUNTRY: CITIZENSHIP: ☒ LEP: ☒

ADDR: 852500 WALLACE ST #6, OAKLAND, CA 94601

FP12: SPCs: AGENCY: DATE: AFIS RECORD: NO

FP24:

NOTIFICATIONS[0]

AKA: 1]

154

1294

5554795

517P22

55

△△△△△

$$\sum_{j=0}^n \frac{(-1)^j}{x^{j+1}}$$

2025 DELTA

MCCOY

BOBBY

EUGENE

Figure 1

LVM

12:02:56

□X

FRAUDULENT IDENTIFIERS[01

MONIKERS[0]

POST [4]

45.2°

မိုးကုန်းမြို့နယ်

ADN

2007年12月27日

0163,3272

DOB: 03/24/1996	<input type="radio"/>	LVM	12/09/2016 12:02:56	<input type="checkbox"/>
	<input type="radio"/>	LVM	08/01/2017 07:04:20	<input type="checkbox"/>

SOC[0]

SCARS, MARKS AND TATTOOS[0]

ADDRESS[1]

TYPE	ADDRESS 1	ADDRESS 2	ADDRESS 3	CITY	STATE	ZIP	COUNTRY	MEM POINT	EFFECTIVE DATE	AGY	DEL
RES <input checked="" type="checkbox"/>	12500 WALLACE			OAKLAND	CA	94601		<input type="checkbox"/>	12/08/2015	LVM	<input checked="" type="checkbox"/>
<input type="checkbox"/>								<input type="checkbox"/>	08/01/2017	LVM	<input checked="" type="checkbox"/>

ADDRESS HISTORY[0]

PHONE[0]

PHONE HISTORY[0]

EMAIL/SOCIAL MEDIA[0]

EMAIL/SOCIAL MEDIA HISTORY[0]

NEXT OF KIN[0]

MISCELLANEOUS NUMBERS[0]

DNA[0]

PLACE OF BIRTH[1]

CITY	STATE	COUNTRY	PRIMARY	AGY	EFFECTIVE DATE	DELETE
	CA		<input checked="" type="radio"/>	LVM	12/09/2016 12:02:56	<input checked="" type="checkbox"/>
			<input type="radio"/>	LVM	08/01/2017 07:04:20	<input checked="" type="checkbox"/>

DRIVERS LICENSE[0]

CAUTIONS[0]

COMMENTS[0]

LEGACY INFORMATION[0]

ENTERING AGENCY: LAS VEGAS METRO PD CREATED BY: CLOKED ID: LVM 65/13/743 09:57:29 LAST MODIFIED BY: 7123536 12/09/2016 12:02:56

R2 Branch (REL11256) 06/13/2017 06:00am Common.DLL v1.22
L9312K:LAS VEGAS METRO PD(144-LVM) Flags:0XFFFFFFFFFFFF GROUPS: 65 15993-D1617, 61 15993-D1617, 62 15993-D1617, 61 15993-D1617, 52 15993-D1617, 50 15993-D1617, 7
15993-D1617, 4 All 15993-D1617, 60 15993-D1617, 60 15993-D1617. Timeout at 6/1/2017 5:04:27 PM

ActiveX: C:\AA\36\59\02\85\fe80:191b-988c-879d-e079%3,122,19,66,92\15993-D1617\undefined

Handwritten notes and signatures:
Lisa Kennedy
H94202
Date 8/1/17

(HOME) [BACK] [TOP]

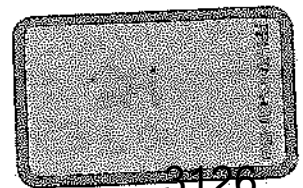
6312x@hampd.com
Copyright 2016 Clark County, SCOPE II v 1.6
08/01/2017 7:04:27 AM

1
2 The Defendant is presumed not guilty unless the contrary is proved. This
3 presumption places upon the State the burden of proving beyond a reasonable doubt every
4 material element of the crime charged and that the Defendant is the person who committed
5 the offense.
6

7 A reasonable doubt is one based on reason. It is not mere possible doubt, but is such
8 a doubt as would govern or control a person in the more weighty affairs of life. If the minds
9 of the jurors, after the entire comparison and consideration of all the evidence, are in such a
10 condition that they can say they feel an abiding conviction of the truth of the charge, there is
11 not a reasonable doubt. Doubt to be reasonable must be actual, not mere possibility or
12 speculation.
13

14
15 If you have a reasonable doubt as to the guilt of the Defendant, he is entitled to a
16 verdict of not guilty.
17
18
19
20
21
22
23
24
25
26
27
28

Not Guilty
Jury



INSTRUCTION NO. _____

The flight of a person immediately after the commission of a crime, is not sufficient in itself to establish his guilt, but is a fact which, if proved, may be considered by you in light of all other proved facts in deciding the question of his guilt or innocence. Whether or not evidence of flight shows a consciousness of guilt and the significance to be attached to such a circumstance are matters for your deliberation.

Not Guilty

INSTRUCTION

Before you may rely on circumstantial evidence to conclude that a fact necessary to find the defendant guilty has been proved, you must be convinced that the State has proved each fact essential to that conclusion beyond a reasonable doubt.

Also, before you may rely on circumstantial evidence to find the defendant guilty, you must be convinced that the only reasonable conclusion supported by the circumstantial evidence is that the defendant is guilty. If you can draw two or more reasonable conclusions from the circumstantial evidence, and one of those reasonable conclusions points to innocence and another to guilt, you must accept the one that points to innocence. However, when considering circumstantial evidence, you must accept only reasonable conclusions and reject any that are unreasonable.

[Handwritten signature]

The lack of flight of a person after he is accused of a crime is not sufficient in itself to establish that he is not guilty, but is a fact that may be considered by you in light of all other proved facts in deciding the question of whether he is guilty or not guilty.²

Not Guilty
P/S

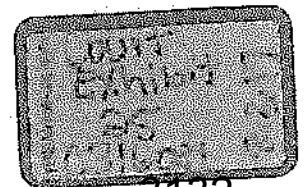
² Given by Dist. Ct., Dept. 20, in *State of Nevada v. Renteria-Novoa* (C-10-268285-1, by the Honorable Judge Tao); *Crawford v. State*, 121 Nev. 744, 121 P.3d 582 (2005); see also, *Walker v. State*, 113 Nev. 853, 870-71 (1997) (holding flight instruction was properly given).

1
2 Because the State failed to preserve the video recovered on May 26, 2016 from the
3 EZ Pawn located on 821 N. Rancho pertaining to the police investigation into the Marvin
4 Bass robbery, it is irrebuttably presumed to have been helpful to the Defendant.
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Because the State failed to preserve the Show-up Identification Form completed by Darrell Faulkner, it is irrebuttably presumed to have been helpful to the Defendant.

Revised
ALB

Every person who, after the commission of a felony, destroys or conceals, or aids in the destruction or concealment of, material evidence, or harbors or conceals such offender with intent that the offender may avoid or escape from arrest, trial, conviction or punishment, having knowledge that such offender has committed a felony or is liable to arrest, is an accessory to the felony.



If you find that the Defendant has acted only as an accessory to the charged offenses,
you must find the Defendant Not Guilty of all charges in this case.

Not Guilty
ALJ

The Defendant is presumed not guilty until unless the contrary is proved. This presumption places upon the State the burden of proving beyond a reasonable doubt every material element of the crime charged and that the Defendant is the person who committed the offense.

A reasonable doubt is one based on reason. It is not mere possible doubt, but is such a doubt as would govern or control a person in the more weighty affairs of life. If the minds of the jurors, after the entire comparison and consideration of all the evidence, are in such a condition that they can say they feel an abiding conviction of the truth of the charge, there is not a reasonable doubt. Doubt to be reasonable must be actual, not mere possibility or speculation.

If you have a reasonable doubt as to the guilt of the Defendant, he is entitled to a verdict of not guilty.

Defense proposed language and strike.

[Handwritten signature and date 11/16/2001]

INSTRUCTION

Before you may rely on circumstantial evidence to conclude that a fact necessary to find the defendant guilty has been proved, you must be convinced that the State has proved each fact essential to that conclusion beyond a reasonable doubt.

Also, before you may rely on circumstantial evidence to find the defendant guilty, you must be convinced that the only reasonable conclusion supported by the circumstantial evidence is that the defendant is guilty. If you can draw two or more reasonable conclusions from the circumstantial evidence, and one of those reasonable conclusions points to innocence and another to guilt, you must accept the one that points to innocence. However, when considering circumstantial evidence, you must accept only reasonable conclusions and reject any that are unreasonable.¹

Accepted
[Signature]

¹ *State v. Supranovich*, Nev.S.Ct No. 68837 (September 24, 2015) (unpublished order); CALCRIM 224

Because the State failed to preserve the Show-up Identification Form completed by Darrell Faulkner, it is irrebuttably presumed to have been helpful to the Defendant.⁴

Handwritten signature/initials

⁴ Sanborn v. State, 107 Nev. 399 (1991).

1
2 Because the State failed to preserve the video recovered on May 26, 2016 from the
3 EZ Pawn located on 821 N. Rancho pertaining to the police investigation into the Marvin
4 Bass robbery, it is irrebuttably presumed to have been helpful to the Defendant.³
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

³ *Sanborn v. State*, 107 Nev. 399 (1991).

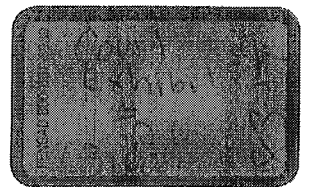
The flight of a person immediately after the commission of a crime, is not sufficient in itself to establish his guilt, but is a fact which, if proved, may be considered by you in light of all other proved facts in deciding the question of his guilt or innocence. Whether or not evidence of flight shows a consciousness of guilt and the significance to be attached to such a circumstance are matters for your deliberation.

Rejected

Kelly, Juror #7
Forepersons

We will deliberate
until 6:15. We
may have a verdict
at that time.

We may need to
come back tomorrow

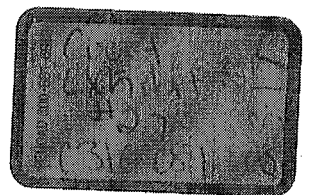


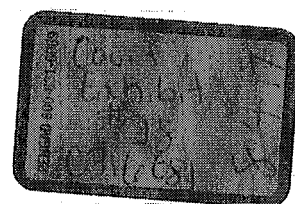
Judge,

The jury would
like to go home.

We would like to
reconvene @ 11 AM
tomorrow.

Thank you,
Kelly
Juror # 7
Foreperson





HOW LITERAL DO WE NEED TO
TAKE "ROBBERY OF MRS F?"

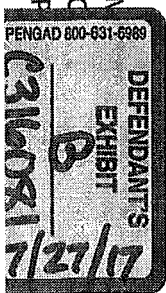
ROBBERY STATES THE TAKING OF
~~PROPERTY~~ ITEMS... HE DID NOT TAKE
ANYTHING FROM MRS F... ONLY
MR F. SHOULDN'T MRS F'S
CHARGE BE "ATTEMPTED
ROBBERY", OR "ASSAULT?"

KEWY

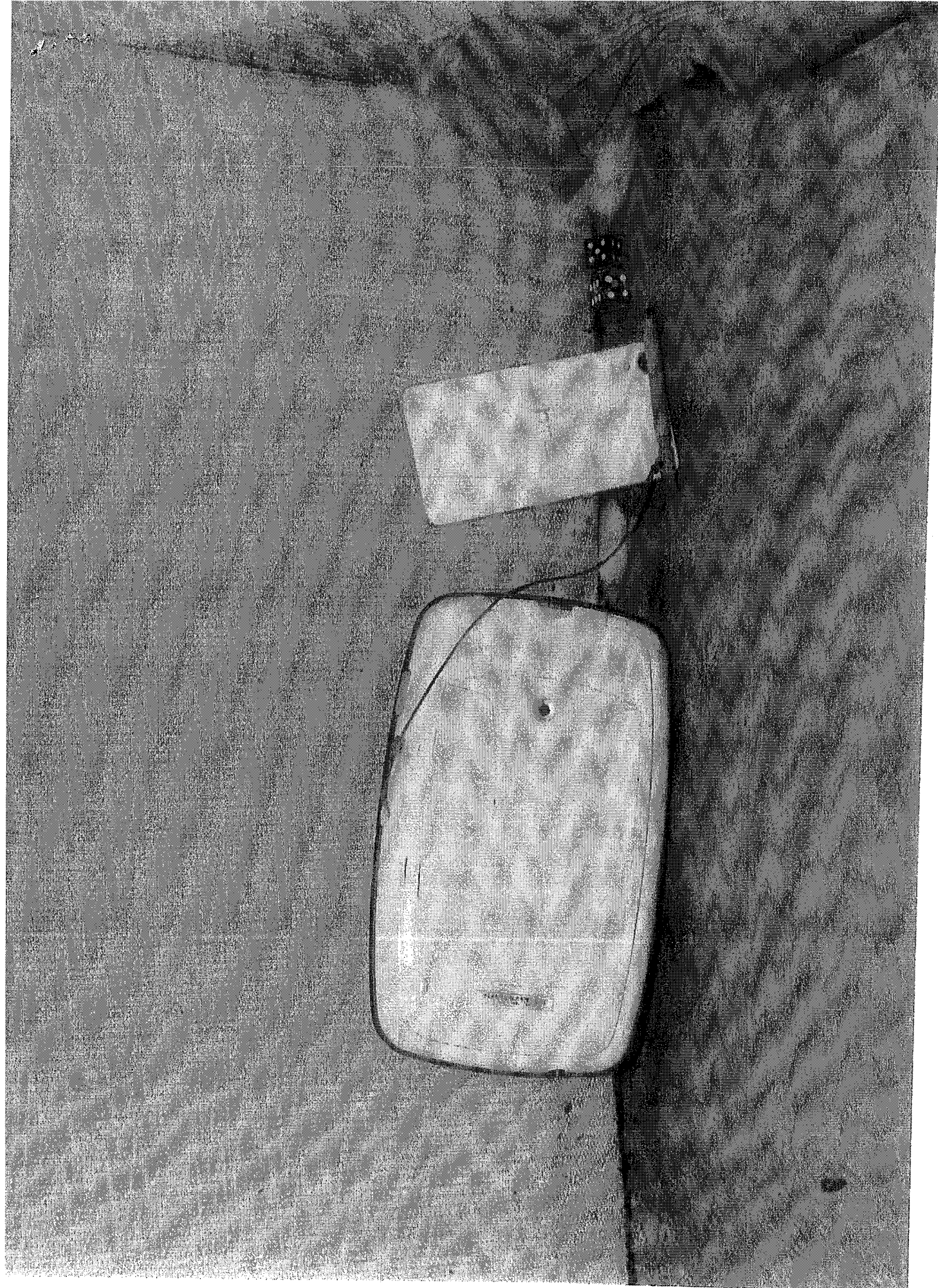
FOREPERSON

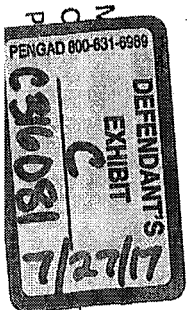
JUROR # 7

The Court is not at
liberty to supplement
the jury instructions.
Please refer to instruction
16. MH

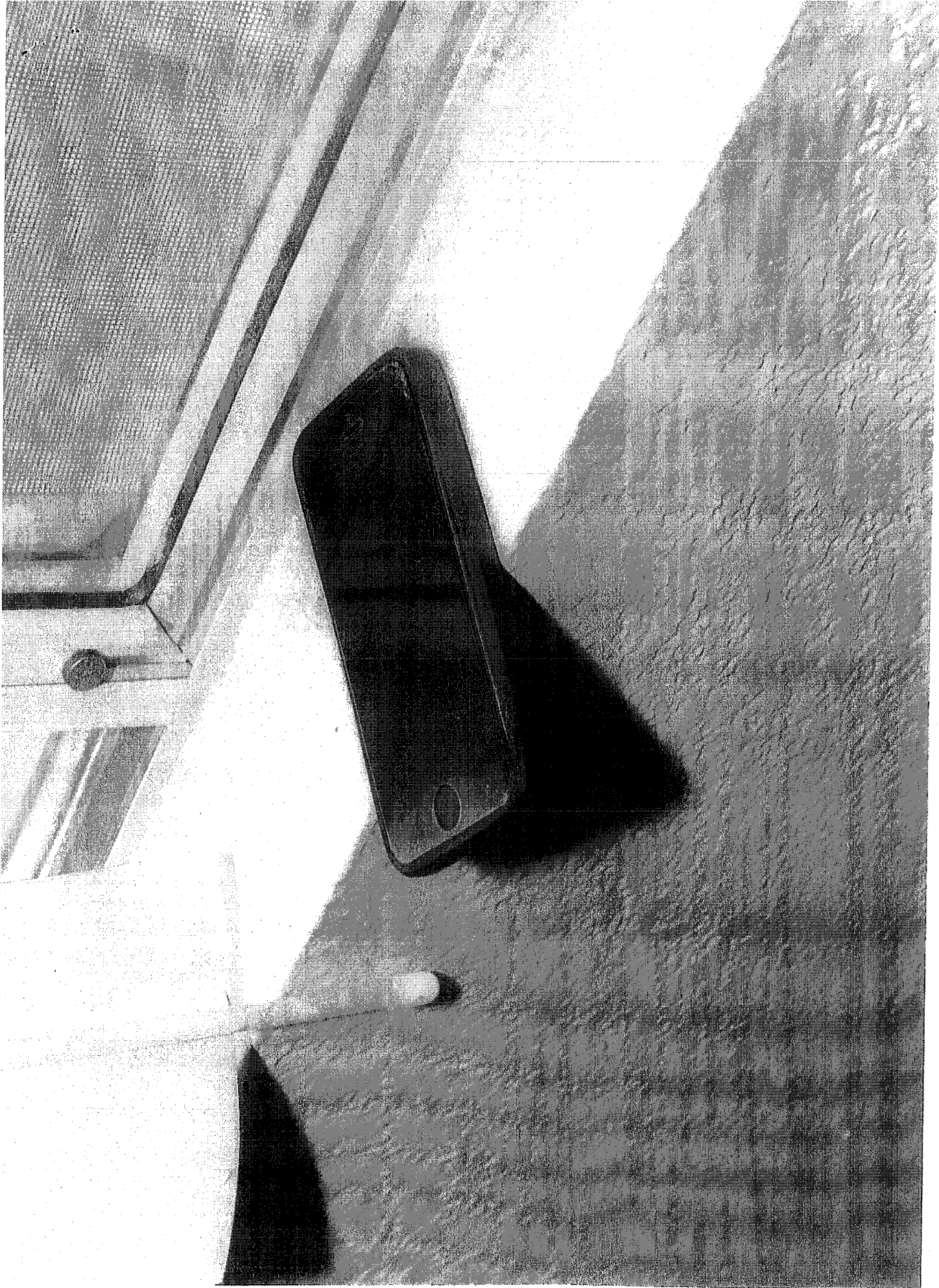


Grand Jury 116AG5046X
Exhibit 19
Dated 28 JUN 16





16AGJO46X
15
28 JUN 16





Grand Jury 16AGJO46X
Exhibit 14
Date: 28 Jun 16



- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Electronically Filed
Aug 08 2018 03:07 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

APPELLANT'S APPENDIX VOLUME XIV PAGES 2990-3229

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

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

Counsel for Respondent

INDEX
KEANDRE VALENTINE
Case No. 74468

PAGE NO.

1		
2		
3	Amended Jury List filed 07/28/17	657
4	Amended Notice of Department Reassignment filed 09/20/17	825-826
5	Court's Exhibit 1 dated 07/24/17.....	3064-3080
6	Court's Exhibit 2 dated 07/24/17.....	3081
7	Court's Exhibit 3	3082
8	Court's Exhibit 4	3083
9	Court's Exhibit 5	3084
10	Court's Exhibit 6 dated 07/31/17.....	3085
11	Court's Exhibit 7 dated 07/31/17.....	3086
12	Court's Exhibit 8 dated 07/31/17.....	3087
13	Court's Exhibit 9 dated 07/31/17.....	3088-3091
14	Court's Exhibit 10 dated 07/31/17.....	3092-3093
15	Court's Exhibit 11 dated 07/31/17.....	3094-3103
16	Court's Exhibit 12 dated 07/31/17.....	3104-3107
17	Court's Exhibit 13	3108
18	Court's Exhibit 14 dated 08/01/17.....	3109
19	Court's Exhibit 15 dated 08/01/17.....	3110
20	Court's Exhibit 16 dated 08/01/17.....	3111
21	Court's Exhibit 17 dated 08/01/17.....	3112
22	Court's Exhibit 18 dated 08/01/17.....	3113-3114
23	Court's Exhibit 19 dated 08/01/17.....	3115
24	Court's Exhibit 20 dated 08/01/17.....	3116
25	Court's Exhibit 21 dated 08/01/17.....	3118-3122
26	Court's Exhibit 22 dated 08/02/17.....	3123-3125
27	Court's Exhibit 23 dated 08/02/17.....	3117
28	Court's Exhibit 24	3126-3131

1	Court's Exhibit 25 dated 08/03/17.....	3132-3138
2	Court's Exhibit 26 dated 08/03/17.....	3139
3	Court's Exhibit 27 dated 08/03/17.....	3140
4	Court's Exhibit 28 dated 08/04/17.....	3141-3142
5	Court's Exhibit 29 dated 08/04/17.....	3159-3229
6	Defendant's Exhibit A dated 07/27/17	3232-3233
7	Defendant's Exhibit A dated 07/27/17	3244-3245
8	Defendant's Exhibit B dated 07/27/17	3143-3144
9	Defendant's Exhibit C dated 07/27/17	3145-3146
10	Defendant's Exhibit D dated 07/27/17	3147-3148
11	Defendant's Exhibit F dated 07/31/17.....	3149-3150
12	Defendant's Exhibit G dated 07/31/17	3151-3152
13	Defendant's Exhibit H dated 07/31/17	3153-3154
14	Defendant's Exhibit I dated 07/31/17.....	3155-3156
15	Defendant's Exhibit J dated 07/31/17	3157-3158
16	Defendant's Motion to Reconstruct the Record Date of Hrg: 07/02/18.....	3253-3310
17	Defendant's Notice of Alibi Witness filed 07/14/17	518-625
18	Defendant's Notice of Expert Witnesses filed 06/30/17	265-293
19	Defendant's Notice of Non-Opposition to State's Motion to Compel Reciprocal Discovery filed 07/17/17	641-642
20	Defendant's Notice of Witnesses filed 07/13/17	516-517
21	District Court Minutes dated 07/02/18	3252
22	District Court Minutes from 06/29/16 through 09/28/17	841-881
23	Ex Parte Motion and Order for Release of Evidence filed 12/01/17.....	837-838
24	Ex Parte Motion and Order for Release of Evidence filed 12/08/17.....	839-840
25	Judgment of Conviction filed 10/16/17	827-831
26	Jury List filed 07/25/17.....	656
27	Indictment filed 06/29/16	1-6

1	Indictment Warrant Return filed 06/30/16	7-8
2	Instructions to the Jury filed 08/04/17	770-818
3	Media Request and Order for Camera Access to Court Proceedings filed 07/11/16	114-115
4	Motion for Production of Discovery Date of Hrg: 09/01/16	185-210
5	Notice of Appeal filed 11/06/17	832-836
6	Notice of Court Exhibits Added to the Trial Record filed 07/10/18	3314-3334
7	Notice of Department Reassignment filed 09/19/17	823-824
8	Notice of Intent to Seek Punishment as a Habitual Criminal filed 01/27/17	251-252
9	Notice of Motion and Motion Outlining State's Discovery Compliance Date of Hrg: 02/21/17	253-261
10	Notice of Motion and Motion to Compel Reciprocal Discovery Procedural History Date of Hrg: 08/03/17	635-640
11	Notice of Motion and Motion to Exclude Eyewitness Expert Testimony Date of Hrg: 07/20/17	294-331
12	Notice of Motion and Motion to Strike Alibi Notice Date of Hrg: 08/03/17	643-647
13	Notice of Motion and Motion to Strike Defendant's Supplemental Notice of Expert Witnesses Date of Hrg: 08/03/17	626-630
14	Notice of Rebuttal Alibi Witness filed 07/24/17	654-655
15	Notice of Witnesses and/or Expert Witnesses filed 07/28/16	116-119
16	Opposition to State's Motion to Exclude Eye-Witness Expert Testimony filed 07/19/17	332-515
17	Opposition to State's Motion to Strike Alibi Notice filed 07/18/17	648-653
18	Opposition to State's Motion to Strike Defendant's Supplemental Notice of Expert Witnesses Date of Hrg: 07/20/17	631-634
19	Order filed 07/25/18	3311-3313
20	Proposed Exhibit K	3246-3247
21	Proposed Exhibit L	3248-3249
22	Proposed Exhibit U	3250-3251
23	Receipt of Copy: List of Discovery Items	

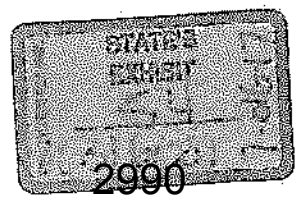
1	Provided to Defense filed 06/06/17	262-264
2	Second Amended Jury List filed 08/03/17	769
3	Second Supplemental Notice of Witnesses and/or Expert Witnesses filed 09/20/16.....	237-242
4	State's Exhibit 13 dated 07/26/17.....	3230-3231
5	State's Exhibit 33 dated 07/26/17.....	3232-3233
6	State's Exhibit 48 dated 07/26/17.....	3343-3344
7	State's Exhibit 52 dated 07/26/17.....	3000-3001
8	State's Exhibit 52 dated 07/26/17.....	3234-3235
9	State's Exhibit 54 dated 07/26/17.....	2990-2991
10	State's Exhibit 57 dated 07/26/17.....	3236-3237
11	State's Exhibit 171 dated 07/26/17.....	3002-3014
12	State's Exhibit 172 dated 07/26/17.....	3015-3026
13	State's Exhibit 175 dated 07/22/17.....	3027-3037
14	State's Exhibit 182 dated 07/28/17.....	3038-3047
15	State's Exhibit 183 dated 07/31/17.....	3335-3336
16	State's Exhibit 184 dated 07/31/17.....	3337-3339
17	State's Exhibit 185 dated 07/31/17.....	3340-3342
18	State's Exhibit 186 dated 07/31/17.....	3048-3049
19	State's Exhibit 187 dated 07/31/17.....	3050-3051
20	State's Exhibit 188 dated 07/31/17.....	3238-3239
21	State's Exhibit 192 dated 08/01/17.....	3240-3242
22	State's Exhibit 193 dated 07/31/17.....	3055-3057
23	State's Exhibit 194 dated 07/31/17.....	3052-3054
24	State's Exhibit 195 dated 07/31/17.....	3058-3063
25	State's Exhibit 196 dated 08/02/17.....	3242-3243
26	State's Exhibit 197 dated 08/02/17.....	2992-2993
27	State's Exhibit 198 dated 08/02/17.....	2994-2995
28		

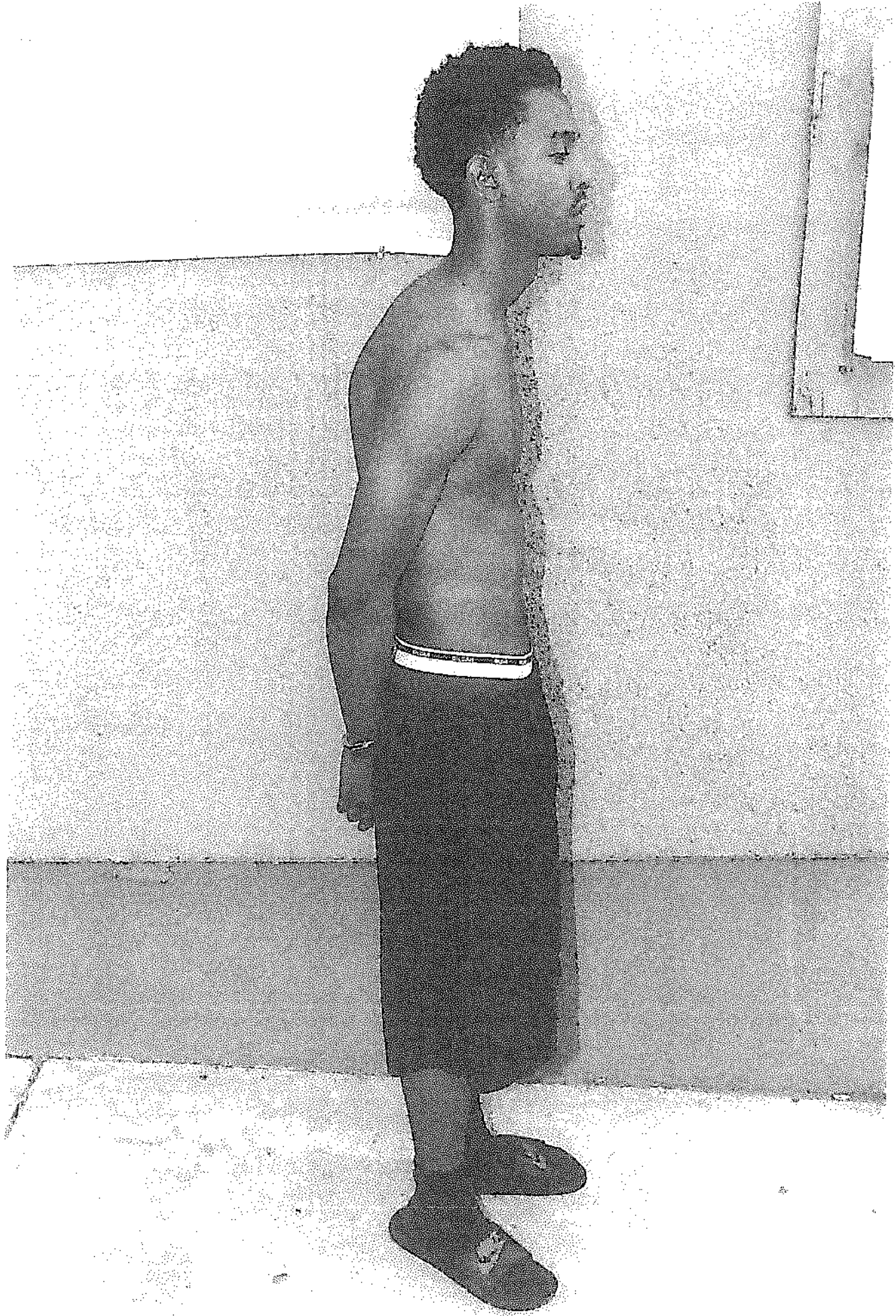
1	State's Exhibit 199 dated 08/02/17.....	2996-2997
2	State's Exhibit 200 dated 08/02/17.....	2998-2999
3	State's Motion in Limine to limit Testimony of Dr. Steven Smith	
4	Date of Hrg: 07/31/17.....	658-768
5	State's Response to Defendant's Motion for Production of Discovery	
6	Date of Hrg: 09/01/16.....	211-236
7	Supplemental Notice of Witnesses and/or	
8	Expert Witnesses filed 08/12/16.....	120-184
9	Third Supplemental Notice of Witnesses	
10	and/or Expert Witnesses filed 01/26/17.....	243-250
11	Verdict filed 08/04/17.....	819-822

TRANSCRIPTS

12	Recorder's Transcript	
13	JURY TRIAL DAY 1	
14	Date of Hrg: 07/24/17.....	937-1238
15	Recorder's Transcript	
16	JURY TRIAL DAY 2	
17	Date of Hrg: 07/25/17.....	1239-1426
18	Recorder's Transcript	
19	JURY TRIAL DAY 3	
20	Date of Hrg: 07/26/17.....	1427-1625
21	Recorder's Transcript	
22	JURY TRIAL DAY 4	
23	Date of Hrg: 07/27/17.....	1626-1799
24	Recorder's Transcript	
25	JURY TRIAL DAY 5	
26	Date of Hrg: 07/28/17.....	1800-2021
27	Recorder's Transcript	
28	JURY TRIAL DAY 6	
29	Date of Hrg: 07/31/17.....	2022-2341
30	Recorder's Transcript	
31	JURY TRIAL DAY 7	
32	Date of Hrg: 08/01/17.....	2341-2529
33	Recorder's Transcript	
34	JURY TRIAL DAY 8	
35	Date of Hrg: 08/02/17.....	2530-2812
36	Recorder's Transcript	
37	JURY TRIAL DAY 9	
38	Date of Hrg: 08/03/17.....	2813-2947

1	Recorder's Transcript JURY TRIAL DAY 10	
2	Date of Hrg: 08/04/17	2948-2957
3	Recorder's Transcript Calendar Call	
4	Date of Hrg: 02/16/17	894-898
5	Recorder's Transcript Calendar Call and Defendant's Motion for Production of Discovery	
6	Date of Hrg: 09/01/16	890-893
7	Recorder's Transcript Defendant's Motion for Setting of Reasonable Bail	
8	Date of Hrg: 10/04/16	893a-893f
9	Recorder's Transcript Defendant's Request Re: Stipulated Status Check-Trial Setting	
10	Date of Hrg: 06/06/17	904-911
11	Recorder's Transcript Grand Jury Return	
12	Date of Hrg: 06/29/16	882-884
13	Recorder's Transcript Initial Arraignment and Indictment Warrant Return	
14	Date of Hrg: 07/07/16	885-889
15	Recorder's Transcript Motion Outlining State's Discovery Compliance and Status Check: Trial Setting	
16	Date of Hrg: 02/21/17	899-903
17	Recorder's Transcript Sentencing	
18	Date of Hrg: 09/28/17	2958-2989
19	Recorder's Transcript State's Motion to Exclude Eyewitness Expert Testimony and Calendar Call	
20	Date of Hrg: 07/20/17	912-921
21	Recorder's Transcript State's Motion to Exclude Eyewitness Expert Testimony, State's Motion to Strike Alibi Notice, and State's Motion to Strike Defendant's Supplemental Notice of Expert Witnesses	
23	Date of Hrg: 07/24/17	929-936
24	Recorder's Transcript State's Motion to Exclude Eyewitness Expert Testimony; State's Motion to Strike Alibi Notice and State's Motion to Strike Defendant's Supplemental Notice of Expert Witnesses; Overflow	
26	Date of Hrg: 07/21/17	922-928
27	Reporter's Transcript Grand Jury	
28	Date of Hrg: 06/28/16	9-113





SuperPawn Promises to You:

- You will be treated with respect.
- You will receive the "lowest" loan amounts on our valuables.
- You will experience a clean, well lighted and organized store.

It's How It Works:

At your first visit, we input the information our computerized evaluator called TOPS™

into its database. It knows what the item sold for new, what the current market price is, and the fair loan value given its current condition.

It's TOPS™ as the ultimate expert!

SUPERPAWN SPECIAL OFFER

(Nevada Customers)

At any time on or before your loan's current Due Date (the original or extended Due Date) you may enter into a new loan agreement that provides for a revised Due Date that will be 90 days from the renewal date by paying the earned interest charges, plus the \$5.00 Origination Fee (if such fee has not been previously paid). Loan renewals entered into after the current Due Date will be subject to a \$10.00 Late Fee (if such fee has not been previously paid) and additional interest charges.

OR

At any time on or before your loan's current Due Date, you may extend your loan for an additional 30 days by paying 30 days interest charges, plus the \$5.00 Origination Fee (if such fee has not been previously paid). Loan extensions entered into after the current Due Date will be subject to a \$10.00 Late Fee (if such fee has not been previously paid), plus the \$5.00 Deferral Fee.

Did You Know?

- We do Payday loans.
- We are the largest chain pawnshop company in the country.
- We sell graded and/or certified diamonds.
- We provide expert jewelry repair.
- We offer interest-free layaways.

Mail-In Redemptions:

Pawned Jewelry may be redeemed by mail. The cost of packing, shipping and insurance is \$25. If you wish to take advantage of this service, please contact your SuperPawn store for instructions.

Renew Your Loan

See the SUPERPAWN SPECIAL OFFER for details.

Extend Your Loan

See the SUPERPAWN SPECIAL OFFER for details.

Retain This Ticket

A pawn ticket will be needed to redeem collateral.

FORMER PRIVACY NOTICE

Cash America may collect "nonpublic personal information" about you from the following sources:

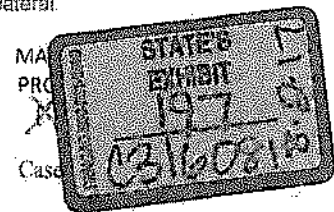
Information received from you on applications, pawn forms, loan documents, sales documents, or other forms, such as your name, address, social security number, assets and income;

Information about your transactions with Cash America, its affiliates or others such as payment history and loan balances; and

Information we receive from third parties, such as consumer reporting agencies and other lenders, regarding creditworthiness and credit history.

"Nonpublic personal information" is information we obtain in connection with providing you with financial services including, but not limited to, short term loans. Examples of nonpublic personal information include your name, social security number, credit history, and credit reports. Cash America does not disclose any nonpublic personal information about its pawn ticket or former pawn customers to anyone except its affiliates for servicing purposes, or as permitted by law.

Cash America restricts access to nonpublic personal information about its customers to only those employees that need that information to provide you with products or services. Cash America maintains physical, electronic, and procedural safeguards in compliance with applicable law to guard your nonpublic personal information.



CUSTOMER PRIVACY NOTICE ON BACK

SUPERPAWN SPECIAL OFFER

SuperPawn offers **extensions** and **renewals** for your pawn loans.

(See back of pawn ticket for details.)

CashAmerica
SUPER PAWN

© 2016 Cash America Fund, Inc. Nevada Pawn Ticket 05.0316

PAWN CONTRACT: For and in consideration of the sum paid to me by SuperPawn, I, the undersigned, do hereby pledge to SuperPawn, and grant a security interest in, the property described herein, possession of which is delivered to SuperPawn as security and collateral for the amount loaned plus accrued interest and charges. If I fail to pay to SuperPawn the **AMOUNT FINANCED** plus **FINANCE CHARGES** within 90 days hereof, then I acknowledge that the property held as collateral shall be forfeited at SuperPawn's sole discretion, and an automatic transfer of ownership to SuperPawn may occur without process of law or foreclosure proceedings. In consideration of the sum paid to me, I relieve SuperPawn of liability for loss or damage to the property from fire, flood, simple negligence or any criminal conduct. In the event of liability on the part of SuperPawn for any loss or damage to the property, it is stipulated that damages shall be liquidated in the amount of the loan plus interest owed.

SALE CONTRACT: I agree to transfer and sell undisputed title to the property to SuperPawn for the amount specified herein. In exchange for the amount paid, I hereby relinquish all claims to recovery of the property.

FULL NAME AND ADDRESS OF BORROWER / SELLER OMARA D MCBRIDE 2134 CANYON CREEK CT NEWMAN, CA 95360	SEX F	DATE OF BIRTH 12/13/1994	HEIGHT 5'4	WEIGHT 120	EYES BLK	HAIR BKL	RACE B	SUPERPAWN EMPLOYEE 33474	SUPERPAWN LOCATION FOR THIS TRANSACTION: 5910 W. Lake Mead Las Vegas, NV 89108 (702) 438-2123
	IDENTIFICATION PRESENTED ID-CA-F2910400		TRANSACTION DATE / TIME 05/26/2016 14:46			PRIOR TRANSACTION NUMBER N/A		LOCATION CODE N/A	
TRANSACTION TYPE PURCHASE									

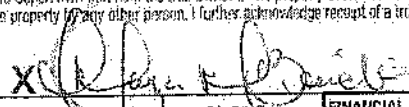
DESCRIPTION OF PROPERTY - YOU ARE GIVING A SECURITY INTEREST IN THE FOLLOWING PROPERTY:
(1) FLAT CHAIN, Y/G, 10 KT., APPROX 10.9 GRM; 23 IN.; GUTCI; GENDER N/A;
BROKEN CLASP;

AMOUNT FINANCED: The amount of cash given directly to you.	\$ 240.00
FINANCE CHARGE: The dollar amount the credit will cost you.	\$ N/A
TOTAL OF PAYMENTS: Amount required to redeem on due date.	\$ N/A
ANNUAL PERCENTAGE RATE: The cost of your credit as a yearly rate.	N/A%

PAYMENT SCHEDULE: TOTAL OF PAYMENTS is due on the DUE DATE.
PREPAYMENT: If you pay off early, you will not be entitled to a refund of part of the FINANCE CHARGE.

SECURITY: The loan is secured by the personal property described above.
LATE FEE: Renewals, extensions or redemptions of your loan after the Due Date will be subject to a \$10 Late Fee, Deferral Fee (where applicable), plus additional interest charge.

My signature confirms that I have read and agree to all terms of the contract and that all information I have given is correct. I further acknowledge receipt of the dollar amount loaned or paid by SuperPawn for the property. To transfer property in violation of the rights of the true owner is criminal. By signing, I assure SuperPawn that I am the true owner of the property described herein with the legal right to pledge or sell and at there is no security in the property to any other person. I further acknowledge receipt of a true copy of this contract.

Customer Signature: 

0-30 Days N/A thru 06/25/2016	31-60 Days N/A thru 07/25/2016	61-90 Days N/A thru 08/24/2016
--	---	---

DATE DUE: N/A	TICKET NUMBER: 482202
------------------	--------------------------

FINANCIAL TERMS: FEES AND CHARGES. You agree to pay the following fees and charges associated with your loan: (1) an Origination Fee of \$5.00, which will be collected only once per loan on the first cash transaction (redemption, renewal, or extension); (2) Interest in an amount equal to 13% of the Amount Financed for each 30-day period the loan is outstanding and is fully earned on the first day of each such 30-day period; (3) a Late Fee of \$10.00, which will be charged only once per loan on the first cash transaction (redemption, renewal, or extension) after the initial Due Date; (4) a Deferral Fee of \$5.00, which will be charged for each extension executed by you after the initial Due Date; and (5) a Lost Ticket Fee of \$5.00, which will be charged to reproduce a duplicate pawn ticket. The term of this loan contract is 90 days. See the remainder of this contract for any additional information concerning nonpayment and default.

Our SuperPawn Promise to You:

- You will be treated with respect.
- You will receive the "fairest" loan amounts on your valuables.
- You will experience a clean, well lit and pleasant store.

Here's how it Works:

When you bring in a valuable, we input the information into our computerized evaluator called TOPS™.

TOPS™ knows what the item sold for new, what the current resale price is, and the fair loan value given its current condition.

Think of TOPS™ as the ultimate expert.

SUPERPAWN SPECIAL OFFER
(Nevada Customers)

At any time on or before your loan's current Due Date (the original or extended Due Date) you may enter into a new loan agreement that provides for a revised Due Date that will be 30 days from the renewal date by paying the earned interest charges, plus the \$5.00 Origination Fee (if such fee has not been previously paid). Loan renewals entered into after the current Due Date will be subject to a \$10.00 Late Fee (if such fee has not been previously paid) and additional interest charges.

OR

At any time on or before your loan's current Due Date, you may extend your loan for an additional 30 days by paying 30 days' interest charges, plus the \$5.00 Origination Fee (if such fee has not been previously paid). Loan extensions entered into after the current Due Date will be subject to a \$10.00 Late Fee (if such fee has not been previously paid), plus the \$5.00 Deferral Fee.

Did You Know?

- We do Payday loans.
- We are the largest chain pawnshop company in the country.
- We sell graded and certified diamonds.
- We provide expert jewelry repair.
- We offer interest-free layaways.

Mail-In Redemptions

Pawned Jewelry may be redeemed by mail. The cost of packing, shipping and insurance is \$25. If you wish to take advantage of this service, please contact your SuperPawn store for instructions.

Renew Your Loan

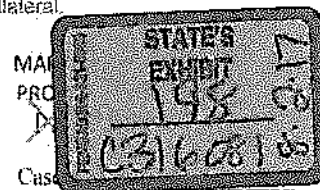
See the SUPERPAWN SPECIAL OFFER for details.

Extend Your Loan

See the SUPERPAWN SPECIAL OFFER for details.

Retain This Ticket

A pawn ticket will be needed to redeem collateral.



CUSTOMER PRIVACY NOTICE

Cash America may collect "nonpublic personal information" about you from the following sources:

- Information received from you on applications, pawn forms, loan documents, sales documents, or other forms, such as your name, address, social security number, assets and income;
- Information about your transactions with Cash America, its affiliates or others such as payment history and loan balances; and
- Information we receive from third parties, such as consumer reporting agencies and other lenders, regarding creditworthiness and credit history.

"Nonpublic personal information" is information we obtain in connection with providing you with financial services including, but not limited to, short term loans. Examples of nonpublic personal information include your name, social security number, payment history, and credit reports. Cash America does not disclose any nonpublic personal information about its pawn customers or former pawn customers to anyone except its affiliates for servicing purposes, or as permitted by law.

Cash America restricts access to nonpublic personal information about its customers to only those employees that need that information to provide you with products or services. Cash America maintains physical, electronic, and procedural safeguards that comply with applicable law to guard your nonpublic personal information.

SUPERPAWN SPECIAL OFFER

SuperPawn offers **extensions** and **renewals** for your pawn loans.

(See back of pawn ticket for details.)

CashAmerica
SUPER PAWN

© 2015 Cash America West, Inc. *Standard Pawn Ticket 03.2015

PAWN CONTRACT: For and in consideration of the sum paid to me by SuperPawn, I, the undersigned, do hereby pledge to SuperPawn, and grant a security interest in, the property described herein, possession of which is delivered to SuperPawn as security and collateral for the amount loaned plus accrued interest and charges. If I fail to pay to SuperPawn the **AMOUNT FINANCED** plus **FINANCE CHARGES** within 90 days hereof, then I acknowledge that the property held as collateral shall be forfeited at SuperPawn's sole discretion, and an automatic transfer of ownership to SuperPawn may occur without process of law or foreclosure proceedings. In consideration of the sum paid to me, I relieve SuperPawn of liability for loss or damage to the property from fire, flood, simple negligence or any criminal conduct. In the event of liability on the part of SuperPawn for any loss or damage to the property, it is stipulated that damages shall be liquidated in the amount of the loan plus interest owed.

SALE CONTRACT: I agree to transfer and sell undisputed title to the property to SuperPawn for the amount specified herein, in exchange for the amount paid. I hereby relinquish all claims to recovery of the property.

FULL NAME AND ADDRESS OF BORROWER / SELLER OMARA D MCBRIDE 2134 CANYON CREEK CT NEWMAN, CA 95360	SEX F	DATE OF BIRTH 12/13/1994	HEIGHT 5/4	WEIGHT 120	EYES BLK	HAIR BKL	RACE B	SUPERPAWN EMPLOYEE 33474	SUPERPAWN LOCATION FOR THIS TRANSACTION: 5910 W. Lake Mead Las Vegas, NV 89108 (702) 438-2123
	IDENTIFICATION PRESENTED ID-CA-P2910400			TRANSACTION DATE / TIME 05/26/2016 14:48			PRIOR TRANSACTION NUMBER N/A		
								AGGREGATE CHARGE N/A	
								TRANSACTION TYPE PURCHASE	

DESCRIPTION OF PROPERTY - YOU ARE GIVING A SECURITY INTEREST IN THE FOLLOWING PROPERTY:

111 PLAT CHAIN; Y/G; 10 KT.; APPRX. 12.4 GRM; 22 IN.; SIGARO; GENDER N/A;
A; BROKEN CLASP;

AMOUNT FINANCED:

The amount of cash given directly to you: \$ 155.00

FINANCE CHARGE:

The dollar amount the credit will cost you: \$ N/A

TOTAL OF PAYMENTS:

Amount required to redeem on due date: \$ N/A

ANNUAL PERCENTAGE RATE:

The cost of your credit as a yearly rate: N/A%

PAYMENT SCHEDULE: TOTAL OF PAYMENTS is due on the DUE DATE.

PREPAYMENT: If you pay off early, you will not be entitled to a refund of part of the FINANCE CHARGE.

SECURITY: The loan is secured by the personal property described above.

LATE FEE: Renewals, extensions or redemptions of your loan after the Due Date will be subject to a \$10 Late Fee, Deferral Fee (where applicable), plus additional interest charge.

My signature confirms that I have read and agree to all terms of this contract and that all information I have given is correct. I further acknowledge receipt of the dollar amount loaned or paid by SuperPawn for the property. To transfer property in violation of the rights of the true owner is criminal. By signing, I assure SuperPawn that I am the true owner of the property described herein with the legal right to pledge or sell and that there is no security in the property by any other person. I further acknowledge receipt of a true copy of this contract.

Customer Signature

[Signature]

0-30 Days N/A thru 06/25/2016	31-60 Days N/A thru 07/25/2016	61-90 Days N/A thru 08/24/2016	FINANCIAL TERMS: FEES AND CHARGES. You agree to pay the following fees and charges associated with your loan: (1) an Origination Fee of \$5.00, which will be collected only once per loan on the first cash transaction (redemption, renewal, or extension); (2) Interest in an amount equal to 13% of the Amount Financed for each 30-day period the loan is outstanding and is fully earned on the first day of each such 30-day period; (3) a Late Fee of \$10.00, which will be charged only once per loan on the first cash transaction (redemption, renewal, or extension) after the initial Due Date; (4) a Deferral Fee of \$5.00, which will be charged for each extension executed by you after the initial Due Date; and (5) a Lost Ticket Fee of \$5.00, which will be charged to reproduce a duplicate pawn ticket. The term of this loan contract is 90 days. See the remainder of this contract for any additional information concerning nonpayment and default.
DATE DUE: N/A			
TICKET NUMBER: 482203			

The SuperPawn Promise to You:

- You'll be treated with respect.
- You'll receive the "lowest" loan amounts on your valuables.
- You will experience a clean, well-lighted and enjoyable store.

Simple Pawn & Finance

When you bring in a valuable, we input the information into our computerized evaluator called TOPS™.

TOPS™ knows what the item sold for now, what the current resale price is, and the fair loan value given its current condition.

Think of TOPS™ as the ultimate expert.

SUPERPAWN SPECIAL OFFER
(Nevada Customers)

At any time on or before your loan's current Due Date (the original or extended Due Date) you may enter into a new loan agreement that provides for a revised Due Date that will be 90 days from the renewal date by paying the earned interest charges, plus the \$5.00 Origination Fee (if such fee has not been previously paid). Loan renewals entered into after the current Due Date will be subject to a \$10.00 Late Fee (if such fee has not been previously paid) and additional interest charges.

OR:

At any time on or before your loan's current Due Date, you may extend your loan for an additional 90 days by paying 90 days' interest charges, plus the \$5.00 Origination Fee (if such fee has not been previously paid). Loan extensions entered into after the current Due Date will be subject to a \$10.00 Late Fee (if such fee has not been previously paid), plus the \$5.00 Deferral Fee.

Did You Know?

- We do Payday Loans
- We are the largest chain pawnshop company in the country.
- We sell graded and/or certified diamonds
- We provide expert jewelry repair
- We offer lowest-cost buybacks.

Mail-In Redemptions

Pawned Jewelry may be redeemed by mail. The cost of packing, shipping and insurance is \$25. If you wish to take advantage of this service, please contact your SuperPawn store for instructions.

Renew Your Loan

See the SUPERPAWN SPECIAL OFFER for details.

Extend Your Loan

See the SUPERPAWN SPECIAL OFFER for details.

Retain This Ticket

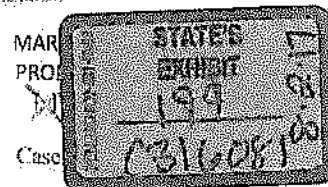
A pawn ticket will be needed to redeem collateral.

CUSTOMER PRIVACY NOTICE

Cash America may collect "nonpublic personal information" about you from the following sources:

- Information received from you on applications, pawn forms, loan documents, sales documents, or other forms, such as your name, address, social security number, assets and income;
- Information about your interactions with Cash America, its affiliates or others such as payment history and loan balances; and
- Information we receive from third parties, such as consumer reporting agencies and other lenders, regarding creditworthiness and credit history.

"Nonpublic personal information" is information we obtain in connection with providing you with financial services including, but not limited to, short term loans. Examples of nonpublic personal information include your name, social security number, payment history, and credit reports. Cash America does not disclose any nonpublic personal information about its pawn customers or former pawn customers to anyone except its affiliates for servicing purposes, or as permitted by law. Cash America restricts access to nonpublic personal information about its customers to only those employees that need that information to provide you with products or services. Cash America maintains physical, electronic, and procedural safeguards that comply with applicable law to guard your nonpublic personal information.



SUPERPAWN SPECIAL OFFER

SuperPawn offers extensions and renewals for your pawn loans.

(See back of pawn ticket for details.)

CashAmerica SUPER PAWN

© 2014 Cash America West, Inc. Nevada Pawn Form Ticket SL2014

PAWN CONTRACT: For and in consideration of the sum paid to me by SuperPawn, I, the undersigned, do hereby pledge to SuperPawn, and grant a security interest in, the property described herein, possession of which is delivered to SuperPawn as security and collateral for the amount loaned plus accrued interest and charges. If I fail to pay to SuperPawn the **AMOUNT FINANCED** plus **FINANCE CHARGES** within 90 days hereof, then I acknowledge that the property held as collateral shall be forfeited at SuperPawn's sole discretion, and an automatic transfer of ownership to SuperPawn may occur without process of law or foreclosure proceedings. In consideration of the sum paid to me, I relieve SuperPawn of liability for loss or damage to the property from fire, flood, simple negligence or any criminal conduct. In the event of liability on the part of SuperPawn for any loss or damage to the property, it is stipulated that damages shall be liquidated in the amount of the loan plus interest owed.

SALE CONTRACT: I agree to transfer and sell undisputed title to the property to SuperPawn for the amount specified herein. In exchange for the amount paid, I hereby relinquish all claims to recovery of the property.

FULL NAME AND ADDRESS OF BORROWER / SELLER OMARA D MC BRIDE 2134 CANYON CREEK CT NEWMAN, CA 95360	SEX F	DATE OF BIRTH 12/13/1994	HEIGHT 5'4	WEIGHT 120	EYES BLK	HAIR BLK	RACE B	SUPERPAWN EMPLOYEE 33474	SUPERPAWN LOCATION FOR THIS TRANSACTION: 5910 W. Lake Mead Las Vegas, NV 89108 (702) 438-2123
	IDENTIFICATION PRESENTED ID-CA-F2910400			TRANSACTION DATE / TIME 05/26/2016 14:50			PRIOR TRANSACTION NUMBER N/A		
				TRANSACTION TYPE PURCHASE			LOCATION CODE N/A		

DESCRIPTION OF PROPERTY - YOU ARE GIVING A SECURITY INTEREST IN THE FOLLOWING PROPERTY
**(1) PEND: CHARM; T/G: 12 KT.; APPRX 16.0 GRM; SQUARE DRAGON; GENDER
 MAN'S;**

AMOUNT FINANCED: The amount of cash given directly to you.	\$ 265.00
FINANCE CHARGE: The dollar amount the credit will cost you.	\$ N/A
TOTAL OF PAYMENTS: Amount required to redeem on due date.	\$ N/A
ANNUAL PERCENTAGE RATE: The cost of your credit as a yearly rate.	N/A%

My signature confirms that I have read and agree in all terms of the contract and that all information I have given is correct. I further acknowledge receipt of the dollar amount loaned or paid by SuperPawn for the property. To transfer property in violation of the rights of the true owner is criminal. By signing, I assure SuperPawn that I am the true owner of the property described herein with the legal right to pledge or sell and that there is no security in the property by any other person. I further acknowledge receipt of a true copy of this contract.

PAYMENT SCHEDULE: TOTAL OF PAYMENTS is due on the DUE DATE.
PREPAYMENT: If you pay off early, you will not be entitled to a refund of part of the FINANCE CHARGE.
SECURITY: The loan is secured by the personal property described above.
LATE FEE: Renewals, extensions or redemptions of your loan after the Due Date will be subject to a \$10 Late Fee, Deferral Fee (where applicable), plus additional interest charge.

Customer Signature: *X [Signature]*

0-30 Days N/A thru 06/25/2016	31-60 Days N/A thru 07/25/2016	61-90 Days N/A thru 08/24/2016	FINANCIAL TERMS: FEES AND CHARGES: You agree to pay the following fees and charges associated with your loan: (1) an Origination Fee of \$5.00, which will be collected only once per loan on the first cash transaction (redemption, renewal, or extension); (2) Interest in an amount equal to 13% of the Amount Financed for each 30-day period the loan is outstanding and is fully earned on the first day of each such 30-day period; (3) a Late Fee of \$10.00, which will be charged only once per loan on the first cash transaction (redemption, renewal, or extension) after the initial Due Date; (4) a Deferral Fee of \$5.00, which will be charged for each extension executed by you after the initial Due Date; and (5) a Lost Ticket Fee of \$5.00, which will be charged to reproduce a duplicate pawn ticket. The term of this loan contract is 90 days. See the remainder of this contract for any additional information concerning nonpayment and default.
DATE DUE: N/A			
TICKET NUMBER: 482204			

- **Payday Loan Promise to You**
- You will be treated with respect.
- You will receive the fastest loan amounts on your timeline.
- Maximize your time & clean, well lighted and organized store.

Here's How it Works:
Before you bring in a valuable, we input the information into our computerized evaluator called TOPS™.

TOPS™ knows what the item is for, what the current value is, and the fair item value given its current condition.

Think of TOPS™ as the ultimate expert.

SUPERPAWN SPECIAL OFFER

(Nevada Customers)

At any time on or before your loan's current Due Date (the original or extended Due Date) you may enter into a new loan agreement that provides for a revised Due Date that will be 30 days from the renewal date by paying the normal interest charges, plus the \$5.00 Origination Fee (if such fee has not been previously paid). Loan renewals entered into after the current Due Date will be subject to a \$10.00 Late Fee (if such fee has not been previously paid) and additional interest charges.

OR

At any time on or before your loan's current Due Date, you may extend your loan for an additional 30 days by paying 30 days interest charges, plus the \$5.00 Origination Fee (if such fee has not been previously paid). Loan extensions entered into after the current Due Date will be subject to a \$10.00 Late Fee (if such fee has not been previously paid), plus the \$5.00 Deferral Fee.

Did You Know?

- We do Payday loans.
- We are the largest chain pawnshop company in the country.
- We sell graded and/or certified diamonds.
- We provide expert jewelry repair.
- We offer interest-free layaways.

Mail-In Redemptions

Pawned Jewelry may be redeemed by mail. The cost of packing, shipping and insurance is \$25. If you wish to take advantage of this service, please contact your SuperPawn store for instructions.

Renew Your Loan

See the SUPERPAWN SPECIAL OFFER for details.

Extend Your Loan

See the SUPERPAWN SPECIAL OFFER for details.

Retain This Ticket

A pawn ticket will be needed to redeem collateral.

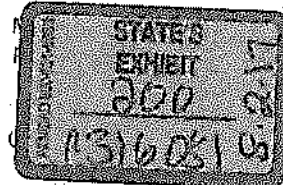
CASH AMERICA PRIVACY NOTICE

Cash America may collect "nonpublic personal information" about you from the following sources:

- information supplied from you on applications, pawn forms, loan documents, sales documents, or other forms, such as your name, address, social security number, assets and income;
- information about your transactions with Cash America, its affiliates or others such as payment history and loan balances; and
- information we receive from third parties, such as consumer reporting agencies and other lenders, regarding activities and credit history.

"Nonpublic personal information" is information we obtain in connection with providing you with financial services including, but not limited to, short term loans. Examples of nonpublic personal information include your name, social security number, payment history, and credit reports. Cash America does not disclose any nonpublic personal information about its pawn customers or former pawn customers to anyone except its affiliates for servicing purposes, or as permitted by law.

Cash America restricts access to nonpublic personal information about its customers to only those employees that need that information to provide you with products or services. Cash America maintains physical, electronic, and procedural safeguards that comply with applicable law to guard your nonpublic personal information.



SUPERPAWN SPECIAL OFFER
 SuperPawn offers extensions and renewals for your pawn loans.
 (See back of pawn ticket for details.)

CashAmerica
SUPER PAWN

© 2015 CashAmerica West, Inc. Nevada Pawn Ticket Form 001.01/15

PAWN CONTRACT: For and in consideration of the sum paid to me by SuperPawn, I, the undersigned, do hereby pledge to SuperPawn, and grant a security interest in, the property described herein, possession of which is delivered to SuperPawn as security and collateral for the amount loaned plus accrued interest and charges. If I fail to pay to SuperPawn the **AMOUNT FINANCED** plus **FINANCE CHARGES** within 90 days hereof, then I acknowledge that the property held as collateral shall be forfeited at SuperPawn's sole discretion, and an automatic transfer of ownership to SuperPawn may occur without process of law or foreclosure proceedings. In consideration of the sum paid to me, I relieve SuperPawn of liability for loss or damage to the property from fire, flood, simple negligence or any criminal conduct. In the event of liability on the part of SuperPawn for any loss or damage to the property, it is stipulated that damages shall be liquidated in the amount of the loan plus interest owed.

SALE CONTRACT: I agree to transfer and sell undisputed title to the property to SuperPawn for the amount specified herein. In exchange for the amount paid, I hereby relinquish all claims to recovery of the property.

FULL NAME AND ADDRESS OF BORROWER/SELLER OMARA D MCBRIDE 2134 CANYON CREEK CT NEWMAN, CA 95360	SEX F	DATE OF BIRTH 12/13/1994	HEIGHT 5'4	WEIGHT 120	EYES BLK	HAIR BKL	RACE B	SUPERPAWN EMPLOYEE 33474	SUPERPAWN LOCATION FOR THIS TRANSACTION: 5910 W. Lake Mead Las Vegas, NV 89108 (702) 438-2123
	IDENTIFICATION PRESENTED ID-CA-E2910400		EXPIRATION DATE / TIME 05/26/2016 14:51			PAST TRANSACTION NUMBER N/A		LOCATION CODE N/A	
TRANSACTION TYPE PURCHASE									

DESCRIPTION OF PROPERTY - YOU ARE GIVING A SECURITY INTEREST IN THE FOLLOWING PROPERTY:
 (1) PEND/CHARM; 1/2 G; 10 KT. APPROX 8-5 GRM; CROSS; GENDER N/A; 1/2 RND
 SHP; DIA-TEST POS STM; 4 5 PTS EA. 10; RND SHP; DIA-TEST POS STM; 0 2
 PTS EA.)

AMOUNT FINANCED: The amount of cash given directly to you.	\$ 115.00
FINANCE CHARGE: The dollar amount the credit will cost you.	\$ N/A
TOTAL OF PAYMENTS: Amount required to redeem on due date.	\$ N/A
ANNUAL PERCENTAGE RATE: The cost of your credit as a yearly rate.	N/A%

PAYMENT SCHEDULE: TOTAL OF PAYMENTS is due on the DUE DATE.
PREPAYMENT: If you pay off early, you will not be entitled to a refund of part of the FINANCE CHARGE.
SECURITY: The loan is secured by the personal property described above.
LATE FEE: Renewals, extensions or redemptions of your loan after the Due Date will be subject to a \$10 Late Fee, Deferral Fee (where applicable), plus additional interest charge.

My signature certifies that I have read and agree to all terms of the contract and that all information I have given is correct. I further acknowledge receipt of the dollar amount loaned or paid by SuperPawn for the property. To transfer property in violation of the rights of the true owner is criminal. By signing, I assure SuperPawn that I am the true owner of the property described herein with the legal right to pledge or sell and that there is no security in the property by any other person. I further acknowledge receipt of a true copy of this contract.

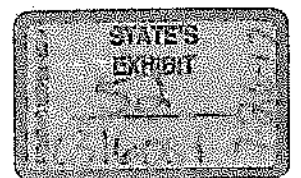
Customer Signature

X [Signature]

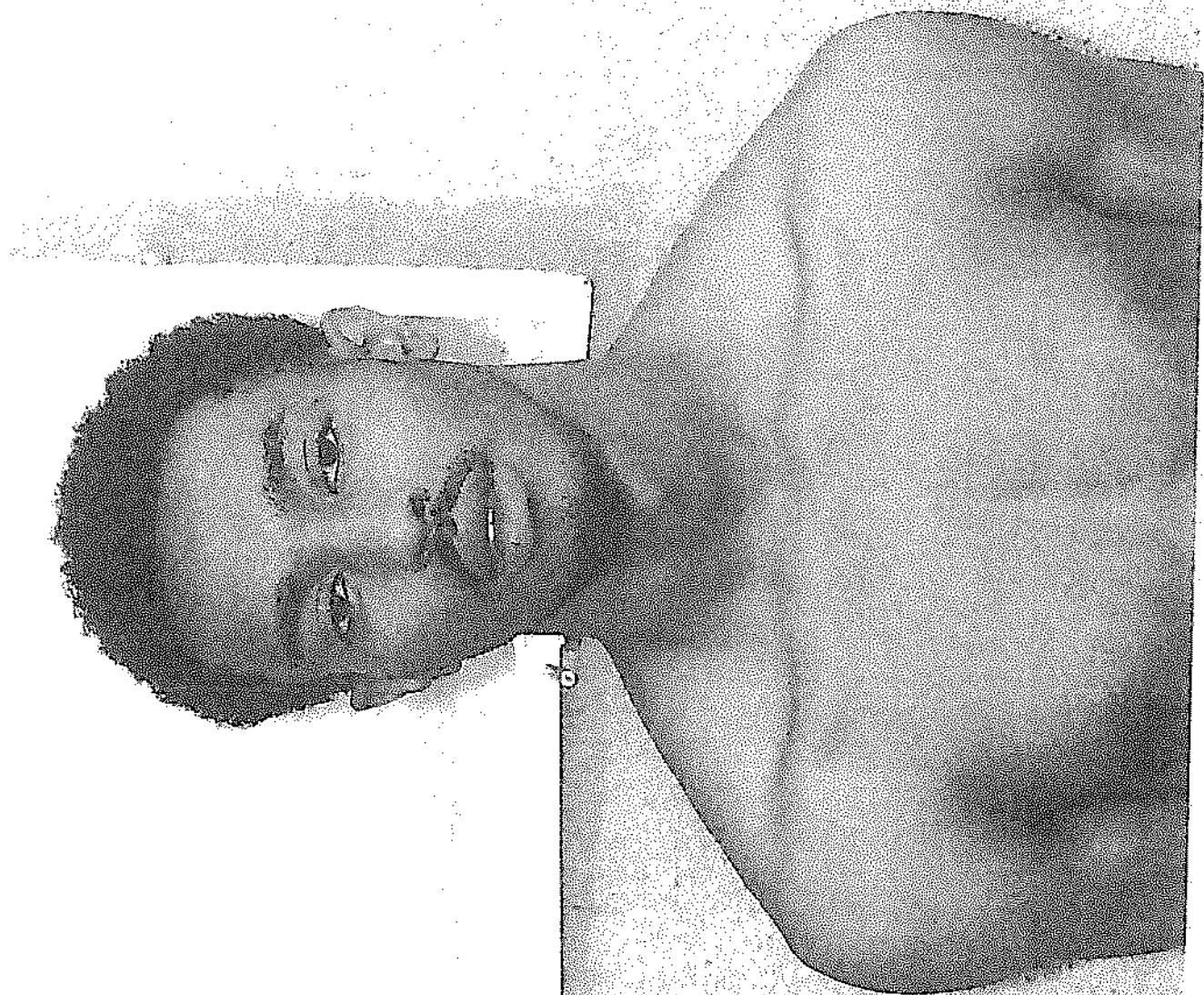
0-30 Days N/A thru 06/25/2016	31-60 Days N/A thru 07/25/2016	61-90 Days N/A thru 08/24/2016
--	---	---

DATE DUE: N/A	TICKET NUMBER: 482205
-------------------------	---------------------------------

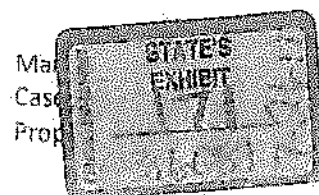
FINANCIAL TERMS, FEES AND CHARGES: You agree to pay the following fees and charges associated with your loan: (1) an Origination Fee of \$5.00, which will be collected only once per loan on the first cash transaction (redemption, renewal, or extension); (2) Interest in an amount equal to 13% of the Amount Financed for each 30-day period the loan is outstanding and is fully earned on the first day of each such 30-day period; (3) a Late Fee of \$10.00, which will be charged only once per loan on the first cash transaction (redemption, renewal, or extension) after the initial Due Date; (4) a Deferral Fee of \$5.00, which will be charged for each extension requested by you after the initial Due Date; and (5) a Lost Ticket Fee of \$5.00, which will be charged to reproduce a duplicate pawn ticket. The term of this loan contract is 90 days. See the remainder of this contract for any additional information concerning nonpayment and default.



3000



3001



12:00

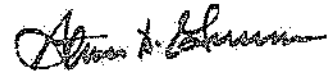
1

EIGHTH JUDICIAL DISTRICT COURT

Electronically Filed
07/14/2016 11:13:43 AM

2

CLARK COUNTY, NEVADA



CLERK OF THE COURT

3

4

12:00

5

THE STATE OF NEVADA,

)

6

Plaintiff,

)

7

vs.

)

GJ No. 16AGJ046X

8

KEANDRE VALENTINE,

)

DC No. C316081

9

Defendant.

)

)

12:00

10

11

12

Taken at Las Vegas, Nevada

13

Tuesday, June 28, 2016

14

8:50 a.m.

12:00

15

16

17

18

REPORTER'S TRANSCRIPT OF PROCEEDINGS

19

12:00

20

21

22

23

24

12:00

25

Reported by: Danette L. Antonacci, C.C.R. No. 222

08:51 1 THE FOREPERSON: Good morning, sir.

2 THE WITNESS: Hello.

3 THE FOREPERSON: Please raise your right
4 hand.

08:51 5 You do solemnly swear the testimony you are
6 about to give upon the investigation now pending before
7 this Grand Jury shall be the truth, the whole truth, and
8 nothing but the truth, so help you God?

9 THE WITNESS: Yeah.

08:51 10 THE FOREPERSON: Thank you. Please be
11 seated at the microphone.

12 THE WITNESS: Okay.

13 THE FOREPERSON: You are advised that you
14 are here today to give testimony in the investigation
08:51 15 pertaining to the offenses

16

17

18

19

08:52 20 involving Keandre Valentine.

21 Do you understand this advisement?

22 THE WITNESS: Yes.

23 THE FOREPERSON: Could you please state
24 your first and last name and spell both for the record.

08:52 25 THE WITNESS: Okay. Marvir Bass.

08:52 1 M-A-R-V-I-N, B-A-S-S.

2 THE FOREPERSON: Thank you so much, sir.

3 THE WITNESS: Uh-huh.

4 MR. DICKERSON: May I proceed?

08:52 5 THE FOREPERSON: Yes, sir.

6 MR. DICKERSON: Thank you.

7 MARVIN BASS,

8 having been first duly sworn by the Foreperson of the

9 Grand Jury to testify to the truth, the whole truth,

08:52 10 and nothing but the truth, testified as follows:

11

12 EXAMINATION

13

14 BY MR. DICKERSON:

08:52 15 Q. Mr. Bass, drawing your attention to May 26,
16 2016 at approximately 12:58 p.m., where were you?

17 A. I was at the Rancho Discount Mall.

18 Q. Is that located at 2901 West Washington in
19 Las Vegas, Clark County, Nevada?

08:52 20 A. Yes.

21 Q. At that time were you sitting in your
22 vehicle?

23 A. Yes.

24 Q. What happened as you were sitting in your

08:52 25 vehicle?

08:52 1 A. Well, when I was sitting in my vehicle a
2 car pulled up behind me but facing Rancho Street but not
3 in the parking lane, he's parked in like the middle of
4 the street.

08:53 5 Q. What did that car look like?

6 A. It was white, four door, and I think it was
7 like a Kia. It looked like one.

8 Q. It looked like a Kia style vehicle?

9 A. Yeah.

08:53 10 Q. Was it four door?

11 A. Four door.

12 Q. White in color?

13 A. Right.

14 Q. Newer model?

08:53 15 A. Yeah.

16 Q. Could you tell whether it had a license
17 plate or not?

18 A. No, it didn't. It had like a cardboard
19 dealership, red and white.

08:53 20 Q. Like a dealer tag?

21 A. Yeah.

22 Q. That car parked about 20 feet away. At
23 that point in time did you think you knew the person in
24 the vehicle?

08:53 25 A. Well, when he got out the car he started

08:53 1 approaching me while I was sitting in my car and it
2 looked like I knew him, but as he got closer, no, I
3 didn't recognize him.

4 Q. It was by the way he was approaching you
08:53 5 that you thought you knew him?

6 A. Yeah.

7 Q. Because you thought you knew him you rolled
8 down your window?

9 A. Yeah.

08:54 10 Q. What happened?

11 A. Well, he stared at me and he said, he
12 hollered out "this is a robbery, give me your gold" and
13 with his right arm he stuck his arm through the window,
14 snatched my gold off my neck at gun point.

08:54 15 Q. What was the gold that you had on your
16 neck?

17 A. It was two gold chains with two charms.

18 Q. At this point in time the gun was pointed
19 at you?

08:54 20 A. Yeah.

21 Q. What did he do after that?

22 A. Then he asked me for my wallet, so I gave
23 it to him.

24 Q. What did you have in your wallet?

08:54 25 A. Credit cards, all my ID. No money at all.

08:54 1 Q. The gun, how was he holding the gun?

2 A. He was holding it with his left arm, left
3 hand, pointed at me while he was snatching my gold off
4 my neck.

08:54 5 Q. When he was taking your gold --

6 A. Yeah.

7 Q. -- he said something specific, didn't he?

8 A. Well, he said, he said "if you don't give
9 it up" something like that "I'm going to shoot your big

08:54 10 ass."

11 Q. Was the quote that you told the police
12 officers at the time "give me your gold; give me your
13 wallet or I'll shoot your fat ass"?

14 A. Yeah, that's what he said.

08:55 15 Q. And then he took your gold?

16 A. Well, he took that first.

17 Q. Then he took your wallet?

18 A. Yeah.

19 Q. The gun, what did that look like?

08:55 20 A. It was black. It looked like a Glock.

21 Q. What did he do after he took your wallet?

22 A. Then he asked me for my cell phone and he
23 just started searching my pockets but he couldn't find
24 it, so then he asked me to open up my glove compartment,
08:55 25 so I did, there wasn't nothing in there.

08:55 1 Q. Did he reach inside your vehicle?
2 A. Yeah. Well, he -- yeah.
3 Q. So you're sitting in your vehicle, he's
4 standing outside?
08:55 5 A. Yes.
6 Q. And he reaches in?
7 A. Uh-huh.
8 Q. To pat you down?
9 A. Yeah.
08:55 10 Q. And did he also reach into your glove box?
11 A. No, he didn't reach. I just opened it up
12 and he looked.
13 Q. When he reached into your vehicle was he
14 holding the firearm?
08:55 15 A. Yes.
16 Q. Still in his left hand?
17 A. Still in his left hand.
18 Q. This individual, what did he look like?
19 A. Black male, say around about 160 some
08:56 20 pounds, 5'10", 5'11", medium Afro.
21 Q. So after --
22 A. Dark colored clothes and stuff like that.
23 Q. After this point in time does he flee the
24 scene?
08:56 25 A. Yeah.

08:56 1 Q. What do you do?
2 A. Well, first he said "hold your head down
3 till I leave." So I did. Then he got --
4 Q. You put your head down?
08:56 5 A. Yeah.
6 Q. Towards the steering wheel?
7 A. Hub?
8 Q. Towards the steering wheel?
9 A. Yeah, I just held it down. Then when I
08:56 10 lifted it up that's when he jumped in his car and
11 speeded out the parking lot.
12 Q. Into that same newer model white four door
13 vehicle?
14 A. Right, yes.
08:56 15 Q. Did you follow him?
16 A. Yeah, I had called 911 and talking to the
17 operator while I followed him.
18 Q. Did you end up losing sight of him?
19 A. Yeah.
08:56 20 Q. Did the police meet up with you?
21 A. Yeah.
22 Q. That same day?
23 A. Same day.
24 Q. They took a report at that time?
08:56 25 A. Yeah.

08:56 1 Q. Did a couple days later the police contact
2 you?

3 A. Yeah.

4 Q. And that was to do a photo line-up?

08:56 5 A. Yeah.

6 Q. And you in fact completed a photo line-up
7 with the police; is that correct?

8 A. Yeah.

9 Q. I'm going to show you right now what's been
08:57 10 marked as Grand Jury Exhibit 6. Do you recognize that?

11 A. Yeah.

12 Q. Is that the photo line-up instructions and
13 statement that you wrote?

14 A. Uh-huh.

08:57 15 Q. And Grand Jury Exhibit 7, do you recognize
16 that?

17 A. Yeah.

18 Q. Is that the photo line-up that you
19 completed?

08:57 20 A. Yeah.

21 Q. Showing the members of the Grand Jury first
22 Grand Jury Exhibit Number 6. This is the Grand Jury
23 instructions and statement. Those instructions on the
24 photo line-up witness instructions form, those were read
08:57 25 to you?

08:57 1 A. Yeah.

2 Q. And you read them yourself?

3 A. Yeah.

4 Q. Is this your signature right here under the

08:57 5 instructions?

6 A. Yeah.

7 Q. Stating that you understood those

8 instructions?

9 A. Uh-huh.

08:57 10 Q. Then looking at Grand Jury Exhibit 7, this

11 is the photo line-up?

12 A. Yeah.

13 Q. You marked photo number 3?

14 A. Uh-huh.

08:57 15 Q. Circling it?

16 A. Uh-huh.

17 Q. Are those your initials under photo

18 number 2?

19 A. Yes.

08:57 20 Q. And then did you write this statement on

21 the photo line-up witness instructions form?

22 A. Yes.

23 Q. That statement is "I'm very sure the

24 suspect I identified in the photo line-up is the same as

08:58 25 him, 100 percent. He was very close to me when he

08:58 1 robbed me at gunpoint."

2 A. Uh-huh.

3 Q. That's your statement?

4 A. That's my statement.

08:58 5 Q. That's your handwriting?

6 A. That's my handwriting.

7 Q. Is this your signature underneath your

8 statement?

9 A. Yes.

08:58 10 Q. That individual that you identified in this

11 photo line-up, that's the man that robbed you at the

12 Rancho Discount Mall?

13 A. Yes.

14 Q. And that Rancho Discount Mall is located in

08:58 15 Las Vegas, Clark County, Nevada?

16 A. Yeah.

17 MR. DICKERSON: I have no further questions

18 for this witness. Do any members of the Grand Jury have

19 questions for him?

08:58 20 THE FOREPERSON: Sir, there are no further

21 questions at this time.

22 Just needed to let you know that, by law,

23 these proceedings are secret and you are prohibited from

24 disclosing to anyone anything that has transpired before

08:59 25 us, including evidence and statements presented to the

08:59 1 Grand Jury, any event occurring or statement made in the
2 presence of the Grand Jury, and information obtained by
3 the Grand Jury.

4 Failure to comply with this admonition is a
08:59 5 gross misdemeanor punishable up to 364 days in the Clark
6 County Detention Center and a \$2,000 fine. In addition,
7 you may be held in contempt of court punishable by an
8 additional \$500 fine and 25 days in the Clark County
9 Detention Center.

08:59 10 Do you understand this admonition?

11 THE WITNESS: I understand.

12 THE FOREPERSON: Thank you so much. You
13 are excused.

14 THE WITNESS: Thank you.

09:59 15 MS. LEXIS: State's next witness is Darrell
16 Faulkner.

17 THE FOREPERSON: Good morning, sir. Please
18 raise your right hand.

19 You do solemnly swear the testimony you are
09:00 20 about to give upon the investigation now pending before
21 this Grand Jury shall be the truth, the whole truth, and
22 nothing but the truth, so help you God?

23 THE WITNESS: I do.

24 THE FOREPERSON: Thank you so much. Please
09:00 25 be seated.

EIGHTH JUDICIAL DISTRICT COURT

Electronically Filed
07/14/2016 11:13:43 AM

CLARK COUNTY, NEVADA

Alvin D. Harrison

CLERK OF THE COURT

THE STATE OF NEVADA,

Plaintiff,

vs.

KEANDRE VALENTINE,

Defendant..

GJ No. 16AGJ046X

DC No. C316081

Taken at Las Vegas, Nevada

Tuesday, June 28, 2016

8:50 a.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Reported by: Danette L. Antonacci, C.C.R. No. 222

Mark
Case
Prop



3015

09:07 1 J-O-R-D-A-N, A-L-E-X-A-N-D-E-R.

2 THE FOREPERSON: Thank you so much.

3 THE WITNESS: No problem.

4 JORDAN ALEXANDER,

09:07 5 having been first duly sworn by the Foreperson of the
6 Grand Jury to testify to the truth, the whole truth,
7 and nothing but the truth, testified as follows:

8

9

EXAMINATION

09:07 10

11 BY MR. DICKERSON:

12 Q. Mr. Alexander, drawing your attention to
13 May 28, 2016 at 7:01 a.m. approximately, were you in
14 your driveway of your home?

09:08 15 A. No, sir, I was on the side of the street
16 which is right next to the driveway so.

17 Q. So right outside of 1508 Robin Street?

18 A. Yes, sir.

19 Q. And that address is located here in Las

09:08 20 Vegas Clark County, Nevada?

21 A. Yes, sir.

22 Q. What were you doing?

23 A. I was loading my fiancée's purses and the
24 car seat into my car.

09:08 25 Q. What happened as you were loading these

09:08 1 items into the vehicle?

2 A. When I put the car seat, no, the purses
3 inside of the car, a white Mazda pulled up behind my car
4 which is on the side of the street, and I was on the
09:08 5 outside on the driver's side of my car which is closest
6 to the street, and then the car pulled up behind it.
7 When it pulled up behind it I walked around my car which
8 was in front of the Mazda and I walked to the passenger
9 side of my car to put in the car seat.

09:08 10 Q. That Mazda, how close did it pull up to
11 you?

12 A. It probably left about three or four feet
13 behind my car.

14 Q. Was it white in color?

09:08 15 A. Yes, sir.

16 Q. Newer model?

17 A. Yes, sir. Around 2013, 2014 I believe.

18 Q. Four door?

19 A. Yes, sir.

09:09 20 Q. I'm showing you what has been marked as
21 Grand Jury Exhibit 8. Do you recognize this?

22 A. Yes, sir.

23 Q. What is that?

24 A. That is a Mazda 3.

09:09 25 Q. Is this the vehicle that you saw that day?

09:09 1 A. Yes, sir, for sure. Dark tinted windows.

2 Q. Showing the members of the Grand Jury Grand
3 Jury Exhibit 8.

4 Once again that's the vehicle that you saw
09:09 5 pull up behind you in front of your address?

6 A. Yes, sir.

7 Q. As that vehicle pulled up, what happened?

8 A. Well, once I went to the passenger side of
9 my car to the back to put the car seat, I, after I put,

09:09 10 buckled in the car seat, I went to turn around and when
11 I turned around he was right there with a gun in my
12 face.

13 Q. You say he. What does this individual look
14 like?

09:09 15 A. It was a tall black male with kind of a
16 tall Afro, not too big but an Afro, and he had on all
17 black.

18 Q. Was he skinny?

19 A. Yes, sir, really slim.

09:10 20 Q. About in his twenties, is that what you
21 told police officers?

22 A. Yeah, I'm going to say.

23 Q. What happened as he puts his gun in your
24 face?

09:10 25 A. He had it close to his body and he just

09:08 1 items into the vehicle?

2 A. When I put the car seat, no, the purses
3 inside of the car, a white Mazda pulled up behind my car
4 which is on the side of the street, and I was on the

09:08 5 outside on the driver's side of my car which is closest
6 to the street, and then the car pulled up behind it.
7 When it pulled up behind it I walked around my car which
8 was in front of the Mazda and I walked to the passenger
9 side of my car to put in the car seat.

09:08 10 Q. That Mazda, how close did it pull up to
11 you?

12 A. It probably left about three or four feet
13 behind my car.

14 Q. Was it white in color?

09:08 15 A. Yes, sir.

16 Q. Newer model?

17 A. Yes, sir. Around 2013, 2014 I believe.

18 Q. Four door?

19 A. Yes, sir.

09:09 20 Q. I'm showing you what has been marked as
21 Grand Jury Exhibit 8. Do you recognize this?

22 A. Yes, sir.

23 Q. What is that?

24 A. That is a Mazda 3.

09:09 25 Q. Is this the vehicle that you saw that day?

09:09 1 A. Yes, sir, for sure. Dark tinted windows.

2 Q. Showing the members of the Grand Jury Grand
3 Jury Exhibit 8.

4 Once again that's the vehicle that you saw
09:09 5 pull up behind you in front of your address?

6 A. Yes, sir.

7 Q. As that vehicle pulled up, what happened?

8 A. Well, once I went to the passenger side of
9 my car to the back to put the car seat, I, after I put,
09:09 10 buckled in the car seat, I went to turn around and when
11 I turned around he was right there with a gun in my
12 face.

13 Q. You say he. What does this individual look
14 like?

09:09 15 A. It was a tall black male with kind of a
16 tall Afro, not too big but an Afro, and he had on all
17 black.

18 Q. Was he skinny?

19 A. Yes, sir, really slim.

09:10 20 Q. About in his twenties, is that what you
21 told police officers?

22 A. Yeah, I'm going to say.

23 Q. What happened as he puts his gun in your
24 face?

09:10 25 A. He had it close to his body and he just

09:10 1 told me to give him everything I had and I told him I
2 didn't have anything.

3 Q. And the way that he had it close to his
4 body, what was going on there?

09:10 5 A. He had it in his left hand but he had it
6 aimed at me but angled to where nobody else could see
7 like even if somebody drove by.

8 Q. Did he tell you anything?

9 A. He told me to be calm, to just give him
09:10 10 everything that I had.

11 Q. Did he say anything specifically that he
12 wanted?

13 A. He asked for purses, the purses that I took
14 out to my car, he asked for a phone, then he asked for
09:10 15 my wallet and money.

16 Q. Did you in fact give him your wallet?

17 A. Yes, sir.

18 Q. What was located in your wallet?

19 A. My ID, my social security card, my health
09:10 20 card and my blood type card.

21 Q. Did you also have a Wells Fargo Visa debit
22 card?

23 A. Yes, sir.

24 Q. Ending in last four numbers 8220?

09:11 25 A. Yes, sir.

09:11 1 Q. And you had your Nevada ID?

2 A. Yes, sir.

3 Q. I'm going to show you just briefly Grand
4 Jury Exhibit 18. Do you recognize that blue card

09:11 5 depicted in Grand Jury Exhibit 18?

6 A. Yes, sir.

7 Q. What is that?

8 A. That is my debit card.

9 Q. Is that the one that was in your wallet?

09:11 10 A. Yes, sir.

11 Q. Showing the members of the Grand Jury Grand
12 Jury Exhibit Number 18.

13 Also showing you Grand Jury Exhibit 17. Do
14 you recognize this ID in Grand Jury Exhibit 17?

09:11 15 A. Yes, sir, that is my ID.

16 Q. Is that the ID that you had in your wallet?

17 A. Yes, sir.

18 Q. Showing the members of the Grand Jury Grand
19 Jury Exhibit Number 17.

09:11 20 Now did he take those items that I just
21 showed you?

22 A. Yes, sir. He -- well, actually I handed
23 him my wallet so he got all of that out of the wallet.

24 Q. So that was in your wallet?

09:12 25 A. Yes.

09:12 1 Q. It went with him when he took the wallet?

2 A. Yes, sir.

3 Q. Did he, this individual that was robbing
4 you that day, or anybody else, have consent to have that

09:12 5 Visa debit card?

6 A. No, sir. No consent on that one.

7 Q. So after he gets these items from you, what
8 does he do?

9 A. He asked me for my keys to the car but I
09:12 10 told him that they weren't the right keys. So he walked
11 up kind of close to the car and he just peeked inside
12 and then he just walked off to his car.

13 Q. That same Mazda?

14 A. Yes, sir.

09:12 15 Q. Does he leave in that Mazda?

16 A. Yes, sir, he walked to the driver's side,
17 got in the car and then he just threw it in drive and
18 just drove off.

19 Q. And what do you do?

09:12 20 A. As soon as he passed me I ran into the
21 house and I told my mom that I got robbed at gunpoint so
22 I was going to go try to follow to see where he went and
23 she said hold on, let me get some stuff real quick, and
24 I'm like I'm going to follow him. So she came out
09:13 25 behind, me we made a right off of Robin and went down

09:13 1 Vegas and we seen a police officer's car and got their
2 attention and let them know what happened from there.

3 Q. You told the police right then?

4 A. Yes, sir.

09:13 5 Q. That's when the police became involved?

6 A. Yes, sir.

7 Q. Later that day, probably less than two
8 hours later, were you taken to J Street?

9 A. Yes, sir. On J Street and Owens, close to

09:13 10 Owens, yes, sir.

11 Q. At J Street were you asked to see whether a
12 certain individual was involved in this event?

13 A. Yes, sir. I went to go see the person who
14 robbed me actually.

09:13 15 Q. Did you identify somebody?

16 A. Yes, sir.

17 Q. That individual was a black male?

18 A. Yes, sir.

19 Q. Wearing no shirt --

09:13 20 A. No shirt.

21 Q. -- at the time you saw him.

22 I'm going to show you Grand Jury Exhibit 5.

23 Do you recognize that?

24 A. Yes, sir.

09:13 25 Q. Is that the individual that robbed you?

09:13 1 A. Yes, sir, that is the male.

2 Q. Is that how he looked when you identified
3 him on J Street?

4 A. Yes, sir.

09:13 5 Q. And Grand Jury Exhibit 6, same thing? Or,
6 I'm sorry, Grand Jury Exhibit 4.

7 A. This is a better picture here.

8 Q. Is that a closeup of his face?

9 A. Yes, sir.

09:14 10 Q. Is that the way he looked when you
11 identified him?

12 A. Yes, sir.

13 Q. Showing the members of the Grand Jury Grand
14 Jury Exhibit 5.

09:14 15 That's the male who robbed you?

16 A. Yes, sir.

17 Q. Grand Jury Exhibit 6, same thing, that's
18 just a closeup of his face; is that correct?

19 Is that right?

09:14 20 A. Yes, sir.

21 MR. DICKERSON: Ladies and gentlemen, I
22 have no further questions for this witness. Do you guys
23 have any questions?

24 THE FOREPERSON: There are no further

09:14 25 questions by the Grand Jury at this time.

09:14 1 Sir, just needed to let you know that by
2 law, these proceedings are secret and you are prohibited
3 from disclosing to anyone anything that has transpired
4 before us, including evidence and statements presented
09:14 5 to the Grand Jury, any event occurring or statement made
6 in the presence of the Grand Jury, and information
7 obtained by the Grand Jury.

8 Failure to comply with this admonition is a
9 gross misdemeanor punishable up to 364 days in the Clark
09:14 10 County Detention Center and a \$2,000 fine. In addition,
11 you may be held in contempt of court punishable by an
12 additional \$500 fine and 25 days in the Clark County
13 Detention Center.

14 Do you understand this admonition?

09:15 15 THE WITNESS: Yes, ma'am.

16 THE FOREPERSON: Thank you so much. You're
17 excused.

18 MS. LEXIS: State's next witness is
19 Santiago Garcia.

09:15 20 THE FOREPERSON: Good morning.

21 THE WITNESS: Good morning.

22 THE INTERPRETER: I am the interpreter.

23 THE FOREPERSON: Could you please state
24 your first and last name.

09:15 25 THE INTERPRETER: Richard Evans, E-V-A-N-S.

Ma
Cas
Pro



09:17 1 THE WITNESS: S-A-N-T-I-A-G-O, Santiago,
2 G-A-R-C-I-A.

3 THE FOREPERSON: Thank you so much.

4 SANTIAGO GARCIA,

09:17 5 having been first duly sworn by the Foreperson of the
6 Grand Jury to testify to the truth, the whole truth,
7 and nothing but the truth, testified as follows:

8

9

EXAMINATION

09:17 10

11 BY MR. DICKERSON:

12 Q. Mr. Garcia, drawing your attention to May
13 28, 2016 at approximately 7:08 a.m. Were you working as
14 a landscaper at 1312 Nye Street located in Las Vegas,
09:17 15 Clark County, Nevada?

16 A. Yes.

17 Q. As you were working as a landscaper, what
18 were you doing?

19 A. We were trimming tree.

09:18 20 Q. When you say we, are you referring to
21 another individual that you were working with?

22 A. Yes. I don't know if I can say his name.

23 Q. Is that individual Juan Carlos
24 Campos-Torres?

09:18 25 A. Yes.

09:17 1 THE WITNESS: S-A-N-T-I-A-G-O, Santiago,
2 G-A-R-C-I-A.

3 THE FOREPERSON: Thank you so much.

4 SANTIAGO GARCIA,

09:17 5 having been first duly sworn by the Foreperson of the
6 Grand Jury to testify to the truth, the whole truth,
7 and nothing but the truth, testified as follows:

8
9 EXAMINATION

09:17 10
11 BY MR. DICKERSON:

12 Q. Mr. Garcia, drawing your attention to May
13 28, 2016 at approximately 7:08 a.m. Were you working as
14 a landscaper at 1312 Nye Street located in Las Vegas,
09:17 15 Clark County, Nevada?

16 A. Yes.

17 Q. As you were working as a landscaper, what
18 were you doing?

19 A. We were trimming tree.

09:18 20 Q. When you say we, are you referring to
21 another individual that you were working with?

22 A. Yes. I don't know if I can say his name.

23 Q. Is that individual Juan Carlos
24 Campos-Torres?

09:18 25 A. Yes.

09:18 1 Q. As you guys are trimming this tree, where
2 are you?

3 A. I was up in the ladder.

4 Q. And where is Juan Carlos?

09:18 5 A. On top of the roof.

6 Q. What happens as you guys are trimming this
7 tree?

8 A. When I was on top of the ladder I saw a
9 white car go by and park at the third house.

09:19 10 Q. The white car?

11 A. Yes.

12 Q. What did it look like?

13 A. Okay. I thought that it was a family
14 member of the owner of the house because I never saw a
09:19 15 weapon. He yelled but he was going towards the inside.

16 Q. The white car, was it a newer model?

17 A. Yes.

18 Q. Four door?

19 A. Uh-huh.

09:19 20 Q. Did it have a license plate?

21 A. No.

22 Q. The individual that got out of that
23 vehicle, what did he look like?

24 A. About 6 feet more or less in height. He
09:20 25 was completely in black. There's a question about the

09:20 1 hair, I don't know how to explain it. Here he had the
2 hair short and here it was kind of long, big.

3 Q. So he had some hair on top of his head?

4 A. Yes.

09:20 5 Q. Was it curly?

6 A. Yes. He was color black.

7 Q. Are you saying that he was a black male?

8 A. Yes.

9 Q. Was his hair also black?

09:20 10 A. Yes.

11 Q. As you see him approaching the house, do
12 you think that he may be familiar with the residence?

13 A. Yes, I thought he was a relative because
14 the people that lived in the house are from the same
09:21 15 color.

16 Q. Now this individual comes up to you?

17 A. First I saw when he pulled the gun and
18 pointed it at my worker. I was up in the ladder, he was
19 on the roof, we were at the same level.

09:21 20 Q. And when you're talking about your worker,
21 that's Juan Carlos?

22 A. Yes.

23 Q. So this individual points a gun at Juan
24 Carlos?

09:22 25 A. Yes.

09:22 1 Q. And does he say anything?

2 A. Yes, he told to get down. Carlos, what
3 Carlos did, he got scared and he jumped back. So the
4 guy never saw him again. So then he pointed the gun at
09:22 5 me and told me to get down.

6 Q. He points the gun at you and tells you to
7 get down while Juan Carlos is hiding on the roof?

8 A. Yes, I never saw Juan Carlos.

9 Q. After that point?

09:23 10 A. I didn't see him because he told me to get
11 down and turn off the trimmer that I was using to trim
12 the tree.

13 Q. The black male adult with the gun told you
14 to get off the ladder and drop the trimmer?

09:23 15 A. Yes.

16 Q. Did he order you to give him anything?

17 A. Yes, he said he wanted my money, everything
18 that I had in my pockets.

19 Q. What did you give him?

09:23 20 A. I had my keys, I told him I didn't have any
21 money which was a lie, I had my wallet in my back but I
22 just gave him my cash which I believe I had \$20.

23 Q. Did you also give him a cell phone?

24 A. Yes, he asked me to give him my phone as

09:24 25 well.

09:24 1 Q. The cash that you had, that was US
2 currency?

3 A. Yes, it were dollars.

4 Q. And how much was it?

09:24 5 A. I thought that I had \$20 but I pay my
6 workers on that same day so I had a bundle of about \$500
7 and I realized then afterwards that when I gave him
8 thinking it was \$20 I gave him everything.

9 Q. So you realized after the fact that you in
09:25 10 fact gave him more than \$20.

11 A. Yes. The day before I take out the money
12 so I can pay my workers.

13 Q. Okay. At this point in time did he have
14 the gun on you?

09:25 15 A. Yes, he had it against my chest.

16 Q. The gun was pressed against your chest?

17 A. Yes.

18 Q. What did he do after he took your cell
19 phone and that cash?

09:25 20 A. He went backwards always pointing the gun
21 at me and so did I. I started to go back to try to hide
22 behind the wall from the house.

23 Q. Did that male flee in that same white
24 vehicle that you saw?

09:26 25 A. Yes.

09:26 1 Q. Did you end up having the homeowner of the
2 home that you were working at call the police?

3 A. Yes, because that moment I knocked at the
4 door, came out, I explained everything, so they called
09:26 5 the police.

6 Q. Did you tell 911 that the individual was
7 wearing a black shirt?

8 A. Yes, he was completely black. I explained
9 that.

09:26 10 Q. And you said that he was driving a white
11 vehicle with no plates?

12 A. Yes. The only thing I noticed was a black
13 paper on the license plate with some name in blue color.

14 Q. Did officers later that day take you to the
09:27 15 area of 1701 J Street to see if you could identify a
16 vehicle?

17 A. Yes, but they first took me to show me a
18 person they had, if it was the same guy, but no, it
19 wasn't the same person.

09:27 20 Q. First we're going to talk about the
21 vehicle.

22 A. Okay.

23 Q. Grand Jury Exhibit 8. Do you recognize
24 that?

09:27 25 A. Yes, that's the car.

09:27 1 Q. Okay. This is the vehicle?
2 A. Yes.
3 Q. I'm going to show you Grand Jury Exhibit 5
4 and 4. Do you recognize those?

09:28 5 A. Yes, it's the same person.

6 Q. That's the person who robbed you?

7 A. Yes.

8 Q. Okay. You said that first before showing
9 you the vehicle they showed you another individual?

09:28 10 A. They showed me another person almost at the
11 same street.

12 Q. That wasn't the individual depicted in
13 Grand Jury Exhibit 4 and 5, right?

14 A. In the picture? No, it wasn't that.

09:28 15 Q. Okay. Grand Jury Exhibit 8 right here,
16 this is the vehicle that you saw?

17 A. Let me say. When they showed me the first
18 person, the officer said I'm going to show you now a
19 vehicle, see if that's the vehicle.

09:29 20 Q. And this was the vehicle that you saw?

21 A. Yes, that's the vehicle they showed me
22 there, and yes, it was the vehicle.

23 Q. That's the vehicle that the person who
24 robbed you was driving?

09:29 25 A. Car was parked in the parking lot. We

09:29 1 didn't see a person driving.

2 Q. Right. But this is the same vehicle that
3 you saw pull up at the house that you were working at?

4 A. Yes, it's the same vehicle.

09:29 5 Q. The same vehicle that the person who robbed
6 you stepped out of?

7 A. Yes.

8 Q. And fled in?

9 A. Yes.

09:29 10 Q. Okay. Later on you were brought back to
11 that J Street area; isn't that correct?

12 A. Yes.

13 Q. And that's when you were asked to identify
14 another individual?

09:30 15 A. First they took me to recognize the car,
16 then they came back to my work and took me to recognize
17 another person and that was the person.

18 Q. Okay. And this occurred the same day that
19 you were robbed?

09:30 20 A. Yes.

21 Q. And now I'm showing the Grand Jury Grand
22 Jury Exhibit 5. Is this how the individual looked when
23 you identified him?

24 A. Yes.

9 09:30 25 Q. And who is this individual?

09:32 1 have no further questions for this witness. Do any of
2 you have any questions for him?

3 THE FOREPERSON: If there are no further
4 questions by the Grand Jury at this time.

09:32 5 Sir, by law, these proceedings are secret.
6 and you are prohibited from disclosing to anyone
7 anything that has transpired before us, including
8 evidence and statements presented to the Grand Jury, any
9 event occurring or statement made in the presence of the
09:32 10 Grand Jury, and information obtained by the Grand Jury.

11 Failure to comply with this admonition is a
12 gross misdemeanor punishable up to 364 days in the Clark
13 County Detention Center and a \$2,000 fine. In addition,
14 you may be held in contempt of court punishable by an
09:32 15 additional \$500 fine and 25 days in the Clark County
16 Detention Center.

17 Do you understand this admonition?

18 THE WITNESS: Yes.

19 THE FOREPERSON: Thank you so much. You're

09:33 20 excused.

21 THE WITNESS: Can I ask a question?

22 MR. DICKERSON: No.

23 MS. LEXIS: Ask Mr. Dickerson outside the
24 presence.

09:33 25 THE WITNESS: Thank you.

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

Electronically Filed
07/14/2016 11:13:43 AM

Alvin D. Lohman

CLERK OF THE COURT

THE STATE OF NEVADA,

Plaintiff,

vs.

KEANDRE VALENTINE,

Defendant.

GJ No. 16AGJ046X

DC No. C316081

Taken at Las Vegas, Nevada

Tuesday, June 28, 2016

8:50 a.m.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Reported by: Danette L. Antonacci, C.C.R. No. 222



09:47 1 You do solemnly swear the testimony you are
2 about to give upon the investigation now pending before
3 this Grand Jury shall be the truth, the whole truth, and
4 nothing but the truth, so help you God?

09:47 5 THE WITNESS: Yes, I accept.

6 THE FOREPERSON: Please have a seat. Thank
7 you.

8 You are advised that you are here today to
9 give testimony in the investigation pertaining to the
09:47 10 offenses of robbery with use of a deadly weapon,
11 burglary while in possession of a deadly weapon, first
12 degree kidnapping with use of a deadly weapon,
13 possession of document or personal identifying
14 information, possession of credit or debit card without
09:48 15 cardholder's consent, involving Keandre Valentine.

16 Do you understand this advisement?

17 THE WITNESS: Yes.

18 THE FOREPERSON: Could you please state
19 your first and last name and spell both for the record.

09:48 20 THE WITNESS: Rosa Vazquez.

21 THE FOREPERSON: And spell both please.

22 THE WITNESS: R-O-S-A.

23 THE FOREPERSON: Last name.

24 THE WITNESS: V-A-Z-K-U-E-Z (sic).

9:48 25 THE FOREPERSON: Thank you so much.

09:48 1 BY MS. LEXIS:

2 Q. Good morning, Miss Vazquez.

3 A. Good morning.

4 Q. Buenos días. Are you nervous about

09:49 5 testifying this morning?

6 A. Yes, a little.

7 This is Agnes.

8 Q. Okay. It will be quick. Okay?

9 Ma'am, we're going to talk about what

09:49 10 happened to you on May 28, 2016 when you and your

11 husband were in your truck. Can you tell us what

12 happened?

13 A. It was a Saturday morning around 7 o'clock

14 in the morning. My husband and I were leaving to go to

09:49 15 work. We work in landscaping. My husband pulled out

16 the truck along with the trailer, he was ahead of me and

17 I was closing the gate. When I was walking towards the

18 truck to get inside I saw a young black person.

19 Q. Can you describe the young black person

09:50 20 that you saw?

21 A. Tall, thin, with kind of a long face with

22 eyes a little bit like if they were sad. He was coming

23 on the sidewalk of my house. I saw him walking slowly.

24 He had both his hands under his shirt. I didn't look at

9:51 25 it as something important.

09:51 1 Q. And then what happened?

2 A. I got into the truck. At that moment I
3 heard the young man approach the window to talk to my
4 husband. He asked him where the Martin Luther King
09:51 5 Avenue was.

6 Q. Did you get in the truck by that time?

7 A. Yes, I had gotten up and shut the door.

8 Q. And then what happened?

9 A. Then I heard him ask where the Martin

09:51 10 Luther King Avenue was. Then my husband said "oh shit."

11 Q. Okay. And then what happened?

12 A. Sorry.

13 Q. It's okay.

14 A. I turned around, I saw the gun against his
09:52 15 shoulder.

16 Q. Were you scared?

17 A. I turned around and was very pressed.

18 That's when I said to myself oh my God. I thought
19 quickly. He made my husband get out of the truck.

09:52 20 Q. Did he make you get out of the truck?

21 A. No. But when he was talking with my wife
22 he wanted money, was telling my husband dinero, money
23 give me the money. And was asking where's your wallet,
24 give me your wallet.

09:53 25 Q. Did your husband give him money or his

09:53 1 wallet?

2 A. He got out of the truck because he was told
3 to get out of the truck and then he put the gun against
4 his chest while he was searching his pants to see if he
09:53 5 had his wallet. I opened the door quickly and got out.
6 I was about to run.

7 Q. Did you run?

8 A. No.

9 Q. Why not?

09:53 10 A. He yell at me.

11 Q. What did he say?

12 A. He said "don't move or I'll shoot you" and
13 he pointed the gun directly at me. Then he pointed
14 again at my husband and said "you want me to kill him?"

09:54 15 So I said, "No, no, it's okay, I'm not going to move."
16 I remained standing there in front of him and my
17 husband.

18 Q. What happened next?

19 A. Then he had the gun against my husband's
09:54 20 chest. He kind of got into the car, he lifted a part in
21 the middle of the truck where we put away papers and he
22 started to move everything around, but since there was
23 nothing important, but below in the same part, in the
24 center of the truck, my purse was there.

09:55 25 Q. What color was your purse?

09:55

1

A. Black.

2

Q. And what did you have in your purse?

3

A. My bank cards, I had my Mexican card.

4

Q. Was your cell phone in there?

09:55

5

A. My cell phone was there also.

6

Q. Did you have any cash or money?

7

A. Yes, about \$40. And a lot of loose change,

8

about \$10.

9

Q. So did the robber take your purse?

09:56

10

A. Yes, he grabbed it and put it under his

11

arm. That's when he told us to get in, don't make any

12

movement because I'll shoot and leave.

13

Q. When he told you to get in, was it to get

14

into the truck?

09:56

15

A. Yes, we got in.

16

Q. Okay.

17

A. My husband pulled out and the good thing is

18

that his cell phone, since it's small he pulled it out

19

from the pocket of his pants and gave it to me because I

09:57

20

said I have to call the police. And at that moment I

21

quickly called.

22

Q. Okay. During the entire time that the

23

robber was with you and your husband, is it fair to say

24

that you were very scared, ma'am?

09:57

25

A. Well, inside I was shaking.

09:57 1 Q. Did you have to go to the --

2 A. But I did not show him fear. But I thought
3 to myself if I showed him that I was scared he could
4 shoot and kill me.

09:57 5 Q. Did you have to go to the hospital after
6 this incident?

7 A. Yes. One or two days later I couldn't stop
8 feeling lots of anxiety, like fear, a lot of fear. It
9 caused me desire to vomit and my stomach was hurting a
09:58 10 lot.

11 Q. Okay. The same day that you were robbed,
12 May 28, 2016, did the police bring you to a location on
13 J Street?

14 A. Yes.

09:58 15 Q. Did they show you an individual to see if
16 you could identify the person as being the robber?

17 A. Yes.

18 Q. I'm going to show you Grand Jury Exhibit 4
19 and 5. Do you recognize the person shown in these
09:58 20 photographs?

21 A. Yes.

22 Q. Was this the person that the police showed
23 you on May 28, 2016?

24 A. Yes.

09:59 25 Q. When the police showed you this person, did

09:59 1 you identify this person?

2 A. Yes.

3 Q. What did this person do to you and your
4 husband?

09:59 5 A. He assaulted us and he put a gun at us to
6 scare us.

7 Q. And did he take your purse?

8 A. Yes.

9 Q. For the record 4 and 5.

09:59 10 Ma'am, I'm going to show you Grand Jury
11 Exhibit Number 14. Do you recognize what's shown in
12 that photograph?

13 A. Yes.

14 Q. Okay. What do you recognize it to be?

09:59 15 A. My cell phone.

16 Q. I'm going to publish Grand Jury Exhibit
17 Number 14.

18 Was this the cellular phone that was in
19 your purse that was taken by the robber?

10:00 20 A. Yes.

21 Q. I'm going to show you Grand Jury Exhibit
22 Number 18. The red card shown in this photograph, do
23 you recognize that?

24 A. The red one, yes, mine.

10:00 25 Q. Was this a card that was in your wallet.

10:00 1 which was in your purse?

2 A. Inside my purse.

3 Q. That was taken by the robber?

4 A. Yes.

10:00 5 Q. Publishing Grand Jury Exhibit Number 18.

6 And it's the red card; correct?

7 A. Yes.

8 Q. Did you get to see the color of the gun?

9 A. Well, it was small.

10:00 10 Q. What color?

11 A. I don't remember. I saw like a dark gray.

12 MS. LEXIS: Okay. I don't have anymore
13 questions for this witness.

14 THE FOREPERSON: Are there any further

10:01 15 questions from the Grand Jury at this time?

16 If there are no further questions by the
17 Grand Jury.

18 Ma'am, by law, these proceedings are secret
19 and you are prohibited from disclosing to anyone

10:01 20 anything that has transpired before us, including
21 evidence and statements presented to the Grand Jury, any
22 event occurring or statement made in the presence of the
23 Grand Jury, and information obtained by the Grand Jury.

24 Failure to comply with this admonition is a

10:01 25 gross misdemeanor punishable up to 364 days in the Clark

10:01 1 County Detention Center and a \$2,000 fine. In addition,
2 you may be held in contempt of court punishable by an
3 additional \$500 fine and 25 days in the Clark County
4 Detention Center.

10:01 5 Do you understand this admonition?

6 THE WITNESS: Yes.

7 THE FOREPERSON: Thank you so much.

8 THE WITNESS: I want to ask a question.

9 MS. LEXIS: We'll talk to you after. Okay,

10:02 10 Rosa?

11 THE WITNESS: To come to court.

12 MS. LEXIS: Mr. Dickerson will answer your
13 question.

14 THE FOREPERSON: Thank you.

10:02 15 MS. LEXIS: Gracias.

16

17

18

19

10:02 20

21

22

23

24

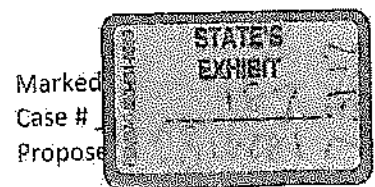
10:03 25

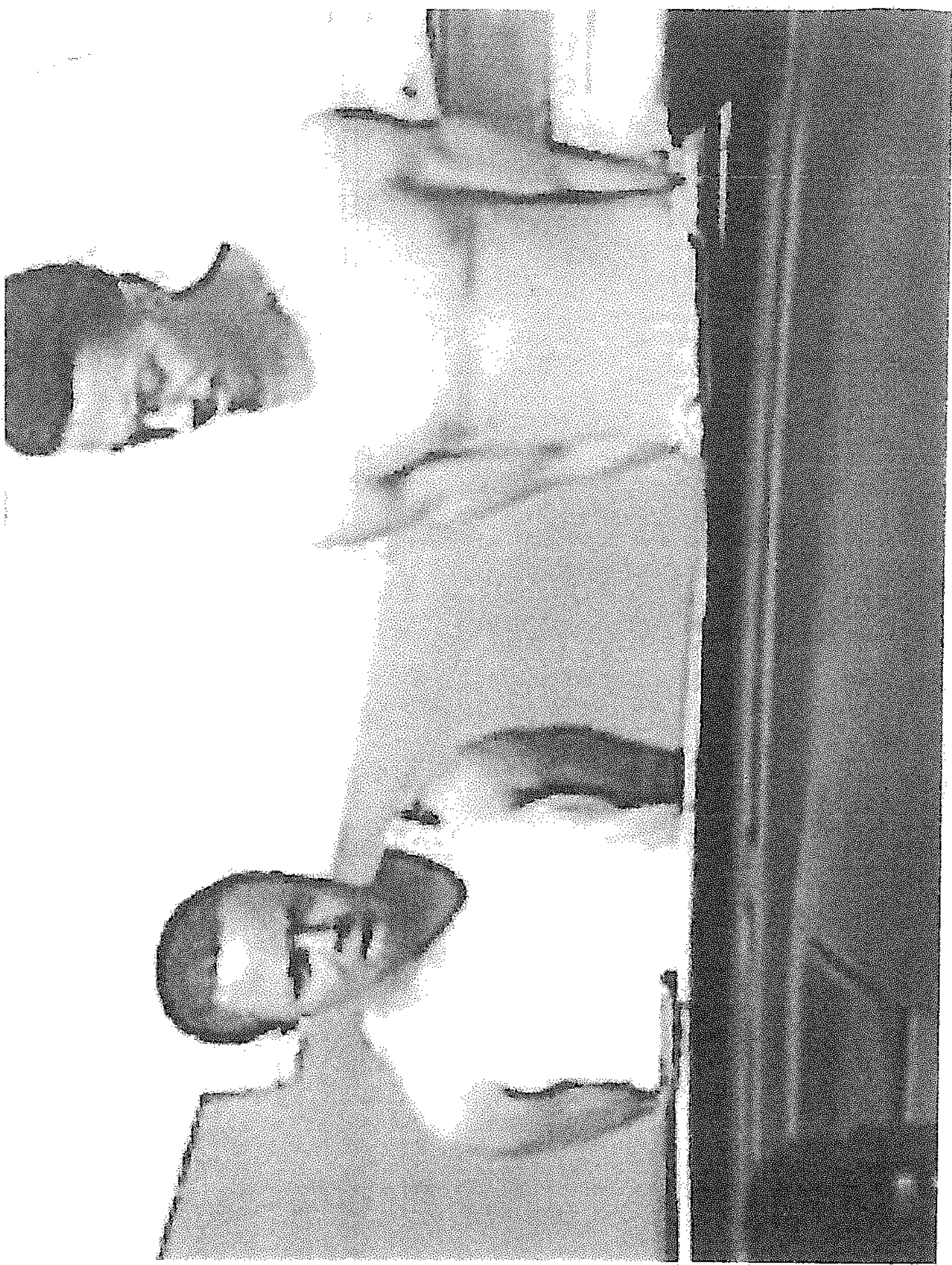
Marked
Case #
Propose



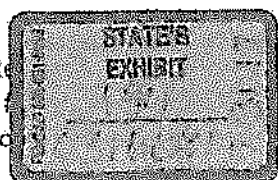
3048







Marked
Case
Propo



#2
190

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 1

EVENT #: 160528-1147

SPECIFIC CRIMES:

SUSPECT: ID#5090875

702-610-4039

CALL#: 52229515

DATE: 5/29/16

TIME: 1202 Hours

The following is the transcription of this phone call from Keandre Valentine, ID # 5090875 from the Clark County Detention Center.

Operator: Press one for English or (Spanish). The time is 1202 AM. This facility has zero tolerance for sexual abuse or sexual harassment. You may report an incident to any staff member, volunteer, or call the rape crisis and our hotline for free from any inmate phone, at 702-366-1640, press 1 (1-Beep) to place a call. Please enter your pin number follow by the # sign (11-beeps). Press zero to make a collect call or speed dial call (1-beep), for call within the United States (11-beep) (phone ringing). Hello you have a free call from Keandre Valentine, an inmate at Clark County Detention Center. To accept this call press five, to refuse this call hang up now (1-beep), to block (1-beep). This call will be recorded and subject to monitoring at any time. Thank you for using IC Solution. You may begin speaking now.

Valentine: I'm looking for my black iPhone. I got a little black iPhone in there somewhere. You heard me? Did you hear me?

Female: Huh?

Valentine: I said I got a little black iPhone in there somewhere.

Female: No, I think that they took.

Valentine: They got it?

Female: They looked. They got to have it.

Valentine: They got all pieces to the, to the, to the 27?

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 2

EVENT #: 160528-1147

Female: I don't know. You put them all over the place?

Valentine: Yeah, where did they just go, in the room?

Operator: One minute remaining.

Female: Yeah

Valentine: What's wrong? Did just went into uh the baby's room?

Female: Yeah

Valentine: One, uh one piece is in his room. You heard me?

Female: Yeah

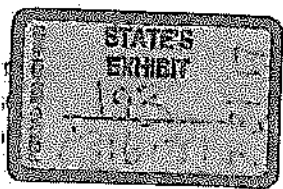
Valentine: In the gray bin. So get that and get it out of there, in the closet and one piece is on top of the side of the closet, in the shoes. Get that out of there too. You heard me? Did you hear me?

Female: What did you say?

Valentine: I said one piece is in the closet, in the (inaudible) gray bin, so get that out of there and one inside them shoes up still on top of the closet. Get that out of there.

Female: (inaudible) this mother fucker was torn apart.

Valentine: Why they torn the whole house apart?



1
189

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 1

EVENT #: 160528-1147

SPECIFIC CRIMES:

SUSPECT: ID#5090875 702-610-4039

CALL#: 52215429 DATE: 5/28/16 TIME: 1816 Hours

522

The following is the transcription of this phone call from Keandre Valentine, ID # 5090875 from the Clark County Detention Center.

Operator: Press one for English, the time is 6:16 pm. This facility has zero tolerance for sexual abuse or sexual harassment. You may report an incident to any staff member, volunteer or call the rape crisis center and our hotline for free from any inmate phone at 702-366-1640. Press one to place a call. Press two to enroll (1 Beep). Please enter your pin number follow by the # sign (12 Beeps). Press zero to make a collect call or speed dial call. Press one to make a debit call. Press three to make a free call. For calls within the United States, Canada and the Caribbean please enter the area code prefix and numbers (10 Beeps). (Phone ring) hello you have a free call from Keandre Valentine, an inmate (1 Beep)...this call will be recorded and subject to monitoring at any time. Thank you for using IC solution. You may begin speaking now.

Valentine: Hello

? Female: Hello

Valentine: What's up?

? Female: Sick

? Female: I can't...what's up? You say what?

Valentine: ...for the kids?

? Female: ... crazy kids.

Valentine: Man, I should have went to Mad Dog's house that's all.

? Female: You say what?

3056

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 2

EVENT #: 160528-1147

Valentine: I said I should went in Mad Dog's house...

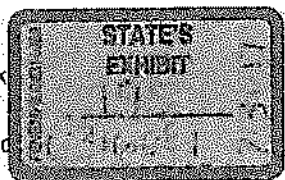
? Female: That's was ... or when I wanted you to know they were coming and you and what you would have call it supposed to be gone.

? Female: Y'all supposed to leave before they even came upstairs.

Valentine: Man, I didn't think. When I've seen them outside I didn't know what they were outside for.

? Female: Right

Transcribed by M. Lavongsar, P# 9403
Date 08/04/2016 @ 1214 hours.



2
101

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 1

EVENT #: 160528-1147

SPECIFIC CRIMES:

SUSPECT: Keandre Valentine **Phone Number:** 702-403-8154

CALL#: 52231998 **DATE:** 5/29/16 **TIME:** 8:27 a.m.

The following is the transcription of this phone call from Keandre Valentine, ID # _____ from the Clark County Detention Center.

Operator: Press 1 for English (Spanish) beep the time is 8:27am. This facility has zero tolerance for sexual abuse or sexual harassment. You may report an incident to any staff member, volunteer or call the rape crisis center hot line for free from any inmate phone at 702-366-1640. Press 1 to place a call.

Inmate: (Beep)

Operator: Please enter your pin number followed by the pound sign.

Inmate: (Beep, beep, beep, beep, beep, beep, beep, beep, beep, beep, beep)

Operator: Press zero to make a collect call or speed dial call. Press 1 to make a... For calls within the United States, Canada and...

Inmate: (Beep, beep, beep, beep, beep, beep, beep, beep, beep, beep)
(Ringing)

Operator: Hello, you have a free call from .

Inmate: Keandre Valentine

Operator: An inmate (beep). This call will be recorded and subject to monitoring at any time. Thank you for using IC Solutions. You may begin speaking now.

??: Hey, what's up?

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 2

EVENT #: 160528-1147

Valentine: Hey, what...

?: 510-586-4997. This bitch is gonna be mad at me. Already ...

Valentine: ... 586-4997?

?: Yeah. (background noise)

?: (Female voice) Hello

Valentine: Hello

?: Who is this?

Valentine: It's ...

?: What?

Valentine: This is Dray

?: Oh ...

Valentine: What's ya doin'? What's ya doin'?

?: Can you hear me?

Valentine: Yeah I can. Can you hear me?

?: Yeah

Valentine: What's ya doin'?

?: Nothin' just chillin'

Valentine: Where's the kids at?

Valentine: Huh?

?: Jeni at church.

Valentine: Oh. Why they got me with 5 counts of Robbery with a Deadly Weapon,
And some other shit.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 3.

EVENT #: 160528-1147

?: ... So what happened Keandre?

Valentine: Man they came got me out of Shanese house. fuckup. I'm in the house a sleep. They talkn' about I, I robbed 5 people and they came and pointed me out at 7 somethin' in the morn'n.

?: Oh, wow that strange. ... So you were asleep on the couch...

Valentine: No, I was sleeping in Shanese's bed and they came and they were talk'n about, they came...

?: Um..hum

Valentine: ...with a search warrant...

Valentine: They say I fit the description.

?: That's crazy.

Valentine: But they (inaudible) point'n me out, 4 out of 5 people.

?: Wow.

Valentine: Yeah, so.

?: So how they know you were at Shanese's house? I don't understand this.

Valentine: They was search'n from house to house. They were lookn'... They seen my car parked outside and they went house to house lookn' to see who drive that car. So then I sent somebody out, I sent, I sent Shanese outside to look ... so they wouldn't tow my car... they talk'n about ...

?: Um..hum

Valentine: They weren't, they came some, sornen' about a robbery or whatever with that car, with that car. So they came comn' with a big ass search warrant comn' in the house

Valentine: Yeah, so now I gotta fight (inaudible) armed robbery...they found the gun in Titis room.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 4

EVENT #: 160528-1147

??: So wow.

Valentine: I'm like what, that ain't my shit. I'm like this ain't even my house. That's not my shit, what the fuck.

??: So was there prints on there? Why would they say that?

Valentine: Yeah, I don't know. They just puttn' it on me. Cause they...

Valentine: ...man I'm safe, and the gun matched the description that what people were talkn' about. About this other shit. I'm like bro I don't give a fuck. That's my only gun in there (inaudible)

??: So Dame and Bobby were in the house too but they just put it all on you.

Valentine: Dame, Dame they let, they let Dame alone cause that he didn't fit the description. Bobby's been left, 2 days ago.

??: I told you ... and then he just crazy. But what are you supposed to leave?

Valentine: I was supposed to leave that day. Their er like, like 2 more hours after before that, that happened later, 2 hours later.

??: You should have been there. You, where, where were you out there for?

Valentine: I went out here to get, when I came out, what I come out here for? Came out here to use the... I came out here and I got the windows tinted on the car.

Valentine: That's my car now. I paid cash my damn, that's my car.

??: Ok so why you lettin' her drive it?

Valentine: ... you said what?

??: Why she drivin' your car?

Valentine: Ain't nobody drivin' my car.

Operator: Thank you for using IC Solutions, good-bye.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT
CLARK COUNTY DETENTION CENTER
PHONE CALLS

PAGE 5

EVENT #: 160528-1147

Transcribed by B. Schuman, P#4561, on 8/8/2016.

Transcribed by

Alvin D. Shuman
CLERK OF THE COURT

1 RTRAN

2
3
4
5 DISTRICT COURT
6 CLARK COUNTY, NEVADA
7

8 THE STATE OF NEVADA,)
9 Plaintiff,) CASE NO. 08C241632
10 vs.) DEPT. XVII
11 CHRISTIAN DOMINIQUE WILLIAMS,)
12 Defendant.)
13

14 BEFORE THE HONORABLE MICHAEL P. VILLANI, DISTRICT COURT JUDGE

15 TUESDAY, JANUARY 6, 2015

16 PARTIAL TRANSCRIPT OF PROCEEDINGS RE:

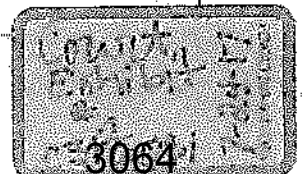
17 TESTIMONY OF MARIAH WITT
18

19 APPEARANCES:

20 For the State: MARC DIGIACOMO, ESQ.,
21 SONIA V. JIMENEZ, ESQ.,
22 Chief Deputy District Attorneys

23 For the Defendant: BRET O. WHIPPLE, ESQ.,
24 Justice Law Center

25 RECORDED BY: MICHELLE RAMSEY, COURT RECORDER



1 LAS VEGAS, NEVADA; TUESDAY, JANUARY 6, 2015

2 [Proceeding commenced at 1:09 p.m.]

3 [Previous proceedings not transcribed]

4 [Outside the presence of the prospective jury]

5
6 THE COURT: All right. Counsel, we have our witnesses here.

7 MR. DIGIACOMO: Okay.

8 THE COURT: Ms. Witt, come on up. Here's our Jury
9 Commissioner. You're going to take the witness stand.

10 THE WITNESS: Okay.

11 THE COURT: We're going to swear you in.

12 THE CLERK: Please remain stand -- standing.

13 **MARIAH WITT**

14 having been called as a witness and being first duly sworn,
15 testified as follows:

16 THE CLERK: Please be seated and then you can state and spell
17 your name for the record.

18 THE WITNESS: Okay. My name's Mariah Witt. That's spelled M-
19 A-R-I-A-H. Last name Witt, W-I-T-T.

20 THE COURT: And, Ms. Witt, can you please tell us your current
21 position here at the Regional Justice Center, your training and
22 experience, the whole disposition?

23 THE WITNESS: Okay. I am the Jury Commissioner. I have
24 currently held this position for a little over two years. My
25 background is -- I've actually worked for the County. I worked for

1 the County Clerk for probably -- I've been with the County since
2 2000, so I've been in the courts. I was in the Marriage Bureau for
3 a while and worked for the Clerk of Court for some time and then
4 here.

5 THE COURT: Can you tell us what your duties are as a Jury
6 Commissioner?

7 THE WITNESS: Wow! I am responsible for sending a -- a list
8 of pools -- pool names that are pulled from our master list which
9 we get from Nevada Energy and Nevada -- Nevada DMV. We send that
10 to a third party vendor. Those names are generated from the master
11 list which is supposed to encompass all zip codes and all
12 demographic areas are supposed to be represented, and so they are
13 selected at random. The jury management system selects them at
14 random and creates a pool. And then I send that pool to the third
15 party vendor who creates the summonses. And then the summonses are
16 mailed out.

17 Then I'm responsible for giving the instructions for the
18 various people of various pools regarding reporting on a given day.
19 And again that's by a range of numbers or a pool for a specific
20 date. Then they come in. When they come in, I give them
21 orientation. Along with my staff, give them attendance, validate
22 their parking. Then we, based on the people that are in
23 attendance, we create panels based on what I had been given for
24 panel request for that day. I enter into the system the cases that
25 are on schedule for that day, how many members that are needed and

1 then the case management system assigns those jury numbers to a
2 given panel. Then I will line those people up. They go up to the
3 courtroom.

4 So I basically facilitate that, getting the jurors to the
5 courtroom. I give them daily attendance while they are in voir
6 dire. And take care of matters pertaining to parking and that type
7 of thing.

8 When they are excused, we pay them and also take care of
9 matters of parking. And then once they're actually seated jurors,
10 then I keep track of daily attendance. And again, attendance
11 letters and parking and various things like that, coordinate with
12 the Courts regarding any of their needs that they need with respect
13 to jurors and excusals and dismissals; that type of thing.

14 THE COURT: So when you -- when you receive a panel request,
15 you said you put the request into a computer.

16 THE WITNESS: Correct.

17 THE COURT: And the computer will pick -- randomly pick the
18 individuals who will be assigned, for example, to Department 17 for
19 this trial?

20 THE WITNESS: They are randomly picked from the master list.
21 Once they come in, the system takes the first available people. So
22 -- and that is by badge number. But those badge numbers are
23 assigned randomly. So yes, they are random in that respect.

24 But I do the assignments in order according to the
25 schedules. So those of course being on calendar to start earlier,

1 I assign their panels first. So the first groups would go and then
2 the next group. So they're done chronologically after that. But
3 basically they're chronologically by badge number, but the badge
4 numbers are assigned at random if that makes sense.

5 THE COURT: Is there any determination by your office or the
6 computer program assigning a certain individual juror to, for
7 example, a criminal case versus a civil case?

8 THE WITNESS: No. I just enter -- I select the case number
9 and tell it how many jurors I need --

10 THE COURT: And is that --

11 THE WITNESS: -- perspective jurors I need.

12 THE COURT: -- is that selection one hundred percent random?

13 THE WITNESS: Correct.

14 THE COURT: And in this case, part of my pool here was
15 actually 75 jurors, you have 50 come in on Monday --

16 THE WITNESS: Uh-huh.

17 THE COURT: -- another 25 which is same --

18 THE WITNESS: On today.

19 THE COURT: -- as part of panel are waiting in your office
20 basically --

21 THE WITNESS: Correct.

22 THE COURT: -- to be called up here, so --

23 THE WITNESS: Correct.

24 THE COURT: -- this particular panel is comprised of 75
25 individuals.

1 THE WITNESS: Right. Well, the additional 25 I have not
2 actually added yet. That was the instruction that I was just to
3 hold them. I currently have done in the courtroom or in the jury
4 assembly room about 80 people. So whenever you're ready for those
5 additional 25 at that point, I will just assign it and tell the
6 system add 25 to this panel out of the people that are in
7 attendance right now.

8 THE COURT: Okay. So they're added to the panel. It's not a
9 separate new panel?

10 THE WITNESS: No.

11 THE COURT: Okay. Mr. Whipple, do you have any questions of
12 our Jury Commissioner?

13 MR. WHIPPLE: Yes.

14 Ms. Witt, I'm concerned about low numbers of African-
15 Americans that I find in the jury panel. Has that ever been a
16 discussion that you've had with anybody within your -- in your
17 department or any management positions?

18 THE WITNESS: There have been people that have asked about
19 that. As far as make up of race, again we do mail out all zip
20 codes and all demographic areas are supposed to be represented as
21 far as who actually responds and calls in and reports. We don't
22 really have any control over it. I mean, they're called, but if
23 they're there, you know, we can use them and utilize them. And if
24 they're not, then we can't. But then again, the system assigns
25 them randomly. So again, even if I had a certain race say kind of

1 a certain specific race in the courtroom, I can't pick and choose
2 because that violates the random test.

3 MR. WHIPPLE: I understand that.

4 THE WITNESS: So --

5 MR. WHIPPLE: I think I'm more concerned with the actual
6 master list and the -- and the information from which that's
7 obtained. You told me it was from DMV and energy, correct?

8 THE WITNESS: Nevada DMV and Nevada Energy, correct.

9 MR. WHIPPLE: Have you -- do you have an opinion as to what is
10 a statistical percentage of African-Americans in this community?

11 THE WITNESS: I believe so, yeah. I believe it's -- I mean,
12 do -- do I know how many?

13 MR. WHIPPLE: Right.

14 THE WITNESS: Is that -- are you asking me to make an
15 assumption?

16 MR. WHIPPLE: No. What is your understanding of the
17 statistical percentage of African-Americans in this community, if
18 you have an opinion?

19 MR. DIGIACOMO: Objection. Foundation.

20 THE WITNESS: I don't know.

21 THE COURT: Okay. You don't know?

22 THE WITNESS: For sure.

23 THE COURT: All right. Go ahead.

24 MR. WHIPPLE: Okay. Has that been anything that you've ever
25 studied or looked at?

1 THE WITNESS: Not at length, no. The only thing I've been
2 instructed to do like I said is we -- we have -- there been
3 discussions. Our current jury management system when it was
4 currently designed, race was not something that was really taken
5 into account at that time in terms of reporting.

6 I will tell you that it's a very old system. It's about
7 12 years old. We're in the process of upgrading toward a newer
8 system which is supposed to have greater flexibility in that
9 regard. But again, those reports are only as reliable as those
10 people that respond to the request to give us that information.
11 So, if I have a juror that confirms their service, but they don't
12 provide that race information, I wouldn't know, yeah.

13 MR. WHIPPLE: Who gives you your direction? When you say I
14 reported or I received direction, who is that individual or who is
15 that entity?

16 THE WITNESS: Okay. I'm sorry.

17 MR. WHIPPLE: You said I was directed or I was -- I reported.
18 Who is the person that you answer to in your position as Jury
19 Commissioner?

20 THE WITNESS: I actually report to the Assistant Court
21 Administrator and the CEO, and actually the Chief Judge, yeah.
22 That's who I report to. I mean, that's who is over me.

23 MR. WHIPPLE: Is that a group of people that you direct --
24 that you answer to or is there one person that you answer to
25 directly?

1 THE WITNESS: I have an immediate supervisor. My immediate
2 supervisor is Tim Andrews. He's the Assistant Court Administrator.

3 MR. WHIPPLE: And then so you also mentioned the Chief Judge
4 and another individual. Why did you put those into the mix?

5 THE WITNESS: Because all of the -- they are the people that
6 make the decisions within the Court and I take my direction from
7 the Court, and that's where I get my instructions.

8 MR. WHIPPLE: From those three individuals, did you ever have
9 a discussion regarding the breakdown of the -- of the cultural
10 classes that were brought into this building?

11 THE WITNESS: In the make up?

12 MR. WHIPPLE: Yes.

13 THE WITNESS: Specifically, no.

14 MR. WHIPPLE: You also mentioned that you have an older system
15 that when it draws on that master list, it's strictly with DMV and
16 with the Nevada Energy, correct?

17 THE WITNESS: Correct. That's the system we currently use and
18 it's the current system that we are currently utilizing. We are
19 working to get a new system in place, but it's not in place yet.

20 MR. WHIPPLE: What -- what is -- how would the new system
21 differ from the old system?

22 THE WITNESS: I'm not fully aware yet because we're in the
23 process of implementation, but part of the hopes of that is to have
24 better reporting processes that will give us better information in
25 terms of reporting and regarding the make-up, the composition. I'm

1 told that race reporting will be part of that, but I have not even
2 seen those reports yet. They've not been designed yet. I mean,
3 we're still very much in the early implementation stages of that,
4 but we are trying to facilitate that the best we can.

5 But again, that information is only as reliable as the
6 people that are reporting and entering the information. So if I
7 have a -- a pool of 2000 people and out of those 2000 people say
8 300 people are required to report, that information is only going
9 to -- it's going to be representative of the entire pool. It's
10 going to tell me how many responded, how many were disqualified,
11 how many were excused, and then how many -- and it will give me the
12 race breakdown of those that have responded and given that
13 information. But out of those three to 500, if they haven't
14 completed that race information, I won't know.

15 MR. WHIPPLE: That -- that --

16 THE WITNESS: I won't have that information.

17 MR. WHIPPLE: -- that's the new system you're going to,
18 correct?

19 THE WITNESS: No. That's -- well, that's the -- that's both
20 systems. Again, if they -- it's only going to be as reliable as
21 the people that provide it.

22 MR. WHIPPLE: So you do have race reporting on the current
23 system today?

24 THE WITNESS: I do have a race report.

25 MR. WHIPPLE: What does that read -- what does that race

1 report comprised of?

2 THE WITNESS: It consists of -- it's by pool. You can't do it
3 by a date range. You can only do it by a pool for one given day
4 and that particular given day it will tell me out of that pool how
5 many people responded or confirmed their service and went through.
6 There's like a jury questionnaire and it asks various things about
7 their age and their -- like I said they send in all that kind of
8 thing.

9 And one of the questions that it does ask is about race.
10 Some may or may not respond to that. I can tell you that a very
11 large percentage of the people fall into the category of incomplete
12 where they don't complete the questionnaire, so it may or may not
13 have that race information at all.

14 MR. WHIPPLE: Do you have any opinion as to what the historic
15 completion of the race portion of that jury questionnaire is?

16 THE WITNESS: I couldn't give you an exact percentage, but I
17 would tell you its quite low.

18 MR. WHIPPLE: Okay. Your best estimate would be?

19 THE WITNESS: I really couldn't ever give you one because it
20 is so random -- it's on any given day. I have some days where
21 people respond and I have a lot of responses on a given day and
22 then there are some days where it's just -- it's not as high.

23 MR. WHIPPLE: Would you have an opinion with -- Your best
24 estimate below 50 percent or over 50 percent?

25 THE WITNESS: Oh, I think it's below 50 percent that respond

1 to that.

2 MR. WHIPPLE: Okay. And have you done any studies as to why
3 the race reporting is so low?

4 THE WITNESS: No.

5 MR. WHIPPLE: And have you had any discussions with your
6 immediate supervisors with regards to why race reporting is so low?

7 THE WITNESS: No.

8 MR. WHIPPLE: Have you had any discussions with your
9 supervisors regarding increasing the race reporting percentage?

10 THE WITNESS: I suggested to them that if we want more
11 information we're going to implement procedures to try to make --
12 to really encourage the confirmation process. For example, when
13 people come in, whether they've confirmed their service or not,
14 they're accepted and we send them off to the courtroom. They may
15 or may not have had an opportunity to confirm online via the phone
16 or a juror -- or just simply just didn't do it.

17 We do get probably out of that I can estimate, and again,
18 this is a very weak estimate, maybe 10 to 15 percent of the people
19 that actually report and come in have not confirmed their service.

20 MR. WHIPPLE: Interesting.

21 THE WITNESS: Out of those that did, I couldn't tell you how
22 many completed the race information. But I can tell you that I
23 have tried to encourage that. And so one of the things I'm going
24 to try to do to increase the numbers of people that confirm is I'm
25 going to have my staff, when people call in, make sure speak to the

1 people and see if they've confirmed. If they haven't confirmed,
2 confirm with them so that we can get the information from the
3 people that are confirming.

4 And as far as the online system goes, we're just going to
5 really try to encourage that as much as we can going forward.

6 When we get the new jury management system, it's our hope
7 because we are going to have kiosks that people that report that
8 have not confirmed that will have the opportunity to invite those
9 people reporting that haven't previously confirmed and entered that
10 information to go to a kiosk, enter that information, so that we
11 should have a higher percentage.

12 So we are trying to get more information. And it's not
13 just race information either. It's all the information. It's any
14 --

15 MR. WHIPPLE: Sure.

16 THE WITNESS: -- information that we can get. It's gender.
17 It's all of the information that it asks.

18 MR. WHIPPLE: The race report for yesterday and today, do you
19 have that available?

20 THE WITNESS: I have that -- the one for today is not complete
21 because today's service is not done. I do have the report for
22 yesterday available. I did not bring that with me, but I can have
23 it brought up.

24 MR. WHIPPLE: With the Court's permission, I would just ask
25 for a copy of the race report for yesterday and today.

1 THE COURT: Do you have any objection --

2 MR. WHIPPLE: Make that part of the record.

3 THE COURT: -- to turning that over to us?

4 THE WITNESS: I don't. No.

5 THE COURT: Okay. Any more questions?

6 MR. WHIPPLE: No, Your Honor.

7 THE COURT: Ms. -- Ms. Jimenez, Mr. DiGiacomo, do you have any
8 questions for our Commissioner?

9 MR. DIGIACOMO: Just to make it clear, at no point during the
10 process of selection of a jury is there any determination as to
11 whose going to sit or not going to sit based upon race?

12 THE WITNESS: Absolutely not.

13 MR. DIGIACOMO: And so, while you may -- your new system may
14 seek to gather better demographics, it's not -- the new system
15 isn't going to be -- isn't being made to create a system to
16 increase or decrease what your demographics are --

17 THE WITNESS: Yes.

18 MR. DIGIACOMO: -- it's just a reporting system of
19 information?

20 THE WITNESS: Correct. It's just to report the information of
21 the people that actually do appear.

22 MR. DIGIACOMO: And as far as you're aware as the Jury
23 Commissioner at no point is there any discrimination against any
24 discreet group of individuals when it comes to jury reporting?
25 It's you get the names, you receive the information and you assign

1 them out to courtrooms and at no point is race considered at all?

2 THE WITNESS: Correct. I -- I can't even see their race in
3 the record. That report has to be pulled in a separate report and
4 it's anonymous. It doesn't give names. It just simply gives out
5 of a pool of 2000 this are how many responded, this is how many
6 that indicated they were male or female, this is how many indicated
7 that they were black or white or Hispanic.

8 MR. DIGIACOMO: And so the report that you're going to pull
9 for yesterday is for all juries here in the RJC, it's not going to
10 just be for this department's jury?

11 THE WITNESS: It's the entire -- yes. It will be the entire
12 pool. It's not just the people that appeared. It's the entire
13 pool for yesterday's date. So, I had 2000 people that were in the
14 pool for yesterday's date.

15 MR. DIGIACOMO: And that's the information we'll get is --

16 THE WITNESS: So that is the information that applies to the
17 entire pool.

18 MR. DIGIACOMO: Thank you very much. I have no further
19 questions.

20 THE COURT: Any further questions, Mr. Whipple?

21 MR. WHIPPLE: Just -- you are moving towards a new improved
22 jury selection process?

23 THE WITNESS: Correct. We're always trying to improve and
24 enhance our services and try to make things more efficient and more
25 accurate and yes.

1 MR. WHIPPLE: And more reasonably cover the community? More
2 fairly cover the community?

3 THE WITNESS: Well, I don't think -- that I don't think is
4 what the issue is in our terms. We're just trying to upgrade and -
5 - and make the efficiencies better. I don't think -- it's not a
6 result of not having specific areas represented. We already pull
7 from the entire community; that's why we go to Nevada DMV and
8 Nevada Energy because we figure just about everybody has an energy
9 account or a driver's license. That's why we don't use the voter's
10 table. Not everybody votes. So, we do Nevada DMV and Nevada
11 Energy. And we will continue to use those same lists.

12 So regardless of which system we use, it's still going to
13 be that same master list that we pull from. It's going to be the
14 same demographics. The only thing that the new system is going to
15 do for you is hopefully have better reporting, more flexible
16 reporting. I'm hoping to have reports that don't give me just a
17 given day, but then maybe to have a period of time. This is one of
18 the things I'm trying to work to do so that I could say, okay, from
19 -- you know, from the month of January, you know, get a report for
20 the entire month as opposed to just for one pool for one day.

21 MR. WHIPPLE: Nothing further, Your Honor. Thank you.

22 THE COURT: Anything further by the State?

23 MR. DIGIACOMO: No, Your Honor.

24 THE COURT: Commissioner, thank you very much --

25 THE WITNESS: You're welcome.

1 THE COURT: -- for your time. I appreciate it. Let's -- you
2 can go ahead.

3 THE WITNESS: Okay.

4 THE COURT: You're excused.

5 THE WITNESS: Okay. How do you want me to submit the report?
6 Just email it or --

7 THE COURT: Email it to my law clerk or to Cindy.

8 THE WITNESS: Okay.

9 THE COURT: Thank you very much.

10 THE WITNESS: All right.

11 THE COURT: All right.

12 THE WITNESS: You're welcome.

13 THE COURT: Let's call the jury in.

14 MR. WHIPPLE: Thank you, Your Honor.

15 [Testimony of Ms. Witt concluded at 1:27 p.m.]

16 [Subsequent proceedings not transcribed]

17

18 * * * * *

19

20

21 ATTEST: I hereby certify that I have truly and correctly
22 transcribed the audio/video proceedings in the above-entitled case
to the best of my ability.

23

24

25

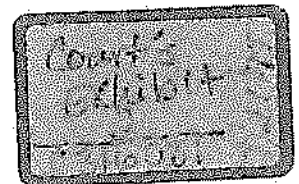
Michelle Ramsey
Michelle Ramsey
Court Recorder/Transcriber

Can he turn it
over to confirm it
is his phone?

#14 TIM DUERSON

did anyone ever turn it in
to find out whose phone it was?

Owner



BASE #45

SAMMY ANSWER

IN PLACE OF CEN ON MARCH 5TH,
IT APPEARS IT WAS OCCUPANCY CHAIRMAN
WITH BUNKS THROWN CLOSED

LATER, IT APPEARS I STARTED WITH
CHAIRMAN ATTACHED WITH BUNKS OPEN.

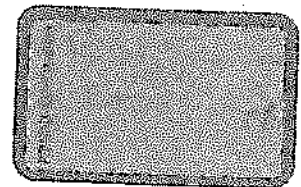
1) DO YOU RECALL ANYONE READING

THE CHAIRMAN OR DISTURBING THE CHAIR?

2) IS THIS THE SAME PLACE / BUILDING?

3) WAS IT CAUSED BY OCCUPANCY?

Given



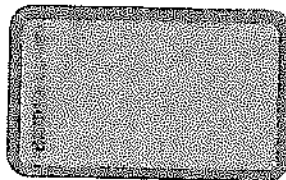
Louie #020

① Who is Denise Williams?
Where did she arrive
from, before officers
talked to her?

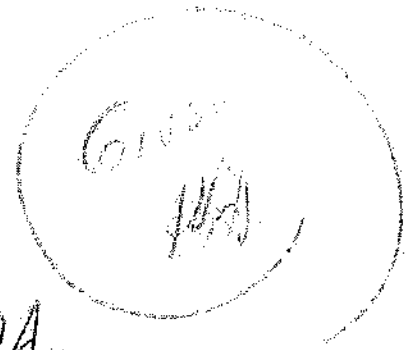
② Who was the renter
of the apt? and how
many people lived
there?

Given
HJ

③ I would like to
hear from the woman
who lived in the
apt testify.

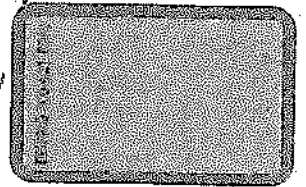


Not
mentioned
HJ



~~Does~~

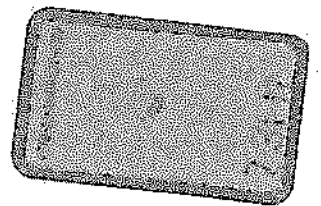
Does Mr.
Torres remember
what hand
the suspect
held the gun
in



#4 Karen
Smallwood

June 4 Ellen McFadyen
Where did the 2nd
starting person come
from?

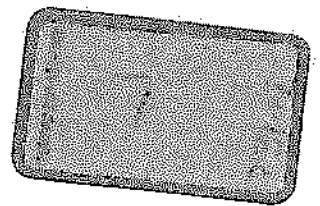
Gina
HJ



Benjamin Middlestar
#10
~~was in the photo~~

Ref: Mr. Valentine
was Bobby ^{James} Maloy the
other individual in the
the show-up photo?

Gruber
JH



Reilly

Juror # 7

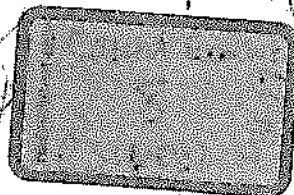
For Clarification,

What is the
Name of the
2ND Male in
picture # 1892

Is that

Bobby
McDuff?

6/2/92
JH



State v. Keandre Valentine

Case No. C-16-316081-1

Tentative Ruling on Defendant's Objection To State's Proposed Admission of Audio Recording and Transcript of Certain CCDC Phone Calls By Defendant

General Comments About the Court's Analysis

In considering the admissibility of each of the statements from the jail calls, the Court must first determine whether the statements are relevant. Relevant evidence is defined as "evidence having any tendency to make the existence of any fact that is of consequence to the determination of the action more or less probable than it would be with the evidence." NRS 48.015. Relevant evidence is admissible unless otherwise precluded by the law. NRS 48.025. The jail calls contains numerous relevant and irrelevant statements. The Court cannot make a blanket order that entire calls are admissible or inadmissible, but must carefully consider separately each statement, or grouping of statements.

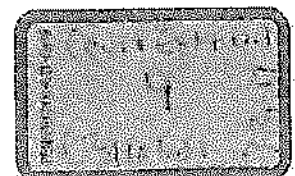
If a statement has at least slight relevance, then the Court proceeds to consider whether any rule of evidence calls for the exclusion of such evidence. For instance, the rules of evidence generally prohibit the admission of uncharged bad act evidence that is offered to show the Defendant has a bad character and propensity to commit the crimes charged. NRS 48.045. NRS 48.055. Some statements in the jail calls from persons other than the Defendant seem to contain inadmissible hearsay. NRS 51.065.

The next phase in the Court's analysis is to determine whether the probative value of the evidence is substantially outweighed by the danger of unfair prejudice caused by the evidence. NRS 48.035. As part of this analysis, the Court also considers whether the evidence would be confusing or misleading to the jury. Evidence is not unfairly prejudicial merely because it tends to prove that the defendant may be guilty. *See, e.g., United States v. Parker*, 549 F.2d 1217, 1222 (9th Cir. 1977) (holding evidence of the defendant's prior drug use was admissible in the robbery trial because it tended to show motive noting that "evidence relevant to defendant's motive is not rendered inadmissible merely because of its highly prejudicial nature . . . The best evidence often is!").

A. Phone Call on 5/28/16 at 6:16 P.M.

This phone call seems relevant because the Defendant makes an admission of his belief that he should have gone to "Mad Dog's" house (instead of Shaneese's house) on the day he was arrested. This discussion supports an inference that the Defendant knew he committed a crime, and was trying to evade arrest. Such inference is relevant to both the issue whether the Defendant committed a wrongful act, and the Defendant's state of mind in committing the act. *Abram v. State*, 95 Nev. 352, 356, 594 P.2d 1143, 1145 (1979). The relevance of the admission is high, and is not substantially outweighed by any risk of unfair prejudice, confusion, or misleading of the jury. NRS 48.035(1).

TENTATIVE: ADMITTED



B. Phone Call on 5/28/16 at 11:23 P.M.

This phone call can be divided into three main parts. Part One contains mainly a discussion of Defendant's frustration in being charged with 11 felony counts; reference to another incarcerated defendant named "Mike" that the Defendant appears to know; and discussion about being moved from the "bull pen" to a "unit." Part Two contains mainly a discussion about the police handling of the various phones found at the time of the arrest, and the Defendant's comment about "Don't give um the code to my phone." Part Three contains mainly a discussion about the Defendant needing money on his books.

The Court does not believe that Part One is relevant. Part One begins after the Operator states "You may begin speaking now," and ends about three pages later, after the State's proposed redaction, with the word's "No, what." The Court is concerned that this part of the call is very unfairly prejudicial to the Defendant because it depicts the Defendant using slang words, using curse words, using urban speech, and demonstrating an inside knowledge of the jail processes. The Court understands that foul language is not an automatic or necessary reason to exclude evidence. See, e.g., *United States v. McAtee*, 481 F.3d 1099, 1104 (8th Cir. 2007) (citing *United States v. Pirani*, 406 F.3d 543, 555 (8th Cir. 2005) (*en banc*), cert. denied, 546 U.S. 909, 126 S. Ct. 266, 163 L. Ed. 2d 239 (2005) (holding that admission of profanity was not unduly prejudicial)). But the Court does believe that foul language that puts the Defendant in a bad light is unduly prejudicial where the evidence constituting the foul language is not introduced for some probative purpose, and is not needed to provide context for other probative evidence.

Any relevance to the jail conversation seems to be slight, at best, and is substantially outweighed by the risk of unfair prejudice to the Defendant. NRS 48.035(1).

TENTATIVE RE PART ONE: EXCLUDED

The Court believes that there is moderate relevance to Part Two because the Court believes there is some confusion about what phones were allegedly taken from the alleged victims during the robberies, which phone belonged to the Defendant, which phones were confiscated by the police; and which phones are now in evidence. This jail phone call assists to some extent in providing information about the phones, which assists the jury in completing the story. Part Two begins with the words spoken by the Defendant "You got my, you got my phone right?", and ends with Defendant's statement: "Don't give um the code to my phone, they think they slick, they (inaudible) look at my pictures (inaudible) get in there."

With the exception of the last statement by the Defendant in this section, the relevance of the evidence is not substantially outweighed by the risk of unfair prejudice, confusion, or misleading the jury. The last statement, however, is a problem. This statement presents the Defendant as obstructing justice – an uncharged bad act. It is not necessary for the State to discuss this uncharged bad act to "present a full and accurate account of the circumstances surrounding the commission of [the] crime." *Bracken v. State*, 104 Nev. 547 (1988). Finally, in this Part Two, there seems to be about one page of some irrelevant extraneous discussion beginning with "you talking hella sleepy," through "I said you going get

you some tea of something." This irrelevant extraneous discussion should be excluded because it has no probative value and depicts the Defendant using curse words, saying "shit happens."

TENTATIVE RE PART TWO: ADMITTED (Except, last statement by Defendant about "Don't give um the code" etc. is EXCLUDED; and the "shit happens" section is EXCLUDED).

As for Part Three (which begins with "Oh yea (inaudible)," about putting money on the defendant's account, there seems to be no probative value to this evidence. Any slight relevance is substantially outweighed by the risk of unfair prejudice because it shows the Defendant's familiarity with the jail processes, and leads the jury to believe he has been in jail before, and must be a bad person generally. NRS 48.035(1).

TENTATIVE RE PART THREE: EXCLUDED

C. Phone Call on 5/29/16 at 12:02 A.M.

This phone call can be divided into four main parts. Part One contains a discussion of the Defendant stating he is "angry at myself right now" and that he "tried" to stay out of trouble. Part Two contains various alleged bad acts, and begins with Defendant's statement "running his smart ass mouth," and goes through "she's a little sensitive." Part Three is a discussion of the victim identifications, and begins with "They talked to them," and runs through "I've heard pretty much of everything (inaudible)." Part Four is a discussion of the Defendant's phone and hiding of the gun parts.

Part One seems somewhat relevant in that it shows the Defendant has a guilty state of mind. The Defendant's admission that he is angry at himself is not excluded by the hearsay rule. It is not clear to the Court why the Defendant is angry with himself, or why he feels he only "tried" to stay out of trouble. A reasonable person could possibly draw a reasonable inference that the Defendant was angry at himself because he did not stay out of trouble, and felt guilty for the crimes charged. An alternative reasonable inference is that the Defendant felt guilty and angry because, despite following the law, he still got arrested for something he didn't do. In any event, the Defendant has not been found guilty for anything yet. So it is too speculative to try to determine what the Defendant meant by his statements. The moderate relevance of the statements are outweighed by the great risk of unfair prejudice to the Defendant. NRS 48.035(1).

TENTATIVE RE PART ONE: EXCLUDED

Part Two contains a series of uncharged bad acts that may be relevant in demonstrating the defendant's bad character. There is discussion about making his sister cry. There is also discussion about the need to "keep white bitch looking plain," and "out nigger fuck that snow Bunny" – suggesting possibly some sort of pimping/pandering/prostitution activity. Any relevance does not matter because this uncharged bad act evidence is inadmissible. It is also highly unfairly prejudicial. NRS 48.035(1).

TENTATIVE RE PART TWO: EXCLUDED

may have been involved in some criminal activity with others; suggesting some other bad acts; and some possible conspiracy. Second, there is discussion about the Defendant not sending his friend money. This discussion runs from the statement "Wow" until the statements "Who ever car it is. Your bitch car, ya'll car, who ever."

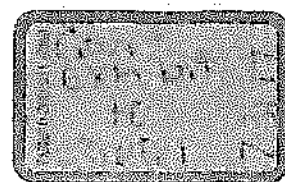
TENTATIVE: ADMISSIBLE (except discussion about "the only one in jail," and not sending friend money).

Tentative Ruling On Defendant's Objection To Jury Receiving Evidence Of Such Calls By Way of Audio and Transcript

With respect to those portions of the phone calls that are admissible into evidence, the Court will permit the State to introduce the redacted audio recordings into evidence during trial. To assist the jury in comprehending the audio evidence, the State may provide the jury with the redacted transcripts of the audio recordings to follow along during the playing of the audio. The properly redacted transcripts may be introduced into evidence. The transcripts may be provided to the jury in the jury room during deliberations. The audio recording shall not go back to the jury room; instead, the audio recordings shall be treated as any other trial testimony, and may be re-played in Court if the Jury requests a play-back.

The Court agrees that the introductory portions of the jail calls are admissible to identify to the jury what they are listening to, from the point of the Operator beginning to speak, to when the Operator says "You may begin speaking now."

THE STATE IS DIRECTED TO REDACT THE TRANSCRIPTS AND AUDIO RECORDINGS IN ACCORDANCE WITH THIS TENTATIVE RULING, UNLESS THE COURT ORDERS OTHERWISE.



3092

CONTINUATION REPORT

160526-1133 ID

ID/EVENT #: 5090875

witnessed by Det A. Ubbens. We entered William's apartment and located a black male adult thin built, approx. 6' sleeping in the masterbed room wearing flip flops. The subject identified himself as Leondre Jones DOB 04/28/94. Records check showed no records for Jones via DMV or Scope. The suspect was later identified as Keandric Valentine DOB 04/28/94 through PID at CGDC.

The address of 1701 "J" street building #3 apartment #218 and 2016 Mazda was froze till we could obtain a telephonic search warrant. Valentine was detained and escorted outside for victim show ups.

Det. D. Ludwig P# 12963 obtained a telephonic search warrant for 1701 "J" street building #3 apartment 218 and the 2016 Mazda VIN# jm1bm1t77g1344926 from the Honorable Judge J. Sciscento. A .40 Caliber Glock was recovered in two pieces. One was found in the master bedroom and the other piece found in Williams 4 year old son's room identified as Tutius Earl Williams with two .40 rounds. The fire arm was impounded by CSA Smith for and will be submitted for testing. Four cell phones were recovered in the apartment that did not belong to Shanise Williams.

The following items were recovered in the master bedroom; one Nevada identification in the name of Jordan Alexander dl# 1405002918, one Visa debit card in the name of Jordan Alexander # 4342574993098220, One Visa Debit Card # 4342574989339521 in the name of Rosa Vasquez-Ramirez.

At 0855 hours, Alexander Jordan signed the LVMPD show up witness instructions and positively identified Valentine as the person that robbed him by his facial features.

At 0910 hours, Lazero Bravo- Torres signed the LVMPD show up witness instructions and 90% positively identified Valentine because he had the same face, same height but hair was combed differently.

At 0910 hours, Rosa Vasquez signed the LVMPD show up witness instructions. Vasquez positively identified Valentine at 95% due to having the same built, same face, same hair but not wearing the same clothes

At 0917 hours, I conducted a show up with Darrell Faulkner which was updated in cad. Faulkner was 100% positive that Valentine was the subject that robbed him and his wife at gun point.

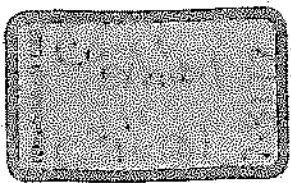
At 0950 hours Santiago Garcia signed the LVMPD show up witness instructions and positively identified Valentine as the subject that robbed him at gun point.

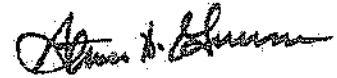
I called victim, Marvin Bass DOB 05/23/57 and left a message to set up time to conduct photo line ups at a later time.

Valentine was placed under arrest and transported to Bolden Area Command to be interviewed.

At 1050 hours, I conducted a taped and video recorded interview with Valentine where he was read his rights as per Miranda where he stated "yes" to understanding his rights. The following is a summary of the interview and is not verbatim:

Valentine stated that he first came to Las Vegas on 05/27/16 with a friend and did not know anything about the recent robberies. Valentine first stated that he had never been in the 2016 Mazda and then changed his story.





CLERK OF THE COURT

MOT
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
AGNES M. LEXIS
Chief Deputy District Attorney
Nevada Bar #011064
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-

KEANDRE VALENTINE,
#5090875

Defendant.

CASE NO: C-16-316081-1

DEPT NO: III

**NOTICE OF MOTION AND MOTION OUTLINING
STATE'S DISCOVERY COMPLIANCE**

DATE OF HEARING: 02/21/17
TIME OF HEARING: 9:00 A.M.

COMES NOW, the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through AGNES M. LEXIS, Chief Deputy District Attorney, and files this Notice Of Motion And Motion Outlining State's Discovery Compliance.

This Motion 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.

//

//

//

//

//

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

DATED this 8th day of February, 2017.

BY /s//AGNES M. LEXIS
AGNES M. LEXIS
 Chief Deputy District Attorney
 Nevada Bar #011064

On July 29, 2016, Defendant was charged by way of Indictment with fourteen (14) felony counts to include six (6) counts of Robbery with Use of a Deadly Weapon. On July 7, 2016, Defendant entered a not guilty plea and invoked his speedy trial right. Defense counsel made an oral request for discovery at that time. Trial was set for September 6, 2016.

On August 9, 2016, the State conveyed an offer to resolve the case. Defendant presented a counter-offer, which the State rejected.

On September 1, 2016, Defendant made an oral motion to continue the trial. The State objected and announced ready. Defendant waived his right to a speedy trial. The court vacated the trial date, noting that it was the first trial setting. Trial was reset for February 21, 2017. The court also granted Defendant's Motion for Discovery pursuant to statute and Brady.

1 On January 24, 2017, the State invited defense counsel to conduct a file review. Defense
2 counsel indicated she would be in trial and could not meet on January 27, 2017 to complete
3 the file review. To date, defense counsel has not made an appointment to conduct the file
4 review.

5 On Thursday, January 26, 2017, the State re-disclosed the paper discovery in this case,
6 bate stamped 1-286 and advised defense counsel that a CD with jail calls would be available
7 for pick-up at DA reception. The State attached an ROC to the January 26th email and
8 requested that defense counsel look over the discovery the State has provided and return the
9 signed ROC to the State in one (1) week. In that same email, the State again requested that
10 defense counsel complete a file review. The State also advised defense counsel that it would
11 object to a Motion to Continue Trial and requested that any request for a continuance be
12 submitted in writing, in a timely fashion.

13 On February 7, 2017, the State requested that defense counsel return the signed ROC
14 so it may file it with the court, in advance of the February 16th calendar call date. Defense
15 counsel indicated she had not yet verified the items on the list and refused to sign the ROC.
16 Defense counsel also indicated that she would not go to trial on this case on February 21, 2017.
17 To date, a Motion to Continue has not been filed.

18 POINTS AND AUTHORITIES

19 Pursuant to this court's order on September 1, 2016, the State has provided the
20 following items of discovery to defense counsel:

- 21
- 22 1. Thumbnails of Photos for event number ending in 1147 provided via email on 6/6/16
 - 23 2. Thumbnails of Photos for event number ending in 1116 provided via email on 6/6/16
 - 24 3. Booking Photo of Defendant provided via email on 6/10/16
 - 25 4. LVMPD reports per June 2016 subpoena provided via email on 6/14/16
 - 26 a. Disclosed again via email on 1/26/17; bate stamped 000157-000199
 - 27 b. The following items were disclosed on 6/14/16 and 1/26/17
- 28

- i. Marvin Bass Photo Line Up Witness Instructions/Statement; bate stamped 000157
- ii. Premier One Report event #: 160526-2109; bate stamped 000158-000160
- iii. Booking Voucher; bate stamped 000161-000162
- iv. TCR; bate stamped 000163
- v. Declaration of Arrest; bate stamped 000164
- vi. Arrest Report; bate stamped 000165-000171
- vii. Officer's Report; bate stamped 000172-000174
- viii. Show Up Witness Instructions; Santiago Garcia; bate stamped 000175
- ix. LVMPD witness list; bate stamped 000176-000180
- x. Request for Prosecution; bate stamped 000181-000182
- xi. Property Report dated 5/28/16 completed by Officer A. Ubbens; bate stamped 000183
- xii. Written Voluntary Statement by Santiago Garcia; bate stamped 000184
- xiii. Written Voluntary Statement by Jordan Alexander; bate stamped 000185
- xiv. Premier One Report event #: 160528-1133; bate stamped 000186-000187
- xv. Written Voluntary Statement; Darrell Faulkner; bate stamped 000188
- xvi. Premier One Report event #: 160528-1116; bate stamped 000189-000190
- xvii. Show Up Witness Instructions, Jordan Alexander; bate stamped 000191
- xviii. Premier One Reports event #: 160528-1129; bate stamped 000192-000193
- xix. Show Up Witness Instructions; Lazaro Bravo (Spanish); bate stamped 000194
- xx. Show Up Witness Instructions; Rosa Vasquez (Spanish); bate stamped 000195
- xxi. Written Voluntary Statement; Rosa Vasquez (Spanish); bate stamped 000196
- xxii. Written Voluntary Statement; Lazaro Bravo (Spanish); bate stamped 000197

- xxiii. Premier One event #: 160528-1147; bate stamped 000198-000199
5. CD of 911 calls (4) and photos from event numbers ending in 1147 and 1116 made available for pick-up; advised defense counsel in 6/14/16 email
 6. CAD Logs received per June 2016 subpoena provided via email on 6/14/16
 7. Marcum Notice emailed to defense counsel on 6/15/16
 8. SW for 1701 J Street, Apt. 218 provided via email on 6/22/16
 9. CD of Defendant's video-taped statement made available for pick up; advised defense counsel via email on 6/27/16
 10. Transcript of jail call made to 702-610-**** at 11:23 p.m. provided via email on 8/9/16
 - a. Disclosed again on 1/26/17 via email; bate stamped 000021-000029
 11. Transcript of jail call made to 702-610-**** at 12:14 a.m. provided via email on 8/9/16
 - a. Disclosed again on 1/26/17 via email; bate stamped 000039-000045
 12. Transcript of jail call made by Defendant at 18:16 hours provided via email on 8/9/16
 - a. Disclosed again on 1/26/17 via email; bate stamped 000046-000052
 13. Transcript of jail call made by Defendant at 12:02 a.m. provided via email on 8/9/16
 - a. Disclosed again on 1/26/17 via email; bate stamped 000053-000058
 14. Transcript of jail calls made by Defendant to 702-403-**** at 8:18 a.m. provided via email on 8/9/16
 - a. Disclosed again on 1/26/17 via email; bate stamped 000059-000065
 15. Search Warrant for Buccal Swab provided via email on 8/9/16 provided via email on 8/9/16
 16. Filed Information for Defendant's other case, C309398 in DC 9 provided via email on 8/9/16
 17. Latent Print Report for event #: 160528-1147 distribution date 8/11/16 provided via email on 8/11/16
 - a. Disclosed again via email on 1/26/17; bate stamped 000152
 18. Transcript of jail call made by Defendant at 9:55 a.m. provided via email on 8/12/16
 - a. Disclosed again on 1/26/17 via email; bate stamped 000001-000009
 19. Transcript of jail call made by Defendant at 8:27 a.m. provided via email on 8/12/16

- 1 a. Disclosed again on 1/26/17 via email; bate stamped 000010-000020
- 2 20. Transcript of jail call made by Defendant at 9:04 a.m. provided via email on 8/12/16
- 3 a. Disclosed again on 1/26/17 via email; bate stamped 000030-000038
- 4 21. LVMPD reports received per September 2016 subpoena provided via email on 8/15/16
- 5 a. Disclosed again via email on 1/26/17; bate stamped 000200-000251
- 6 b. The following items were in disclosed on 9/6/16 and 1/26/17
- 7 i. Booking Voucher; bate stamped 000200-000201
- 8 ii. TCR; bate stamped 000202
- 9 iii. Declaration of Arrest; bate stamped 000203
- 10 iv. Arrest Report; bate stamped 000204-000210
- 11 v. Marvin Bass; Photo Line Up Witness Instructions; Bate stamped 000202
- 12 vi. CSA report; event #: 160528-1116; victim Darrell Faulkner; bate
- 13 stamped 000212
- 14 vii. AFIS report distributed on 7/18/16; bate stamped 000213
- 15 viii. Written Voluntary Statement; Darrell Faulkner; bate stamped 000214
- 16 ix. Jordan Alexander; Show Up Witness Instructions; bate stamped 000215
- 17 x. Officer's Report; bate stamped 000216-000218
- 18 xi. Santiago Garcia; Show Up Witness Instructions; bate stamped 000219
- 19 xii. Property Report dated 5/28/16 completed by Officer A. Ubbens; bate
- 20 stamped 000220
- 21 xiii. Request for Prosecution; bate stamped 000221-000222
- 22 xiv. Written Voluntary Statement; Jordan Alexander; bate stamped 000223
- 23 xv. Written Voluntary Statement; Santiago Garcia; bate stamped 000224
- 24 xvi. LVMPD Witness List; bate stamped 000225-000229
- 25 xvii. CSA Report for Mazda; bate stamped 000230-000231
- 26 xviii. CSA Report for Ford F-150 bate stamped 000232
- 27 xix. CSA Evidence Impound Report; 1701 J. Street #3-218; bate stamped
- 28 000233
- xx. CSA Report – Firearm Impound; bate stamped 000234-

- xxi. Latent Print Report distribution date 7/18/16; bate stamped 000235
- xxii. Show Up Witness Instructions, Rosa Vasquez (Spanish); bate stamped 000236
- xxiii. Show up Witness Instructions; Lazaro Rosa (Spanish); bate stamped 000237
- xxiv. Property Report by Det. Majors; buccal swab; bate stamped 000238
- xxv. Written Voluntary Statement, Lazaro Bravo (Spanish); bate stamped 000239
- xxvi. Written Voluntary Statement; Rosa Vasquez (Spanish); bate stamped 000240
- xxvii. Premier One event #: 160526-2109; bate stamped 000241-000243
- xxviii. Premier One event #: 160528-1116; bate stamped 000244-000245
- xxix. Premier One event #: 160528-1129; bate stamped 000246-000247
- xxx. Premier One event #: 160528-1133; bate stamped 000248-000249
- xxxi. Premier One event #: 160528-1147; bate stamped 000250-000251
- xxxii. Rosa Vasquez; Photo Line Up Statement Translated from Spanish to English; bate stamped 000252
- xxxiii. Rosa Vasquez; Written Voluntary Statement Translated from Spanish to English; bate stamped 000253
- xxxiv. Original Photo Line Up Statements & Written Voluntary Statements for Rosa Vasquez & Lazaro Bravo; Bate Stamped 000254-000257
- xxxv. Property Report; Buccal Swab; bate stamped 000258
- xxxvi. Return SW; buccal swab; bate stamped 000259
- xxxvii. Search Warrant buccal swab; bate stamped 000260-000274
- xxxviii. Search Warrant for 1701 J Street, Apt. 218; bate stamped 000275-000280
- xxxix. Return SW 1701 J Street, Apt. 218; bate stamped 000281
- xl. Return SW Mazda and 1701 J Street; bate stamped 000282
22. DNA report provided via email on 9/20/16
- a. Disclosed again via email on 1/26/17; bate stamped 000131

23. Body Camera videos made available for pick up; advised defense counsel via email on 8/15/16
24. AFIS results – Latent Prints; disclosed on 1/26/17 via email; bate stamped 000066
25. CAD Logs, Unit Logs, COR Certifications per September 2016 subpoena; provided via email on 1/26/17; bate stamped 000067-000090
26. CCDC Records Intel Certification provided via email on 1/26/17; bate stamped 000091
27. CCDC records per June 2016 subpoena provided via email on 1/26/17; bate stamped 000092-000101
28. CCDC records per September 2016 subpoena provided via email on 1/26/17; bate stamped 000102-000125
29. CSA report – Firearm Impound provided via email on 1/26/17; bate stamped 000126
30. CSA report – Evidence Impound Report firearm located at 1701 J. Street #218; provided via email on 1/26/17; bate stamped 000127
31. CSA report – Mazda truck provided via email on 1/26/17; bate stamped 000128-000129
32. CSA report – Ford F-150 provided via email on 1/26/17; bate stamped 000130
33. Certified Judgments of Convictions and accompanying documents provided via email on 1/26/17; bate stamped 000132-000151
34. Lazaro Bravo Show Up Statement Spanish translated to English provided via email on 1/26/17; bate stamped 000154-000155
35. Lazaro Bravo Voluntary Statement Spanish Translated to English provided via email on 1/26/17; bate stamped 000156
36. Pre-trial Services Intake Sheet; bate stamped 000283
37. Filed Information for Defendants DC 9 case; bate stamped 000284-000286

//

//

//

//

//

//

1 38. CD of jail calls from 5-28-16 to 8-19-16 made available for pick up at DA Reception
2 on Friday, 1/27/17; total of 40 calls; defense counsel advised via email on 1/26/17

3 DATED this 8th day of February, 2017.

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

7 BY /s//AGNES M. LEXIS
8 AGNES M. LEXIS
9 Chief Deputy District Attorney
10 Nevada Bar #011064

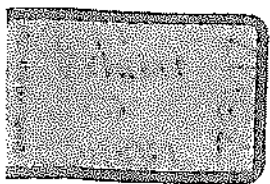
11 **CERTIFICATE OF ELECTRONIC FILING**

12 I hereby certify that service of State's Motion was made this 8th day of February, 2017,
13 by Electronic Filing to:

14 TEGAN MACHNICH, Deputy Public Defender
15 E-mail Address: tegan.machnich@ClarkCountyNV.gov

16 Shellie Warner
17 Secretary for the District Attorney's Office

18
19
20
21
22
23
24
25
26
27
28 mmo/GCU



1 **ROC**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 AGNES M. LEXIS
6 Chief Deputy District Attorney
7 Nevada Bar #11064
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

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

JUN 06 2017

BY *Deborah Miller*
DEBORAH MILLER, DEPUTY

C-16-316081-1

ROC
Receipt of Copy
4655818



DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

KEANDRE VALENTINE,
#5090875

Defendant.

CASE NO: C-16-316081-1

DEPT NO: III

RECEIPT OF COPY

LIST OF DISCOVERY ITEMS PROVIDED TO DEFENSE

1. Discovery Bate Stamped 000287-000308
 - a. 000287-000292: Transcript of Taped Interview with Marvin Bass
 - b. 000293-000298: Transcript of Taped Interview with Darrell Faulkner
 - c. 000299-000302: Transcript of Taped Interview with Jordan Alexander
 - d. 000303-000308: Transcript of Taped Interview with Omara McBride
2. Body Camera Footage for LLV160528001116 (1)
3. Body Camera Footage for LLV160528001129 (6)
4. Body Camera Footage for LLV160528001133 (3)
5. Defendant's Video Taped Statement + Smart Client Player
6. Audio of Taped Statement with Marvin Bass
7. Audio of Taped Statement with Darrell Faulkner

1 8. Audio of Taped Statement with Jordan Alexander

2 9. Audio of Taped Statement with Omara McBride

3 10. Photo Line Up by Marvin Bass (3 pages), black and white

4
5 RECEIPT OF COPY of the above and foregoing Discovery is hereby acknowledged
6 this 9th day of June, 2017.

7 TEGAN MACHNICH, ESQ.
8 ATTORNEY FOR DEFENDANT

9 BY 

10 309 S. THIRD STREET #226
11 LAS VEGAS, Nevada 89155

12 Signed with understanding that I have
13 not personally viewed the disc + verified
14 the files are functional.

15 GCU/AL

Edit View Tools Help

Organize > Open with Adobe Reader XI > Print Burn New folder

☆ Favorites

- Desktop
- Downloads
- Recent Places
- GCU cases - Shortcut

- Desktop
- Libraries
- Documents
- Music
- Pictures
- Videos
- Agnes Lexis

Name	Date modified	Type
BC	6/5/2017 4:02 PM	File folder
Valentine Video Taped Statement	6/5/2017 3:26 PM	File folder
Disco 287-308.pdf	6/5/2017 4:15 PM	Adobe Acrobat
160526-2109 Marvin Bass.WMA	6/22/2016 7:35 AM	Windows Media Center
160528-1116 Darrell Faulkner.WMA	6/22/2016 7:35 AM	Windows Media Center
160528-1129 Jordan Alexander.WMA	6/22/2016 7:35 AM	Windows Media Center
160528-1133 Omara McBride.WMA	6/22/2016 7:35 AM	Windows Media Center
Photo Line Up Marvin Bass.pdf	6/5/2017 4:40 PM	Adobe Acrobat

name:
author:
subject:
date:
comment:
being
not be
those
photo
the pl
no att
the pl
other
by oth
can r