1	IN THE SUPREME COU	URT OF THE STATE OF NEVADA
1 2		
3	MATTHEW WASHINGTON,) No. 65998
4	Appellant,	Electronically Filed Jun 02 2015 08:23 a.m.
5	ν.	Jun 02 2015 08:23 a.m.
6	THE STATE OF NEVADA,	Clerk of Supreme Court
7	Respondent.	
8		
9	APPELLANT'S APPE	NDIX VOLUME I PAGES 001-241
10	PHILIP J. KOHN Clark County Public Defender	STEVE WOLFSON Clark County District Attorney
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15	· · · ·	Counsel for Respondent
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i.		
	EUED	
1	JUSTICE COURT, EAS VEGAS TOWNSHIP CLARK COUNTY, NEVADA	
2	Nov 6 1 24 PH THE	
3	THE STATE OF NEVADA.	
4	Plaintiff, BY CASE NO: 13F18022A-B	
5	-vs- DEPUTY DEPT NO: 5	
6	MATTHEW WASHINGTON #2685499, MARTELL MOTEN #1999333,	
7	Defendants. <u>CRIMINAL COMPLAINT</u>	
8		
9	The Defendants above named having committed the crimes of CONSPIRACY TO	
10	COMMIT MURDER (Category B Felony - NRS 199.480, 200.010, 200.030, 193.165);	
11	MURDER WITH USE OF A DEADLY WEAPON, VICTIM 60 YEARS OF AGE OR	
12	OLDER (Category A Felony - NRS 200.010, 200.030, 193.165, 193.167); ATTEMPT	
13	MURDER WITH USE OF A DEADLY WEAPON (Category B Felony - NRS 200.010,	
14	200.030, 193.330, 193.165); BATTERY WITH USE OF A DEADLY WEAPON (Category	
15	B Felony - NRS 200.481) and DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT (Category B Felony - NRS 202.285), in the	
16	a way to the the sold Defendants on or about the 5th day of November.	
17		
18	2013, at and within the County of Clark, State of Nevada,	
19	The second state with DAVID IONES then and there meet with each other	
20	the other wilfully unlawfully, and	
21	is the sum to commit a arime to with murder with use of a deadly	
22 23	, so for a sider and in furtherance of said conspiracy Defendants	
23 24	did commit the acts as set forth in Counts 2-14, said acts being incorporated by this reference	
24	as though fully set forth herein.	ļ
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COUNT 2 - MURDER WITH USE OF A DEADLY WEAPON, VICTIM 60 YEARS OF AGE OR OLDER

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Defendants did then and there wilfully, feloniously, without authority of law, and 3 with premeditation and deliberation, and with malice aforethought, kill NATHAN RAWLS, 4 being 60 years of age or older, a human being, by shooting into the body of the said 5 NATHAN RAWLS, with a deadly weapon, to-wit: a firearm, Defendants MATTHEW 6 WASHINGTON and MARTELL MOTEN, being responsible under one or more of the 7 following principles of criminal liability, to-wit: (1) by having premeditation and 8 deliberation in its commission; and/or (2) the killing occurring during the perpetration or 9 attempted perpetration of burglary and/or robbery and/or kidnapping and/or (3) by aiding or 10 abetting in the commission of the crime by accompanying each other to the crime scene 11 where each acted as lookouts for each other, one or both of the Defendants shooting into the 12 body of NATHAN RAWLS, with a firearm, MATTHEW WASHINGTON and MARTELL 13 MOTEN, encouraging one another throughout by actions and words, the Defendants acting 14 in concert throughout; and/or (4) by Defendants MATTHEW WASHINGTON and 15 MARTELL MOTEN, conspiring with each other to commit murder whereby each is 16 vicariously liable for the acts of the other in furtherance of the conspiracy in its commission. 17 COUNT 3 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON 18

Defendants did then and there, without authority of law, and malice aforethought, 19 willfully and feloniously attempt to kill ASHLEY SCOTT, a human being, by shooting at 20 and into the body of the said ASHLEY SCOTT, with a deadly weapon, to-wit: a firearm, 21 Defendants MATTHEW WASHINGTON and MARTELL MOTEN, being responsible 22 under one or more of the following principles of criminal liability, to-wit: (1) by having 23 premeditation and deliberation in its commission; and/or (2) the killing occurring during the 24 perpetration or attempted perpetration of burglary and/or robbery and/or kidnapping and/or 25 (3) by aiding or abetting in the commission of the crime by accompanying each other to the 26 crime scene where each acted as lookouts for each other, one or both of the Defendants 27 shooting out of a vehicle and at and into the body of ASHLEY SCOTT, with a firearm, 28

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1 Defendants MATTHEW WASHINGTON and MARTELL MOTEN, encouraging one 2 another throughout by actions and words, the Defendants acting in concert throughout; 3 and/or (4) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN, 4 conspiring with each other to commit murder whereby each is vicariously liable for the acts 5 of the other in furtherance of the conspiracy in its commission

6 COUNT 4 - BATTERY WITH USE OF A DEADLY WEAPON

Defendants did then and there wilfully, unlawfully, and feloniously use force or 7 violence upon the person of another, to-wit: ASHLEY SCOTT, with use of a deadly 8 weapon, to-wit: a firearm, shooting at and into the body of the said ASHLEY SCOTT, 9 Defendants MATTHEW WASHINGTON and MARTELL MOTEN, being responsible 10 under one or more of the following principles of criminal liability, to-wit: (1) by having 11 premeditation and deliberation in its commission; and/or (2) the killing occurring during the 12 perpetration or attempted perpetration of burglary and/or robbery and/or kidnapping and/or 13 (3) by aiding or abetting in the commission of the crime by accompanying each other to the 14 crime scene where each acted as lookouts for each other, one or both of the Defendants 15 shooting out of a vehicle and at and into the body of ASHLEY SCOTT, with a firearm, the 16 Defendants encouraging one another throughout by actions and words, Defendants 17 MATTHEW WASHINGTON and MARTELL MOTEN, acting in concert throughout; 18 and/or (4) by Defendants conspiring with each other to commit murder whereby each is 19 vicariously liable for the acts of the other in furtherance of the conspiracy in its commission. 20 COUNT 5 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON 21

Defendants did then and there, without authority of law, and malice aforethought, willfully and feloniously attempt to kill LAROY THOMAS, a human being, by shooting at and into the body of the said LAROY THOMAS, with a deadly weapon, to-wit: a firearm, Defendants MATTHEW WASHINGTON and MARTELL MOTEN, being responsible under one or more of the following principles of criminal liability, to-wit: (1) by having premeditation and deliberation in its commission; and/or (2) the killing occurring during the perpetration or attempted perpetration of burglary and/or robbery and/or kidnapping and/or

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(3) by aiding or abetting in the commission of the crime by accompanying each other to the 1 crime scene where each acted as lookouts for each other, one or both of the Defendants 2 shooting out of a vehicle and at and into the body of the said LAROY THOMAS, with a 3 firearm, Defendants MATTHEW WASHINGTON and MARTELL MOTEN, encouraging 4 one another throughout by actions and words, the Defendants acting in concert throughout; 5 and/or (4) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN, 6 conspiring with each other to commit murder whereby each is vicariously liable for the acts 7 of the other in furtherance of the conspiracy in its commission 8

COUNT 6 - BATTERY WITH USE OF A DEADLY WEAPON

Defendants did then and there wilfully, unlawfully, and feloniously use force or 10 violence upon the person of another, to-wit: LAROY THOMAS, with use of a deadly 11 weapon, to-wit: by shooting at and into the body of the said LAROY THOMAS, with a 12 a firearm, Defendants MATTHEW WASHINGTON and deadly weapon, to-wit: 13 MARTELL MOTEN, being responsible under one or more of the following principles of 14 criminal liability, to-wit: (1) by having premeditation and deliberation in its commission; 15 and/or (2) the killing occurring during the perpetration or attempted perpetration of burglary 16 and/or robbery and/or kidnapping and/or (3) by aiding or abetting in the commission of the 17 crime by accompanying each other to the crime scene where each acted as lookouts for each 18 other, one or both of the Defendants shooting out of a vehicle and at and into the body of 19 LAROY THOMAS, with a firearm, the Defendants encouraging one another throughout by 20 actions and words, Defendants MATTHEW WASHINGTON and MARTELL MOTEN, 21 acting in concert throughout; and/or (4) by Defendants conspiring with each other to commit 22 murder whereby each is vicariously liable for the acts of the other in furtherance of the 23 conspiracy in its commission. 24

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COUNT 7 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON

Defendants did then and there, without authority of law, and malice aforethought, willfully and feloniously attempt to kill MARQUE HILL, a human being, by shooting at and into the body of the said MARQUE HILL, with a deadly weapon, to-wit: a firearm,

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Defendants MATTHEW WASHINGTON and MARTELL MOTEN, being responsible 1 under one or more of the following principles of criminal liability, to-wit: (1) by having 2 premeditation and deliberation in its commission; and/or (2) the killing occurring during the 3 perpetration or attempted perpetration of burglary and/or robbery and/or kidnapping and/or 4 (3) by aiding or abetting in the commission of the crime by accompanying each other to the 5 crime scene where each acted as lookouts for each other, one or both of the Defendants 6 shooting out of a vehicle and at and into the body of MARQUE HILL, with a firearm, 7 Defendants MATTHEW WASHINGTON and MARTELL MOTEN, encouraging one 8 another throughout by actions and words, the Defendants acting in concert throughout; 9 and/or (4) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN, 10 conspiring with each other to commit murder whereby each is vicariously liable for the acts 11 of the other in furtherance of the conspiracy in its commission. 12

13 COUNT 8 - BATTERY WITH USE OF A DEADLY WEAPON

Defendants did then and there wilfully, unlawfully, and feloniously use force or 14 violence upon the person of another, to-wit: MARQUE HILL, with use of a deadly weapon, 15 to-wit: by shooting at and into the body of the said MARQUE HILL, with a deadly weapon, 16 to-wit: a firearm, Defendants MATTHEW WASHINGTON and MARTELL MOTEN, 17 being responsible under one or more of the following principles of criminal liability, to-wit: 18 (1) by having premeditation and deliberation in its commission; and/or (2) the killing 19 occurring during the perpetration or attempted perpetration of burglary and/or robbery and/or 20 and/or (3) by aiding or abetting in the commission of the crime by 21 kidnapping accompanying each other to the crime scene where each acted as lookouts for each other, 22 one or both of the Defendants shooting out of a vehicle and at and into the body of 23 MARQUE HILL, with a firearm, the Defendants encouraging one another throughout by 24 actions and words, Defendants MATTHEW WASHINGTON and MARTELL MOTEN, 25 acting in concert throughout; and/or (4) by Defendants conspiring with each other to commit 26 murder whereby each is vicariously liable for the acts of the other in furtherance of the 27 conspiracy in its commission. 28

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COUNT 9 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, 1 AIRCRAFT, OR WATERCRAFT 2 Defendants did then and there wilfully, unlawfully, maliciously, and feloniously 3 discharge a firearm at or into a structure, said structure, not having been abandoned, located 4 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada. 5 COUNT 10 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, 6 AIRCRAFT, OR WATERCRAFT 7 Defendants did then and there wilfully, unlawfully, maliciously, and feloniously 8 discharge a firearm at or into a structure, said structure, not having been abandoned, located 9 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada. 10 COUNT 11 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, 11 AIRCRAFT, OR WATERCRAFT 12 Defendants did then and there wilfully, unlawfully, maliciously, and feloniously 13 discharge a firearm at or into a structure, said structure, not having been abandoned, located 14 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada. 15 COUNT 12 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, 16 AIRCRAFT, OR WATERCRAFT 17 Defendants did then and there wilfully, unlawfully, maliciously, and feloniously 18 discharge a firearm at or into a structure, said structure, not having been abandoned, located 19 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada. 20 COUNT 13 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, 21 AIRCRAFT, OR WATERCRAFT 22 Defendants did then and there wilfully, unlawfully, maliciously, and feloniously 23 discharge a firearm at or into a structure, said structure, not having been abandoned, located 24 at 2655 Sherwood Street, No. 18, Las Vegas, Clark County, Nevada. 25 26 III27 III28 /// P:\WPDOCS\COMPLT\FCOMP\2013\180\20131802201.DOC 6

COUNT 14 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT Defendants did then and there wilfully, unlawfully, maliciously, and feloniously discharge a firearm at or into a structure, said structure, not having been abandoned, located at 2655 Sherwood Street, No. 18, Las Vegas, Clark County, Nevada. All of which is contrary to the form, force and effect of Statutes in such cases made and provided and against the peace and dignity of the State of Nevada. Said Complainant makes this declaration subject to the penalty of perjury. 11/6/2013 13F18022A-B/rmj LVMPD EV# 1311050479 (TK5)P:\WPDOCS\COMPLT\FCOMP\2013\180\20131802201.DOC

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- 1	JUSTICE COURT, LAS VEGAS TOWNSHIP	
2	CLARK COUNTY, NEVADA FILED IN OPEN	
3	THE STATE OF NEVADA,	
4	Plaintiff,	CASE NO: 13F18022A-B
5	-VS-	DEPT NO: 5
6	MATTHEW WASHINGTON, #2685499 MARTELL MOTEN, #1999333	
7	Defendants.	A M E N D E D CRIMINAL COMPLAINT
8		Hed the original of CONSDIDACY TO
9		committed the crimes of CONSPIRACY TO
10	COMMIT MURDER WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A	
11	CRIMINAL GANG (Category B Felony NRS - 199.480, 200.010, 200.030, 193.168,	
12	193.169); MURDER WITH USE OF A DEADLY WEAPON, WITH THE INTENT TO	
13	PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG (Category A Felony NRS -	
14	200.010, 200.030, 193.168, 193.169); ATTEMPT MURDER WITH USE OF A DEADLY	
15	WEAPON WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL	
16	GANG (Category B Felony NRS - 193.330, 200.010, 200.030, 193.168, 193.169);	
17	BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL	
18	BODILY HARM WITH THE INTENT T	
19		/ NRS - 200.481.2e, 193.168, 193.169);
20		STRUCTURE, VEHICLE, AIRCRAFT, OR
21		D PROMOTE, FURTHER, OR ASSIST A
22		NRS - 202.285, 193.168, 193.169) and
23		N (Category B Felony NRS - 202.360), in the
24	manner following, to-wit: That the said Defe	endants, on or about the 5th day of November,
25	2013, at and within the County of Clark, State	of Nevada,
26	- //	13F18022A ACRM
27	//	Amended Criminal Complaint 3191764 ni i menomini termani tu initi initi initi
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COUNT 1 - CONSPIRACY TO COMMIT MURDER WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 3 unnamed coconspirator, did then and there willfully, unlawfully, feloniously, and knowingly, 4 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 5 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 6 felonious criminal activities other than the conduct which constitutes the primary offense, 7 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 8 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 9 above-said gang, did then and there meet with each other and between themselves and each 10 of them with the other, willfully, unlawfully and feloniously conspire and agree to commit a 11 crime, to-wit: Murder with use of a deadly weapon, and in furtherance of said conspiracy, 12 Defendants MATTHEW WASHINGTON and MARTELL MOTEN did commit the acts as 13 set forth in Counts 2-19, said acts being incorporated by this reference as though fully set 14 forth herein. 15

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<u>COUNT 2</u> - MURDER WITH USE OF A DEADLY WEAPON, WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 18 unnamed coconspirator, did then and there willfully, unlawfully, feloniously, and knowingly, 19 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 20 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 21 felonious criminal activities other than the conduct which constitutes the primary offense, 22 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 23 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 24 above-said gang, did then and there willfully, feloniously, without authority of law, and with 25 premeditation and deliberation, and with malice aforethought, kill NATHAN RAWLS, a 26 human being, by shooting at and into the body of the said NATHAN RAWLS, with a deadly 27 weapon, to-wit: a firearm; the said actions of the Defendants MATTHEW WASHINGTON 28

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and MARTELL MOTEN and an unnamed coconspirator, resulting in the death of the said 1 NATHAN RAWLS, Defendants MATTHEW WASHINGTON and MARTELL MOTEN 2 being responsible under the following principles of criminal liability, to-wit: (1) by directly 3 committing said act, and/or (2) by Defendants MATTHEW WASHINGTON and 4 MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the 5 specific intent that a killing occur, by providing counsel and encouragement and by assisting 6 each other in this crime by accompanying each other to the crime scene where one of more 7 of their member acted as lookouts, as one or more of their member discharged one or more 8 firearms multiple times striking at and into the body of NATHAN RAWLS resulting in the 9 death of the said NATHAN RAWLS, Defendants MATTHEW WASHINGTON and 10 MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately 11 after the shooting, Defendants MATTHEW WASHINGTON and MARTELL MOTEN and 12 the unnamed coconspirator acting in concert throughout, Defendants MATTHEW 13 WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and 14 encouraging each other throughout by words or deeds, and/or (3) Defendants MATTHEW 15 WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with 16 each with the specific intent to commit murder whereby each is vicariously liable for the acts 17 of the other in furtherance of the conspiracy in its commission 18

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COUNT 3 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON WITH THE VINTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 21 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 22 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 23 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 24 felonious criminal activities other than the conduct which constitutes the primary offense, 25 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 26 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 27 above-said gang, did then and there, without authority of law, and malice aforethought, 28

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willfully and feloniously attempt to kill ASHLEY SCOTT, a human being, by shooting at 1 and into the body of the said ASHLEY SCOTT, with a deadly weapon, to-wit: a firearm, 2 Defendants MATTHEW WASHINGTON and MARTELL MOTEN being responsible under 3 one or more of the following principles of criminal liability, to-wit: (1) by directly 4 committing said act, and/or (2) by Defendants MATTHEW WASHINGTON and 5 MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the 6 specific intent that a killing occur, by providing counsel and encouragement and by assisting 7 each other in this crime by accompanying each other to the crime scene where one of more 8 of their member acted as lookouts, as one or more of their member discharged one or more 9 firearms multiple times striking at and into the body of ASHLEY SCOTT, Defendants 10 MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator 11 left the crime together immediately after the shooting, Defendants MATTHEW 12 WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert 13 throughout, Defendants MATTHEW WASHINGTON and MARTELL MOTEN and the 14 unnamed coconspirator counseling and encouraging each other throughout by words or 15 deeds, and/or (3) Defendants MATTHEW WASHINGTON and MARTELL MOTEN and an 16 unnamed coconspirator, conspiring with each other with the specific intent to commit this 17 murder whereby each is vicariously liable for the acts of the other in furtherance of the 18 conspiracy in its commission. 19

20 <u>COUNT 4</u> - BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM WITH THE INTENT TO PROMOTE, FURTHER, OR 21 ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in felonious criminal activities other than the conduct which constitutes the primary offense, and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an unnamed coconspirator, with specific intent to promote, further, or assist the activities of the

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above-said gang, did then and there wilfully, unlawfully, and feloniously use force or 1 violence upon the person of another, to-wit: ASHLEY SCOTT, with use of a deadly 2 weapon, to-wit: a firearm, by shooting at and into the body of the said ASHLEY SCOTT, 3 resulting in substantial bodily harm to the said ASHLEY SCOTT, Defendants MATTHEW 4 WASHINGTON and MARTELL MOTEN, being responsible under one or more of the 5 following principles of criminal liability, to-wit: (1) by directly committing said act, and/or 6 (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed 7 coconspirator, aiding or abetting each other, by providing counsel and encouragement and by 8 assisting each other in this crime by accompanying each other to the crime scene where one 9 of more of their member acted as lookouts, as one or more of their member discharged one 10 or more firearms multiple times striking at and into the body of ASHLEY SCOTT, 11 Defendants MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed 12 coconspirator left the crime together immediately after the shooting, Defendants 13 MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator 14 acting in concert throughout, Defendants MATTHEW WASHINGTON and MARTELL 15 MOTEN and the unnamed coconspirator counseling and encouraging each other throughout 16 by words or deeds, and/or (3) Defendants MATTHEW WASHINGTON and MARTELL 17 MOTEN and an unnamed coconspirator, conspiring with each other to commit this crime 18 whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in 19 its commission. 20

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COUNT 5 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in felonious criminal activities other than the conduct which constitutes the primary offense, and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an

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unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 1 above-said gang, did then and there, without authority of law, and malice aforethought, 2 willfully and feloniously attempt to kill LAROY THOMAS, a human being, by shooting at 3 and into the body of the said LAROY THOMAS, with a deadly weapon, to-wit: a firearm, 4 Defendants MATTHEW WASHINGTON and MARTELL MOTEN being responsible under 5 one or more of the following principles of criminal liability, to-wit: (1) by directly 6 committing said act, and/or (2) by Defendants MATTHEW WASHINGTON and 7 MARTELL MOTEN and/or unnamed coconspirator, aiding or abetting each other, with the 8 specific intent that a killing occur, by providing counsel and encouragement and by assisting 9 each other in this crime by accompanying each other to the crime scene where one of more 10 of their member acted as lookouts, as one or more of their member discharged one or more 11 firearms multiple times striking at and into the body of LAROY THOMAS, Defendants 12 MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator 13 left the crime together immediately after the shooting, Defendants MATTHEW 14 WASHINGTON and MARTELL MOTEN and the unnamed coconspirator acting in concert 15 throughout, Defendants MATTHEW WASHINGTON and MARTELL MOTEN and the 16 unnamed coconspirator counseling and encouraging each other throughout by words or 17 deeds, and/or (3) Defendants MATTHEW WASHINGTON and MARTELL MOTEN and an 18 unnamed coconspirator, conspiring with each other with the specific intent to commit this 19 murder whereby each is vicariously liable for the acts of the other in furtherance of the 20 conspiracy in its commission. 21

 22 COUNT 6 - BATTERY WITH USE OF A DEADLY WEAPON RESULTING IN SUBSTANTIAL BODILY HARM WITH THE INTENT TO PROMOTE, FURTHER, OR
 23 ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in felonious criminal activities other than the conduct which constitutes the primary offense,

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and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 1 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 2 above-said gang, did then and there wilfully, unlawfully, and feloniously use force or 3 violence upon the person of another, to-wit: LAROY THOMAS, with use of a deadly 4 weapon, to-wit: a firearm, by shooting at and into the body of the said LAROY THOMAS, 5 resulting in substantial bodily harm to the said LAROY THOMAS, Defendants MATTHEW 6 WASHINGTON and MARTELL MOTEN, being responsible under one or more of the 7 following principles of criminal liability, to-wit: (1) by directly committing said act, and/or 8 (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN and/or unnamed 9 coconspirator, aiding or abetting each other, by providing counsel and encouragement and by 10 assisting each other in this crime by accompanying each other to the crime scene where one 11 of more of their member acted as lookouts, as one or more of their member discharged one 12 or more firearms multiple times striking at and into the body of LAROY THOMAS, 13 Defendants MATTHEW WASHINGTON and MARTELL MOTEN and/or an unnamed 14 coconspirator left the crime together immediately after the shooting, Defendants 15 MATTHEW WASHINGTON and MARTELL MOTEN and the unnamed coconspirator 16 acting in concert throughout, Defendants MATTHEW WASHINGTON and MARTELL 17 MOTEN and the unnamed coconspirator counseling and encouraging each other throughout 18 by words or deeds, and/or (3) Defendants MATTHEW WASHINGTON and MARTELL 19 MOTEN and an unnamed coconspirator, conspiring with each other to commit this crime 20 whereby each is vicariously liable for the acts of the other in furtherance of the conspiracy in 21 its commission. 22

COUNT 7 - ATTEMPT MURDER WITH USE OF A DEADLY WEAPON WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG 24

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Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 25 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 26 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 27 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 28

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felonious criminal activities other than the conduct which constitutes the primary offense, 1 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 2 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 3 above-said gang, did then and there, without authority of law, and malice aforethought, 4 willfully and feloniously attempt to kill MARQUE HILL, a human being, by shooting at the 5 body of the said MARQUE HILL, with a deadly weapon, to-wit: a firearm, Defendants 6 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 7 more of the following principles of criminal liability, to-wit: (1) by directly committing said 8 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 9 and/or unnamed coconspirator, aiding or abetting each other, with the specific intent that a 10 killing occur, by providing counsel and encouragement and by assisting each other in this 11 crime by accompanying each other to the crime scene where one of more of their member 12 acted as lookouts, as one or more of their member discharged one or more firearms multiple 13 times at the body of MARQUE HILL, Defendants MATTHEW WASHINGTON and 14 MARTELL MOTEN and/or an unnamed coconspirator left the crime together immediately 15 after the shooting, Defendants MATTHEW WASHINGTON and MARTELL MOTEN and 16 the unnamed coconspirator acting in concert throughout, Defendants MATTHEW 17 WASHINGTON and MARTELL MOTEN and the unnamed coconspirator counseling and 18 encouraging each other throughout by words or deeds, and/or (3) Defendants MATTHEW 19 WASHINGTON and MARTELL MOTEN and an unnamed coconspirator, conspiring with 20 each other with the specific intent to commit murder whereby each is vicariously liable for 21 the acts of the other in furtherance of the conspiracy in its commission. 22

 23 <u>COUNT 8</u> - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR
 24 ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in

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felonious criminal activities other than the conduct which constitutes the primary offense, 1 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 2 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 3 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 4 discharge a firearm at or into a structure, said structure, not having been abandoned, located 5 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 6 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 7 more of the following principles of criminal liability, to-wit: (1) by directly committing said 8 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 9 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 10 with the intent to commit this crime by accompanying each other to the crime scene where 11 one of more of their member acted as lookouts, as one or more of their member discharged 12 one or more firearms multiple times at or into a structure, Defendants MATTHEW 13 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 14 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 15 MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) 16 pursuant to a conspiracy to commit this crime. 17

 18 COUNT 9 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR
 19 ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 20 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 21 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 22 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 23 felonious criminal activities other than the conduct which constitutes the primary offense, 24 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 25 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 26 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 27 discharge a firearm at or into a structure, said structure, not having been abandoned, located 28

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at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 1 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 2 more of the following principles of criminal liability, to-wit: (1) by directly committing said 3 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 4 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 5 with the intent to commit this crime by accompanying each other to the crime scene where 6 one of more of their member acted as lookouts, as one or more of their member discharged 7 one or more firearms multiple times at or into a structure, Defendants MATTHEW 8 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 9 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 10 MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) 11 pursuant to a conspiracy to commit this crime. 12

 13 <u>COUNT 10</u> - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR
 14 ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 15 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 16 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 17 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 18 felonious criminal activities other than the conduct which constitutes the primary offense, 19 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 20 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 21 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 22 discharge a firearm at or into a structure, said structure, not having been abandoned, located 23 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 24 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 25 more of the following principles of criminal liability, to-wit: (1) by directly committing said 26 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 27 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 28

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with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged 2 one or more firearms multiple times at or into a structure, Defendants MATTHEW 3 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 4 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 5 MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) 6 pursuant to a conspiracy to commit this crime. 7

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COUNT 11 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, RAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 10 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 11 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 12 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 13 felonious criminal activities other than the conduct which constitutes the primary offense, 14 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 15 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 16 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 17 discharge a firearm at or into a structure, said structure, not having been abandoned, located 18 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 19 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 20 more of the following principles of criminal liability, to-wit: (1) by directly committing said 21 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 22 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 23 with the intent to commit this crime by accompanying each other to the crime scene where 24 one of more of their member acted as lookouts, as one or more of their member discharged 25 one or more firearms multiple times at or into a structure, Defendants MATTHEW 26 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 27 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 28

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

COUNT 12 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 5 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 6 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 7 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 8 felonious criminal activities other than the conduct which constitutes the primary offense, 9 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 10 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 11 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 12 discharge a firearm at or into a structure, said structure, not having been abandoned, located 13 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 14 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 15 more of the following principles of criminal liability, to-wit: (1) by directly committing said 16 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 17 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 18 with the intent to commit this crime by accompanying each other to the crime scene where 19 one of more of their member acted as lookouts, as one or more of their member discharged 20 one or more firearms multiple times at or into a structure, Defendants MATTHEW 21 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 22 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 23 MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) 24 pursuant to a conspiracy to commit this crime. 25

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COUNT 13 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

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Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 3 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 4 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 5 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 6 felonious criminal activities other than the conduct which constitutes the primary offense, 7 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 8 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 9 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 10 discharge a firearm at or into a structure, said structure, not having been abandoned, located 11 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 12 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 13 more of the following principles of criminal liability, to-wit: (1) by directly committing said 14 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 15 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 16 with the intent to commit this crime by accompanying each other to the crime scene where 17 one of more of their member acted as lookouts, as one or more of their member discharged 18 one or more firearms multiple times at or into a structure, Defendants MATTHEW 19 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 20 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 21 MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) 22 pursuant to a conspiracy to commit this crime. 23

 24 <u>COUNT 14</u> - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR
 25 ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING

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60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 1 2 felonious criminal activities other than the conduct which constitutes the primary offense, and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 3 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 4 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 5 discharge a firearm at or into a structure, said structure, not having been abandoned, located 6 at 2655 Sherwood Street. Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 7 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 8 more of the following principles of criminal liability, to-wit: (1) by directly committing said 9 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 10 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 11 with the intent to commit this crime by accompanying each other to the crime scene where 12 one of more of their member acted as lookouts, as one or more of their member discharged 13 one or more firearms multiple times at or into a structure, Defendants MATTHEW 14 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 15 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 16 MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) 17 pursuant to a conspiracy to commit this crime. 18

 19 <u>COUNT 15</u> - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 21 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 22 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 23 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 24 felonious criminal activities other than the conduct which constitutes the primary offense, 25 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 26 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 27 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 28

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discharge a firearm at or into a structure, said structure, not having been abandoned, located 1 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 2 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 3 more of the following principles of criminal liability, to-wit: (1) by directly committing said 4 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 5 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 6 with the intent to commit this crime by accompanying each other to the crime scene where 7 one of more of their member acted as lookouts, as one or more of their member discharged 8 one or more firearms multiple times at or into a structure, Defendants MATTHEW 9 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 10 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 11 MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) 12 pursuant to a conspiracy to commit this crime. 13

14 <u>COUNT 16</u> - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR ASSIST A CRIMINAL GANG

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 16 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 17 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 18 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 19 felonious criminal activities other than the conduct which constitutes the primary offense, 20 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 21 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 22 above-said gang, did then and there wilfully, unlawfully, maliciously, and feloniously 23 discharge a firearm at or into a structure, said structure, not having been abandoned, located 24 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 25 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 26 more of the following principles of criminal liability, to-wit: (1) by directly committing said 27 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 28

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and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime with the intent to commit this crime by accompanying each other to the crime scene where one of more of their member acted as lookouts, as one or more of their member discharged 3 one or more firearms multiple times at or into a structure, Defendants MATTHEW 4 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 5 together immediately after the shooting, Defendants MATTHEW WASHINGTON and 6 MARTELL MOTEN and the unnamed coconspirator acting in concert throughout, and/or (3) 7 pursuant to a conspiracy to commit this crime. 8

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COUNT 17 - DISCHARGING FIREARM AT OR INTO STRUCTURE, VEHICLE, AIRCRAFT, OR WATERCRAFT WITH THE INTENT TO PROMOTE, FURTHER, OR 9 ASSIST A CRIMINAL GANG 10

Defendants MATTHEW WASHINGTON and MARTELL MOTEN along with an 11 unnamed coconspirator did then and there willfully, unlawfully, feloniously, and knowingly, 12 for the benefit of, at the direction of, or in affiliation with a criminal gang, to-wit: ROLLING 13 60s CRIPS and/or SQUAD UP, which has as one of its common activities engaging in 14 felonious criminal activities other than the conduct which constitutes the primary offense, 15 and Defendants MATTHEW WASHINGTON and MARTELL MOTEN, along with an 16 unnamed coconspirator, with specific intent to promote, further, or assist the activities of the 17 above-said gang, did then and there willfully, unlawfully, maliciously, and feloniously 18 discharge a firearm at or into a structure, said structure, not having been abandoned, located 19 at 2655 Sherwood Street, Apartment No. 18, Las Vegas, Clark County, Nevada, Defendants 20 MATTHEW WASHINGTON and MARTELL MOTEN being responsible under one or 21 more of the following principles of criminal liability, to-wit: (1) by directly committing said 22 act, and/or (2) by Defendants MATTHEW WASHINGTON and MARTELL MOTEN 23 and/or unnamed coconspirator, aiding or abetting each other in the commission of this crime 24 with the intent to commit this crime by accompanying each other to the crime scene where 25 one of more of their member acted as lookouts, as one or more of their member discharged 26 one or more firearms multiple times at or into a structure, Defendants MATTHEW 27 WASHINGTON and MARTELL MOTEN and/or an unnamed coconspirator left the crime 28

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1	CASE NO. C294695-1 and C294695-2	
2	DEPT. NO. 5	
3	THE THEFTOE COURT OF INS VEGAS TOWNSHIP	
4	IN THE JUSTICE COURT OF LAS VEGAS THE WINSTEAL Filed COUNTY OF CLARK, STATE OF NEOY/49/2014 01:48:50 PM	
- 5-		
6	Atim N. Shum	
7	THE STATE OF NEVADA,) CLERK OF THE COURT	
8	Plaintiff,)	
9	vs.) Case No.) 13F18022A-B	
10	MATTHEW WASHINGTON,) MARTELL MOTEN,) Defendants.)	
11		
12	REPORTER'S TRANSCRIPT	
13	OF PRELIMINARY HEARING	
14	BEFORE THE HONORABLE CYNTHIA CRUZ	
15	JUSTICE OF THE PEACE	
16	TAKEN ON THURSDAY, December 5, 2013 AT 10:00 A.M.	
17		
18		
19	APPEARANCES:	
20	For the State: Danielle Pieper, Esq.	
21	For the State: Danielle Pieper, Esq. Chief Deputy District Attorney	
22		
23	For the Defendant: David Otto, Esq. Joel Mann, Esq.	
24	Las Vegas, Nevada	
25	REPORTED BY: ROBERT A. CANGEMI, CCR No. 888	

. 1	LAS VEGAS, NEVADA, THURSDAY, DECEMBER 5, 2013
2	* * * *
3	
4	THE COURT: Okay.
5	Let's get on the record. Matthew the
6	Washington and Martell Moten, 13F18022A and B.
7	Mr. Washington is present with the
8	assistance of the counsel, as well as Mr. Moten is
9	present with the assistance of counsel.
10	They are both in custody.
1 1	Ready to proceed?
12	MR. MANN: Good morning, Your Honor, Joel
13	Mann appearing for Martell Moten.
14	MR. OTTO: David Otto on behalf of
15	Mr. Washington.
16	THE COURT: Mr. Mann and Mr. Otto, are we
17	ready to proceed at this particular time?
18	MR. MANN: Yes.
19	MR. OTTO: I would like to make a record
20	regarding my desire for a continuance.
21	I have been in, I might say in constant
22	communication with the State's attorney, Ms. Pieper
23	regarding several things.
24	One is the fact that we do not have a
25	transcript of statements made by Mr. Moten. We only
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have video, which is about 8 hours long. 1 Without the transcript it is difficult for 2 me to attack, if you will, or impeach the veracity 3 of what is being said about what was being said. 4 I doubt Mr. Moten will be testifying today. 5 And also, just up front, I am going to make a Gruton 6 objection to any statements by Mr. Moten coming in 7 against Mr. Washington, 8 THE COURT: Let me get this straight, your 9. objection is, is that you don't have the 10 co-Defendant's statement. 11 MR. OTTO: Which implicates my client. 12 THE COURT: Which underneath Gruton that 13 this Court would not be able to consider, nor would 14the Court consider against your client. 15 I will be realistic, Mr. Otto, the statute 16 says you are entitled to your client's statement; do 17 you have your client's statement? 18 MR. OTTO: I do, yes. 19 THE COURT: Let me hear from Mr. Mann 20 regarding this, because I will be honest, before we 21 have that you guys wanted to push this, and keep the 22 15 days, but you are the ones -- Mr. Otto, you are 23 asking for a continuance. 24 Mr. Mann, where are you at? 25

MR. MANN: Good morning, Your Honor. 1 I do not have Mr. Moten's transcripts. I 2 have reviewed his recorded statement, and I have 3 discussed that with Mr. Moten. 4 He desires to continue to go forward. 5 Regarding the Gruton issue, any statements 6 from the co-Defendant to come in against my client, 7 I would strongly object against as a Gruton 8 violation. 9 I would ask Your Honor to not consider 10 that. But Mr. Moten would like to still go forward 11 today. 12 THE COURT: All right. 13 So, Mr. Mann, like I said, any statements 14 that Mr. Washington may have made that are 15 incriminating to Mr. Moten, I am certainly not going 16 to impugn on to him. That would be a Gruton 17 violation. 18 I wouldn't be able to do that. All right. 19 So, Mr. Otto, it looks like if that's the only 20 thing, I am going to proceed forward. 21 You still be able to question people 22 appropriately. 23 Any other motions from the defense at this 24 particular time? 25

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MR. OTTO: I would ask that everybody who 1 may become a witness in this hearing today, or in 2 the trial of the future, that may occur in the 3 future, be excluded from the courtroom because 4 THE COURT: You are invoking the 5 exclusionary rule? 6 MR. OTTO: For both called witnesses and 7 uncalled witnesses, because it is a gang case; any 8 associate of these gentlemen may be called in as 9 witnesses at a trial. 10 THE COURT: This is generally how I handle 11 this; basically I have got a lot of family in the 12 courtroom, family and friends. 13 What I usually tell my defense attorneys, 14 and State is the same way, if it looks like there 15 could be anybody called potentially in the future, 16 that is here, that could be a defense witness, it is 17 only beneficial and helpful for both Mr. Moten and 18 Mr. Washington that they not stay in the courtroom, 19 because then they would never be able to be called. 20 Usually what I do usually is I tell 21 everybody to see if there anybody that you could 22 possibly think that you are going to be calling down 23 the road with everybody's family. 24 MS. PIEPER: Judge, can we approach 25

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1	briefly?
2	THE COURT: Sure.
3	
4	(a bench conference was had.)
5	
6	THE COURT: Gentlemen, no secrets at the
7	bench, I more that I usually have concerns that I
8	want everybody to make sure it looks like your
9	attorneys could have some concerns based upon how
10	things transpire today, that they might need to call
11	some potential friends and family that could be in
12	the courtroom today.
13	So I don't want to deprive you guys of ever
14	having a witness that could be available. I am
15	going to have your attorneys talk to the family, and
16	ask the friends and family to exit the courtroom.
17	I don't want it to be a situation where they
18	stay in here, and suddenly this case gets up in
.19	District Court, and they need to call somebody, and
20	because they sat in here, that they could never be
21	called.
22	Gentlemen, if you want to talk to the
23	friends and family and ask quick questions, I will
24	give you 5 minutes out in the hallway.
25	Family and friends, I will you step outside

and speak with your respective attorneys, however 1 you are here with as to what is going on. 2 I think they might have the anticipation 3 that they might need to call some people in the 4 future, so why don't you talk to everybody out in 5 the hallway. 6 I will give you a quick 5 minutes. 7 8 (Recess taken.) 9 10 THE COURT: Are you done chatting with 11 family? 12 MR. MANN: Yes. 13 MR. OTTO: I am finished chatting with the 14 family. 15 2 or 3 may want to come in and maybe they 16 will never be witnesses. It will be up to the 17 Court, of course. 18 THE COURT: Let's get Ms. Pieper back in 19 20 here. MS. PIEPER: Judge, can we approach? 21 22 (A bench conference was had.) 23 24 THE COURT: All right. 25
I have joint requests from the attorneys to 1 seal the courtroom based upon what the nature of the 2 proceedings are. 3 I am going to, for the first witness, seal 4 the courtroom for the first witness. 5 Based upon how I think things are, going I 6 will allow our 4 family members back in that we are 7 having after the first witness. 8 I will watch kind of what is going on with 9 everybody's demeanor. 10 If it looks like I get a renewed motion from 11 counsel to seal it, then I will seal it for the rest 12 of the proceedings. 13 Family, I am going to ask just for my first 14 witness that you step out. Amber will come get you 15 after the first witness. 16 If I see people opening the doors, I will 17 take it you can't follow my rule, and I will seal it 18 permanently. 19 Okay, everybody? 20 All right. 21 State call your first witness. 22 MS. PIEPER: The State calls Lorraine 23 24 Desoto. THE CLERK: Please be seated. 25

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1	Please state your name and spell it for the
2	record.
3	THE COURT: Just so everybody knows, my
4	staff has been going before 8:00, so, we will go as
. 5	far as we can to noon.
6	We will take a break, and then we will be
7	reconvening to 6-A, because I lose the courtroom.
8	MS. PIEPER: I didn't tell both attorneys
9	this, I think I am going to call 10, 11 witnesses.
10	I have several witnesses here, and then the
11	rest of my witnesses, 5 or 6 of them will be coming
. 12	in the afternoon.
13	I didn't think it was prudent to have
14	everyone sit here since 10:00 o'clock.
15	
16	LORRAINE DESOTO,
17	
18	who, being first duly sworn to tell the truth, the
19	whole truth, and nothing but the truth, was examined
20	and testified as follows:
21	
22	THE CLERK: Please be seated.
23 -	Please state your name and spell for the
24	record.
25	THE WITNESS: Lorraine Desoto,

L-o-r-r-a-i-n-e D-e-s-o-t-o. 1 MR. MANN: Your Honor, can I have my 2 client's right hand? 3 THE COURT: No, that's jail policy. 4 No. 5 MR. OTTO: For the record, he cannot write 6 7 notes? THE COURT: I understand. Unfortunately, 8 nothing against your client, it has been broadcast 9 that you get a clip board. 10 MR. OTTO: Get 2. 11 THE COURT: It has been written policy that 12 we are not to do that at all. 13 They will get you clip boards so they can 14 15 write. All right. 16 Mr. Pieper, you may proceed. 17 MS. PIEPER: Thank you. 18 19 20 DIRECT EXAMINATION 21 22 BY MS. PIEPER: 23 Q. Ms. Desoto, I want to draw your attention to 24 the November 5, 2013. 25

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Were you in the area of 2665 Sherwood, Clark 1 County, Nevada? 2 Α. Yes. 3 Approximately 4:34 in will morning, did you 4 Q. hear something that woke you up? 5 Gunfire. Α. 6 Gunshots, correct? Q. 7 Yes. Α. 8 How many gunshots did you hear Q. 9 approximately? 10 5. Α. 11 Once you heard the gunshots, what happened Q. 12 next? 13 I got up out of bed, got dressed, and looked 14 Α. out a window, and saw a vehicle. 15 Q. When you say you looked out of the window, 16 did you look out of the front of your apartment or 17 the back of your apartment? 18 A. The side. 19 The side. ο. 20 The side of your apartment, when you look 21 out that window, what does it face, is it a street? 22 An alley. Α. 23 And can cars sit in that alleyway? Q. 24 Yes. Α. 25

Can people also walk through that alleyway? 1 0. 2 Α. Yes. Are there gates that block people from going 3 Ο. in and out of that alleyway? 4 Α. Yes. 5 You looked out the side window and you saw a Ο. 6 vehicle; can you describe for us what type of 7 vehicle you saw? 8 A silver Magnum. Α. 9 A silver Dodge Magnum? Q. 10 Yes. Α. 11 And you saw that vehicle; did you see the 12 Q. vehicle moving off and on; what do you remember? 13 The vehicle was in movement. Α. 14 And can you describe what direction the Q. 15 vehicle was going? 16 The vehicle was heading west. Α. 17 Can you give us the major cross street, or Q. 18 the area if, it was going west what it was going 19 toward? 20 It would have been the heading towards Van Α. 21 Patten. 22 What are the major cross streets where 23 Q. Sherwood is? 24 Karen and Sahara. Α. 25

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Did you see the car; did you stand there and Q. 1 see the car totally move, or did you just see the 2 car, you saw movement and then called 911? 3 I saw the car totally move. 4 Α. Once you saw the car move, is that when you Ο. 5 called 911? 6 Α. Yes. 7 You called 911 and relayed the information Q. 8 of what you heard? 9 MR. MANN: Objection, leading. 10 What happened when you called 911? 11 0. I told them that we just heard 5 gunshots, 12 Α. and there was a vehicle leaving the area. 13 Did you describe for the dispatcher what 0. 14 type of vehicle that you saw? 15 Yes. Α. 16 What happened next? Q. 17 The police showed up. Α. 18 The police showed up at your house, and did Q. 19 you speak to the police? 20 Yes. Α. 21 Was it marked patrol officers, a marked car? Q. 2.2 Yes. Α. 23 I don't know if they are in uniform? 24 Q. Yes. Α. 25

Q. I don't know if they were brown 1 uniforms or the uniforms that you see here 2 today. 3 I couldn't answer that, no idea. Α. 4 Q. Once you met up with the police, you 5 spoke to them, correct? 6 Yes. Α. 7 What did you tell them? Q. 8 The same thing I told the dispatch. 9 Α. Eventually were you taken to another 10 Q. 11 location? Yes. 12 Α. What location were you taken to? 13 Q. Somewhere by Fremont Street. 14 Α. Q. And once you got to that location, 15were you asked to look at a vehicle? 16 Α. Yes. 17 MS. PIEPER: Your Honor, may I 18 approach the witness? 19 THE COURT: You may. 20 Q. Showing you what has been marked as 21 State's Proposed 15, do you recognize that 22 vehicle? 23 24 Α. Yes. Minus the orange seals that you see 25 Q.

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1 on vehicle, is that the same vehicle that you 2 saw on November 5, 2013? A. Yes, that's the vehicle that I saw in 3 4 the alleyway. MS. PIEPER: Your Honor, the State 5 6 moves for the admission of 15. MR. OTTO: No objection. 7 MR. MANN: None, Your Honor. 8 THE COURT: It will deemed admitted 9 10 for purposes of preliminary hearing. It was 15? 11 MS. PIEPER: correct. 12 Q. After you went down and saw the 13 14 vehicle, did you then sort of fill out a statement, and then were you eventually 15 interviewed by police officers? 16 A. Yes. 17 Q. You are here pursuant to subpoena, 18 correct? 19 A. Yes. 2.0 Q. And there is an explaining on that 21 subpoena that if you do not show up, there 22 are other means by which the State of Nevada 23 can bring you to Court? 24 A. Yes. 25

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You do not want to be here? Q. 1 I do not. 2 Α. MS. PIEPER: Thank you. 3 No further questions. 4 THE COURT: All right. 5_ We will start off with Mr. Otto, 6 since you are representing Mr. Washington, 7 the A Defendant, I will let you cross first. 8 MR. OTTO: No questions. 9 THE COURT: Mr. Mann. 10 11 CROSS-EXAMINATION 12 13 BY MR. MANN: 14 Q. Ms. Desoto, so how long have you 15 lived at that location? 16 A. 6 months, roughly. 17 Who do you live there were? 18 Q. My husband and my daughter. 19 Α. And is this an upstairs or a 20 Q. downstairs apartment? 21 A. Downstairs. 22 And, so, when you saw the car, were Q. 23 you looking straight at it; were you looking 24 25 to the side; where was the car when you

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looked out the window? 1 Directly even with my window. Α. 2 You said it was in movement? Q. 3 Correct. Α. 4 It was driving past your window? ο. 5 Α. Yes. 6 Was there a car parked in a parking spot in 7 Q. front of your window? 8 Possibly, because I know one parks there. Α. 9 Otherwise I don't recall. 10 Q. Okay. 11 And you heard these gunshots, and then 12 that's when you got up, correct? 13 That's correct. Α. 14 That's what woke me up. 15 You weren't up before you heard the Q. 16 gunshots? 17 Α. NO. 18 Is was the gunshots that woke you up, that Ο. 19 caused you to get out of bed? 20 A. Correct. 21 You heard 5 gunshots, correct? 22 Q. Α, Correct. 23 And when you heard these 5 gunshots, you Q. 24 didn't go directly to the window. Did you? 25

No. Ά. 1 You went to go put on your jeans? 2 0. Yes. Ά, 3 And put on a top? 4 Q.. Α. Yes. 5 Did you put on shoes? Q. 6 Not at that time, no. 7 Α. Okay. Q. 8 After you put on jeans and a top, anything 9 else; is that a no? 10 No. Α. 11 After you put on jeans and a top, that's Q . 12 when you went to the window? 13 A. Correct. 14 Q. Okay. 15 And that window that you went to, is that in 16 the bedroom or out of the bedroom? 17 In. Α. 18 So your bedroom has how many windows in it? 19 Q. One. Α, 20 That window faces west, towards the Q., 21 alleyway, is that correct? 22 No. Ά. 23 What direction did that window face? 24 Q. It faces north. 25 Ά.

1 Q. North, okay. 2 MR. MANN: Court's indulgence. Can I have this marked, Your Honor? 3 If I may approach with Defendant Moten's 4 Exhibit A? 5 You may. THE COURT: 6 7 MR. MANN: Thank you. Ms. Desoto do you see this picture? Q. 8 9 Α. Yes. Do you recognize what that picture is? 10 Ο. It is an aerial view of where I was living. 11 Α, Can you identify the area that you -- or the 12 Q. area that you would indicate your apartment was? 13 14 MS. PIEPER: Do you want her to draw? MR. MANN: I will do that. 15 From aerial, not a clue. 16 Α. Not a clue from aerial? 17 ο. No. 18 Α. THE COURT: I will let the attorneys 19 20 approach so they can watch what she's doing. 21 Hold on. MR. MANN: Right now she hasn't been able to 22 23 identify anything. THE COURT: Okay. 24 So you don't know where your apartment is 25 Q.

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from this aerial view? 1 Α. No. 2 Do you have an idea where Sherwood Street Q. 3 is? 4 Α. Yes. 5 6 Q. Okay. And is your apartment off of Sherwood 7 Street? 8 Α. Yes. 9 Q. And do you see an alleyway that would be 10 indicative of the alleyway that your apartment 11 looked out to? 12 A. It would be this back here. 13 Q. Now, do you know how close to Karen Avenue 14 your apartment is? 15 MS. PIEPER: Judge, I don't mean to 16 interrupt, which I just did, but for the record, the 17 witness just said this one right here. 18 If we could just have her with a black line 19 draw this one right here, so that the record shows 20 what this one right here is. 21 Q. I want to you to write up here alley, so we 22 know that's what that line was. 23 And then can you also mark with an arrow 24 indicating that -- then you had previously 25

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1	indicated Sherwood Street; can you draw a line, and
2	mark with an arrow where Sherwood Street is?
3	A. (Indicating.)
4	Q. Now, knowing now where the alley is, and
. 5.	where Sherwood Street is, can you identify where
6	your apartment might be in this aerial view?
7	A. NO.
8	Q. At least the building that it may be in?
9	A. (Indicating.) The side one, not the main
10	one, one of the side ones.
11	Q. Okay.
12	So can you then are you saying it is
13	either this building or that building, is that
14	correct?
15	A. It would be this alley.
16	Q. Can you go ahead and circle that area, that
17	that is the alley that you believe that your
18	apartment faces.
19	. You are not sure which building it is, but
20	you believe it is that alley, correct?
21	A. Yeah.
22	Q. All right.
23	And was it this alley that you were looking
24	out on to on that night?
25	A. Yes.

So can you then draw another line from that 1 Q . circle and indicate that that is the alley that your 2 apartment looks out to? 3 MS. PIEPER: Just a suggestion, maybe she 4 can put bedroom window alley. 5 MR. MANN: That sounds good. 6 MS, PIEPER: I am not trying to tell her how 7 to testify. 8 I am trying to make sure we can remember 9 this a year from now. 10 11 Q. All right. And it was from -- can you indicate, does 12 your bedroom window face specifically north? 13 Α. Yes. 14 So would you agree that it faces towards 15 Q. 16 this other building? Α. Yes. 17And you are just not sure if it is building 18 Q. 1 or building 2 that you circled? 19 Α, Right. 20 MS. PIEPER: Judge, for the record she used $21 \cdot$ uh-huh, that's a yes? 22 · A. Sorry. 23 Q. You do believe that it is this building 24 here? 25

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1 Α. Yes. 2 Q. Circle that as well? The whole building? 3 Α. Ms. Pieper is saying maybe we should Q. 4 5 put an X through it, but I would like a smaller circle right here. 6 Then draw a line up here saying you 7 believe that is your apartment building. 8 Q. Perfect. Thank you. 9 MR. MANN: All right. 10 So at this time, Your Honor, I would 11 like to admit Defendant's Exhibit A. 12 13 MS. PIEPER: No objection. MR. OTTO: No objection. I want to 14 ask a question. 15 THE COURT: Wait a minute. You have 16 got to wait for your turn. 17 MR. OTTO: It is just the drawing 18 might change. 19 THE COURT: Mr. Otto, you have to 20 wait for your turn, otherwise my record is 21 22 horrible. THE COURT: Defendant Moten Proposed A 23 is deemed admitted. 24 All right, Mr. Mann. 25

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O. All right. 1 So when you saw the vehicle, you believe 2 that you are in this apartment building that you 3 circled? 4 Yes. Α. 5 The smaller circle? Ο. 6 MS. PIEPER: Just for the record --7 Yes. Α. 8 And that the window that you were looking 9 Q. out of faced towards the other building, correct? 10 Correct. Α. 11 And when you observed the car driving, can Ö. 12 you identify where you observed that car? 13 On this map, can you identify where you saw 14 that car? 15 Right there. Α. 16 I ask you to mark it with an X and draw a 17 Q. line from that X indicating car. 18 Okay. Α. 19 All right. 20 Q, And in what direction was that car driving? 21 West. Α. 22 23 Q. Okay. Can you then from that X indicate an arrow 24 of the direction that you saw that car driving? 25

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An arrow, please. 1 (Indicating.) Α. 2 All right. Q. 3 So on this aerial map, it looks like that 4 alleyway that you indicated was a short alleyway 5 that ended behind the block of apartments, is that 6 correct? 7 Correct. Α. 8 Did you see the car turn? Q. 9 No. Α. 10 Did you see car do anything other than drive 11 Q. by your window? 12 Νo. Α. 13 How fast was the car moving? Q. 14 Not at an un-normal rate of speed. Α. 15 So there was nothing unusual about the pace Q. 16 of the car? 17 Nothing. Α. 18 And from the direction that the car was Ο. 19 driving, what would that indicate to you that it was 20 coming from? 21 MS. PIEPER: Objection, speculation. 22 MR. MANN: Your Honor, I think a normal 23 person can make that assumption. 24 There we go, speculation and MS. PIEPER: 25

assumption. 1 THE COURT: I will overrule it. let me hear 2 what she has to say. 3 I would answer that I have no idea. Α. 4 Thank you. 5 Q. And the observation that you made, was 6 anyone with you when you made that observation? 7 Α. Yes. 8 Who else was with you? Q. 9 My husband. 10 Α. Was he standing next to you? . Q. 11 No. He actually he was up before I was, and Α. 12 viewed the vehicle before I did from a different 13 14 window. Okay. 15 Q. Did you see him view that window, or is that 16 based on a conversation that you had wit him? 17 That's what he told me. Α. 18 And is that other window that you believe ο. 19 that he viewed from in your bedroom? 20 A NO. 21 Okay. Q. 22 What room is that window in? 23 The dinning room. Α. 24 And did you see that car driving any or Q . 25

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time? 1 2 Α, No. And you heard the gunshots, the 5 gunshots? 3 Q. Yes. 4 Α. That's when you got up and got dressed, and 5 Q. then looked out of the window? 6 Correct. Α. 7 MR. MANN: Court's indulgence. 8 Your Honor, if I may take the exhibit to 9 show my client, he was unable to see what she was 10 drawing. 11 THE COURT: Sure. 12 MR. MANN: Thank you. 13 I am just going to go leave this up here, 14 and go back to my desk to continue on with 15 questioning. 16 THE COURT: Okay. 17 Ms. Desoto, did you see anyone get in the Q. 18 car? 19 No. A. 20 Did you see the occupants of the car? Q. 21 Α, Ňо. 22 Had you seen the car before? Q. 23 Ňо. 24 Α. When you saw the vehicle, how long was that ο. 25

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1	before your husband saw the vehicle how long was
2	that after your husband had seen the vehicle, if you
3	know?
- 4	A. I have no idea.
5	Q. Before you talked to the police that day,
. 6	did you and your husband have a conversation?
7	A. NO.
8	Q. So you and your husband hear gunshots, and
9	both of you look out windows, separate windows, but
10	you don't have conversation about what you saw?
. 11	A. As soon as he looked out the window, he went
12	out the front door.
13	He wasn't even in the house when I was on
14	the phone with the police.
15	The only thing I said to him is; that was a
16	Magnum, correct; he said yes.
. 17	Q. At the time the car you saw, you speculated
18	that it was a Magnum, but you didn't know for sure?
19	A. NO.
20	Q. Okay.
21	And it was your discussion with your husband
22	that confirmed what you believed?
23	A. Yes.
24	Q. And when you had that conversation with him,
25	had the police arrived yet?

No. А 1 How long after you called 911 did the police Q. 2 arrive to your location? 3 5, 10 minutes, maybe. Α. 4 How many police officers? Q. 5 There was a lot. I can't answer that. Α. 6 They didn't actually come to my location. 7 They went to the area of the shooting. 8 I will rephrase my question. Q, 9 To your location, where you were, how long 10 did it take for the police to arrive? 11 It was a while. Α. 12 How long is a while, a half hour, an hour? Q. 13 A. A half hour at least, because we were 14 already outside. 15 We were already over in the general area of 16 the shooting, so they spoke to us mostly over there. 17So you heard the shooting, got dressed, Q. 18 looked outside, you saw a car, you then went with 19 your husband out the door --20 No, I stayed inside. 21 A. You called it 911, and your husband went Q. 22 outside? 23 Yes. Α. 24 And then at some point in time you wander Q. 25

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over to where the shooting occurred? 1 Correct. Α. 2 How long after you called 911 did you go to Q. 3 where the shooting occurred? 4 Let's say 15, 20 minutes. 5 Α. Q. Okay. 6 And when you went to the location where the 7 shooting occurred, were there already police at that 8 location? 9 Yes. Α. 10 Did you then go up to police officer and Q. 11 indicate that you had called 911? 12 Yes. Α. 13 And did they separate you and your husband 14 Q. at that time? 15 Α. No. 16 So you and your husband remained together at Q. 17 the location where the police were, until the police 18 had then spoke to you? 19 Α. Correct. 20 And spoke to you, and the police spoke to in Q. 21 I believe you had indicated, a marked patrol car? 22 a, Yes. Α. 23 And that's when you gave a recorded 24 Q. statement? 25

That was quite a few hours later that they Α.] did the recorded statement. 2 So you gave a statement in a marked police Q. 3 car first that wasn't recorded? 4 The recorded statement was in an unmarked 5 Α. vehicle. 6 O. Okay. 7 You gave statement in a marked vehicle? 8 The written, are you talking the written 9 Α. statement? 10 Written statement. 11 Q. The written statement I did in my own home. 12 Α. You indicated that you went in a marked Q. 13 patrol car and gave a statement? 14 We went in the marked patrol car to view a Α. 15 vehicle that they had stopped. 16 And, so, how soon after the shooting 17 Q. occurred did they take you in the marked patrol 18 vehicle to see what they speculated was the same 19 vehicle? 20 MS. PIEPER: objection, Your Honor, to the 21 form of the question. 22 MR. MANN: They, meaning the police. 23 THE COURT: Hold on. 24 Number one I am not a jury. I can discern 25

it. 1 Number 2, the question is not evidence. Ιt 2 is a question. 3 Her answers are evidence. 4 MS. PIEPER: However, Judge, if we end up 5 not being able to get her back, and we have to read 6 testimony in, I will object to form of that 7 question, because I have to read that in front of a 8 jury. 9 THE COURT: All right. 10 Mr. Mann, rephrase it slightly. 11 MR. MANN: Your Honor, my question was at 12 the time. 13 Q. All right. 14 When you were taken in a marked patrol 15 vehicle, did you know that the vehicle that they had 16 stopped was the vehicle you had seen? 17 No. Α. 18 Did you believe that the police believed it Q. 19 was the vehicle that you had seen? 20 MS. PIEPER: Objection, Your Honor, calls 21 for speculation. 22 MR. MANN: This is what her belief was. 23 THE COURT: The question is bad, Mr. Mann, 24 so I will sustain it. 25

Maybe you can rephrase it. 1 When you were being transported, what did Q. 2 you believe the purpose was for your transportation? 3 To see if the vehicle they had stopped was Α. 4 the same vehicle that we had seen. 5 Okay. Q. 6 And you had indicated the location that it 7 was, the same vehicle, correct? 8 Yes. We could not say 100 percent, because A 9 the vehicle we had seen go through the alley had all 10 windows up, very dark tinted. 11 When they took us to view the vehicle, all 12windows were down, so we had no way of seeing the 13 tint. 14 We told them at that time if the rest of the 15 windows matched the little one in the rear that 16 could not good down, then yes. 17 Q. When you had made that identification of the 18 car, was both you and your husband in the marked 19 patrol vehicle looking out? 20 Yes. Α. 21 And you could here what your husband was Q. 22 saying about this vehicle? 23 Yes. Α, 24 And your husband could hear what you were Q. 25

saying about this vehicle? 1 Α. Yes. 2 MR. MANN: I have no further questions. 3 THE COURT: Redirect. 4 I would like to MR. OTTO: 5 THE COURT: Mr. Otto, here is the thing, 6 direct, then you get to cross, then Mr. Mann, and 7 then it goes back to Ms. Pieper. 8 Ms. Pieper, redirect? 9 MS. PIEPER: No, Your Honor. 10 THE COURT: Mr. Otto, normally I don't it, 11 but I know you want to ask a question. 12 MR. OTTO: I just wanted to cleanup the map 13 a little, mostly to make sure it is clear. 14 There is just one thing on the map. 15 THE COURT: Okay. 16 MR. MANN: Your Honor, I would say that if 17 there are any sort of notations on the map, that it 18 be done in a different color. 19 20 CROSS-EXAMINATION 21 22 BY MR. OTTO: 23 Q. Let the record show I am just asking the 24 witness about Defendant's Exhibit A. I will have 25

her draw it in a big red marker. 1 I wonder if it wouldn't be easier if we drew 2 it in a ball point pen. 3 This arrow which you drew to indicate the 4 direction of the travel of the vehicle you saw, 5 could you mark that up here as direction of the 6 travel? 7 Do you want me to go over it with the red? Α. 8 That's okay, sure. 9 Q. And then one question, something in the 10 Q. neighborhood off of the off map, is the Eureka 11 Casino near this neighborhood? 12 Α. Yes. 13 This is Karen Avenue; where would the Eureka Q. 14 Casino be located? 1.5 On corner of the Sahara and Sherwood. 1.6 Α, Where is Sahara? Q. 17 Off the map. Α. 18 Could you just draw approximately on this 19 0. map with that red a square showing the Eureka 20 Casino? 21 And then if you can sign this map down there 22 with your name for the record? 23 Can I have a real pen? Α. 24 THE COURT: She can do that in ball point. 25

MS. PIEPER: And the date. 1 And the date. Q. 2 Then just one based on Mr. Mann's question; 3 and I need to refresh my memory. 4 Did you say you heard the statement that 5 your husband gave to the police, or you didn't? 6 Which statement? Α. 7 Q. Either, any statement. 8 Did you hear him give any statement to the 9 police? 10 The recorded statements were done 11 Α. separately. 12 Q. Did he ever talk to the police at the scene 13 or at your house without a recorded statement in 14 your presence? 15 Yes, but just general talk. Α. 16 Did what he say differ from what you said? Q. 17 Yes. Α. 18 In what way? Q. 19 He had more description, more detail of the Α. 20 vehicle than I did. 21 What is your husband's name? 22 Q. Darren Desoto. Α. 23 MR. OTTO: Thank you very much. 24 THE COURT: Ma'am, thank you very much for 25

your patience and testimony today. 1 I ask that you step down. 2 Please don't discuss your testimony with 3 anybody during the course of this case unless it is 4 a representative from the District Attorneys office 5 or Mr. Otto's office or Mann's office. 6 They will identify themselves appropriately 7 for you. 8 Thank you for your time and patience today. 9 So step down. 10 State, call your next witness. 11 MS. PIEPER: The State calls Ashely Scott. 12 MR. MANN: Your Honor, can we open up --13 THE COURT: Yes. Amber will handle that. 14 15 ASHELY SCOTT, 16 17 who, being first duly sworn to tell the truth, the 18 whole truth, and nothing but the truth, was examined 19 and testified as follows: 20 21 THE CLERK: Please be seated. 22 Please state your name and spell it for the 23 record. 24 THE WITNESS: Ashely Scott, A-s-h-e-l-y 25

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S-c-o-t-t. 1 MS. PIEPER: I would object to anybody 2 coming in. 3 THE COURT: Tell the 4 to come in. We will 4 see how they do, just the 4. 5 MS. PIEPER: I would object to anybody 6 coming in. 7 8 DIRECT EXAMINATION 9 10 BY MS. PIEPER: 11 I draw your attention to November 5, 2013. 12 Q. Were you at 2655 Sherwood, Apartment Number 13 18, here in Las Vegas, Clark County, Nevada? 14 Α. Yes. 15 Who were you there to see? Q. 16 Leroy. Α. 17 And at that time were you kind of dating him Q. 18 or seeing him? 19 A. Not necessarily. 20 Q. Okay. 21 Approximately what time did you get to that 22 apartment? 23 A. I can't really say exactly what time I got 24 25 there.

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1	I do stay in an apartment like one building
2	over, but the very last time I did look at my watch
3	it was about 12:47 on my phone.
4	Q. So you were there maybe the late hours of
5	the 4th going into the 5th?
6	A. Correct, because I stayed in the Apartment
7	Number 11.
8	Q. Okay.
9	When you got there, who else was in the
10	apartment?
11	A. Nat and I did not know at the time that
12	Manook was in the back room.
13	Q. Can you spell Manook?
14	A. I didn't know his name was Manook until I
15	got to this point.
16	Q. Somebody else it was yourself?
17	A. Yes.
18	Q. Leroy?
. 19	A. Yes.
20	Q. Nat?
21	A. Yes.
22	Q. And Manook?
23	A. Correct.
24	
25	you hang out in the apartment?

4.0

Just in the front living room. 1 Α. How many bedrooms are there in that Q. 2 apartment? 3 2. Α. 4 How many bathrooms? 5 Ο. One. 6 Α. When you first walk into the apartment, what Q., 7 room are you walking into? 8 The living room/kitchen. Α. 9 When you walk in, what side is the living 10 Q. room on? 11 The right side. Α. 12 What side is the kitchen on? Q. 13 The left. 14 Α, As you continue into the apartment, where is 15 Q. the bathroom? 16 To the left, by the second bedroom. Α. 17 And to the right behind the living room, is Q. 18 that going to be the first bedroom? 19 Correct. 20 Α. When you first walked into the apartment, Q. 21 where did you go? 22 Into the living room. Α. 23 Okay. Q. 24 And who else was in the living room at the 25

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time? 1. Leroy and Nat. Α. 2 Manook was in one of the other bedrooms, you 0. 3 found out later? 4 Correct. 5 Α. You were inside the apartment, what were you Q. 6 guys doing? 7 Actually Nat and Leroy went over to PT's to Α. 8 grab some hamburgers. 9 At that point they returned. We ate the 1.0 hamburgers, and around 12:47 was the last time I 11 looked at my clock, because I was waiting for my 12 unemployment to go onto my card so that I can 13 14 leave. The next thing I know I am shot in the foot. 15 You are sitting in the apartment; how many Q. 16 couches are in the apartment? 17 2. Α. 18 And where are the couches in relationship in Ο. 19 the living room? 20 There is a love seat against the wall that Α. 21 is going to be in front of the first room. 22 And then there is a longer couch in front of 23 the window. 24 Where were you sitting? ο. 25

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- 1	A. On the love seat.
2	Q. By yourself or with somebody else?
3	A. With Leroy.
4	Q. And how were you sitting on the love seat
5	with Leroy?
6	A. I was sitting closer to the wall by the TV
7	with my feet down.
8	Leroy was across with his feet across me.
9	Q. His feet were across your lap area?
10	A. Yes.
11	Q. Where was Nat sitting?
12	A. On the opposite couch.
13	Q. If I were to walk into that apartment, would
14	Nat I walk in and turn to the right, is Nat
15	sitting on right or the left-hand side?
16	Let me ask a better question.
17	I walk into the apartment, and I am looking
18	at the living room area; are you and Leroy sitting
19	on the left-hand side or the right-hand side of the
20	room?
21	A. The left-hand side, closest to the first
22	bedroom.
23	Q. So when you first walk in, the wall where
24	the couch is, is where Nat is sitting?
25	A. Correct, immediately, as soon as you walk

in, right by the window. 1 2 Q, Okay. You guys are sitting that way, you and Leroy 3 are sitting that way, and then you say you fall 4 asleep? 5 A. Yes. 6 What is the next thing you remember? 7 Q. Around 12:47 I looked onto my phone, and À. 8 said I was going to give myself another 15 minutes 9 and fell back to sleep. 10 Q. And what is the next thing you remember 11 happening? 12 A. A whole bunch of gunshots. 13 Q. Can you tell me approximately how many 14 gunshots you heard? 15 I heard the first one. I jumped. I tried Α. 16 to make me way into the room. 17 Later on I counted gun holes, and there was 18 about 13 of them. 19 Q. When you say you hear the initial shot, and 20 you get up and try to get into the other room, what 21 room are you talking about? 22 The closest room to me, that was the one 23 Α. towards the left. 24 So that would be the bedroom that we talked 25 Q.
about previously as number 2? 1 Correct. The one closest to the bathroom. Α. 2 You get up, you hear the first gunshot, and Q÷. 3 then you say you tried to get to that room. 4 What keep you from going into that room? 5 A lot of panic. I jumped up and ended up in Α. 6 the back corner. I thought; oh, my God, what is 7 going on. 8 I tell myself to get down. I tried to crawl 9 into the room. I looked to the left and I had seen 10 Nat on the floor, and then I made my way into the 11 room. 1.2 At that point I got into the closet. 13 You got into the closet in bedroom number 2 Q. 14 or one? 15 The one closest to the bathroom. Α. 16 So bedroom 2. Q. 17 When you initially get up and you say that 18 you hear panic, as you are panicking, are you 19 continuing to hear gunshots? 20 I can't recall. Α. 21 You eventually get into the bedroom, and you Q. 22 get into the closet. 23 What happens next? 24 At that point I try to feel over my body, to Α. 25

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make sure I am not shot. 1 I feel my foot is burning. I have blood on 2 my sweets, and that's when I saw I was shot. 3 The left or the right side? Q. 4 The left foot. Α. 5 You saw blood that was on your hand, and Q. 6 what do you do next? 7 Could you repeat that? Α. 8 You feel kind of blood, you said, on sweats, Q. 9 what did you do next? 10 After I saw blood on my sweats, I reached Α. 11 down to my left booth, and that's when I saw that I 12 was shot. 13 What did you see? Q. 14 Blood on my hands. Α. 15 Then what happened? Q. 16 At that point I just kind of laid there. Α. 17 Manook came out of the room, and asked if everybody 1.8 was okay, and started to call 911. 19 That's when I yelled my foot was on fire, 20 and then he continued to talk to the police or the 21 ambulance. 22 Q. When you say Manook came into the bedroom, 23 when you went into bedroom number 2 closest to the 24 bathroom, do you know if he was in that room at that 25

time, or was he in bedroom number one? 1 I believe he was in bedroom number one. Α. 2 And when he came into room where you were, Q. 3 do you remember if you were screaming in the 4 closest, or do you know how he found you in the 5 closet? 6 A. He initially asked if everybody was okay. 7 I crawled back out, and I seen Nat on the 8 floor, and I crawled back into the closest. 9 I am assuming that's when he saw me. 10 But you don't know for sure, and eventually 11 Q . he found you in the closet? 12 Correct. 13 Α. He had been on the phone with 911; do you 14 Q. ever call 911 on your own? 15 Α. No. 16 After you realized you are shot, and he 17 Q. calls 911, what happens next? 18 He continued on the phone. I stayed in the 19 Α. closet until the police tells us to come out. 20 When you were in the closest, was the door Q. 21 opened or closed? 22 A. The closet was opened. 23 Q. Once the police get there, are they in 24 25 uniform?

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Α, Yes. 1 And eventually you see they are in marked 2 ο. patrol cars? 3 Yes. Α. 4 Until the immediate time they get there, you Ο. 5 didn't see cars? 6 Not until they called everybody out of the Α. 7 house, and I knew it was the police. 8 How did you know the police was there? Q. 9 They called everybody out of the house. Α. 10 Who else came out? 11 . Q . Manook and Leroy. 12 Α. What about Nat? 13 0. He was dead already. Α. 14 How do you know he was dead? Q. 15 He wasn't moving when I walked out past the Α. 16 cops. 17 Initially you said that you kind of went Q. 18 over to him when the shooting started; did you touch 19 him? 20 I didn't go all the way out. Once I made it Α. 21 into the room, I checked myself, noticed I was shot, 22 I crawled to the door. 23 That's when I saw him laying on the floor, 24 so I crawled back into the room, into the closet. 25

Q. Once you were ordered out of the apartment, 1 and you saw Leroy Manook out there, I am assuming 2 there are also police out there? 3 Correct. Α. 4 Could you see whether anybody else was Q. 5 injured? 6 A. Yes. 7 Who else was injured? Q. 8 Leroy. 9 Α. Where? Q. 10His foot. Α. 11 Do you know whether it was his right or Q. 12 left? 13 I believe it was the left. Α. 14 What about Manook? Q. 15 No. 16 Α. Could you not see if he was injured, or you Q. 17 don't know? 18 I don't believe he was injured. 19 Α. How did you know Leroy was injured? Q. 20 I saw blood on his foot. Α. 21 You didn't see any blood from Manook, is Q. 22 that correct? 23 Correct. Α. 24 You spoke to the police, is that correct? Q. 25

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1	A. Yes.
2	Q. You told them what happened?
3	A. Correct.
4	Q. Then eventually were you taken into an
5	ambulance, and you went to the hospital?
б	A. I was taken into the ambulance, to the
7	hospital. Once I got there, the CSI came in, spoke
8	to me, got my statement.
9	Q. And you went to Sunrise Hospital?
10	A. Correct.
11	Q. Once you got to Sunrise Hospital, did they
12	
13	A. No. They gave me some pain pills and told me
14	
15	
16	Q. Eventually you went home, correct?
17	
18	
19	in regard to your foot, or did the bullet stay in
20	your foot?
21	A. Yes.
22	Q. That day, correct?
23	
24	Q. Eventually was the bullet taken out?
2.	5 A. Almost 7 days later.

How was the bullet taken out? Q. 1 Surgically. Α. 2 Do you have a scar as a result of that? Q. 3 Yes. Α. 4 Since November 5th, 2013, have you been in 0. 5 any type of pain as a result of the injuries that 6 happened? 7 I can't walk that well. Α. 8 You can walk better before, is that correct? Q. 9 Correct. 10 Α, MS. PIEPER: Your Honor, may I approach the 11 witness? 12 THE COURT: You may. 13 I am showing these to defense counsel, Q. 14 showing you State's Proposed Exhibit 13 and 14, do 15 you recognize who is in that picture? 16 Yes, Α. 17 What does that depict? Q. 18 Yes. Α. 19 Let's take 13 first, who is that a picture Q. 20 of? 21 Myself. 22 Α. Is that what you looked like on November 5, Q. 23 2013? 2.4 My hair was a lot better earlier that day. 25 Α.

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Q. Besides that, is that how you looked? 1 2 Α. Yes. MS. PIEPER: Your Honor, I move for 3 4 the admission of 13. MR. OTTO: No objection. 5 MR. MANN: No objection. 6 THE COURT: 13 is deemed admitted. 7 Q. Looking at State's Proposed 14, what 8 is that a picture of? 9 A. My foot. 10 Q. Your left foot? 11 Α. Yes. 12And is there sort of like a circle, a 13 Q. 14 circle where you actually saw the bullet on the heel part of your foot, below your ankle 15 bone? 16 A. I think I am confused. 17 Q. In this picture State's Proposed 18 Exhibit Number 14', do you see sort of red 19 20 circle where the bullet was sort of near the heel area of your left foot? 21 A. Yes. 22 Is that how it looked on the November Q. 23 5, 2013? 24 A. Yes. 25

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MS. PIEPER: The State moves for the 1 admission of 14. 2 MR. OTTO: No objection. 3 Just for clarification, when was MR. MANN: 4 this picture taken? 5 When was the picture taken? Q. 6 Immediately after I was admitted into the Α. 7 hospital. 8 November 5, 2013? Q. 9 Α. Yes. 10 MR. MANN: No objection. 11 THE COURT: 14 is admitted. 12 Q. You don't want to be here today, do you? 13 A. Absolutely not. 14 Q. And you are in custody as of this moment, 15 correct? 16 Correct. Α. 17 Q. That is for traffic tickets? 18 Correct. I decided to go ahead and turn 19 Α. myself in so I wouldn't have to pay the fines. 20 MS. PIEPER: Thank you. 21 No further questions by the State. 22 THE COURT: Mr. Otto, cross? 23 MR. OTTO: Just a few, Your Honor. 24 25

CROSS-EXAMINATION 1 2 BY MR. OTTO: 3 Were you treated by ambulance at the scene? Ο. 4 No, I was just taken immediately to Sunrise 5 Α. Hospital. 6 By ambulance? Ο. 7 A. Correct. 8 And where did they ambulance responders --9 Q. where did they see you, in the courtyard or 10 elsewhere? 11 The courtyard. Α. 12 Did they remove your socks? Q. 13 I don't believe so. Α. 14 Did you remove your socks? Q. 15 I don't think so. 16 Α. Did you ever step on the stairs next to this Q. 17 apartment? 18 No. Α. 19 You never saw who shot into the apartment? Q. 20 Correct. 21 Α. You don't know who shot into the apartment? Ο. 22 Correct. Α. 23 You don't know at the time the shots were 24 Q... being fired, you didn't know where they were coming 25

from, is that correct? 1 I am assuming outside the window. Α, 2 And you counted the bullet holes? Q. 3 Α. Correct. 4 When did you do that? 5 ο. The next day after I returned from the Α, 6 7 hospital. MR. OTTO: That's all, Your Honor. 8 THE COURT: Mr. Mann. 9 10 CROSS-EXAMINATION 11 12 BY MR. MANN: 13 Ms. Scott, how many times had you been to 14 Q. this apartment before the shooting? 15 16 Α. Maybe 4, 5. Who did you know at that apartment that 17 Q., caused you to go back? 18 Leroy, - 19 Α. Did Leroy live at that apartment? 20 Q. Not that I know of. Α. 21 Why is it that you were able to find Leroy 22 Q. 23 at that apartment? I stayed in the building right next to it. 24 Α. Why is it that Leroy was at that apartment? 25 Q.

Personal interests. I don't know. Α. 1 Who did Leroy know at that apartment? Q. 2 I don't know. Α. 3 Ms. Pieper asked you if Leroy was your Q. 4 boyfriend, correct? 5 Correct. Α. 6 You stated no, or that he was? Q. 7 I didn't answer the question, because I Α. 8 believe that intrudes on my privacy. 9 Was Leroy your boyfriend? Q. 10 Because of my privacy, I don't want to Α. 11 12 answer. MR. MANN: Your Honor, I ask that you 13 instruct the witness to answer. 14 MS. PIEPER: I don't know if it is 15 relevant. 16 MR. MANN: Do you want me to answer? 17 THE COURT: Yes. 18 It goes to the relationships of MR. MANN: 19 potential victims in there. 20 It goes to their potential biases. 21 It goes to why they would know certain 22 things in the apartment. 23 Certain things about what Leroy may have 24 done, or things like that before or after this 25

	1	incident.
1	2	THE COURT: I don't think you need to ask
	3	whether he was her boyfriend.
	4	You can ask some other questions.
	5	I don't think she's comfortable talking
	6	about that.
	7	MR. MANN: What is the objection as to why
	8	she can't answer the statement?
	9	MS. PIEPER: Relevance.
	10	THE COURT: Okay.
	11	Here is where we are at.
	12	She, Ms. Scott, discussed that she knows
	13	Leroy.
	14	I am happy for you to ask, inquire as to her
	15	level of how she's knows Leroy.
	16	She doesn't appear to be comfortable with
	17	utilizing the term boyfriend.
	18	So maybe you want to ask something else.
	19	MR. MANN: That's fine.
	20	Q. How long have you known Leroy?
	21	
	22	
	23	A. In the apartment complex.
	24	Q. Okay.
	25	When you said that you lived in Apartment

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11, is that the same building as Apartment 18, or a 1 separate building? 2 One building over to the left. Α. 3 And you found, or you met Leroy as you 2 4 Ο, were coming and going in that apartment complex? 5 Correct. Α. 6 And you guys were friends? Q. 7 Correct. Α. 8 And had you become more than friends? 9 Q. Is that intruding on my privacy. Α. 10 That one is not. THE COURT: 11 Α. Yes. 12 And at the time of the shooting, were you Ο. 13 and Leroy more than friends? 14 Yes. Α. 15 You answered as with a question mark; are 16 Q. you sure you were more than friends at that time? 17 I object. MS. PIEPER: 18 Hold on. THE COURT: 19 MS. PIEPER: I object based on relevance. 20 He wants to ask her certain things. I don't 21 know about their relationship. 22 I think he wants to ask her several things 23 in regards to Leroy. 24 I don't know -- I don't why he doesn't just 25

ask those questions.

1	ask those questions.
2	I understand what he is getting at, but to
3	me the questions he is asking, whether somebody is
4	quite frankly in a sexual relationship with someone
5	or not, I don't think that determines that tells you
6	what they were doing in the apartment.
7	He can ask her if he knows what Leroy was
8	doing in that apartment. I don't know why it
9	matters whether they are in a sexual relationship or
10	not.
11	That sounds like where he is going.
12	THE COURT: I think he was asking whether
13	they were more than friends.
14	Are you going to get into the details?
15	MR. MANN: Your Honor, I was pretty much
16	done as soon we got to the point were they more than
17	friends at the time of the shooting.
18	MS. PIEPER: Thank the Lord.
19	MR. MANN: I ask that counsel from the State
20	refrain from making those comments.
21	THE COURT: Calm down, otherwise it will be
22	a long day.
23	
24	
25	I will ask that everyone else act like

ladies and gentlemen. 1 Mr. Mann, you asked a final question, and 2 Ms. Scott was trying to answer it. 3 I will allow you to answer the question 4 again. 5 Ms. Scott, at the time of the shooting, were Q. 6 you and Leroy more than friends? 7 Define what more than friends is. A. 8 MR. MANN: I am leave it at that, Your 9 Honor. 10 THE COURT: Okay. 11 You had said that you had been to the Q, 12apartment that Leroy -- or Apartment 18, I believe 13 you said 5 times prior, is that correct? 14 Correct. Α. 15 And had you been to the apartment, Apartment ο. 16 18 before you had met Leroy, or only after you met 17 Leroy? 18Only after. Α. 19 And, so, you had said that you had met Leroy Q. 20 a couple of weeks before the shooting, correct? 21 Yes. Α. 22 So, then, it would be fair to say that you Q. 23 had been to Apartment 18 a couple of times in the 24 last few weeks before the shooting? 25

1	A. Correct.
2	Q. And when you were there, who do you
3	remember the first time that you were at that
4	apartment?
5	A. Yes.
6	Q. And do you remember who was the that
7	apartment the first time you were there?
8	A. Leroy.
9	Q. Was there anyone else at the apartment the
10	first time you were there?
11	A. NO.
12	Q. Do you remember about the date that you were
13	at the first time at that apartment?
14	A. It had to be the beginning of October
15	sometime.
16	Q. Okay.
17	Did it appear that Mr. Leroy lived at that
18	apartment at that time?
19	A. Well, he was living out of a suitcase. He
20	told me that he resided in Florida, and would be
21	going back in a couple of weeks.
22	MS. PIEPER: Objection, Your Honor, hearsay.
23	THE COURT: Sustained.
24	Q. It was your belief then that Leroy was
25	visiting that apartment?

I can assume so. 1 Α, And from the time that you first went there ο. 2 until the shooting, you believe that Leroy continued 3 to visit that apartment? 4 Yes. Α. 5 Q. Staying out of a suitcase from that 6 apartment? 7 A. Correct. 8 Now, when you said staying out of a 9 0. suitcase, was he sleeping in a particular room or on 10 the couch? 11 In the room closest to the bathroom. Α. 12 Was that ultimately the room that you ended Q. 13 up crawling into to get into the closet? 14 A. Correct. 15 And had you met Nat before the day of the Q. 16 shooting? 17 Yes. Α. 18 How many times had you met or been with Nat Ο. 1.9 before the shooting? 20 Twice. Α. 21 And was that at Apartment 18? 0. 22 A. Correct. 23 Had you seen -- I think you said the name Q. 24 was Manook at that apartment before the day of the 25

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1	shooting?
2	A. Correct.
3	Q. How many times had you seen Manook at that
4	apartment before the day of the shooting?
	A. Maybe once or twice.
6	Q. Had you seen Nat in the apartment complex
7	before you met Leroy?
8	A. NO.
9	Q. Had you seen Manook at apartment the complex
10	before you met Leroy?
11	A. Yes.
12	Q. How many times had you seen Manook at the
13	apartment complex before you met Leroy?
14	A. Maybe 3, 4 times. It was more of a coming
15	and going situation.
16	Q. Did you ever talk to him?
17	A. Not too many words.
18	Q. Hello, normal courtesy type words?
19	
20	Q. Anything other than hello, how your day, the
21	
22	
23	Q. But you didn't have any other words than him
24	trying to hit on you?
25	A. No.

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1	Q. Okay.
2	How long had you lived in Apartment 11
3	before the shooting?
4	A. I believe it was the end of June, beginning
5	of July.
6	Q. Who do you feel with at Apartment 11?
7	A. Rickie Parish.
8	Q. And who is he?
9	A. A friend.
10	Q. Is it just you 2 in that apartment?
11	A. Her 2 children. She's was pregnant at the
12	time, and the father of her kids.
13	Q. Okay.
14	So it was you, Rickie, Rickie's baby daddy?
15	A. The father of her children.
16	Q. And her 2 children?
17	A. Correct.
18	Q. And on the night of the shooting, you had
19	indicated that at 12:47 you had looked at your, I
20	believe your phone?
21	A. Correct.
22	Q. And there was a clock on your phone?
23	A. Correct.
24	Q. Were you looking at your phone in order to
25	determine if you received Welfare funds?

Unemployment benefits. Α. 1. Unemployment funds? Q. 2 Yes. 3 Α. And when you said that you looked at it and Q . 4 said I am just going to give myself 15 more minutes? 5 Correct. Α. 6 What did you mean when you said I will give 7 0. myself 15 more minutes? 8 Well, around 12:01, I called up my Α. 9 unemployment card, and my funds weren't there. 10 And normally I know about 1:00 o'clock they 11 do enter on my card. 12 I was going to travel over to the LVH to 13 engage with a couple of friends. 14 Since it wasn't on at 12:01, I checked the 15 clock and seen it wasn't 1:00 o'clock, so I decided 16 to lay back down. 17 Q. It was your intention that in 15 minutes you 18 were going to get up and go somewhere? 19 Α. Yes. 20 And you ended up falling asleep and not Q, 21 going somewhere? 22 A. Yes. 23 Was it your intention to get up and go 24 Q . somewhere to take Leroy with you or not? 25

NO. Α. 1 And when the shooting occurred, you and 2 Ω. Leroy were both on the couch, correct? 3 Correct. Α. 4 And I think you indicated that Leroy, part Ο. 5 of his body was on your legs, or on your lap? 6 Correct. Α. 7 His head or feet? Q. 8 Feet. 9 Α. And when the shooting occurred, you got off Q. 10 the couch? 11 Correct. Α. 12 Immediately onto the ground? Q. 13 No. Into the corner that was closest by the Α. 14 TV, and then from there I told myself to crawl on 15 the floor. 16 Q. Did you see what Leroy was doing at that 17 time? 18 Crawling as well. 19 Α, Q. You saw him get up and get onto the ground? 20 I pushed his legs off of mine. I hoped into Α. 21 the coroner, and he scurried about, and I 22 immediately tried to crawl up to the bedroom. 23 Q. Did you see what Nat was doing at the time 24 you were crawling into the corner? 25

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He was on the floor. Α. . 1 He was already on the floor at that moment? Ο. 2 Correct. Α. 3 And did you ever see Nat move after that Q, 4 time? 5 No. Α. 6 So at the time of hearing gunshots, you did Ο. 7 not see Nat move? 8 Correct. 9 Α. So then once there was the shooting from --Ο. 10 the shooting ceased, that's when you heard Manook 11 come out? 12 Α. Correct. 13 And that was the first time that you had Q. 14 learned that Manook was in the apartment? 15Correct. Α. 16 And were you not surprised to see Manook? Q. 17 Yes. 18Α. You were surprise to see Manook? 19 Q. There was so much commotion going on, I was Α. 20 surprised at everything. 21 Were you surprised to see Manook in the Q. 22 apartment? 23 I did not know he was there. 24 Α. Did it seem unusual that Manook was in that Q. 25

particular apartment? 1 2 Α. No. 3 Q. Do you know if Manook knew Nat? 4 Α. As far as I knew, they were all friends. 5 Q. Okay. 6 And do you have any knowledge as to how 7 Leroy knew Manook or Nat? 8 Α. No. MR. OTTO: No further questions. 9 10 THE COURT: Redirect? MS. PIEPER: No, Your Honor. 11 12 THE COURT: All right. 13 Ma'am, thank you very much for your time and 14 patience today. 15 I ask that you step down. 16 Please don't discuss your testimony with anybody aside from a representative from the 17 18 District Attorneys office or from Mr. Otto or Mann's 19 office. 20 They will identify themselves 21 appropriately. Thank you for your time? 22 23 THE WITNESS: Thank you, Your Honor. 24 THE COURT: Let's get going on the next witness, and then we break in probably 10, 15 25

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minutes. 1 MS. PIEPER: The State calls Marque Hill. 2 3 MARQUE HILL, 4 5 who, being first duly sworn to tell the truth, the 6 whole truth, and nothing but the truth, was examined 7 and testified as follows: 8 9 THE CLERK: Please be seated. 10 Pleas state your name and spell it for the 11 record. 12 THE WITNESS: Marque Hill, M-a-r-q-u-e 13 H-i-l.l. 14 THE CLERK: Thank you. 15 16 DIRECT EXAMINATION 17 BY MS. PIEPER: 18 Q. Hello, Mr. Hill. 19 I didn't want to start questioning. 20 MR. OTTO: Go ahead. 21 Q. Drawing your attention to November 5, 2013 22 were you at 2655 Sherwood Street Apartment Number 18 23 here in Las Vegas, Clark County, Nevada? 24 A. Yes. 25

Q. 1 And who else was in that apartment with you? 2 Α. Leroy. 3 Leroy Thomas? Q. 4 Α. Yes, Leroy Thomas. 5 Shelly,. And Nat. 6 7 And we sort of have a set up of how the Q. 8 apartment is; at approximately 4:30 in morning, what 9 room were you in? 10 Were you in the bedroom closest to the bedroom, or were you in the bedroom behind the 11 living room? 12 13 Α. The bedroom behind the living room. 14 Q. And did you live at that apartment? 15Α. Yes. 16 Q. And do you know approximately what time 17 Leroy came over and Nat came over, and did you call her Shelly? 18 19 Α, Yes. Did everyone come over at different times? 20 Q. 21 Α. We were there all day. You guys were just hanging out in the 22 Q. 23 apartment? 24 Α. Yes. 25 Were you there day before, November 4th, Q.

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1	2013?
2	A. Yes.
3	Q. So November 5, 2013, at approximately 4:00
4	o'clock in the morning, what were you doing in the
5	apartment?
6	A. I was asleep,
7	Q. As you were sleeping, did something happen?
8	A. I heard gunshots.
9	Q. How many gunshots did you hear?
10	A. About 7, 8.
11	Q. You heard the gunshots, and where are you
12	you said you were sleeping; were you sleeping on the
13	floor or bed in the apartment?
14	A. I was in the bed, but the bed is sitting on
15	the floor.
16	Q. So you heard a series of gunshots; could you
17	tell where the gunshots were coming from?
18	A. Out of the front somewhere.
19	Q. Out of the front, do you mean within the
20	apartment or outside of the apartment?
21	A. I was sleep. I just looked up, and there
22	was holes jumping in the wall, so I rolled on the
23	floor.
24	Q. When you say there were holes jumping
25	through the wall, do you mean as you lying on the

bed, there were holes coming in from the living room 1 area through the wall that separates the living room 2 and your bedroom? 3 Yes. Α. 4 Could you tell whether the holes continued Ο. 5 to the back part of the bedroom or not? 6 I rolled on the floor. Α. 7 Once you heard the gunshots, you just said Q, 8 you rolled on the floor, is that correct? 9 Α. Yes. 10 Then what happened? ο. 11 Leroy came busting through the room, like Ά. 12 I've been shot, I have been shot. 13 I told him to just lay on the floor. Ι 14 crawled out of the room and crawled in the next 15 room, where I seen Shelly laying in the closet, 16 talking about my feet is on fire, she had been 17 shot. 18Your Honor, I move to strike the MR. OTTO: 19 hearsay statements. 20 MS. PIEPER: Judge --21 Were you shocked by the fact that there was Q. 22 gunshots being fired in your house? 23 Yes, but at the same time I was trying to 24 Α. make sure everybody was all right. 25

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That's not an event that had happened on a Q. 1 regular basis in the apartment that you were living 2 in, shots being fired? 3 4 Α. No. MS. PIEPER: Your Honor, I would say they 5 fall under the excited utterance exception. 6 7 THE COURT: I am going to overrule the objection, because we already heard from the prior 8 witness. 9 Q. Shelly says her foot is burning, she's been 10 shot, what happens next? 11 I told her to just stay there. 12 Α. I crawled in the front room to where Nat was 13 laying on the floor, and I checked him. 14 Q. Okay. 15 A. And I called the police. 16 17 Q., When you say you checked him, what do you mean by that? 18 Because he wasn't moving. I was asking him 19 Α. if his is all right. 20 He didn't respond, so I raised his shirt up 21 to see if there were bullet holes. 22 I didn't none. He still wasn't responding. 23 24 I called the police. 25 You called the police, and how long -- what Q.

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did you tell the police, essentially what you told 1 2 us? A. I told them somebody just shot in the house, 3 and I got people on the floor bleeding. 4 How soon did the police arrive? Q. 5 Maybe 8 minutes; 7, 8 minutes. Α. 6 Once the police got there, what happened 7 Q. next? 8 They put us on the floor, made us get on the Α. 9 floor, and checked the house, and they took me out 10 front. 11 Out of the front door of the apartment? Q. 12 Yes, took me out front to the street, and Α. 13 did whatever they did. 14Q. Okay. 15 What do you mean, did whatever they did? 16 I wasn't able to go back in the house. 17 Α. So once you got taken out of the apartment, Q. 18 you weren't able to go back in the apartment? 19 No, not at all. Α. 20 Once you were take taken out of the Ο, 21 apartment, do you know if Leroy Thomas and Shelly 22 also came out of the apartment? 23 A. Yes. They came out and got in the 24 ambulance, and went to the hospital. 25

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Prior to them getting into the ambulance, Q. 1 did you see them in the front area where you were? 2 No. I told them to lay on the floor until Α. 3 somebody gets there, until the police come. 4 Did you see them standing outside where you 5 Ο. were, and Shelly and Leroy? 6 All 3 of us were outside. They made all 3 Α. 7 us come outside and lay down. 8 Lay down on the floor outside? Q. 9 Yes. Α. 10 Okay. Q. 11 You are laying down on the floor outside, 12 once you guys were all laying on floor outside, 13 could you see whether Shelly and Leroy were injured? 14 I knew they were injured, when they Yes. Α. 15told me in the house, when the shooting first 16 occurred. 17 Q. Could you see it; could you see blood; were 18 they screaming? 19 Yes. Lercy's leg was bleeding, and Shelly's Α. 20 foot was bleeding, yes. 21 Q. Then the police showed up, and then 22 eventually it is your testimony that Shelly and 23 Leroy were taken by ambulance? 24 Α. Yes. 25

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And you stayed on the scene? Q. 1 Α. Yes. 2 Now, you actually know Leroy, correct? Q. 3 Yes. Α. 4 MS. PIEPER: Your Honor, may I approach the 5 witness? 6 THE COURT; You may. 7 Mr. Hill, showing you what's marked as Q. 8 State's Proposed Exhibit Number 6, do you recognize 9 who that is? 10 Yes, Α. 11 Who is that? ο. 12 That's me. 13 Α. Is that what you looked like on November 5, 14 Q. 2013? 15 Yes. Α. 16 Is that outside of the apartment that you Ο. 17 were staying at on Sherwood? 18 Yes, it is. Α. 19 Sort of like in the street area. Q. 20 Yes. Ά. 21 MS. PIEPER: Your Honor, the State moves for 22 admission of 6. 23 MR. MANN: No objection. 24 MR. OTTO: No objection. 25

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THE COURT: 6 will be deemed admitted. l Showing you what's marked as State's Q. 2 Proposed Exhibit 7, what does that depict? 3 That is the room that I was in and the bed. Α. 4 That's the room I was in, the bed. 1 was 5 laying there. 6 At the time that the shots were being fired? Q. 7 Α. Yes. 8 Earlier you testified that as you were lying ο. 9 down, and you heard the shots being fired, that you 10 saw holes coming through the wall? 11 Yes. Α. 12 In the right middle part of this picture, 13 Q. there is a wall; can you see that? 14 Yes. Α. 15 And there are some, what looks like holes in Q. 16 that wall? 17 Yes. Α. 18 Is that what you were describing earlier? Q. 19 Bullet holes, yes. Α. 20 Is that a fair and accurate depiction of Q. 21 what the room looked like on November 5, 2013? 22 Yes. Α. 23 MS. PIEPER: The State moves for the 24 admission of 7. 25

No objection. MR, MANN: 1 MR. OTTO: No objection. 2 THE COURT: 7 will be deemed admitted. 3 Showing you State's Proposed Exhibit 12, do 4 Q. you know who that is? 5 Yes. Α. 6 Who is that? 7 Q. Leroy Thomas. 8 Α. Is that what he looked like on November 5, Q., 9 2013? 10 Yes. Α. 11MS. PIEPER: The State moves for the 12 admission of 12. 13 MR. MANN: I have an objection to that one. 14 THE COURT: What is your objection? 15 MR. MANN: if I can ask questions regarding 16 that picture? 17 THE COURT: Okay. 18 19 VOIR DIRE EXAMINATION 20 21 BY MR. MANN: 22 That picture appears to have been taken in 23 Q. the hospital, correct? 24 25 Α. Yes.

	1	Q. Were you at the hospital when that picture
	2	was taken?
	3	A. No, sir.
	4	Q. And, so, you don't know that that is exactly
	5	how Leroy Thomas looked in the hospital, correct?
	6	A. No, sir.
	7	Q. So you do indicate that that is a picture of
	. 8	Leroy Thomas, but as to date and time of that
	9	picture, or location of that picture, you have no
	10	clue?
	11	A. No sir.
	12	MR. MANN: That's my objection, Your Honor.
	13	There is no foundation for that particular
	14	picture.
	15	He can obviously identify the person in the
	15	picture. He can't identify that that is a true and
		accurate depiction of Leroy Thomas in the hospital
	17	on the day in question.
	18	
·	19	THE COURT: Okay. My question then would be, does it depict
	20	
	21	injuries, or does it just depict a picture of what
	22	he looked like that day?
	23	MS. PIEPER: It just depict him.
	24	MR. MANN: I would argue that it does depict
	25	some injuries on there, and some injuries that have

not been described. 1 But I still would say it does not -- this 2 witness cannot indicate that it is a true and 3 accurate depiction of Leroy Thomas on the date in 4 question, and the location. 5 MR. OTTO: I will join in the objection, 6 Your Honor. 7 THE COURT: I am not going to allow --8 State, are you offering 12 for just that's Leroy, or 9 are you offering 12 to be able to later argue as to 10 injuries that are depicted in the photograph? 11 MS. PIEPER: In 12, I don't see any injuries 12 on Leroy, so I don't know how I can argue. 13 THE COURT: That's what my question is. 14 MS. PIEPER: I am just going to argue that's 15 Leroy. 16 THE COURT: If it is just for purposes of 17 this is Leroy, I will allow it to be admitted. 18 However, Mr. Mann, if something happens --19 it is only for the purposes of preliminary hearing. 20 If it looks like down the road Ms. Pieper 21 starts arguing about there is injuries involved, I 22 am not going to consider that. 23 We are just going to say that's Leroy. 24 MR. MANN: Just for the record, I believe 12 25
does depict -- there is bandages on his arm, and 1 things like that. 2 That would indicate that there were 3 injuries. 4 That's part of why I was making that 5 objection. 6 But I understand Your Honor's ruling, and we 7 will see when the argument comes out. 8 THE COURT: So 12 is deemed admitted as that 9 is Leroy. 10 Showing you what has been marked State's Ο. 11 Proposed Exhibit 21, do you recognizes that? 12 Yes. Α. 13 What is that a picture of? Q. 14 The front room. Α. 15 Of the living room area of Apartment Number 16 Q. 18? 17 Yes. Α. 18Depicted in this picture there is 2 couches, 19 Q. do you see that? 20 Yes. Α. 21 And the shorter couch sort of -- I think it Q. 22 is brown and has some flowers and design on it, 23 1 behind that wall, is that the room that you were 24 25 staying in?

Yes. Α, 1 And is this a fair and accurate depiction of ο. 2 what the apartment looked like on November 5, 2013? 3 Yes. Α. 4 MS. PIEPER: The State moves for the 5 admission of 21. 6 MR. MANN: Ms. Pieper, can you just show me 7 that picture again, so I can see what you are 8 looking at? 9 Okay. No objection. 10 MR. OTTO: No objection. 11 THE COURT: It is admitted. 12 I show you what's been marked as State's Ο. 13 Proposed Exhibit 23, do you recognize that? 14 Yes. Α. 15 What is that a picture of? Ο. 16 The same apartment. 17 Α. Is it a different angle? Q. 18 Slightly, yes. 19 Α. Depicted in this picture is sort of, if you Q. 20 were to be in the apartment, correct, and you are 21 looking out towards the front door, out towards the 22 front window, the front door area, is that correct? 23 Yes. Α, 24 Where would the front door be on this 25 Q.

1 picture? A. Against, right next to this couch, 2 3 the longer couch. Q. And where this couch, there is 4 5 curtains in the picture, correct? A. Yes. 6 7 Q. And if I were to open those curtains, 8 what would be in front of that? A. A window. 9 Q. And also depicted in this picture, is 10 11 there somebody else in this picture? A. Yes. 12 Q. Who is that? 13 A. Nat Rawls. 14 Q. That's the way the apartment looked 15 on November 5, 2013? 16 A. Yes. 17 MS. PIEPER: Your Honor, the State 18 19 moves for the admission of 23. MR. MANN: No objection. 20 MR. OTTO: No objection. 21 THE COURT: 23 will be deemed 22 23 admitted. Q. How long had you been staying in that 24 25 apartment prior to the shooting?

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I would say 2 weeks. Α. 1 And during the 2 weeks that you were there, 2 Q. was there a firearm in that apartment? 3 Α, No. 4 Did you have a firearm in that apartment Ο. 5 that night? 6 No, ma'am. Α. 7 MS. PIEPER: I pass the witness. 8 THE COURT: Okay. 9 What we are going to do before we start 10 cross is we will take a break. 11 My staff needs to have lunch. 12 They have been going all morning. 13 Mr. Hill, I remind you that you are under 14 15 oath. You can talk about whatever is going on with 16sports. 17 You talk about that it is cold outside. 18 You cannot talk about anything that was 19 discussed in here, or anything going on with the 20 case. 21 THE WITNESS: Yes, ma'am. 22 THE COURT: You are under oath. 23 You will go with the District Attorney 24 investigator. 25

You will remain under oath, and be back in my courtroom at 5 till 1. And they will probably bring you backup here. All right. Mr. Hill will leave. Be back in 6-A at about 1, so just a few minutes before one. We will take our recess. Gentlemen, 7. Mr. Moten and Washington, they will take you down so that you can get some food and use the facilities. I will see everybody back in Courtroom 6-A at 1. (Luncheon recess taken.) ATTEST: FULL, TRUE, ACCURATE AND CERTIFIED TRANSCRIPTION OF PROCEEDINGS. /,s/ Robert A. Cangemi ROBERT A. CANGEMI, CCR NO. 888

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	that's (5:20)(11:4)(16:3)(18:13)(18:14)(18:15)(19:12)	(77:13) (77:22) (77:24) (78:3) (78:12) (78:15) (78:18)
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	(41:17)(41:10)(41:17)(41:21)(41:22)(41:23)(12:3)(12:3)(12:3)	(54:16) (57:2) (57:5) (58:23) (59:5) (59:12) (62:24) (66:5)
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	(42:21)(42:22)(42:24)(43:1)(43:4)(43:6)(43:12)(43:14)	this $(3:17)(4:9)(4:14)(4:21)(4:22)(5:24)(6:2)(6:11)$
	(43:15) (43:17) (43:18) (43:19) (43:21) (43:23) (43:24)	(6:12) (7:18) (10:9) (17:20) (20:3) (20:8) (21:1) (21:13)
	(44:1)(44:7)(44:11)(44:16)(44:17)(44:20)(44:21)(44:23)	(0:12)(7:10)(10:9)(17:20)(20:3)(20:0)(21:1)(21:1)
	$\frac{1}{44}$, 24) (44, 25) (45, 2) (45, 3) (45, 7) (45, 10) (45, 11) (45, 13)	(21:18) (21:20) (21:21) (22:6) (22:13) (22:15) (22:23)
	(45,14)(45,16)(45,22)(45,23)(46,4)(46,5)(46,18)(46,21)	(23:10) (23:16) (23:24) (24:11) (25:3) (25:14) (26:4) (28:14)
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	(53,20)(53,22)(53,23)(54,4)(54,10)(54,12)(54,17)	those (59:1)(59:20)(83:7)
	$ (54 \cdot 20) (54 \cdot 22) (54 \cdot 24) (55 \cdot 2) (55 \cdot 3) (55 \cdot 6) (55 \cdot 9) (55 \cdot 15)$	thought (45:7)
		through (13:1) (24:5) (34:10) (71:25) (72:2) (72:12) (77:11)
	$\frac{1}{2}(55\cdot 24)(56\cdot 8)(56\cdot 14)(56\cdot 18)(56\cdot 19)(56\cdot 23)(57\cdot 2)(57\cdot 7)$	
	$\frac{1}{2}(55\cdot 24)(56\cdot 8)(56\cdot 14)(56\cdot 18)(56\cdot 19)(56\cdot 23)(57\cdot 2)(57\cdot 7)$	thursday (1:16) (3:1)
	(55:24) (56:8) (56:14) (56:18) (56:19) (56:23) (57:2) (57:7) (57:8) (57:10) (57:17) (57:23) (58:1) (58:3) (58:11) (58:13)	
	(55:24) (56:8) (56:14) (56:18) (56:19) (56:23) (57:2) (57:7) (57:8) (57:10) (57:17) (57:23) (58:1) (58:3) (58:11) (58:13) (58:10) (59:3) (59:6) (59:12) (59:14) (59:16) (59:17) (59:18)	thursday (1:16)(3:1) tickets (53:18) till (85:2)
	(55:24) (56:8) (56:14) (56:18) (56:19) (56:23) (57:2) (57:7) (57:8) (57:10) (57:17) (57:23) (58:1) (58:3) (58:11) (58:13)	thursday (1:16) (3:1)

(31:15) (33:13) (34:15) (38:9) (39:18) (39:22) (39:24) (40:2)	veracity (4:3)
(31:10) (33:10) (34:10) (30:0) (30:10) (30:22) (30:22) (30:22) (30:22)	very (34:11) (37:24) (37:25) (40:2) (68:13)
(40:11) $(42:1)$ $(42:11)$ $(47:1)$ $(48:5)$ $(54:24)$ $(58:13)$ $(58:17)$ $(40:11)$ $(42:1)$ $(42:11)$ $(47:1)$ $(48:1)$ $(51:13)$ $(51:18)$ $(62:2)$	victime (56:20)
(59:17) (60:6) (61:3) (61:7) (61:10) (61:13) (61:18) (62:2)	-iden (4:1)
(64;12)(66;18)(66;24)(67;5)(67;7)(67;14)(68;13)(68;22)	video (4:1) view (20:11)(21:1)(22:6)(27:16)(32:15)(34:12)
$1/(70 \cdot 16) (72 \cdot 24) (77 \cdot 7) (79 \cdot 8)$	VIEW (20:11)(21:1)(22:0)(2:110,(2:110)(2:110)
times (55:14) (60:14) (60:24) (62:19) (63:3) (63:12)	viewed (27:13)(27:20)
Lines (30,14)(00,14)(00,14)(00,14)	violation (5:9)(5:18)
(63:14) (63:22) (70:20)	visit (62:4)
tint (34:14)	visiting (61:25)
tinted (34:11)	visiting (01.23)
today (4:5) (5:12) (6:2) (7:10) (7:12) (15:3) (38:1) (38:9)	VOLE (10:20)
(53:13) (68:14)	
(33,13)(00,14)	
together (31:17) told (14:12)(15:9)(27:18)(34:15)(50:2)(50:13)(50:15)	wait (24:16)(24:17)(24:21)
told (14:12) (15:9) (27:10) (54:15) (50.27 (50.25) (50.15)	(42.12)
(61:20) (66:15) (72:14) (73:12) (74:1) (74:3) (75:3) (75:16)	walting $(42:12)$ walk $(13:1)(41:7)(41:10)(43:13)(43:14)(43:17)(43:23)$
too (63:17)	(43:25) (51:8) (51:9)
took (34:12) (74:10) (74:13)	(43.20)(0110)(01.07)(01.07)
top (19:4) (19:9) (19:12)	walked (41:21)(48:16)
(100 (14.2) (14.4)	walking (41:8)
totally (14:2) (14:4)	walking (41:0) wall (42:21)(43:6)(43:23)(71:22)(71:25)(72:2)(77:11)
touch (48:19)	(77:14) (77:17) (81:24)
toward (13:20)	(30, 25)
towards (13:21) (19:21) (23:15) (25:10) (44:24) (82:22)	want $(7:8)(7:13)(7:17)(7:22)(8:16)(11:24)(17:1)$
township (1:3)	(20:14) (21:22) (24:14) (35:12) (36:8) (53:13) (56:11)
	(20;14)(21;22)(24;14)(35;12)(55;07,55,15)(55,12)
traffic $(53:18)$	(56:17) (57:18) (69:20)
transcript (1:12) (3:25) (4:2)	wanted (4:22)(35:13)
transcription (85:19)	(58.21)(58.23)
transcripts (5:2)	(10:13) $(13:14)$ $(13:12)$
transpire (7:10)	WAS (4:4) (7:4) (0:23) (10:22) (16:11) (17:25) (18:3) (18:5) (13:17) (13:19) (14:13) (14:22) (16:11) (17:25) (23:12)
transportation (34:3)	(13;17) $(13:19)$ $(14;13)$ $(14;22)$ (16117) $(22:23)$ $(23:12)(18:7)$ $(18:19)$ $(20:11)$ $(20:13)$ $(21:23)$ $(22:23)$ $(23:12)$
Lange and (34:2)	(18;7)(18;19)(20;11)(20;13)(21;23)(22;23)(
transported $(34:2)$	(25:21) (26:5) (26:14) (26:16) (26:19) (26:20) (27:6) (27:9) (25:21) (26:5) (26:14) (26:16) (26:19) (26:20) (27:6) (27:9)
travel (36:5)(36:7)(65:13)	(29;12) (28,10) (28,10) (28,25) (29,1) (29,13) (29;12)
treat (50:12)	1/(32.10)/(32.10)/(30.6)/(30.12)/(32.1)/(32.5)/(32.19)/(33.14)
treated (54:4)	(34:4)(34:
treatment (50:18)	(33:17) $(33:20)$ $(33:23)$ $(01:0)$ $(01:14)$ $(40:16)$ $(41:25)$ $(42:3)$ $(38:19)$ $(40:3)$ $(40:9)$ $(40:12)$ $(40:14)$ $(40:16)$ $(41:25)$ $(42:3)$
trial (6:3) (6:10)	(38:19) (40:3) (40:3) (40:12) (40:14) (10:12) (40:14) (14:23) (42:11) (42:12) (43:6) (43:8) (43:11) (44:9) (44:16) (44:23)
tried (44:16) (45:4) (45:9) (63:22) (66:23)	(42;11)(42;12)(43;0)(43;0)(43;11)(43;11)(44;2)(44;10)(41;20)
Cried (44:10)(40,3)(95:18)	(46:3) $(46:6)$ $(46:13)$ $(46:19)$ $(46:20)$ $(46:25)$ $(47:1)$ $(47:2)$ $(46:3)$ $(46:6)$ $(46:13)$ $(46:19)$ $(46:20)$ $(46:25)$ $(47:1)$ $(47:2)$
true (79:16) (80:3) (85:18)	(47,7)(47,7)(47,23)(48:8)(48:9)(48:14)(48:15)(46:44)
truth (10:18) (10:19) (38:18) (38:19) (69:6) (69:7)	(49:5) (49:8) (49:12) (49:14) (49:17) (49:19) (49:20) (50:6)
$44 \cdot 211 (45 : 25)$	(53;4)(53;7)(53;7)(54;2)(52;20)(53;4)(53;6)(53;7)(54;2)
trying (23:7) (23:9) (60:3) (63:24) (72:24)	(50:24) (51:17(51:25) (22:26) (50:3) (59:7) (59:12) (59:15) (55:25) (56:4) (56:7) (56:10) (57:3) (59:7) (59:12) (59:15)
turn = (24:17) (24:21) (26:9) (43:14) (53:19)	(55:25) (56:9) (56:7) (56:10) (57:37) (57:7) (57:10) (67:72)
	(60:3) (61:6) (61:9) (61:19) (61:24) (62:10) (62:13) (62:22) (60:3) (61:6) (61:9) (61:19) (61:24) (62:13) (62:13) (62:24) (61:19) (61:24) (61:
twice (62:21)(63:5)	(62:25) (63:14) (64:4) (64:11) (64:14) (64:22) (65:13)
type (13:7) (14:15) (51:6) (63:18)	-1 (65, 19) (65, 24) (66, 6) (66, 14) (66, 17) (66, 24) (6/, 1) (6/, 2)
Ū	(67:10)(67:14)(67:15)(67:20)(67:24)(67:25)(69:7)(70:1)
· · · · · · · · · · · · · · · · · · ·	$1_{(71+6)}(71+14)(71+21)(71+22)(72+22)(72+24)(72+24)$
uh-huh (23:22)	(71:6) $(71:14)$ $(71:21)$ $(71:22)$ $(72:21)$ $(72:5)$ $(79:2)$ $(81:5)$ $(73:13)$ $(73:19)$ $(75:20)$ $(75:21)$ $(77:4)$ $(77:5)$ $(79:2)$ $(81:5)$
ultimately (62:13)	
	(84:3) (84:19)
unable (28:10)	washington $(1:9)$ (3:6) (3:7) (3:15) (4:8) (5:15) (6:19)
uncalled $(6:8)$	(17.7) (85:8)
under (73:6) (84:14) (84:23) (85:1)	wasn't (29:13) (32:4) (48:16) (65:15) (65:16) (73:19)
underneath (4:13)	(73:23) (74:17)
111:8 (59:2) (81:7)	$h = \frac{1}{2} (9.9) (20.20) (40.2)$
unemployment (42:13) (65:1) (65:2) (65:10)	way $(6:15)(34:13)(37:19)(44:3)(44:4)(44:17)(45:11)$
unfortunately (11:8)	wey (0, (3) (3) (3) (3) (3) (4) (1) (1) (1) (1) (1) (1) (1) (1) (1) (1
uniform (14:24) (47:25)	(48:21) (83:15)
	weather (63:21)
uniforms (15:2)	weeks (57:21) (60:21) (60:25) (61:21) (84:1) (84:2)
unless (38:4)	welfare (64:25)
unmarked (32:5)	well (3:8) (24:2) (51:8) (61:19) (65:9) (66:19)
un-normal (26:15)	$1_{\text{ment}} = (16 \cdot 13) (19 \cdot 2) (19 \cdot 13) (19 \cdot 16) (29 \cdot 11) (30 \cdot 8) (30 \cdot 19)$
un-normal (20:13) until (31:18) (40:14) (47:20) (48:5) (48:7) (62:3) (75:3)	(30:22) (31:7) (32:13) (32:15) (42:8) (46:24) (48:18) (50:5)
(75:4)	(50;9) (50;16) (62:2) (74:25)
(73.4) unusual (26:16) (67:25)	were $(12:1)(15:1)(15:10)(15:13)(15:16)(16:15)(17:18)$
WINDOW (2,0) (0,2) (9:6)	Were (12:1) (10:1) (10:10) (10:10) (10:10) (10:10) (10:10) (10:10)
upon $(7:9)(9:2)(9:6)$	(17:23) (17:24) (22:23) (25:9) (30:10) (30:14) (30:16) (31:8)
upstairs (17:20)	$1_{(21,18)}$ $(33,15)$ $(34,2)$ $(34,13)$ $(34,25)$ $(37,11)$ $(39,13)$
upstairs (17:20) use (85:9)	(31:18) $(33:15)$ $(34:2)$ $(34:13)$ $(34:25)$ $(37:11)$ $(39:13)(39:16)$ $(39:18)$ $(40:4)$ $(40:24)$ $(42:6)$ $(42:25)$ $(43:4)$ $(43:9)$
use (85:9) used (23:21)	(31:18) (33:15) (34:2) (34:13) (34:25) (37:11) (39:13) (39:16) (39:18) (40:4) (40:24) (42:6) (42:25) (43:4) (43:9) (43:13) (47:3) (47:4) (47:21) (49:1) (50:4) (54:4) (54:24)
use (85:9) used (23:21)	$\begin{array}{c} (31;18) & (33;15) & (34;2) & (34;13) & (34;25) & (37;11) & (39;13) \\ (39;16) & (39;18) & (40;4) & (40;24) & (42;6) & (42;25) & (43;4) & (43;9) \\ (43;13) & (47;3) & (47;4) & (47;21) & (49;11) & (50;4) & (54;4) & (54;24) \\ (56;25) & (55;22) & (58;5) & (58;7) & (58;13) & (58;17) & (59;6) & (59;13) \end{array}$
use (85:9) used (23:21) usually (6:14)(6:21)(7:7)	$\begin{array}{c} (31;18) & (33;15) & (34;2) & (34;13) & (34;25) & (37;11) & (39;13) \\ (39;16) & (39;18) & (40;4) & (40;24) & (42;6) & (42;25) & (43;4) & (43;9) \\ (43;13) & (47;3) & (47;4) & (47;21) & (49;11) & (50;4) & (54;4) & (54;24) \\ (58;25) & (55;22) & (58;5) & (58;7) & (58;13) & (58;17) & (59;6) & (59;13) \end{array}$
use (85:9) used (23:21) usually (6:14)(6:21)(7:7) utilizing (57:17)	$\begin{array}{l} (31:18) (33:15) (34:2) (34:13) (34:25) (37:11) (39:13) \\ (39:16) (39:18) (40:4) (40:24) (42:6) (42:25) (43:4) (43:9) \\ (43:13) (47:3) (47:4) (47:21) (49:1) (50:4) (54:4) (54:24) \\ (54:25) (55:22) (58:5) (58:7) (58:13) (58:17) (59:6) (59:13) \\ (54:6) (60 (61:2) (61:3) (61:7) (61:10) (61:12) (64:24) \end{array}$
use (85:9) used (23:21) usually (6:14)(6:21)(7:7) utilizing (57:17) utterance (73:6)	$\begin{array}{c} (31:18) \ (33:15) \ (34:2) \ (34:13) \ (34:25) \ (37:11) \ (39:13) \\ (39:16) \ (39:18) \ (40:4) \ (40:24) \ (42:6) \ (42:25) \ (43:4) \ (43:9) \\ (43:13) \ (47:3) \ (47:4) \ (47:21) \ (49:1) \ (50:4) \ (54:4) \ (54:24) \\ (54:25) \ (55:22) \ (58:5) \ (58:7) \ (58:13) \ (58:17) \ (59:6) \ (59:13) \\ (59:16) \ (60:6) \ (61:2) \ (61:3) \ (61:7) \ (61:10) \ (61:12) \ (64:24) \\ (59:19) \ (66:3) \ (66:25) \ (67:17) \ (67:19) \ (67:22) \ (68:4) \ (69:23) \end{array}$
use (85:9) used (23:21) usually (6:14)(6:21)(7:7) utilizing (57:17)	$\begin{array}{c} (31:18) \ (33:15) \ (34:2) \ (34:13) \ (34:25) \ (37:11) \ (39:13) \\ (39:16) \ (39:18) \ (40:4) \ (40:24) \ (42:6) \ (42:25) \ (43:4) \ (43:9) \\ (43:13) \ (47:3) \ (47:4) \ (47:21) \ (49:1) \ (50:4) \ (54:4) \ (54:24) \\ (54:25) \ (55:22) \ (58:5) \ (58:7) \ (58:13) \ (58:17) \ (59:6) \ (59:13) \\ (59:16) \ (60:6) \ (61:2) \ (61:3) \ (61:7) \ (61:10) \ (61:12) \ (64:24) \\ \hline \\ (65:19) \ (66:3) \ (66:25) \ (67:17) \ (67:19) \ (57:22) \ (68:4) \ (69:23) \\ (70:29) \ (70:10) \ (70:11) \ (70:21) \ (70:22) \ (70:25) \ (71:4) \ (71:7) \end{array}$
use (85:9) used (23:21) usually (6:14)(6:21)(7:7) utilizing (57:17) utterance (73:6) V	$ \begin{array}{c} (31:18) \ (33:15) \ (34:2) \ (34:13) \ (34:25) \ (37:11) \ (39:13) \\ (39:16) \ (39:18) \ (40:4) \ (40:24) \ (42:6) \ (42:25) \ (43:4) \ (43:9) \\ (43:13) \ (47:3) \ (47:4) \ (47:21) \ (49:1) \ (50:4) \ (54:4) \ (54:24) \\ (54:25) \ (55:22) \ (58:5) \ (58:7) \ (58:13) \ (58:17) \ (59:6) \ (59:13) \\ (59:16) \ (60:6) \ (61:2) \ (61:3) \ (61:7) \ (61:10) \ (61:12) \ (64:24) \\ (65:19) \ (66:3) \ (66:25) \ (67:17) \ (67:19) \ (67:22) \ (68:4) \ (69:23) \\ (70:9) \ (70:10) \ (70:11) \ (70:21) \ (70:22) \ (73:22) \ (73:22) \ (74:21) \\ \end{array} $
use (85:9) used (23:21) usually (6:14)(6:21)(7:7) utilizing (57:17) utterance (73:6) V van (13:21)	$ \begin{array}{c} (31:18) (33:15) (34:2) (34:13) (34:25) (37:11) (39:13) \\ (39:16) (39:18) (40:4) (40:24) (42:6) (42:25) (43:4) (43:9) \\ (43:13) (47:3) (47:4) (47:21) (49:1) (50:4) (54:4) (54:24) \\ (54:25) (55:22) (58:5) (58:7) (58:13) (58:17) (59:6) (59:13) \\ (59:16) (60:6) (61:2) (61:3) (61:7) (61:10) (61:12) (64:24) \\ (65:19) (66:3) (66:25) (67:17) (67:19) (67:22) (68:4) (69:23) \\ (70:9) (70:10) (70:11) (70:21) (70:22) (73:22) (73:22) (74:21) \\ (71:12) (71:17) (75:13) (75:14) (75:15) (75:18) (75:24) \end{array} $
use (85:9) used (23:21) usually (6:14)(6:21)(7:7) utilizing (57:17) utterance (73:6) Van (13:21) (1:2)(1:23)(3:1)(39:14)(69:24)	$ \begin{array}{c} (31:18) (33:15) (34:2) (34:13) (34:25) (37:11) (39:13) \\ (39:16) (39:18) (40:4) (40:24) (42:6) (42:25) (43:4) (43:9) \\ (43:13) (47:3) (47:4) (47:21) (49:1) (50:4) (54:4) (54:24) \\ (54:25) (55:22) (58:5) (58:7) (58:13) (58:17) (59:6) (59:13) \\ (59:16) (60:6) (61:2) (61:3) (61:7) (61:10) (61:12) (64:24) \\ (65:19) (66:3) (66:25) (67:17) (67:19) (67:22) (68:4) (69:23) \\ (70:9) (70:10) (70:11) (70:21) (70:22) (73:22) (73:22) (74:21) \\ (71:12) (71:17) (75:13) (75:14) (75:15) (75:18) (75:24) \end{array} $
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1	CASE NO. C294695-1 and C294695-2
2	DEPT. NO. 5
3	IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP COUNTY OF CLARK, STATE OF NEVADA 01/16/2014 01:43:06 PM
6 7	THE STATE OF NEVADA,) Plaintiff,) CLERK OF THE COURT
8 9)) Case No.) 13F18022A-B
10	MATTHEW WASHINGTON,) MARTELL MOTEN,) Defendants.)
12	REPORTER'S TRANSCRIPT OF
1.3	PRELIMINARY HEARING
14	BEFORE THE HONORABLE CYNTHIA CRUZ JUSTICE OF THE PEACE
16	TAKEN ON THURSDAY, December 5, 2013 AT 1:00 P.M.
1.7	
18	
. 1.9	APPEARANCES:
20	For the State: Danielle Pieper, Esq. Chief Deputy dispatch Attorney
22 23	For the Defendant: David Otto, Esq. Joel Mann, Esq. Las Vegas, Nevada
24 25	REPORTED BY: ROBERT A. CANGEMI, CCR No. 888

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			3	WITNESSES:	D	С	RD	RC			
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9		· · · · · ·	5	MARQUE HILL		3	16			· · ·	
			6								
			7	MICHAEL CROMWELL	20	27 31	61				
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			9	CHRISTIAN PARQUETTE	63	71 73	94	95			
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1	:	LAS VEGAS, NEVADA, THURSDAY, DECEMBER 5, 2013
2		* * * * *
3		
4		THE COURT: Let's get back on the
	record.	
б		Okay. Mr. Hill, as I stated, you are
7	still un	derneath oath.
8		All right. Mr. Hill, as I advised,
9	is still	under oath.
10		Mr. Otto, cross?
11	r.	MR. OTTO: Yes.
12		
13	•	CROSS-EXAMINATION
14		
15	ВҰ М	IR. OTTO:
16	Q.	Mr. Hill, whose apartment was that?
17	А.	Theresa.
18	Q.	Theresa who?
19	Α.	I don't know her last name.
20	Q.	And you were staying there, you said
21	you had	been there for how long?
22		About 2 week.
. 23		Where did you come from?
24		Chicago.
25		And you didn't see who fired gunshots

into that apartment, is that correct? 1 No. Α. 2 You don't know who fired them? 3 Q. No. Α. 4 Do you know of any reason why anyone would Ο. 5 fire gunshots into that apartment? 6 No. Α. 7 MR. OTTO: I have nothing else. 8 THE COURT: Mr. Mann, cross. 9 10 CROSS-EXAMINATION 11 12 BY MR. MANN: 13 Mr. Hill, what brought to you Las Vegas? Q. 14 Friends. Α. 15 When did you move here to Las Vegas? Q. 16 I have been out here about a year and a Α. 17 half. 18 Okay. Q. 19 You said that at the time of the shooting 20 you were living at Apartment 18? 21 Yes, sir. 22 Α. How long had you been living there? Q. 23 Be 2 weeks. Α. 24 How long did you come to live at that 25 Q.

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apartment? 1 Theresa. Α. 2 Who is Theresa? Ο. 3 These is a crackhead. Α. 4 A crackhead? Ο. 5 Yes. 6 Α. And is that how you met Theresa? Q. 7 Α. Yes. 8 So then you do drugs? Q. 9 No, sir. I came out here from Chicago with А 10 friends, and we did a little bit too much gambling, 11 and I got stuck. 12 So mingled and gravitated to the neighbor 13 and ran into some crack heads, and I stayed here for 14 a day or 2, and moved to the next place for day or 15 2. 16 She let me stay there. 17 Did you know Leroy Thomas? Q. 18 Yes. Α. 19 How did you know Leroy Thomas? Q. 20 I have been knowing Leroy Thomas for like Α. 21 over 20 years from Chicago. 22 Was he from Chicago? Q. 23 A. Yes. 24 Q. Did Leroy introduce you to Theresa? 25

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No, sir, I introduced him to Theresa. Ã. 1 So you said you met Theresa 2 weeks before 2 Q. the shooting? 3 No, I have been knowing Theresa, but Theresa Α. 4 had an apartment over there. 5 She let me stay there. She knew I didn't 6 have a stable place to stay. 7 Did you know Marque Hill? Q. 8 That is me. Α, 9 Did you know Ashely Scott? Q. 10 A. Yes, I know her, but not for no long amount 11 of time, period of time. 12 Q. Did you meet Ashely Scott through Leroy 13 Thomas? 14 No, actually I met her through her brother. Α. 15 Her brother? Q. 16 Yes. Α. 17 What is her brother's name? 18 Q. We call him Skully. Α. 19 Skully, S-k-u-l-l-y? Q. 20 $\mathbf{S} - \mathbf{k} - \mathbf{u} - \mathbf{l} - \mathbf{l} - \mathbf{y}$. Α. 21 And how long had you known Skully? Q. 22 About a month. Α. 23 And when did you meet Ashely Scott? 24 Q. At least 2 weeks, about 2 weeks after I met Α. 25

her brother. 1 I met her through him. He came and said 2 that was his sister. 3 I was just talking to her. 4 Okay. 5 Q. And do you have nickname that you go by? 6 Nuke. 7 Ά. Do you know how that is spelled? Ο. 8 N-u-k-e. Α. 9 How long have you had that nickname? Q. 10 Since I was 13. Α. 11 How old are you now? Q. 12 38. Α. 1.3 And did you grow up in Chicago? 14 Q. Yes, sir. Α. 15 Have you ever done -- have you ever been Q. 16 convicted of a felony? 17 Yes, sir. Α. 18 Was that in Illinois? Ο. 19 Yes, sir. 20 Α. Ever been convicted of a felony in Nevada? Q. 21 No, sir. Ά. 22 Okay. Q. 23 Did you do time in Illinois? 24 Yes, sir. Α. 25

So you were staying at Apartment 18 for 2 Q. 1 weeks before the shooting; that's when you started 2 living there. 3 Who else was living with you at that 4 apartment? 5 Theresa. Α. 6 Q. Theresa? 7 Yes. Α. 8 Was she staying there at a regular basis or Q. 9 just had her stuff there? 10 It was her apartment. NO. Α 11 She stayed there. 12What room did she stay in? Q. 13 She was in and out everyday. She was a Α. 14 crackhead. 15 She was in and out everyday. She might come .16in, sleep on the couch, go in the room, either room, 17 or she might sleep on the floor. 18 Q. And how long was Leroy staying at the 19 apartment? 20 Like 3, 4 days. Α. 21 If Ms. Scott testified that Leroy had been Q. 22 staying at the apartment for the last 2 weeks, would 23 that be accurate or inaccurate? 24 Inaccurate. Α. 25

Do you know how many times Ms. Scott was at Q. 1 the apartment? 2 If I am not mistaken, every other day. 3 Α. Every other day? Ο. 4 Yes. Α. 5 For the last 2 weeks before the shooting? Q. 6 Yes. Α. 7 It would be at least 7 times, then? 8 Q. Yes. Α. 9 Do you think that it is more or less than 7 10 Q. times? 11 I'd say more. Α. 12 More? Q. 13 Yes. Α. 14 And had you ever seen Nat living at the 15 Q. apartment? 16/ No, sir. Α. 17 When was first time that Nat came to the Q. 18 apartment? 19 I'd say 3 or 4 days before the shooting. Α. 20 How did you know Nat? Q. 21 A. Actually I didn't know him. He was visiting 22 somebody else. 23 When you say somebody else, do you know who Q. 24 that somebody else is? 25

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His cousin. His cousin stayed over there. Α. 1 Over there in Apartment 18? 2 Q. In that apartment building. Α. 3 In the complex? Q. 4 Α. Yes. 5 Do you know his cousin's name? Q. 6 I think Leroy was one of his cousins. 7 Α. Leroy, was that the cousin that you were Q. 8 referring to? 9 No. There is another. I don't know. They 10 Α. have family over there. 11 Leroy was one of his cousins. He was just 12 visiting him and his girlfriend. 13 His girlfriend left to go back to Memphis 14 and left him and that happened. 15 Q. Did Nat have a suitcase that was at the 16 apartment? 17 I think so. Α. 18 Do you know? Q. 19 I think so, yes. Α. 20 Where was he staying in the apartment? Q. 21 He was sleeping on the couch. Α. 22 On the couch. Q. 23 And who was staying in bedroom that was next 24 to the bathroom? 25

Anybody could sleep in there. Α. 1 Anybody could sleep anywhere they wanted to? Q. 2 Yes. Α. 3 Wherever they felony down, that's where they Q. 4 were? 5 Yes. Α. 6 Did Nat have a nickname? Q. 7 NO. Α. 8 Not that you are aware of? 9 Q. Not that I am aware of. Α. 10Did you have conversations with Nat? Q. 11Yes. Α. 12 Did you see him on a regular basis in the Q. 13 4 days that he was staying there? 14 Everyday. Α. 15 Everyday? Q. 16 Yes. Α. 17 And were you working at the time that you Q. 18 lived at that apartment? 19 No. Α. 20 Did you have any place that you regularly Q. 21 would go during the time you were staying at 22 apartment? 23 No, sir. Α. 24 Were there other people besides Nat, Leroy, Q. 25

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1	Ashely, Theresa and yourself that would frequent
2	that apartment?
3	A. Yes.
4	Q. Who else?
5	A. Girls.
6	Q. What kind of girls?
. 7	A. Girls that we talk to out on the street.
8	Not prostitutes.
9	I smoke reefer. We sit in there smoking,
10	play the game, watch TV girls.
11	We talk.
12	Q. People you would meet on the street?
13	A. Yes.
14	Q. You would all hang out in that apartment
15	having a good time?
16	A. Yes.
17	Q. And did anyone else stay at the apartment?
18	A. NO.
19	Q. On the night of the shooting, were you guys
20	hanging out at the apartment smoking reefer?
21	
22	MS. PIEPER: Judge, I object to that, only
23	because can we approach?
24	
25	(A bench conference was had.)

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1 THE COURT: All right. 2 Go ahead, Mr. Mann. 3 Mr. Hill, you said on the night in question, Q. 4 the night of the shooting, that you had smoked 5 reefer that day, correct? 6 Yes. Α. 7 Q. Okay. 8 And were there other people in the apartment 9 with you that had also smoked? 10 No. I smoked by myself. Α. 11 Was Ms. Scott smoking with you? Q. 12 No. Α 13 Was Mr. Thomas smoking with you? Q. 14 No. Α. 15 And was Mr. Rawls smoking with you? Q. 16 NO. Α. 17 Do you know about what time of day this 18 Q. occurred? 19 No. I was asleep. Α. 20 What time of day were you smoking? Q . 21 Oh, about 7. Α. 22 7:00 p.m.? Q. 23 Yes, 7, 7:30. I was watching the Bears and Α. 24 the Packers game. 25

MR. MANN: Court's indulgence. 1 What time did you go to sleep that night? Ο. 2 I don't know exactly what time. I know it Α. 3 was half time. 4 I went to sleep at half time. 5 At half time? Q. 6 Yes. 7 Α. Was anyone home when you went to sleep? Q. 8 Yes. Α. 9 Who was home? Q. 10 Leroy was in the house, and Nathan was in Α. 11 the house. 1.2 If I am not mistaken, Ms. Scott was there 13 too. 14 Ms. Scott was there when you went to sleep? Q. 15 I think she was. Α. 16 And did you have dinner that night? Q. 17 No. 18Α. Do you know -- did you ever wake up after Q. 19 half, but before the shooting? 20 No, sir. 21 Α. So you went to sleep at half, then the Q. 22 shooting occurred was the next thing you remember? 23 Yes. Α. 24 And you decided to go to sleep in room that Q. 25

was next to living room? 1 Right. Α. 2 The wall that was adjacent to the living 3 Q. room? 4 Yes. Α. 5 Had you seen Theresa that day? Q. 6 I think I saw her earlier that day. Α. 7 When you say you think, do you know? Q. 8 I had seen her earlier that day. Α. 9 You did? Q. 10 Yes. Α. 11 Was she in the apartment or somewhere else? Q. 12 She was in the apartment cleaning up. Α. 13 Cleaning up? Q. 14 Yes. Α. 15 Did she know that Leroy and Nat were Ο. 16 lounging, staying there? 17 Yes. Α. 18 Okay. Q. 19 And she permitted that to happen? 20 No, but she knew they were there. Α. 21 She didn't have any objection to it? Q. 22 No, not at all. Α. 23 And do you know if -- you said Theresa was a Q. 24 crackhead. 25

Was there any sort of drug transactions that 1 occurred in front of you at that apartment? 2 Α. No. 3 So you didn't see any dealing of drugs out Q. 4 that apartment? 5 οf No. Α. 6 MR. MANN: Court's indulgence. 7 No further questions. 8 THE COURT: Redirect. 9 MS. PIEPER: Just a couple. 10 11 REDIRECT EXAMINATION 12 13 BY MS. PIEPER: 14 Mr. Mann asked you sort of what time did Q. 15 you -- what were you doing earlier in the day, and 16 you said were you watching part of the football 17 game; do you remember that? 18 Yes. Α. 19 Earlier in the day what did you do. Before Ο. 20 everybody came over, did you guys do anything, go 21 out? 22 Not at all. Α. 23 Once everybody came over, once I should say Q. 24 when Leroy came over, and Nat came over, did you 25

guys ever leave the apartment? 1 2 No. Α. Do you remember speaking to police and 3 Q. talking about how you went to a coroner store and 4 bought Snickers and Almond Joy and Ruffles at the 5 coroner store? 6 I can't remember. 7 Α. No? Ο. 8 I can't remember going to the corner store. 9 Α., I can't remember. 10 Do you remember going to the corner store 11 Q. 12 that day? No. Α. 13 14 Q. Okay. Do you remember if you went to PT's at all 15 to go get a hamburger with Leroy? 16 No. This occurred while -~ they went to 17 Α PT's while I was asleep. 18 So you didn't go to PT's at all? 19 Ο. Not at all. 20 Α. You also testified that when you went out 21 0. into the living are room, you checked on Nat, do you 22 remember That? 23 Α. Yes. 24 Was he making any noise at that time? 25 Q.

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A. No. I was on the phone telling the police 1 that somebody just shot in the house, and he gasped, 2 and that was it. 3 Q. Did you hear him gasp more than once? 4 Just that one time. Α. 5 As he was doing that, could you see his Q. 6 face? 7 Α. Yes. 8 Could you describe for us what his face Q. 9 looked like? 10 A. He just laid on his back with his eyes wide-11 open like this. 12 And while I was on the phone, I was telling 13 them he ain't breathing. 14 He gasped. That's it. 15 Q. After he gasped, and you said he wasn't 16 breathing, did you touch any parts of his body to 17 check for a pulse? 18 A. I just raised his shirt up to see if there 19 were bullet holes. 20 Q. That was in the front? 21 Yes. Α. 22 Did you ever check the back of his body? Q. 23 No. 24 Α. After you checked him, did you continue to 25 Q.
try to talk to him? 1 After he gasped, I knew it was over with. Α. 2 What did you say? 3 Q. After he took his last breath, I knew it was Α. 4 over with. 5 He was dead. 6 MS. PIEPER: Thank you. 7 Nothing further. 8 THE COURT: Mr. Otto, any follow-up? 9 MR. OTTO: No, Your Honor. 10 THE COURT: Mr. Mann? 11 MR. MANN: No thank you, Your Honor. 12 THE COURT: Mr. Hill, thank you very much 13 for your time and patience today. 14 I ask that you step down. 15 Please do me a favor, don't speak about your 16 testimony today to anybody, aside from a 17 representative from the dispatch Attorneys office 18 Mr. Otto's office, or from Mr. Mann's office. 19 They will identify themselves 20 appropriately. 21 THE WITNESS: Yes, ma'am. 22 MS. PIEPER: Judge, I am going to call a 23 witness out of order to get him out of here. 24 One of my other witnesses hasn't arrived 25

1	yet.
2	The State will call Mike Cromwell.
3	
4	MICHAEL CROMWELL,
5	
6	who, being first duly sworn to tell the
7	truth, the whole truth, and nothing but the
. 8	truth, was examined and testified as
9	follows:
10	
11	THE CLERK: Please be seated.
12	And state your name and spell it for
13	the record.
14	THE WITNESS: Michael Cromwell,
15	M-i-c-h-a-e-l C-r-o-m-w-e-1-1.
16	THE COURT: You may proceed.
17	MS. PIEPER: Thank you.
18	
19	DIRECT EXAMINATION
20	
21	BY MS. PIEPER:
2.2	Q. How are you employed?
23	A. I am a senior crime scene analyst
24	with the Las Vegas Metropolitan Police
- 25	Department.

And how long have you been worked with 1 Q., Metro? 2 Approximately 5 and a half years now. 3 Α. And on November 5, 2013, were you working on Q. 4 that day? 5 Yes, ma'am. Α. 6 And were you working with other people? Q. 7 I was. Α. 8 And were you called out to sort of process, 9 Ο. take photographs of a vehicle? 10 Α. I was. 11 Q. Okay. 12 And can you tell the Court where was that 13 at? 14 It was on South Eastern and Ogden Avenue, 15 Α. that intersection. 16 Q. When you show up on scene, are you wearing a 17 uniform? 18 A dress code. Α. 19 Are you dressed in a uniform as if you are a 20 Q. patrol officer? 21 No. Α. 22 Do you show up in a marked patrol vehicle? Q. 23 We do not. Α. 24 Essentially you arrive on the scene in 25 Q.

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1 street clothes and you have an unmarked vehicle? 2 Α. Typically, yes. When you showed up on scene in regard to 3 Q. this car, who else was with you? 4 5 Senior crime scene analyst Erin Taylor was Α. with me. 6 -Q. Besides Erin and yourself anyone, did 7 anybody else show up with you? 8 Not with me, but homicide detective Bob 9 Α. Rogers was on scene when we arrived. 10 Q. When you got to the vehicle, explain what 11 you did? 12 13 A. When we got to the vehicle, we met with detectives on scene, as well patrol officers. 14The vehicle was parked along the east curb 15 of the northbound lanes of Eastern, north of the 16 intersection. 17 18 We documented that vehicle using photographs and notes. 19 And then once we had a search warrant, we 20 entered that vehicle to document the interior. 21 Q. Document the interior, when you document the 22 outside, you take pictures, look around the vehicle 23 to see if you see anything of evidentiary value? 24 25 A. We take pictures to show what we are taking

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H.

a picture of, and any specifics inside or around. 1 Once the search warrant was obtained, then Q. 2 you opened the doors to the vehicle, and pictures 3 are taken inside, is that correct? 4 That's correct. Α. 5 Once you guys -- after obtaining the search Q. 6 warrant, the car was opened up; are you the person 7 that took the pictures? 8 Yes. Α. 9 What is the difference between what you do Q. 10 and what Erin does? 11 We have multiple crime scene analysts. Α. 12 Ms. Taylor, when are working with her in Q. 13 regards to this case, what is the difference between 14 what you did, what Ms. Taylor did, or what any other 15 the crime scene analyst did? 16 A. When we work a scene or a crime with 17 multiple analysts, we divvy up the duties. 18 I was responsible for documenting the 19 vehicle and the scene of the vehicle, using 20 photography, and the writing the crime scene 21 report. 22 Ms. Taylor was responsible for recovering 23 and impounding evidence on the scene of the vehicle 24 again. 25

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1	And then both of us conducted the search,
2	processed for latent prints.
3	There's a lot of duties that we do together
4	as well.
	Q. So, even through some things are done
5	Q. 50, cross is taking every other photograph,
6	separately, she's not taking every other photograph,
7	you are.
8	Processing the actual vehicle, impounding
9	the evidence, notating it, taking pictures, those
10	are things you might do together?
11	A. The whole thing we work together on. It is
12	just the final product is divvied up.
13	Q. In regard to once you obtained the search
14	warrant, do you know if initially when you did the
15	search there were any weapons recovered in this
16	vehicle?
17	A. We did a cursory research of the vehicle
18	after we obtained the search warrant at the
19	intersection.
20	We recovered a Smith and Wesson semi-
21	automatic handgun.
22	non-memomber what caliber?
23	
	ne way know where it was located?
24	
25	A. Beneath the floht parts

1	Q. Then you continued to process the vehicle,
2	is that correct?
3	A. We did. Again we did a cursory search at
4	the scene.
5	Once that was completed, we sealed the
6	vehicle at the intersection, and had it towed back
[.] 7	to the crime scene investigation section garage, to
8	have more resources.
9	It is just a better environment to process a
10	vehicle.
11	Q. Better than processing it at the side of the
12	street where you could get hit by a car?
13	A. Exactly, or it is cold and windy.
14	Q. Then you tow the car back to the lot, and
15	are you continuing to process the vehicle at that
16	time?
17	A. We do a more thorough search of the vehicle,
18	process it for latent prints.
19	We observed on the exterior of the vehicle a
20	bullet ricochet that was documented and tested.
21	Q. Okay.
22	A. At that point crime scene analyst supervisor
23	Terry Martin was assisting with the processing of
24	that vehicle.
25	Q. He didn't go out to the scene, but was where

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the vehicle was later taken to? 1 A. That's correct. 2 Were the latent prints done on the scene or 3 Q., done back at the crime lab? 4 Back at the crime lab. 5 Α. Eventually did you learn that, or did Q. 6 another detective learn information that caused them 7 to go back and search that vehicle again, not search 8 again search, but did the search continue for 9 another gun? 1.0Yes. 11 Α. Were you on scene for that? Q. 12 I was on scene. The detective stayed with Α. 13 the car, waiting for a tow to come back. 14 At that point information was obtained that 15 there may be a second gun in the vehicle, and where 16 that gun was. 17 He looked in that area, saw the gun, stopped 18 right there, and we were called back to recover the 19 gun and document its location. 20 The car had already been at Metro's crime Ο, 21 lab, and you guys left, and then were called back? 22 A. Yes, it was still at the crime lab. It had 23 not been touched. 24 We were waiting on a tow to come back and 25

pick it up. 1 And take it to the tow yard? Ο. 2 A. Yes, when that was recovered. 3 MS. PIEPER: No further questions. 4 THE COURT: Mr. Otto, cross. 5 6 CROSS-EXAMINATION 7 8 BY MR. OTTO: 9 Mr. Cromwell, what time did the search 10 Ο. warrant come to you on scene? 11 Do you mind if I look at my report. Α. 12 If your memory is exhausted, you may, yes. Q. 13 I am not sure what time the actual search Ά. 14 warrant was signed. 15 We entered the vehicle 0743 hours. 16 Q. Exactly? 17 Yes. Α. 18 How did you get the search warrant? Q. 19 We were notified by the homicide detective Α. 20 on scene that a search warrant had been obtained. 21 Q. All right. 22 When you say a cursory search, what does 23 that mean? 24 A quick search. We are not going into too 25 Α.

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much detail. We are not ripping things up, tearing 1 door panels off. 2 Just a quick search to see if we see 3 anything out in the open that is of evidentiary 4 value. 5 Q. Did you ever tear door panels and upholstery 6 up? 7 Later on when we found the second gun Α. 8 underneath the steering column it was removed. 9 What was the first gun you found? Q. 10 A Smith and Wesson. I believe it was a Α. 11 model 669. 12 What caliber? Q. 13 9 millimeter. Α. 14 You have been a CSA for some number of Q. 15 years? 16 5 and a half. Α. 17 That's a common caliber handgun, is that Q. 18 correct? 19 It is pretty common, yes. Α. 20 Any do you have any idea how many exist in 21 Q . this valley? 22 A. No idea. 23 You said you searched -- you processed the Q. 24 vehicle for prints? 25

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For latent prints, yes. Α. 1 Outside the car? Q. 2 Yes, sir. Α. 3 Inside the car? Ο. 4 Yes, sir. A 5 Everywhere? Q. 6 Everywhere. Α. 7 How about the handguns? Q. 8 The handguns, senior crime scene analyst Α, 9 Taylor swabbed those. 10 We recovered them and documented them to 11 show their condition as they were recovered. 12We made them safe, unloading them, making 13 sure nothing was in the chamber, making them safe to 14 transport and to store. 15 After which, once they were returned back to 16 the lab, Erin Taylor processed them for latent 17 prints. 18 She swabbed the rough areas of the handgun 19 and the magazine for possible DNA samples. 20 Do you know the results? Q. 21 If I can refer to her --Α. 22 If your memory is exhausted, yes. Q. 23 She noted on her evidence impound report Α. 24 that the Smith and Wesson was chemically processed 25

for latent prints, with negative results. 1 As well as the Glock 22 was processed for 2 latent prints with negative results. 3 What caliber was the Glock? 0. 4 Α. 40. 5 Was there ammunition in the handguns when 6 Q. you, as you describe, made them safe by unloading 7 them? 8 Both handguns had ammunition inside. Α. 9 How full were those? Ο. 1.0 The Smith and Wesson contained one round in-Α. 11 the chamber, one cartridge, as well as 8 cartridges 12 in the magazine. 13 A full magazine, one in the chamber? 14 Q. I don't recall the capacity of the 15 Α. magazine. 16 It had 8 rounds came out. 17 The other, that's the Smith 40? Q, 18 That's the Smith 9. Α. 19 Q. Smith 9. 20 The Glock 40? 21 The Glock 40 had one in the chamber and one 22 А in the magazine. 23 Q. Did you find evidence that the guns had been 24 recently fired? 25

There is nothing we can do on scene to show Α. 1 that they have been recently fired. 2 Did you find any evidence of gang Q. 3 paraphernalia in the vehicle? 4 Not that I recall. Α. 5 Insignias, papers, anything, posters, 0. 6 anything? 7 A. We didn't see anything to document. 8 The detective who told you that the search Q. 9 warrant had been issued was Detective Bob Rogers, is 10 that correct? 11 That's correct. Α. 12 He is from homicide at Metro? ο. 13 Α. Yes. 14 MR. OTTO: That's all for now. 15 THE COURT: Mr. Mann, cross. 16 MR. MANN: Thank you, Your Honor. 17 18 CROSS-EXAMINATION 19 BY MR. MANN: 20 Mr. Cromwell, you arrived on scene at 7:10? Q. 21 Yes. Α. 22 You were in the same vehicle as Ms. Taylor? Ο. 23 We drove separate vehicles. We arrived at 24 Α. the same time. 25

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Q. Do you normally work with Ms. Taylor?
A. We are on the same squad. There are some
cases we work together, and some we work
individually.
Q, When you are called out, are you called out
individually, and you just appear at the scene, or
is it that you 2 always work in tandem?
A. It is random. In this particular case she
came after me in seniority.
When I was assigned the call, based on the
call type, my supervisor sent 2 people.
He chose myself and Ms. Taylor to go along.
Q. You arrived at 7:10, and she arrived roughly
about that same time?
A. We followed each other there.
Q. Did you leave from the same location?
A. Yes.
Q. From MLK?
A No. Our office is on Jones and the 215, the
south side of town.
Q. Do you know what time you were dispatched?
A. It would have been I think we left around
6:35 in the morning.
By time got suited up, it might have been
6:30.

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Suited up, what does that mean? Q. 1 Gotten ready to run calls. Put on our Α. 2 uniform, our crime scene vest. Our duty belt, 3 boots, just to get ready for the day once we get 4 into the office. 5 Q. Okay. 6 And when you arrived, you said you had 7 conversations with officers and detectives on the 8 scene, correct? 9 That's correct. Α. 10How many detectives were there? Q., 11 At the scene of the traffic stop, Detective 12Α. Rogers was the only detective there. 13 And how many officers were there? Q., 14There were several. I don't recall the 15 Α. count. 16 Did you ever have a conversation with the Q. 17 officer or officers who conducted the stop? 18 No. Α. 19When you arrived, and before the search Q. 20 warrant, you became known of the search warrant, you 21 took pictures of the vehicle? 22 A. I did. 23 And those pictures were of the outside of Q. 24 the vehicle? 25

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When I arrived on scene, the front driver Α. 1 and the rear driver's side doors were both open. 2 Pictures were taken to show the overall 3 views of the car from the outside, as well as 4 whatever interior views I could obtain from the 5 outside of the vehicle through the open doors. 6 Q. Did you only take pictures through those 7 open doors staying, I think as you were implying, 8 outside of the car? 9 Yes, Α. 10 Did you ever take pictures from the other Q. 11 side of the car before the search warrant? 12 No. Α. 13 Were the other side, which is also known as Q. 1415 the passenger side of that vehicle, were those windows up or down? 16 I believe all of the windows were down. Α. 17 Q. You didn't take any picture through the 18 windows? 19 A. I might recall that I took some pictures 20 through the windows. 21 Do you know how many pictures you took 0. 22 before the search warrant? 23 A. I don't recall. 24 Is there anyway or any sort of notes that ο. 25

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you do during your investigation of how you conduct 1 the investigation? 2 I don't understand the guestion. Α. 3 When you are taking pictures, do you have Q. 4 like a pad of paper where you write down I took so 5 many picture of this, so when you go back and start 6 to process the pictures, your able to remind 7 yourself with these notes of what happened? 8 We are going to take notes on specific Α. 9 items; for instance, when we looked at the firearm 10 underneath the seat, we note that was a firearm. 11 We note all of the information on that 12 13 firearm. Typically, with digital photography these 14 days, there is no need to write down exactly what --15 the content of all of your pictures. 16 If your scene documentation is good enough, 17 you should be able to look at the picture and 18 explain exactly what that is. 19 Q. So my question is, sometimes you can zoom in 20 on an item --21 Yes. Α. 22 -- and you may not be able to tell what the Q. 23. surrounding thing is for the time of the picture; 2.4 and, so, I didn't know if there was a way for you to 25

document when that particular picture was taken, so 1 you know that you don't mix it with another picture 2 similar at a later time? 3 When we do a series of photographs, it is Α. 4 standard procedure to do 3 sets. 5 We do an overall view to show the room or 6 the scene. 7 If you have a specific item in question, you 8 do a relationship shot, a relationship photograph, 9 which means you are going to show that item of 10 interest in comparison to something else, so you can 11 place it in that scene. 12 Then you also do a close-up photograph to 13 show what it is you are looking at, or the focus. 14 So with those series of photos, you would be 15 able to place any piece of evidence, or any item 16 that you are interested in, in the scene. 17 As far as time stamping the photos, the 18 electronic data on every photo is time stamped at 19 the point the picture was taken. 20 So assuming the time on the camera is 21 correct, it is going to be time stamped with all of 22 the settings that the camera was on as well, when 23 that photo was taken. 24 That's essentially called a metadata? Q. 25

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1	A. Yes.	
2	Q. As part of your normal procedure, do you	
3	verify that the camera that you are using has a full	
4	battery, has the right clock, date, time on it,	
5	things like that?	
6	A. Typically after the time change we will	
7	check the date and time to make sure it is correct.	
8	Q. Other than that, do you do any further	
9	checking before you go out on the scene?	
10	A Yes. You make sure your batteries are	
11	full.	
12	Q. And the date and time?	
13	A. Not everyday, not every scene.	
14	Q. Okay.	
15	And when you prepared your report, you	
16	prepare it to be submitted to the detectives,	
17	correct?	
18	A As well as the courts, yes.	
19	Q. As well as the dispatch Attorneys office?	
20	A. Yes.	
21	Q. So obviously you prepare your report	
22	separately from the pictures that you have taken,	
23	3 correct?	
2	A. It is different documents. The pictures ar	e
2	5 obtainable. They can be viewed.	

The report is written as its own, as its own 1 entity. One should be able to read the report and 2 have an idea of what is going on, what happened at 3 the scene. 4 The photos, when you look at the photos, you 5 should be able to refer back to the report and see 6 what you are looking at, and know what you are 7 looking at. 8 Okay. Q. 9 So at the point of 7:10 until 7:43, when you 10 entered the car, were you able to observe the car 11 that whole time? 12 Yes. Α. 13 Do you know if anyone other than yourself Q. 14 and Ms. Taylor came close to the car? 15 Not that I recall, other than Detective Bob Α. 16 and everybody stayed outside of the vehicle. Rogers, 17 Okay. Q. 18 Did anyone touch anything inside the car 19 between 7:10 and 7:43? 20 Not to my recollection, no. Α. 21 Okay. Q, 22 When you arrive, do the officers essentially 23 turn over this vehicle to you, and you are 24 essentially the one in control of the vehicle? 25

It is us as well as the homicide detective. Α. 1 Q. Do the homicide detective enter the vehicle 2 with you or -- rephrase. 3 Does the homicide detective sometimes assist 4 you in collecting evidence, and this is before the 5 search warrant? 6 Before the search warrant. Α. 7 Q. We will get to after search warrant in a 8. second. 9 A. We didn't do a search of the vehicle before 10 the search warrant. 11 At that point we were just taking pictures 12 from outside of the vehicle. 13 Q. Let me back up. 14 You are taking pictures outside of the 15 16 | vehicle. Did the detective walk around with you point 17 and to you what pictures he wanted taken? 18 A. No. We know what pictures to take. 19 Q. Was the detective near you when you were 20 taking those pictures? 21 A. I am sure he was. 22 Q. How near? 23 He could have come up and said something to Α. 24 25 me.

He could have been on the street corner or 1 in one of the patrol cars. 2 You have no independent recollection? 3 Q. We were all in same area and were Α. 4 communicating back and forth. 5 Q. Okay. 6 Now, when you did a picture inside the car 7 from outside the car, you said the doors were open? . 8 Yes. Α. 9 And you took a series of pictures? Q. 10 Yęs. Α, 11 Did you observe the Smith and Wesson? 12 Q. I was told when I got out to the scene that Α, 13 a handgun was observed underneath the right front 14 passenger seat of the vehicle. 15 All you could see was the lower end of the 16 grip of the gun. That's what we were taking a 17 picture of. 18 It was difficult to see that lower end of Q. 19 the grip of the gun, correct? 20 A. You could see it. I wouldn't say it was 21 difficult, but you could see a very small portion of 22 23 it. Okay. Q. 24 And, so, does someone point out to you where 25

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that gun was, where that butt of the gun was? 1 We were advised when we arrived on scene. Α. 2 Who advised you? Q. 3 I think that was homicide detective Bob Α. 4 Rogers. 5 Q. And when you were taking pictures from 6 outside the car, were you zooming in on that 7 location? 8 A. I was. 9 And did you ever move anything, touch Q. 10 anything? 11 A. Prior to the search warrant? 12 Q. Correct. 13 No. Α. 14 When you conduct your searches, are you Q. 15 wearing anything on your hands? 16 We are wearing latex gloves. Α. 17 What color are those gloves? Q. 18 We have blue ones and orange ones. Α. 19 Blue ones and orange ones? Q. 20 Yes. Typically, most days I carry orange Α. 21 gloves with me. 22 Other CSAs may have blue ones in their 23 supply. 24 MR. MANN: Court's indulgence. 25

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While Mr. Mann is finding what THE COURT: 1 he is looking for, we will take a bathroom break. 2 3 (Recess taken.) 4 5 Your Honor, may I approach to MR. MANN: 6 have these marked as proposed exhibits? 7 THE COURT: YOU may 8 May I approach? MR. MANN: 9 THE COURT: You may. 10 Mr. Cromwell, I am approaching with a series Q. 11 of photos, Moten Defense B through K; can you look 12 through those photographs and see if they appear to 13 be the photographs you took before you entered the 14 vehicle? 15 They appear to be. Α. 16 Is that, in your opinion, or from your Q. 17 understanding, is that, B through K, the whole group 18 of photographs that you took before you entered the 19 vehicle, or may there possibly be more? 20 There are other photographs we took prior to Α. 21 the entering vehicle, which include overall views of 22 the car, the intersection. 23 Did you happen to bring your pictures that Q. 24 you took from your investigation? 25

We don't supply them to the Court, no. Α. 1 You didn't bring them with you? Q. 2 No. Α. 3 And you, as we stated before, provided ο. 4 digital copies to the detective and to the dispatch 5 Attorneys office? 6 We submit them to the department's server, Α. 7 which loads them onto the server. 8 It is up to the detectives, dispatch 9 Attorneys, defense to request them from Metro's 10 records. 11 Q. All right. 12 So showing you Defendant's Exhibit B, what 13 does that appear to be? 14 This is a zoomed in photograph looking into Α. 15 that open rear passenger door, focused on the lower 16 seat portion of the rear of the front driver's seat. 17 Okay. Q. 18 And showing you also C, D, E and F, do those 19 seem to be similar photos of the same area? 20 A. Yes, they do. They have different 21 brightnesses. Sometimes it is hard to get the 22 lighting right, where you have your flash directed. 23 In these type situations, I choose not to 24 delete any photographs. 25

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I submit them all. 1 Do those truly and accurately depict what Q. 2 you took before you entered the car? 3 Yes. Α. 4 MR. MANN: I am moving for the admission of 5 B through F. 6 No objection by the State. MS. PIEPER: 7 MR. OTTO: No objection. 8 THE COURT: Moten B, C, D, E and F are 9 deemed admitted. 10 MR. MANN: Thank you, Your Honor. 11 Then showing you G through J, do those Q. 12 photos look like the photos you took before you 13 entered the car? 14 Yes, sir. Α. 15 Okay. Q. 16 And do they fairly and accurately depict 17 what you took a picture of at that time? 18 They do. Α. 19 And what do they appear to be a picture of? 20 Q, This is looking into the front driver's side Ά. 21 door that was open when I arrived. 22 Okay. -23 Q. And were you specifically pointing your 24 camera at any specific thing, or just the general 25

front passenger side? 1 A. Just the general front passenger 2 compartment. 3 Q. Showing you --4 MR. MANN: Your Honor, I ask that G through 5 J be admitted. 6 MS. PIEPER: No objection by the State. 7 THE COURT: Mr. Otto. 8 MR. OTTO: No objection. 9 THE COURT: G through J are deemed admitted 10 for Moten. 11 Q. Showing you Defendant's K, what does that 12 appear to be a picture of? 13 A. This is an image through the front passenger 14 window. 1.5 Q. Was that taken before you entered the 16 vehicle? 17 A. Yes, otherwise I would have opened the door. 18 Q. Fair enough. 19 And does that truly and accurately depict 20 what it looked like before you, at the time that you 21 took this picture? 22 A. Yes. 23 MR. MANN: I move for Defendant's Exhibit K 24 25 to be admitted.

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MS. PIEPER: No objection from the State. 1 MR. OTTO: No objection. 2 THE COURT: K is deemed admitted. 3 Okay. Q. 4 Looking at these admitted photographs, 5 looking at K, this is the front area, correct? 6 Yes. Α. 7 Okay. Q. 8 Do you see any gun from this front picture 9 that you took on K? 10 No, sir. Α. 11 Showing you G, that is the front passenger Q÷ 12 compartment as well, correct? 13 Yes, sir. Α. 14 And does that appear to -- do you see any 0. 15 gun in that picture? 16 No, sir. Α. 17 And showing you Exhibit H, was there taken Q . 18 before you entered the vehicle? 19 It appears -- it is an image that we would Α. 20 take right before entering the vehicle. 21 Again, without the time stamp on it, I 22 believe I went back around and re-photographed the 23 inside, once we obtained the search warrant. 24 It is a picture of the front passenger 25

assumedly before we entered the vehicle. 1 Q. So quite possibly H is a picture that you 2 took after the search warrant was conducted, . 3 correct? 4 Actually I will tell you it is after the Α. 5 search warrant was conducted. 6 There's the search warrant return on the 7 front passenger seat. 8 Q. And in looking at the windows, does that 9 appear to be were you where the car was initially 10 stopped? 11 A. No, that appears to be, I believe, another 12 CSA went to the tow yard after we were done 13 processing. 14That's not a picture you took? Q. 15 No. Α. 16 That would be -- H is no longer a picture Q., 17 that you say you have taken? 18 That's correct. Α. 19 Showing you I, does that appear to be a 20 Q., picture that you took before you entered the 21 vehicle? 22 Yes. 23 Α. Q. And what is that showing? 24 Again, the front passenger compartment. Α. 25

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Is there any gun that you can observe on the Q. 1 front passenger area? 2 No, sir. Α. 3 And also J, same thing? Q. 4 The same thing, kind of looking more towards A . 5 the floorboard, versus across the seats. 6 Q. And you don't observe any gun in those 7 pictures? 8 No. Α. 9 Then showing you B -- will you look through Q. 10 at B through F, and pull out the picture that was 11 widest before you zoomed in more? 12 The widest angle? Α. 13 Yes. 0. 14 It should be these 2. They are a little Α. 15 brighter. 16 How strong is your lens on your camera? Q. 17 As far as focal length? Α. 18 I think it is 17 to 55 millimeter. Α. 19 In the digital realm, we usually talk about Q. 20 how many times it magnifies. 21 Do you know how to convert your lens into 22 how many times it can magnify? 23 I don't. Α. 24 Would you say that this is something that Q. 25

you can zoom in pretty well on? 1 You can zoom in a little bit. I can't give Α. 2 you --3 Is it a -- what kind of camera is it? Q. 4 A Canon 60 D. Α. 5 Is that DSLR? 6 ο. A digital SLR, yes. Α. 7 Is that something you can remove the lens Q. 8 and put on the different lens? 9 Yes. Α. 10 It is more of professional camera instead of 11 Q. a point and shoot? 12 A. Yes. 13 It is obvious from these pictures that you Q . 14 zoomed in using the lens of your camera, correct? 15 That's correct. Α. 16 And it was at this point that from the Q. 17 zooming in that you are able to see the gun, not 18 before? 19 You were able to see the gun with the naked Α. 20 eye from the outside of the vehicle. 21 Sometimes with the way cameras work, it is 22 hard to get the angle that you can get with your 23 head from outside of the vehicle. 24 And the lighting as well, what happens a 25

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lot, why you see this -- some being brighter, you 1 have to adjust the flash. 2 Sometimes they have an automatic flash. So, 3 when it is going to hit this jacket in the 4 forefront, it might shut down the flash, making 5 everything in the distance a lot darker. 6 You have to adjust the flash for area of the 7 picture that you want. 8 Showing you B and F, they appear to be a box Ο. 9 on the ground in that picture? 10 Yes. Α. 11 In picture F, do you see the gun in this Q, 12 particular picture? 13 I do. Α. 14Can you point to it? 15 Q. It is on the left-hand side of the box. 16 Α. It is viewable under the seat. In the photo 17 it is going to be to the right of the center console 18 of the vehicle, and left of the box on the floor. 19 MR. MANN: Can I borrow a marker, Your 20 Honor? 21 Your Honor, do you mind if I have the 22 witness mark the picture that's been admitted? 23 THE COURT: No. 24 Can you circle the area that you are saying Q. 25

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that the gun was located in that picture? 1 Α, Indicating.) 2 That is the Defendant's F, correct? Ο. 3 MS. PIEPER: It says F on the back. 4 And in picture B, can you circle where the 5 Q. gun is in this picture? 6 It is not as viewable. You can see the 7 Α. textured portion of the back rib. 8 The lighting on this is not as good as that 9 10 one. You can partially see it. It is going to be 11 12 in this area. MS. PIEPER: can you have him initial it? 13 Q. Can you initial and put your signature and 14 the date. 15 Now in these 2 pictures, you see this box 16 here? 17 Α. Yes. 18 Does the angle of the box move? 19 ο. No, those pictures are taken back to back. 20 Α. These pictures, the angle of the box would Q. 21 not have moved at all? 22 The angle that I was standing may have 23 Α. moved. 24 I could be standing an inch this way or that 25

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The angle of the box wouldn't move. way. 1 When he is asking about the MS. PIEPER: 2 angle of the pictures, those pictures are --3 MR. MANN: B and F. 4 MS. PIEPER: Thank you. 5 All right. Q. 6 Showing you Defendant E, can you say the gun 7 in that picture? 8 I can't see it in that picture, no. Α. 9 Showing you Defendant's C, can you see the 10 Q. gun in that picture? 11 Again, it is going to be dark. I can't see Α. 12 it from that position. 13 Defendant's D, do you see the gun in that Q. 14 picture? 15 In that resolution, no. Α. 16 So at 7:43 you get the call, or you get Q. 17 instructions that you can now enter the vehicle? 18 That's correct. Α. 19 And you ultimately enter the vehicle? 20 Q. Yes. Α. 21 Was Detective Rogers there with you? Q. 22 He was, yes. 23 Α. Did he enter the vehicle as well? Q. 24 Typically I am going to take photographs Α. 25

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first. 1 But he was along side me, I am sure, but we 2 are going to document the inside of that vehicle 3 prior to disturbing anything. 4 Okay. Q. 5 And when you entered the vehicle, you took 6 pictures of the gun that you found? 7 Yes. Α. 8 And where was the gun located when you found Ο. 9 it? 10 Again, it was under the front passenger seat Α. 11 of the vehicle. 12 It was not on the front passenger seat? ο. 13 It was underneath. Α. 14 Okay. Ο. 15 After going through the vehicle on the 16 scene, do you know how many pictures you took once 17 you received the search warrant? 18 I don't. Α. 19 Is there any sort of documentation that Q. 20 would indicate how many pictures you have taken? 21 They are listed in the Las Vegas Α. 22 Metropolitan Police Department server. 23 We can look up based on our P number, and 24 the event number, which pictures are which. 25

The digital file numbers of the pictures, is Ο. 1 there any rhyme or reason as to the number code on 2 the digital file? 3 You would have to ask the photo lab Α. Δ personnel. 5 You don't have personnel knowledge to Q. 6 indicate what the picture file name is? 7 As far as Las Vegas Metropolitan Police Α. 8 Department server goes, when they upload them, 9 typically the first picture on the card, the first 10 picture that is downloaded is going to be batch 11 number such and such, image number one. 12 Then the imagine numbers will move up 13 subsequently from there. 14 The batch number that you are talking about, 15 Q. is there any significance to that batch number or is 16 it just the next one in line? 17 I am not sure if they are sequential or not. Ά. 18 When you go to look at the pictures you have 19 Q. taken after you submitted them to the server, do you 20 go on the server, or do you look at your own 21 pictures that you have taken? 22 They are uploaded to the department server Α. 23 on base, where we can pull up and search for 24 reports, photographs, based on our personnel number, 25
department event number, location. 1 There is number of search options. 2 You indicate; hey, I am Michael Cromwell, P ο. 3 number whatever, and it is for this particular 4 event, and then it catalogs what you upload under 5 that event? 6 Yes. When you log on, it is going to log Α. 7. you on when you originally sing into a computer in 8 the office. 9 When you open up the on-base program, you 10 can search. I can search for the event number, and 11 pull up every photograph, any photos uploaded to the 12 system for this event number. 13 I can narrow that search and put in my 14 initial and P number under the search parameter of 15 who took the pictures. 16 That would narrow the search down to the 17 photos taken for this event number by the personnel 18 number that you listed. 19 Q. Okay. 20 And you had testified during direct 21 examination that the vehicle was then taken after 22 you had done an initial search to the crime scene 23 garage, correct? 24 That's correct. Α. 25

And it was there that you further conducted 1 Ο, a search? 2 Yes. Α. 3 At that time you did not find a second gun? Ο. 4 We removed some clothing items, but it was Α. 5 actually homicide detective Bob Rogers who 6 physically located the gun, based on interviews 7 other detectives were doing at that time. 8 Q. So you were not there when detective Rogers 9 found the gun? 10 We responded immediately after. Α. 11 Was it Detective Rogers that called you? ο. 12 Yes. He called our supervisor. Α. 13 How far away were you when you got that Q. 14 call? 15 A couple of miles. Α. 16 And you just turned around? Q. 17 Yes. Α. 18 And had Detective Rogers removed the gun ο. 19 before you have arrived? 20 No. Once it was located -- he will have to Α· 21 testify as to what he did. 22 That's fine. 23 Ο. Presumably it was left hands off once you Α. 24 see it. 25

Q. You are not sure what Detective Rogers did, 1 but all you know is that when you arrived, you saw 2 the gun in what you believed was the location it was 3 found? 4 Yes. All I can testify to is that that was 5 Α. the original location that the gun was in when I 6 arrived. 7 Q. When you were searching the car, was the 8 steering column removed like that? 9 No. 10Α. Q. So when you have came back, the steering 11 column was then down, and you could then obviously 12 see the gun? 13 Yes. Α. 14 Q. Did you take apart anything else during your 15 initial search in the crime scene garage, any part 16 of the car? 17 A. I don't think we did. Typically we are 18 going to look for areas that appear to be removed or 19 disturbed. 20 Sometimes the vehicles you see areas that 21 are cut or ripped out. You can see there has been 22 damage to it. 23 It is kind of a sign that something may be 24 underneath. We didn't note anything like that. 25

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There was area in the vehicle that the 1 carpeting was a little bit pulled up. 2 I believe it was on the steering column side 3 of the front passenger seat. I am sorry, the center 4 console side of the front passenger seat. 5 We looked in that there. There was nothing 6 in that. 7 Would you consider the steering column to be Q . 8 the same as the floorboard? 9 No. Α. 10 Your reaction just then in that question is Ο. 11 that they are obviously different? 12 The floorboard is the floorboard. Α. 13 The steering column is what holds the 14 steering wheel up and the dashboard in that area. 15 If someone was to say the gun was found in Q. 16 the floorboard would be significantly wrong? 17 The gun --Α. 18 I can rephrase it. Q. 19 The 40 caliber weapon that was found 20 initially in the steering column, someone indicated 21 that that was found in the driver's floorboard, that 22 would be obviously wrong, correct? 23 A. Yes. 24 And you find it hard to believe that someone Q. 25

could mistake the 2? 1 A. A typo is a typo, but there's a floorboard. 2 I consider the floor being the floor, and 3 that includes under the seat. 4 It includes the rear passenger, the floor of 5 rear passenger seat. 6 The front passenger seat. 7 The front driver's seat. 8 Also the glove compartment and the dash, 9 they are all separate parts of the vehicle. 10 Q. Beside you and Taylor and Rogers, was there 11 anyone else in the crime scene garage conducting the 12 search? 13 Crime scene analyst supervisor, Terry Α. 14 Martin. 15 He is your supervisor? Q. 16 That's correct. Α. 17 I assume it is a he. Q. 18 Yes. Α. 19 And did he participate in the search? Ω. 20 He was in and out. Α. 21 Ms. Taylor and I were both primary on it, 22 conducting most of the search. 23 He was intermittent. He helped us out with 24 some aspects. 25

We were more involved, Ms. Taylor and I. 1 When you entered the car at the scene after 2 Q.. receiving the warrant, were you handed a piece of 3 paper with the warrant, or were you just indicated 4 by someone that you had received the warrant? 5 I got word of mouth. Α. 6 You didn't have any documentation that said 7 Ο. warrant approved, or anything to that aspect? 8 I believe typically it is the homicide Α. 9 sergeant that obtains that search warrant signed by 10 the Judge. 11 That information would be passed on from her 12 to her detective. 13 A lot of times they will do a telephonic 14 search warrant. 15 Did you see the paperwork from this Q. 16 particular search warrant placed in vehicle before 17 it was sealed to go to the crime scene garage? 18 Yes. Α. 19 Who put that in that? Q. 20 Detective Rogers. Α. 21 Did you see anyone give Detective Rogers Q. 22 that paperwork? 23 I don't recall. Α. 24 No further questions. MR. MANN: 25

THE COURT: Redirect? 1. MS. PIEPER: One question. 2 May I approach the witness? 3 You may. THE COURT: 4 5 REDIRECT EXAMINATION 6 7 BY MS. PIEPER: 8 Showing you what's been admitted as State's Q. 9 15, we have been talking a lot about the car and the 1.0 gun, and is this the car we are talking about? 11 Yes, ma'am. Α. 1.2MS. PIEPER: Thank you. 1.3 THE COURT: Any follow-up to Ms. Pieper's 14 question? 15 MR. OTTO: Nothing. 1.6 MR. MANN: Nothing, Your Honor. 17 THE COURT: Thank you for your testimony. 18 You may step down. 19 Don't discuss your testimony with anybody 20 during the pendency of the case, aside from a 21 representative of the State or Mr. Otto's office or 22 Mr. Mann's office. 23 Call your next witness, State. 24 MS. PIEPER: before I call our next witness, 25

1 can we approach the bench briefly? THE COURT: Sure. 2 3 (a bench conference was 4 5 had.) 6 MR. OTTO: Your Honor, to be clear on 7 8 the scheduling, Monday we will start at one. THE COURT: And go no later than 4. 9 THE COURT: State call your next 10 witness. 11 MS. PIEPER: The State calls 12 13 Christian Parquette. 14 CHRISTIAN PARQUETTE, 15 16 17 who, being first duly sworn to tell the 18 truth, the whole truth, and nothing but the 19 truth, was examined and testified as 20 follows: 21 THE CLERK: Please be seated. 22 Please state your name and spell it 23 24 for the record. THE WITNESS: Christian Parquette, 25

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P-a-r-q-u-e-t-t-e. 1 2 DIRECT EXAMINATION 3 4 BY MS. PIEPER: 5 How are you employed? Q. 6 I am sorry? Α. 7 How are you employed? Q. 8 I am a police officer for the Las Vegas Α. 9 Metropolitan Police Department. 10 Can you speak up? Q, 11 I am a police officer with the Las Vegas Α. 12 Metropolitan Police Department. 13 How long have you been with Metro? Q. 14 Approximately 5 years. Α. 15 What area of command do you work for? Q. 16 Downtown area command. Α. 17 When you go to work, do you dress in uniform Q. 18 and drive a marked patrol vehicle? 19 Yes. Α. 20 I will draw your attention to November 5, Q. 21 2013; were you working that day? 22 Yes. Α. 23 What was your shift? Q. 24 Graveyard. Α. 25

Q. And what time does graveyard start, and what 1 time does it end? 2 A. It starts at 10:00 o'clock at night, and we 3 get done at 8 in the morning. 4 At approximately 4:45 in the morning, did 0. 5 some information come out over dispatch? 6 Α. Yes. 7 And what was information in regard to? Q. 8 There was a shooting that occurred in the Α. 9 next area of command, south central, that we border, 10 and there was a description of a vehicle. 11 Q. When you say you border it, with regard to 12the Clark County, is there certain areas that Metro 13 splits up, northeast, northwest, things of that 14 nature? 15 Yes. Α. 16 And you said it was in the area of command 0. 17 next to you? 18 Yes. Α. 19 Q. Are you allowed to go into other area 20 commands? 21 Α. Yes. 22 As you are driving, describe for Court what Q. 23 happened as you are driving, and you hear the call 24 come out? 25

There was a call that there was a shooting Α. 1 that happened on our border, which is by Sahara, so 2 the vehicle description that was broadcasted was a 3 dark gray or silver Dodge Magnum with dark tinted 4 windows, and that was it. 5 So I assigned myself through dispatch to go 6 to attempt to located the vehicle, at which time I 7 was traveling south on Eastern and observed a silver 8 Dodge Magnum with extremely dark tinted windows 9 coming north down Eastern and St. Louis. 10 What did you do next? Ο. 11 I advised dispatch that I possibly located 12Α. that suspect vehicle related to the incident, and I 13 waited for backup officers to arrive, upon which we 1.4 conducted a felony vehicle stop on it. 15 What is a felony vehicle stop? Q. 16 A felony vehicle stop is where we stop the Α. 17 vehicle, and we are not going to approach up to the 18 window to the severity of the crime. 19 They could be armed and dangerous. And, so, 20 we stop the vehicle, and we called them out, each 21 occupant one at a time. 22 We told them to put their hands up. Our 23 weapons are drawn. 24 We have them We bring them back towards us. 25

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roll all of their windows down at which point each 1 occupant will come out of the vehicle until each one 2 is taken into custody. 3 Then we make sure no one else is in the 4 We clear the vehicle out. vehicle. 5 Q. When you are giving this information or 6 shouting these commands, is it like through a Bull 7 Horn? 8 A. Yes. Every situation is different. Some 9 is, some is not. Some we yell out. Some is a Bull 10 Horn situation, 11 Do you remember what cross streets, what Q. 12 corner the vehicle was stopped at? 13 Eastern and Ogden. Α. 14 Were the occupants taken out of the vehicle? Q. 15 Yes. Α. 16 Q. And taken into custody? 17 Yes. Α. 18 And do you see those occupants here today in Q. 19 courtroom? 20 Yes. Α. 21 Q. Do you remember which person was driving and 22 which person was in -- there was a driver in the 23 vehicle, correct? 24 Correct. Α. 25

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Q. Do you see the driver in the courtroom 1 today? 2 Yes, I do. Α. 3 Q. Can you point to him and describe an article 4 of clothing, and where he is sitting in the table to 5 my right of 4 people? 6 A. He is the second one from my right, right 7 now in the blue shirt. 8 He has tattoos on his chest. 9 He is sitting between 2 gentlemen, for lack ο. 10 of a better word that are wearing suits, correct? 11 MS. PIEPER: Your Honor, may the record 12 reflect that the witness identified Defendant 13 Washington? 14 THE COURT: It will. 15 Q. Do you see -- was there another person in 16 17 the vehicle? Yes. Α. 18 Q. Where was that person sitting in the 19 vehicle? 20 A. He was in the back-seat. 21 Q. Driver's side or passenger's, if you can 22 recall? 23 I can't remember. Α. 24 He was in the back-seat, correct? Q. 25

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Α. Yes. 1 Do you see him in the courtroom today? 2 Ο, Yes. Ά. 3 Point to him an describe an article of Q. 4 clothing he is wearing. 5 He is to the far left in the blue shirt and Α. 6 pants with orange sandals. 7 To his left is a gentleman in a yellow tie, Ο. 8 is that correct? 9 Correct. Α. 10 MS. PIEPER: Your Honor, I ask that the 11 record reflect that the witness identified Defendant 12 Martell Moten. 13 THE COURT: It will. 14 Q. Once they are taken into custody, what 15 happens next? 16 When they are taken into custody, we clear Α. 17 the vehicle out, make sure no other outpatients are 18 in there, hiding, laying down. 19 At which point the details were updated that 20 it became a homicide. 21 Due to that, we were waiting for homicide to 22 help us. 23 Q. You wait for homicide to get there, because 24 you don't want to do anything that would jeopardize 25

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the homicide investigation? 1 MR. OTTO: Objection, leading. 2 Q. Why did you sit there and wait for the 3 vehicle? 4 Due the evidentiary value, we don't want to Α. 5 go inside the vehicle and start asking them 6 questions. 7 That's going to be turned over to the 8 homicide detectives for their investigation. 9 Did you pat the Defendant down for weapons? Q. 10 A. Correct. 11 And did you ask for consent to search the Q. 12 vehicle? 13 We did ask, yes. Α. 14 What happened? 15Q. They said yes we could consent, at which Α. 16 point, when they exited the vehicle, the doors were 17 left open from when they exited. 18 So myself and my partner, we had consent 19 from the driver to search the vehicle, at which time 20 we walked up to the back left door, which was open 21 of the vehicle, the back passenger left side. 22 And we could see the butt of a gun sticking 23 out from the right front passenger seat on the 24 floorboard. 25

Okay. Q. 1 Did you go in and seize that weapon? 2 No. Ά 3 You then waited for homicide, is that Q. 4 correct? 5 Yes. Α. 6 Did somebody show up at the scene and sort Q. 7 of identify the car; did you have anything to do 8 with that witness showing up? 9 They showed up. It was the other area Α, 10command that brought them to us. 11 I had nothing to do with it. 12You knew somebody showed up to the vehicle, Q. 13 but you had not contact with that witness? 14 Correct. Α. 15 Eventually homicide detectives showed up, Q. 16 and then did you have further contact with the 17 vehicle at or homicide at that time? 18 A. I had more contact with the homicide 19 detective. 20 Q. Once you located the vehicle, and all of the 21 occupants are taken out of the vehicle, is crime 22 scene tape put up or do you have the car isolated on 23 the side of the road? 24 It is isolated. 25 А.

No one is going in and out besides the Q, 1 central personnel, personnel that has anything to do 2 with the investigation, correct? 3 A. Correct. 4 MS. PIEPER: No further questions. 5 THE COURT: Mr. Otto, cross. 6 MR. OTTO: Yes, Your Honor. 7 8 CROSS-EXAMINATION 9 10 BY MR. OTTO: 11 You say you got a consent to search from 12 Q. which occupant of the car? 13 The driver. Α. 14 Did you get a card or anything indicating 15 Q. his consent to search? 16 Α. No. 17 You said a door was opened, and you saw the Q. 18 butt of a handgun? 19 Correct. Α. 20 Which door was open? Q. 21 The doors of the vehicle were open when they Α. 22 exited. 23 The front door was open? Q. 24 Yes. Α. 25

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It was a 4 door car? Q. 1 Both doors on the left-hand side were open. 2° Α, The driver's side and the back driver's side 3 were open. 4 And where did you see the butt of the Q. 5 weapon? 6 Underneath the front passenger seat. Α. 7 Was it dark out? Q. 8 It was starting to become daytime. Α. 9 Did you use a flashlight? Q. 10 Yes. Α. 11 How did you isolate the car from anybody Q. 12 tampering or entering it? 13 Where we stopped the vehicle, it is placed Α. 14 right there, and no one else gets to go, enter it, 15 or move clothing, anything of that 16 purpose. 17 Q. And what happened to the occupants of the 18 car? 19 They were placed in handcuffs and separated. Α. 20 Where were they put while they were 21 Q. separated? 22 In different patrol vehicles. Α. 23 In the back of the patrol vehicles. 24 They waited as well until homicide Q. 25

detectives arrived? 1 Correct. Α. 2 MR. OTTO: Nothing further. 3 THE COURT: Mr. Mann, cross. 4 5 CROSS-EXAMINATION 6 7 BY MR. MANN: 8 Q. So you get call from dispatch, shots fired, 9 correct? 10 It wasn't a shots fired call, no. Α. 11 So you a get call from dispatch that you Q. 12 were looking for silver car, Magnum? A. There was a shooting that had happened in 13 next area of command, and they described the vehicle 14 15 over the radio to us. Q. You get an announcement over the radio that 16 there is something that happened in what you said is 17 18 the south central area command, correct? 19 A. Correct, one of our bordering area of 20 commands. 21 okay. Q. From that call, what is announced over the 22 23 air? That there was a shooting that happened at a 24 Α. 25

certain location at the residence. 1 Did they say what location? 2 Q. They did. 3 Α. What location was that? Ο. .4 I don't remember the address. 5 Α. Q. Okay. 6 Do you remember the area of the address? 7 Yes. It was near Sahara and the Van Patten 8 Α. area Sherwood, which borders on our area of command. 9 Is that what they said over the air, or is 10 Q. that what you later discovered? 11 They had the exact address. I don't work 12 Α, in that area of command, so I was just attempting to 13 locate a vehicle. 14 Q. It was your recollection that they announced 15the address over the air? 16 A. Correct. 17 Q. You knew enough of the area that it was 18 somewhat near where you work? 19 Correct. 20 Α, And they over the air announce the vehicle Q. 21 correct that they believed was involved? 22 A. Correct. 23 And they announced that it was a silver or ο. 24 gray Magnum car, correct? 25

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Correct. Α. 1 With dark window tint? 0. 2 Correct. Α. 3 Anything else other than that? Q., 4 Not at the time when I spotted that vehicle. Α, 5 Did they indicate anything about the rims? Q. 6 NO. Α. 7 Did they indicate anything about how many Q.. 8 passengers were in the car? 9 I couldn't see. Α. 10 You couldn't see what they were telling you? ο. 11 Dispatch did not know how many occupants Α. 12were in the vehicle at the time. Q. Did they indicate any identifiers of the car 13 other than the silver or gray Dodge Magnum with dark 1415 windows? 16 No. Α. Q. Did they indicate that the car was driving 17 18 at an erratic pace? 19 They said it left at a high rate of speed. Α. 20 Did they indicate other identifiers of that ο. 21 car? 22 No. Α. 23 And, so, the first silver or gray Dodge Q. 24 Magnum you came upon you followed? 25

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It was only one on Eastern at the time when Α. 1 1 was driving. 2 That would be first one? Q. 3 Yes. Α. 4 You followed that one? Q. 5 Correct. Α. 6 You were the lone occupant, the lone officer Q. 7 in your police car, correct? 8 Yes. Α. 9 Was there another officer in your car? Q. 1.0 Not at the time. Α. 11 Was there another person in your car? Q. 12 No. Α. 13 When you were following this car, did other Q. 14 officers respond to your location? 15 Yes. Α. 1.6 How many other officers backed you up? Ο. 17 I couldn't tell you the exact number. I Α. 18 would say at least 6 or 7 other officers. Q. When you say 6 or 7, would that indicate at 19 20 least 6 or 7 other cars? 21 Correct. Α. 22 Okay. Q. 23 And these 6 or 7 other officers, were they driving behind you, or were they attempting to go in 24 25

different directions to lock in the car that you 1 were following? 2 They were following behind me. Α. 3 All of these 6 or 7 were behind you? Q. 4 Correct. Α. 5 Was there anyone in front of you that the Q. 6 Magnum or the car that you were following was going 7 to end up coming in contact with? 8 As in police vehicles? Α. 9 Yes. Ο, 10 No. Α. 11 Okay. Q. 12 And when these other 6 or 7 cars came behind 13 you, is that when you turned on your overhead 14 lights? 15 Correct. Α. 16 And proceeded to stop the vehicle? Q. 17 Correct. А 18 And when you proceeded to stop the vehicle, Q., 19 there were several police cars kind of fanned out? 20 Yes. Α. 21 Q. And the officers got out of the vehicle? 22 Yes. Α. 23 Pointed their guns? Q. 24 Yes. Α. 25

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And ordered the occupant to roll down their ο. 1 windows? 2 Yes. Α. 3 Stick their hands out of the car? Q. 4 Yes. 5 Α. And wait for further commands? Q. 6 correct. Α. 7 You told the driver of the vehicle to throw Ο. 8 the keys outside of the car? 9 Correct. Α. 10 Onto the street? ο. 11 Correct. Α. 12 You then instructed the driver of the car to Q. 13 step out of the car slowly? 14 Right. Α. 15 With the hands up? Q. 16 Yes. Α. And walk backwards towards the sound of your 17 Q. 18 voice? 19 Yes. Α. 20 And Then ultimately lie on the ground? Q. 21 Yes. Α. 22 And then you had other officers go and Q • handcuff the driver of the car, is that correct? 23 24 Not until the other occupant came out. Α. 25

So the driver remained on the ground until Q. 1 you instructed the other occupant, who turned out to 2 be in the back passenger behind the driver's seat to 3 come out of the car? 4 He was in the back area. I can't see Α. 5 exactly where he was at. 6 Q. And did you see him stick his hands out of 7 the car? 8 Not initially. Α. 9 When you instructed them to roll down the Q. 10 windows and stick their hands out of the car, did 11 you see the driver's hand? 12 I saw the driver. Α. 13 Did you see the driver's hands? Q. 14 Yes. Α. 15 Did you see the other occupant's hands? Q. 16 No. Α 17 Did anyone else, any other officer see the 0 18 other occupant's hands? 19 I can't recollect that. No one said they Α 20 could see anybody else. 21 Q. When you are doing this felony stop with 22 several other officers, do you have radio 2.3 communication with those other officers at the 24 time? 25

Not during the stop. Α. 1 Not during the stop. Q. 2 It is not something where you have an ear 3 piece, and you can here each other talking to each 4 other? 5 You have ear pieces for radio, but at the Α. 6 time there is no need to tell a partner next to me 7 when he can hear me giving commands to him. 8 Q. So you order both occupants to stick their 9 hands out of the car, but you only see the driver's 10 hands. 11 The driver gets out of the car. You have the 12 driver on the ground, at which time you ordered the 13 other occupant to get out of the car? 14 A. Correct. 15 That occupant gets out of the back passenger Q. 16 seat behind the driver's side, correct? 17Α, Yes. 18 And that person gets out with their hands Q. 19 20 up? Yes. Α. 21 And walks backwards and lays on ground as Q. 22 you instruct them? 23 Yes. Α, 24 At that point you put both occupants into Q. 25

custody? 1 Yes. Α. 2 And you handcuff them? Q۰ 3 Yes. Α. 4 And you lead them to various patrol cars? Q. 5 Yes. Α. 6 And when this happens, you then sit and wait Q. 7 for homicide to come? 8 At that point we did not know if -- we Α. 9 waited. 10 When they got into custody, we brought them in front of each vehicle, patrol vehicle, separated 11 them, and at that point it was broadcasted through 12 the details of the call that one of the subjects was 13 14 a homicide. 15 So we just left the vehicle as is. Wе 16 didn't go inside it. 17 So you have them in front of the vehicle? Q. 18 Correct. А 19 And you search them? Q. 20 I patted them down, yes. Α. 21 Did you take anything out of their pockets? Q. 22 I did not. Α. 23 Who is one that searched the driver? Q. 24 I can't tell you. Α. 25

Who is the one that searched the other Q. 1 occupant? 2 I don't know. Α. 3 Did you do any of the searching? Q. 4 No. Α. 5 Okay. Q. 6 Who is the one that had the conversation 7 with the driver? 8 I did. Α. 9 So you did not search the driver, but you Ο. 10 did have a conversation with the driver? 11 Yes. Α. 12 And you don't know who searched the driver? Q. 1.3 I do not. Α. 14 How quickly after they had been removed from Q. 15 the car in handcuffs do you then -- does 16 Mr. Washington, the driver of the car, get searched? 17 I did not search him. Α. 18 I don't know. 19 How quickly after you move him out of the Q. 20 car do you question Mr. Washington? 21 I wasn't questioning him all. I asked if Α. 22 there was anything illegal in the vehicle. 23 That's not a question. Q. 24 That's standard procedure that we ask. Α. 25

Did you Mirandize Mr. Washington? Q. 1 No. Α. 2 Did you explain to him that he had a right Q. 3 to remain silent? 4 I did not Mirandize him. Α. 5 Before you spoke to him, you didn't let him Q. 6 know of his right to remain silent? 7 NO. Α. 8 And you then asked him if there was anything Q . 9 else in the vehicle, correct? 10 Correct. А 11 Did you ask him anything else? Q. 12 NO. Α. 13 That was the only question you posed to Q. 14 Mr. Washington? A. I asked if there was anything illegal in the 15 16 vehicle, and I believe that was it. 17 I believe I asked him where was he coming 18 from. 19 Okay. Q. 20 Just those 2 questions, where was he coming 21 from, and was there anything else illegal in the 22 vehicle? 23 Correct. Α. 24 So, was it at that time that you questioned Q. 25

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him about giving his consent to search the car? 1 He gave us consent to search the car, yes. Α. 2 Was it based on the question that you posed 0. 3 to him to; do we have consent to search the car? 4 I asked if there was anything else illegal Α. 5 in the vehicle, and he said no. He said you can 6 search the car. 7 He responded to your question no, and then Q . 8 offered, hey, you can search the car? 9 Yes. Α, 10 Did you get a written consent to search Q. 11 card? 12 No. Α 13 Did you tell any detective that you got a Q. 14 written consent to search card? 15 No. Α. 16 Did you ever explain to any other officer Q. that you have got a written consent to search card? 17 A. No, because there was no written consent to 18 19 search card. 20 Q. And it is also your testimony that the consent to search that was given was based on the 21 question that you gave; is there anything illegal in 22 24 the car, and then Mr. Washington said no, and then just offered; hey, you can search my car? 25

MS. PIEPER: Judge, I object to the 1 characterization. 2 I don't know that the witness characterized 3 that. I think counsel characterized it. 4 This witness is just answering Mr. Mann's 5 question. 6 THE COURT: I think we got that. 7 It is in the transcript. 8 The witness can answer, so overruled. 9 Go ahead, Mr. Mann. 10 So it was Mr. Washington that just Q. 11 volunteered that information when he was in 12 handcuffs, being removed from the car at gun point? 13 A. Yes. 14 Q. Okay. 15 And did Mr. Washington say anything else to 16 you or that it was? 17 A. Not that I can recollect, no. 18 Q. Okay. 19 So when he gave you what you believe to be 20 21 consent to search --MS. PIEPER: objection to that 22 characterization. 23 THE COURT: All right. 24 I will sustain that one. 25

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Go on. 1 Do you believe that Mr. Washington gave you Q, 2 consent to search? 3 Yes. Α. 4 Okay. Q. 5 So when you received what you believe to be 6 consent to search, you then searched the car? 7 I did not search the vehicle. Α. 8 Okay. Q. 9 Did you enter the vehicle? 10 No, Α. 11 Did you do anything with the vehicle? Q.. 12 I looked inside the vehicle from the doors Α. 13 being opened. 14 I never entered the vehicle. 15 Q. What about the keys on the ground, what did 16 you do with the keys? 17 I didn't touch the keys. Α. 18 Did you know of anyone that secured the Q. 19 keys? 20 I am sure they were secured. I don't know 21 Α. the officer who did it. 22 Q. Who was in charge of the scene? 23 Of the scene? Α. 24 Yes. Q. 25

1	A. Of the vehicle stop?
2	Q. Yes.
3	A. I would say the watch commander would be.
4	Q. Who is that?
5	A. The lieutenant that night.
6	Q. And who was that?
7	A. Lieutenant Beckler.
8	Q. Was he there at the time of the stop?
9	A I can't recollect if he was there or not.
10	Q. Do you remember seeing him after the stop?
11	ъ. Yes.
12	Q. How long after the stop do you remember
13	seeing him?
14	a t can't recall.
14	. When you saw what you described to be the
16	butt of a gun, was that on the front passenger seat?
10	A. On the seat, no.
	o Okav.
18	When it were you able to only see the butt
19	from the open door?
20	And you could see it from the back
21	index that was rolled down as well.
22	a se you also went through the back right
23	the butt of the gun?
2.4	T looked through the window that was rolled
25	5 A. I Looked Chrodyn en

down, yes. 1 And when you did that, did you indicate to Q, 2 anyone else that you had seen the gun? 3 Yes. Α, 4 Who did you indicate that to? Q ... 5 The supervisors. 6 Α. What supervisors? Q. 7 My supervisors at the time. Α. 8 Who was that? Q. 9 Sergeant Lynch. Α. 10 Was Sergeant Lynch in charge of the scene, Q. 11 or was that Lieutenant Beckler? 12 I would say it was a combination of people Α. 13 who supervised the scene. 14 And did you provide any information about Q. 15 where you found the gun to anyone else other than 16 Sergeant Lynch? 17 Yes. Α. 18 Who? Q. 19 Several officers that were there. Α. 20 Did you ever talk to any homicide Q. 21 detectives? 22 Α. Yes. 23 What homicide detectives did you talk with? Q. 24 I can't remember his name. 25 Α.

You don't remember who you spoke with? Q. 1 If I can refer to the notes. 2 Α. Do you have your notes? Q. 3 I do not. Α. 4 Did you create a report? Q. 5 I did not. Α. 6 Do you remember any of the names of the 7 Q. other officers that were with you? 8 Yes. Α. 9 Did any of those people create a report? Q. 10 Not that I know of. Α. 11 So you conduct this stop, this felony stop, Q. 12 and you didn't make any sort of report? 13 Myself personally, no, I did not make a Α. 14 report. 15 Did you sit down with a detective and go Q. 16 through the details of the stop? 17 Yes. Α. 18 What detective did you sit down with and go Q. 19 through the details with? 20 If I can reefer to my notes, I can't Α. 21 remember his name. 22 What notes; I don't know what you are Q. 23 talking about. 24 I believe Detective Rogers, homicide. Α. 25

You believe that Detective Rogers filled out Q., 1 a report? 2 MS. PIEPER: Objection, Your Honor, that's 3 not what the witness testified to. 4 The witness was asked did he sit down with a 5 police officer or a detective and discuss what 6 happened, and his answer was yes. 7 MR. MANN: Then I asked who was it, and he 8 said I don't remember, if I can refer to my notes. 9 MS. PIEPER: He said it was Bob Rogers. He 10 never said Bob Rogers filled out a police report. 11 THE COURT: Mr. Mann, ask him if he knows whether Detective Rogers filled out a police report. 12 Officer Parquette, you said if you can refer 13 Q. 14 to your notes, right? 15 Correct. Α. 16 What notes are those? 0. 17 The arrest report done. The arrest package Α. 18for this case. 19 Did you physically hand write any notes? Q. 20 I did not. А 21 Any notes that you have would be from Q. statements that you have made to other people that 22 23 have memorialized if in some manner or form? It would be from the arrest package for this 24 Α. 25
case, anything that was put together for it. 1 Would that be in the arrest report? Q.. 2 That would include it, yes. Α. 3 And is it your testimony that the Q. 4 description in the arrest report accurately reflects 5 what you indicate happened that night? · 6 I have not seen the arrest report. Α. 7 Yet you want to rely on the arrest report to Q. 8 indicate what happened that night, is that correct? 9 Correct. Α. 10 Okay. Ο. 11 Of who I spoke with to tell him about the 12 Α. vehicle stop, yes. 13 Did you only speak to one detective or more? Q. 1.4 one. Α. 15 And you don't remember which detective that Q. 16 was, but if it was in the arrest report, it would 17 indicate what detective you spoke to? 18 Detective Rogers. Α. 19 You did speak to Detective Rogers? Q . 20 Yes. Α. 21 It was in your conversation with Detective Q, 22 Rogers that you indicated that you had found the gun 23 in the car? 24 Yes. Α. 25

That was before the search, getting a search Q.] warrant, correct? 2 Correct. Α. 3 And when you found -- when you spoke to Ο. 4 Detective Rogers, did you tell him that the gun was 5 found on top of the passenger seat? 6 No. Α. 7 You told him that the gun was found where? Q. 8 Underneath the passenger seat. Α. 9 And was it found and secured? Q. 10 I did not secure it. When I saw it, I left Α. 11 it there. 12 Okay. Q. 13 Now, you indicated that you had stopped the 14silver Magnum as a felony stop, correct? 15 Yes. Α. 1.6 There were no traffic violations that caused Ο. 17 you to stop the vehicle, correct? 18 A. Correct. 19 It was only on the description that you Q. 20 received over the air that caused you to stop the 21 vehicle? 22 Correct. Α. 23 It was at that point that you drew weapons Q. 24 and removed the people from the vehicle? 25

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correct. Α. 1 MR. MANN: Court's indulgence. 2 When you looked in the back of the car, did Q. 3 you see only one item or multiple items? 4 I can't recollect what was exactly in back Α. 5 of the vehicle. 6 Do you remember multiple items or one? 7 Q. Multiple items. Α. 8 And was there only one item that gave you Q. 9 any sort of concern? 10 No. Α. 11 There were multiple items that gave you Q. 12 concern? 13 Yes. Α. 14 What were those multiple items that gave you Ο. 15 concern? 16 A latex glove next to the gun. Α. 17 Anything else? Q. 18 Not that I remember. Α. 1.9 That's what I saw. 20 MR. MANN: No further questions. 21 THE COURT: Ms. Pieper, any redirect? 22 MS. PIEPER: Just to clarify. 23 24 25

REDIRECT EXAMINATION 1 2 BY MS. PIEPER: 3 You did not search the vehicle prior to a Ο, 4 search warrant, correct? 5 Correct. Α. 6 Once the occupants were removed from the Q. 7 vehicle, you had to check to make sure there wasn't 8 a third person ready to blast your head off sitting 9 in the vehicle, correct? 10 MR. MANN: Objection, Your Honor. 11 It misstates what the original testimony 12 was, and if not then it is leading. 13 Q. Why did you look through the car with the 14 doors open after you had removed these 2 gentlemen 15 from the vehicle under a felony car stop? 16 A. To see if there were any other occupants in 17 the vehicle. 18 MS. PIEPER: Thank you. 19 Nothing further. 20 THE COURT: All right. 21 MR. OTTO: Could I ask a couple; I promise 22 not to take too long. 23 THE COURT: Sure. 24 25

RECROSS-EXAMINATION 1 2 BY MR. OTTO: 3 You asked Mr. Washington -- he is in custody Ο. 4 after -- he is not free to leave once you handcuff 5 him, correct? 6 Correct. Α. 7 You ask him if there is anything in the car Q. 8 without giving him his Miranda rights, is that 9 correct? 10 Correct. Α. 11 He answered your question no; is that Q . 12 correct? 13 Correct. Α. 14 Then you say as part of that answer no, he Q. 15 gives you consent to search the car, correct? 16 Correct. Α. 17 Why didn't you search the car? Q . 18 Because at the time we found evidentiary Α. 19 value in the vehicle, and we weren't going to search 20 it. 21 And who next arrived on scene other than the ο. 22 unformed officers who were there? 23 The detective that I spoke with. Α. 24 And who did you speak with on scene, do you Q. 25

remember? 1 Detective Rogers. Α. 2 Did you then leave the scene? Q. 3 No. Α, 4 How long did you stay? Q. 5 Until about 8:30 in the morning. Α. 6 Did you see CSI? 7 Q. Yes. Α. 8 Q. Did anyone -- did Detective Rogers search 9 the car? 10 Not while I was there. Α. 11 Q. Did anyone enter the car? 12 Nobody. Α. 13 MR. OTTO: I have nothing else. 14 MR. MANN: Your Honor --15 16 RECROSS-EXAMINATION 17 18 BY MR. MANN: 19 Q. Officer Parquette, you conducted the felony 20 stop, correct? 21 A. Correct. 22 Q. And you removed the occupants from the 23 vehicle? 24 A. Yes. 25

And then at that point you did a quick sweep Q., 1 of the vehicle to clear the vehicle, correct? 2 Correct. Ά. 3 It wasn't until after that you went and 0. 4 talked to Mr. Washington, who gave you consent to 5 search, that you then went in and looked and found 6 the butt of the gun? 7 A. I did not go into the vehicle or search the 8 vehicle. 9 Q. It wasn't until Mr. Washington gave you 10 consent to search that you then went back to the 11 vehicle, and looked inside the vehicle, and found 1.2 the butt of the gun, correct? 13 A. If he gave me consent or did not, the doors 14were open, and in plain view I could see what would 15 be in the vehicle. 16 Q. It wasn't until that he gave you consent 17 that you went back to the vehicle and looked inside 18 the vehicle, correct? 19 A. Correct. 20 Q. It wasn't during your clearing of the 21 vehicle that you looked inside the vehicle and found 22 the gun, correct? 23 A. Not at the time. I saw the gun. 24 The vehicle was already cleared, and that's Q. 25

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when you went back to look inside the vehicle? 1 Correct. Α. 2 So you were no longer concerned about Q. 3 someone blasting your head off when you were looking 4 inside the vehicle, correct? 5 Not any more. Α. 6 MR. MANN: No further questions. 7 THE COURT: All right. 8 Officer, thank you very much for your 9 patience and testimony. 10 I ask that you step down. 11 Please don't discuss your testimony with 12 anybody, aside from a representative from District 13 Attorneys office, Mr. Otto's or Mann's office. 14 They will identify themselves 15 appropriately. 16 Thank you for your time and patience. 17 THE WITNESS: Thank you. 18 THE COURT: State, call your next witness. 19 MS. PIEPER: Judge, what I am discussing 20 with defense counsel is whether I should call your next witness, since we probably are not going to get 21 22 through direct and all of cross. 23 He going to have to come back anyway. I have 24 to shut you down in 20. 25

Your call. 1 THE COURT: Then he stays under oath. 2 No one can talk to him. 3 MS. PIEPER: He will have to come back. 4 I can do something else, if the Court would 5 like. 6 What I can do, Judge, in regard to the 7 medical examiner, I have spoken to both counsel, and 8 they are going to stipulate that the cause of death 9 was gunshot wound. 10 The manner was homicide, and we stipulated 11 to -- I have here, which is marked as State's 12 Exhibit 1, the autopsy report, as well as the --13 MR. MANN: I didn't agree to the toxicology. 14 THE COURT: That issue has been alleviated 15 clearly. 16 MS. PIEPER: I have got to fix that. 17 THE COURT: I am sure we can fix that. 18 MS. PIEPER: I was going to attach the 19 result. I was giving him a copy just to be 20 complete. 21 MR. MANN: Your Honor, that's fine. Before 22 you remove that Danielle, I just want to put in that 23 when I agreed to the stipulation, that I had not 24 seen the toxicology report. 25

I didn't think it was part of the toxicology 1 report at the time. 2 THE COURT: Why don't you take a gander. 3 MR. MANN: I have. I do have questions, 4 but --5 THE COURT: So we are admitting the autopsy 6 report with or without the toxicology? 7 MS. PIEPER: I will take off the toxicology, 8 since Mr. Mann didn't agree to it. 9 MR. OTTO: We have stipulated but for the 10 limited purpose of this hearing, Your Honor. 11 MS. PIEPER: I apologize. 12 THE COURT: Any evidence that is admitted at 13 the preliminary hearing is deemed only for the 14 preliminary hearing. • 15 If this case gets up to District Court, the 16 state has to meet its burden to get any other 17 evidence admitted into the record. 18 MS. PIEPER: Judge, at this point, that is 19 marked as State's Exhibit Number 1. 20 I am taking the other half of the exhibit 21 with myself. 22 At the end of the preliminary hearing I was 23 going to do this, but I can do this now. 24 I have copies. I didn't want to admit 25

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originals at this point of both Defendants' 1 Judgements of Convictions. 2 THE COURT: Approach and look at it. 3 I have no objection to MR. MANN: 4 Mr. Moten's Judgement of Conviction filed April 5 10th, 2007 being admitted. 6 THE COURT: Number --7 MR. MANN: State's Exhibit 2. 8 THE COURT: 2 will be admitted. 9 Give that back to Shawna. 10 Still have 3, 4 and 5. 11 THE COURT: Okay. 12 So Mr. Mann did not object, so 2 is 13 admitted. 14 MR. OTTO: I have no objection to 3, 4 and 5 15 being admitted. 16 Essentially, Judge, those are MS. PIEPER: 17 the certified priors of both Defendants. THE COURT: 3, 4 and 5 are admitted also. 18 1.9° Okay. So I am thinking, unless there is anything else, I want to make sure everybody wants 20 to check anything that's been offered today that 21 everybody handled what has been offered today is 22 23 admitted for anything being talked about. MR. OTTO: there is nothing hanging out, I 24 25

don't think. 1 MS. PIEPER: I have some exhibits left for 2 other witnesses. 3 THE COURT: What happens is what has been 4 marked, and it still goes into a separate section. 5 You can't take that back. What is deemed 6 admitted will be separate, and they will go into my 7 evidence locker to come back with us. 8 Everybody check their tables that you don't 9 have any proposed or admitted. 10 All right. 11 We will pick back up Monday afternoon at 12 1:00 o'clock. 13 I think the State has 3 or 4 more 14 witnesses. 15 MS. PIEPER: They will all come Monday. 16 THE COURT: We have one long one? 17 MS. PIEPER: Yes. 18 THE COURT: We are in recess until Monday. 19 Gentleman, I see you back on Monday at 1:00 20 o'clock, and we will pickup with the remainder of 21 our witnesses. 22 All right. 23 24 (Hearing adjourned.) 25

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$1 \times (0, 16) \times (69, 23) \times (79; 21) \times (87; 21) \times (99; 227) \times (99; 21)$	description (64;11)(65:3)(91:5)(52:257
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	(10.4)
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r (45:19)	(97:5) (97:10) (97:14) (27:17)
rly (44:17)	general (44:25) (45:2)
ily (10:11)	gentleman (68:8) (102:20) gentleman (68:8) (102:15)
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Le (54:1) (54:3) (54:7)	getting (92:1) girlfriend (10:13)(10:14)
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nal (24:12) nd (30:24) (31:3) (56:4) (58:25)	given (84:22)
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(4:5)	glock (30:2) (30:4) (30:21) (30:22)
200 - 201 (35:11) (502 - 3)	1 = 1 or (59; 9) (93; 17)
rearm $(33:10)$ $(30:11)$ $(231:2)$ $(73:9)$ $(73:11)$ red $(3:25)$ $(4:3)$ $(30:25)$ $(31:2)$ $(73:9)$ $(73:11)$ $(54:10)$ $(62:17)$ $(75:24)$	$\sigma loves$ (41:17) (41:18) (41:22)
red $(3:25)(4:3)(30:25)(51:2)(1515)$	
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-51 d = 51 d =	1(98.22)(98:24)(99:9)(99:19)(100:24)
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(9:25)	(71;12) $(77;22)$ $(81:11)$ $(84:14)$ $(84:16)$ $(05,1)$ $(55,1)$
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ocused (43:16)	gravitated (5:13) (75:15) (75:24)
blowed $(32:15)(75:25)(76:5)$ (32:15)(75:25)(77:7)	$\begin{array}{c} gray & (65:4) & (74:25) & (75:15) & (75:24) \\ gray & (65:4) & (40:20) \\ \end{array}$
bllowing (76:14) (77:2) (77:3) (77:7)	grip (40:17) (40:20) ground (50:10) (76:21) (79:1) (80:13) (80:22) (86:16)
bllows (20:9)(62:20)	ground (50:10) (78:217(77:17(00:12))
bllow-up (19:9)(61:14)	group (42:18)
ootball (16:17) or (1:22) (3:21) (5:14) (5:15) (5:21) (6:11) (8:1) or (1:20) (1:22) (3:21) (5:14) (20:12) (23:23)	grow (7:14) grun (26:10) (26:16) (26:17) (26:18) (26:20) (28:8) (28:10) grun (26:10) (26:16) (46:16) (48:1) (48:7) (49:18)
or $(1;20)(1;22)(3;21)(5;14)(3;12)(20;12)(23;19)(23;23)$ 8;23)(9;6)(18;9)(18;18)(19;14)(20;12)(23;19)(23;23)	
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(102:2)	$\sum_{n=1}^{n} \sum_{j=1}^{n} (3 \cdot 25) (4 \cdot 6)$
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there $(3:20)(3:21)(4:23)(5:17)(6:3)(0.11)(11:11)(11:14)$ (8:10)(8:12)(10:1)(10:2)(10:10)(10:11)(11:11)(11:14) (8:10)(8:12)(10:11)(11:13)(14:15)(15:17)(15:21)(16:11)(14:15)(15:17)(15:21)(16:11)(14:15)(15:17)(15:21)(16:11)(16:	$t_{oxicology}$ (99:14) (99:25) (100:1) (100:1) (100:1)
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(18:19)(24:15)(20:10)(2000)(2000)(2000)(2000)(25:15)(35:25)	transcript (1:12) (85:8)
(33:11)(33:13)(33:14)(33:15)(34:25)(54:20)(54:2)(54:14)	transcript (1:12)(00.0)
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walk (39:17) (78:18)	
walked (69:21)	
walks (80:22)	(35:19) (35:23) (36:14) (38:3) (36:18) (34:20) (45:12) (45:21) (41:18) (42:1) (43:13) (44:2) (44:18) (44:20) (45:12) (45:21) (41:18) (42:1) (43:13) (44:2) (57:13) (57:3
<pre>wall (15:3) want (50:8) (68:25) (69:5) (91:8) (99:23) (100:25) (101:21 want (50:8) (68:25) (69:5)</pre>) $(41:18)(42:1)(43:13)(44:2)(54:16)(51:16)(57:1)(57:3)(47:24)(49:4)(49:25)(54:7)(55:5)(56:22)(57:1)(57:3)(47:24)(49:4)(49:25)(54:7)(55:5)(56:23)(55:11)(65:16)$
want (50:8)(68:25)(69:5)(91:8)(99:25)(100:121)	(47:24) (49:4) (49:25) (54:7) (54:8) (64:23) (65:11) (65:16)
wanted (11:2)(39:10)	(58;14) $(03,10)$ $(03,20)$ $(72,18)$ $(73,23)$ $(74;2)$ $(74;4)$
wants (101:21) wants (101:21)	(58:14) $(63:16)$ $(63:24)$ $(64:1)$ $(64:7)$ $(67:23)$ $(74:2)$ $(74:4)$ $(66:12)$ $(68:15)$ $(69:15)$ $(72:18)$ $(73:18)$ $(73:23)$ $(74:2)$ $(74:4)$ $(66:12)$ $(68:15)$ $(69:15)$ $(72:16)$ $(73:16)$
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(60;17)(92;2)(94;5) = $(7,11)(7,19)(8;4)(8;9)$	
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Which $(29:16)(34:14)(36:10)(42.22)(43:0)(35:26)(69:20)$	(78:22) (79:15) (80:18) (80:21) (80:24) (81:2) (81:4) (81:6)
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$(a_1, a_2, (a_1, a_1), (a_1, a_1), (a_1, a_1), (a_1, a_2), (a_1,$	
(95, 17) (95, 20) (86, 2) (86, 6) (86, 7) (86, 10) (85, 14) (85, 17)	
(85:17) (85:20) (87:12) (87:15) (87:19) (87:21) (87:23) (86:19) (87:10) (87:12) (87:15) (87:19) (87:21) (87:23) (88:2) (88:3) (88:5) (88:15) (88:16) (88:21) (88:24) (89:1)	
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(96:5) (96:7) (95:20) (00:22) (97:22) (98:1) (98:3) (98:4) (97:10) (97:11) (97:17) (97:18) (97:22) (98:1) (98:3) (98:4) (98:9) (98:11) (98:17) (98:18) (98:25) (99:23) (100:3)	
 $\begin{array}{c} (102:6) (102:9) (102:23) \\ \textbf{your} (19:10) (19:12) (19:14) (19:16) (20:12) (27:13) \\ (29:23) (31:17) (35:1) (35:7) (35:16) (35:17) (37:2) (37:20) \\ (29:23) (31:17) (35:1) (35:7) (35:16) (35:17) (47:24) \end{array}$	
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(42:25) (43:23) (43:11) (50:22) (51:14) (54:21) (57:15) (49:15) (49:23) (50:20) (50:22) (51:14) (54:21) (57:15) (58:11) (59:16) (61:17) (61:18) (61:20) (61:24) (62:7)	
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(74:15)(76:8)(76:10)(76:12)(91:2)(91:22)(94:9)(94:11) (84:21)(89:3)(90:3)(90:15)(91:4)(91:22)(94:9)(94:11) (95:12)(96:15)(97:21)(98:4)(98:9)(98:12)(98:17)(98:19)	
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zooming (41:7)(49:18)	

1	IN THE SUPREME COURT OF THE STATE OF NEVADA
2 3 4 5	MATTHEW WASHINGTON, Appellant, vi.
6 7	THE STATE OF NEVADA, Respondent.
8	APPELLANT'S APPENDIX VOLUME I PAGES 001-241
9 10 11	PHILIP J. KOHN Clark County Public Defender 309 South Third Street L as Vegas Nevada 89155-2610STEVE WOLFSON Clark County District Attorney 200 Lewis Avenue, 3rd Floor Las Vegas, Nevada 89155
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16	<u>CERTIFICATE OF SERVICE</u> I hereby certify that this document was filed electronically with the Nevada
17 18	I hereby certify that this document was med electronic Service of the Supreme Court on the day of <u>JUML</u> , 2015. Electronic Service of the
19	Supreme Court on the <u>1</u> day of <u>poorec</u> be foregoing document shall be made in accordance with the Master Service List as follows:
20	CATHERINE CORTEZ MASTO HOWARD S. BROOKS SHARON DICKINSON
21	STEVEN S. OWENS I further certify that I served a copy of this document by mailing a true and
22	
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26	PO Box 650 Indian Springs NV 89070
27	BYEmployee, Clark County Public Defender's Office
28	3
